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## Draft Plan Amendment 11 – Belconnen Section 65 Block 42

The Belconnen Community Council recommends that this Major Plan Amendment is not approved.

The case for this rezoning depends on figures that don't hold up, a proponent-led community consultation process whose findings were not acted upon, and a precedent that shows the minimum requirements intended to protect community space have already failed in practice.

Belconnen is the ACT's largest district and is growing fast. This is not the time to be reducing the community-zoned land available to its residents.

### Summary

- The Social Impact Assessment's (SIA) per-capita CFZ figures are misleading: they include land occupied by a hospital, a proposed 1,629-dwelling residential development, and a university campus that has itself acknowledged limited connection to the surrounding community.
- Once that land is excluded, Belconnen's community-zoned land per capita falls to approximately 30m<sup>2</sup>/person (below Molonglo, Weston Creek, and Woden) and the SIA's central justification collapses.
- The proponent's own community consultation found residents want more social infrastructure, green space, and community facilities. The proposal, 89% residential, 0% commercial, does not reflect what was heard.
- Minimum zoning requirements have already proven inadequate protection: at Kaleen Indoor Sports Centre, a proposed development on rezoned land tried to count basement car parking as indoor recreation space to meet their minimum threshold, reducing the current recreation use space from 3,823m<sup>2</sup> to an effective 1,052m<sup>2</sup>.
- The University of Canberra's own Connect Up 2617 research found the Belconnen Town Centre lacks social infrastructure and accessible gathering places, a finding that directly contradicts the SIA's conclusion that existing community land provision is adequate.
- The Education Directorate's concerns about school capacity were largely met with undertakings to address issues later, rather than evidence they have been addressed now.



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- The public experience of just the last six months alone directly contradicts the SIA's finding of adequate provision: a community service was displaced outside the district entirely due to lack of available sites, and sustained community concern over Big Splash and the Kaleen Indoor Sports Centre reflects demand that is outstripping supply.
- The Belconnen suburb population has tripled since 2006 and is forecast to reach 16,000 by 2065. Community infrastructure is not keeping pace with growth.

## 1. Introduction

The Belconnen Community Council (BCC) is the peak community advocacy body for the Belconnen district of Canberra, representing residents, workers, students, and property holders. The BCC submits that this Major Plan Amendment should not be approved.

This site is currently zoned Community Facility Zone (CFZ), reflecting a recognition that the land has a role to play in serving the needs of the Belconnen community. The proposal would rezone the site to allow a development comprising approximately 32,000m<sup>2</sup> of residential floor area and 4,000m<sup>2</sup> of community space, an 89% residential, 0% commercial outcome that the proponent characterises as 'mixed use.'

The BCC supports housing growth in Belconnen. What it does not support is housing growth that systematically underprovides the community infrastructure that makes dense urban living liveable, particularly when that underprovision is justified by figures that do not withstand scrutiny. This submission is not an objection to development. It is an objection to approving this rezoning on the basis of an inadequate case that doesn't deliver for the current and future Town Centre residents.

The BCC's objection rests on the following interconnected grounds, which this submission addresses in turn:

- The Social Impact Assessment contains a critical methodological flaw that renders its central per-capita finding unreliable;
- The proponent's own community consultation identified needs that this proposal does not meet;
- Existing minimum zoning protections have demonstrably failed in comparable circumstances; and
- The proposal is inconsistent with the University of Canberra's own research on social infrastructure need in the Belconnen Town Centre.



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## 2. The Social Impact Assessment is Misleading

### The Core Claim

The Social Impact Assessment (SIA) submitted by the proponent makes the following claim to justify the loss of community-zoned land:

"The site currently represents a minimal proportion (0.24%) of Belconnen's extensive CFZ allocation. Given that Belconnen holds the largest share of CFZ land in the ACT (31%), providing approximately 41 square metres per person, the rezoning is anticipated to have negligible impact on the district's capacity for community infrastructure provision."

This figure (41m<sup>2</sup> of CFZ land per person) is the SIA's primary quantitative justification for the rezoning. The BCC submits that this figure is, at best, a significant methodological error, and that its effect is to substantially overstate the amount of genuinely accessible community land available to Belconnen residents.

### What the SIA Includes in Its Calculations

The SIA's CFZ per-capita figures are derived by treating all land zoned CFZ within the Belconnen District as equal community land available to the Belconnen public.

However, the area enclosed by Ginninderra Drive, Hayden Drive, Aikman Drive, and College Street is all considered CFZ land and is approximately 1.18million m<sup>2</sup>.

This area includes three categories of land that are not, in any practical sense, a like-for-like replacement for general community use:

- The University of Canberra Hospital;
- The PEET Bruce residential development, which has an intended yield of 1,629 dwellings.
- The University of Canberra campus itself.

In 2021, the University of Canberra's then Vice-Chancellor explicitly noted that the university's new master plan envisaged 'a campus connected to their surrounding suburbs' - an aspiration, not a description of existing access.

The inclusion of these three land parcels amounts to approximately 1,182,771m<sup>2</sup> of the total, or roughly 10.6m<sup>2</sup> per person. While technically accurate as a measure of CFZ-zoned land, it bears little relationship to the question of whether Belconnen residents have adequate access to community facilities and public space.



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### The Corrected Picture

When the University of Canberra campus, the UC Hospital, and the PEET residential development are excluded from the calculation, the per-capita CFZ figure for Belconnen falls to approximately 30m<sup>2</sup> per person.

At approximately 30m<sup>2</sup> per person, Belconnen sits behind Molonglo, Weston Creek, and Woden Valley, and at roughly the same level as Tuggeranong. This is not the position of a district with a surplus of community land. It is the position of a district where any further reduction in CFZ land should require extremely compelling justification.

The BCC submits that the proponent has not provided that justification, and that its per-capita figures should not be relied upon by ACT Planning in assessing this proposal.

### Population Growth Makes This Worse, Not Better

The SIA includes demographic analysis of the Belconnen suburb, noting its young and culturally diverse population, high proportion of lone-person and group households, and lower-to-middle income profile. What the SIA does not note is the trajectory of population growth in the area.

The Belconnen suburb has grown from approximately 3,100 residents in 2006 to over 9,000 in 2025. It is forecast to reach 16,000 by 2065. Per-capita figures calculated on today's population will deteriorate further as growth continues, and any loss of CFZ land is effectively permanent.

### CFZ Land in the Belconnen Town Centre

The district-wide per-capita analysis referenced in sections 2.2 and 2.3 may be the appropriate lens for assessing long-term community infrastructure capacity across Belconnen.

However, it is also worth examining the impact of this rezoning at the town centre scale, the area where residents, workers, and students most directly access community facilities.

Within the Belconnen suburb boundary, there is currently approximately 134,473m<sup>2</sup> of Community Facility Zone land. This site, at approximately 10,378m<sup>2</sup>, represents around 7.7% of that total.

Rezoning this site would therefore result in a 7.7% reduction in CFZ land within the Belconnen Town Centre itself.



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The proponent characterises the impact of this rezoning as negligible, citing a 0.24% reduction in Belconnen's district-wide CFZ allocation. At the town centre scale, where the impact on residents is actually felt, the figure is 7.7%. That is not a rounding error. It is an order of magnitude larger, and it is the more honest measure of what this community stands to lose.

### **3. The Proponent's Consultation Report Does Not Support This Proposal**

The proponent conducted community consultation as part of the Major Plan Amendment process and submitted a Community Consultation Report. The BCC notes two significant concerns arising from that report.

#### **Community Priorities Were Not Reflected in the Proposal**

Question 4 of the community consultation asked respondents: 'What would you like to see more of in the town centre?' The responses indicate clear community preference for social infrastructure, public space, community facilities, and amenities that support gathering and connection.

The proposal as submitted, 89% residential floor area, 0% commercial, and only 11% community space, is not a response to those preferences. A development that is overwhelmingly residential in character, with a token community component, does not constitute the 'blend of commercial, residential, and civic amenities' the proponent describes in its own planning rationale.

#### **Education Directorate Concerns Were Not Resolved**

The Education Directorate raised concerns during the consultation process about the impact on local schools, particularly the neighbouring UC Lake Ginninderra College. The proponent's response to these concerns was, in substance, that the matter would be worked through in subsequent stages, and that it was intended the concerns would not materialise.

The BCC does not consider this an adequate response to a substantive infrastructure concern raised by a government directorate. If the concerns raised by the Education Directorate cannot be addressed adequately at the time of a rezoning decision, the rezoning decision should not proceed.



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#### 4. Minimum Protections Have Already Failed in Practice

One of the mechanisms available to ACT Planning to mitigate the impact of rezonings from community to other uses is the imposition of minimum requirements for community or recreation facilities in the resulting development. The proponent's proposal includes a community space component, and it may be suggested that this represents an adequate protective mechanism.

The BCC draws attention to recent events at the Kaleen Sports Centre as direct evidence that minimum requirements do not, in practice, guarantee good outcomes.

**PRECEDENT:** The Kaleen Sports Centre was rezoned in 2021 from Parks and Recreation (PRZ2) to Commercial Mixed Use (CZ5), with a condition requiring a minimum of 1,400m<sup>2</sup> of indoor recreation space to be provided in any development.

The Development Application submitted since states that 1,773m<sup>2</sup> of indoor recreation space has been provided, satisfying this requirement. However, 772m<sup>2</sup> of this figure is basement car parking.

The true indoor recreation area is therefore 1,052m<sup>2</sup>, a reduction from the 3,823m<sup>2</sup> currently operating as a club and indoor recreation facility, and below the nominal minimum threshold.

The BCC notes that the Kaleen situation has yet to be resolved under the ACT's new outcomes-focused planning system. However, it demonstrates clearly that a developer with legal advice can interpret minimum requirements in ways that substantially undermine their intent, and that by the time this becomes apparent, the rezoning has already occurred.

The imposition of a minimum community space requirement at this site does not, in the BCC's view, provide adequate protection. The Kaleen precedent suggests the floor can become the ceiling, and that the ceiling can be gamed.

#### 5. This Contradicts the UC's Own Evidence on Social Infrastructure

In March 2026, the University of Canberra's *Connect Up 2617* project found that the Belconnen Town Centre lacks sufficient social infrastructure and accessible third places: informal public spaces where people can gather, connect, and participate in community life.

The research found this absence is having a tangible impact on the wellbeing of people who live, work, and socialise in the area, particularly among the young, culturally diverse, and



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lower-income populations that the SIA itself identifies as characteristic of the Belconnen suburb.

The SIA concludes that existing community land provision is adequate and that this rezoning will have negligible impact. Connect Up 2617 concludes that social infrastructure is insufficient and that its absence is causing harm. These two findings cannot both be correct. The BCC submits that the Connect Up 2617 research, grounded in direct community engagement, should carry significant weight.

### **6. This Contradicts the Public Discourse on Community Facilities**

The SIA's conclusion that community land provision in Belconnen is adequate sits in uncomfortable contrast with the recent public lived experience, which tells a different story.

In late 2025, the pending closure of the SDN Bluebell Centre in Belconnen attracted significant media attention. The centre — a long-standing provider of community services — was unable to secure an alternative location within the district due to ongoing redevelopment pressures on available sites. A new location was eventually found, but outside the Belconnen district entirely, in Gold Creek. This is not an abstract planning outcome. It is a community service that Belconnen residents lost to their own district because the land to accommodate it could not be found.

This is not an isolated case. Community petitions and sustained media coverage around proposed redevelopments at Big Splash and the Kaleen Indoor Sports Centre reflect a pattern of community concern about the adequacy of recreational and community space in the town centre and surrounding suburbs. These are not the signs of a community with surplus capacity. They are the signs of a community where demand for accessible, local facilities is outstripping supply.

The BCC submits that this public record should weigh heavily against a finding that any further reduction in CFZ land in the Belconnen Town Centre will have negligible impact.

### **7. Conclusion and Recommendation**

The Belconnen Community Council submits that the case for this Major Plan Amendment has not been made. The Social Impact Assessment's central quantitative justification is based on figures that conflate genuinely accessible community land with a hospital, a major residential development, and a university campus. Once these are excluded, Belconnen's per-capita community land provision is unremarkable and declining under population pressure.



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The proponent's own consultation found community preferences that this proposal does not meet. UC's own social research found social infrastructure deficits in the Belconnen Town Centre that this rezoning would worsen, not address. The minimum protections that might otherwise provide some safeguard have already been shown, at Kaleen, to be inadequate in practice. The displacement of the SDN Bluebell Centre to Gold Creek, and sustained community concern over Big Splash and the Kaleen Indoor Sports Centre, tell the story of a district where demand for community space is growing, not declining.

The BCC recommends that this Major Plan Amendment is not approved.





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### About the BCC

- The Belconnen Community Council (BCC) is a non-partisan, volunteer-driven organisation that aims to be at the forefront of advocating for our region, making it an even more attractive place to live, work, and enjoy life.
- The BCC represents the interests of its members and the community to the ACT Government and other stakeholders on various matters affecting the people who live, work, and play in the Belconnen District.
- The Belconnen Community Council receives support and funding from the ACT Government.

