



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: 003

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D. M. Gray

6 May 2026

The Secretary
Standing Committee on Environment and Planning
Legislative Assembly
ACT Legislative Assembly
P.O. Box 1020, Canberra ACT 2601

By email

Dear Sir/Madam,

**RE: Draft Major Plan Amendment to the Territory Plan 2023
Block 16 Section 25 Farrer Street, Braddon
and
Development Application 202443065
Block 16 Section 25. 21 Elder Street, Braddon

Former BRADDON BOWLING CLUB**

Please accept this submission to the Legislative Assembly's Standing Committee on Environment and Planning.

We oppose the application to rezone the Farrer Street side of Block 16, Section 25 as RZ4.

We object to the development proposal and lease variation for the Elder Street side of Block 16, Section 25.

The integrity of the zoning system will be compromised if "one-off" individual rezoning applications succeed or if developments that are substantially at variance with the rules for

the zone are permitted. There can be no public confidence in zoning that can be changed *ad hoc* to cater for individual aspiration or profit.

We own a unit in Farrer Street, Braddon, near Block 16, Section 25 – the former Braddon Bowls Club. It is occupied and used regularly by ourselves and our extended family. We therefore have a keen interest in both the rezoning application for the Farrer Street side and the development application for the Elder Street side of Block 16.

Block 16 is in that part of Braddon that is a low density residential area of 1 and 2 storey dwellings with a child care centre, tennis club and primary school serving the local community.¹ Farrer Street, in particular, is quiet with a peaceful ambience and character and little traffic. In our opinion the street scape is very attractive with its trees, residential gardens and consistency of building heights. We and many other residents wish to maintain these characteristics.

We submit that the former Braddon Bowls Club site should be preserved for community use. We would like to see it become a dedicated park with a playground with some sun and rain shelter and picnic facilities. A public park would enhance the amenity of the surrounding area, including for the adjacent primary school, child care centre and tennis club.²

However, if the site is not preserved for community use, then we submit that it should be zoned RZ2, which allows single and two storey dwellings, including attached dwellings, with no more than 45% site coverage. Residential buildings of this type would be consistent with the streetscape, amenity and heritage of Farrer and Elder Streets Street while providing a additional housing that is close to the City Centre, transport and other amenities.

¹ The current zoning is CZ6 for buildings up to 2 storeys in height. The adjacent and nearby land is zoned RZ1 – single dwellings, and RZ2 – Suburban Core Zone – single dwellings and small-scale medium density housing.

² As there is an adjacent child care centre, a park is likely to be well used. Other parks and playgrounds are further away. Walking to Corroboree Park from the child care centre from Farrer Street requires crossing the very busy Limestone Avenue where there are no pedestrian crossing lights and walking a distance that would be too far for very young children. (We do not have a family or commercial interest in the child care centre.) A park is likely to be used also by primary school families, tennis club members and local residents.

We oppose any amendment to the Territory Plan that would permit residential buildings that are higher than 2 storeys in RZ2 zones. (We have been informed that it is proposed to amend the Plan to allow buildings of 3 storeys or a height of 10.5 metres in RZ2 zones.)

Farrer Street

See above and further comments below.

Block 16, Section 25 is zoned CZ6 for buildings of **up to 2 storeys** in height. It is adjacent to land zoned RZ1 – single dwellings, and near RZ2 zoned blocks – Suburban Core Zone – single dwelling and small-scale medium density housing.

The indicative proposal for development of the Farrer Street half of the site outlined in the Purdon Report (page 23) submitted with Syzygy's rezoning application is for buildings that would be 4 storeys and 12.5 metres high, including a long 4 storey building against the eastern boundary. We submit that this proposal is inconsistent with the character, amenity and heritage of Farrer Street and Elder Street.

Buildings that are 12.5 metres high would stand above the other dwellings in Farrer and Elder Streets and would dominate the area.

Further, a 4 storey building along the eastern boundary as described in the Purdon Report would carry a high risk of overshadowing and overlooking the adjacent child care centre and neighbouring homes with a reduction in sunlight and loss of privacy.

The number of dwellings likely to be contained in 3 and 4 storey buildings would increase the number of motor vehicle movements and parked cars with adverse consequences for safety and convenience of residents, their visitors and users of the child care centre and primary school.

In our opinion it would be preferable to have future medium, and perhaps higher, apartment buildings in Mort and Lonsdale Streets where they would be consistent with the existing character, amenity and streetscape of that locality.

Elder Street

See pages 1 and 2 above and below.

Syzygy'a (Bulum Group), development application for a large multi-storey hotel and other commercial uses should not be permitted in this predominantly residential part of Braddon on land currently zoned CZ6 for buildings up to 2 storeys in height and adjacent to homes in RZ1 and RZ2 zones.

The developer has not provided any justification for a hotel development on the subject site. It would be entirely unnecessary and out of character with the eastern part of Braddon. In our opinion, a hotel and bars is an inappropriate use of land adjacent to a child care centre and a primary school. Northbourne Avenue, Mort Street and Lonsdale Street are the appropriate areas for large developments and hotel, bar, café and restaurant uses in Braddon.

If the development is approved, an area of land that was set aside for community use would be lost forever. If it is not to be retained for community use, it should be rezoned RZ1 or RZ2 and the lease varied to allow it to be used for 1 and 2 storey homes.

Both the physical form and the proposed uses of the site as a hotel with 104 rooms/serviced apartments, bars, cafes/restaurant, shops, function/performance areas and a roof top bar, kitchen and function area would be fundamentally inconsistent with and severely detrimental to the nature, character, amenity and ambiance of this eastern part of Braddon.

Despite the objections to the height and scale of the proposed development when the first iteration of the application was available for public consultation, the amendments to the application make no change to the height of the 2 largest buildings. They would be 6 and 4 storeys above ground level respectively.

These buildings would stand substantially above and intrude unacceptably into the skyline of the eastern part of Braddon that consists of 1 and 2 storey structures.

In addition, the proposed mass of the development is inappropriate for this part of Braddon.

The proposed height and proximity to site boundaries is bound to result in overshadowing of nearby homes, school play ground and tennis courts.

It would result in overlooking of nearby homes, the child care centre and Ainslie Primary School with loss of privacy.

The proposed development would result in a substantial increase in large, noisy vehicles in Farrer Street, because it is proposed that waste collection vehicles (and there would be a lot of waste), delivery and trade vehicles would travel along a new laneway on the eastern boundary and exit into Farrer Street. This would be detrimental to the amenity of Farrer Street. Also, it would cause disruptive noise to the adjacent child care centre.

As the Purdon report for the Elder Street hotel etc application says, the development generates a requirement for **169** on-site car parking spaces. The proposal provides for only **131** on-site parking spaces, i.e. a shortfall of **38** spaces. Also, there appears to be inadequate on-site parking space for service and delivery vehicles. Therefore, there will be an increase in the number of vehicles parked in Elder Street, probably in Farrer Street, and in other nearby streets.

This, together with the increase in traffic generated by hotel guests, users of the other commercial premises on the block, staff and contractors, will result in greater traffic congestion particularly at school and child care drop off and pick up times. The carriageway of Elder Street is relatively narrow for vehicles travelling in opposing directions past parked and temporarily stopped vehicles. It is also likely to negatively affect the availability of convenient parking spaces for people visiting, and trades people working on, residences in the vicinity.

An increase in traffic and parked vehicles is likely to increase safety risks for primary school children when crossing Elder Street.

The landscaping and vegetation proposal is unrealistic. The underground car park would occupy most of the site below ground, which would make it impossible to grow trees and large shrubs in the ground above. The area of open space that would not be covered by buildings or paving would leave little space for trees and large shrubs. The diagrams on sheets 801 and 831 of the landscape plans in the Purdon Report show (using the scales on the diagrams) that it is proposed to plant trees in 60 centimetre diameter or smaller pots of

similar depth with root barriers. It is unrealistic to think that a pot of this size would support a large tree – or even a medium sized tree – that would provide shade and wild life habitat.

If approved, the overbearing size and uses proposed by the development application are likely to reduce the value of nearby homes. Who would want to live in a house near a 104 room hotel, cafes/restaurant including outdoor seating, shops, performance/ conference centre, swimming and immersion pools and other commercial facilities and a roof top area with bar and kitchen producing noise and traffic at all times of the day and night, overlooking, overshadowing, and light spill?

If the former Braddon Bowling Club site is not retained for community use, then decisions about development of the site for other purposes should be considered as a whole, rather than as two discrete proposals – one for the Elder Street half and one for the Farrer Street half. Whatever is permitted on the Elder Street side will affect the Farrer Street side. The need for this is demonstrated by the inconsistency between the current iteration of the development application for the Elder Street half and the rezoning application for the Farrer Street half.³

In summary:

- We object to the development application for a hotel and other structures and purposes on the **Elder Street** side of Block 16, Section 25, Braddon as being entirely inappropriate and fundamentally inconsistent and detrimental to the locality, its residents, Ainslie Primary School, the child care centre and users of the nearby churches and tennis club for the many reasons given above;
- We oppose the Bulum Group's (Syzyrgy) application to rezone the **Farrer Street** side of this land to Residential **RZ4** as being inappropriate for the reasons given above;
- In our opinion the whole of the former Braddon Bowling Club land should be retained for community use;
- If the land is not retained for community use, it should be zoned for 1 and 2 story residential use;

³ The development application for 21 Elder Street includes a laneway along the eastern boundary of the entire block 16, including the Farrer Street half. The indicative plans submitted in support of the rezoning application for the Farrer Street half shows 4 storey town houses along the eastern boundary of the Farrer Street half.

- *Ad hoc* changes in zoning individual blocks, and developments that are at significant variance to the rules applicable to the zone, to cater for individual aspirations or profit undermine the integrity of the Territory's planning system and destroy public confidence.

We would appreciate receiving the Committee's report, or a link to it, in due course. My email address is [REDACTED]

Yours faithfully

D. M. Gray