

22 May 2025
Our file – 22-096

Amanda Moylan
Senior Case Manager
Southern Regional Planning Panel
12 Darcy Street
PARRAMATTA NSW 2150

Attention: Amanda Moylan

Application: Registered Club
37 Tomsitt Drive Jerrabomberra
Council ref: 2023-0635

Dear Amanda,

We refer to the notification of the public determination briefing with respect to the proposed registered club to be constructed in stages and Queanbeyan-Palerang Regional Council's planning report (the Council report) submitted to the Planning Panel (the Panel) for their consideration.

This letter has been prepared to assist the Planning Panel in their consideration of the application with a focus on the key matters that have been raised in Council's report. The letter has been structured to address those key matters and to provide further context on the work that has been undertaken by the proponent to proactively resolve as follows:

1. **Vikings and the Local Community**
2. **Social Impacts and Community Engagement**
3. **Amenity and Acoustic Impacts**
4. **Site Suitability**
5. **DA Assessment Timeline**

Since the last briefing of the Panel at the end of 2024 and our meeting with Council staff in early 2025, the project team has been working hard to address the matters that have been raised throughout the assessment period. We have met with Council and sought to keep them engaged with respect to the progress being made. Key amongst this was the proponent-initiated community engagement undertaken between 10 February 2025 and 16 March 2025.

The following documents were submitted on 16th May 2025 which addresses many of the key matters raised in the Council report:

- a) **Attachment A:** Summary of the community engagement that was undertaken by the proponent between 10 February and 16 March 2025. This details the extensive community engagement including with the nearest residences and the broader community;
- b) **Attachment B:** Operational Noise Emission Assessment prepared by Acoustic Dynamics which addresses the matters raised in the peer review undertaken on behalf of Council and confirms that the noise impacts can be appropriately mitigated and managed;
- c) **Attachment C:** Minor amendments have been made to the plans which adopt the design recommendations from the Operational Noise Emission Assessment including:
 - o Baffles within the landscaping to provide further acoustic mitigation;
 - o Airlocks within first floor level benefitting the function rooms; and
 - o Acoustic screening to the outdoor dining area adjoining the pond.

As a result of the publication of Council's report we were made aware that an independent consultant (Barr Planning) had been engaged to peer review the Social Impact Assessment submitted with the application. On learning this, we sought to ensure that the Assessment is updated to capture the engagement that has been undertaken and addresses the recommendations of the peer review. As such the following additional documentation has also been lodged on 22nd May 2025:

- d) **Attachment D:** Amended Social Impact Assessment prepared by Hill PDA;
- e) **Attachment E:** Cover letter prepared by Hill PDA in response to peer review;
- f) **Attachment F:** Legal Advice prepared by Lindsay Taylor Lawyers;
- g) **Attachment G:** Amended Waste Management Plan.

For the record we object to the recommendation to refuse the development as detailed in the Council report. It is our view that the threshold matters have been adequately resolved through the submission of supplementary documentation and amended plans to enable the Panel to determine the application by way of approval. We believe the issues raised by Council and the Panel have been satisfactorily addressed and that there is no basis for concluding that the site is not suitable for the development.

Should the Panel be of the view that there remains outstanding threshold matters that would preclude the granting of a development consent for the entirety of the development, then we consider it would be appropriate and legally possible to determine the application by way of a part approval pursuant to section 4.16 (4) of the EP&A Act 1979.

With respect to the Council report, we do express concern with its content and adequacy to inform an assessment by the Panel. There are aspects of the report which have the potential to mislead including the use of an outdated aerial photo to the extent that it includes structures on the site that have long since been removed and does not show established commercial development within the centre. Further, an incomplete timeline has been provided that does not demonstrate the level of communication and engagement between the applicant and Council demonstrating the progress being made in key aspects of the assessment.

In addition, Council refers to engagement undertaken with NSW Police dating back to December 2024 as a basis for their objection to the proposal. It is not clear whether Council has reengaged with NSW Police in light of the amended Alcohol Plan of Management or amended hours of operation lodged in February 2025 and which specifically address the concerns of NSW Police.

Response to Key Matters & Council's Reasons for Refusal

1. Vikings and the Local Community

Who are the Vikings – Local Presence Campbell & George

Relevant to whether the registered club once approved is capable of being managed in a manner that safeguards the amenity of nearby residents and provides a service for those who live in the local area is the manner in which the Vikings Club as owner/operator currently operates.

The Vikings Club (the Vikings) is a significant current contributor to the ACT and Queanbeyan regional community, providing employment for over 350 staff that live and reside across the ACT, Queanbeyan and Jerrabomberra. The Club has a net output of over \$40 million a year to local suppliers and employees. Having first established in 1978 the Club now operates 5 Licensed Clubs across the ACT and NSW.

The Vikings membership exceeds 55,000 with over 20% of those members unique to the Campbell and George Club (formerly the Queanbeyan Bowling Club). Over 2000 of those members reside in Jerrabomberra.

Talks commenced with the Queanbeyan Bowling Club in 2014, which had entered into voluntary administration at that time. Vikings traded the club out of administration and facilitated an amalgamation with the Queanbeyan Sports and Community Club becoming the new entity (trading as Campbell & George) with Vikings managing the Club. As part of this process Vikings paid out the creditors 100 cents in the dollar amounting to circa \$1.5 million dollars, ensuring that many local traders would not be left out of pocket as a result of the demise of the Bowling Club. In 2019 a major renovation of the Campbell & George was undertaken with an investment in the premises of circa \$8 million.

Campbell and George under Vikings management has been a success for both the community and members. The Club has worked closely with neighbours, Council, and the local Police to ensure the growth from 1200 to 12000 members has not impacted residents or the community in a negative way. The Vikings Group has breathed life into a community asset that Queanbeyan residents value and support and provides an added attraction to the region.

Rather than the perception of the Vikings being a new operator within the area they clearly have an established presence in Queanbeyan. They have demonstrated themselves to be responsible operators with a commitment to the community reflected in their burgeoning local membership and direct support to community groups. The establishment of the proposed club within Jerrabomberra seeks to strengthen this commitment.

Community Participation

Since the Vikings have taken over the operation of the now Campbell & George, the Club has provided support to the amount of \$725,000 to the local community as follows:

- Queanbeyan Cricket Club -\$60k for 4 years
- Queanbeyan Whites Juniors - \$5k
- Bella Monaro Soccer -\$30k over 4 years
- Queanbeyan Bowling Club - \$500k over 4 years
- Jerrabomberra Park run \$15k
- Queanbeyan Croquet \$25k over 4 years
- Club Grants \$90k over 4 years

Since its inception the Vikings Group has provided more than \$40 million dollars to the community including ongoing support for the following organisations:

- the ACT Brumbies
- Lifeline
- Oz Harvest
- Marymead CatholicCare – Canberra & Goulburn
- Brumbies W league
- Vinnies
- Kids into Sport Program
- 52 Affiliated sports Clubs from BMX racing to netball to bowls tennis and rugby

Gaming and Alcohol

Vikings has a long history of going 'above and beyond' to acknowledge the social license as providers of Gaming and Alcohol. This includes two significant programs now running for over 8 years:

- **Don't waste Tomorrow** – a program designed to encourage responsible consumption of Alcohol. Corner stones of that program include awareness of excess consumption and the negative effects it can have on day-to-day life. Don't waste tomorrow is a message we champion in our venues to make our members stop and think before buying their next drink
- **Play within your limits** – a program that has been in place in Canberra and Queanbeyan Clubs to promote the responsible conduct of Gaming. The Club instigated this program above and beyond the requirements of State and Territory Legislation to promote our views on sustainable gaming practices both to our members and the community. Corner stone elements of the program include:
 - Above legislated numbers of Gaming Contact officers in all venues
 - Ask for Andy – campaign. An initiative that is promoted to members to discretely ask for help without the stigma of identifying as a problem gambler. A member experiencing harm can discretely approach any staff member and "Ask for Andy". The staff member then knows to immediately seek help from our Gambling Contact Officers and provide the necessary support required.

The Vikings Board supports these initiatives as part of their Strategic Plan initiatives. In addition to this the Vikings Group has a robust Anti-Money Laundering/Counter-Terrorism Financing program in place to prevent the misuse of gaming facilities by bad actors.

Employment

Vikings employees over 350 staff across Queanbeyan and ACT. This will increase by close to 90 staff – all from the local region should the development be approved. Current staff live and reside in Queanbeyan, ACT and Jerrabomberra. The Viking Club President is in fact a resident of Jerrabomberra. Two (2) senior

managers are also residents of Queanbeyan and Jerrabomberra. Opportunities that will be provided for future staff should the development be successful would include:

- Club Management
- Marketing
- Accounting
- Greenkeeping
- Chef and F&B management
- Community Sports management
- Information technology
- Human Resources Management
- Facilities management

2. Social Impacts and Community Engagement

Since the briefing of the Panel late last year and following further discussions with Council, the proponent has undertaken their own extensive community engagement with the nearest sensitive receivers to the east and with the broader community. Engagement was undertaken between 10th February 2025 and 16 March 2025. A report has been prepared summarising the methodology for the community engagement and its outcomes.

It was made clear both to the public and to Council that the proponent was undertaking this community engagement. An email was sent to Council on 7th February 2025 which provided details of the intended strategy. The project team continued to engage with Council throughout the process to keep them informed of progress, refer to section 5 of this letter detailing the interactions.

The proponent led engagement has not been clearly considered by Council in their assessment noting their view of the 186 emails in support of the application as not being 'formal' submissions (pg. 55 of Council's report). For the benefit of the Panel, we have sought legal advice (see **Attachment F**) which considers among other matters how those submissions received that did not include a political disclosures statement should be considered under the EP&A Act 1979, the main points which are summarised below:

28 Both section 10.4(5) of the EPA Act and the Council's CPP do not require a relevant public submission to include a statement as to whether or not a reportable political donation and gift was made.

29 A person making a relevant public submission is only required to make a disclosure if they have made a reportable political donation and gift.

30 Provided that the authors of the 186 emails did not make reportable political donations and gifts, then those emails will be 'submissions made in accordance with [the EPA Act] or the regulations' and are required to be considered pursuant to section 4.15(1)(d) of the EPA Act.

31 Irrespective of this, the 186 emails are public interest matters for consideration pursuant to s4.15(1)(e), noting again the breadth of matters that may be taken into account as an element of the public interest.

Therefore those 186 submissions in support of the application are to be considered public submission in accordance with s 4.15(1)(d) of the EP&A Act 1979.

The engagement that has been undertaken by the proponent clearly addresses the matters raised in Council's report with respect to the direct engagement with those nearest sensitive receivers referred to as 'Tier 1 Stakeholders'. The outcomes and analysis have now been considered and incorporated as part of the final amended Social Impact Assessment (SIA) (see **Attachment D**).

This also addresses the recommendations of the peer review undertaken by Barr Planning and are specifically considered by Hill PDA in their cover letter (see **Attachment E**).

The methodology for engagement implemented by the project team can be generally summarised as follows:

- Public notification of engagement as follows:
 - Media release on 21 February 2025 announcing public exhibition, opening times and drop-in sessions;
 - Briefing to Canberra Times on 20 February 2025 regarding public exhibition;
 - Briefing to Win TV on 14 March 2025 promoting extended notification and encouraging community participation;
 - Social media posts and re-posts in February 2025 to promote notification, pop-up exhibition and drop-in sessions and opportunities. Provided on the QPRC Facebook page and Jerrabomberra Community Noticeboard. Reposted on Googong Residents Association, Campbell & George Facebook page and Vikings Group Facebook page;
- Drop-in sessions as follows:
 - Letterbox drop comprising 165 invitations on Sunday 16 February 2025 to neighbours and near neighbours, to provide notification of exclusive drop-in sessions on Thursday 20 February 2025;
 - 2 exclusive sessions for sensitive receivers on Thursday 20 February households (2pm-4pm and 7pm-8:30pm), with the Jerrabomberra Residents Association (JRA) and media present at the latter session;
 - Letterbox drop on Tuesday 25 February 2025 to near neighbours (30 residents), to provide notification of 4 remaining drop-in sessions
 - Communication with JRA for promoting drop-in sessions, and the organisation of additional sessions 6 public drop-in sessions: Friday 21 February, Saturday 22 February, Friday 28 February and Saturday 1 March 2025 (between 10am-12pm); and Wednesday 26 February and Thursday 27 February 2025 (between 7pm-8:30pm);
- Pop-up exhibition open daily at Campbell & George Club in Queanbeyan from 10am-3am from 21 February to 16 March 2025. This comprised a detailed display with project information and plans, FAQs, amendments made to the applications, and other aspects of the proposal.
- The project team was made available to the community during the 'pop-up' exhibitions for clarification on matters of interest / concern and to provide opportunity for community members to view plans and details.
- Promotion of the public notification period on the QPRC planning website and on the proponents project website.
- QPRC was requested to deliver a reminder of the proponent initiated engagement on their facebook page
- Engagement between Vikings Club CEO and local businesses (Jerrabomberra Tavern, Aldi, Raiders Group).

The following is a summary of the responses received during the community engagement period both in terms of attendance at the 'pop-up' exhibition and emails / written responses received:

- A **total of 61 attendees** who registered at the exhibition. Note that it was not compulsory to register and a number of persons elected not to register;
- A **total of 188 submissions received in support** of the development: 136 emails providing unique reasons; 35 emails of support without providing a unique reasons; and 17 submissions in support of the development received via the project website;
- A total of **3 submissions objecting** to the development;

Qualitative feedback was recorded from attendees throughout the eight community drop-in sessions at the project exhibition. Exhibition feedback has been categorised into themes which reflect key areas of community interest. As well, a quantitative analysis of the supporting email submissions was undertaken. A total of 380 unique reasons giving for supporting the development were coded into thematic groups summarising what the community considers the key value propositions and benefits of the proposal.

A detailed summary of the matters that were raised during the exhibition period can be found within the community engagement summary at **Attachment A** and as incorporated in the final SIA, the table below provides a summary of these matters.

Theme	Community Feedback
4.1 Club Design and Amenity	<ul style="list-style-type: none"> Detailed questions about floor plan Architecture – pleasing Current shopping centre dated and this project will bring an aesthetically pleasing building to the community How big will the function rooms be? (explained capacity) Can we have a Men's Shed? (for future discussion)
4.1.2 Siting	<ul style="list-style-type: none"> Siting of building on the block - curious as to why the building was sited where it was on the block (explained restrictions around siting, setback, positioning of building) Why couldn't it be moved further away from houses? (explained restrictions around siting, setback, positioning of building) Question around scale (explained comparative potential building envelope used on other sites under their permissible uses) Accepting of bushfire reasons for club not being on the other boundary farther away from residences
4.1.3 Landscaping	<ul style="list-style-type: none"> Appreciation of how much landscaping and non-permeable surfaces would be retained, addition of trees and mature plantings well received Interest in landscaping Appreciation of the acoustic wall being offset from the boundary to allow for landscaping in front
4.2.1 New road off Henry Place	<ul style="list-style-type: none"> Questions around where the new road would go and road access (explained no entry at all off O'Sullivan/Esmond)
	<ul style="list-style-type: none"> Parking – numerous interest in understanding parking numbers and generally felt it was a good allowance Accessibility of entry (explained porte cochere) Drop off outside building was well regarded, plus noted no ramps or stairs – easy access, very accessible – popular amongst older residents Appreciation of large amount of carparking and availability – recognition as a result that no overflow parking will happen throughout the streets
4.2.3 Pedestrian Access from Esmond Avenue	<ul style="list-style-type: none"> Many residents living close by expressed a desire to have access to the club from Esmond Avenue to save them from having to travel all the way around to the front entrance Generally positive about project, however asked why there was no pedestrian pathway through the wall (acoustic barrier) and wanted a gateway through <p><i>“Why is there no pedestrian path to allow easier access for locals?”</i></p> <p><i>“Can we have a break or a crossover?”</i></p> There was concern expressed about closing off access with the wall (acoustic barrier), to the continuation of the wall, the increased height of the wall, as well as for the impact on residents of having pedestrian access off Esmond Avenue <p><i>“The only negative that the residents of Miles place and others around us felt is the wall being built, all of us want the pedestrian access to Aldi's etc to remain, and the area where the retail shops are going (behind Aldi's) to have no wall, we prefer having a view and airflow to our Street. When we moved into our street we had the scenic view of the original farm house and paddocks, and this was something we all treasure and would not like to lose, in fact we would rather have a view with the retail shops than a grey prison wall to look at, we also feel that people coming from the club would be no different to those coming from the Jerra Tavern, after 21 years I can honestly say that any noise has been minimal and not something that has impacted the street.” Miles Place Resident</i></p> <p><i>“Regarding the development of the Populars Club, and your regard to minimising the impact on the adjacent residential area, in particular Esmond Avenue, can I please appeal to this commitment by not putting pedestrian access to the club from Esmond Avenue. This is traditionally a quiet street and the impact of club</i></p>

	<i>patrons using this suburban street to access the Club can significantly affect the local community. Please note that there is already pedestrian access to Aldi which could also service your club without placing additional stress on the neighbourhood."</i>
4.3 Food, Beverage and Entertainment	<ul style="list-style-type: none"> • Questions about F&B choices • Not a drinker, liked the café, can get a meal there • know Vikings reputation for affordable F&B, will be enjoyable place to bring family which Jerra doesn't have, a family friendly place • Many do not consider the Jerrabomberra Tavern is attractive as a place to go either for the quality of F&B or the ambience
4.4 Family and Social Experience	<ul style="list-style-type: none"> • Considered potential good local place for families to connect • Seen as family friendly (Tavern is not) • Lots of people asked about and liked the play area for kids – praise for Vikings Erindale play area • A number were keen to ensure gaming couldn't be seen by children
4.5 Project Timing and Phasing	<ul style="list-style-type: none"> • Many asked when is it coming? • How long will the construction take? • Many eager to know how soon they will be able to use the club • Detailed questions about what stage 1 and 2 included
4.6 Vikings Reputation and Values	<ul style="list-style-type: none"> • Considerable recognition of Vikings history of community support and family friendly venues • Appreciation of Vikings' reputation for delivering good value service and supporting sports clubs
4.7 Economic benefits	<ul style="list-style-type: none"> • Job opportunities for employment in local area – good pathway for young people • Think club will improve area and real estate values will increase as a result
4.8 What's changed since last DA?	<ul style="list-style-type: none"> • Some interest in what had changed since the last DA particularly from people living nearby who were already aware of the project and key aspects of the development • Concerns expressed about the closing of the acoustic barrier to prevent pedestrian access from Esmond Avenue
4.9 Gaming and operations	<ul style="list-style-type: none"> • 3am closing time queried (corrected information to reflect the change to an earlier closing time of 2am with alcohol sales ceasing at 1am) • Several residents made the point that they were long term club goers but had never "played the pokies" – that's not why they go to the club • A few people expressed the tension between not wishing to have more gaming machines while at the same time understanding that this is the club operating model and how clubs are able to give back to their communities. <p><i>"I support the development of this club. I have reservations about the number of electronic gaming machines and would like to see the number in Phase 1 reduced further, noting they are a necessary mode of revenue generation. The benefits of establishing his club outweigh any concerns."</i> Email submission</p> <p><i>"We support the development of a new Vikings Club but our main concern is for the growth of gambling. Whilst we are not gamblers ourselves we are certainly not "wowsers". We would hope that the venue will not be flooded with poker machines. Personally I don't see the attraction of these machines, the old ones with the handle provided a much more interactive experience! The benefit to the community with more jobs is undeniable. This new club will be an excellent addition to the community."</i> Email submission</p> <ul style="list-style-type: none"> • Hesitations about gaming were typically part of a suite of mixed views held by residents about the development although in one email submission it was the only reason provided. <p><i>"We definitely need more places for people to empty their wallets into pokie machines. Too many children are being fed, too many bills are being paid in our area, and we need to change that by further inviting the scourge of gambling into the community."</i> Email submission</p>

4.10 Impact of The Poplars Club on Campbell & George operations	Several queries were made about what would happen to Campbell & George in relation to Vikings' new club. They had heard rumours such as Campbell & George would close and the gaming machine licences would be transferred to Poplars, that Campbell and George would be sold, that Campbell & George had already been sold to Warrigal. (Vikings and project team explained there was no truth to any of those rumours and that Vikings' investment in Campbell & George was for the long term and had transformed it into a tremendously successful club which it had no intention of selling).
4.11 Questioning of influence and vested interests	<p>The potential conflict of interest by opponents of the development was raised by several exhibition visitors. A number of visitors to the exhibition believed that there were potentially influential stakeholders who had close ties to other clubs and developers within the QPRC area who would likely see a new Vikings club as a competitive threat having a negative impact on their operations, and therefore had an interest in seeing Poplars not go ahead, or in a different location.</p> <p><i>"I support the proposed Poplars Club development because we are in dire need of facilities like this as an alternative for food, community gatherings and of course jobs. Just because members of the council and JRA are linked to groups like QLC doesn't mean the community should suffer the consequences."</i> Email submission</p>
4.12 Views on Jerrabomberra Residents' Association position	<ul style="list-style-type: none"> • Several residents who visited the project display described being advised by the JRA not to attend The Poplars Club public exhibition. • Some who had attended the JRA meeting the previous week expressed disagreement with the position taken by the JRA leadership against the proposed development as well as the tactics proposed by the JRA to oppose the development (such as their plan to invite Vikings to a public meeting then going to the media when they could not attend). • A number of people said they were disappointed with the tone and content of comments being made at that JRA meeting. <i>"I am a member of the JRA – I walked out of the last meeting because of the inflammatory language being used."</i> • One attendee said she was a regular club-goer and had been very offended by the disparaging characterisation from the JRA chair Margot Sachse of people who visit clubs as "cheap schnitty eaters". • Several people said they did not feel they could share their personal views supporting the club in JRA meetings as there was no room for any discussion other than strong views opposing The Poplars Club. • A former member of the executive of the JRA visited the exhibition and said he had previously been opposed to the project but that most of his concerns had been addressed in the changes made to the DA and that he would be making a submission to support the project. • Several expressed the view that the JRA was not representative of the community's views on the issue of the development. <i>"It is also disappointing to see the JRA committee oppose this development in a very unprofessional manner and they are not speaking for the majority of the local community. I am a member of the JRA and advise the JRA have not consulted or surveyed their members to understand the true support or opposition of this proposal, they've just continued to push an agenda to have the project aborted by trying to raise issues that are governed and managed by NSW Planning, Liquor and Gaming Licencing and the Local Council, not by what the JRA "thinks" should be allowed to operate in this precinct."</i> Email submission
4.13 Jerrabomberra Residents' Association (JRA)	<ul style="list-style-type: none"> • Vikings and the project team spent 75 minutes (7.15pm-8.30pm) at the project exhibition on 20 February 2025 with representatives from the Jerrabomberra Residents' Association including the chair Margot Sachse and spokesperson Robert Wilson. • Mr Wilson, on behalf of the JRA, raised five areas of concern. We have included these points and our response in Attachment A (see pages 15-16). • Ms Sachse (JRA chair) contended that the design had changed and the club was much bigger than originally indicated. The project team explained that this was not the case; the building footprint was the same and while the design was more detailed than early drafts, the scale had not changed. The scale is the same as indicated in the first consultation held with the JRA in April 2023.

	<ul style="list-style-type: none"> Additional feedback given by other JRA members on 20 February included: <ul style="list-style-type: none"> “I don’t want it on my doorstep - I live 300 metres away.” “Esmond Ave residents had a view for 30 years which will now be lost.” “Don’t understand why it can’t move. Take one message out of this, move it to Tomsitt Drive and we would support it.” “Not opposed to a club, just want it in a different location.” “The [QPRC] GM should resign. She’s deliberately and knowingly deceived us.” “Stupid KFC and Macca’s are there already, it’s ugly and disgusting and it’s now an industrial area.” We’ve had problems with the Tavern.” “I don’t agree with gaming machines and we don’t want them in Jerra.”
4.14 Sensitive Receivers	<p>Special attention was paid to feedback from nearby residents who visited the exhibition and had the opportunity to discuss the development with Vikings and the project team (either at the drop-in sessions or at any other time if they could not make any of the drop-in sessions). Feedback from residents who identified themselves as living in Esmond Avenue, O’Sullivan Road or Miles Place is outlined in detail below.</p> <p><i>“I think this will be okay as long as it is managed properly.” Miles Place Resident</i></p> <p><i>“I fully support the development of the proposed Vikings Poplars Club, and look forward to the benefits it will bring to the Jerrabomberra community. My feeling is that it will bring huge benefits to local sporting clubs and other community activity groups, as well as employment opportunities and an alternate leisure and dining venue, of which Jerrabomberra has very few options at the moment.</i></p> <p><i>After visiting the exhibition at the Campbell & George Club I was further encouraged by the details of the development. There is one aspect which I would like to suggest an improvement, however, and that is to do with pedestrian access. The development proposal indicates that there would not be any access to the site from Esmond Ave/O’Sullivan Rd, as a wall would be built all the way along that boundary. In consideration of risks associated with drink driving/drug driving, I think pedestrian access should be encouraged, not hindered. Why should nearby residents be asked to walk 400m (via Ferdinand & Henry) when the club is only 50m away? I do not think that is a logical restriction, and irresponsible from point-of-view of Council and the people who had been pushing such a thing. It is also contrary to the Council’s own development regulations for the Poplars Retail precinct:</i></p> <p><i>>>>10.7 Pedestrian Access and Mobility</i></p> <p><i>>>>d) The development shall provide continuous access paths of travel from all public roads and spaces as well as unimpeded internal access.</i></p> <p><i>All in all, my conclusion is that I fully support the establishment of the club. The suburb of Jerrabomberra has a population of about 9000 people, ample size to support a new club facility and dining establishment of this type. Please note: I live in O’Sullivan Road, about 50 metres from the proposed site. Any adverse matters would affect us more so than others who live further away --- and I have no issues about the club. I am looking forward to it going ahead, as soon as possible --- it is a development that is sorely needed for the community.” O’Sullivan Road Resident via email submission</i></p> <p><i>“I support the proposed Poplars Club development because I believe it to be in the best interest for the Majority of Residents in the Queanbeyan-Jerrabomberra area, I say this as one of those who will be more affected by the Club being built as I reside in 7 Miles Place Jerrabomberra, near where the Club will be built. The majority of people I have spoken to about the Club, Neighbours, Friends and others have only positive attitudes to the club being built and the overall opinion that it is a win win for the area and residency as there is limited places to go and enjoy with family and friends, and everyone I have spoken to also are excited by the Viking Clubs plans to give back to the community through sporting and other avenues and infrastructure. Even though in the short term while the building is going up there will be noise and dust levels, this will no different impact wise to when Aldi’s, MacDonalds, Kentucky, 7-11 service station and the currently being erected wellness centre produced while being built. The economic and</i></p>

	<p><i>benefits to the residents of Jerrabomberra in particular and to the Council can not be understated, and given all the financial and employment benefits the Vikings Club will bring to the area and to the council I am at a loss as are many others as to why the minority seems to have the councils ear when the facts are clear to see that the Vikings Club will bring such great benefits as I have just stated. There is a concern among many that the Council seems to be unduly influenced by the minority either through close association or an unwillingness to actually go and do due diligence by letter bombing all the residents letter boxes with both pro and cons of the club being built and with contact details either with email or text so that the council and the Vikings club receive a genuine consensus as to what the residents want as opposed to what self-invested parties will benefit from not having a club built. I will state that I do not hold any shares or positions of conflict that would colour my support for the club being built or not being built, I am simply a resident here (21 years) and once I looked through all the pro's and con's could only see a win win for the Jerrabomberra community as a whole."</i> Miles Place Resident via email submission</p> <p><i>"I live on Esmond Avenue and I don't care about the club, I just don't want the wall."</i> Esmond Avenue Resident</p>
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3. Amenity and Acoustic Impacts

Council on 28th February 2025 provided the outcomes of a further peer review undertaken by Day Design dated 26 February 2025 which considered the Acoustic Environment & Impact Assessment Report and Aircraft Noise Impact Assessment prepared by Acoustic Noise & Vibration Solutions, dated 3rd February 2025. The peer review concluded that the amended report had not adopted or addressed the criticisms in their previous review to properly consider the likely noise impacts from the proposal.

Acknowledging that consideration of noise impacts from the development is a key matter in protecting the amenity of adjoining residences, the proponent engaged a separate acoustic consultant to undertake a further acoustic assessment.

Acoustic Dynamics was ultimately engaged to prepare an Operational Noise Emissions Assessment (the Acoustic Assessment) dated 16 May 2025. Acoustic Dynamics undertook a new assessment of the application and the local conditions including conducting unattended noise monitoring at the development site to determine the existing noise environment and establish relevant noise criteria. Acoustic Dynamics conclude in their assessment that (our emphasis underlined):

Further to our site survey, noise monitoring and measurements, our review of the relevant acoustic criteria and requirements, and our calculations, Acoustic Dynamics advises that the proposal can be designed to comply with the relevant acoustic criteria of Queanbeyan-Palerang Regional Council, the NSW OLG, NSW EPA, POEO Act 1997 with the incorporation of our recommendations detailed within this report.

It is our opinion that the acoustic risks associated with the proposal can be adequately controlled and the amenity of neighbouring properties and residents can be satisfactorily protected.

The following is a summary of the key recommendations and design advice from Acoustic Dynamics that are to be implemented. The complete list of measures can be found at Section 5 of their report (**Attachment B**).

- Incorporate a 3m high barrier along the eastern and south eastern perimeter of the site;
- Install an acoustic landscape baffle (primary acoustic landscape baffle) within the landscaping directly to the north east of the bar pass-through.
- Barriers are to meet the requirements detailed in the Acoustic Assessment;
- Adopt a Plan of Management (PoM) incorporating best management practice procedures;
- Trading hours for the premises consistent with the hours that have been sought as part of the application;
- Operational measures including the limitation of the number of patrons within the outdoor areas which would be addressed through the PoM;
- All outdoor areas are to be limited to day and evening use only (i.e. no use after 10:00pm);
- All windows within the eastern façade of the building are to be closed where the capacity of the bistro reaches 25% (i.e. more than 53 patrons) or after 10:00pm, with the exception of the northern-most

and southern-most doors to the restaurant, and the pass-through to the bar which can remain open until 10:00pm;

- All windows to the upper ground function rooms are to be closed at all times;
- All windows and doors to the level 1 function room shall be closed at all times;
- Requirement for patrons and staff to leave the premises quietly and respectfully to minimise any potential impacts on the surrounding amenity and inclusion of appropriate signage;
- Training of staff with respect to the appropriate setup and pack-down procedures;
- Heavy vehicle movements and deliveries must be received during day-time operational hours only. Vehicles required to be on-site for longer than 5 minutes should have their engines switched off;
- Noise generating activities such as rubbish disposal and placing empty glass bottles in waste bins are to be conducted during day time trading hours only;
- Implementation of an appropriate community liaison procedure including a noise and vibration complaint procedure and means of ongoing communication with nearby potentially affected receivers;
- Operational and design measures with respect to any audio entertainment system including, however not limited to, music within the restaurant/bistro is to be limited to background music only; and all music within the function rooms is to cease no later than midnight;
- Minimum building construction requirements to ensure noise transmission is adequately controlled. Amended plans have included an air-lock system between the Level 1 function rooms and the terrace (see **Attachments B & C**);
- Façade walls to the pondside dining area (Stage 2) shall be full height to the extent depicted in the report (see **Attachment B**);
- Absorptive finishes are to be implemented within the internal and external dining areas, the function rooms, and function room terrace areas to reduce build-up of reverberant noise from patrons and music;
- At this stage of the proposal, Acoustic Dynamics understand the selection and location of specific items of mechanical plant have not yet been finalised. Acoustic Dynamics is satisfied that mechanical plant noise can be controlled by practical and standard mitigation measures as detailed in the report (see **Attachment B**);
- Certification and testing will be required of the building materials to be used in the development with respect to their intended use.

4. Site Suitability

Site suitability is a matter for consideration under Clause 4.15 of the *Environmental Planning and Assessment Act 1979*, requiring that a proposal is appropriate for its location.

There are a number of elements that combine to demonstrate site suitability which have been addressed in detail elsewhere in this response. In this case the key considerations are:

- a) Permissibility & land use compatibility (including alignment with strategic planning for the precinct);
- b) Amenity;
- c) Character in the context of the local centre; and
- d) Community integration and social value.

Those matters are considered below with respect to the proposed development

a) Permissibility & Land Use Compatibility

The starting point is the permissibility in the zone. For the purpose of the DA, the land use “*registered club*” is permissible in the E1 Local Centre zone. There are seven objectives in the E1 zone. Council in their assessment report notes that three are not applicable and the proposal is consistent with another three. The council assessment report considers the proposal is **partially** inconsistent with only one objective being:

To encourage development that is consistent with the character and amenity of the locality.

Council stated that the partial inconsistency is in relation to the desired future character of that part of the ‘locality’ zoned residential.

The desired future character of the area is captured in both the DCP and the NSW Government's South Jerrabomberra Regional Job Precinct Master Plan (March 2025), which identifies the local centre sub-precinct as a key community and commercial node intended to deliver a range of services for residents, workers, and visitors. The Master Plan states:

“The local centre will provide shops and retail uses, cafés, bars, and restaurants as well as wellbeing facilities for people living and working in the South Jerrabomberra precinct and surrounding areas.”

As an earlier mover, the proposal, with its dining, function, and recreational spaces, directly contributes to this intended land use mix, reinforcing the precinct's **“live, work, connect”** vision. The club will act as a community anchor within the local centre, providing amenities that are not currently available in the locality.

In addition to the objectives of the zone, the proposal satisfies the key planning controls:

- The proposal is within the 12m height limit under the LEP;
- The FSR on the site is 1:1. The proposed FSR is 0.18:1 (Stage 2); and
- The adjoining development plans for North Poplars include a mix of commercial buildings such as retail, fast food, and a supermarket (e.g. ALDI), which establish a commercial context at this interface.

The scale, height, and use of the Vikings Club is compatible with the existing and evolving built form. The use of materials and modulation in the architectural design also reflect a civic rather than industrial or bulky form, appropriate for the centre.

b) Amenity

Potential amenity impacts have been robustly addressed through design and operations, including:

- Generous separation from residential receivers. The site has been arranged to minimise the impact on the residential area to the east;
- An updated Operational Noise Emissions Assessment confirms compliance with the Noise Policy for Industry and Council's own standards and other relevant criteria subject to the recommended acoustic mitigation and operational measures (see **Attachment B** and section 3 of this letter);
- Revised hours of operation, particularly for function rooms;
- A detailed Alcohol Plan of Management to address concerns raised by NSW Police; and
- No vehicular or pedestrian access is proposed from the adjoining residential street network, limiting traffic or noise infiltration into the neighbourhood.

In this context, amenity is actively protected and mitigated, consistent with good planning practice and the expectations of a transitional zone between commercial and residential land uses.

c) Character in the Context of the Local Centre

Council has raised concerns that the proposal does not adequately demonstrate consistency with the character and amenity of the residential interface. The definition of 'character' must be considered in terms of both existing and desired future character.

The site is within an evolving local centre. The DCP, Master Plan and supporting structure plan identify this area as a mixed-use node, anchored by civic, retail, food, and social infrastructure.

The adjoining development within the North Poplars precinct includes a supermarket, service station and retail food and drink premises. Future commercial development is anticipated within the E1 zone adjoining the residential area to the east consistent with the vision, planning controls and evolving character of the area.

The proposal in this context is not an anomaly, but rather an essential land use that reinforces the planned function of the precinct as a community hub.

d) Community Integration and Social Value

The club is not a 'destination venue' for external patrons, rather it has been designed for and by the community, with:

- Over 12,000 existing members in the Queanbeyan–Jerrabomberra area;
- A focus on social programs, sport, family dining, and community function rooms;
- Provision of employment, training and procurement opportunities for local residents and businesses.

The Social Impact Assessment (SIA) finds that associated risks (e.g. alcohol, gaming) are low-moderate and mitigated by comprehensive management plans and passive surveillance measures. The existing presence of the Vikings Group and their community outreach are evident as detailed in section 1 of this letter.

Summary

The proposal is demonstrably suitable for the subject site having regard to:

- Permissibility and built form under the relevant objectives and planning control for the E1 zone;
- Compatible with the character of the evolving local centre;
- Effective mitigation of amenity impacts at the residential interface;
- Clear social and economic value to the local community.

The proposed development is consistent with both the existing and emerging character of the locality and supports the zone objective to encourage development that is '*consistent with the character and amenity of the locality.*'

5. DA Assessment Timeline

Council in their planning report has provided a summary of the applicant's timeline for the assessment of the application which ends January 2025. Obviously, the project team has been working diligently including engaging with Council at the appropriate times to resolve the outstanding matters. We provide below an expanded timeline with the additional activities in green to differentiate from those already detailed in Council's report.

Who	Key Event	Date
Applicant	DA submitted on Planning Portal	21.12.23
Council	DA lodged with Council	25.1.24
Council	First Exhibition	6.3.24 – 22.3.24
Council	Extended Notification	3.4.24 – 19.4.24
Council	Redacted submissions issued to applicant	6.5.24
Applicant/ Council	Presentation to Councillors on the DA	23.5.24
Council	Email confirming change in assessing office	25.6.24
Council	Request for information (RFI) letter from Council	27.6.24
Planning Panel	Site Inspection, Public Briefing & Applicant Briefing	17.7.24
Applicant	Response to Submissions submitted to Council	18.7.24
Applicant	Additional information and amendments submitted to Council	6.9.24
Council	Renotification – 23 submissions received	26.9.24-15.10.24
Council	Redacted submissions issued to applicant	27.11.24
Applicant	Requested meeting with Council staff	3.12.24

Applicant	Response to Submissions submitted to Council	10.12.24
Planning Panel	Assessment briefing	17.12.24
Applicant/Council	Meeting with Council to discuss issues raised in report to Panel	20.12.25
Applicant/Council	Meeting with Council to provide update on amended documentation	24.1.24
Applicant	Lodgement of additional documentation to the Portal. Email to Council confirming lodgement	3.2.25
Applicant	Email to Council detailing the community engagement and strategy to be undertaken	7.2.25
Council	Email from Council confirming notification timing and acknowledgment of engagement strategy	7.2.25
Applicant/Proponent	Email to Council with further detail / dates of the community engagement and strategy. This included details of the venue and offer to meet to further detail the engagement process and coordination with Council's own process	13.2.25
Council	Email from Council confirming that Councillors have been made aware of the letter box drop and the community sessions. Acknowledge the desire to coordinate with Council's own communications team and request for any material used during the engagement process to be made available Did not see the need to meet at the time	13.2.25
Applicant	Email to Council, confirming that a detailed engagement report would be prepared including the material requested by Council	17.2.25
Applicant	Email to Council. Provided copy of the FAQs and the letter box drop for Tier 1 residents. Confirmation of the exhibition dates and times. Request for Council's comms team to update their Facebook page advising of further exhibition dates	20.2.25
Council	Email from Council confirming that the request to update notification has been received and issued to comms team.	21.2.25
Applicant	Email to Council (and phone call) with a photo of the exhibition set up.	21.2.25
Applicant	Email to Council providing an update on the exhibition. Request to further update Council's Facebook page to remind the public of the final exhibition dates.	26.2.25
Applicant	Email to Council requesting an update on Planning Panel briefing.	4.3.25
Council	Email from Council confirming no update on briefing – confirmation that the RJPP was updated on the further material submitted, notification period and the proponent initiated engagement.	4.3.25
Applicant	Email to Council with an update on the exhibition process.	14.3.25
Council	Email from Council acknowledging update.	14.3.25
Council	Email from Council seeking clarification on the set of current plans.	18.3.25
Applicant	Email response to Council detailing the plans submitted.	20.3.25
Council	Email confirmation that no further action is needed regarding the plans.	25.3.25
Applicant	Email update to Council that a further acoustic consultant had been engaged in response to the most recent peer review by Council's expert. That this work was underway and would include additional background noise logging.	20.3.25
Council	Council issued set of redacted submissions.	28.3.25
Applicant	Email to Council requesting a meeting to discuss status of DA and questions regarding the submissions. Noted that the	2.4.25

	email submissions received during our own notification period were not included and that submissions in support appeared to be missing.	
Council	Email from Director confirming no capacity to meet but to engage with Manager / assessing officer.	2.4.25
Applicant	Phone call with Council to question why email submissions did not form part of the redacted submissions provided to applicant. Confirmed that while they did not include the necessary political disclosures form but that they would still be considered by Council as part of their assessment and report.	2.4.25
Applicant	Email to Council confirming phone call. Confirmed that the redacted submissions did not include at least 2 written submissions received in support of the application that the applicant was made aware of. Requested confirmation of the approach to consideration of email submissions received originating from the proponent initiated engagement. <i>Note: no response received from Council</i>	2.4.25
Applicant	Email to Council requesting follow up to email dated 2.4.25. <i>Note: no response received from Council</i>	8.4.25
Council	Email with a copy of the complete set of submissions received. From a review this included two (2) additional submissions in support that did not form part of the previous set issued on 28.3.25.	11.4.25
Applicant	Email to Council requesting copy of the South Jerrabomberra Regional Jobs Precinct Masterplan as adopted	14.4.25
Applicant	Email to Council with respect to update on the imminence of the amended acoustic report and summary of the minor changes to the mitigation measures.	14.5.25
Applicant	Submission of amended acoustic report; summary of community engagement outcomes; and amended plans submitted via the Planning Portal and to the Panel Secretariat.	16.5.25

Conclusion

In summary, we believe the issues raised in the Council report have been satisfactorily addressed and that there is no basis for concluding that the site is not suitable for the development. That the Panel can be satisfied that threshold matters have been resolved on the basis of the additional documentation submitted.

We thank the Panel for its consideration of the above matters.

Kind regards,



Mark Grayson
Associate Director
Knight Frank Town Planning