



ACT
Government

**Territory
Planning**
Authority

CONSULTATION REPORT

**Draft Plan Amendment to the Territory
Plan 07**

**Former Braddon Bowls Club
Part Block 16 Section 25 Braddon**

February 2026

This consultation report was prepared
under division 5.2.5 of the *Planning Act 2023*

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1.0 INTRODUCTION

1.1 Purpose

This document, prepared under section 67 (3) of the *Planning Act 2023* (the Act), details the outcomes of entity and public consultation the Territory Planning Authority (the Authority) has undertaken for Draft Plan Amendment 06 (DPA-07).

This document should be read in conjunction with the DPA-07 document that has been given to the Minister which is available on the [Planning website](#).

Key parts of this document are:

- section 2 – outlines comments received from government entities
- section 3 – outlines comments received from the public

1.2 Outline of process

DPA-07 has been given to the Minister for consideration and referral to the relevant Legislative Assembly Standing Committee. More information about the next steps for this DPA are provided in the DPA document that is available on the [Planning website](#). General information about the major plan amendment process is also available on the Planning website [here](#).

2.0 CONSULTATION WITH GOVERNMENT ENTITIES

In accordance with section 62 of the Planning Act the Authority has consulted with each of the following entities in relation to this DPA:

- the National Capital Authority
- the Conservator of Flora and Fauna
- the Environment Protection Authority
- the Heritage Council
- each referral entity
- if unleased or leased public land, each custodian of the land likely to be affected.

A copy of the comments received from the abovementioned entities are provided in Appendix 2 of this document.

Below is a summary of each of the entity's comments.

Entity	Entity comments	Authority's response
National Capital Authority	The proposed land use amendment is not inconsistent with the Plan and the NCA has no concerns.	Noted.
ACT Heritage Council	1. The Major Planning Amendment is unlikely to diminish the heritage significance of Ainslie Primary and Public Schools or Haig Park, as it	Noted.

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Entity	Entity comments	Authority's response
	<p>proposes no change to either registered heritage place.</p> <p>2. Any future development application for the site should describe how the proposed outcomes respect the local heritage character and context, in accordance with the principles of good planning set out in the <i>Planning Act 2023</i>.</p> <p>In relation to local character and context, the DPA-07 would result in development outcomes of appropriate bulk and scale, however, the following design considerations are also identified to ensure there are no unintended development consequences of the rezoning:</p> <p>1. Any future development should provide a sympathetic design response to the local character with regard to bulk, height, scale, setting, and materiality.</p> <p>2. The concept of 'Village Green' is supported, with the potential to enable deep root and mature landscape elements, as part of any future development.</p> <p>3. Future development should consider diversity in the built typology that takes cues from the existing pattern of the development with regard to existing through site connections and linking patterns, as well as the existing landscape character. Generous setbacks from the front boundary, low-scale elements forward of the building line, and mature landscape elements are encouraged.</p> <p>4. Any future development over two storeys, should explore ways to enhance the architectural expression of the new buildings through the use of a podium wall and setback at height to reduce the visual prominence of medium rise buildings in low scale residential areas. Podium walls paired with setbacks at height would allow for greater façade articulation and architectural expression that provide a sympathetic response to the local character.</p>	

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Entity	Entity comments	Authority's response
	<p>5. The Council encourages to the use of landscape elements, such as hedges, tree planting and gardens as an appropriate boundary treatment in response to the broader landscape character of the local area which is emblematic of the Garden City.</p>	
<p>Environment Protection Authority (EPA)</p>	<p><u>Contamination</u></p> <ul style="list-style-type: none"> • Prior to rezoning, an environmental assessment, in accordance with EPA endorsed guidelines, must be undertaken by a suitably qualified environmental consultant to determine whether past activities have impacted the site from a contamination perspective and to determine whether the site is suitable for the proposed commercial/residential uses. • The consultant's assessment report into the site's suitability for the proposed and permitted uses from a contamination perspective and a letter of introduction from the land custodian and/or person/company responsible for commissioning the report detailing the purpose of the report and the action being requested, in accordance with Contaminated Sites Information Sheet 11 – EPA Report Submission Requirements, must be submitted for review and endorsement prior to the site being used for other purposes. <ul style="list-style-type: none"> – Reports and documents relating to contamination must be submitted to EPA via contaminatedsites@act.gov.au. – The standard response time for reviewing documents is 15 working days from date of receipt; however, EPA endeavours to provide responses as soon as possible. • All spoil identified at the site must be managed in accordance with EPA Guidelines for Spoil Management in the ACT available at Environment Protection Policies & Guidelines. • All soil subject to disposal from the site must be assessed in accordance with EPA Information Sheet 4 - Requirements for the reuse and 	<p>Noted.</p>

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Entity	Entity comments	Authority's response
	<p>disposal of contaminated soil in the ACT available at Contaminated Sites.</p> <ul style="list-style-type: none"> No soil is to be disposed from the site without EPA approval. <p><u>Noise</u></p> <ul style="list-style-type: none"> A noise assessment detailing possible noise impact from the adjoining recreational facilities (tennis, proposed development of outdoor recreation facility) onto the residential dwellings will be required at the DA level for the buildings. The assessment must incorporate required noise mitigation measures through the design and/or siting of the residences. The noise assessment must be submitted for review and endorsement by EPA. 	
<p>Conservator of Flora and Fauna</p>	<ul style="list-style-type: none"> Indicative concept shows proposed tree canopy cover is only at 25%. We recommend increasing to 30% in line with the Urban Forest Strategy. Future DAs will require a detailed Tree Management Plan to account for the registered tree (<i>Quercus robur</i>) to the east of the block with the canopy overhanging the site. Habitat plantings for small woodland birds are recommended as part of landscaping. Future DAs will require species schedules for review. 	<p>Noted.</p>
<p>TCCS (land custodian)</p>	<p>The proponent is required to initiate pre-Development Application (pre-DA) meetings to facilitate consultation and discussion on key aspects of the proposal, such as traffic, tree, waste management, stormwater, active travel infrastructure, and any potential impacts on public assets to ensure that relevant issues are identified and appropriately considered early in the planning process.</p> <p>TRAFFIC Development Coordination Branch (DCB) understand that there have been changes proposed in the most recent submission.</p>	<p><i>Traffic</i></p> <p>Noted.</p> <p><i>Parking</i></p> <p>Parking will be assessed against the relevant Assessment Outcome of the Residential Zones Policy and with consideration to the Residential</p>

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Entity	Entity comments	Authority's response
	<ul style="list-style-type: none"> - The Transport Impact Assessment Report submitted with the MPA prepared by SALT3 dated 28/08/24 is based on a previous proposal for the site. It is understood that the latest proposal shows an increase in the number of dwellings to 38 townhouses. - It is also understood the proposal requires 63 car parking spaces, whereas 52 spaces are proposed on-site. At the DA stage, any reduction in parking requirements must be supported by typical weekday and weekend parking surveys and a safety assessment to understand if overspill parking can be safely accommodated. - In addition, an updated Transport Impact Assessment Report is required at the DA stage to reflect the latest proposal as per the requirements in the ACT Transport Impact Assessment Guidelines 2025 - https://www.cityservices.act.gov.au/plan-and-build/standards-codes-and-guidelines. <p>TREES Urban Treescapes (UTS) main concerns are the potential impacts on the street trees; For example, but not limited to:-</p> <ul style="list-style-type: none"> • Services installations/ abandonments/ exhuming/ tie-ins or realignments within the Tree Protection Zone (TPZ) of the street trees • Widening of existing driveways Tree Protection Zone (TPZ) or new driveway locations within the TPZ of a street tree. • Basements along the boundary that may sever street tree roots – Its preferred the basement is set back to accommodate the tree protection zone (TPZ) of the trees with the possibility of minor encroachments (TPZ as designated by the <i>Urban Forest Act 2023</i> which is canopy +2m) • Canopy protection during construction where the vehicles enter the site. 	<p>Zones Technical Specification.</p> <p><i>Trees</i></p> <p>Noted.</p> <p><i>Waste</i></p> <p>Noted.</p>

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Entity	Entity comments	Authority's response
	<ul style="list-style-type: none"> Pruning may be required also to deal with any low-hanging branches at the access point. A pruning plan can be submitted with the Tree Management Plan for approval by UTS. <p><u>Tree Management Plan (TMP)</u> The proponent will be required to submit a Tree Management Plan (TMP) as requirement under the <i>Urban Forest Act 2023</i>, for any trees that will be impacted by the development. The TMP is for the protection of the public trees along Farrer Street and if the site access is via Elder Street, then those trees will also need to be considered. The <i>Tree Management Plan (TMP) - Public tree protection requirements and Urban Forest (Tree Management Plans) Guidelines 2023</i> will help guide the proponent in developing a TMP to meet TCCS requirements.</p> <p>WASTE</p> <ul style="list-style-type: none"> Any development proposal will need to be in accordance with the Development Control Code for Best Practice Waste Management in the ACT 2019 (DCC), EAN24, the organic green bin policy and other relevant materials. 	

3.0 CONSULTATION WITH THE PUBLIC

3.1 Consultation

In accordance with 63 of the Act, draft major plan amendments are required to be made available on the [ACT planning website](#) for public comment for a minimum period of 30 working days.

The public consultation period for DPA-07 commenced on 21 November 2025 and closed on 23 January 2026 (for a total period of 43 working days).

In addition to publishing the material on the ACT planning website, the following were also completed to inform the public about consultation on DPA-07:

- mailed letters to surrounding lessees
- sent emails to subscribed stakeholders, which includes local community groups and associations.

3.2 Comments

A total of 22 written comments were received during the consultation period, including 2 late submissions. One submission was provided by community group, one submission was a joint local resident submission, and 20 were individual comments.

Copies of public comments were made available on the [Planning website](#) after the completion of public consultation and have been provided at Appendix 3 of this document.

3.3 Summary of comments

Below is a summary of the issues raised in written comments during public consultation that are relevant to the planning system.

3.3.1 Anticipated Development and Streetscape Impacts

Submitters expressed concern that rezoning to RZ4 would facilitate building heights and densities that are inconsistent with the existing low-rise residential context. The expected increase in scale is perceived to significantly alter the established character and amenity of the area.

Some respondents noted concerns regarding potential impacts on privacy, winter sunlight access and overall residential amenity. Increased building bulk was noted as contributing to overlooking and overshadowing of surrounding dwellings, community facilities and recreational spaces.

Submissions also raised concerns about clarity of controls relating to building setbacks, site coverage, landscaping and tree-canopy protection. Concerns were raised that reduced planting areas and hard-surface expansion could negatively affect the local environment and streetscape character.

Response

The proposed RZ4 zoning is consistent with the ACT Government's policy directions relating to urban consolidation and the supply of additional housing in well located areas. Given the subject site's proximity to both the City Centre and the Braddon mixed use precinct that both offer a wide range of goods, services and amenities, and convenient access to public and active travel infrastructure, the location is well suited for additional housing.

Design, amenity and character considerations will be addressed through the DA process once a development proposal has been lodged for assessment. Development proposals in residential zones must demonstrate that they are consistent with the assessment outcomes, which include considerations of appropriate scale, minimising adverse impacts of development on surrounding uses, protection of residential amenity, and landscape design among others. In demonstrating compliance with the assessment outcomes, consideration is to be given to the relevant design guides and may be given to planning technical specifications which serve as a benchmark.

It is noted that RZ4 currently permits a maximum height provision (Assessment Requirements) of 12.5m, equating in practice to an effective achievable maximum of 4 storeys. Notably, if commenced as currently proposed, the Missing Middle Housing Reforms (i.e. Draft Major Plan Amendment 04), the RZ4 zone will permit up to a maximum of 6 storeys for a multi-unit housing development.

In addition to the provisions of the Territory Plan, any proposal of 5 storeys or more is required to consult with the National Capital Design Review Panel (NCDRP) prior to lodgement of a Development Application, providing additional support to ensure the development proposal is of high quality and is sensitively integrated with the surrounding streetscape.

3.3.2 Traffic, Congestion and Parking Pressures

A recurring theme across submissions was the expectation that the proposal would exacerbate existing traffic and parking constraints. Residents noted that current pressures during childcare and school peak periods are already significant, and that higher-density development is likely to intensify congestion without appropriate assessment at the rezoning stage.

The proximity of the proposal to a childcare centre, primary school, aged-care facility, local church and pedestrian connections was also highlighted. Submitters considered that increased traffic and reduced parking availability pose risks to children, elderly residents and other vulnerable users.

Response

This DPA proposes zoning changes only. While indicative plans were provided with the DPA, the proposal is not assessed at this time. Rather, this will occur at the DA stage. Parking, traffic, and associated safety matters are able to be more comprehensively resolved at DA stage, as the detailed design will be finalised. An

up-to-date and accurate traffic report would need to be provided with the DA reflecting the parking and traffic considerations of the final detailed design of the development. Further traffic and parking advice will be provided at the DA stage. The DA will also be publicly notified, providing the community with further opportunity to comment on the development proposal.

3.3.3 Noise, Activity and Operational Impacts

Concerns were raised that increased vehicle movements and potential commercial-style activity could result in ongoing noise impacts, including early-morning and late-evening disturbances. Submitters highlighted the potential for extended operational hours if future development includes mixed-use or hotel-type uses.

Response

The proposed RZ4 zoning does not permit commercial uses, with the exception of 'home businesses' that are subject to a variety of limitations on scale and intensity to ensure they do not pose a nuisance to neighbours. As such, activity is anticipated to be limited to vehicle and pedestrian movements directly associated with a future residential development on the site.

The ACT Government manages potential amenity impacts from construction through a structured framework of legislation, policy, and enforceable approval conditions. Key laws include the *Planning Act 2023*, which establishes the development assessment system and enables conditions to control noise, dust, traffic, and hours of work, and the *Environment Protection Act 1997*, which regulates environmental nuisances such as noise, air pollution, and vibration through enforceable Environment Protection Policies and licensing requirements. Construction sites are often required to prepare specific management plans consistent with the *ACT Environment Protection Regulation* and relevant guidelines, outlining how impacts on nearby residents and businesses will be minimised. Government inspectors also monitor compliance and can issue directions or penalties where obligations are not met, ensuring construction proceeds in a way that protects local amenity from unreasonable impacts.

3.3.4 Loss of Commercial-Zoned Land (CZ6)

Residents expressed concern regarding the loss of a potential community/leisure site if CZ6 zoning is removed. Submissions emphasised the long-term importance of retaining community facilities in Braddon as the surrounding suburbs continue to intensify.

Response

The Authority notes that commercial zones, including the current CZ6 zone, are primarily for commercial developments rather than community facilities. Commercial zones aim to provide a strong economic focus and land for the supply of commercial services. In many cases, complementary uses are also permitted in commercial zones, however, these should not detract from the primary commercial nature of the zone.

While the proposal includes rezoning from a commercial zone to residential, this will largely limit commercial uses. It is also noted that CZ6 is proposed to be retained on the southern portion of Block 16 Section 25 Braddon where these uses will continue to be permitted (i.e. commercial accommodation, shop, indoor recreation and outdoor recreation facilities).

3.3.5 Planning Process, Precedent and Strategic Context

Multiple submissions raised broader concerns regarding planning-system consistency and precedent. Issues cited include the absence of a coordinated precinct plan and insufficient consideration of cumulative impacts from existing and proposed developments in the area.

Response

The ACT Planning Strategy 2018 and the Inner North and City District Strategy have been considered by the Authority during the amendment process, as well as the Minister’s Statement of Planning Priorities 2025-2028. The proposed amendment is considered to be appropriately aligned with the objectives of these strategies, through the facilitation of additional well-located housing.

Under the *Planning Act 2023*, through the DA process decision makers are required to consider a range of items that include relationships between, and any implications for, proposed and existing development. These include:

- the suitability of the proposed development in the context of the site and the site surrounds
- the probable impact of the proposed development, including environmental impacts.
- whether it achieves an appropriate transition between the zones (if the site of the proposed development adjoins another zone)
- the interaction of the proposed development with any other adjoining or adjacent development proposals.

4.0 CHANGES MADE TO DPA-07 FOLLOWING CONSULTATION

The DPA-07 document, available on the Planning [website](#), contains all changes to the Territory Plan proposed by DPA-07.

No revisions are proposed for DPA-07 following consultation.

INTERPRETATION SERVICE

To speak to someone in a language other than English please telephone the Telephone Interpreter Service (TIS) 13 14 50

LANGUAGE	DETAILS
English	If you need an interpreter please call: 13 14 50
Mandarin (Simplified Chinese) / 简体中文	如果您需要翻译，请致电：13 14 50
Arabic / العربية	إذا كنت بحاجة إلى مترجم شفهي اتصل بالرقم: 13 14 50
Cantonese (Traditional Chinese) / 繁體中文	如果你需要傳譯員，請致電：13 14 50
Vietnamese / Tiếng Việt	Nếu bạn cần thông dịch viên, xin gọi: 13 14 50
Korean / 한국어	통역사가 필요할 경우 다음 번호로 전화하시기 바랍니다: 13 14 50
Spanish / Español	Si necesita un intérprete, llame al 13 14 50
Persian (Farsi) / فارسی	اگر به مترجم نیاز دارید، لطفاً به این شماره تلفن کنید: 13 14 50
Dari / دری	اگر به یک ترجمان شفاهی نیاز دارید لطفاً به شماره 131450 زنگ بزنید.
Punjabi / ਪੰਜਾਬੀ	ਜੇਕਰ ਤੁਹਾਨੂੰ ਵਿਸ਼ੇ ਦੁਆਰਾ ਸੇਵਾ ਦੀ ਲੋੜ ਹੈ ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਫੋਨ ਕਰੋ: 13 14 50
Tamil / தமிழ்	உங்களுக்கு மொழிபெயர்த்துரைப்பாளர் ஒருவர் தேவைப்பட்டால் 13 14 50 என்ற எண்ணை அழைக்கவும்
Greek / Ελληνικά	Αν χρειάζεστε διερμηνέα, τηλεφωνήστε: 13 14 50
Italian / Italiano	Se hai bisogno di un interprete, chiama: 13 14 50
Hazaragi / هزاره گی	اگه ده ترجمان ضرورت ده رید، لطفاً ده شماره 13 14 50 تماس بگیریډ
Thai / ภาษาไทย	หากคุณต้องการล่าม กรุณาโทรไปที่ 13 14 50
Karen / ကညီကျိင်	ဖဲန့မ့ါလိာ်ဘာ်ပုၤကတိၤကျိးထံတၢ်တဂၤအခါဝံသးစူၤကိးဘာ်-၁၃၁ ၄၅၀ တက့ၢ်.

Telephone and Interpreter Service 13 14 50 - Canberra and District - 24 hours a day, seven days a week

APPENDIX 1 Comments from Government entities

From: [Pagadala, Tanmayi](#)
To: [Terrplan](#)
Subject: FW: REQUEST FOR COMMENTS BY 29 JANUARY 2026 - Mandatory Entity Consultation - Draft Major Plan Amendment 07 Former Braddon Bowls Club (DPA-07)
Date: Monday, 19 January 2026 2:32:16 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)

OFFICIAL

From: ConservatorFloraFauna
Sent: Monday, 19 January 2026 2:31 PM
To: Pagadala, Tanmayi
Subject: RE: REQUEST FOR COMMENTS BY 29 JANUARY 2026 - Mandatory Entity Consultation - Draft Major Plan Amendment 07 Former Braddon Bowls Club (DPA-07)

OFFICIAL

Good Afternoon Tanmayi,

Thank you for the opportunity to comment on DPA-07. Please see below our comments:

- Indicative concept shows proposed tree canopy cover is only at 25%. We recommend increasing to 30% in line with the Urban Forest Strategy.
- Future DAs will require a detailed Tree Management Plan to account for the registered tree (*Quercus robur*) to the east of the block with the canopy overhanging the site.
- Habitat plantings for small woodland birds are recommended as part of landscaping. Future DAs will require species schedules for review.

Regards,

Tim Yiu

Conservation Officer

Office of the Conservator of Flora and Fauna | City and Environment Directorate

Email: Conservatorflora@act.gov.au | Ph: 6207 2751

City and Environment Directorate | ACT Government

480 Northbourne Canberra ACT 2601 | GPO Box 158 Canberra ACT 2601 | <https://www.act.gov.au/environment> | www.planning.act.gov.au

I acknowledge the Ngunnawal people as traditional custodians of the ACT and recognise any other people or families with connection to the lands of the ACT and region. I acknowledge and respect their continuing culture and the contribution they make to the life of this city and this region.

This email, and any attachments, may contain confidential information. If you are not the intended recipient please notify the sender and delete all copies of this transmission along with any attachments immediately. You should not copy or use it for any purpose, nor disclose its contents to any other person.

Please consider the environment before printing this email

From: Pagadala, Tanmayi <Tanmayi.Pagadala@act.gov.au>

Sent: Wednesday, 14 January 2026 12:06 PM

To: 'WorksApproval' <worksapproval@nca.gov.au>; ConservatorFloraFauna <ConservatorFloraFauna@act.gov.au>; EPAPanningLiaison <EPAPanningLiaison@act.gov.au>; Heritage

<Heritage@act.gov.au>; CED, DC DevelopmentCoordination <CED.DCDevelopmentCoordination@act.gov.au>

Cc: Terrplan <Terrplan@act.gov.au>; Russell, Meaghan <Meaghan.Russell@act.gov.au>; rebecca.sorensen@nca.gov.au; Taylor, Karen <Karen.Taylor@act.gov.au>; Gysen, Jits <Jits.Gysen@act.gov.au>;

OConnell, Jennifer <Jennifer.OConnell@act.gov.au>; Wyatt, Tim <Tim.Wyatt@act.gov.au>

Subject: REQUEST FOR COMMENTS BY 29 JANUARY 2026 - Mandatory Entity Consultation - Draft Major Plan Amendment 07 Former Braddon Bowls Club (DPA-07)

OFFICIAL

REQUEST FOR COMMENT

Draft Major Plan Amendment 07 (DPA-07) – Former Braddon Bowls Club

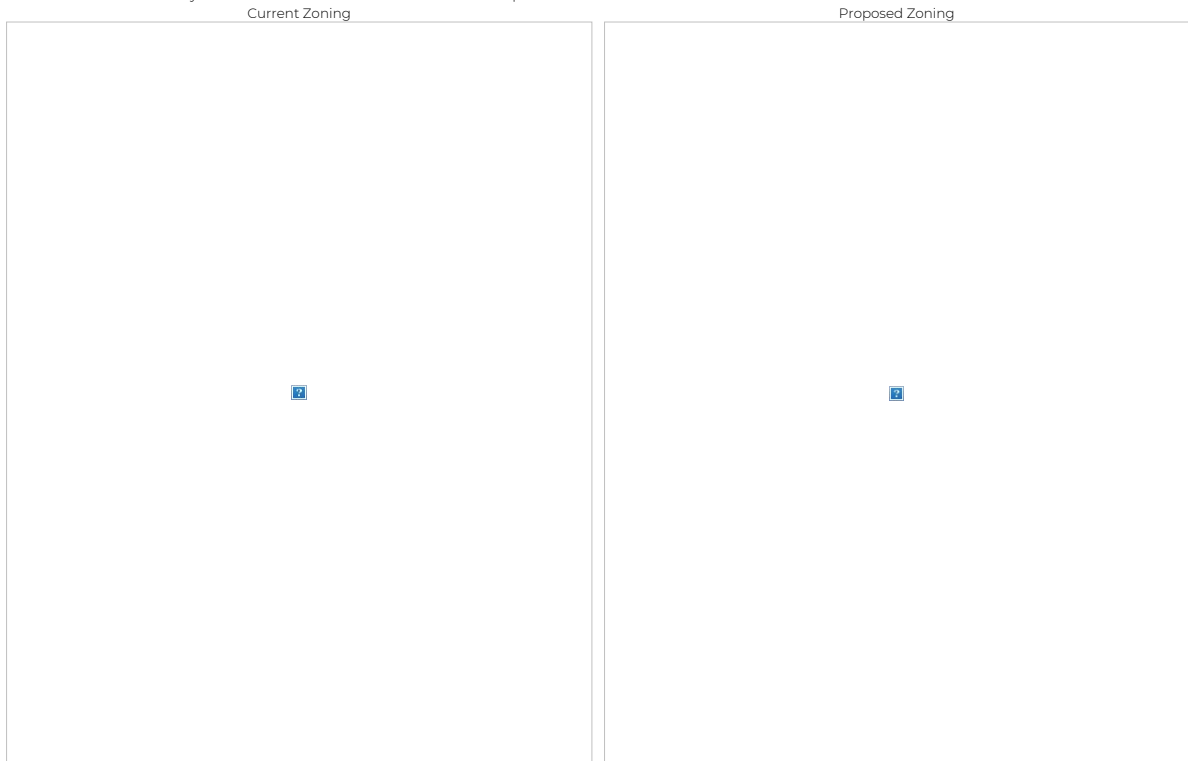
Dear Entities,

Under section 62 of the *Planning Act 2023* (the Act) the Territory Planning Authority (the Authority) must consult with mandatory entities in relation to a draft major plan amendment (DPA).

DPA-07 was placed on **public consultation on 21 November 2025 and closes on 23 January 2026**.

The Proposal

DPA-07 proposes to amend the Territory Plan map to rezone part Block 16 Section 25 Braddon (on the northern side, facing Farrer Street) from CZ6 Leisure and Accommodation Zone to RZ4 Medium Density Residential Zone to facilitate residential development on the site.



What documents are available and how can I access the documents?

The DPA document and background papers are available on the Planning website under 'Major amendments open for consultation' at: <https://www.planning.act.gov.au/professionals/our-planning-system/the-territory-plan/major-plan-amendments/major-amendments-open-for-consultation>

How to make comments and when are they due?

Your comments (including nil comments) can be sent to the TP&C by email at terrplan@act.gov.au.

Comments are due by **COB 29 January 2026**. If you require an extension, please contact TP&C prior to the due date.

What happens next?

Once matters from this consultation with entities are resolved, DPA-07 will continue to follow the statutory process set out under part 5.2 of the *Planning Act 2023*. For more information about Major Plan Amendments please see the [CED Website](#) or contact the TP&C team at terrplan@act.gov.au.

Regards,

Tanmayi on behalf of

Territory Plan and Coordination Section | General Enquiries Inbox

Email: terrplan@act.gov.au

Planning and Urban Policy Division | City and Environment Directorate | ACT Government

480 Northbourne Avenue, Dickson | GPO Box 158 Canberra ACT 2601 | www.planning.act.gov.au

From: [Patterson, Isabelle](#)
To: [Terrplan](#)
Cc: [EPAPlanningLiaison](#)
Subject: FW: REQUEST FOR COMMENTS BY 29 JANUARY 2026 - Mandatory Entity Consultation - Draft Major Plan Amendment 07 Former Braddon Bowls Club (DPA-07)
Date: Monday, 2 February 2026 11:29:04 AM
Attachments: [mmap001.doc](#)
[mmap002.doc](#)

OFFICIAL

Dear Territory Plan and Coordination Team,

Thank you for referring the draft Major Plan Amendment 07 Former Braddon Bowls Club (DPA-07) to the Office of the Environmental Protection Authority (EPA) for comments. EPA apologies for missing your requested due date.

EPA provides the following comments:

Contamination

- Prior to rezoning, an environmental assessment, in accordance with EPA endorsed guidelines, must be undertaken by a suitably qualified environmental consultant to determine whether past activities have impacted the site from a contamination perspective and to determine whether the site is suitable for the proposed commercial/residential uses.
- The consultant's assessment report into the site's suitability for the proposed and permitted uses from a contamination perspective and a letter of introduction from the land custodian and/or person/company responsible for commissioning the report detailing the purpose of the report and the action being requested, in accordance with [Contaminated Sites Information Sheet 11 – EPA Report Submission Requirements](#), must be submitted for review and endorsement **prior to the site being used for other purposes**.
 - Reports and documents relating to contamination must be submitted to EPA via contaminatedsites@act.gov.au.
 - The standard response time for reviewing documents is 15 working days from date of receipt; however, EPA endeavours to provide responses as soon as possible.
- All spoil identified at the site must be managed in accordance with EPA Guidelines for [Soil Management in the ACT](#) available at [Environment Protection Policies & Guidelines](#).
- All soil subject to disposal from the site must be assessed in accordance with EPA [Information Sheet 4 - Requirements for the reuse and disposal of contaminated soil in the ACT](#) available at [Contaminated Sites](#).
- No soil is to be disposed from the site without EPA approval.

Noise

- A noise assessment detailing possible noise impact from the adjoining recreational facilities (tennis, proposed development of outdoor recreation facility) onto the residential dwellings will be required at the DA level for the buildings.
- The assessment must incorporate required noise mitigation measures through the design and/or siting of the residences.
- The noise assessment must be submitted for review and endorsement by EPA.

For further information, ongoing correspondence, and enquiries regarding this matter, please contact EPA via EPAPlanningLiaison@act.gov.au.

Regards, Isabelle

From: Pagadala, Tanmayi <Tanmayi.Pagadala@act.gov.au>

Sent: Wednesday, 14 January 2026 12:06 PM

To: 'WorksApproval' <worksapproval@nca.gov.au>; ConservatorFloraFauna <ConservatorFloraFauna@act.gov.au>; EPAPlanningLiaison <EPAPlanningLiaison@act.gov.au>; Heritage

<Heritage@act.gov.au>; CED, DC DevelopmentCoordination <CED_DCDevelopmentCoordination@act.gov.au>

Cc: Terrplan <Terrplan@act.gov.au>; Russell, Meaghan <Meaghan.Russell@act.gov.au>; rebecca.sorensen@nca.gov.au; Taylor, Karen <Karen.Taylor@act.gov.au>; Gysen, Jits <Jits.Gysen@act.gov.au>; OConnell, Jennifer <Jennifer.OConnell@act.gov.au>; Wyatt, Tim <Tim.Wyatt@act.gov.au>

Subject: REQUEST FOR COMMENTS BY 29 JANUARY 2026 - Mandatory Entity Consultation - Draft Major Plan Amendment 07 Former Braddon Bowls Club (DPA-07)

OFFICIAL

REQUEST FOR COMMENT

Draft Major Plan Amendment 07 (DPA-07) – Former Braddon Bowls Club

Dear Entities,

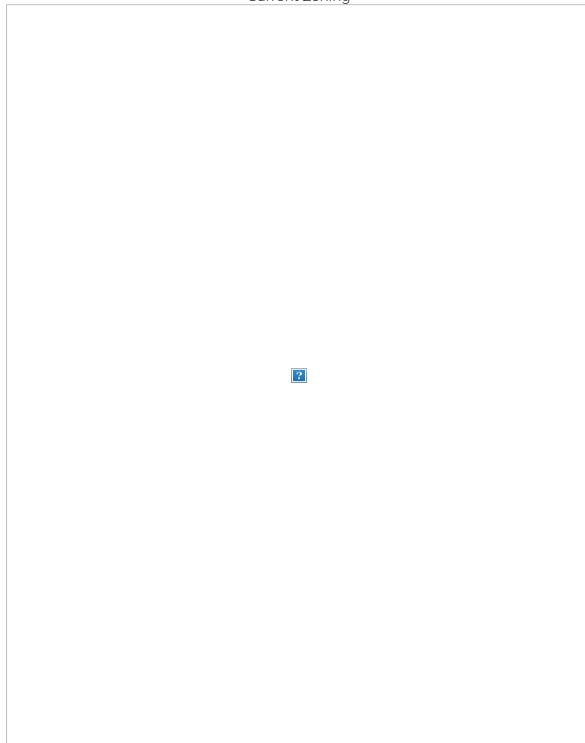
Under section 62 of the *Planning Act 2023* (the Act) the Territory Planning Authority (the Authority) must consult with mandatory entities in relation to a draft major plan amendment (DPA).

DPA-07 was placed on **public consultation on 21 November 2025 and closes on 23 January 2026**.

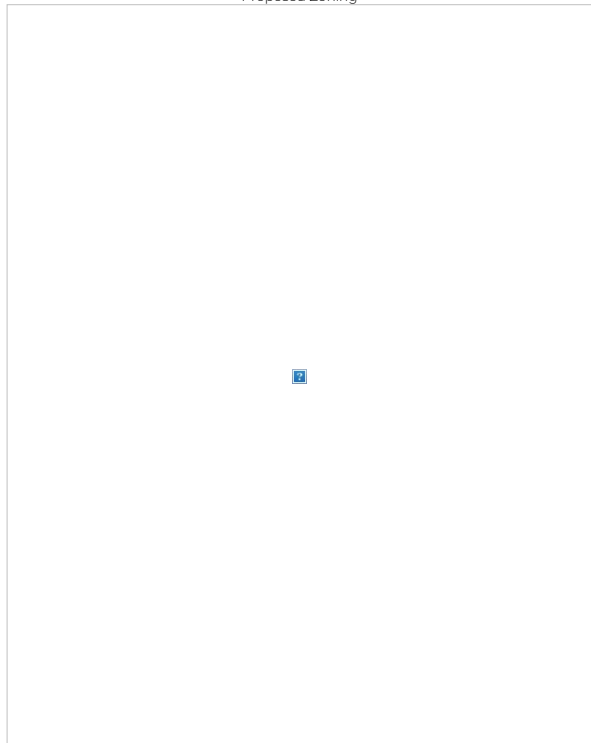
The Proposal

DPA-07 proposes to amend the Territory Plan map to rezone part Block 16 Section 25 Braddon (on the northern side, facing Farrer Street) from C26 Leisure and Accommodation Zone to RZ4 Medium Density Residential Zone to facilitate residential development on the site.

Current Zoning



Proposed Zoning



What documents are available and how can I access the documents?

The DPA document and background papers are available on the Planning website under 'Major amendments open for consultation' at: <https://www.planning.act.gov.au/professionals/our-planning-system/the-territory-plan/major-plan-amendments#major-amendments-open-for-consultation>

How to make comments and when are they due?

Your comments (including nil comments) can be sent to the TP&C by email at terrplan@act.gov.au.

Comments are due by **COB 29 January 2026**. If you require an extension, please contact TP&C prior to the due date.

What happens next?

Once matters from this consultation with entities are resolved, DPA-07 will continue to follow the statutory process set out under part 5.2 of the *Planning Act 2023*. For more information about Major Plan Amendments please see the [CED Website](#) or contact the TP&C team at terrplan@act.gov.au.

Regards,

Tanmayi on behalf of

Territory Plan and Coordination Section | General Enquiries Inbox

Email: terrplan@act.gov.au

Planning and Urban Policy Division | City and Environment Directorate | ACT Government



ACT Heritage Council

HERITAGE ADVICE

Under Part 10 of the *Heritage Act 2004*

Heritage Reference: Braddon-S25-B16
Contact Officer: KW
Received by Council: 14 January 2026
Due date: 29 January 2026

TO: Territory Plan Section
City and Environment Directorate
terplan@act.gov.au

Block:	Section:	Division / District:	Heritage Place:
16	25	Braddon	Nil

Status of Place: No Registered Heritage Places
Description of Works: Draft Major Plan Amendment – Entity Advice
Council Advice provided by: Manager (Approvals and Advice)

Pursuant to Part 10 of the *Heritage Act 2004*, the ACT Heritage Council advises that:

- The proposed draft Major Plan Amendment is **unlikely to diminish the heritage significance** of a registered heritage place.
- No heritage requirements are identified for the supporting report and future Major Plan Amendment application.

Background:

On 14 January 2026, the Territory Planning Authority (TPA) referred a proposed amendment to the Territory Plan for Block 16 Section 25 Braddon (21 Elder Street / 20 Farrer Street) to the ACT Heritage Council (Council) for entity advice.

Block 16 Section 25 Braddon is not registered on the ACT Heritage Register (the Register). However, it is located in the vicinity of two registered places, being:

- ‘Ainslie Primary and Public Schools’ (Block 50 Section 31 Braddon); and
- ‘Haig Park’ (Block 1 Section 14 Braddon).

Works affecting these blocks are subject to *Heritage Act 2004* requirements, including the heritage guidelines applicable to the conservation of the place.

The draft Major Plan Amendment (DPA-07) proposes to rezone the northern portion of the subject block from CZ6 Leisure and Accommodation to RZ4 – Medium Density Residential Zone. The rezoning of the site to RZ4 would permit a residential development on the site, resulting in a maximum four-storey height limit, site coverage and setback requirements.

To demonstrate how the new zoning may be applied to the property, the submitted documentation includes indicative massing diagrams of development concept showing thirty-eight dwellings comprising twelve townhouses and twenty-six apartments with a maximum height of 12.5 metres encircling a central courtyard and basement carpark.

To inform Council advice, the submission has been reviewed against all relevant *Heritage Act 2004* requirements, including heritage guidelines, Council policy, Council records and relevant submitted information, including ‘Major Territory Planning Amendment – Block 16 Section 25 Braddon’ prepared by Purdon Planning Pty Ltd (January 2025) and massing diagrams and 3D perspectives prepared by JUDD Studio (January 2025).

This advice is also informed by advice issued on the 27 September 2024 and 3 July 2025 as part of the pre-application process. The advice also considers the commentary provided by the Council on 22 August 2024 for the development application (DA202443065) to redevelop the southern portion of the block.

Advice:

Following a review of the submitted information, and as a Council delegate, I advise that:

1. The Major Planning Amendment is unlikely to diminish the heritage significance of Ainslie Primary and Public Schools or Haig Park, as it proposes no change to either registered heritage place.
2. Any future development application for the site should describe how the proposed outcomes respect the local heritage character and context, in accordance with the principles of good planning set out in the *Planning Act 2023*.

In relation to local character and context, the DPA-07 would result in development outcomes of appropriate bulk and scale, however, the following design considerations are also identified to ensure there are no unintended development consequences of the rezoning:

1. Any future development should provide a sympathetic design response to the local character with regard to bulk, height, scale, setting, and materiality.
2. The concept of ‘Village Green’ is supported, with the potential to enable deep root and mature landscape elements, as part of any future development.
3. Future development should consider diversity in the built typology that takes cues from the existing pattern of the development with regard to existing through site connections and linking patterns, as well as the existing landscape character. Generous setbacks from the front boundary, low-scale elements forward of the building line, and mature landscape elements are encouraged.
4. Any future development over two storeys, should explore ways to enhance the architectural expression of the new buildings through the use of a podium wall and setback at height to reduce the visual prominence of medium rise buildings in low scale residential areas. Podium walls paired with setbacks at height would allow for greater façade articulation and architectural expression that provide a sympathetic response to the local character.
5. The Council encourages to the use of landscape elements, such as hedges, tree planting and gardens as an appropriate boundary treatment in response to the broader landscape character of the local area which is emblematic of the Garden City.



Meetu Sharma Saxena
Manager (Approvals and Advice) (as delegate for),
ACT Heritage Council
29 January 2026

From: [Khatri, Rama](#)
To: [Terrplan](#)
Cc: [CED, DC DevelopmentCoordination](#); [Wyatt, Tim](#); [Henriquez, Jesse](#); [Huynh, Jai](#); [CED, DC TransportModelling](#); [CED, CP LTD&DCoord](#)
Subject: RE: REQUEST FOR COMMENTS BY 29 JANUARY 2026 - Mandatory Entity Consultation - Draft Major Plan Amendment 07 Former Braddon Bowls Club (DPA-07)
Date: Thursday, 29 January 2026 3:56:06 PM
Attachments: [image003.png](#)
[image004.tiff](#)
[image005.tiff](#)
[Mandatory Entity Consultation - Draft Major Plan Amendment \(DPA-07\) 01_2026.cbr](#)
[RF REQUEST FOR COMMENT BY FOR Friday 4 July 2025 - supporting report for a major plan amendment - Block 16 Section 25 Braddon .msg](#)

OFFICIAL

Dear Territory Planning Authority,

RE: REQUEST FOR COMMENTS BY 29 JANUARY 2026 - Mandatory Entity Consultation - Draft Major Plan Amendment 07 Former Braddon Bowls Club (DPA-07)

Thank you for referring the draft major plan amendment 07 Former Braddon Bowls Club (DPA-07) for our review.

Please note that TCCS division at CED have earlier provided comments to Territory Planning Authority for following application, which will continue to be applied for this DPA-07 as referenced in the attached documents.

- Supporting report for a major plan amendment - Block 16 Section 25 Braddon

TCCS division at CED has no further comments at this stage and has no issues on this proposed MPA provided that the proponent addresses and complies with the requirements provided earlier, including but not limited to them.

The proponent is required to initiate pre-Development Application (pre-DA) meetings to facilitate consultation and discussion on key aspects of the proposal, such as traffic, tree, waste management, stormwater, active travel infrastructure, and any potential impacts on public assets to ensure that relevant issues are identified and appropriately considered early in the planning process.

Should you require further information or have any questions please do not hesitate to contact us.

Kind Regards,

Rama Thapa Khatri

A/g Planning Coordinator | Development Assessment

Phone: 02 6205 1357 | Email: Rama.Khatri@act.gov.au

Development Coordination Branch | City and Environment Directorate | ACT Government

480 Northbourne Avenue, Dickson | GPO Box 158 Canberra ACT 2601 | www.act.gov.au/www.tcccs.act.gov.au



Please consider the environment before printing this email. If printing is necessary, print double-sided and black and white.

From: CED, DC DevelopmentCoordination

Sent: Thursday, 15 January 2026 11:25 AM

To: Pagadala, Tanmayi ; Khatri, Rama

Subject: RE: REQUEST FOR COMMENTS BY 29 JANUARY 2026 - Mandatory Entity Consultation - Draft Major Plan Amendment 07 Former Braddon Bowls Club (DPA-07)

OFFICIAL

Good morning Tanmayi,

Thank you for your email.

The Development Coordination Branch acknowledge receipt and have commenced processing your request.

Rama Khatri has been assigned and will provide a response by the deadline of **COB 29 January 2026**.

@Khatri, Rama please note that if an extension is required, please contact TP&C prior to the due date.

I have placed the relevant files in the Objective folder attached.

Kind Regards,

Alex Soper | Operational Coordinator | Customer Support and Business Improvement

Email: CED.DCDevelopmentCoordination@act.gov.au

Development Coordination Branch | City and Environment Directorate | ACT Government

480 Northbourne Ave, Dickson ACT 2602 | GPO Box 158 Canberra ACT 2601 | www.act.gov.au



From: Pagadala, Tanmayi <Tanmayi.Pagadala@act.gov.au>

Sent: Wednesday, 14 January 2026 12:06 PM

To: 'WorksApproval' <worksapproval@nca.gov.au>; ConservatorFloraFauna <ConservatorFloraFauna@act.gov.au>; EPAPanningLiaison <EPAPanningLiaison@act.gov.au>; Heritage <Heritage@act.gov.au>; CED, DC

DevelopmentCoordination <CED.DCDevelopmentCoordination@act.gov.au>

Cc: Terrplan <Terrplan@act.gov.au>; Russell, Meaghan <Meaghan.Russell@act.gov.au>; rebecca.sorensen@nca.gov.au; Taylor, Karen <Karen.Taylor@act.gov.au>; Gysen, Iits <Iits.Gysen@act.gov.au>; OConnell, Jennifer <jennifer.oconnell@act.gov.au>; Wyatt, Tim <Tim.Wyatt@act.gov.au>

Subject: REQUEST FOR COMMENTS BY 29 JANUARY 2026 - Mandatory Entity Consultation - Draft Major Plan Amendment 07 Former Braddon Bowls Club (DPA-07)

OFFICIAL

REQUEST FOR COMMENT

Draft Major Plan Amendment 07 (DPA-07) – Former Braddon Bowls Club

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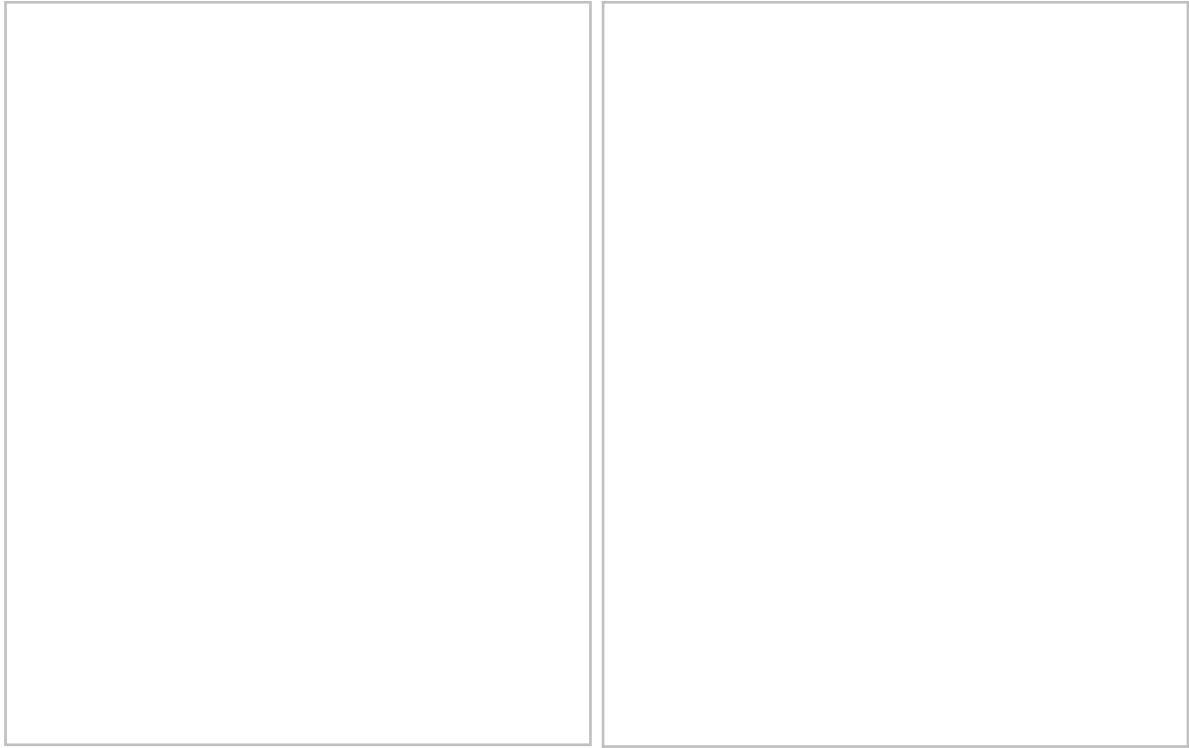
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Proposed Zoning



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Regards,

Tanmayi on behalf of

Territory Plan and Coordination Section | General Enquiries Inbox

Email: terrplan@act.gov.au

Planning and Urban Policy Division | City and Environment Directorate | ACT Government

480 Northbourne Avenue, Dickson | GPO Box 158 Canberra ACT 2601 | www.planning.act.gov.au

From: [WorksApproval](#)
To: [Terrplan](#)
Subject: RE: REQUEST FOR COMMENTS BY 29 JANUARY 2026 - Mandatory Entity Consultation - Draft Major Plan Amendment 07 Former Braddon Bowls Club (DPA-07) [SEC=OFFICIAL]
Date: Thursday, 15 January 2026 9:26:08 AM
Attachments: [image001.png](#)
[image002.png](#)

Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

OFFICIAL

Dear Territory Plan team.

Thank you for the request for comments for DPA-07 at Block 16 Section 25 Braddon. The site is zoned within the Urban Areas of the National Capital Plan (the Plan). The proposed land use amendment is not inconsistent with the Plan and the NCA has no concerns.

Kind regards

Joseph Sutton | Planning Officer
National Capital Authority
☎ (02) 6272 2989 | 📠 6273 4427

National Capital Authority | Treasury Building, King Edward Terrace, PARKES ACT 2600
GPO Box 373, CANBERRA ACT 2601 | www.nca.gov.au | Twitter: @NCA_Media

OFFICIAL

From: Pagadala, Tanmayi

Sent: Wednesday, 14 January 2026 12:06 PM

To: WorksApproval; ConservatorFloraFauna; EPAPanningLiaison; Heritage; CED, DC DevelopmentCoordination

Cc: Terrplan; Russell, Meaghan; Rebecca Sorensen; Taylor, Karen; Gysen, Jits; OConnell, Jennifer; Wyatt, Tim

Subject: REQUEST FOR COMMENTS BY 29 JANUARY 2026 - Mandatory Entity Consultation - Draft Major Plan Amendment 07 Former Braddon Bowls Club (DPA-07)

OFFICIAL

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Draft Major Plan Amendment 07 (DPA-07) – Former Braddon Bowls Club

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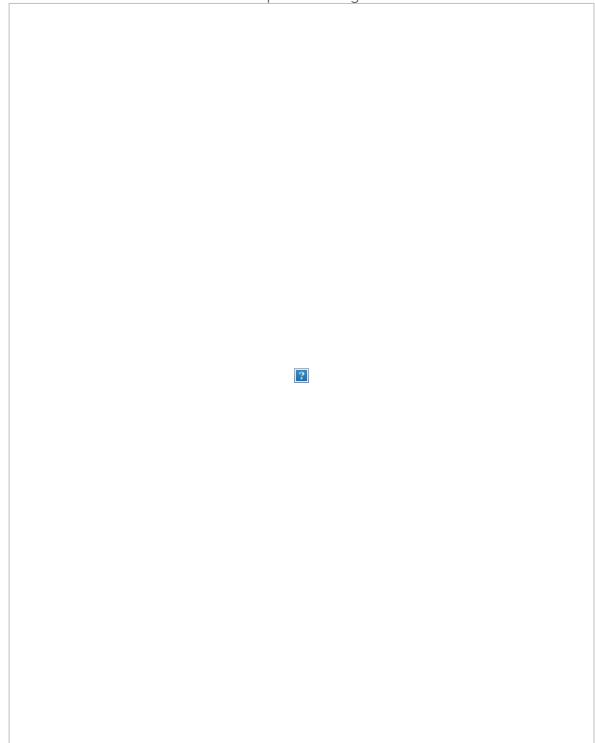
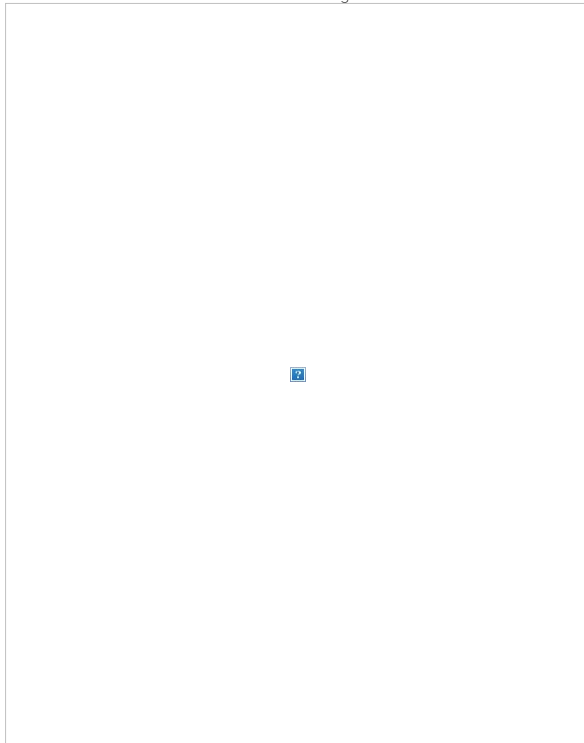
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Regards,

Tanmayi on behalf of

Territory Plan and Coordination Section | General Enquiries Inbox

Email: terrplan@act.gov.au

Planning and Urban Policy Division | City and Environment Directorate | ACT Government

480 Northbourne Avenue, Dickson | GPO Box 158 Canberra ACT 2601 | www.planning.act.gov.au

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APPENDIX 2 Comments from the public

Representation for EIS or Territory Plan Variation Notification_1 - Submission confirmation

Your submission has been successful. Please keep a copy of this receipt for your records.

Date and time

01 Dec 2025 8:35:56 AM

Reference code

F4J8C3ZD

Access Canberra

GPO Box 158
Canberra City, ACT 2601

Phone: (02) 6207 1923
acepdcustomerservices@act.gov.au

Type of representation

About this form

Use this form to lodge a representation for a current amendment to the Territory Plan or a current Environment Impact Statement during the notification period.

Application type

Please select the application type:*

Territory Plan Amendment Notification ▼

Representor details

Title

■ ▼

Given name*

■

Family name*

■

Organisation name

Enter at least one phone number: *

Home phone

Work phone

Mobile

Email address*

Application details

Amendment number*

Provide the details of your representation*

To whom it may concern: I would like to express my disgust and strong objection to the Draft Plan Amendment 07 (DPA-07) regarding the former Braddon Bowls club. My concerns regarding this application are as follows: - Why should a developer be afforded opportunities not available to other Canberra citizens. I am also a resident of Farrer St, can I also change the zoning of my RZ1 block to RZ4, allowing high density apartments on my site to maximise my profits. - The developers are clearly only wanting to change this zoning to allow them to develop this site with concepts not available under the current CZ6 zoning. That is NOT what this site was intended for. - If this block on Farrer St is re-zoned, no doubt they will apply for the same process on the Elder St side. The development application for Elder St was met with a barrage of complaints and concerns from residents. This is simply another tactic from the developers to skirt the rules and allow a high-rise development to maximise their profits without any concerns for the residents in the community. - If a re-zoning is successful, this designated community space will be lost forever. As the Missing Middle reforms continue to be implemented these community spaces designated by CZ6 zones sites will become increasingly critical for the future of Canberra and its residents. - The current zoning of this block is CZ6 which should "Provide for the development of entertainment, accommodation and leisure facilities for residents of and visitors to the ACT and surrounding region". As well as "Protect leisure and accommodation uses from competition from higher order commercial uses, and encourage activities that enhance the region's economic diversity and employment prospects". If the precedent to allow re-zoning of CZ6 to RZ4 (or other such zoning) begins, there will be no community or leisure sites remaining in Canberra. - The surrounding properties along Farrer St, Elder St, and Girrahween St are all RZ1. If any re-zoning is permitted, it should be to convert the CZ6 site to RZ1, not RZ4, to bring it in line with the street and surrounding areas. As part of the new missing middle reforms, RZ2 will soon permit 3-story dwellings 10.5m high, which are also not representative of the street-scape or amenity of the surrounding area. - Further to the above point CZ6 zoned developments should "Protect the amenity of nearby residential areas, with regards to noise, traffic, parking and privacy". If this block is rezoned to RZ4, these features would no longer apply. - The developers obviously thought they could purchase a community asset and then develop it into high rise apartments like they have in other parts of the city. If they don't want to develop the site in a suitable way for it designated CZ6 use, they should sell it to someone who intends to 'Protect leisure and accommodation uses from competition from higher order commercial uses'. There are plenty of other blocks in the city, or on Lonsdale or Mort St these developers can continue to profit from without the need to place high-rise buildings on a site intended for community use within a residential area. Regards

You may upload any additional supporting documentation or photos.

- Maximum file size is 10Mb.
 - A maximum of 5 files can be uploaded.
-

Disclaimer

Your personal information will be managed in accordance with the *Information Privacy Act 2014* and the Environment, Planning and Sustainable Development Directorate (EPSDD) [**Information Privacy Policy**](#), which is available for viewing on EPSDD's website.

Copies of written comments will be made available on the authority website unless the submission is withdrawn. Copies of written comments will also be given to the proponent of the development proposal.

If you would not like your comments or a part of your comments to be made available on the website or to the applicant, a request must be made under Sections 502 or 503 of the *Planning Act 2023* (or Sections 411 or 412 of the *Planning and Development Act 2007*). A request for exclusion under these sections must be in writing, clearly identifying what parts of your submission you are seeking to exclude and how the request satisfies the exclusion criteria.

Printed copies of the draft amendment (this document) and background documents are available for inspection and purchase at the EPSDD Customer Service Centre, 8 Darling Street, Mitchell, Monday to Friday (except public holidays) between 8:30am and 4:30pm. Please call [**\(02\) 6207 1923**](tel:0262071923) to arrange a copy for purchase.

[Click here for more information on applying for exemption from the public register.](#)

From: [REDACTED]
To: [Terroplan](#)
Subject: Objection regarding Draft Plan Amendment 07
Date: Monday, 1 December 2025 8:37:33 AM

Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern:

I would like to express my disgust and strong objection to the Draft Plan Amendment 07 (DPA-07) regarding the former Braddon Bowls club. My concerns regarding this application are as follows:

- Why should a developer be afforded opportunities not available to other Canberran citizens. I am also a resident of Farrer St, can I also change the zoning of my RZ1 block to RZ4, allowing high density apartments on my site to maximise my profits.
- The developers are clearly only wanting to change this zoning to allow them to develop this site with concepts not available under the current CZ6 zoning. That is NOT what this site was intended for.
- If this block on Farrer St is re-zoned, no doubt they will apply for the same process on the Elder St side. The development application for Elder St was met with a barrage of complaints and concerns from residents. This is simply another tactic from the developers to skirt the rules and allow a high-rise development to maximise their profits without any concerns for the residents in the community.
- If a re-zoning is successful, this designated community space will be lost forever. As the Missing Middle reforms continue to be implemented these community spaces designated by CZ6 zones sites will become increasingly critical for the future of Canberra and its residents.
- The current zoning of this block is CZ6 which should “Provide for the development of entertainment, accommodation and leisure facilities for residents of and visitors to the ACT and surrounding region”. As well as “Protect leisure and accommodation uses from competition from higher order commercial uses, and encourage activities that enhance the region's economic diversity and employment prospects”. If the precedent to allow re-zoning of CZ6 to RZ4 (or other such zoning) begins, there will be no community or leisure sites remaining in Canberra.
- The surrounding properties along Farrer St, Elder St, and Girrahween St are all RZ1. If any re-zoning is permitted, it should be to convert the CZ6 site to RZ1, not RZ4, to bring it in line with the street and surrounding areas. As part of the new missing middle reforms, RZ2 will soon permit 3-story dwellings 10.5m high, which are also not representative of the street-scape or amenity of the surrounding area.
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Regards

[Redacted]
[Redacted]

Representation for EIS or Territory Plan Variation Notification_1 - Submission confirmation

Your submission has been successful. Please keep a copy of this receipt for your records.

Date and time

01 Dec 2025 2:01:05 PM

Reference code

LBPM4DBN

Access Canberra

GPO Box 158
Canberra City, ACT 2601

Phone: (02) 6207 1923
acepdcustomerservices@act.gov.au

Type of representation

About this form

Use this form to lodge a representation for a current amendment to the Territory Plan or a current Environment Impact Statement during the notification period.

Application type

Please select the application type:*

Territory Plan Amendment Notification



Representer details

Title

Given name*

Family name*

Organisation name

Enter at least one phone number: *

Home phone

Work phone

Mobile

Email address*

Application details

Amendment number*

Provide the details of your representation*

I hereby lodge our very strong objection to the proposed amendment. I do so on the following grounds: The developers are clearly only wanting to change this zoning to allow them to develop this site with concepts not available under the current CZ6 zoning. That is NOT what this site was intended for. They propose to develop a 4-6 Storey hotel/apartment block to which I strongly object for the following reasons. The size at 6 stories is totally inconsistent with surrounding residential and other land uses and will alter the heritage nature of one of Canberra's oldest suburbs. Located as it is, directly opposite a 100-year-old primary school will impact the safety of the children attending and detract massively from the heritage school's peaceful enjoyment of their site. The increase in traffic will overwhelm the street and adjoining intersections, particularly the Limestone Avenue intersection. While the zoning as "commercial" exists, this was in the context of a small club with large spaces for bowling greens. What the developers amendment is designed to do is to make the site more suited to the "commercial" zoning as in Lonsdale Street - this is not appropriate in the middle of a residential and school environment. If this block on Farrer St is re-zoned, no doubt the developer will apply for the same process on the Elder St side. The development application for Elder St was met with a barrage of complaints and concerns from residents. This is simply another tactic from the developers to skirt the rules and allow a high-rise development to maximise their profits without any concerns for the nature of surrounding residents and community.

You may upload any additional supporting documentation or photos.

- Maximum file size is 10Mb.
 - A maximum of 5 files can be uploaded.
-

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Representation for EIS or Territory Plan Amendment Notification - Submission confirmation

Your submission has been successful. Please keep a copy of this receipt for your records.

Date and time

12 Jan 2026 5:53:47 PM

Reference code

FH3K8TTV

Access Canberra

GPO Box 158
Canberra City, ACT 2601

Phone: (02) 6207 1923
acepdcustomerservices@act.gov.au

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Please select the application type:*

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Representor details

Title

Given name*

Family name*

Organisation name

Enter at least one phone number: *

Home phone

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Email address*

Application details

Amendment number*

Provide the details of your representation*

Dear Sir/Madam

RE: Draft Plan Amendment 07 Former Braddon Bowls Club (DPA-07) to rezone part of Block 16 Sections 25 from CZ6 to RZ4

I am replying to the invitation to respond to the above re-zoning application. As a long-standing resident of Farrer Street in Braddon, and impacted neighbour of the above proposal, I offer the following observations and feedback:

I strongly object to this proposal, as it will allow development completely out of all proportion to the surrounding residences (which are limited to 2 stories).

This developer has submitted multiple DA applications for this site (inclusive of the Elder Street side), each application demonstrating their desire to develop the site(s) beyond reasonable scale to the surrounds. RZ4 zoning will allow such development to run unchecked.

RZ4 zoning runs counter to the views very clearly expressed by the community in their multiple rebuttals to this developer's attempts to maximise profit for this block and override the amenity of local residents in the process. The community has continually advocated for development in keeping with the scale, bulk, height and design of its surrounds.

I am concerned that the former Braddon Bowling Club site has been divided into 2 blocks, yet this rezoning application targets just 1 site. All previous plans by this developer have included the entire block. I object to these 2 blocks being developed as 'stand-alone' projects, when quite clearly they are inextricably intertwined. The community should have the right to consider this area as a whole. The developer might then wish to undertake development in 2 stages, from a cost perspective, but the community needs to consider the plans for both sites simultaneously. Consequently, I submit that this re-zoning application be rejected and the developer be required to submit all planned applications to change zoning for both sites simultaneously.

Why is this developer being granted potential re-zoning when ironically, neighbouring residential properties of approx. 1,400 square metres are being refused the ability to subdivide their blocks, and are limited to placing one 120 square metre (max) 2nd dwelling on their blocks! How does the ACT Government reconcile these inconsistencies?

Changes to zoning will result in this developer being allowed to build something far exceeding the bulk and scale of the surrounding landscape. The proposal to change the zoning will result in development out of all proportion to the precinct. Elder St and Farrer St are RZ1 residential, with a height restriction of 2 storeys and blocks of approx. 1,400 square metres that cannot be sub-divided. The exceptions are community services/facilities - a school, a childcare centre, a church & a tennis club. All of these community facilities are 1-2 storeys, and servicing a local residential community. They sit in contrast to Mort St & Lonsdale St, which are purposefully commercial and medium-to-high density apartments.

The current CZ6 - Leisure and Accommodation Zone Objectives, see below, protect the amenity of residents and ensure compatibility with the surrounding landscape. A change in zoning to RZ4 medium density will strip residents of this protection and allow this developer to build something far exceeding the bulk and scale of the surrounds. CZ6 zoning

- a) Provide for the development of entertainment, accommodation and leisure facilities for residents of and visitors to the ACT and surrounding region
- b) Protect leisure and accommodation uses from competition from higher order commercial uses, and encourage activities that enhance the region's economic diversity and employment prospects

- c) Ensure leisure and accommodation facilities have convenient access to public transport
- d) Protect the amenity of nearby residential areas, with regard to noise, traffic, parking and privacy
- e) Ensure the location of facilities, and their design and landscaping is compatible with environmental values
- f) Ensure that the bulk, scale, size, design and landscaping of development is compatible with the surrounding landscape
- g) Encourage activity at street frontage level and provide an appropriate level of surveillance of the public realm”

Changes to zoning will drastically impact the rights of existing residents to enjoy their leases. RZ4 zoning would allow construction 4 times the size of surrounding dwellings.


Attendant increases in traffic would not be proportionate to the surrounding residential usage.

I note that the original community consultation for this whole site overwhelmingly supported 2 storey townhouses that would be consistent with the RZ1 residential zoning and cater for a largely unmet need in the community for townhouses that also enabled ageing-in-place. This can be achieved under the current RZ1 zoning, while simultaneously affording existing leaseholders protection against this developer.

I am sure the local Braddon community would strongly support revisiting this original proposal and lobbying the ACT Government to make it financially viable for the developer to meet this un-met community need.

Thank you for this opportunity to present my objections.

Sincerely

 Braddon ACT

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[REDACTED]
[REDACTED]
[REDACTED]

15 January 2026

Chief Executive
Territory Planning Authority
G.P.O. Box 158
CANBERRA. A.C.T. 2601

Dear Sir/Madam,

**RE: Draft Major Plan Amendment to the Territory Plan 2023
Former Braddon Bowls Club**

I have an equitable half interest in [REDACTED], Braddon and I am authorised by the registered property owner, [REDACTED] to make this submission. Our unit is [REDACTED] [REDACTED] – the former Braddon Bowling Club. It is occupied and used regularly by ourselves and our extended family. We therefore have a keen interest in the proposed rezoning of the northern half of Section 25 fronting Farrer Street and the development application for the southern half fronting Elder Street.

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

We wish to have the peaceful ambiance and character of this low density residential part of Braddon maintained.

Our preference would be for Section 25 to become a dedicated public park with a playground. As there is an adjacent child care centre, it 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 and a distance that would seem to a 2 or 3 year old to be too far. (We do not have a family or commercial interest in the child care centre. We would use a park in that location.)

If the land is to be rezoned for residential use, then we submit that the appropriate zone for this land is **RZ2**, which currently allows single and two story dwellings, including attached dwellings, with 45% site coverage. Residential buildings of this type would be consistent

with the streetscape, amenity and heritage of Farrer Street while providing a substantial amount of additional housing that is close to the City Centre, transport and other amenities.

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.)

We submit that buildings that are 12.5 metres high (and according to the Purdon Report submitted with Syzygy's rezoning application - 4 storeys) is inconsistent with the character, amenity and heritage of Farrer Street and Elder Street. Buildings that are 12.5 metres high would stand well above all the other dwellings in Farrer and Elder Streets and dominate the area. A residential development of the type illustrated and described in the plan as "indicative" on page 23 of the Purdon Report would be of a height that is inappropriate for the characteristics and amenity of the surrounding area.

Further, 3 or 4 story buildings would carry a high risk of overshadowing and overlooking the property adjacent to the eastern boundary of the subject land with a reduction in sunlight and loss of privacy. (The indicative plan for the development shows a long 4 storey building right against this boundary.)

Also, 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.

Yours faithfully,



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15 Jan 2026 3:23:23 PM

Reference code

X56HCZT9

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Amendment number*

Provide the details of your representation*

We hereby lodge our very strong objection to the proposed Draft Plan Amendment 07 – Former Braddon Bowls Club (DPA-07). We do so on the following grounds.

The purpose of the amendment application is to provide for the development of a 4-6 stories commercial hotel which is totally inconsistent with surrounding residential and other land uses and will alter the heritage nature of one of Canberra's oldest suburbs. It will also open up for such a development in Elder St. This location is directly opposite a 100-year-old primary school will impact the safety of the children attending and detract massively from the heritage school's peaceful enjoyment of their site.

The increase in traffic will overwhelm both streets and adjoining intersections, particularly at the Limestone Avenue intersection. The statement by the earlier traffic report that:

“The additional traffic generated by the site is considered low in the context of existing peak hour traffic volumes. The SIDRA analysis indicates there will be no perceptible impacts to traffic conditions at the Elder Street / Elouera Street intersection and the critical gap assessment indicates the additional site generated traffic can be appropriately accommodated at the Limestone Avenue intersection”

is ludicrous and traffic will increase dramatically and lead to blockages and danger to school children especially.

While the zoning as “commercial” exists, this was in the context of a small club with large spaces for bowling greens. What this amendment is providing for is more suited to the “commercial’ zoning in Lonsdale Street, not in the middle of a residential and school environment. The landscape is now proposed to be vastly different, and much more densely built out than was envisaged by the proposed use when the original zoning was approved.

The future development of the site should be considered in conjunction with the proposed amendment and rejected as totally unsuited to the surrounding area.

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16 Jan 2026 8:41:04 PM

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NFDNQHWW

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Amendment number*

Provide the details of your representation*

Submission of Objection

Proposed Major Plan Amendment – Block 16 Section 25 Braddon
Amendment 07 (DPA-07)

Rezoning from CZ6 Leisure and Accommodation to RZ4 Medium Density Residential

To: ACT Planning and Land Authority
Environment, Planning and Sustainable Development Directorate

From: [REDACTED]
[REDACTED]

Date: 16/01/2026

We are the owners and occupiers of a single-dwelling residential property located [REDACTED] the subject site at Block 16 Section 25 Braddon (former Braddon Bowls Club). We make this submission to formally object to the proposed Major Territory Plan Amendment seeking to rezone the land from CZ6 – Leisure and Accommodation to RZ4 – Medium Density Residential.

Our objection is grounded in planning law principles, environmental and amenity impacts, traffic and safety considerations, cumulative development effects, and failure to properly address the existing and established residential character of Farrer Street.

2. Incompatibility with Established Low-Density Residential Character

Farrer Street is characterised by detached, single-dwelling homes with generous setbacks, mature street trees, and a low-traffic, low-noise residential environment. This character is not incidental; it is deliberate and protected through long-standing planning controls.

While the proponent asserts that RZ4 zoning is “sensitive” to surrounding development, this assertion is not supported by the factual context on the ground. A development envelope of up to four storeys (12.5m) with up to 38 dwellings represents a fundamental and irreversible shift in built form, scale, intensity, and residential density that is entirely inconsistent with the prevailing streetscape.

The proposal would create a precedent for further up-zoning and densification in a street that has never been identified as an appropriate medium-density corridor. This is contrary to sound planning practice and undermines certainty for existing residents.

3. Traffic, Congestion and Parking Impacts – Failure to Properly Assess

The proposal materially understates traffic impacts and defers proper analysis to a future development application, which is inappropriate at the rezoning stage.

Key concerns include:

- Farrer Street already experiences restricted on-street parking, particularly during:
 - o childcare drop-off and pick-up periods at the adjoining childcare centre.
 - o school-related traffic associated with nearby educational facilities.
 - o evening and weekend residential demand.
- The indicative concept proposes 38 dwellings, which conservatively equates to:
 - o 60–80 additional vehicle movements per day.
 - o concentrated peak-hour congestion directly outside our home.
- The proposal relies heavily on theoretical proximity to public transport yet provides no evidence that

future residents will not rely on private vehicles, particularly families, trades, delivery services, carers, and visitors.

Critically, no cumulative traffic assessment has been undertaken that considers:

- the already approved high-intensity development on the southern portion of the site.
- the childcare centre.
- existing residential traffic loads.
- constrained street widths and on-street parking demand.

This omission is inconsistent with the ACT Transport Strategy and principles of integrated transport planning.

4. Child Safety and Amenity Impacts Adjacent to a Childcare Centre

The subject site directly adjoins a childcare centre, a highly sensitive land use that relies on predictable, low-speed traffic conditions and safe pedestrian environments.

Increased residential density will:

- intensify vehicle movements during peak childcare hours.
- increase conflict between vehicles, pedestrians, and children.
- degrade the safety and amenity of an already constrained local street network.

The proposal fails to meaningfully address these risks, instead deferring them to later stages. This is unacceptable given the foreseeable impacts.

5. Environmental and Urban Heat Impacts

Although the report references climate and sustainability policies, it fails to address site-specific environmental consequences, including:

- loss of existing open, permeable land contributing to local cooling.
- increased hard surfaces and urban heat island effects.
- increased stormwater runoff into an already established residential drainage system.

Reliance on future development applications to “address” these impacts is insufficient. Rezoning decisions must consider worst-case development outcomes, not aspirational design responses.

6. Failure to Protect Residential Amenity (Noise, Privacy, Overshadowing)

Medium-density development at this scale will inevitably result in:

- increased noise from vehicle movements, residents, visitors, waste collection and servicing.
- overlooking and loss of privacy into adjoining and opposite dwellings.
- overshadowing impacts inconsistent with the established low-rise character.

The proponent’s assertion that RZ4 outcomes are “more respectful” than CZ6 alternatives is speculative and does not justify introducing a fundamentally incompatible residential typology into a quiet suburban street.

7. Property Value and Reasonable Residential Expectations

While property value impacts are often dismissed as “non-planning considerations,” loss of residential amenity is a recognised and legitimate planning concern.

The introduction of medium-density development of this scale will:

- materially alter the character and liveability of Farrer Street.
- reduce buyer demand for detached homes in a previously low-density environment.

- undermine the reasonable expectations of residents who purchased under an established planning framework.

Planning systems exist to balance growth with certainty. This proposal fails that balance.

8. Procedural and Strategic Concerns

This proposal represents incremental rezoning by stealth, enabled only because the site is a former community use. The surrounding residential streets were never identified in strategic planning documents as suitable for medium-density intensification.

Rezoning this site in isolation, without a broader neighbourhood structure plan or traffic strategy, is piecemeal planning and contrary to best-practice planning principles.

9. Conclusion and Requested Outcome

For the reasons outlined above, we respectfully submit that the proposed Major Plan Amendment:

- is incompatible with the established low-density residential character of Farrer Street.
- will result in unacceptable traffic, parking, safety and amenity impacts.
- fails to adequately assess cumulative and environmental effects.
- undermines residential certainty and community wellbeing.

We therefore request that the proposed rezoning to RZ4 be refused.

In the alternative, should any amendment proceed, we submit that:

- any rezoning should be limited to a lower-intensity residential zone consistent with surrounding RZ1 character; and
- comprehensive traffic, parking, safety and cumulative impact assessments must be completed prior to any change in zoning.

Sincerely,

[Redacted Signature]

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STATUTORY OBJECTION.pdf
Submission of Objection.pdf

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STATUTORY OBJECTION

Proposed Major Territory Plan Amendment

Block 16 Section 25 Braddon (Former Braddon Bowls Club)

Rezoning from CZ6 to RZ4 – Medium Density Residential

This submission objects to the proposed Major Territory Plan Amendment on the basis that it **fails to satisfy mandatory statutory requirements** under the **Planning Act 2023 (ACT)** and would result in **unacceptable and foreseeable impacts** on residential amenity, safety, traffic conditions and planning certainty.

Key Statutory Grounds

1. Failure to Meet the Objects of the Act (Planning Act 2023, s 6)

The proposal is inconsistent with the objects of the Act, including the requirements to:

- promote **orderly and sustainable development** (s 6(a));
- protect **community health, safety and wellbeing** (s 6(b));
- ensure development is **appropriate to its context** (s 6(c));
- provide **certainty, transparency and consistency** in planning decisions (s 6(d)).

The proposed rezoning enables a scale and intensity of development incompatible with the established low-density residential character of Farrer Street and adjacent sensitive land uses.

2. Absence of Orderly and Proper Planning (ss 7–8)

The rezoning represents **piecemeal planning**, undertaken without:

- a precinct-wide structure plan;
- an integrated traffic and parking strategy;
- consideration of long-term and cumulative neighbourhood impacts.

This approach does not meet the statutory requirement for orderly and proper planning.

3. Inadequate Protection of Residential Amenity and Safety (s 9)

The proposal fails to adequately protect existing residential amenity and safety, with foreseeable impacts including:

- increased traffic congestion and parking pressure;
- heightened safety risks adjacent to a childcare centre;
- increased noise, overlooking and loss of privacy;
- degradation of the quiet residential character of the street.

These impacts arise directly from the zoning change and must be assessed at this stage.

4. Failure to Assess Cumulative Impacts (s 10)

The proposal does not adequately consider cumulative impacts, including:

- interaction with the already approved high-intensity development on the southern portion of the same block;
- existing childcare and school-related traffic pressures;
- limited on-street parking and constrained road capacity.

This omission represents a material deficiency under the Act.

5. Inappropriate Deferral of Critical Matters (ss 56–59)

The Planning Act requires Territory Plan amendments to consider **reasonably foreseeable development outcomes**.

Deferring traffic, parking, safety and amenity impacts to a future development application is procedurally inappropriate where those impacts are inherent to the rezoning itself.

Conclusion

Having regard to the **Planning Act 2023 (ACT)**, the proposed Major Plan Amendment:

- does not promote orderly and proper planning;
- fails to adequately protect community amenity and safety;
- inadequately assesses cumulative impacts;
- undermines planning certainty and equity.

Requested Outcome

Refusal of the proposed rezoning to RZ4.

In the alternative, any amendment should be limited to a lower-intensity residential zone consistent with surrounding development and supported by comprehensive traffic, parking and cumulative impact assessments **prior** to any zoning change.

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20 Jan 2026 10:02:42 AM

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Provide the details of your representation*

Draft Plan Amendment 07 – Former Braddon Bowls Club (DPA-07).

Dear Sir / Madam,

I am a resident of Farrer Street in Braddon, and as such have some concern over the amendment proposed. Firstly, I am supportive of development on this site. The developer has purchased the land and I look forward to seeing a development that meets the needs of the community and enhances our beautiful streetscape. The proposed zoning to RZ4 (6 storeys) however is too large for a suburban street comprised of family homes. RZ3 Residential Transition Zone which limits building heights to 4 storeys would seem more appropriate. Whilst we appreciate we have chosen to live on the City fringe, we do so with the knowledge that our area is not zoned for this scale of housing / commercial developments. The reality of such a zoning change being granted, is a significant change in the way the street operates.

The particular concerns I have are:

1. Traffic flow. Where do vehicles enter the development from, and how do they access car parking? One of the attractions of Farrer Street is that it is not a main conduit to the Braddon Precinct. This is supported by the traffic flow report. The report would suggest that traffic on the street is primarily residents and this would be altered considerably should a development of this nature proceed. I would also be interested to know if the current limitations on parking in the street would be maintained. I imagine my family will be unlikely to find parking at their own home should this proceed.
 2. The Common Property accessway looks like it is to link the proposed Elder Street development. That would indicate the provision of a new road, referenced as Farrer Lane? I do not believe that is acceptable. I live directly opposite and traffic through that zone will impact on our day to day significantly.
 3. A development so close to free standing home of 6 storeys is not appropriate. It is extremely invasive for the owners of the adjacent property.
 4. The development outcomes listed in the Purdon report are specifically prepared for the developer and give no consideration to the current resident. The report stipulates in their technical compliance at 5.2.2 that the building height would be 12.5 metres (maximum 4 storeys). This proposal could be achieved through the approval of RZ3 Residential Transition zoning. Approval of RZ4 would allow an additional 2 storeys which is no doubt a consideration for the developer when finalising drawings for built form and development approval. A concept plan is no guarantee of the end product. A zoning of RZ3 is.
 5. The height of the building should not exceed the existing tree canopy.
- Zoning is critical to the preservation of the street scape Farrer Street offers. There is no need to bring such a large proposal into the heart of suburbia. As mentioned, I support development, but there needs to be sensible outcomes that consider the existing residential sector. It would appear this is a great opportunity to support the missing middle concept and develop some low level townhouse type developments that do not exceed what is a reasonable height for suburbia.

Sincerely,

[Redacted signature]

Braddon

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Provide the details of your representation*

I would like to express my strong objection to the Draft Plan Amendment 07 (DPA-07) regarding the former Braddon Bowls club. My concerns regarding this application are as follows:

- If the block on Farrer St is re-zoned, no doubt an application to do the same will be forthcoming on the Elder St side. The last development application for Elder St was met with a barrage of complaints and concerns from residents. This is an attempt by the owners to use another tack and allow a high-rise development to maximise their profits with little concern for the existing residents of the community.
- This zoning change will allow development of this site with concepts not available under the current CZ6 zoning. That is NOT what this site was intended for.
- If this re-zoning request is successful, this designated community space will be lost forever. As the missing middle reforms continue to be implemented these community spaces designated by CZ6 zones will become increasingly critical for the future of Canberra and its residents.
- The current zoning of this block is CZ6 which should "Provide for the development of entertainment, accommodation and leisure facilities for residents of and visitors to the ACT and surrounding region". As well as "Protect leisure and accommodation uses from competition from higher order commercial uses, and encourage activities that enhance the region's economic diversity and employment prospects". Should the precedent to allow re-zoning of CZ6 to RZ4 (or other such zoning) is granted – it will start an erosion of community or leisure sites remaining in Canberra, this would be to the detriment of all Canberra residents.
- To stay in line with the surrounding properties along Farrer St, Elder St, and Girrahween St. Any re-zoning (while not supported), should be to convert the CZ6 site to RZ1, not RZ4. As part of the new missing middle reforms, RZ2 will soon permit 3-story dwellings 10.5m high, which are also not representative of the street-scape or amenity of the surrounding area.
- Further to the above point CZ6 zoned developments should "Protect the amenity of nearby residential areas, with regards to noise, traffic, parking and privacy". If this block is rezoned to RZ4, these guidelines would no longer apply.
- The owners clearly thought that 'land-banking' this community asset with a future intent of developing it for maximum profit was a god business plan. Should the owners not wish to develop the space in accordance with the designated CZ6 rules, then it should be put back to the market.

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Printed copies of the draft amendment (this document) and background documents are available for inspection and purchase at the EPSDD Customer Service Centre, 8 Darling Street, Mitchell, Monday to Friday (except public holidays) between 8:30am and 4:30pm. Please call [\(02\) 6207 1923](tel:0262071923) to arrange a copy for purchase.

[Click here for more information on applying for exemption from the public register.](#)

Exemption from the public register

To approve your request to exempt all or part of your representation from the public register the Territory Planning Authority must be satisfied that the part of the representation to which your exclusion application relates contains information that:

- (a) the publication of which would disclose a trade secret; or
- (b) the publication of which would, or could reasonably be expected to
 - (i) endanger the life or physical safety of any person; or
 - (ii) lead to damage to, or theft of, property.

Please note: Completing this section does not guarantee your application for exemption from the public register will be approved. A customer service officer will contact you to discuss any request for exemption from the public register.

Do you want to apply to have all or part of your representation excluded from the public register?*

- Yes No

Provide details of your exemption request*

N/A

Representation for EIS or Territory Plan Amendment Notification - Submission confirmation

Your submission has been successful. Please keep a copy of this receipt for your records.

Date and time

20 Jan 2026 6:51:38 PM

Reference code

CM36V33R

Access Canberra

GPO Box 158
Canberra City, ACT 2601

Phone: (02) 6207 1923
acepdcustomerservices@act.gov.au

Type of representation

About this form

Use this form to lodge a representation for a current amendment to the Territory Plan or a current Environment Impact Statement during the notification period.

Application type

Please select the application type:*

Territory Plan Amendment Notification

Representor details

Title

Given name*

Family name*

Organisation name

Enter at least one phone number: *

Home phone

Work phone

Mobile

Email address*

Application details

Amendment number*

Provide the details of your representation*

[REDACTED]
Block and section number: [REDACTED]

(Note: We are next door neighbours to proposed Draft Major Plan Amendment 07)

ACT Planning and Land Authority
Environment, Planning and Sustainable Development Directorate (EPSDD)

Re: Draft Major Plan Amendment 07 (DPA-07), Block 16 Section 25 Braddon (formerly the Canberra City Bowling Club)

Proposed rezoning of (northern part of) the block to RZ4

We object to DPA-07. As next-door neighbours of Block 16, we are deeply concerned that DPA-07 has been formulated and web-posted without direct contact with us.

We understand that DPA-07 if approved would enable dense development of the northern (Farrer St) part of Block 16 up to 4 to 6 stories of built facilities. Farrer St has a well-preserved, original Canberra broad residential streetscape, lined by mature London Plane Trees. Surrounding residential leases on Farrer St, Elder St and Girrahween St, between Fawkner St and Limestone Avenue, are zoned RZ1. The Block 16 leaseholder should be required to "protect the amenity of nearby residential areas, with regard to noise, traffic, parking and privacy". This would best be achieved by limiting any rezoning to no more than 2 storey development of the northern part of Block 16.

If approved, Block 16 structures would overshadow and overlook our lease [REDACTED]. Our residential amenity and right to the quiet enjoyment of our lease would be severely negatively impacted. Furthermore, our lease has a registered English Oak tree [REDACTED] Block 16.

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."

Within these prescriptions, the leaseholder of Block 16 must not compromise the integrity of the registered oak tree on our block; yet the "massing study" accompanying DPA-07 shows a proposed new laneway within the oak tree's protection zone.

This submission is without prejudice to any further representation(s) we may make.
We have also signed a comprehensive joint neighbourhood submission.

(Signed) [REDACTED]
20 January 2026

You may upload any additional supporting documentation or photos.

- Maximum file size is 10Mb.
- A maximum of 5 files can be uploaded.

SCAN0411.JPG

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[REDACTED]
Block and section number: [REDACTED]

(Note: We are next door neighbours to proposed Draft Major Plan Amendment 07)

ACT Planning and Land Authority
Environment, Planning and Sustainable Development Directorate (EPSDD)

Re: Draft Major Plan Amendment 07 (DPA-07), Block 16 Section 25 Braddon (formerly the Canberra City Bowling Club)

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If approved, Block 16 structures would overshadow and overlook our lease (Block 1 Section 25). Our residential amenity and right to the quiet enjoyment of our lease would be severely negatively impacted.

Furthermore, our lease has a registered English Oak tree overhanging Block 16.

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
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(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."

Within these prescriptions, the leaseholder of Block 16 must not compromise the integrity of the registered oak tree on our block; yet the "massing study" accompanying DPA-07 shows a proposed new laneway within the oak tree's protection zone.

This submission is without prejudice to any further representation(s) we may make. We have also signed a comprehensive joint neighbourhood submission.

[REDACTED]
20 January 2026

From: [REDACTED]
To: [Teroplan](#)
Subject: Block 16 section 25 Braddon
Date: Wednesday, 21 January 2026 4:23:20 PM

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To whom it may concern:

I would like to express my strong objection to the Draft Plan Amendment 07 (DPA-07) regarding the former Braddon Bowls club. My concerns regarding this application are as follows:

- Why should a developer be afforded opportunities not available to other Canberran citizens. I am also a resident of Farrer St, can I also change the zoning of my RZ1 block to RZ4, allowing high density apartments on my site to maximise my profits.
- The developers are clearly only wanting to change this zoning to allow them to develop this site with concepts not available under the current CZ6 zoning. That is NOT what this site was intended for.
- If this block on Farrer St is re-zoned, no doubt they will apply for the same process on the Elder St side. The development application for Elder St was met with a barrage of complaints and concerns from residents. This is simply another tactic from the developers to skirt the rules and allow a high-rise development to maximise their profits without any concerns for the residents in the community.
- If a re-zoning is successful, this designated community space will be lost forever. As the Missing Middle reforms continue to be implemented these community spaces designated by CZ6 zones sites will become increasingly critical for the future of Canberra and its residents.
- The current zoning of this block is CZ6 which should "Provide for the development of entertainment, accommodation and leisure facilities for residents of and visitors to the ACT and surrounding region". As well as "Protect leisure and accommodation uses from competition from higher order commercial uses, and encourage activities that enhance the region's economic diversity and employment prospects". If the precedent to allow re-zoning of CZ6 to RZ4 (or other such zoning) begins, there will be no community or leisure sites remaining in Canberra.
- The surrounding properties along Farrer St, Elder St,

and Girrahween St are all RZ1. If any re-zoning is permitted, it should be to convert the CZ6 site to RZ1, not RZ4, to bring it in line with the street and surrounding areas. As part of the new missing middle reforms, RZ2 will soon permit 3-story dwellings 10.5m high, which are also not representative of the streetscape or amenity of the surrounding area.

- Further to the above point CZ6 zoned developments should "Protect the amenity of nearby residential areas, with regards to noise, traffic, parking and privacy". If this block is rezoned to RZ4, these features would no longer apply.
- The developers obviously thought they could purchase a community asset and then develop it into high rise apartments like they have in other parts of the city. If they don't want to develop the site in a suitable way for its designated CZ6 use, they should sell it to someone who intends to 'Protect leisure and accommodation uses from competition from higher order commercial uses'. There are plenty of other blocks in the city, or on Lonsdale or Mort St these developers can continue to profit from without the need to place high-rise buildings on a site intended for community use within a residential area.

Regards

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: [REDACTED]
To: [Terrplan](#)
Subject: Objection to Draft Major Plan Amendment 07 (DPA-07), Block 16 Section 25 Braddon
Date: Thursday, 22 January 2026 11:13:01 AM
Attachments: [Bowlo objection 1-26.docx](#)

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[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

ACT Planning and Land Authority

Environment, Planning and Sustainable Development Directorate (EPSDD)

Dear Sir/Madam

Draft Major Plan Amendment 07 (DPA-07), Block 16 Section 25 Braddon

I am writing to object to Major Plan Amendment 07 (DPA-07), Block 16 Section 25 Braddon. If approved this would enable dense development of the Farrer St part of Block 16 up to 4 to 6 stories of built facilities. Farrer St has a well-preserved, original Canberra broad residential streetscape, lined by mature London Plane Trees. Surrounding residential leases on Farrer St, Elder St and Girrahween St, between Fawkner St and Limestone Avenue, are zoned RZ1. The Block 16 leaseholder should be required to protect the amenity of nearby residential areas, with regard to noise, traffic, parking and privacy This would best be achieved by limiting any rezoning to no more than a 2 storey development of the northern part of Block 16.

The subsequent development as well as being out of character would severely disrupt the working and ambience of the entire neighborhood.

Yours faithfully

[REDACTED]

22 January 2026

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

ACT Planning and Land Authority

Environment, Planning and Sustainable Development Directorate (EPSDD)

Dear Sir/Madam

Draft Major Plan Amendment 07 (DPA-07), Block 16 Section 25 Braddon

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The subsequent development as well as being out of character would severely disrupt the working and ambience of the entire neighborhood.

Yours faithfully

[REDACTED]

22 January 2026

From: [REDACTED]
To: [Terriplan](#)
Subject: MPA-07 OBJECTION BL16.SECTION25 BRADDON
Date: Thursday, 22 January 2026 12:36:09 PM
Attachments: [image001.jpg](#)
[MPA-07-OBJECTION BLOCK 16 SECTION 25 BRADDON REZONING.pdf](#)

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Good afternoon

Please find attached the comments on the proposed rezoning of the Braddon Bowls Club

Regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

Objection to Proposed Major Plan Amendment

Block 16 Section 25 Braddon (Former Braddon Bowls Club)

Rezoning from CZ6 to RZ4 – Medium Density Residential

We object to the proposed Territory Plan amendment to rezone this site from CZ6 to RZ4. We are located opposite the subject site and will be directly impacted by the proposal. This submission is based on **Scale, bulk and form, overshadowing and loss of privacy. Traffic impacts and unsuitability to the area is also addressed within.** The proposal is inconsistent with the Density targets for the existing established area and will be detrimental to residential amenity. The proposed rezoning of this block will have immediate impact on traffic and congestion for the Occupants of the street but also the childcare centre and school nearby.

This block is surrounded by RZ1 blocks, mainly single dwelling with some small-scale multi-unit developments all of which do not exceed two storeys in height. Within the street is a childcare centre, aged care housing and a local church. This subject site is included within the Inner North Precinct code and despite its size and proximity to the Civic centre has not been identified as an area for change within its study, nor was the section that it is within highlighted as an area for growth. The area to the North of Henty St stays the focus for increased density, with building heights and bulk designed to layer down from the Northbourne avenue corridor, decreasing in height to the RZ1 zone levels throughout the suburb until it reaches the Wakefield Avenue Precinct. The area of Farrer St and Elder remained RZ1 low density zones. The street is lined with near 100-year-old street trees that are highly valued by all the Occupants of the street, and everything should be done to ensure these are maintained and that any development on the site sit within the existing landscape.

The **building heights** proposed in the proposal, set to increase with the incoming Missing Middle Housing reforms, suggesting up to 21m in height or 6 storeys, are completely **inconsistent with the existing long established residential area** and will be too dominant. This building height is not suitable to a street to transition into a development area. Prior to the missing middle this area had not even transitioned to RZ2 – to propose an RZ4 is unacceptable.

The proposal will have immediate and **detrimental impacts on safety and traffic movements**. Farrer St is often lined with cars during peak times, during school and childcare pick up and drop off times. During workdays it is often used by those working in Braddon for cost effective parking solutions. When Church services are on, often the street parking is full. On weekends we often have people parking in the street that frequent the markets and the Braddon shopping and café precinct. The proposed number of new dwellings in the street will have immediate **impacts on parking** in street that is essential to remain available for those facilities. The MMHR (missing middle housing reforms) do have reduced parking requirements for developments which we understand is to promote walking to work etc but even so and extra 38 dwellings, even if half of those units need an extra carpark on the street we will find the street often

congested and limited options available for our community collecting children from school and childcare.

The graphic modelling included in Purdon's report suggests the existing driveway is the access point to the site. Despite this parcel being subdivided from the section so the site fronting Elder St it suggests Farrer Lane being established. We are **strongly opposed** to this "lane" being included within any proposal. We would like a traffic study completed prior to any rezoning as this indicative new road system would have impacts on all surrounding sites- it is my understanding that this is a rezoning application not a subdivisional one with new roads being proposed. It is usual process for planning to conduct a traffic study in assessing rezoning and this should be provided to the residents of Farrer St. The location of this supposed access lane directly links into the proposed hotel on the Elder St side proposal and no doubt this will further impact on traffic numbers, advantageous for the Elder St proposal to allow traffic through but certainly an immediate change to how school traffic etc will travel through the suburb and will change pedestrian pathways and connections impacting safety when the lane aligns with vehicles exiting driveways opposite and pathways intersect.

No 22 Farrer St, the single dwelling to the East of the site, has significant impacts from the vehicular access suggested- significant increases in noise from vehicular movements and potential bin collections etc. A **Traffic study** should investigate an alternative entry point- there is one other "diseased/near dead" street tree further down the site that may be more suitable. Of course, not so advantageous for the developer of the land on Elder St behind the subject block, but this site should be assessed on its own abilities to resolve access and egress and not reliant on a neighbouring development for resolution. My experience within Planning is that each block is required to provide its own access egress and servicing.

The significant **increase in traffic flow** to this extent would be detrimental to pedestrian safety for those frequenting the childcare centre. Many locals walk children to the childcare changes to volumes and traffic circulation may require improved pedestrian links/ pedestrian crossing to ensure their safety. Existing pathways that link Haig Park through to the school and tennis courts have large numbers of pedestrians travelling at all times of the day and the increased traffic congestion needs to have a full study prior to any rezoning being proposed.

Stormwater management is also of concern with the existing open grates in the kerb opposite frequently overflowing in heavy downpours- the relocation necessary and adjustment to stormwater needs to be considered at DA but important to highlight the system is already under pressure with only 300mm pipes at present being unsuitable to carry existing loads let alone the forecast increased loads.

The Impacts on **residential amenity** are significant with the proposed rezoning of RZ4. The proposed 6-storey building does not align with Inner North Precinct planning policy. Upgrading from RZ1 to RZ4 would more than double the allowed height and greatly increase dwelling numbers. The updated setbacks in the MMHR result in a built form that creates greater visual impact and increases the potential for **overlooking and overshadowing** nearby properties. According to graphic models, the eastern neighbour

may face approximately 16 balconies overlooking their property, which represents a significant and **unacceptable loss of privacy**. Whilst these models are indicative of the envelope the Planning building envelopes and setbacks attached to this assessment need to be considerate of this.

The pedestrian laneways in the local area are consistently tree lined paved spaces that allow community to connect between green urban spaces and the city and the proposed development needs to ensure that this is maintained, the potential for a 3m setback to the public space of a 6 storey built form adjacent will completely change how these spaces present and **destroy the amenity** of the tennis courts and a significant loss of light, winter warmth, and privacy to the childcare centre adjacent.

The relocation of the access point further towards Fawkner Street may also help to resolve the impacts of **overshadowing** to the adjacent childcare centre. The addition of a driveway at this corner of the block will create opportunities for open landscaped spaces that enhance the entry to the laneway and increase visibility for both pedestrian and vehicular traffic. Furthermore, the absence of opposing driveways eliminates potential conflicts.

The **loss of amenity** to north neighbouring properties is significant and should be considered in the assessment. A building with a height of 21 meters, set back 6 meters from Farrer Street and 3 meters from the laneway, will overshadow the childcare centre for most of the winter day—the yard spaces may not even defrost! Reduced outdoor play opportunities due to persistent **overshadowing** may lead parents to seek alternative childcare options, as seen in similar cases where enrolments declined following loss of outdoor amenity. Increased setbacks to the western boundary and controls on overlooking need to be considered and entered into controls for the site.

The tennis courts behind the childcare, which have been rejuvenated and are frequently used by the school and the public, will also have **winter shadow cast** onto the courts which will result in a couple of the courts being rendered unusable as they will remain damp for a considerable amount of the year. This scale of building – up to 6 storeys/21m along the footpath has significant impacts on **overlooking** to the childcare and the safety and wellbeing of those within the centres.

The **Proposed Zoning is inappropriate** to the street. The Missing Middle Housing reforms that have prompted changes to bulk scale building heights and densities state that **RZ3** should be considered a **transitional zone**, with a lower building heights and suggested forms. This area has not progressed through to an RZ2 zone within the Precinct code. It was not identified as an area for change either, despite earlier submission for the Elder St side of the block. The development proposed on the Elder St parcel of land is still under consideration- not approved and does not set a precedence for this application nor should either application be relying on the other for access and egress.

The current maximum building height of the RZ1 zone is 8.5 and set to increase to 10.5/3 storeys with the introduction of the Draft amendments of the Missing Middle

policy. This is an area in transition and the scale and form of the RZ2, at most RZ3, is more appropriate. Within this Inner North Precinct Code, it suggests that;

“ the main focus of the policy should result in the introduction of townhouses duplexes, and triplexes and small-scale apartments.”

This is the form of development that should be proposed here- ideally not the apartment style. This block should be providing an exemplary development that demonstrates how alternative styles of housing are possible and profitable, incentivising by reductions in LVC would assist with this and ACT govt need to consider this to encourage not only developers but individual homeowners and their neighbours to rebuild to provide age in place and multi-generational style living options. The transitional zone should allow limits of somewhere between **10-14m** as this would provide a **more considered and appropriate scale** for the area, it is sympathetic to existing street tree heights and could sit within the landscape.

Modelled graphics in the Purdon proposal, now outdated since the latest Draft amendment 04 being released, demonstrate block forms overlooking side boundaries that completely disregards the amenity of neighbouring blocks. This is a vacant block with limited site restrictions and there is sufficient land available for more creative and respectful design. The development of this block should showcase a Missing middle design that demonstrates how new development can integrate into existing areas, be respectful of neighbouring properties and existing established streetscapes. Rezoning of parcels of land to allow maximum density bulk and form does not always result in good design but rather developments that seek maximum yield with little consideration for community or target markets. The townhouse/terrace style developments along Gould St Turner demonstrate how redevelopments amongst RZ1 can be done successfully, with profit and increased property values and improved amenity that are consistent in scale and maintain streetscape.

Canberra is quickly becoming known for favouring the block form style of apartment blocks which is a direct result of needing to create sufficient yield to cope with the load of large lease variation charges etc for those wishing to develop. Consideration needs to be made to these charges to incentivise smaller scale developments that target the market that the missing Middle policy identified- those who wish to live in area in a smaller scale dwelling with independent titles and limited body corporates.

The cumulative effect and density and scale of the impact of both this site and the Elder St Parcel will **fundamentally diminish the residential amenity** of the area. Whilst I recognise the need for housing within the ACT it should not be at the detriment of the residential amenity and streetscape. Chris Steele mentions as Priority 8 in his Planning Priorities paper;

“Protect the environment and enhance the City’s streetscape”. The density and scale proposed is not consistent with this.

The density proposed for this site exceeds the targets outlined in Assessment Outcome 5 of the RZ1 Zones specification. If we consider the density of the Elder St proposal in

conjunction with this it demonstrates that both proposals far exceed the targets set out for established RZ1 areas. When assessing the suitability of the zoning change and how it should transition for development these density targets are crucial.

(The total original site area was 8732m²- it is not detailed what the subdivided lot of 20 Farrer is but roughly half.....)

8732/10,000 multiplied by 54= 47.15 dwelling- attached houses

8732/10,000 multiplied by 67=58.5 dwellings- apartments

20 Farrer St has 38 dwellings being proposed on it and the Elder St site and the Elder St Proposal has a hotel with 59 units with an additional 43 dwellings shops indoor recreations facilities, hotel and wellness facilities – this is an **inappropriate scale** for the suburb.

Whilst we recognise that this site is well located for redevelopment, and we are not opposed to that, it must be a more suitable scale and form for the area, controlled in height, provide generous setbacks and landscaped perimeters to maintain streetscape and residential amenity. A change to RZ4 will result in a **loss of landscape areas** within one of Canberra's oldest suburbs. This street has generous front setbacks, separation between dwellings, large established trees and access to green spaces with limited traffic flow. Any proposed rezoning should target the market of the Missing Middle- smaller scale triplexes duplexes and townhouses- whatever reduction in yield will be evident in resale of smaller separate dwellings with generous landscaped spaces amongst them -consistent with our Garden City principles.

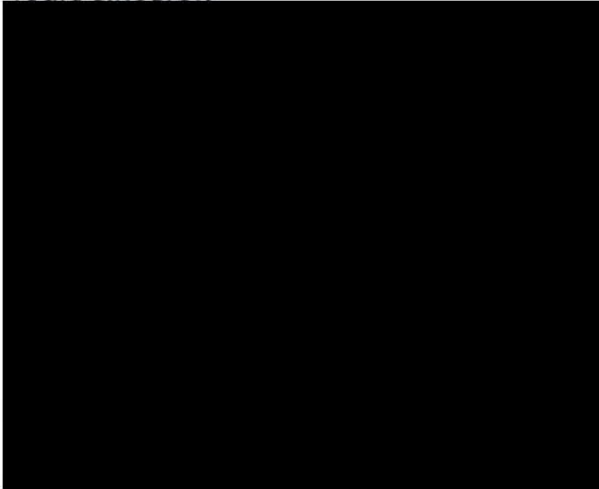
Furthermore, modifications to Lease Variations charges should assist in ensuring these smaller scale developments remain financially viable in this town and must provide a solution that is an alternative to apartment living. Recent sale prices of many of the smaller unit developments that exist in the street have achieved prices more than 2.3million which demonstrates there is sufficient return in building smaller scale with reduced overall build costs with good financial returns.

The proposal was lodged while the Draft Amendment to the Missing Middle Housing Reform legislation is still under review. This timing has disadvantaged many street occupants, making it difficult for them to respond effectively. For many there has been confusion with how things are presented in the Purdon report as 4 storeys as opposed to the draft revisions to the building heights and setbacks etc proposed in the Draft Missing Middle reforms papers. I am fortunate that my occupation provides me with this knowledge and ask that for future correspondence to the surrounding neighbourhood, that ACTPLA keep neighbours up to date with how this policy is progressing and its impacts on the proposal. The failure to do this has resulted in a misleading and unproductive consultation process.

The developer is no doubt aware of this incoming increase in heights and forms, as I am sure Purdon are, and the need to respond to this proposal during such change has disadvantaged many in the community. **The proposed increased heights in the Draft**

Major Plan Amendment 04 for the RZ4 zone, if endorsed by government, is not suitable for this area surrounded by RZ1 development and we ask for it to be refused.

Yours sincerely



From: [REDACTED]
To: [Terriplan](#)
Cc: [REDACTED]
Subject: Objection - Draft Plan Amendment 07, Braddon Bowls Club site (DPA-07)
Date: Thursday, 22 January 2026 3:00:04 PM

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To whom it may concern

We would like to express our objection to the Draft Plan Amendment 07 (DPA-07) regarding the rezoning of the former Braddon Bowls club site (Farrer Street) from CZ6 to RZ4. Our concerns regarding this application are as follows:

- The current zoning of this block is CZ6 which, according to the planning legislation, should "Provide for the development of entertainment, accommodation and leisure facilities for residents of and visitors to the ACT and surrounding region". The stated purpose of this zoning type is to "Protect leisure and accommodation uses from competition from higher order commercial uses, and encourage activities that enhance the region's economic diversity and employment prospects". The current application for rezoning clearly falls into the "higher order commercial use" category that this zoning level was designed to protect against. If the precedent to allow re-zoning of CZ6 to RZ4 begins, there will be *an irreversible reduction in community or leisure sites remaining in Canberra. This is important as medium to high density developments along the Northbourne Avenue corridor brings additional people to the suburb resulting in greater need of leisure, entertainment and community facilities.*
- *Once this site loses its current CZ6 zoning, this designated community space will be lost forever. As the Missing Middle reforms continue to be implemented, these community spaces designated by CZ6 zones sites will become increasingly critical for the future of Canberra and its residents.*

Future rezoning approach

- *If re-zoning is the only option envisaged by planning authorities, we urge that this be limited to RZ1 or RZ2 to protect and respect the local character, streetscape quality and neighbourhood amenity. The surrounding properties along Farrer St, Elder St, and Girrahween St are predominantly zoned RZ1 and along with the school, churches, Childcare centre, Aged care/Palliative Centre and tennis court, the neighbourhood is a thriving and quiet community. The rezoning to RZ4 of the Farrer Street site, would dramatically and permanently alter the character and amenity of this unique neighbourhood.*
- *If this block is rezoned to RZ4, and the number of residences increases to 38 as is suggested in the draft plan, this will result in an unacceptable loss of amenity with regard to noise, traffic and privacy. RZ4 zoning allows for buildings of four stories which significantly interferes with the privacy of Farrer Street residents whose properties adjoin the site. Buildings of this*

scale are out of character with the surrounding streetscape, community amenity and residential nature of the neighbourhood.


- *There are already other townhouse developments in Farrer Street. Any rezoning to allow additional developments of townhouses should be consistent with the size and scale that is already present in the street so as to maintain the neighbourhood character and the existing amenity with regard to traffic, noise, parking and safety.*

We strongly urge the reconsideration of the rezoning of this site to RZ4. Our preference is to maintain the current CZ6 zoning so as to maintain the community, entertainment and leisure nature of the existing usage. If it is decided to sacrifice this community and leisure site to higher order commercial ambitions, rezoning should be restricted to either RZ1 or RZ2 in order to maintain the residential character, amenity and accessibility of the existing neighbourhood.

Sincerely,







ACT Territory Planning Authority
City and Environment Directorate

DRAFT PLAN AMENDMENT 07 – FORMER BRADDON BOWLS CLUB

Written comments on the above Draft Plan Amendment have been invited. My wife and I received notice of the proposed amendment. I offer these comments with her authority.



The area directly affected by the proposed amendment is basically in a RZ1 Zone. All of the dwellings opposite the Primary School along Elder Street are of one or two stories, as is the connecting part of Fawkner Street between Elder and Farrer Streets and both sides of Farrer Street.

There has been considerable development in the Inner North and City Area. Examples in the immediate vicinity of the former Braddon Bowls Club include the Light Rail Corridor which has resulted in the demolition of old government flats and a number of typically RZ 5 dwellings being built notably along Northbourne Avenue from Antill Street to Wakefield Avenue. Similarly the Braddon Place Plan has resulted in the erection of three storey or greater buildings, including domestic residences, along Mort and Lonsdale Streets. The government flats along Bunda Street have been demolished and high rise blocks of units have replaced them. In Dickson, redevelopment has occurred from Morphett Street to Majura Avenue and along Majura Avenue to Wakefield Avenue. All of this has been for two storey units.


Reference has been made to the need for increased availability of housing in its various forms by 2050. In this context it is noted that developments of up to three storeys are not seen as the only means of addressing this issue. Indeed the Territory Plan provides for two other Zones which allow for more intensive development than the traditional single dwelling. Development to date has been predominantly for two storey unit blocks. This includes the Dickson redevelopment mentioned above and redevelopment along Ijong Street. Three storey development is unusual. In Braddon this is limited to the area bounded by Lonsdale, Eloura, Girrawheen and Fawkner Streets.

There are other examples of how housing availability can be enhanced. 29 Elder Street contains seven single storey dwellings. The development along Chisholm Street in Ainslie between Patterson and Campbell Streets is made up of free standing double storey dwellings. It is also questionable whether the building of three storey dwellings on the small land area identified in the amendment application would contribute in any significant way to the availability of housing stock

Development in the North City Area so far has been planned and systematic and this application is inconsistent with planning to date. There is no demonstrable need or benefit in putting a small RZ4 Zone I what is predominantly a RZ1 and I submit that the application should not be approved.



22 January 2026



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23 Jan 2026 7:41:27 AM

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Title

Given name*

Family name*

Organisation name

Enter at least one phone number: *

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Email address*

Application details

Amendment number*

Provide the details of your representation*

It is very disappointing that we are presented with yet another proposal for the extinguishment of land for community facilities, accelerating the development of many social problems.

I would write a longer submission opposing this spot rezoning, but it is clear from the material presented that a decision on this matter has already been made.

You may upload any additional supporting documentation or photos.

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Given name*

Family name*

Organisation name

Enter at least one phone number: *

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Mobile

Email address*

Application details

Amendment number*

Provide the details of your representation*

Dear Assessment Team,

Please find attached a collective neighbourhood submission from residents of Farrer Street and surrounding streets in Braddon in relation to the proposed Major Territory Plan Amendment for Block 16 Section 25 Braddon (former Braddon Bowls Club).

The submission outlines community concerns regarding neighbourhood character, traffic and parking, child safety, residential amenity, environmental and cumulative impacts, and the effects on nearby community and sensitive land uses. It has been prepared with reference to the Planning Act 2023 (ACT) and seeks careful consideration of the matters raised at the plan amendment stage.

Attached is the objection submission and signatures from local residence.

Thank you for your time and consideration of this submission.

Kind regards,

[Redacted signature]

On behalf of residents of Farrer Street and surrounding streets, Braddon

You may upload any additional supporting documentation or photos.

- Maximum file size is 10Mb.
- A maximum of 5 files can be uploaded.

Collective Neighbourhood Submission (1).pdf
Farrer St Signatures.pdf

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Collective Neighbourhood Submission

Objection to Proposed Major Plan Amendment

Block 16 Section 25 Braddon (Former Braddon Bowls Club)
Rezoning from CZ6 – Leisure and Accommodation to RZ4 – Medium Density Residential

To:

ACT Planning and Land Authority
Environment, Planning and Sustainable Development Directorate (EPSDD)

Re:

Major Territory Plan Amendment – Block 16 Section 25 Braddon
Proponent: Syzygy Developments
Supporting Report: Purdon Planning (January 2025)

Date: 18 January 2026

Introduction

We, the undersigned residents of Farrer Street and surrounding streets in Braddon, make this collective submission in **objection** to the proposed Major Territory Plan Amendment seeking to rezone part of Block 16 Section 25 Braddon (former Braddon Bowls Club) from CZ6 – Leisure and Accommodation to RZ4 – Medium Density Residential.

We represent households that are directly affected by this proposal due to proximity, shared street infrastructure, traffic movements, parking demand, and cumulative impacts on residential amenity and safety. This submission is made on planning, environmental, traffic, safety and amenity grounds and reflects consistent and shared concerns across the local neighbourhood.

Neighbourhood Context and Character

The streets surrounding the subject site are characterised by:

- detached, single-dwelling residential homes
- low building heights (predominantly one to two storeys)
- a quiet, low-traffic residential environment
- limited on-street parking capacity; and
- the presence of sensitive land uses, including a childcare centre and nearby schools.

This established character forms the basis on which residents purchased and continue to occupy their homes. The proposed rezoning to RZ4 would introduce a scale, density and intensity of development fundamentally inconsistent with this context.

Traffic, Congestion and Parking Impacts

The local street network already experiences significant traffic and parking pressure, particularly during:

- childcare drop-off and pick-up periods
- school peak hours; and
- evenings and weekends when on-street parking demand is highest.

Key concerns include:

- the introduction of up to 38 additional dwellings, resulting in a substantial increase in daily vehicle movements
- additional visitor, service, waste collection and delivery traffic
- increased noise and congestion
- intensified competition for already limited on-street parking; and
- reduced safety for pedestrians, cyclists and children.

No detailed or cumulative traffic and parking assessment has been provided at the rezoning stage, despite these impacts being direct and foreseeable consequences of the zoning change itself. Deferring this assessment to a later development application stage is inappropriate given the scale and nature of the proposed intensification.

Child Safety and Sensitive Land Uses

The subject site directly adjoins a childcare centre, where safe traffic conditions are critical.

Increased residential density would:

- intensify vehicle movements during peak childcare hours
- increase the risk of vehicle-pedestrian conflict; and
- further constrain already limited parking availability for staff and families.

The proposal does not adequately address these risks, which are intrinsic to the rezoning and must be considered at the plan amendment stage.

Residential Amenity Impacts

The proposed rezoning would result in:

- increased noise from vehicles, residents, visitors and servicing
- loss of privacy through overlooking
- overshadowing inconsistent with surrounding low-rise development; and
- a permanent change to the quiet residential nature of the street.

These impacts represent a clear and lasting reduction in residential amenity and are recognised as legitimate planning considerations.

Impacts on Adjacent Community Facilities

6.1 Local Aged Care Facility (*Planning Act 2023 (ACT) — ss 6, 7, 8, 9*)

The proposed development would have a direct and disproportionate impact on the nearby aged care facility and its residents, who represent a particularly vulnerable cohort within the community.

Residents rely on a calm, predictable and low-traffic environment for their safety, wellbeing and quality of life. Increased traffic, construction activity, noise and reduced on-street parking would materially disrupt this environment. Many residents have limited mobility or rely on assisted transport, requiring safe and uncongested access for carers, medical practitioners, emergency services and visitors.

The Planning Act 2023 emphasises protection of health, safety and wellbeing (s 6), inclusive and equitable communities (s 7), recognition of vulnerable people (s 8), and liveable, human-centred environments (s 9). The proposed intensification does not demonstrate consistency with these principles in respect of the adjacent aged care facility.

6.2 Local Church and Community Access (*Planning Act 2023 (ACT) — ss 6, 7, 9, 10*)

The local church is an important community facility providing religious services, pastoral care and social connection. Its continued function depends on reasonable access, short-term parking availability and a safe pedestrian environment, particularly for elderly and mobility-impaired parishioners.

The proposed development would exacerbate parking and congestion pressures, particularly during weekends, evenings and community events, materially reducing the ability of community members to attend services safely and conveniently.

This outcome is inconsistent with the Act's emphasis on supporting social infrastructure and community cohesion (s 7), accessible environments (s 9), and consideration of cumulative impacts on surrounding land uses (s 10).

6.3 Tennis Club, Open Space and Community Wellbeing (*Planning Act 2023 (ACT) — ss 6, 7, 8, 9, 10*)

The nearby tennis club is a valued recreational and social asset supporting daily physical activity, mental health and community connection.

Increased building bulk and height would cast shadowing over the tennis courts, reducing sunlight access for significant portions of the day. Reduced solar access would negatively affect usability, safety and amenity, particularly during cooler months when sunlight is essential for outdoor recreation. The Planning Act promotes healthy, active communities (s 6), access to open space and recreational facilities (s 7), and environments that support wellbeing (s 9), while requiring assessment of cumulative impacts (s 10). Outcomes that compromise existing recreational infrastructure are inconsistent with these objectives.

Environmental and Cumulative Impacts

(Planning Act 2023 (ACT) — ss 6, 9, 10)

The proposed Major Plan Amendment does not adequately assess the full range of environmental and cumulative impacts that would reasonably arise from rezoning the subject land to permit medium-density residential development.

Cumulative Development Impacts

The proposal must be assessed in the context of **the proposed development on the southern portion of Block 16 Section 25**, together with ongoing intensification within Braddon. When considered cumulatively, the rezoning would enable a level of built form, construction activity, and environmental impact significantly greater than what has historically existed in the surrounding residential streets.

Cumulative impacts include:

- prolonged and overlapping construction activity across the site
- compounding traffic, parking, noise and air-quality impacts
- increased pressure on local stormwater infrastructure and drainage capacity
- incremental loss of tree canopy and permeable surfaces; and
- progressive erosion of residential amenity that cannot be mitigated through individual development applications.

Section 10 of the Planning Act 2023 requires cumulative and incremental impacts to be considered at the strategic planning stage. These impacts have not been adequately assessed in the proposal.

Construction-Phase Environmental Impacts

(Dust, Air Quality and Respirable Crystalline Silica)

Medium-density residential development would involve extensive demolition, excavation, concrete works, vehicle movements and material handling over an extended construction period. These activities are known to generate **significant quantities of construction dust**, including fine particulate matter.

Of particular concern is the potential release of **respirable crystalline silica (RCS)**, which is recognised by **WorkSafe ACT** as a serious health hazard. Silica dust can be generated during:

- cutting, grinding or drilling of concrete, masonry and brick
- demolition of hardstand areas and structural elements
- excavation and soil disturbance involving silica-containing materials.

WorkSafe ACT guidance confirms that exposure to respirable crystalline silica poses heightened risks to human health, including irreversible lung disease, particularly for vulnerable populations. In this location, such populations include:

- children attending the adjacent childcare centre
- residents of the nearby aged care facility
- neighbouring households, including elderly residents; and
- pedestrians and users of nearby community facilities.

Construction dust more broadly can:

- degrade local air quality
- exacerbate asthma and other respiratory conditions
- accumulate on neighbouring properties, vehicles, outdoor play areas and vegetation; and
- require sustained management to prevent off-site impacts.

These risks are **reasonably foreseeable** given the scale of development enabled by the rezoning. The proposal does not demonstrate how construction-phase environmental and health impacts would be addressed at a strategic level, nor does it acknowledge the proximity of sensitive receptors.

Urban Heat Island and Climate-Related Impacts

Rezoning to RZ4 would facilitate a substantial increase in **hard surfaces**, including building footprints, driveways, internal roads and paved areas. Increased hardstand coverage contributes directly to:

- elevated surface and ambient temperatures
- reduced natural cooling through evapotranspiration
- increased heat retention during warmer months; and
- reduced thermal comfort for residents and pedestrians.

These impacts are particularly relevant in light of the **ACT Climate Change Strategy** and associated urban heat mitigation objectives, which emphasise the importance of:

- protecting and enhancing tree canopy
- maintaining permeable surfaces
- minimising urban heat island effects; and
- designing urban environments that remain liveable under increasing heat conditions.
- The proposal does not adequately demonstrate how increased development intensity would align with these climate resilience objectives.

Tree Canopy, Drainage and Microclimate Effects

The proposal does not sufficiently assess:

- loss or degradation of existing tree canopy
- increased stormwater runoff due to higher site coverage
- pressure on local drainage systems during heavy rainfall events; and
- changes to local microclimate conditions, including wind and solar access.

Increased impervious surfaces reduce natural infiltration and increase runoff volumes, elevating the risk of localised flooding and downstream impacts. These matters are directly relevant at the rezoning stage, as they arise from the development capacity enabled by the amendment rather than from later design decisions.

Statutory Grounds of Objection

Planning Act 2023 (ACT)

8.1 Objects of the Act — Section 6

The proposed rezoning does not adequately demonstrate consistency with the objects of the Act, including orderly and sustainable development, protection of health and safety, appropriateness to context, and planning certainty.

8.2 Orderly and Proper Planning — Sections 7 and 8

The proposal represents piecemeal planning, rezoning a single site without a precinct-wide structure plan, integrated traffic strategy, or infrastructure framework, contrary to orderly and proper planning principles.

8.3 Community Amenity, Safety and Wellbeing — Section 9

The rezoning would result in increased congestion, noise, loss of privacy and safety risks, degrading residential amenity and undermining reasonable community expectations.

8.4 Cumulative and Incremental Impacts — Section 10

Cumulative impacts arising from existing approvals, constrained road capacity, sensitive land uses and parking limitations have not been adequately assessed at the rezoning stage.

8.5 Territory Plan Amendments — Sections 56–59

Deferring critical matters such as traffic, parking, safety and amenity impacts to later development applications is procedurally inappropriate where those impacts arise directly from the zoning change itself.

8.6 Housing Supply and Balance — Section 6(f)

While the Act supports housing supply, it requires a balanced approach that directs growth to appropriate locations without imposing disproportionate impacts on established communities.

8.7 Precedent, Equity and Planning Certainty — Sections 6(d) and 11

Approval would set an undesirable precedent for further up-zoning of surrounding low-density streets, undermining equity, certainty and confidence in the planning system.

Inappropriateness of Deferral to Later Stages

Environmental impacts of this nature are **intrinsic to the zoning change itself**, not merely matters of construction management or architectural detail. Deferring their assessment to later development application stages is inappropriate where:

- the rezoning enables materially different development outcomes; and
- impacts are foreseeable at the plan amendment stage.

Consistent with the Planning Act 2023 (ACT), rezoning decisions must consider **worst-case development outcomes**, rather than rely on aspirational future design responses or conditions imposed at later stages.

Conclusion

Having regard to the **Planning Act 2023 (ACT)**, we submit that the proposed Major Plan Amendment:

- fails to meet the objects of the Act (s 6)
- does not promote orderly and proper planning (ss 7–8)
- inadequately protects community amenity and safety (s 9)
- fails to assess cumulative impacts (s 10)
- relies on inappropriate deferral of critical matters (ss 56–59)
- undermines planning certainty and equity (ss 6(d), 11)

Requested Outcome

Having regard to the objects and principles of the **Planning Act 2023 (ACT)**, we collectively submit that the proposed Major Plan Amendment to rezone part of Block 16 Section 25 Braddon from CZ6 – Leisure and Accommodation to RZ4 – Medium Density Residential **should not proceed**.

The proposal, as currently framed, would enable development outcomes that are incompatible with the established residential character of the area, would give rise to unacceptable impacts on safety, amenity, environmental conditions and community wellbeing, and does not adequately address cumulative impacts at the strategic planning stage.

Without conceding support for rezoning, and only in the event that the Territory determines further consideration is warranted, we submit that any future proposal would require:

- withdrawal of the current amendment and the preparation of a **fundamentally revised planning approach**,
- early and meaningful **community consultation** prior to any new amendment being progressed, and

- comprehensive, independent and publicly available assessments of traffic, parking, safety, environmental, climate and cumulative impacts **before** any change to zoning or development controls is contemplated.

Any future consideration must begin from the existing low-intensity residential context and demonstrate, through evidence rather than assumption, that development outcomes can be accommodated without unacceptable impacts on the neighbourhood or vulnerable community members.

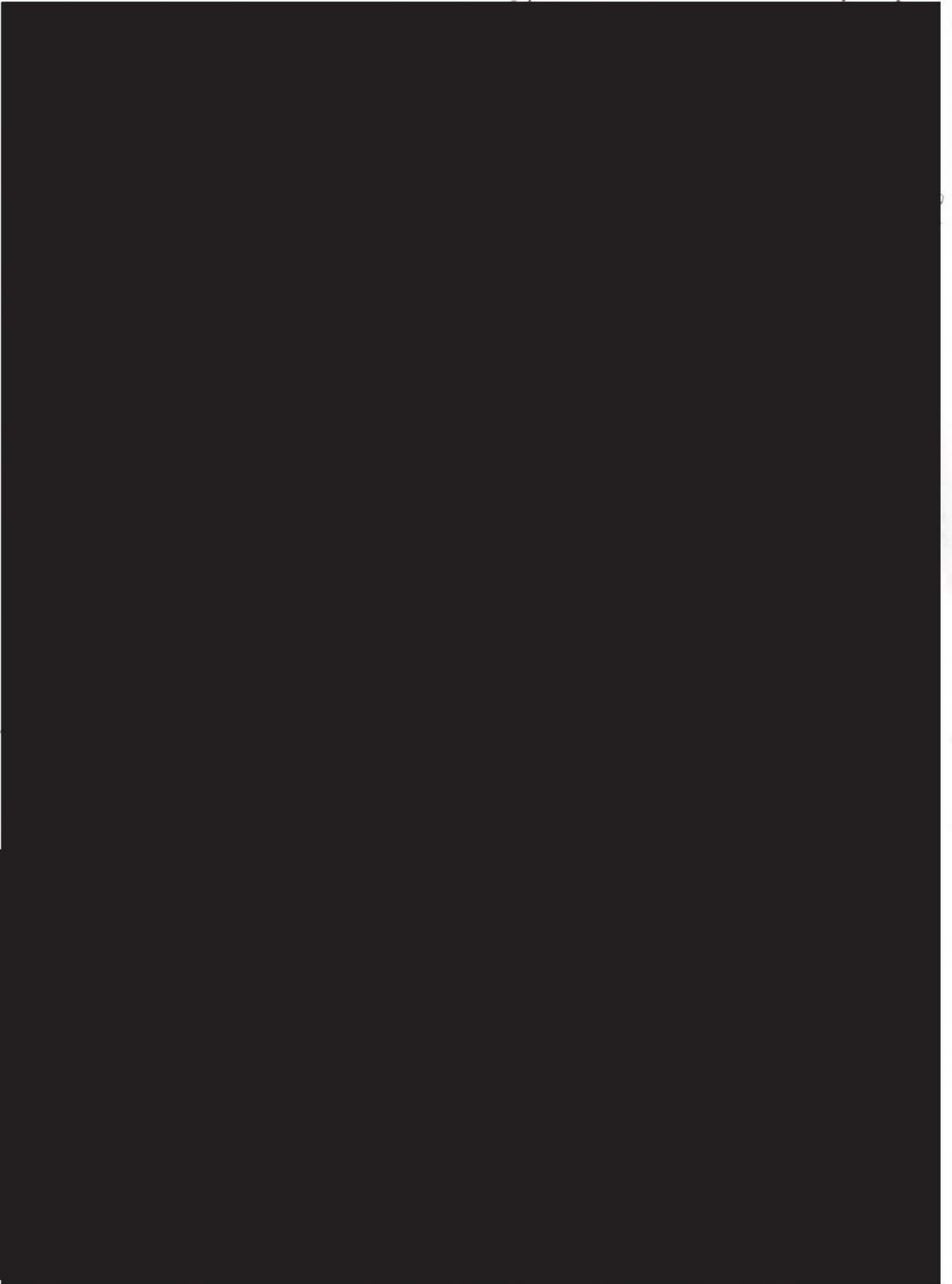
We thank the ACT Planning and Land Authority for its time and consideration and trust that this submission will assist in the fair, transparent and rigorous assessment of the proposed amendment.

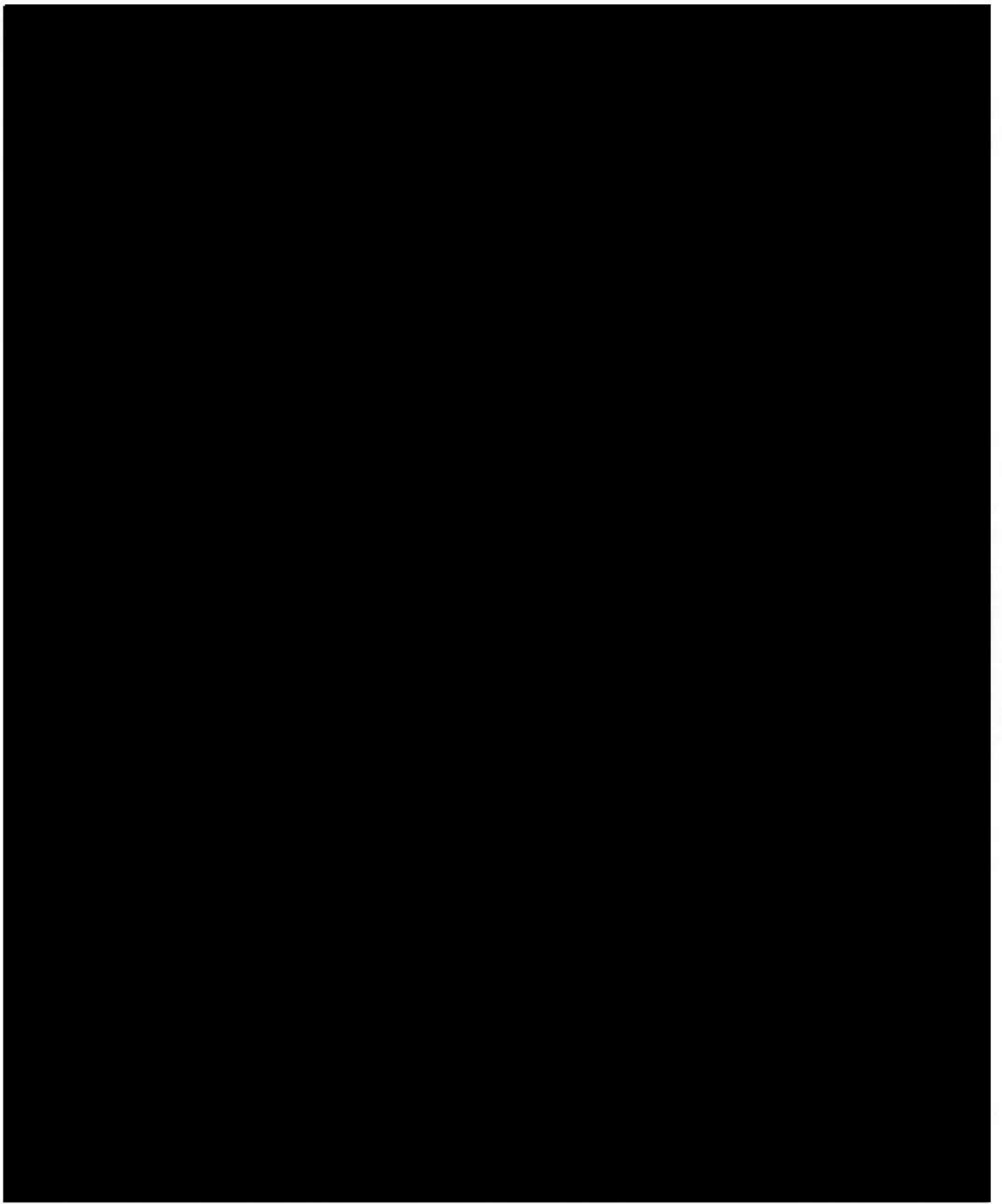
Signatories

Name

Address

Signature





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Family name*

Organisation name

Enter at least one phone number: *

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Application details

Amendment number*

Provide the details of your representation*

Former Braddon Bowls Club
I am writing to oppose the current Draft Plan amendment 07-Former Braddon Bowls Club to rezone part of Block 16 Section 25 Braddon from CZ6 to RZ4. The proposed development is incompatible with the surrounding residential and community environment. The proposed excavations and construction would be lengthy, noisy, disruptive and dangerous to adjacent public activities, especially the Ainslie Primary School and the nearby Childcare Centre. It is unnecessary and will not result in any increase in housing supply. The site is a blatant example of land-banking. The Lease should therefore be terminated and the property retained for community facilities, particularly in view of the prolific growth of other medium/high-density developments in Braddon and Turner, increasing residents' requirements for access to recreational/social activities.

You may upload any additional supporting documentation or photos.

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-

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From: [REDACTED]
To: [Terrplan](#)
Cc: [REDACTED]
Subject: Major Territory Plan Amendment – Block 16 Section 25 Braddon
Date: Friday, 23 January 2026 2:18:26 PM

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To whom it may concern,

I write to formally object to Draft Plan Amendment 07 (DPA-07) proposing the rezoning of part of Block 16 Section 25 Braddon (former Braddon Bowls Club) from CZ6 – Leisure and Accommodation to RZ4 – Medium Density Residential.

I am a resident of Farrer Street and am directly affected by this proposal. I also support and align my objection with the collective neighbourhood submission made by residents of Farrer Street and surrounding streets, which raises consistent and shared concerns regarding planning, traffic, safety, environmental impacts and loss of residential amenity.

At the outset, I strongly object to the apparent preferential treatment being afforded to a private developer. As a resident of an RZ1 block on Farrer Street, I am not afforded the opportunity to seek rezoning to RZ4 in order to maximise development yield. This proposal raises serious concerns regarding equity, precedent and planning certainty.

It is clear that the rezoning is being sought solely to enable development outcomes not permissible under the existing CZ6 zoning. This land was designated to provide for leisure, accommodation and community-serving uses, not high-density residential development. Allowing rezoning for profit-driven outcomes directly undermines the intent of the Territory Plan.

The surrounding streets — Farrer Street, Elder Street and Girrahween Street — are characterised by detached dwellings, low building heights, limited on-street parking and a quiet residential environment. Introducing RZ4 zoning would permit a scale and intensity of development fundamentally inconsistent with this established neighbourhood character.

The proposal would significantly worsen existing traffic, congestion and parking pressures. The local street network already experiences strain during childcare drop-off and pick-up times, school peak periods, and evenings and weekends. Rezoning would enable up to 38 additional dwellings, resulting in increased vehicle movements, servicing traffic, noise and competition for already limited on-street parking. No detailed or cumulative traffic and parking assessment has been provided at the rezoning stage, despite these impacts being direct and foreseeable consequences of the zoning change itself.

Of particular concern is the proximity of sensitive land uses, including a childcare centre,

nearby schools, an aged care facility, a local church and a tennis club. Increased traffic volumes, congestion and parking demand would materially reduce safety and accessibility for children, elderly residents and mobility-impaired community members. Increased building height and bulk would also result in overlooking, loss of privacy, overshadowing and permanent degradation of residential amenity.

The Planning Act 2023 (ACT) requires consideration of community wellbeing, safety, vulnerable populations, cumulative impacts and orderly and proper planning. In my view, this proposal fails to meet those statutory objectives and represents piecemeal planning of a single site without a precinct-wide structure plan, integrated traffic strategy or infrastructure framework.

If any rezoning were to be contemplated, it should be to RZ1 to align with the surrounding streetscape, not RZ4. Even RZ2 zoning under the Missing Middle reforms would be inconsistent with the character and amenity of the area. Rezoning to RZ4 would also remove the CZ6 requirement to protect nearby residential amenity with respect to noise, traffic, parking and privacy.

Finally, if the current owners do not intend to develop the site in a manner consistent with its CZ6 designation, it should be sold to an entity that will deliver genuine community, leisure or accommodation uses. There are numerous locations elsewhere in Canberra where higher-density residential development is appropriate without compromising established residential neighbourhoods.

For these reasons, I strongly object to Draft Plan Amendment 07 and urge the Planning Authority to reject the proposal.

Regards,

A solid black rectangular redaction box covering the signature area.

From: [REDACTED]
To: [Terrplan](#)
Cc: [REDACTED]
Subject: Draft Plan Amendment 07 - Former Braddon Bowls Club [SEC=UNOFFICIAL]
Date: Friday, 23 January 2026 3:24:40 PM
Attachments: [REDACTED]

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UNOFFICIAL

Good afternoon,

Please find attached our objection to the proposed DPA-07 to amend the Territory Plan map to rezone part of Block 16 Section 25 Braddon from CZ6 Leisure and Accommodation Zone to RZ4-Medium Density Residential Zone.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

Objection to Proposed Major Plan Amendment

Block 16 Section 25 Braddon (Former Braddon Bowls Club)

Rezoning from CZ6 – Leisure and Accommodation to RZ4 – Medium Density Residential

To:

ACT Planning and Land Authority

Environment, Planning and Sustainable Development Directorate (EPSDD)

Re:

Major Territory Plan Amendment – Block 16 Section 25 Braddon

Proponent: Syzygy Developments

Supporting Report: Purdon Planning (January 2025)

Date: 21 January 2026

Introduction

We, [REDACTED] in Braddon, make this submission in **objection** to the proposed Major Territory Plan Amendment seeking to rezone part of Block 16 Section 25 Braddon (former Braddon Bowls Club) from CZ6 – Leisure and Accommodation to RZ4 – Medium Density Residential.

We, living [REDACTED] the former Braddon Bowls Club, are directly affected by this proposal due to proximity, shared street infrastructure, traffic movements, parking demand, and cumulative impacts on residential amenity and safety.

This submission is made on planning, environmental, traffic, safety and amenity grounds and reflects consistent and shared concerns across the local neighbourhood.

Neighbourhood Context and Character

The streets surrounding the subject site are characterised by:

- detached, single-dwelling residential homes
- low building heights (predominantly one to two storeys)
- a quiet, low-traffic residential environment
- limited on-street parking capacity; and
- the presence of sensitive land uses, including a childcare centre and nearby schools.

This established character forms the basis on which residents purchased and continue to occupy their homes. The proposed rezoning to RZ4 would introduce a scale, density and intensity of development fundamentally inconsistent with this context. **We also understand there's a proposal for the "missing middle" changes which will allow RZ3 development to achieve 4 stories, whilst RZ4 will be able to achieve 21.5m height (6 stories).**

Traffic, Congestion and Parking Impacts

The local street network already experiences significant traffic and parking pressure, particularly during:

- childcare drop-off and pick-up periods
- school peak hours; and
- evenings and weekends when on-street parking demand is highest.

Key concerns include:

- the introduction of up to 38 additional dwellings, resulting in a substantial increase in daily vehicle movements
- additional visitor, service, waste collection and delivery traffic
- increased noise and congestion
- intensified competition for already limited on-street parking; and
- reduced safety for pedestrians, cyclists and children.

No detailed or cumulative traffic and parking assessment has been provided at the rezoning stage, despite these impacts being direct and foreseeable consequences of the zoning change itself. Deferring this assessment to a later development application stage is inappropriate given the scale and nature of the proposed intensification.

Child Safety and Sensitive Land Uses

The subject site directly adjoins a childcare centre, where safe traffic conditions are critical.

Increased residential density would:

- intensify vehicle movements during peak childcare hours
- increase the risk of vehicle-pedestrian conflict; and
- further constrain already limited parking availability for staff and families.

The proposal does not adequately address these risks, which are intrinsic to the rezoning and must be considered at the plan amendment stage.

Residential Amenity Impacts

The proposed rezoning would result in:

- increased noise from vehicles, residents, visitors and servicing
- loss of privacy through overlooking
- overshadowing inconsistent with surrounding low-rise development; and
- a permanent change to the quiet residential nature of the street.

These impacts represent a clear and lasting reduction in residential amenity and are recognised as legitimate planning considerations.

Impacts on Adjacent Community Facilities

6.1 Local Aged Care Facility (*Planning Act 2023 (ACT) — ss 6, 7, 8, 9*)

The proposed development would have a direct and disproportionate impact on the nearby aged care facility and its residents, who represent a particularly vulnerable cohort within the community.

Residents rely on a calm, predictable and low-traffic environment for their safety, wellbeing and quality of life. Increased traffic, construction activity, noise and reduced on-street parking would materially disrupt this environment. Many residents have limited mobility or rely on assisted transport, requiring safe and uncongested access for carers, medical practitioners, emergency services and visitors.

The Planning Act 2023 emphasises protection of health, safety and wellbeing (s 6), inclusive and equitable communities (s 7), recognition of vulnerable people (s 8), and liveable, human-centred environments (s 9). The proposed intensification does not demonstrate consistency with these principles in respect of the adjacent aged care facility.

6.2 Local Church and Community Access (*Planning Act 2023 (ACT) — ss 6, 7, 9, 10*)

The local church is an important community facility providing religious services, pastoral care and social connection. Its continued function depends on reasonable access, short-term parking availability and a safe pedestrian environment, particularly for elderly and mobility-impaired parishioners.

The proposed development would exacerbate parking and congestion pressures, particularly during weekends, evenings and community events, materially reducing the ability of community members to attend services safely and conveniently.

This outcome is inconsistent with the Act's emphasis on supporting social infrastructure and community cohesion (s 7), accessible environments (s 9), and consideration of cumulative impacts on surrounding land uses (s 10).

6.3 Tennis Club, Open Space and Community Wellbeing (*Planning Act 2023 (ACT) — ss 6, 7, 8, 9, 10*)

The nearby tennis club is a valued recreational and social asset supporting daily physical activity, mental health and community connection.

Increased building bulk and height would cast shadowing over the tennis courts, reducing sunlight access for significant portions of the day. Reduced solar access would negatively affect usability, safety and amenity, particularly during cooler months when sunlight is essential for outdoor recreation. The Planning Act promotes healthy, active communities (s 6), access to open space and recreational facilities (s 7), and environments that support wellbeing (s 9), while requiring assessment of cumulative impacts (s 10). Outcomes that compromise existing recreational infrastructure are inconsistent with these objectives.

Environmental and Cumulative Impacts

(Planning Act 2023 (ACT) — ss 6, 9, 10)

The proposed Major Plan Amendment does not adequately assess the full range of environmental and cumulative impacts that would reasonably arise from rezoning the subject land to permit medium-density residential development.

Cumulative Development Impacts

The proposal must be assessed in the context of **the proposed development on the southern portion of Block 16 Section 25**, together with ongoing intensification within Braddon. When considered cumulatively, the rezoning would enable a level of built form, construction activity, and environmental impact significantly greater than what has historically existed in the surrounding residential streets.

Cumulative impacts include:

- prolonged and overlapping construction activity across the site
- compounding traffic, parking, noise and air-quality impacts
- increased pressure on local stormwater infrastructure and drainage capacity
- incremental loss of tree canopy and permeable surfaces; and
- progressive erosion of residential amenity that cannot be mitigated through individual development applications.

Section 10 of the Planning Act 2023 requires cumulative and incremental impacts to be considered at the strategic planning stage. These impacts have not been adequately assessed in the proposal.

Construction-Phase Environmental Impacts

(Dust, Air Quality and Respirable Crystalline Silica)

Medium-density residential development would involve extensive demolition, excavation, concrete works, vehicle movements and material handling over an extended construction period. These activities are known to generate **significant quantities of construction dust**, including fine particulate matter.

Of particular concern is the potential release of **respirable crystalline silica (RCS)**, which is recognised by **WorkSafe ACT** as a serious health hazard. Silica dust can be generated during:

- cutting, grinding or drilling of concrete, masonry and brick
- demolition of hardstand areas and structural elements
- excavation and soil disturbance involving silica-containing materials.

WorkSafe ACT guidance confirms that exposure to respirable crystalline silica poses heightened risks to human health, including irreversible lung disease, particularly for vulnerable populations. In this location, such populations include:

- children attending the adjacent childcare centre
- residents of the nearby aged care facility
- neighbouring households, including elderly residents; and
- pedestrians and users of nearby community facilities.

Construction dust more broadly can:

- degrade local air quality
- exacerbate asthma and other respiratory conditions
- accumulate on neighbouring properties, vehicles, outdoor play areas and vegetation; and
- require sustained management to prevent off-site impacts.

These risks are **reasonably foreseeable** given the scale of development enabled by the rezoning. The proposal does not demonstrate how construction-phase environmental and health impacts would be addressed at a strategic level, nor does it acknowledge the proximity of sensitive receptors.

Urban Heat Island and Climate-Related Impacts

Rezoning to RZ4 would facilitate a substantial increase in **hard surfaces**, including building footprints, driveways, internal roads and paved areas. Increased hardstand coverage contributes directly to:

- elevated surface and ambient temperatures
- reduced natural cooling through evapotranspiration
- increased heat retention during warmer months; and
- reduced thermal comfort for residents and pedestrians.

These impacts are particularly relevant in light of the **ACT Climate Change Strategy** and associated urban heat mitigation objectives, which emphasise the importance of:

- protecting and enhancing tree canopy
- maintaining permeable surfaces
- minimising urban heat island effects; and
- designing urban environments that remain liveable under increasing heat conditions.
- The proposal does not adequately demonstrate how increased development intensity would align with these climate resilience objectives.

Tree Canopy, Drainage and Microclimate Effects

The proposal does not sufficiently assess:

- loss or degradation of existing tree canopy
- increased stormwater runoff due to higher site coverage
- pressure on local drainage systems during heavy rainfall events; and
- changes to local microclimate conditions, including wind and solar access.

Increased impervious surfaces reduce natural infiltration and increase runoff volumes, elevating the risk of localised flooding and downstream impacts. These matters are directly relevant at the rezoning stage, as they arise from the development capacity enabled by the amendment rather than from later design decisions.

Statutory Grounds of Objection

Planning Act 2023 (ACT)

8.1 Objects of the Act — Section 6

The proposed rezoning does not adequately demonstrate consistency with the objects of the Act, including orderly and sustainable development, protection of health and safety, appropriateness to context, and planning certainty.

8.2 Orderly and Proper Planning — Sections 7 and 8

The proposal represents piecemeal planning, rezoning a single site without a precinct-wide structure plan, integrated traffic strategy, or infrastructure framework, contrary to orderly and proper planning principles.

8.3 Community Amenity, Safety and Wellbeing — Section 9

The rezoning would result in increased congestion, noise, loss of privacy and safety risks, degrading residential amenity and undermining reasonable community expectations.

8.4 Cumulative and Incremental Impacts — Section 10

Cumulative impacts arising from existing approvals, constrained road capacity, sensitive land uses and parking limitations have not been adequately assessed at the rezoning stage.

8.5 Territory Plan Amendments — Sections 56–59

Deferring critical matters such as traffic, parking, safety and amenity impacts to later development applications is procedurally inappropriate where those impacts arise directly from the zoning change itself.

8.6 Housing Supply and Balance — Section 6(f)

While the Act supports housing supply, it requires a balanced approach that directs growth to appropriate locations without imposing disproportionate impacts on established communities.

8.7 Precedent, Equity and Planning Certainty — Sections 6(d) and 11

Approval would set an undesirable precedent for further up-zoning of surrounding low-density streets, undermining equity, certainty and confidence in the planning system.

Inappropriateness of Deferral to Later Stages

Environmental impacts of this nature are **intrinsic to the zoning change itself**, not merely matters of construction management or architectural detail. Deferring their assessment to later development application stages is inappropriate where:

- the rezoning enables materially different development outcomes; and
- impacts are foreseeable at the plan amendment stage.

Consistent with the Planning Act 2023 (ACT), rezoning decisions must consider **worst-case development outcomes**, rather than rely on aspirational future design responses or conditions imposed at later stages.

Conclusion

Having regard to the **Planning Act 2023 (ACT)**, we submit that the proposed Major Plan Amendment:

- fails to meet the objects of the Act (s 6)
- does not promote orderly and proper planning (ss 7–8)
- inadequately protects community amenity and safety (s 9)
- fails to assess cumulative impacts (s 10)
- relies on inappropriate deferral of critical matters (ss 56–59)
- undermines planning certainty and equity (ss 6(d), 11)

Requested Outcome

Having regard to the objects and principles of the **Planning Act 2023 (ACT)**, we collectively submit that the proposed Major Plan Amendment to rezone part of Block 16 Section 25 Braddon from CZ6 – Leisure and Accommodation to RZ4 – Medium Density Residential **should not proceed**.

The proposal, as currently framed, would enable development outcomes that are incompatible with the established residential character of the area, would give rise to unacceptable impacts on safety, amenity, environmental conditions and community wellbeing, and does not adequately address cumulative impacts at the strategic planning stage.

Without conceding support for rezoning, and only in the event that the Territory determines further consideration is warranted, we submit that any future proposal would require:

- withdrawal of the current amendment and the preparation of a **fundamentally revised planning approach**,
- early and meaningful **community consultation** prior to any new amendment being progressed, and

- comprehensive, independent and publicly available assessments of traffic, parking, safety, environmental, climate and cumulative impacts **before** any change to zoning or development controls is contemplated.

Any future consideration must begin from the existing low-intensity residential context and demonstrate, through evidence rather than assumption, that development outcomes can be accommodated without unacceptable impacts on the neighbourhood or vulnerable community members.

Regards

[Redacted signature]

[Redacted contact information]

From: [REDACTED]
To: [Terrplan](#)
Subject: Draft Major Plan Amendment to Territory Plan 2023 - Former Braddon Bowls Club
Date: Friday, 23 January 2026 4:06:34 PM
Attachments: [Objection to Proposed Major Plan Amendment Block 16 Section 25 Braddon.docx](#)

You don't often get email from [REDACTED] [Learn why this is important](#)

Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good afternoon,

Please find attached our comments on the subject Draft Amendment.

[REDACTED]
[REDACTED]
[REDACTED]

Submission to Proposed Major Plan Amendment Block 16 Section 25 Braddon (Former Braddon Bowls Club)

Rezoning from CZ6 – Leisure and Accommodation to RZ4 – Medium Density Residential

To: ACT Planning and Land Authority Environment, Planning and Sustainable Development Directorate (EPSDD)

Re: Major Territory Plan Amendment – Block 16 Section 25 Braddon Proponent: Syzygy Developments Supporting Report: Purdon Planning (January 2025)

Date: 18 January 2026

Introduction

We, [REDACTED] object to the proposed Major Territory Plan Amendment seeking to rezone part of Block 16 Section 25 Braddon (former Braddon Bowls Club) from CZ6 – Leisure and Accommodation to RZ4 – Medium Density Residential.

We are directly affected by this proposal due to proximity, shared street infrastructure, traffic movements, parking demand, and cumulative impacts on residential amenity and safety. This submission is made on planning, environmental, traffic, safety and amenity grounds and reflects shared concerns across the local neighbourhood.

Neighbourhood Context and Character

The streets surrounding the subject site are characterised by:

- detached, single-dwelling residential homes
- low building heights (predominantly one to two storeys)
- a quiet, low-traffic residential environment
- limited on-street parking capacity; and
- the presence of sensitive land uses, including churches, a childcare centre and nearby schools.

This established character forms the basis on which residents purchased and continue to occupy their homes. The proposed rezoning to RZ4 would introduce a scale, density and intensity of development inconsistent with this context.

Traffic, Congestion and Parking Impacts

The local street network already experiences significant traffic and parking pressure, particularly during:

- childcare drop-off and pick-up periods

- school peak hours; and
- evenings and weekends when on-street parking demand is highest.

Key concerns include:

- the introduction of up to 38 additional dwellings, resulting in a substantial increase in daily vehicle movements
- additional visitor, service, waste collection and delivery traffic
- increased noise and congestion
- intensified competition for already limited on-street parking; and
- reduced safety for pedestrians, cyclists and children.

No detailed or cumulative traffic and parking assessment has been provided at the rezoning stage, despite these impacts being direct and foreseeable consequences of the zoning change itself. Deferring this assessment to a later development application stage is inappropriate given the scale and nature of the proposed intensification.

Child Safety and Sensitive Land Uses

The subject site directly adjoins a childcare centre, where safe traffic conditions are critical. Increased residential density would:

- intensify vehicle movements during peak childcare hours
- increase the risk of vehicle-pedestrian conflict; and
- further constrain already limited parking availability for staff and families.

The proposal does not adequately address these risks, which are intrinsic to the rezoning and must be considered at the plan amendment stage.

Residential Amenity Impacts

The proposed rezoning would result in:

- increased noise from vehicles, residents, visitors and servicing
- loss of privacy through overlooking
- overshadowing inconsistent with surrounding low-rise development; and
- a permanent change to the quiet residential nature of the street.

These impacts represent a clear and lasting reduction in residential amenity and are recognised as legitimate planning considerations.

Impacts on Adjacent Community Facilities

6.1 Local Aged Care Facility (Planning Act 2023 (ACT) — ss 6, 7, 8, 9)

The proposed development would have a direct and disproportionate impact on the nearby aged care facility and its residents, who represent a particularly vulnerable cohort within the community. Residents rely on a calm, predictable and low-traffic environment for their safety, wellbeing and quality of life. Increased traffic, construction activity, noise and reduced on-street parking would materially disrupt this environment. Many residents have limited mobility or rely on assisted transport, requiring safe and uncongested access for carers, medical practitioners, emergency services and visitors. The Planning Act 2023 emphasises protection of health, safety and wellbeing (s 6), inclusive and equitable communities (s 7), recognition of vulnerable people (s 8), and liveable, human-centred environments (s 9). The proposed intensification does not demonstrate consistency with these principles in respect of the adjacent aged care facility.

6.2 Local Church and Community Access (Planning Act 2023 (ACT) — ss 6, 7, 9, 10) The local church is an important community facility providing religious services, pastoral care and social connection. Its continued function depends on reasonable access, short-term parking availability and a safe pedestrian environment, particularly for elderly and mobility-impaired parishioners. The proposed development would exacerbate parking and congestion pressures, particularly during weekends, evenings and community events, materially reducing the ability of community members to attend services safely and conveniently. This outcome is inconsistent with the Act's emphasis on supporting social infrastructure and community cohesion (s 7), accessible environments (s 9), and consideration of cumulative impacts on surrounding land uses (s 10).

6.3 Tennis Club, Open Space and Community Wellbeing (Planning Act 2023 (ACT) — ss 6, 7, 8, 9, 10)

The nearby tennis club is a valued recreational and social asset supporting daily physical activity, mental health and community connection. Increased building bulk and height would cast shadowing over the tennis courts, reducing sunlight access for significant portions of the day. Reduced solar access would negatively affect usability, safety and amenity, particularly during cooler months when sunlight is essential for outdoor recreation. The Planning Act promotes healthy, active communities (s 6), access to open space and recreational facilities (s 7), and environments that support wellbeing (s 9), while requiring assessment of cumulative impacts (s 10). Outcomes that compromise existing recreational infrastructure are inconsistent with these objectives.

Environmental and Cumulative Impacts (Planning Act 2023 (ACT) — ss 6, 9, 10)

The proposed Major Plan Amendment does not adequately assess the full range of environmental and cumulative impacts that would reasonably arise from rezoning the subject land to permit medium-density residential development.

Cumulative Development Impacts

The proposal must be assessed in the context of the proposed development on the southern portion of Block 16 Section 25, together with ongoing intensification within Braddon. When considered cumulatively, the rezoning would enable a level of built form, construction activity, and environmental impact significantly greater than what has historically existed in the surrounding residential streets. Cumulative impacts include:

- prolonged and overlapping construction activity across the site
- compounding traffic, parking, noise and air-quality impacts
- increased pressure on local stormwater infrastructure and drainage capacity
- incremental loss of tree canopy and permeable surfaces; and
- progressive erosion of residential amenity that cannot be mitigated through individual development applications.

Section 10 of the Planning Act 2023 requires cumulative and incremental impacts to be considered at the strategic planning stage. These impacts have not been adequately assessed in the proposal.

Construction-Phase Environmental Impacts (Dust, Air Quality and Respirable Crystalline Silica)

Medium-density residential development would involve extensive demolition, excavation, concrete works, vehicle movements and material handling over an extended construction period. These activities are known to generate significant quantities of construction dust, including fine particulate matter. Of particular concern is the potential release of respirable crystalline silica (RCS), which is recognised by WorkSafe ACT as a serious health hazard. Silica dust can be generated during:

- cutting, grinding or drilling of concrete, masonry and brick
- demolition of hardstand areas and structural elements
- excavation and soil disturbance involving silica-containing materials.

WorkSafe ACT guidance confirms that exposure to respirable crystalline silica poses heightened risks to human health, including irreversible lung disease, particularly for vulnerable populations.

In this location, such populations include:

- children attending the adjacent childcare centre and primary school
- residents of the nearby aged care facility
- neighbouring households, including elderly residents; and
- pedestrians and users of nearby community facilities.

Construction dust more broadly can:

- degrade local air quality
- exacerbate asthma and other respiratory conditions
- accumulate on neighbouring properties, vehicles, outdoor play areas and vegetation; and
- require sustained management to prevent off-site impacts.

These risks are reasonably foreseeable given the scale of development enabled by the rezoning. The proposal does not demonstrate how construction-phase environmental and health impacts would be addressed at a strategic level, nor does it acknowledge the proximity of sensitive receptors.

Urban Heat Island and Climate-Related Impacts

Rezoning to RZ4 would facilitate a substantial increase in hard surfaces, including building footprints, driveways, internal roads and paved areas.

Increased hardstand coverage contributes directly to:

- elevated surface and ambient temperatures
- reduced natural cooling through evapotranspiration
- increased heat retention during warmer months; and
- reduced thermal comfort for residents and pedestrians.

These impacts are particularly relevant in light of the ACT Climate Change Strategy and associated urban heat mitigation objectives, which emphasise the importance of:

- protecting and enhancing tree canopy
- maintaining permeable surfaces
- minimising urban heat island effects; and
- designing urban environments that remain liveable under increasing heat conditions.

The proposal does not adequately demonstrate how increased development intensity would align with these climate resilience objectives.

Tree Canopy, Drainage and Microclimate Effects

The proposal does not sufficiently assess:

- loss or degradation of existing tree canopy
- increased stormwater runoff due to higher site coverage
- pressure on local drainage systems during heavy rainfall events; or
- changes to local microclimate conditions, including wind and solar access.

Increased impervious surfaces reduce natural infiltration and increase runoff volumes, elevating the risk of localised flooding and downstream impacts. These matters are directly relevant at the rezoning stage, as they arise from the development capacity enabled by the amendment rather than from later design decisions.

Statutory Grounds of Objection Planning Act 2023 (ACT)

8.1 Objects of the Act — Section 6

The proposed rezoning does not adequately demonstrate consistency with the objects of the Act, including orderly and sustainable development, protection of health and safety, appropriateness to context, and planning certainty.

8.2 Orderly and Proper Planning — Sections 7 and 8

The proposal represents piecemeal planning, rezoning a single site without a precinct wide structure plan, integrated traffic strategy, or infrastructure framework, contrary to orderly and proper planning principles.

8.3 Community Amenity, Safety and Wellbeing — Section 9

The rezoning would result in increased congestion, noise, loss of privacy and safety risks, degrading residential amenity and undermining reasonable community expectations.

8.4 Cumulative and Incremental Impacts — Section 10

Cumulative impacts arising from existing approvals, constrained road capacity, sensitive land uses and parking limitations have not been adequately assessed at the rezoning stage.

8.5 Territory Plan Amendments — Sections 56–59

Deferring critical matters such as traffic, parking, safety and amenity impacts to later development applications is procedurally inappropriate where those impacts arise directly from the zoning change itself.

8.6 Housing Supply and Balance — Section 6(f)

While the Act supports housing supply, it requires a balanced approach that directs growth to appropriate locations without imposing disproportionate impacts on established communities.

8.7 Precedent, Equity and Planning Certainty — Sections 6(d) and 11

Approval would set an undesirable precedent for further re-zoning of surrounding low-density streets, undermining equity, certainty and confidence in the planning system.

Inappropriateness of Deferral to Later Stages

Environmental impacts of this nature are intrinsic to the zoning change itself, not merely matters of construction management or architectural detail. Deferring their assessment to later development application stages is inappropriate where:

- the rezoning enables materially different development outcomes; and
- impacts are foreseeable at the plan amendment stage.

Consistent with the Planning Act 2023 (ACT), rezoning decisions must consider worst case development outcomes, rather than rely on aspirational future design responses or conditions imposed at later stages.

Conclusion

Having regard to the Planning Act 2023 (ACT), we submit that the proposed Major Plan Amendment:

- fails to meet the objects of the Act (s 6)
- does not promote orderly and proper planning (ss 7–8)
- inadequately protects community amenity and safety (s 9)
- fails to assess cumulative impacts (s 10)
- relies on inappropriate deferral of critical matters (ss 56–59); and
- undermines planning certainty and equity (ss 6(d), 11)

Requested Outcome

Having regard to the objects and principles of the Planning Act 2023 (ACT), we submit that the proposed Major Plan Amendment to rezone part of Block 16 Section 25 Braddon from CZ6 – Leisure and Accommodation to RZ4 – Medium Density Residential should not proceed.

The proposal, as currently framed, would enable development outcomes that are incompatible with the established residential character of the area, would give rise to unacceptable impacts on safety, amenity, environmental conditions and community

wellbeing, and does not adequately address cumulative impacts at the strategic planning stage.

We consider that, if the Territory determines further consideration is warranted, any future proposal would require:

- withdrawal of the current amendment and the preparation of a fundamentally revised planning approach,
- early and meaningful community consultation prior to any new amendment being progressed, and
- comprehensive, independent and publicly available assessments of traffic, parking, safety, environmental, climate and cumulative impacts before any change to zoning or development controls is contemplated.

Any future consideration must begin from the existing low-intensity residential context and demonstrate, through evidence rather than assumption, that development outcomes can be accommodated without unacceptable impacts on the neighbourhood or vulnerable community members.



28/01/2026

Re: Draft Plan Amendment 07 – Former Braddon Bowls Club (DPA07)

To whom it may concern,

I write on behalf of the Braddon Tennis Club (BTC) as both a player and committee member.

The club has been part of the Braddon community for nearly 100 years and has consistently maintained positive relationships with its neighbours. BTC supports casual players, competition and social match play, and enjoys a long-standing relationship with Ainslie School. A local coaching business, run by a Braddon resident, also operates from the club.

The Braddon Tennis Club directly adjoins the Former Braddon Bowls Club site and will be one of the most significantly affected parties under the draft plan amendment (DPA07). While we are not opposed to rezoning in principle, the way the amendment is currently presented is misleading. The supporting documents illustrate impacts based on the current RZ4 parameters. However, under the proposed Missing Middle Housing Reform, RZ4 allows for different development standards — including a building height of up to six storeys, not four, as shown in the DPA07 documentation.

Any rezoning must take into account that the tennis club predates all surrounding developments. It is the only sporting facility in Braddon that is not owned by a commercial entity. BTC is run for the community, by the community. Its primary operating hours are outside standard business hours — early mornings and late evenings, seven days a week. Noise and lighting are an unavoidable part of active sporting use.

Although the club has existed long before prospective new residents, it is likely that some will not welcome their balconies overlooking evening and early morning activity. This may lead to complaints regarding long-established characteristics of the neighbourhood. It would be comparable to purchasing an apartment on Northbourne Avenue and then seeking to close the avenue due to traffic noise.

For these reasons, we strongly request that the proposed amendment be reconsidered.

Kind regards,

██████████

Braddon Tennis Club Committee

braddontennisclubcanberra@gmail.com

We firmly oppose the proposed rezoning of the Farrer St block to RZ4. Our objections are based on the potential negative impacts of increased density in an RZ1 residential area, as well as concerns about privacy, traffic congestion, and the preservation of residents' 'quiet enjoyment' of their residence, as provided in their RZ1 ACT Government lease. This also affects nearby childcare, educational, and aged care facilities that align or are situated across the street from the proposed development. Furthermore, residents have not been adequately informed by the Government regarding the implications of this development application, which stems from recent changes to planning laws. Notably, this area was not initially designated for RZ4 development, as it is outside the North Canberra Precinct marked for growth or change.

Current Residential Area:

The area consists predominantly of detached, single-dwelling homes, mainly one to two storeys. It currently functions as a quiet, low-traffic residential zone with limited street parking availability. A childcare centre, an aged care facility, and a primary school—largely single-storey—depend on this quiet environment to deliver suitable care settings. The proposed increase in traffic movements due to the link to the school by the suggested introduction of Farrer lane will increase traffic flow considerably and will impact pedestrian safety and result in a loss of amenity

Excessive Density Adjacent to RZ1 Housing:

Any development beyond RZ2 building heights and density would be incongruous with the existing streetscape in terms of scale and context. Although the location may be suitable for some development, it was not included in the area of the North Canberra Precinct plan identified for growth or change. The Government is contemplating changes that would permit RZ4 zoning, allowing high-density structures up to 21m/6storeys. Such development is currently limited to Northbourne Avenue and town centers. Nowhere else in the ACT does this height and density overlook RZ1 zones. The proposed development compromises privacy at the childcare centre and casts significant shadows, depriving children of sunlight. It also significantly exceeds the recommended density under the MMH guidelines for this area. The projected traffic flows are incompatible with the current street width and pedestrian traffic, and impede necessary drop-off zones for aged care, childcare, and the primary school. Additionally, the Government has not conducted any traffic assessment for the development. The hotel's proposed drop-off zone, situated next to bedrooms at 18 Farrer St, is a completely unacceptable loss of privacy.

Incomplete Consultation and Unfair Process:

The development proposal has not been updated to reflect the impacts of introducing RZ4 zoning. Local residents have not been notified by the Government, despite being outside the North Canberra Precinct areas identified for change and growth, that RZ4 may apply to their street. The community has received no consultation regarding such a density change in their residential area. Proceeding with this rezoning without transparent explanation of the MMH

impact and for the community to be consulted exposes the application and subsequent Government decisions to appeals.

Non-compliance with MMHR:

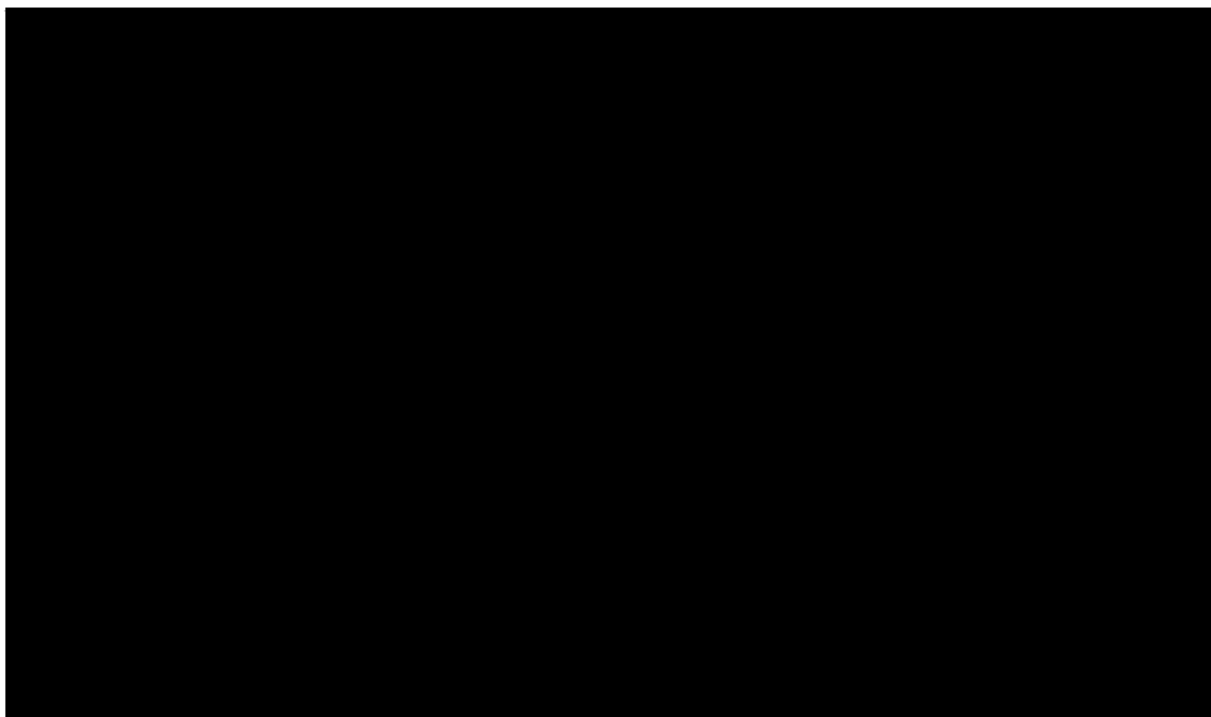
The Development's proposed RZ4 zoning contradicts the MMHR requirements, which advocate for transitional zoning (e.g., RZ1 to RZ2 or RZ3), rather than abrupt escalation from RZ1 to RZ4. Furthermore, this area is not identified as a growth or change zone in the new North Canberra planning framework. Existing drainage and other infrastructure is inadequate to cope with this density.

Lease Variation Charge (LVC) is driving profit seeking

The Government's Lease Variation Charge (LVC) should incentivize the preferred dwelling types. According to the Inner North Precinct Code, the policy should focus on introducing townhouses, duplexes, triplexes, and small-scale apartments. A reduced LVC for these dwelling types would encourage developers and residents to pursue these MMHR-preferred housing styles. The area has a history of dual occupancies, yet the current LVC makes small developments or dual occupancies financially unfeasible and drives developers to large apartment developments to defray LVC cost. The ACT could substantially increase affordable housing by incentivizing dual/triple occupancies through favorable LVC adjustments, allowing *older residents to invest in age-in-place and multigenerational living options.*

Incentivise the release of the largest collective landholding for affordable housing

Individual leaseholders collectively possess the largest share of underutilized land featuring adequate infrastructure and excellent access to services. Encouraging dual occupancies and smaller developments with a reduced LVC could foster smaller-scale redevelopment, stimulating the local building industry without resorting to large apartment complexes and their inherent body corporate challenges. While many people may resist large developments nearby, some families may consider dual occupancy and low rise infill arrangements with friends or family they know thereby achieving housing targets in a more efficient way.



APPENDIX 3 Public consultation version of DPA-07



ACT
Government

**Territory
Planning**
Authority

DRAFT

MAJOR PLAN AMENDMENT

to the

TERRITORY PLAN 2023

Former Braddon Bowls Club

Part block 16 Section 25 Braddon

November 2025

This draft major plan amendment was prepared
under division 5.2.3 of the *Planning Act 2023*

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1.0 Introduction

1.1 Purpose

This document is draft major plan amendment 07 – Former Braddon Bowls Club (DPA-07) to the Territory Plan.

Under section 63 of the *Planning Act 2023* (the Planning Act) the Territory Planning Authority (the Authority) is making DPA-07 available to the public for comment.

Key parts of this document are:

- section 2 – summarises the proposal, including amendments this DPA proposes to make to the Territory Plan and associated documents and details on interim effect
- section 4.1 - summarises when the consultation period ends and how the public can make written comments.
- section 5 – detailed amendment instructions to the Territory plan proposed by this DPA.

1.2 Outline of process

A major plan amendment (MPA) is statutory process under the Planning Act that enables the Territory Plan to be amended. The three types of MPAs are:

- Proponent-initiated
- Authority-initiated
- Minister-initiated

DPA-07 is a proponent-initiated MPA.

For more information about the content of the [Territory Plan](#) and the [major plan amendment](#) processes please refer to the ACT Planning website.

2.0 Proposal

This section outlines the subject site and the proposed amendments to the Territory Plan and supporting documents.

This DPA proposes amendments to the Territory Plan and related documents to allow the intended development as outlined in the supporting report. The amendments proposed to the Territory Plan by this DPA are outlined in section 2.2 and shown in detail at section 5 of this document. There are no consequential amendments proposed to the Territory Plan's related documents in association with this DPA.

The supporting report outlines the intended development for the subject area which forms the basis of how this DPA will amend the Territory Plan. The supporting report proposes to rezone the northern part of the block 16 section 25 Braddon (the Subject Site) from Commercial CZ6 Leisure and Accommodation (CZ6) to Residential RZ4 Medium Density (RZ4).

Background papers for this DPA, including the supporting report and relevant application outcome notice is available on the [ACT Planning website](#).

2.1 Site description

The Subject Site, shown in Figure 1, consists of the northern part of block 16 section 25 Braddon (the Subject Site).

The Subject Site, as shown in Figure 2, is currently zoned CZ6. To the west a pedestrian pathway separates the Subject Site from a childcare centre and the Braddon Bowls Club which are currently zoned Community CFZ Community Facilities and Parks and Recreation PRZ Restricted Access Open Space respectively. To the south is Elder Street and Ainslie School. Apart from Farrer Street to the north the remainder of the Subject Site is bordered by a mixture of single dwelling or multi-unit development within the Residential RZ1 Suburban zone.

The Subject Site is currently vacant after the Braddon Bowls Club, which previously occupied the site, was demolished in 2020.

The Subject Site has previously been the subject of a subdivision application to divide the site approximately in half which was conditionally approved on 29 November 2022. The northern half of the Subject Site, or approximately the first fifty-nine metres of the block from Farrer Street, is subject to this DPA.

The southern part of the Subject Site, which is not part of this DPA, will remain CZ6. In addition, a development application has been lodged and is under assessment for the southern portion of the site for two buildings of three and six storeys containing a hotel, commercial accommodation, shop, indoor recreation facility, outdoor recreation facility and two levels of basement car parking.

DRAFT MAJOR PLAN AMENDMENT 07 – PUBLIC CONSULTATION VERSION

A more detailed site description can be found in the supporting report provided along with this DPA.

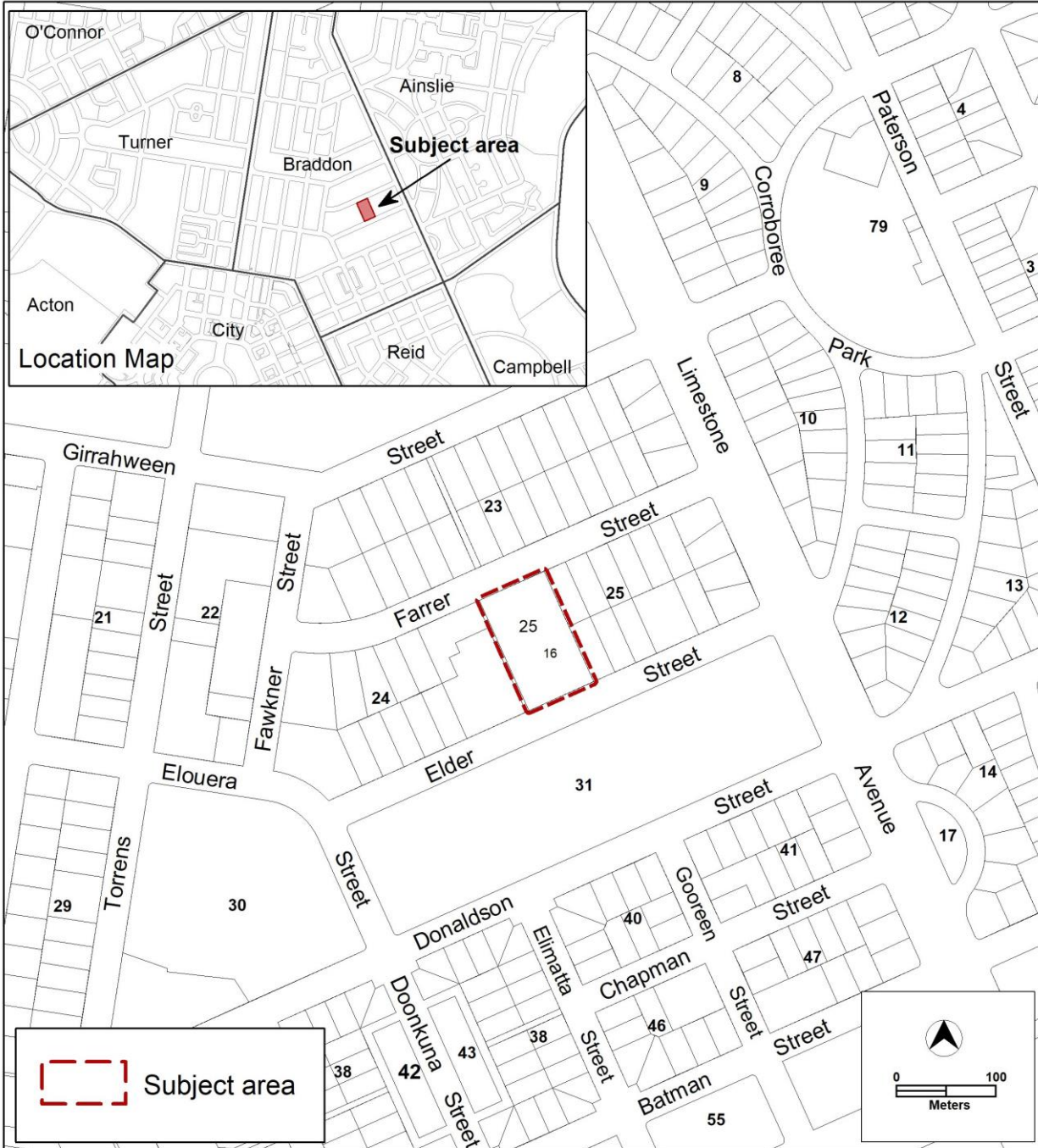


Figure 1 – Locality Map

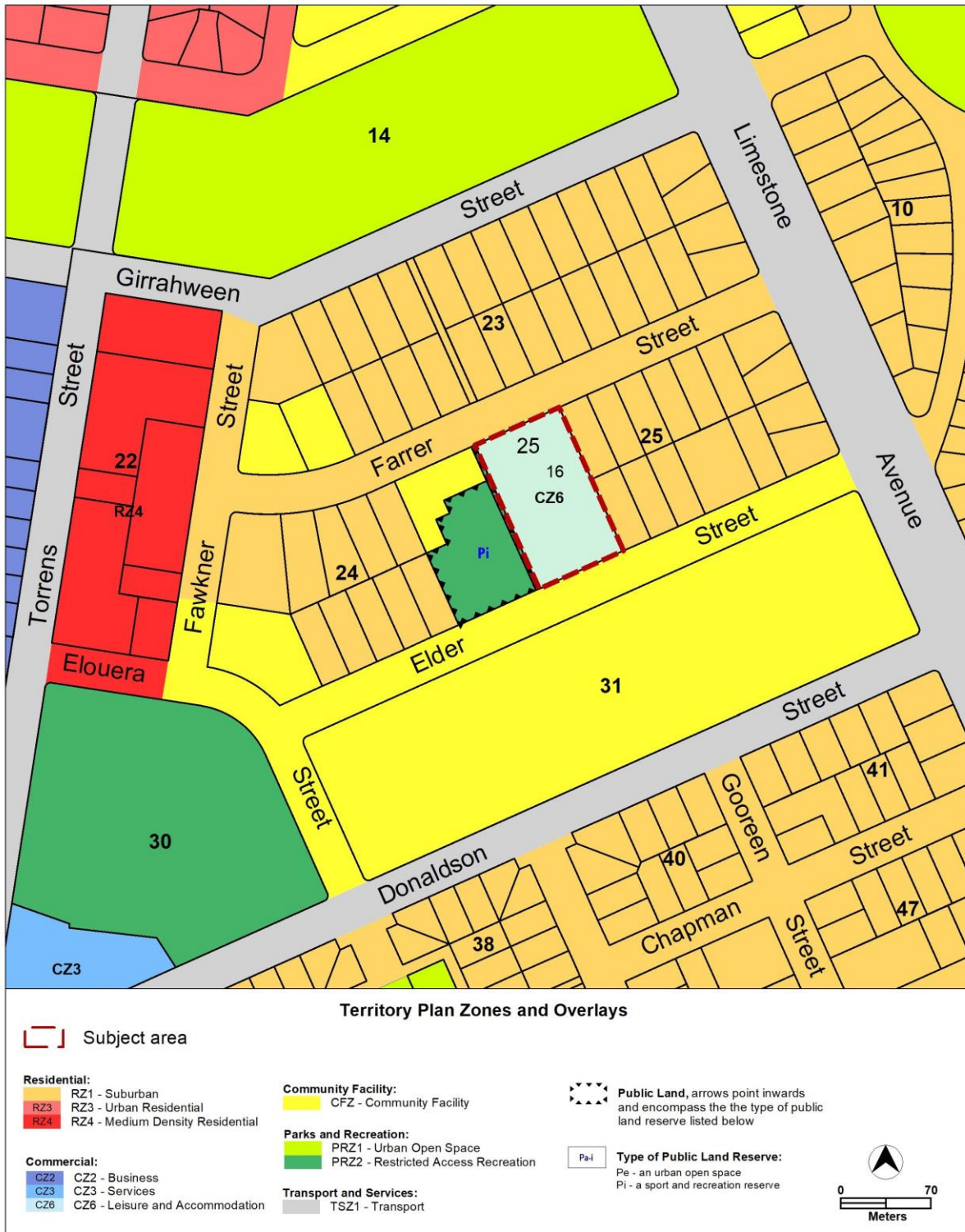


Figure 2 – Existing Territory Plan zoning

2.2 Summary of amendments to the Territory Plan

To give effect to the intended development outlined in the supporting report, DPA-07 proposes to amend the Territory Plan as follows:

- amend the Territory Plan map, as shown in Figure 3 to facilitate residential development on the site

Further detail of the amendments being made to the Territory Plan by this DPA can be found in section 5 of this document.

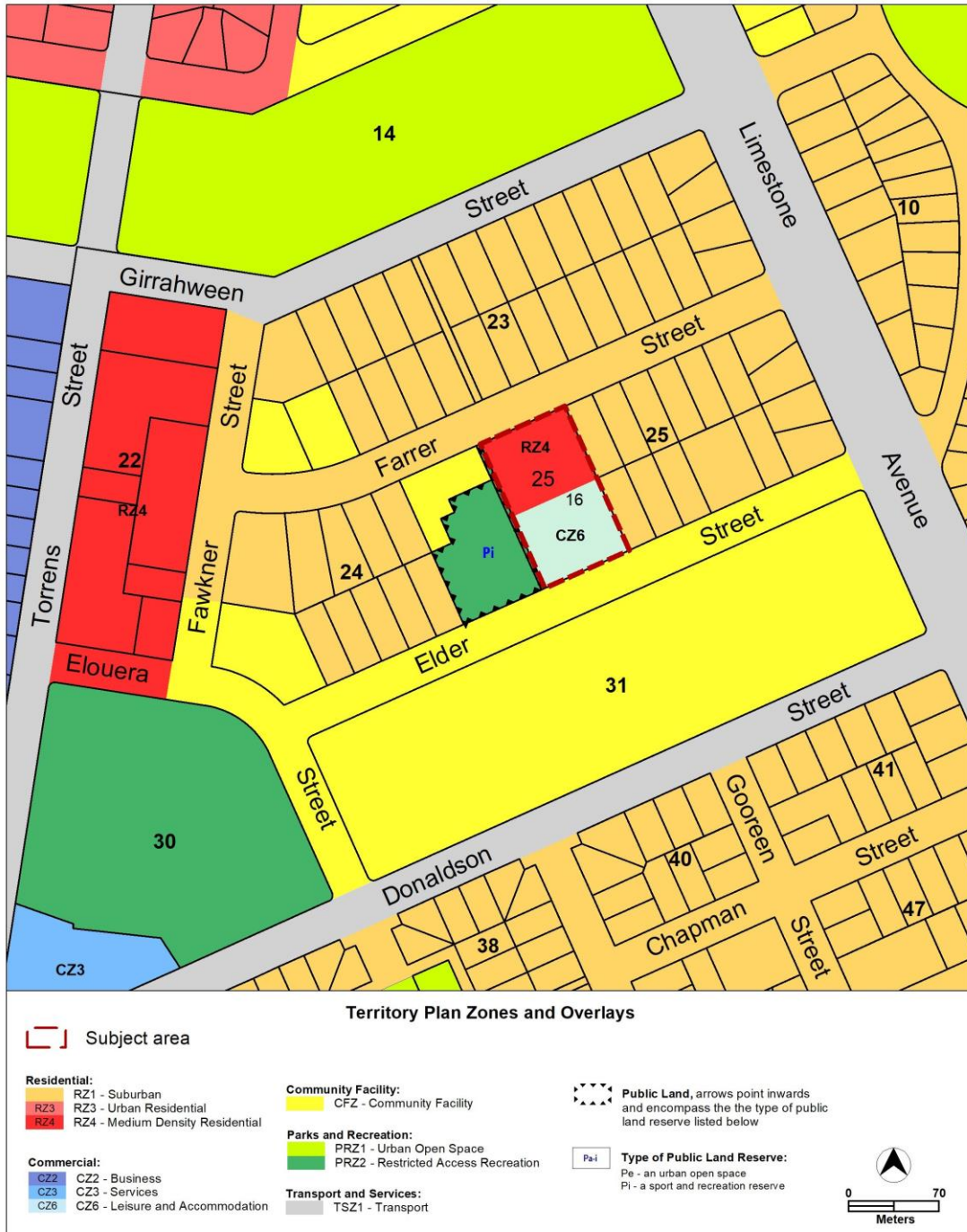


Figure 3 – Proposed Territory Plan zoning

2.3 Summary of consequential amendments to other documents

Documents, such as the technical specifications and development controls are not part of the Territory Plan. Therefore, they cannot be amended as part of an MPA and must be amended separately when/if the DPA commences.

DPA-07 does not propose to consequentially amend any other documents.

For general information about other documents, such as the Technical Specifications or Development Controls, see the [ACT Planning website](#).

2.4 Interim effect

DPA-07 does not have interim effect as section 64 of the Planning Act does not apply to it. Therefore, the current provisions of the Territory Plan will continue to apply to development applications while the DPA remains in draft form.

More information about interim effect is available the [ACT Planning website](#).

3.0 NEED FOR THE DRAFT MAJOR PLAN AMENDMENT

The Inner North and City District Strategy (the District Strategy) builds upon the ACT Planning Strategy's desire for a compact, efficient and liveable city.

The subject site is well located, being near public transport, employment, open space areas and services. Therefore, DPA-07 proposes to rezone the site to Residential RZ4 Medium Density (RZ4) to facilitate development of well-located additional housing mentioned in the District Strategy.

DPA-07 only proposes to amend the Territory Plan. If/When this DPA is finalised, development applications can be lodged for the site which include detailed design proposals and will be release to the public for comment. Therefore, detailed design matters, such as overshadowing, noise, traffic, built form and tree canopy cover will be assessed and decided at development application stage when detailed design is known.

The supporting report also provides further reasoning for the amendments proposed by this DPA. The supporting report is available as part of the 'background papers' for this DPA on the [ACT Planning website](#).

3.1 Application 2025-01

Prior to the preparation of a proponent-initiated MPA the proponent must lodge an application to be considered and accepted by the Authority. The application must be accompanied by a supporting report.

The supporting report must include how the proposal gives effect to the following 'key documents':

- the [Planning Strategy](#)

- the relevant [District Strategy](#)
- any current or proposed amendments to the Territory Plan
- the Statement of [Planning Priorities](#)
- anything else the Authority considers relevant.

In accordance with section 59 of the Planning Act, the Authority accepted application 2025-01 on 5 June 2025 as it was satisfied the intended development outlined in the supporting report gave effect to the ‘key documents’.

Further detail on the reasons for this DPA can be found above. The supporting report and the application outcome notice also contain reasoning for the amendments to the Territory Plan proposed by this DPA

Along with this DPA, as part of the background papers, the application outcome notice and accompanying supporting report are available on the [ACT Planning website](#).

The planning strategy

The ACT Planning Strategy builds off the original vision of Walter and Marion Mahoney Griffin of a city with a landscape that celebrates its bushland setting. ACT Planning Strategy seeks to manage the growth and change of Canberra to not only retain this original vision but to also ensure a city that is compact and efficient, diverse, sustainable and resilient, liveable and accessible.

The application is not inconsistent with the ACT Planning Strategy. Specifically, Application 2025-01 and this DPA gives effect to:

- Strategic Direction One - Compact and Efficient
- Strategic Direction Four – Liveable Canberra and City, and
- Strategic Direction Five – Accessible Canberra of the ACT Planning Strategy.

This DPA gives effect to Strategic Direction One by providing new housing within the existing urban footprint and using existing infrastructure efficiently.

This DPA will give effect to Strategic Direction Four by providing further housing diversity on a well-located site within the inner north and city district.

This DPA gives effect to Strategic Direction Five by providing housing close to existing services, such as employment, commercial, community and public transport uses. The inner north and city district has the largest share of employment in the ACT with almost one-third of jobs.

The relevant district strategy

The district strategies seek to capture and protect the valued character and attributes of the nine districts of Canberra. The district strategies deliver the ACT Planning Strategy by providing more specific and targeted directions for each district. The districts strategies guide the strategic management of growth and change on a district scale in the context of green and blue spaces, good travel connections, housing, employment growth and support commercial areas.

The relevant district strategy for this application is Inner North & City District Strategy (the District Strategy).

To be considered for a major plan amendment a proposal must be consistent with the relevant district strategy. The District Strategy states that the City and Inner North has been earmarked for further residential densification. By 2050, based on projected population there will be a potential demand for up to 24 000 additional dwellings in the City and Inner North alone. The Inner North and City District has great access to services, including retail, nearby employment centres and public transport. The District Strategy outlines that two-thirds of the demand for these additional dwellings shall be met with high density development and a further one-third met with medium density development.

The District Strategy states this district has the largest share of jobs, around one-third of all jobs in the ACT, and a large share of 'knowledge jobs'. Within the district there are tertiary and private education institutions, scientific and industrial research organisations and defence assets. In addition, there is generally better access to community facilities, public transport, open space and active travel facilities than other districts. Delivering more housing closer to existing services, employment and public transport is a key aim of the ACT Planning Strategy and the district strategies.

This proposal is consistent with the District Strategy because:

- the district strategy supports residential growth in well located areas.
- the site is near services, retail, community facilities, public transport and active travel.
- the district is the largest source of employment in the ACT which is expected to grow further by 2050.
- this proposal will result in a more efficient and improved use of land and existing infrastructure
- Further comments about how this application is not inconsistent with the Inner North and City District Policy can be found in the Supporting Report for this application.

Any current or proposed amendments of, or of policies in, the Territory Plan

The Authority released DPA-04 Missing Middle Housing Reform for community consultation on 20 May 2025 and concluded the consultation on 22 July 2025. Written submissions were accepted until 5 August 2025. The Authority is currently considering community feedback in relation to the proposed changes. DPA-04 does not have interim effect, however the Authority notes that this DPA proposes consequential changes that, if enacted, will have influence on this DPA (DPA-07).

DPA-04 proposes, among other things, changes to the Residential Zones Policy including:

- redefining the naming and policy outcomes for all residential zones to differentiate the zones and better target suitable development and redevelopment outcomes within the zones

- adjusting assessment requirements for heights in metres and storeys across all zones. Height in storeys will be in the Territory Plan with height in metres moved to the technical specifications. This shift will control height while reducing pressure on floor-to ceiling heights of developments. The changes across all zones will support the appropriate scaling of height across zones. ...“

DPA-04 proposes that the maximum number of storeys for multi-unit housing in the RZ3 Residential Transition Zone be set at 4 storeys, and for the RZ4 Urban Residential Zone to be set at 6 storeys. The supporting report for DPA-04 available on the Planning Authority website provides further detail about the amendments and why they are needed.

The statement of planning priorities

The relevant minister responsible for planning can set a statement of planning priorities. These planning priorities must arise from the planning strategy and contain actions to be taken in the short to medium term to achieve the priorities.

The current statement of planning priorities was released in 2024 by Minister for Planning and Sustainable Development Chris Steel MLA. The statement contains eight priorities for the Environment, Planning and Sustainable Development Directorate to pursue in the short to medium term. including the following which are relevant to this proposal:

- Plan for more housing in and around key precincts, shops and rapid transport connections
- Enable diverse housing choices and the missing middle.

Two of the eight priorities contained in the statement of planning priorities are directly relevant to this proposal. These priorities are discussed separately below.

Priority One is to ‘Plan for more housing in and around key precincts, shops and rapid transport connections’. The statement expands upon this priority by stating:

- plan for more housing close to shops, services and public transport stops
- facilitate the release of land in the existing urban footprint

This proposal is around 600 metres from Civic and in close proximity the diverse Braddon mixed use precinct. The proposal will bring additional dwellings into an area with a large amount of employment that is close to public transport, existing services and facilities.

Priority Two is to ‘Enable diverse housing choices and the missing middle’. The statement expands upon this priority by stating:

- enable the development of well-designed, sustainable and affordable missing middle housing in existing residential zones

While this proposal does not develop a new guide or is relevant to established RZ1 blocks, it does propose a diversity of higher density housing options, including townhouses. Therefore, for the above reasons, the proposal is consistent with the statement of planning priorities.

Anything else the territory planning authority considers relevant to the amendment

Planning is a complex and ever-changing environment with many stakeholders. Policy or requirements from other areas of the ACT Government or Federal Government, particularly the National Capital Authority, utility providers and interest groups must also be considered when deciding an application to amend the Territory Plan.

There are no further matters the Territory Planning Authority deem relevant to Application 2025-01 or this DPA.

4.0 CONSULTATION

4.1 Consultation with agencies

In accordance with section 62 of the Planning Act the Authority must consult with each of the following in relation to this DPA:

- the National Capital Authority
- the Conservator of Flora and Fauna
- the Environment Protection Authority
- the Heritage Council
- each referral entity
- if unleased or leased public land, each custodian of the land likely to be affected.

Comments received from these agencies will be contained in the consultation report. The consultation report summarises:

- agency comments
- public comments
- amendments made to this DPA as a result of the above two dot points.

The Authority will prepare the consultation report after the conclusion of the public consultation period. If this DPA is not withdrawn the consultation report will be made available to the public when the DPA is given to the Minister for determination.

4.2 Consultation with the public

Written comments are invited from the public on this DPA from **21 November 2025 to 23 January 2026**.

The [ACT Planning website](#) contains information about:

- what information written comments must include.
- how written comments can be submitted.
- the publication of submitted comments on the Authority's website and how personal information is managed.

5.0 DRAFT MAJOR PLAN AMENDMENT 07

This section details how DPA-07 proposes to amend the Territory Plan.

5.1 Amendments to the Territory Plan Map

The relevant part of the Territory Plan map is varied in accordance with Figure 3.

INTERPRETATION SERVICE

To speak to someone in a language other than English please telephone the Telephone Interpreter Service (TIS) 13 14 50

LANGUAGE	DETAILS
English	If you need an interpreter please call: 13 14 50
Mandarin (Simplified Chinese) / 简体中文	如果您需要翻译，请致电：13 14 50
Arabic / العربية	إذا كنت بحاجة إلى مترجم شفهي اتصل بالرقم: 13 14 50
Cantonese (Traditional Chinese) / 繁體中文	如果你需要傳譯員，請致電：13 14 50
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Dari / دری	اگر به یک ترجمان شفاهی نیاز دارید لطفاً به شماره 131450 زنگ بزنید.
Punjabi / ਪੰਜਾਬੀ	ਜੇਕਰ ਤੁਹਾਨੂੰ ਵਿਸ਼ੇ ਦੁਆਰੀਏ ਦੀ ਲੋੜ ਹੈ ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਫੋਨ ਕਰੋ: 13 14 50
Tamil / தமிழ்	உங்களுக்கு மொழிபெயர்த்துரைப்பாளர் ஒருவர் தேவைப்பட்டால் 13 14 50 என்ற எண்ணை அழைக்கவும்
Greek / Ελληνικά	Αν χρειάζεστε διερμηνέα, τηλεφωνήστε: 13 14 50
Italian / Italiano	Se hai bisogno di un interprete, chiama: 13 14 50
Hazaragi / هزاره گی	اگه ده ترجمان ضرورت ده رید، لطفاً ده شماره 13 14 50 تماس بگیریډ
Thai / ภาษาไทย	หากคุณต้องการล่าม กรุณาโทรไปที่ 13 14 50
Karen / ကညီကျိာ်	ဖဲန့မ့ါလိာ်ဘာ်ပုၤကတိၤကျိးထံတၢ်တဂၤအခါဝံသးစူၤကိးဘာ်-၁၃၁ ၄၅၀ တက့ၢ်.

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