



**CONSERVATION
COUNCIL** ACT REGION

Submission to the ACT Planning Authority

Draft Major Plan Amendment DPA-08 – Thoroughbred Park Precinct

October 2025

About the Conservation Council ACT Region

The Conservation Council ACT Region is the leading environmental advocacy organisation and hub for community groups in Canberra. Our mission is to protect nature and create a safe climate in the ACT and region.

Since 1981 we have been at the centre of the region's most important wins for wildlife, bushland and communities, encompassing over 40 member groups.

We are a non-profit, non-government organisation that runs campaigns, promotes and upskills local groups, undertakes research, advocates passionately, and engages and informs our community.

Our belief is in the power of collective action to create change.

For further information please contact:

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I. Overview and General Position

The Conservation Council ACT Region supports the Draft Major Plan Amendment DPA-08 – Draft Plan Amendment 08 – Thoroughbred Park Precinct. We believe this proposal aligns with the goals of the ACT Planning Strategy by facilitating greater urban densification within existing serviced areas, particularly along high-capacity public transport corridors such as Flemington Road, The Federal Highway, Barton Highway and Northbourne Avenue. In saying this, we

believe this project would be better served in a way that does not benefit the horse racing industry, which causes harm both to animals and our broader community.

Increased density in well-located inner suburbs is a key measure to limit urban sprawl, which continues to fragment native habitats, increase transport emissions, and impose greater costs on infrastructure and services. Compact urban form enables a more sustainable, lower cost and a more liveable Canberra.

Our organisation has long supported policies that encourage greater density and sustainable infill, as outlined in our recent submission on the Draft Missing Middle Policy. We commend the ACT Government for progressing further densification in our city.

2. Horse Racing, animal welfare, gambling and associated harm

The Conservation Council urges the Territory Planning Authority to prioritise animal welfare and acknowledge the harmful social impacts of the gambling industry on Canberra's community. The ACT Government should not allow a toxic industry to profit from the proposed urban development through endorsing the retention of the racecourse in the District Strategy of the Draft Major Plan Amendment 08.

The Conservation Council notes that the future Thoroughbred Park Masterplan emphasises horse racing as a significant part of future planning in retaining 60% of the area for racing operations. This allocation significantly limits opportunities for socially and environmentally sustainable, climate resilient modern urban development that could better serve Canberra's growing population and environmental goals.

Furthermore, the Masterplan promotes future commercial ventures rooted in Canberra's sporting heritage—particularly horse racing—without adequately addressing the ethical and social concerns tied to the industry. The Conservation Council asks the ACT Planning Authority to reconsider its support of the Canberra Racing Club and to consider the following facts in its decision-making process.

The RSPCA knowledge base ¹ provides an overview on animal welfare concerns in thoroughbred horse racing. The main concerns include but are not limited to:

- 1) Oversupply of racehorses and associated welfare of these animals.
- 2) Use of painful devices, causing significant pain and long-term distress when associated with other cues.
- 3) Risk of injury and death and consequently euthanasia of often very young animals;
- 4) Administration of banned substances (doping) to e.g. mask pain and therefore suppress protective physiological mechanisms in the animal's body.
- 5) Racing of immature horses, leading to trauma and injury.
- 6) There are no mandatory welfare standards for racehorses. Therefore, legal protection is limited to the minimal requirements under state based animal welfare legislation.

¹ RSPCA Knowledge Base

<https://kb.rspca.org.au/knowledge-base/what-are-the-animal-welfare-issues-with-thoroughbred-horse-racing/>

- 7) Lack of enforceable standards. There are no mandatory welfare standards for racehorses. Therefore, legal protection is limited to the minimal requirements under State based animal welfare legislation.
- 8) Inadequate regulation of the industry which governs itself without enforceable standards, supporting the continuation of significant welfare issues to remain undetected.
- 9) Lack of industry transparency. It is essential that the racing industry collate and publish relevant data that affect the welfare of horses. Too little is known about the true nature and extent of injuries and deaths of horses which in turn affects the 'wastage' rate and fate of racehorses.

The Coalition for the Protection of Racehorses published its Annual Deathwatch Report ² in October and found that 2024-2025 was the deadliest season for racehorses on record. On average at least one horse died every 2 days. In the 2024/25 racing year, the report states a confirmed 50 racehorse deaths in NSW/ACT that were directly related to their use in racing. The report also states that the true number of racehorses who are euthanised/killed as a direct result of racing, is far in excess of that which can be determined from information available to the public.

Thoroughbred horse racing is a major part of the gambling industry. Betting is one of the primary economic drivers of horse racing. The ACT Gambling and Racing Commission ³ recognises gambling as a risky activity that can harm anyone, affecting not only the gambling individuals themselves but their families and communities. Gambling has been associated with domestic violence. The ACT Gambling Survey ⁴ on gambling, conducted by CQUniversity's Experimental Gambling Research Laboratory and commissioned and funded by the ACT Gambling and Racing Commission, found that around one in six ACT adults, approximately 58,000 people, experience some harm from gambling. Evidence shows that domestic violence is associated with gambling and in particular race betting ^{5 6 7}.

3. Ensuring Integration with Public Transport Infrastructure

The proposed rezoning will enable higher-density development in proximity to the light rail corridor, one of the Territory's most significant public transport corridors. To maximise the sustainability benefits of this increased density, the Conservation Council recommends that the

² Death Watch Report 2025

(https://horseracingkills.com/wp-content/uploads/2025/10/DeathWatch_2025_28_Oct_2025.pdf)

³ ACT Gambling and Racing Commission (<https://www.gamblingandracing.act.gov.au/>)

⁴ The ACT Gambling Survey

(<https://www.cqu.edu.au/news/1218940/survey-reveals-about-one-in-six-act-adults-experience-harm-due-to-gambling>)

⁵ <https://www.relationshipsnsw.org.au/blog/gambling-domestic-family-violence/>

⁶

<https://aifs.gov.au/research/commissioned-reports/relationship-between-gambling-and-domestic-violence-against-women>

⁷<https://aifs.gov.au/research/research-snapshots/race-betting-australia>

ACT Government further investigate the impacts of additional population density on light rail patronage and capacity.

In particular, we recommend that the ACT Government and Transport Canberra consider:

- Increasing light rail service frequency during peak periods, as well as inter-peak times.
- Adding additional carriages to current light rail vehicles to increase capacity.
- Lengthening existing light rail stops where necessary to accommodate longer vehicles.

Such proactive planning will ensure Thoroughbred Park remains well served by high-quality, efficient, and comfortable public transport, thereby reinforcing mode shift away from private vehicle use.

4. Prioritising Active Travel Connectivity and Safety

Higher residential densities must be supported by high-quality, accessible active travel infrastructure. This will take the pressure off both public transport services and roads. We strongly recommend that DPA-08 implementation be accompanied by an upgrade to active travel infrastructure in the surrounding area.

Priority should be given to:

- Making active and public transport be and feel more convenient and attractive than, and at least as safe, as driving. This needs to be achieved by both routes and infrastructure (design and dimensions for visual signals, traffic controls, visual signal and amenity, shelter from weather and noise). Safe, prioritised, direct and attractive active travel connections are needed within the precinct (servicing residential and commercial developments in it) and between it and light rail stops, other public transport in the area, and nearby suburbs and Civic. PRZ1 should be continuous along the Federal Highway frontage, and paths within it given priority over any motor vehicle driveways or streets crossing them. The Federal and Barton Highways, Flemington and Racecourse Roads, and Ellenborough/Mouat Street are all currently hostile environments to people not inside motor vehicles. People walking and riding on Flemington Road (including to the light rail stops) need vegetation and other shelter from sun, wind and noise; extending the strip of PRZ1 to run along the Flemington Road frontage may help.
- Separated, prioritised and high capacity, walking and cycling paths along Flemington Road, the Federal and Barton Highways and Northbourne Avenue, providing safe routes for people walking and riding into Dickson, Gungahlin, the City Centre and surrounding suburbs. Of particular importance here is a safe, direct, cycling link that ensures new residents of these developments have the option to ride their bikes safely into the city (an option that is currently unavailable). We would be open to discussion about how this can best be achieved, but believe the Government should not shy away from the potential of reducing Northbourne Avenue to two lanes of traffic, which would supply sufficient space for a signature piece of cycling infrastructure: a car-lane wide protected bike lane along Northbourne Ave that would truly indicate the ACT takes cycling seriously as a mode of transport.

- Upgrading infrastructure along side streets in the neighbouring areas, such as Antill Street, Swinden Street, Sanford Street, Mouat Street and Phillip Avenue, amongst others, to create better connections between Thoroughbred Park precinct and nearby neighbourhoods such as Mitchell, Dickson, Downer, Lyneham and Watson, including the local shops, schools and recreation facilities. Active travel infrastructure along these routes are in particularly poor condition, which will limit movement between these new apartments/townhouses and local shops, schools and recreation facilities. Fixing this infrastructure will improve connectivity to local destinations, reduce reliance on private cars and boost business to local shops.

Investment in active travel infrastructure will help reduce car dependency, lower living costs, reduce emissions, and create a healthier, more vibrant community.

5. Provision of services

Given the significant number of houses being proposed to be built in this area, we are concerned that there may be a lack of relevant services and public places for this community. We therefore call on the ACT Government to ensure relevant services are provided to the community, including:

- Constructing appropriate educational infrastructure, including potential constructing a new school;
- Re-naturalising Sullivan’s Creek and building public parks;
- Ensuring this new area has adequate public space, including, potentially, a public square, community spaces, space for markets, and community facilities sport and recreation, and
- Creating adequate spaces for shops, restaurants, retail and commercial offices

6. Energy Infrastructure and Resilience

As Canberra transitions towards electrification and net zero greenhouse gas emissions, it is critical that new urban infill developments are supported by adequate electricity infrastructure. We note that in some existing infill areas, high demand from electric heating, cooling, and vehicle charging has caused brownouts and localised grid strain. (for example: [Record demand for electricity brings power outages as winter demand skyrockets - ABC News⁸](https://www.abc.net.au/news/2025-08-04/record-power-outages-canberra-winter-demand-skyrockets/105608798))

We therefore recommend that the ACT Government and Evoenergy undertake a proactive grid capacity assessment for the Northern Gateway precinct to ensure that the increased residential density can be supported without compromising energy reliability.

We also encourage the Amendment to build on Objectives agreed for the Canberra Brickworks Development by including as objectives and/or assessment criteria zero (or negative) net (i). Greenhouse gas emissions (including contributing to the ACT’s self-sufficiency in renewable

⁸<https://www.abc.net.au/news/2025-08-04/record-power-outages-canberra-winter-demand-skyrockets/105608798>

energy and not providing any infrastructure for use of fossil gas as a fuel), (ii). Pollutants, (iii). Nutrients, (iv). Water, and (v). Waste

7. Water and Biodiversity Management

This proposed development is located in a site that could produce unintended consequences for the Sullivan's Creek Catchment, Inner North residential and commercial areas and Lake Burley Griffin if not carefully managed. In particular, we recommend that the design incorporate the sound recommendations contained in the ACT Waterways Management Strategy, with a particular focus on on-site stormwater management, minimising nutrients leaving the site and minimising potential contributions to downstream overland flooding during extreme weather events. Site proponents should also invest funds to renaturalise Sullivan's Creek in the location.

Edge effects related to increased pollution by inappropriately disposed rubbish as well as non-contained pets such as cats also need to be considered due to the proximity to a large remnant of critically endangered Natural Temperate Grassland threatened ecological community in the Crace Grasslands Nature Reserve.

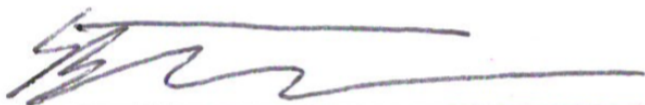
7. Conclusion

The Conservation Council ACT Region supports DPA-08 as a positive step towards creating a more compact, sustainable, and climate-resilient Canberra. However, we believe the Territory Planning Authority needs to prioritise animal welfare and acknowledge the harmful social impacts of the gambling industry on Canberra's community. We encourage the ACT Planning Authority to adequately address the ethical and social concerns tied to the racing industry in their decision making process.

We also encourage the ACT Planning Authority alongside other parts of the ACT Government, ensure the amendment is implemented alongside the investment in public transport capacity, active travel infrastructure, energy resilience and water and biodiversity management, ensuring that the Thoroughbred Park Precinct becomes a model of sustainable urban development.

We would welcome the opportunity to discuss this submission further or participate in future consultations relating to implementation planning.

Signed,



Simon Copland
Conservation Council Executive Director