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29 June 2026

The Development Assessment Panel
Tasmanian Planning Commission
GPO Box 1691
HOBART TAS 7001

By email only: tpc@planning.tas.gov.au

Dear Panel,

Representation – Kangaroo Bay Hotel Major Project

[REDACTED]

We object to the proposal on the basis that it does not satisfy Assessment Criterion 1.3 relating to built form.

Specifically, we do not consider that the proposed development achieves a scale and height appropriate to the existing or desired future character of the surrounding area and landscape setting.

Relevantly, Criterion 1.3 provides that:

The design of the proposed development is to achieve a scale and height appropriate to the existing or desired future character of the surrounding area and landscape setting.

Further, the criterion requires that the scale, height and architectural design of the proposed development:

- (a) allow for a visual connection with the timtumili minanya/River Derwent and kunanyi/Mount Wellington; and*
- (b) respond and relate to the waterside location and maritime activities, being reflected in the colours and materials of the built and spatial form; to an acceptable level.*

The proposed scale and height are not compatible with the existing character of the surrounding area

The supporting information submitted by the proponent, particularly the Visual Impact Assessment Report, demonstrates that the existing character of Kangaroo Bay is predominantly residential in nature.

The Visual Impact Assessment Report identifies that the predominant built form visible within the contextual setting of Kangaroo Bay comprises residential dwellings. We agree with this characterisation. The surrounding area, when viewed from the foreshore, adjoining residential areas and public vantage points, is overwhelmingly characterised by low-rise residential development, open water views and visual connections to timtumili minanya/River Derwent and kunanyi/Mount Wellington.

In this context, a hotel building of the scale proposed is fundamentally different in form, bulk and visual presence from the prevailing residential character.

The photomontages contained within the Visual Impact Assessment demonstrate that the proposed development would become the dominant built form within many views of Kangaroo Bay. Rather than complementing the established residential setting, the proposal would introduce a building of substantially greater scale and mass than that which presently defines the character of the precinct.

Accordingly, we submit that the proposal is not compatible in height, form or scale with the existing spatial and built form of the surrounding area and therefore does not satisfy Criterion 1.3.

The proposal does not adequately maintain visual connections with timtumili minanya/River Derwent and kunanyi/Mount Wellington

Criterion 1.3(a) requires that the scale, height and architectural design of the proposal allow for a visual connection with the timtumili minanya/River Derwent and kunanyi/Mount Wellington.

The Visual Impact Assessment itself demonstrates that the proposal would substantially impede these important visual connections.

Across the viewpoints assessed within the Visual Impact Assessment, the average visual sensitivity score is 2.8. Given that a sensitivity score of 3 is categorised as 'high' within the report's Visual Sensitivity Rating framework, this average indicates that the proposal generates consistently medium-high visual impacts across the study area.

Of particular concern is [REDACTED] which records a Visual Sensitivity Rating of 3.4. [REDACTED], we consider that the photomontages accurately demonstrate the significant loss of visual amenity that would result from the proposal.

These views are a defining element of the character and amenity of the locality. The proposal would replace open and expansive landscape views with a visually dominant built form, contrary to Criterion 1.3(a).

The proposal also fails to provide an acceptable level of visual transparency and permeability, as contemplated by Criterion 1.3.

The Visual Impact Assessment does not adequately substantiate claims regarding comparable built form

The author of the Visual Impact Assessment concludes that the proposed development 'is of a scale and height that complements and is consistent with a number of other larger built forms within the contextual setting of Kangaroo Bay.'

We dispute this conclusion.

The report provides no direct visual comparison, measured analysis or comparative photomontages demonstrating that the proposed hotel is genuinely comparable in scale, bulk or visual prominence to nearby buildings.

In our view, the nearby buildings referred to in the report are not comparable in terms of their overall height, bulk, massing or visual dominance, nor are they comparable in the context of their siting within the Kangaroo Bay precinct.

Given the acknowledged predominance of residential development within the visual catchment, and the absence of detailed comparative analysis, insufficient evidence has been provided to support the conclusion that the proposed development is appropriate in scale and height.

Limited engagement with directly affected residents

[REDACTED]

[REDACTED], at no stage has the proponent sought to engage with or consult us regarding the proposal, the potential impacts on our property, or possible measures to mitigate those impacts.

Given the acknowledged high visual sensitivity [REDACTED] and the significant impacts identified on views to timtumili minanya/River Derwent and kunanyi/Mount Wellington, it is disappointing that no genuine attempts have been made to understand the concerns of those residents who will experience the most substantial changes to visual amenity.

The absence of consultation with immediately affected landowners raises questions as to whether the proposal has been sufficiently informed by, or is genuinely responsive to, the existing residential character and amenity of the surrounding area.

Meaningful engagement with directly affected residents would likely have highlighted the importance of maintaining visual connections and may have led to consideration of alternative building heights, massing or design responses better suited to the locality.

Scope of this representation

The Major Project Impact Statement and supporting technical documentation comprise an extensive body of material. Given the volume and complexity of the information provided, we have not had sufficient opportunity to comprehensively review all aspects of the proposal or to form a concluded view as to whether all other assessment criteria have been adequately addressed.

Accordingly, this representation is confined to matters arising under Criterion 1.3 – Built Form and Architectural Design, being the issues of greatest relevance to our property and amenity. Nothing in this representation should be taken as indicating support for, or acceptance of, any other aspect of the proposal, and we reserve our position in relation to all other assessment criteria and matters raised by the Major Project Impact Statement and supporting documents.

Conclusion

The evidence contained within the proponent's own Visual Impact Assessment demonstrates that:

- (a) the prevailing character of the surrounding area is predominantly residential;
- (b) the proposed hotel would introduce a building of substantially greater scale and bulk than the existing built form;
- (c) the proposal would significantly impede visual connections to timtumili minanya/River Derwent and kunanyi/Mount Wellington;
- (d) the visual impacts are consistently medium-high across many viewpoints, [REDACTED];
- (e) the proposal does not provide an acceptable degree of visual transparency and permeability; and
- (f) the conclusion that the proposal is comparable to other nearby built forms has not been adequately substantiated.

For these reasons, we submit that the proposal does not satisfy Criterion 1.3 and should not be approved in its current form.

Kind regards,

Bradley & Emma [REDACTED]