

15 May 2025

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Dear Ms Moylan

**Re: DA.2023.0635 Tuggeranong Valley Rugby Union and Sports Club Limited
PPSSTH-340**

In accordance with the NSW Regional Planning Panel Guidelines, please accept this submission for DA 2023.0635 Construction of a registered club premises at 37 Tompsitt Drive, Jerrabomberra; from Queanbeyan Palerang Regional Council as formally endorsed at the 14 May 2025 Council meeting.

The elected Council's submission has not been prepared by Planning staff involved in the assessment of the application. Councillors who have a role on the Panel did not participate in the preparation of the submission. In addition, Councillors who are QPRC representatives on the Southern Regional Planning Panel, declared an interest in this matter and removed themselves during the Public Forum and when this item was being debated in the Council Chamber.

Council has authorised the General Manager to address and present this submission to the Regional Planning Panel, upon notification of the determination meeting.

Yours faithfully,



Rebecca Ryan
General Manager
Queanbeyan-Palerang Regional Council

Attached: QPRC Submission DA2023.0635

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Queanbeyan Palerang Regional Council Submission:

DA 2023.0635 Registered Club Premises at 37 Tomsitt Drive, Jerrabomberra

Executive Statement

Council submits that the proposed development at 37 Tomsitt Drive, Jerrabomberra, is inconsistent with the intended planning framework and community expectations for the area.

The proposal raises significant concerns regarding neighbourhood character, community amenity, environmental loss, and social outcomes.

Based on the numerous outstanding matters of concern that have not been addressed by minor modifications, Council is not able to support the development application at this location.

1. Consistency with Local Strategic Planning

The proposed development is inconsistent with the objectives of the B1 – Neighbourhood Centre zoning, which is intended to support small-scale, neighbourhood-serving commercial and community uses.

The proposed use – a large-scale club trading until 2am daily – does not reflect the scale, character, or intent of this zoning. Council's strategic planning seeks to preserve the liveability and residential character of Jerrabomberra, which this proposal risks undermining.

The development application does not comply with statutory controls and non-statutory guidelines.

2. Community Impact and Amenity

The development site is within 50 metres of residential properties. Concerns raised by the community include anticipated impacts on amenity through increased noise, traffic, overshadowing, and late-night operations. The proposed inclusion of outdoor dining and drinking areas would exacerbate adverse impacts on residents' amenity.

Residents are particularly concerned about the site's suitability, given its proximity to homes and the potential for adverse lifestyle impacts in an otherwise quiet residential setting.

Acoustic impacts are of particular concern because of the proposed late hours of operation (until 2 am) in conjunction with outdoor drinking and dining, and maximum occupancy of 1,320 patrons.

3. Heritage and Character

The proposed three-storey contemporary structure is out of scale and inconsistent with the prevailing residential character, which largely consists of single and two-storey homes built in the 1990s.

The bulk, scale and architectural form of the proposed development will visually dominate the existing streetscape and detract from the suburban aesthetic. This proposed development also fails to provide an appropriate transition to the surrounding grassland that is zoned for conservation.

4. Traffic, Access and Parking

Council notes that the traffic impact assessment underpinning the DA does not reflect recent changes to local traffic volumes – notably the completion of Jerrabomberra High School and the South Tralee residential development. Community concerns include increased vehicle movements, pressure on parking availability, and congestion on Tomsitt Drive.

An updated and comprehensive traffic study would be required to accurately assess impacts.

5. Environmental and Sustainability Considerations

The site comprises existing bushland with native flora and fauna. Community submissions stress that the proposed development would result in total clearance of the natural environment, with associated impacts on biodiversity and local ecosystems. Concerns have also been raised about the adequacy of stormwater management, landscaping integration, and broader environmental sustainability measures.

6. Infrastructure and Service Provision

Community feedback highlights anticipated additional pressures on local infrastructure and services, particularly law enforcement and road maintenance. The potential for late-night noise and antisocial behaviour may increase demands on police.

7. Community Engagement and Submissions

Residents report limited and inadequate engagement from the applicant. Information presented during consultation was viewed as unclear, inconsistent, and sales-focused, with little opportunity for genuine dialogue or clarification. Key concerns around noise, social impact, and visual dominance remain unresolved.

8. Public Interest and Social Outcomes

Monaro Police Command have consistently identified late night service of alcohol as a risk factor for alcohol-related and street crime and noted their limited resource capacity to attend to incidents after midnight. They have recommended earlier closing times to mitigate this risk but the slightly modified closing time of 2 am still exceeds the Police recommendation.

The inclusion of up to 160 poker machines has raised strong community concern about gambling-related harm and the potential extraction of economic resources from the local community. The club is not affiliated with any sporting activity and is perceived as a hospitality and gambling enterprise.

Local sporting clubs have expressed concern that financial benefits may be diverted across the border to the ACT, negatively impacting community-level sport and inclusion in Queanbeyan.

Queanbeyan-Palerang Local Government Area already has a substantial number of gaming machines. The Fourth Quarter 2024 report published by Liquor and Gaming NSW shows 790 electronic gaming machines across 15 premises (630 of which are in eight clubs; and 160 in seven hotels). The combined weekly losses totalled \$1,432,557.

Agencies that provide support services to people facing financial hardship including a risk of homelessness have identified gambling as a factor in some cases of financial hardship among members of the Queanbeyan City population.

The potential for social harm was recognised in the Independent Liquor and Gaming Authority's refusal of an application by the operators of Queanbeyan Bowling Club in Queanbeyan City for a 27% increase in the number of gaming machines. (Decision of 3 April 2024 on application 1-8620117004.) The Statement of Reasons was as follows:

- *Overall, we are concerned that approving the application is likely to be detrimental to the well-being of the local or broader community. We are not satisfied that the proposed increase will provide a positive contribution towards the local community.*
- *We note that it is the third LIA application from the venue since 2019 and that the proposed increase would result in an overall increase of 60 machines since that time.*
- *We are concerned that the proposed 27% increase on the venue's current number of gaming machines is considerable, particularly due to the venue operating in an area where there is a high density of gaming machines and availability of late night gaming, both factors which contribute to high rates of gambling harm.*

The club has stated publicly that building in New South Wales is a response to the ACT Government's gambling reform policy under which gaming machine license holders are being invited to voluntarily surrender their licenses. The program has reduced the number of gaming machines from 4,956 in 2018 to 3,494 at 2 May 2025. Two venues have voluntarily surrendered all their gaming machine licenses.

The ACT's program is directed at reducing gambling harm but, having regard to the close proximity of Queanbeyan City, the introduction of more gaming machines in Queanbeyan-Palerang will undermine this program and achieving its target of no more than 1,000 gaming machines by 2045.

The ACT Government acknowledged this in a report published in The Canberra Times on 11 June 2024:

- *In a statement, it stood by decreasing the number of machines in ACT clubs but recognised a difficulty, saying: "One barrier to reducing the impact of problem gambling in the ACT is the easy access gamblers have to machines just across the border in NSW."*