

From: [Phil Gartrell](#)
To: [TPC Enquiry](#)
Subject: Kangaroo Bay - Major Project Submission
Date: Monday, 27 July 2026 5:59:22 PM
Attachments: [Kangaroo Bay - Response to Representations.pdf](#)

Good afternoon,

Please find attached a supplementary submission prepared by Chambroad Australia. This submission has been prepared in response to matters raised in the representations, following the public exhibition of the Major Project.

The submission includes the following attachments:

- Attachment A - TFS Response
- Attachment B - Clarence City Council Response (technical matters - Pitt&Sherry)
- Attachment C - Clarence City Council Response (technical matters - Marine Solutions)
- Attachment D - Tasmanian Aboriginal Heritage Council Response (REALM, Jenname & Milangkani Projects)

Kind regards,

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Kangaroo Bay Hotel Major Project

Response to Representations



Chambroad Overseas
Investment Australia Pty Ltd

27 July 2026

Acknowledgement of Country

Chambroad Australia acknowledges the traditional custodians of the lands on which we live and work today. We pay respect to elders both past and present, as well as to all other Aboriginal and Torres Strait Islander peoples.

Chambroad Australia commits to undertaking meaningful engagement with Aboriginal individuals and organisations to support the protection of country and culture, and the development of their aspirations.

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1. Introduction

This submission has been prepared by Chambroad Australia with assistance from Ireneinc Planning & Urban Design, in response to matters raised in the public submissions.

The submission is also informed by supporting advice from expert consultants.

2. Response to State Agencies / Council Representations

The following sections respond to matters raised by the Tasmania Fire Service, Clarence City Council, the Tasmanian Aboriginal Heritage Council and Building Tasmania.

1.1 Representation no. 4 – Tasmania Fire Service

The Tasmania Fire Service (TFS) have raised several technical matters regarding the ability for firefighting appliances to access the building (particularly the waterfront aspect), in the event of an emergency.

Matter(s) raised

The key matters raised by the TFS have been reproduced below:

Tasmania Fire Service (TFS) has reviewed the proposed Kangaroo Bay Hotel development and the associated assessment criteria. From an emergency management and incident response perspective, TFS provides the following matters for consideration during the planning and design phases of the project:

- *The hotel may incorporate sections of façade with full waterfront exposure, potentially restricting firefighting access, particularly for aerial appliances. Where access limitations exist, consideration may need to be given to enhanced fire safety measures and systems within the building.*
- *The design should demonstrate how firefighting aerial appliances will be able to access the building to undertake rescue and firefighting operations, including the provision of suitable hardstand areas where access may be required over wharf or open-water structures.*
- *The capacity and capability of the water supply infrastructure should be sufficient to provide the required flows and pressures for the simultaneous operation of all installed fire protection systems, including firefighting water supplies, across all design scenarios.*
- *Consideration should be given to how emergency services may access a static water supply source, such as the Derwent River (close to the site), as a supplementary firefighting water supply in the event of an emergency.*
- *The design should provide suitable access for emergency service vehicles to critical firefighting infrastructure, including hydrants, sprinkler booster assemblies, and other fire service connections.*

Response

Chambroad Australia acknowledges the matters raised by the Tasmania Fire Service.

Whilst none of the matters identified are anticipated to be beyond resolution during detailed design, further advice has been prepared by Neuron Build to assist further discussions during the upcoming Hearings.

This advice is provided in **Attachment A**.

2.1 Representation no. 21 – City of Clarence

The Clarence City Council's submission raises various matters, with a particular focus on the technical reports submitted in support of the MPIS. These matters were also raised in an earlier submission by the Council, in April 2026.

The representation submitted by Chambroad Australia (Representation no. 18) addresses a number of these technical matters, including supporting expert analysis and information. The representation also responds to additional matters raised by the Panel.

This submission provides additional responses to matters raised by the Council.

Additional supporting responses prepared by Pitt & Sherry and Marine Solutions can be found in **Attachment B** and **Attachment C**, to this submission.

Matter(s) raised

The key matters raised by Council are reproduced below.

Interest in Major Project Site

"...The site plan does not align the access to the Bellerive Yacht Club with the Right of Carriageway "E" on Lot 11 and appears to shift it to the west and locates carparking, loading areas and overhead supporting structures within this area which will fundamentally interfere with Right of Carriageway.

Response

The 'Right-of-Carriageway E' on Lot 11 is approximately 8m wide and variable width. The Lot itself has a minimum width of approximately 14.7m.

The proposed pedestrian bridge to Cambridge Road extends over a portion of the right-of-carriageway. The submitted MPIS and accompanying architectural plans demonstrate that a vertical clearance of 4.6m is achieved below the bridge, which is sufficient to accommodate boat trailers (confirmed through consultation with Bellerive Yacht Club), commercial vehicles (waste / deliveries) and firefighting (aerial) appliances. This arrangement does not impose any unreasonable access restrictions on the right-of-carriageway.

As shown in the submitted Architectural Ground Floor Plan (rev. Q) and car parking layout, the design incorporates a pedestrian footpath and publicly accessible car parking spaces either side of a 6.5m wide access aisle – providing a total width of 15.6m (approx.).

The submitted plans and TIA confirm these arrangements are sufficient to provide appropriate public vehicular and pedestrian access through the project site. As stated in the MPIS

submission, the spatial alignment of the existing right-of-carriageway will likely require adjustment to align with the physical extent of the proposed accessway.

Matter(s) raised

“...The proposed boardwalk (and public access) does not align with the Right of Carriageway “C” on Lot 8.

“...In addition, the cut for the lower carpark and the location of the Plant Room adjacent to Cambridge Road appear to ignore the drainage easement “D” on Lot 7.”

Response

The surveyed title boundary (Lot 8) protrudes beyond the landward extent of the Site in several locations, and as the Right-of-Carriageway (marked “C” on the Plan) follows the boundary line, it too extends over water in some locations, and is not currently, nor has it previously been trafficable.

The proposed waterfront boardwalk and shared pathway has been designed to cantilever beyond the existing rock seawall in several locations. However, the majority remains within the landward extent of the site. To accurately follow the spatial extent of existing the right-of-carriageway, the pathway would be required to extend farther out into the bay, necessitating supporting structures within the river.

In this instance, adjusting the spatial extent of the right-of-carriageway is the most logical and straightforward method to address the anomaly and ensure the spatial extent appropriately aligns with the physical extent of the pathway.

With regard to the drainage easement “D” on Lot 7, stormwater and overland flow occurring within this area will be directed to the proposed on-site stormwater system.

Matter(s) raised

“...Council does not consent to any relocation or change to its easement and rights of carriageways. It is noted that any approvals necessary to modify easements, or relocate stormwater infrastructure are not project-related approvals under project associated Acts. These are also matters that cannot be imposed by condition – in particular, the Panel cannot compel a third party to agree to any change. Accordingly, without such consents the proposal is unable to be brought into effect.”

Response

The Council’s position regarding the process for relocating or changing easements and rights of-carriageway is noted.

These are considered to be procedural in nature and can be appropriately addressed during the upcoming hearings.

Matter(s) raised

Subdivision and consolidation of lots

“The declaration of the Major Project did not identify that the project included the subdivision or consolidation of lots despite section 60Q(1)(d)(ii) of LUPAA which requires that such a declaration must include ‘the proposed uses or developments that are proposed to occur in relation to the project.’”

“...Accordingly, as development, to enable the Panel to consider consolidation of lots, it should have been identified as part of the declaration. It is not a subsequent activity which can be rectified through condition or assessment guidelines.

While we note that Appendix A of the Assessment Guidelines request this information, this is in excess of the project declaration.”

...

“In addition, it is noted that the provisions of section 60S of LUPAA prevent the planning authority from issuing a normal permit for development (such as consolidation) outside the provisions of the Major Project.”

Response

The matters raised by Council above relate to the major project declaration and broader legislative assessment process and are considered procedural matters, to be discussed at the upcoming hearings.

It is noted that the joining of one or more existing lots to form a single lot (consolidation), does not generally involve any physical works or alterations to the land. When forming part of a broader application for development assessed outside the Major Project provisions, it is not uncommon for consolidation to be considered subservient to the broader or primary development proposed.

Notwithstanding, the matters regarding the major project declaration and subsequent provisions of section 60S, are subject to interpretation. As these are predominately legislative and procedural matters, they can be addressed (as appropriate) during the subsequent hearings.

Matter(s) raised

Cambridge Road

We note that the proposal intends to provide a significant cut and retaining wall along the Cambridge Road frontage. No detailed information is provided with regard to the engineering design of this structure to ensure that it will be fit for purpose and provide suitable ongoing support for the roadway and footpath.

...

It would appear that the Cambridge Road frontage will be a blank wall approximately 1500mm high (forming the rear of the plant room) with presumably wire security fence to prevent climbing on the roof. There are no details regarding this elevation which is a fundamental consideration of the Cambridge Road streetscape.

Response

With regard to the extent of cut and retaining along Cambridge Road, a series of draft permit conditions were provided in Chambroad Australia's previous representation (representation no. 18), for the Panel's consideration. This includes a condition requiring detailed engineering plans to be submitted to the satisfaction of the Commission, confirming the design of the retaining structure(s) and any measures necessary to ensure the stability of the road reservation during construction.

The rear elevation of the plant room and interface with Cambridge Road will incorporate a low wall, with a green roof behind. Whilst further refinement of this interface, including any security measures (if required) would be determined during detailed design, these considerations can also be discussed during the upcoming hearing.

Response to Technical Report Queries

The Council's submission raises various technical matters in relation to the submitted MPIS supporting reports.

These matters have been largely addressed by Pitt&Sherry, as part of Chambroad Australia's previous submission (Representation no. 18).

- However, further clarification has been provided with this submission and can be found at **Attachment B**.

This submission is also accompanied by an additional response prepared by Marine Solutions, in response to Council queries regarding Natural Values.

- This response can be found at **Attachment C**.

3.1 Representation no. 24 – Aboriginal Heritage Council

Jenname Consultancy and Milangkani Projects were commissioned by Chambroad Australia, to undertake early community consultation with members of the Aboriginal community. The inputs assisted in the concept design for the project and are detailed in Attachment 02, forming part of the MPIS submission.

A detailed response to the matters raised by the Aboriginal Heritage Council is provided in **Attachment C**, which accompanies this submission.

Chambroad Australia are open to further discussions during the upcoming hearing process, to establish potential permit condition(s) to enable appropriate implementation.

4.1 Representation no. 25 – Building Tasmania

Building Tasmania (formerly Department of State Growth) have not raised any substantive comments in relation to transport or land use planning matters. However, the submission does identify several matters for consideration below.

Matter(s) raised

We note that while the major impact statement specifically identifies the development of active frontages along the boardwalk and Kangaroo Drive, the provision of an active transport pathway through the site is less clear based on the supporting material (e.g. Figure 20 in the Transport and Movement Study, and within the Traffic Impact Assessment).

The provision of a continuous active transport pathway through the site is critical to allowing continued public access to the foreshore and supporting connectivity to the Bellerive and Kangaroo Bay areas. It also aligns with existing strategic cycling plans (for example, the Greater Hobart Cycling Plan and Clarence Cycling Strategy).

We encourage the Commission to clarify the inclusion of an active transport pathway through the site, ensuring improved connectivity and adequate space and safety for all pedestrians and cyclists, and include this as a requirement in the final permit.

Response

Chambroad Australia acknowledges that active transport and pedestrian movement and connectivity through the project site is a key priority.

The shared pathway along the waterfront has been designed to accommodate a range of users and active transport modes and welcomes further discussion at the upcoming Hearing.

3. Response to Community Organisation Submissions

The following has been prepared in response to representations from members of the public and community organisations, and the matters therein, following the public exhibition of the Major Project Proposal.

5.1 Representation no. 5 – Bicycle Network Tasmania

This representation raises queries regarding the width of the shared waterfront pathway and its suitability for cycling.

Matter(s) raised

The key matters raised in the submission are reproduced below:

Plans for the site show the developer will re-construct the Foreshore Trail at 3 metres width to flow around the point, joining the two ends of the path.

However, the Architectural and Landscape plans show the Foreshore Trail would be hemmed in by seating blocks on one side and outdoor dining on the other, with no extra width to ensure people could easily pass each other.

As well as creating a crash risk on the edge of the path, encouraging people to sit right on the edge will further narrow the useable width of the path for people moving through.

According to Austroads guidelines, structures like seating and fencing should be set back 1 metre from the path and at the busiest points the path should ideally be wider or separate people riding from people walking.

The plans should be amended to remove fixed hazards like seating and raised edging 1 m away from the edge of the path. Ideally seating would be moved well off the path as the potential for dogs, children and outstretched legs to narrow useable width is significant.

Response

Given the anticipated activity generated by the proposed hotel and associated food / beverage offerings, the shared pathway along the waterfront has been designed to cater for a variety of users and is expected to function as a low-speed environment.

Whilst there may be opportunities during detailed design to investigate options to achieve additional separation around the pathway, objects such as landscaping / seating (for example) have been sited to avoid encroachment within the shared pathway.

Chambroad Australia are open to exploring the implementation of additional information / signage / notices, to enhance the safety and efficiency of the space and ensure all users are aware of the low-speed environment.

Notwithstanding, both routes have been designed to be accessible to a range of users and will represent a considerable improvement over what is currently an informal gravel pathway.

These matters can be discussed in further detail during the upcoming hearings.

6.1 Representation no. 15 – Cycling South

This representation raises similar queries regarding the width of the shared waterfront pathway and its suitability for cycling.

Matter(s) raised

Volume 2 – Consolidated Plan Set 3 - Car park and Infrastructure

It identifies the existing shared path for walking a cycling (dotted green line) as part of the Clarence Foreshore Trail as well as a connection to the Cambridge Road/Clarence St intersection.

However, the proposed plans do not show any accommodation of cycling movement on this eastern side of the site or retention of the link to Clarence St. Cycling commuters heading to/from the ferry or from the Tasman Bridge heading to Bellerive/Howrah will want a direct and unencumbered route which is likely to be through the carpark, but this has not been accommodated in the plans.

Volume 3 – Attachment 3 - Architectural Design Report (Part 2, page 38) MPIS A 2.14 – shows the precinct is well-connected by an extensive network of recreational spaces, pedestrian paths, and cycle routes that integrate the waterfront with surrounding urban and community areas. It also acts as a key node between Cambridge Road and Kangaroo Bay Parklands.

These links are not adequately accommodated in the hotel plans.

Response

The existing route through the eastern portion of the site is informal, unsealed (gravel) and used by pedestrians, cyclists and vehicles (including commercial vehicles and boat trailers).

The proposed shared pathway along the waterfront provides a continuation of the existing Clarence Foreshore Trail, utilising the foreshore space instead of diverting users to the eastern side of the project site.

It is assumed the reference made to Clarence Street is in fact in reference to the existing pedestrian pathway to the immediate north of the project site, linking Cambridge Road and the southern end of Kangaroo Bay Drive. The proposed major project does not alter this connection.

Cyclists seeking to avoid the shared waterfront pathway are welcome to utilise the new accessway, which passes through the eastern portion of the site and proposed car parking areas. This area also includes a pedestrian footpath along the eastern elevation of the proposed hotel, providing continued public access through the site between the Bellerive Yacht Club and Marina and Kangaroo Bay Drive.

Matter(s) raised

Amendments required to meet the objectives for adequate movement of people on wheeled devices

1. Adherence to Austroads Guide to Road Design Part 6A Paths for Cycling and Walking

The proposed 3.0m wide shared path around the foreshore is inadequate for the amount and type of use. Due to the side friction from people entering and exiting the outdoor dining area and blocks used for seating, the clear width of the path should be 4.0m. Seating should be arranged so that legs are not intruding onto the path.

Response

As shown in the Landscape Concept Plans submitted with the MPIS, outdoor seating associated with the restaurant and food / beverage offerings are in designated areas, separated from the 3m wide shared pathway.

Chambroad are open to investigating opportunities which may allow additional width (e.g. around the south-western corner of the project site), and welcome further discussion during the upcoming Hearings.

Matter(s) raised

2. Provide alternative route through the site for cycling commuters to avoid congestion Areas.

The Pitt and Sherry Transport and Movement study identified pedestrian movement through and around the site but did not specify movement for wheeled devices, apart from a reference to the Clarence Foreshore Trail around the waterfront side of the hotel (See diagrams below).

Figure 20 in Volume 3 – Attachment 21 – transport and movement study has not included the ramp from Clarence St to the foreshore trail in the movement study, which is a major commuter route between Clarence St and the Tasman Bridge.

A footpath for pedestrians that runs parallel to the roadway connecting Kangaroo Bay Drive and the Bellerive Yacht Club car park has been identified in the plans. This corridor should be planned to accommodate cycling movements from Clarence St as well as provide an alternative route for commuting riders who want to avoid potential congestion on the foreshore at busy times.

It may require a wider footpath to accommodate shared use or a cycling-friendly roadway design. A wide pathway around the turning circle and threshold treatment across the entry to the loading zone is essential to prioritise people over motor vehicles (see yellow highlighted areas). They should seamlessly join to provide directness for anyone using a wheeled device.

In summary, the main pathways will be accommodating movement through the site as well as acting as a destination where people may gather. Adequate space is required for

people to interact without stress or conflict that can arise when space is constrained and congested.

Increasing the width of the Clarence Foreshore Trail and providing an alternative and seamless route for cycling on the eastern side of the hotel is required to meet the active transport objectives outlined in the reports.

Response

The publicly accessible pathways through the project site have been designed to accommodate a variety of user groups and transport modes. As pedestrian foot traffic is expected to be the most dominant, priority is given to pedestrian movement and safety within what is intended as a low-speed environment.

Notwithstanding, both the waterfront pathway and the accessway through the eastern car parking / circulation area are considered suitable to accommodate a variety of users, including cyclists. As noted previously in this submission, Chambroad Australia are open to investigating options to increase the width of the shared pathway through detailed design and welcome further discussion during the Hearings.



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Attachment A – TFS Response

MEMO

Project: KANGAROO BAY HOTEL MAJOR PROJECT

Date: 2026 - 07- 24

Attention: Jesse Lockhart-Krause / Phil Gartill

Topic: TFS response to submission

Disclaimer: This memo (including any enclosures and attachments) has been prepared for the exclusive use and benefit of the addressee(s) and solely for the purpose for which it is provided. Unless we provide express prior written consent, no part of this report should be reproduced, distributed or communicated to any third party. We do not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report.

The intent of this memo is in response to the letter received from Tasmania Fire Service (TFS) in response to the Invitation to Make a Representation – Kangaroo Bay Hotel Major Project (June 2026).

The following responds to each query within the letter to provide confidence that the fire services design has considered fire fighting operations for this project in compliance with NCC and applicable Australian Standards.

- The hotel may incorporate sections of façade with full waterfront exposure, potentially restricting firefighting access, particularly for aerial appliances. Where access limitations exist, consideration may need to be given to enhanced fire safety measures and systems within the building. **NEURON RESPONSE: Additional external fire hydrant provisions can be considered to waterfront zones to allow operational outcomes**
- The design should demonstrate how firefighting aerial appliances will be able to access the building to undertake rescue and firefighting operations, including the provision of suitable hardstand areas where access may be required over wharf or open-water structures. **NEURON RESPONSE: Refer to the traffic engineer's review of the 8.8m compact aerial appliances and 12.5m truck (sketches attached for information). As per the markups the design only allows for fire truck access to the land side of the site. Please also note that the port-cochere is largely open air, with a void continuing up to the roof level - which should be sufficient for vertical extension of any aerial appliances.**

- The capacity and capability of the water supply infrastructure should be sufficient to provide the required flows and pressures for the simultaneous operation of all installed fire protection systems, including firefighting water supplies, across all design scenarios. **NEURON RESPONSE: The consultant team has assessed pressure and flow availability and design fire fighting infrastructure in accordance with AS2491 and AS2118**
- Consideration should be given to how emergency services may access a static water supply source, such as the Derwent River (close to the site), as a supplementary firefighting water supply in the event of an emergency. **NEURON RESPONSE: we do not recommend making allowance for water supply provisions from the Derwent River based on future operational performance as a result of the water impacts on infrastructure. The water supply has been assessed and compliance achieved with adequate fire fighting equipment**
- The design should provide suitable access for emergency service vehicles to critical firefighting infrastructure, including hydrants, sprinkler booster assemblies, and other fire service connections. **NEURON RESPONSE: this has been considered in accordance with NCC and Australian Standards**
- During the construction phase, an adequate and reliable firefighting water supply should be maintained to support emergency response activities. **NEURON RESPONSE: Agreed. Infrastructure to be considered during construction staging to minimise impact of temporary-only services.**

Kind regards,

Ben James

Director



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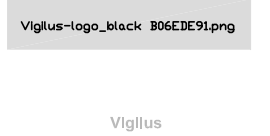
e: ben.james@neuron.build

w: www.neuron.build

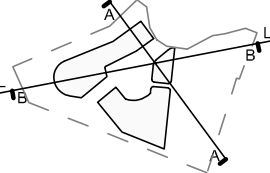
Client:



Architect:



Key Plan:



Revision History:

Rev A: 25/08/2025
Rev B: 03/09/2025
Rev C: 05/09/2025
Rev D: 12/09/2025
Rev E: 19/09/2025
Rev F: 17/10/2025
Rev G: 21/10/2025
Rev H: 27/10/2025
Rev I: 28/10/2025
Rev J: 31/10/2025
Rev K: 06/11/2025
Rev L: 21/11/2025
Rev M: 17/02/2026
Rev N: 19/02/2026
Rev O: 22/06/2026
Rev P: 29/06/2026
Rev Q: 29/06/2026

Checked:

JLK

Drawn:

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Issued For:

MPIS Amendments

Revision:

Rev Q

Date:

29/06/2026

Scale:

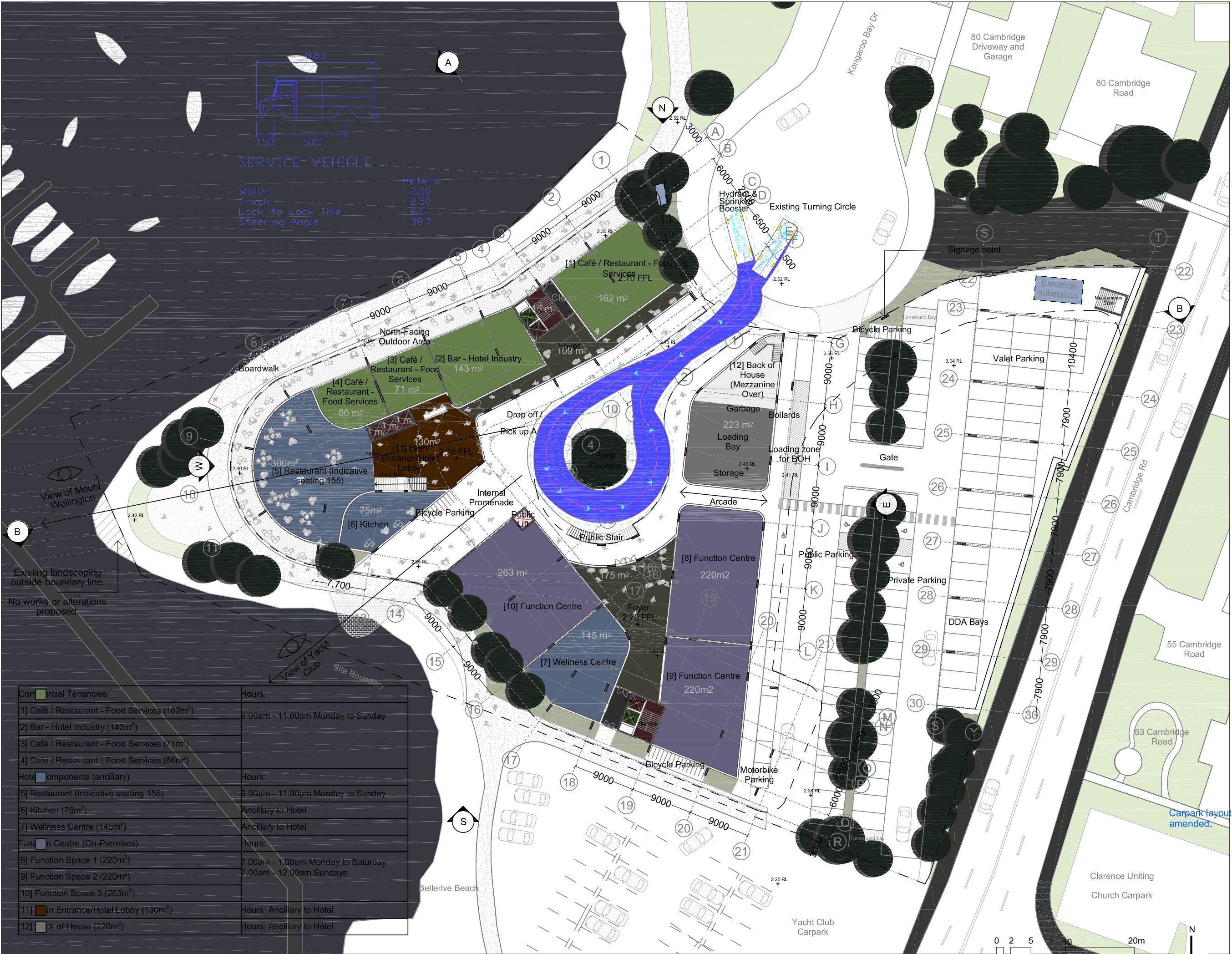
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Ground

Drawing No:

A.02



Client:



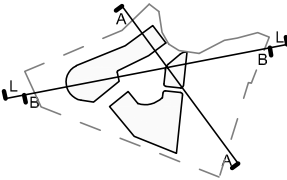
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Architect:

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Vigilus

Key Plan:



Revision History:

Rev A: 25/08/2025
Rev B: 03/09/2025
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Rev K: 06/11/2025
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Rev N: 19/02/2026
Rev O: 22/06/2026
Rev P: 29/06/2026
Rev Q: 29/06/2026

Checked:

JLK

Drawn:

LE

Issued For:

MPIS Amendments

Revision:

Rev Q

Date:

29/06/2026

Scale:

1:500 at A3

Drawing Name:

Ground

Drawing No:

A.02



Attachment B – Council Response (Pitt & Sherry)

27 July 2026

Julian Green
Director
Skyscape
20 York Street
BELLERIVE Tasmania 7018

Dear Julian

Re: Clarence City Council Responses

The following provides pitt&sherry's responses to Clarence City Council's (CCC) comments they have raised on 1st July 2026, signed by Ian Nelson. These CCC comments provide items raised by GHD and Council that address Coastal, Construction Management, Environmental, Flood Hazard, Geotechnical, Infrastructure, Landscape, Natural Values, Stormwater and Traffic queries. This document provides responses to the pitt&sherry items which addresses all of these excluding Landscape and Natural Values. The CCC comments are listed below in bold, with the pitt&sherry (P&S) responses below.

Yours sincerely

Kieran O'Connor
Project Manager

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negligible impacts at site, but can be undertaken if a commercial agreement is reached.

Provide clarity and documentation on Delft3D model setup, data sources, and model performance results.

P&S Response:

DELFT3D-WAVE is an industry standard numerical hydrodynamic simulation software package which solves the discrete spectral action balance equation. The software is suited to domain-level analysis of phase averaged wave transformation based on an input spectra, physical processes, and terrain. The following inputs were used in the DELFT3D-WAVE model:

1. Bathymetry and topography, mosaicked from a combination of feature survey, high-resolution depth-sounder derived bathymetry freely available through sources such as Garmin, multi-beam lidar-derived bathymetry through Geosciences Australia, and topography from the 'ELVIS' elevation and spatial data portal. Computational grids were nested in increasing resolution, to 1-metre cell sizes.
2. Coastlines per the Land Information System Tasmania (LIST)
3. 1% AEP wind speeds as described in the CIHAR
4. Swell waves as described in the CIHAR
5. Spectral directional resolution of 10°, which is consistent with the resolution of input winds and swell waves
6. Spectral frequency resolution of 0.05hz to 1hz, consistent with the range of wave periods expected for sea and swell states.
7. A Joint North Sea Wave Project JONSWAP input energy spectrum. The JONSWAP spectrum is well suited to the wind-sea states that dominate wave conditions at the site, and is a standard in coastal engineering practice.

All simulated cases reached the SWAN convergence requirement of 98%, which indicates that wave parameters across different computation iterations are consistent with each other in 98% of cells. All models reached convergence within the recommended maximum number of iterations.

Elaborate the comparison of storm tide level derived from the Delft3D model and that read from Canute3, as well as the storm tide level established in research by others.

P&S Response:

The DELFT3D model was not used to derive storm tide outputs.

Storm tide values used in the CIHAR are derived from a combination of the CSIRO's Canute 3 tool and estimated wind setup values. The values calculated are consistent with industry literature (Macquarie Point Coastal Inundation Assessment, BMT 2024), foundational academic studies on the topic (Carley et al. 2008) and the Clarence City Council Local Provisions Schedules defined flood levels and low coastal inundation hazard levels.

Elaborate the comparison of pre- and post-development inundation extent and severity at the site, using more up-to-date surveys.

P&S Response:

The undeveloped site, being at a lower elevation and without the same capacity to dissipate impinging wave energy as the proposed development, is more vulnerable to inundation.

pitt&sherry understands that survey data used in the CIHAR is current because no work has been undertaken since.

Confirm compliance of finished floor levels and other proposed building elements to the inundation hazard assessment, to ensure consistency across all reports and

architecture drawings, and to satisfy the planning requirements.

P&S Response:

p&s has determined that the proposed FFL of 2.7 m AHD and energy dissipating seawalls and/or revetments enables the development to achieve a tolerable risk from coastal inundation.

2.7 m AHD exceeds the defined flood level specified in the CCC planning scheme and matches the low inundation hazard band. Infrastructure services reports and plans, stormwater, flooding, and architectural plans have considered the findings of the CIHAR in their respective design scopes and where necessary implemented design measures to mitigate associated risks.

1.2 Environmental Site Assessment

Testing should be undertaken for a broader range of contaminants particularly those associated with landfills. These include PFAS and nutrients (including nitrate, ammonia and phosphorous) that have not been tested for at the site

P&S Response:

The representation suggested that additional testing should be undertaken for contaminants commonly associated with landfill activities, including PFAS and nutrients (nitrate, ammonia and phosphorus).

The Environmental Site Assessment (ESA) was developed using a staged, risk-based approach consistent with the *National Environment Protection (Assessment of Site Contamination) Measure 1999*, as amended 2013 (ASC NEPM). The investigation scope was informed by a comprehensive review of available historical information, previous environmental and geotechnical investigations, site inspections, regulator feedback, contamination gap analyses and targeted intrusive investigations undertaken between 2018 and 2025, and the selected contaminants of potential concern were based on the site's identified historical uses and potential contamination sources.

Historical landfilling within the broader Kangaroo Bay area was specifically considered during the contamination gap analysis and subsequent ESA investigations. However, multiple environmental and geotechnical investigations undertaken by different consultants did not identify landfill-derived materials, domestic waste, leachate, odours or other indicators typically associated with municipal landfill contamination within the proposed development footprint. Intrusive investigations instead identified reclamation and uncontrolled fill comprising predominantly inert materials associated with historical reclamation activities.

Groundwater investigations undertaken as part of the ESA also did not identify field indicators commonly associated with landfill leachate or PFAS-impacted groundwater. Groundwater conditions across most monitoring locations were consistent with the site's coastal setting and tidal influence from Kangaroo Bay, indicating that marine processes are the predominant influence on groundwater beneath the reclaimed portions of the site.

On this basis, PFAS and nutrients were not identified as contaminants of potential concern (CoPC) requiring investigation under the site-specific conceptual site model (CSM), and the adopted analytical program is considered appropriate and proportionate to the contamination risks identified within the proposed development footprint. A detailed technical justification is provided in the attached memorandum (Appendix A).

1.3 Flood Hazard Assessment Responses

The flood hazard assessment with topographic survey does not reflect the actual current site geometry and elevation

P&S Response:

Topographical survey that has been included within the flood model is as follows:

- Contour & Detail Plan (CIRCA01 10231-01), Rogerson & Birch Surveyors, Rev A, 2nd June 2017
- As-Constructed Plan (41687LM – 1), PDA Surveyors, 20th September 2018

The data was provided to p&s for use within the assessment by the client on 06/05/2025 and 19/09/2025 respectively, noting that the initial report was complete on 10/06/2025.

There are differences between the 2025 survey and the combined 2018/2017 survey, particularly on the eastern embankment and the western revetment. The revetment is less concerning, as the triangulation of different spot heights on the rocks may cause discrepancies, and its also mostly in the bay which will not affect the modelling.

The differences in the embankment side are more of note, and it is clear that the levels have changed from the 2017 survey. Refer to Appendix B showing a the site progress from 2017 to today.

The Report lacks rigorous validation of the hydrology model parameters including the loss values adopted (to demonstrate these are replicating runoff within an expected order of magnitude)

P&S Response:

The loss values used within the flood model have been extracted from the Australian Rainfall & Runoff (AR&R) Data Hub in line with AR&R guidance. For urban areas a lower loss value typical for urban situations in accordance with AR&R guidelines have been adopted.

There is no clarity on the approach to quantifying runoff from the roofed areas within the proposed site. The material reviewed by GHD indicates that runoff in these areas has been ignored and this is covered in the Stormwater Management Plan for events up to the 1% AEP + climate change. The Stormwater Management Plan does not quantify flows in this event. It should be clear (including quantification of flows and how they will be managed), for events up to this event

P&S Response:

Rain that falls onto the roofs within the site will be collected, managed and removed by the proposed stormwater network within the site.

As such, these roofed areas have not been included within the flood model.

The reporting and results presentation should consistently filter results such that they show the same flood extent for the same event

P&S Response:

It is not clear on the specifics of this statement surrounding the reporting and presentation. Further/changes to the reporting and presentation can be provided upon clarification.

In summary, the flood risk could be different in more frequent storms and present a different challenge to manage in terms of stormwater and drainage systems in these events. A range of events, rather than a single AEP, should be considered for this assessment.

P&S Response:

The design storm event of the 1% AEP has been used for this assessment as per industry standard approach to planning requirements.

The main source of flooding to the site is from overland flow from the east. During a more frequent storm event, these flows will be lesser and will cause lower potential flood risk to the site.

As such, the approach of modelling the rarer storm event only is justified.

1.4 Geotechnical Desktop Assessment Report

The criteria require the project to maintain the existing water quality and flow of surface water and groundwater. The Report does not explicitly address this nor discuss the existing conditions, commitments to maintaining these conditions during the works and how risks will be managed. Similarly, the Report does not address the impacts of erosion, siltation, sedimentation, and runoff. At a minimum there needs to be a commitment to develop a soil and water management plan for the project.

P&S Response:

The current ground surface is predominantly gravel hardstand. Surface water infiltrates relatively rapidly or runs off directly into the river. The underlying fill is highly permeable and has direct connection with the river water. A soil and water management plan would be developed with contractors at appropriate stages within the development.

1.5 Infrastructure Services Report

The electrical demand assessment should appropriately quantify and incorporate electric vehicle (EV) charging loads, noting that the current assumptions materially understate the potential contribution of EV charging to maximum demand

P&S Response:

For the current stage of design, the project is not yet progressed to a level where the number of EV charging points is known. As such, and following standard industry practice, the electrical demand assessment used guidance from Appendix C of AS/NZS 3000 (the wiring rules) to provide an appropriate estimate for this stage of design. The estimate provided is also in line with Building Code of Australia capacity requirements for EV chargers. It can be noted that the electrical demand assessment will be updated in future stages of design, where the provision/arrangement/quantity of EV charging points will be re-assessed to determine any associated changes in total site demand. In parallel with this design development, any changes in site demand will be communicated to TasNetworks and assessed as a part of the formal application process.

The electrical demand assumptions for back-of-house areas needs to be justified, as classification of these areas as warehouse space is not considered representative of their function within a conditioned hotel environment

P&S Response:

The electrical demand assessment guidance provided in Appendix C of AS/NZS 3000, used for this project, provides a high level estimation tool based on occupancy types and areas. While this method will not cover all types of building areas, it is considered appropriate for typical applications at this stage of design. The back-of-house areas classified as "Warehouse" occupancies in the demand assessment included plant rooms, fire stairs, loading bays and storage rooms. The electrical demand for these areas is expected to be significantly less than other occupied and conditioned spaces (e.g front of house areas) and, as such, the reduced VA/m² allowance of a "warehouse" zone was deemed more applicable. As the site layouts develop further in future stages of design, the electrical site demand assessment will be updated to suit.

The demonstrated margin between calculated electrical demand and available supply capacity should be reassessed once EV charging and back-of-house loads are appropriately quantified, to confirm the adequacy of the proposed electrical supply arrangement.

P&S Response:

As the site layouts develop further in future stages of design, the electrical site demand assessment will be updated to suit (including EV charging and area loads such as back-of-

house). However, the current estimate is considered appropriate for this stage of design. TasNetworks have indicated that the network has sufficient capacity so support the proposed development and this will be confirmed when the demand assessment is submitted to TasNetworks for review as part of the formal application process (to be completed at a later stage of design).

The proposed potable water meter size needs to be justified through an assessment of operating velocities and alternative meter options, to demonstrate that the selected meter is appropriate for the stated peak potable water demand.

P&S Response:

The meter size nominated is DN100 for general supply. For the peak hour demand of 2.7L/s this corresponds to a velocity of 0.34 m/s. Section 3.1.6.4 of WSA 03-2011-3.1 MRWA Version 2.0 recommends flow velocities in reticulation network not exceed 2.0m/s to avoid uneconomical head losses. Further more 3.4 of AS3500.1 states that the maximum velocity in piping shall be 3.0m/s. The nomination of a DN100 water meter is considered conservative. The nomination of the DN150 fire main corresponds to a flow of 20 L/s and velocity of 1.13 m/s. Section WSA 03-2011-3.1 MRWA Version 2.0 states that for fire flows, velocities up to 4.0 m/s may be acceptable. Section 3.4 of AS3500.1 states the velocity limitation shall not apply to any piping that is used for fire services. The nomination of a DN150 is considered conservative and as noted in the report is to be confirmed by a fire engineer at the next design phase following planning approval.

Wastewater design flows should be consistently derived and clearly documented, including reconciliation of average dry weather flows and adopted peaking factors, to support confidence in the proposed sewer servicing assessment.

P&S Response:

The design flow is based on the WSA 02-2014-3.1 Appendix C Flow Estimation For Undeveloped Areas. It has a dry weather peaking factor that is a function of the gross developed area that is applied to the ADWF and also has an allowance for groundwater infiltration (non-rainfall dependent) and peak inflow (rainfall dependent). The connection size nominated is DN225 and is based on the number of sewer ET's and table 104-A of MRWA-S-104A (Rev 3 2016). This is further validated by section 5.5.4 of TasWater supplement was 02-2014-3.1 MRWA Version2.1 which nominates minimum pipe sizes for reticulation and property connection sewers.

1.6 Stormwater Management Plan

The exclusion of on-site stormwater detention appears reasonable in principle given the modest increase in impervious area and discharge via a new outfall to Kangaroo Bay; however, formal approval from the Clarence City Council Group Manager Engineering Services is required and has not been demonstrated. Reliance on the 2016 Aldanmark engineering feasibility report has not been shown to reflect the conditions or assumptions adopted in the current MPIS, and a requirement for detention cannot be discounted.

P&S Response:

The application forms part of the assessment from Clarence City Council Group Manager Engineering Services to provide an opinion on whether detention can be discounted. The stormwater network discharges directly into Kangaroo Bay, therefore detention is not deemed necessary.

While the proposed underground (minor) drainage layout appears generally reasonable, no DRAINS model outputs have been provided to demonstrate compliance with the 5% AEP design standard

P&S Response:

Drains model outputs can be provided if necessary

No underground drainage has been proposed for boardwalk areas located behind revetment walls, and it is unclear how runoff from these areas is collected and connected to the minor drainage system.

P&S Response:

The proposed stormwater management strategy is concept design - the detail of how the boardwalk area will be drained will be developed through design progression.

No DRAINS modelling has been provided to demonstrate the performance of the Minor drainage system and major overland flow system during exceedance (1% AEP) events

P&S Response:

Drains model outputs can be provided if necessary

Statements regarding overland flow paths from the Porte Cochere are inconsistent with the spot levels shown on the approved ground level drawings, raising concerns regarding the accuracy of the overland flow assessment and the management of runoff from Kangaroo Bay Drive

P&S Response:

The proposed stormwater management strategy is concept design and it is expected that this will be coordinated in more detail with the ground level design as part of further stages. However, the minimal spot levels indicate overflow of the Porte Cochere can be safely directed away from the development.

The flood modelling assessment details that overland flow from Kangaroo Bay Drive is directed away from the development into Kangaroo Bay.

The assessment of overland flow paths is based on pre-development topography only, with no consideration of post-development conditions or the potential for internal flooding, particularly given revetment wall levels exceed the proposed finished floor levels and no evidence or discussion that the minor drainage system has capacity to adequately manage the flood risk in the 1% AEP event.

P&S Response:

The proposed stormwater management strategy is concept design and it is expected that this will be coordinated in more detail in detailed design. This included the management of flows against the revetment wall.

Although the overall water quality treatment approach appears reasonable, no raingarden design parameters or MUSIC source node parameters have been provided, preventing verification of the suitability and performance of the proposed treatment systems.

P&S Response:

Default MUSIC parameters for source and treatment nodes have been utilised for the assessment in accordance with industry standard practice.

The MUSIC modelling has been undertaken using only a single year of meteorological data. As MUSIC is a continuous simulation model and accepted guidance recommends long-term datasets (typically at least 10 years), the results are not considered representative or reliable for demonstrating compliance with stormwater performance objectives

P&S Response:

MUSIC Modelling can be updated to show the results for a long-term dataset (10-year) if required. However, as the 1-year (1993 dataset) was for a year above mean annual rainfall and the results resulted in an actual reduction 7-10% greater than the target reductions, it is

anticipated that the proposals will be compliant with stormwater performance objectives.

1.7 Traffic Impact Assessment

The proposed amendments to the planning scheme parking provision requirements appear to be either: Arbitrary and without justification or source material or based on data that has not been provided and is therefore not auditable

P&S Responses:

Updated responses have been provided to TPC which addresses this comment. Please refer to the TPC Responses in Representation number 18.

SIDRA modelling indicates that queues on the east approach to the Rosny Hill Road / Bligh Street / Kangaroo Drive intersection extend through the Rosny Hill / Cambridge Road roundabout. However, the impacts of this queueing within and through the roundabout have not been acknowledge or assessed

P&S Response:

Please refer to the TPC responses previously completed and included in Representation number 18.

Several traffic engineering recommendations have been identified; however, it is unclear whether these have been incorporated into the design. Examples include relocation of a pole to improve pedestrian sight distances, positioning of the boom gate to improve loading bay access, and proposed crossover and cul-de-sac improvements.

P&S Response:

Please refer to the TPC responses previously completed and included in Representation number 18.

1.8 Transport & Movement Study

The issues identified above in Section 2.7 on the Traffic Impact Assessment review also have a direct influence on the findings and conclusions of the Transport and Movement Strategy Report.

P&S Response:

Please refer to the TPC responses previously completed and included in Representation number 18.

There are several inconsistencies between the Traffic Impact Assessment and the Transport and Movement Study, most notable: Differences in the adopted restaurant land use areas for the traffic generation estimates; and Differences in the adopted land use type for the commercial tenancies within the proposed development

P&S Response:

Please refer to the TPC responses previously completed and included in Representation number 18.

Appendix A – Environmental Detailed Response



Memo

To Julian Green

From Fiona Keserue-Ponte, Certified Environmental Practitioner, Site Contamination Specialist (CEnvP SC) - pitt&sherry

Date 24 July 2026

RE **Response to submission about Environmental Site Assessment - Kangaroo Bay Hotel Development – Clarence City Council Comment Response REQ2026-135895**

1. Overview

The representation from Clarence City Council suggests that additional testing should have been undertaken for a broader range of contaminants, particularly contaminants commonly associated with landfill activities, including per- and polyfluoroalkyl substances (PFAS) and nutrients such as nitrate, ammonia and phosphorus. However, the Environmental Site Assessment (ESA) undertaken for the Kangaroo Bay Hotel Major Project (the project) was developed using a staged, risk-based approach consistent with the principles of the *National Environment Protection (Assessment of Site Contamination) Measure 1999* (as amended 2013) (ASC NEPM). The scope of investigation was developed through a comprehensive assessment process involving review of historical information, previous investigations, site inspections, identification of data gaps and targeted intrusive investigations.

The assessment process commenced with a comprehensive review of available historical information and previous investigations, including the Engineering Feasibility Report (Aldanmark, 2016), Geotechnical Investigation Kangaroo Bay (Scherzic Ground Investigations, 2018), Kangaroo Bay Phase 1 Environmental Site Assessment (GHD, 2018a), Kangaroo Bay Phase 2 Environmental Site Assessment Delivery Report (GHD, 2018b), correspondence prepared by GHD in response to EPA Tasmania comments (GHD, 2018d), information regarding subsequent reclamation works undertaken at the site (Batchelor Construction Group, 2023), and the desktop reviews, contamination gap analyses, site inspections and investigation scoping subsequently completed by pitt&sherry (pitt&sherry, 2023a; pitt&sherry, 2023b; pitt&sherry, 2025). Collectively, these investigations and reviews formed part of a staged and iterative assessment process, culminating in the approach implemented under the latest ESA (pitt&sherry, 2026) submitted as part of the Major Project Impact Statement (MPIS) for the project. Through this process, reclamation fill, historical railway infrastructure, fuel storage and handling activities, potentially uncontrolled fill and acid sulfate soils were identified as the principal potential contamination risks requiring further consideration and formed the basis for the selection of contaminants of potential concern (CoPC) investigated as part of the ESA.

2. Potential for landfill-derived contamination

In July 2018 EPA Tasmania reviewed GHD's Phase 2 assessment (GHD, 2018b) and concluded that the CoPC

selected for investigation were appropriate for the identified potentially contaminating activities, that the sampling density and investigation approach were appropriate, and that a detailed ESA was not warranted on the basis of the available information (GHD, 2018d). Nevertheless, in 2023 pitt&sherry undertook an independent contamination review and gap analysis to determine whether the existing investigations adequately characterised contamination risks associated with the proposed redevelopment (pitt&sherry, 2023a), with particular consideration given to historical references to landfilling within the broader Kangaroo Bay and Rosny area. The review recommended further assessment to determine whether landfill-derived contamination represented a credible risk to the site (pitt&sherry, 2023a), and these recommendations informed the subsequent desktop review, site inspections, development of the Sampling and Analysis Quality Plan, and the intrusive investigations undertaken as part of the latest ESA, which included targeted assessment of those identified data gaps (pitt&sherry, 2023b; pitt&sherry, 2025; pitt&sherry, 2026). Collectively, these investigations did not identify evidence of landfill-derived materials within the development footprint, nor did they identify soil profiles, domestic waste materials, leachate, odours, or other indicators typically associated with municipal landfill disposal areas, and therefore landfill-derived contamination was not identified as a contamination source within the conceptual site model developed for the site (pitt&sherry, 2026).

Additional evidence is provided in correspondence obtained from Batchelor Construction Group, which indicates that the more recent reclamation works utilised imported quarry materials sourced from Hanson's Quarry, with no known requirement for remediation works, contamination validation testing or clearance certification associated with landfill-derived fill materials (Gilbert, R. 2023). This was confirmed during the latest ESA (pitt&sherry, 2026).

3. PFAS and nutrients

PFAS and nutrient-related contamination are commonly associated with landfill leachate. No evidence of any landfill-related contamination (i.e. domestic wastes, odours, leachate) was identified within the development footprint during the investigations completed for the site.

Under the risk-based framework established by the ASC NEPM, contaminants are selected for assessment based on identified site history, observed site conditions, potential contaminant sources and plausible exposure pathways. While historical landfill activities within the broader locality (north of the proposed development footprint) were considered during the desktop assessment and contamination gap analysis process, the in-situ profiles encountered during the ESA, did not indicate that landfill wastes were present within the development footprint. Additionally, findings of multiple intrusive investigations undertaken between 2018 and 2025, both environmental and geotechnical, by a number of different consultants, consistently reported fill materials associated with historical reclamation activities (e.g. reworked natural materials, imported rock fill, concrete, asphalt, brick and other building debris) but did not identify soil profiles indicative of municipal landfill waste, putrescible refuse, ash deposits, landfill leachate impacts or other materials typically associated with landfill-derived contamination (Scherzic Ground Investigations, 2018; GHD, 2018b; pitt&sherry, 2026).

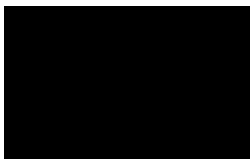
Furthermore, groundwater investigations undertaken as part of the latest ESA did not identify field indicators typically associated with landfill leachate or PFAS-impacted groundwater (e.g. low pH, odours, colours, or foaming). Groundwater quality across most monitoring locations reflected the site's coastal setting and tidal influence from Kangaroo Bay, indicating predominantly marine-derived groundwater conditions, other than along the former foreshore eastern embankment. Therefore, the ESA findings suggest that the main influence on groundwater beneath the reclaimed portion of the site is tidal/marine rather than offsite landfill-derived groundwater.

Accordingly, the lack of PFAS and nutrient-related testing is justified as impacts from historical landfilling north-north-west of the site do not overlap the proposed development footprint.

4. Conclusions

In summary, the ESA was developed through a comprehensive and iterative process involving historical site use reviews, site inspections, regulator consultation, contamination gap analysis, targeted intrusive investigations and risk assessment. On the basis of the available evidence, the adopted investigation scope and contaminant suite are considered appropriate, risk-based and proportionate to the contamination risks identified at the site. While the potential for landfill-derived contamination was specifically considered during both the contamination gap analysis and subsequent ESA investigations, no evidence was identified to indicate that municipal landfill-derived materials and contamination is present within the development footprint and therefore PFAS or nutrients are not considered contaminants of potential concern for the site. The adopted analytical suite is considered suitable for assessing contamination risks associated with historical uses and reclamation within the footprint of the proposed Kangaroo Bay Hotel Major Project.

Yours sincerely,



Fiona Keserue-Ponte
Senior Principal Environmental Consultant, CEnvP SC

Attachments:

- **Attachment A – References**
- **Important Information about your Report**

ATTACHMENT A – REFERENCES

Aldanmark, 2016. *Engineering Feasibility Report – Kangaroo Bay Development*. Prepared for Circa Morris-Nunn Pty Ltd.

Gilbert, R. 2023. *Email correspondence regarding fill material composition and reclamation works at Kangaroo Bay*, dated 10 July 2023.

GHD, 2018a. *Kangaroo Bay Phase 1 Environmental Site Assessment*. Prepared for Circa Morris-Nunn Pty Ltd.

GHD, 2018b. *Kangaroo Bay Phase 2 Environmental Site Assessment Delivery Report*. Prepared for Circa Morris-Nunn Pty Ltd.

GHD, 2018c. *Kangaroo Bay PEA Testing and Management of Deep Soils During Construction*. Letter to Clarence City Council dated 26 September 2018.

GHD, 2018d. *Kangaroo Bay PEA Response to EPA Comments on Phase 2 Assessment Report*. Letter dated 16 July 2018.

pitt&sherry, 2023a. *Kangaroo Bay Contaminated Land Gap Analysis*. Ref. P.23.0373-ENV-LET-001-Rev00.

pitt&sherry, 2023b. *Kangaroo Bay Hotel Development – Phase 1 Contaminated Land Desktop Review and Property Inspection*. Ref. P.23.0373-ENV-LET-002-Rev01.

pitt&sherry, 2025. *Stage 1 Contaminated Land Scope, Chambroad Development Kangaroo Bay*. Ref. T-P.23.0373-ENV-MEM-001-Rev00.

pitt&sherry, 2026. *Kangaroo Bay Hotel Development – Environmental Site Assessment*. Ref. T-P.25.0581-00-ENV-REP-001-Rev01.

Scherzic Ground Investigations, 2018. *Geotechnical Investigation Kangaroo Bay*. Prepared for Circa Morris-Nunn Architects.

Important information about your report

In some circumstances the scope of services may have been limited by a range of factors such as time, budget, access and/or site disturbance constraints. The Report may only be used and relied on by the Client for the purpose set out in the Report. Any use which a third party makes of this document, or any reliance on or decisions to be made based on it, is the responsibility of the Client or such third parties.

The services undertaken by pitt&sherry in connection with preparing the Report were limited to those specifically detailed in the report and are subject to the restrictions, limitations and exclusions set out in the Report. The Report's accuracy is limited to the time period and circumstances existing at the time the Report was prepared. The opinions, conclusions and any recommendations in the Report are based on conditions encountered and information reviewed at the date of preparation of the Report. pitt&sherry has no responsibility or obligation to update the Report to account for events or changes occurring after the date that the report was prepared. If such events or changes occurred after the date that the report was prepared render the Report inaccurate, in whole or in part, pitt&sherry accepts no responsibility, and disclaims any liability whatsoever for any injury, loss or damage suffered by anyone arising from or in connection with their use of, reliance upon, or decisions or actions based on the Report, in whole or in part, for whatever purpose.

In preparing the Report, pitt&sherry has relied upon data, surveys, analyses, designs, plans and other information provided by or on behalf of the Client and other individuals and organisations, most of which are referred to in the Report ("the Data"). Except as otherwise stated in the Report, pitt&sherry has not verified the accuracy, completeness, usefulness or relevance of the Data.

To the extent that the statements, opinions, facts, information, conclusions and/or recommendations in the Report ("Conclusions") are based in whole or part on the Data, those Conclusions are contingent upon the accuracy, completeness, usefulness or relevance of the Data. pitt&sherry does not warrant the accuracy and will not be liable in relation to Conclusions should any of the Data, be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to pitt&sherry.

Appendix B – Kangaroo Bay Aerial Images



Figure 2: Kangaroo Bay, December 2011



Figure 3: Kangaroo Bay in March 2018



Figure 4: Kangaroo Bay, January 2019



Figure 5: Kangaroo Bay, April 2026

Attachment C – Council Response (Marine Solutions)



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Memorandum

To: Julian Green (Skyscape Management Group)

From: Kurt Burgess (Marine Solutions)

Date: 27/07/2026

Subject: Kangaroo Bay Natural Values Assessment - Response to Council Representation

In response to queries pertaining to the Kangaroo Bay Natural Values Assessment (Marine Solutions, 2025), this memo provides additional information about how the proposed works will interact with the natural values of the site. Specifically, this memo aims to:

- Describe in sufficient detail the nature and extent of the proposed works, to complement the existing impact assessment
- Link construction activities to potential impacts, such as sediment disturbance, turbidity, or contaminant mobilisation,
- Link mitigation measures to specific risks, and
- Sufficiently define the scale of the works such that conclusions of the scale of the impacts are not based on assumptions.

Marine Solutions was engaged by Skyscape Management Group in 2025 to conduct a Natural Values Assessment (NVA) for a proposed hotel development on previously reclaimed land in Kangaroo Bay, Bellerive. The nature and development of the proposed works include a five-story hotel, car park and publicly accessible green spaces, and has been declared a Major Project under the Land Use and Approvals Act 1993 (Pitt & Sherry, 2026). The majority of in-water works, including reclamation, were completed in 2018-2019. The extent of in-water works that will occur as this part of project construction are limited in size and duration and will have a correspondingly smaller impact.

Marine Solutions understands that sections of the boardwalk and associated infrastructure will now be cantilevered over the water to avoid pile driving into the marine sediments, and any associated impacts. This will greatly reduce or eliminate the ecological risks that arise from disturbed marine sediments. Further, the proposed construction will occur on previously

reclaimed land, and while sections of the proposed boardwalk may extend out over the existing seawall, these works will not require any further reclamation.

Planned construction activities that have the potential to disturb marine sediments include construction of the publicly accessible footpath along the waterfront of the hotel, specifically the construction of the revetment wall. Despite the disturbance expected to be minimal, and low risk, mitigations to minimize the dispersal of mobilised sediments are still recommended – namely a correctly installed and maintained silt screen.

Analysis of sediment samples found some contaminants exceeded the ANZG lower trigger default guideline values, and in excess of half the samples comprise particles that are finer than 0.125 mm. These fine sediments can be remobilized during in-water works planned as part of the proposed construction. If not adequately contained, disturbance of the sediment leads to two potential risks for the aquatic environment: suspended sediment and released contaminants.

A summary of theoretical risks, and the residual risk levels with silt screen mitigations in place.

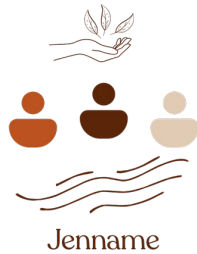
Potential risk	Detail of Unmitigated Risk	Considerations	Unmitigated Risk level	Mitigated Risk Level
Deterioration of aesthetic water quality	Visual plume of suspended sediment moving into the bay and outside the silt screen can be unsightly.	Particle size of substratum in the vicinity of the works. Currents. Duration of risk. Rainfall and current flows	Medium likelihood. Low severity.	Low likelihood. Low severity.
Smothering	Aquatic plants and animals can be smothered by suspended sediment transported away from the site. Mainly a risk for non-mobile organisms.	Particle size of substratum in the vicinity of the works. Currents. Proximity of sensitive receptors.	Very low likelihood. Low severity.	Very low likelihood. Very low severity.
Reduced light penetration inhibiting plant growth	Suspended sediment can significantly reduce light penetration into the water, inhibiting photosynthesis in aquatic plants, such as seagrass and macroalgae. Impacts only noticeable if risk extends over multiple weeks.	Particle size of substratum in the vicinity of the works. Currents. Proximity of sensitive receptors. Duration of works	Low likelihood. Low severity.	Very low likelihood. Very low severity.
Gill clogging	Fine sediments can clog the gills of fish and other aquatic organisms, making it difficult for them to breathe. This can lead to respiratory stress and increased mortality rates. Impacts are rare and mainly an issue for non-mobile organisms such as caged fish and filter-feeders invertebrates in high suspended sediment over an extended period.	Particle size of substratum in the vicinity of the works Currents. Proximity of sensitive receptors.	Very low likelihood. Low severity.	Very low likelihood. Very low severity.

Ecotoxicological effects - acute	Dissolved and particulate-bound contaminants released from sediment with initial disturbance of the substratum.	Contaminant concentration in sediment. Potential flux of contaminants out of disturbed sediment. Sediment particle size. Currents. Proximity of sensitive receptors.	Low likelihood. Low-med severity.	Very low-likelihood. Low severity.
Ecotoxicological effects - chronic	Contaminants released from disturbed sediment	Contaminant concentration in sediment. Potential flux of contaminants out of disturbed sediment. Sediment particle size. Duration of works	Low likelihood. medium severity.	Low likelihood. Low severity.

Proposed Mitigation: Effective use of a silt screen to slow water movement and retain suspended sediment within the silt screen. The type and anchoring of the silt screen must be appropriate to the objective (entrapment of a surface or bottom plume) and site conditions (depth and current). An effectively deployed and maintained silt screen can trap contaminants bound to fine sediment particles and can slow the flow of dissolved contaminants and nutrients. The screen must be regularly inspected and maintained for the duration of the in-water work. Care must be taken during removal of the screen to manage resuspended sediment. Note that the area within the silt screen may experience high concentrations of suspended sediment and high sediment settlement and may experience high concentrations of contaminants.

As detailed in Section 6.1 (Contamination Management) of the Construction Management Plan (Pitt & Sherry, 2026), all erosion and sediment controls will be installed prior to commencing work and secured prior to the site being left unoccupied (i.e. over the weekend), all temporary controls will be removed only after the areas they protect have been stabilised, stormwater drains will be protected using suitable measures (e.g. kerb inlet filters), and outlets to stormwater drains will be stabilised and (where practical) will have suitable sediment traps installed. These measures to manage potential issues of construction near the water outlined in the Construction Management Plan (Pitt & Sherry, 2026) are consistent with what we would recommend. If these measures are adhered to, as well recommendations made by Marine Solutions to mitigate environmental degradation as outlined in the NVA and this memo, Marine Solutions expects that the overall ecological impact of the proposed construction to the Marine Environment will be negligible.

Attachment D – Tasmanian Aboriginal Heritage Council Response (REALM & Milangkani Projects)



REALM

24/07/2025

We welcome the opportunity to respond to the Written Representation submitted by the Tasmanian Aboriginal Heritage Council regarding the proposed Kangaroo Bay Hotel Major Project. The representation raises important matters relating to Aboriginal cultural values, Country, ongoing engagement and the way these values are expressed through the project.

From the outset, the Project has recognised Kangaroo Bay as a living Aboriginal cultural landscape where cultural values continue alongside its contemporary urban function. The Project seeks not only to respond to the physical characteristics of the site, but to support the continuing presence, cultural authority and living connection of Tasmanian Aboriginal people with Country through every phase of design, construction and long-term stewardship.

The Proponent is committed to maintaining an ongoing cultural governance process throughout detailed design, construction and operation. Jenname and Milangkani Projects will be commissioned as Aboriginal cultural advisors and knowledge holders throughout the detailed design and construction stages of the project. Community representatives identified through the Jenname engagement process will continue to provide cultural guidance, ensuring Aboriginal people remain active participants in project decision-making as the Project evolves.

Guiding Principles

- Recognise Kangaroo Bay as a living Aboriginal cultural landscape.
- Continue Designing with Country through the life of the Project.
- Maintain Aboriginal cultural governance throughout design, construction and operation.
- Respect Indigenous Cultural and Intellectual Property (ICIP).
- Commit to truth-telling, acknowledging both the enduring presence of Aboriginal people and the impacts of invasion and colonisation.
- Support long-term Aboriginal stewardship, interpretation, education and participation.

The following response addresses each of the matters raised by the Council, providing clarification where existing work may not have been fully reflected in the submitted material, outlining commitments already incorporated into the project, and identifying how the project team intends to continue working with the Aboriginal community to ensure that cultural values remain integral to the design, delivery and long-term stewardship of Kangaroo Bay.

Item 1: Aboriginal Cultural Values Assessment

The shoreline and surrounding landscape of Trumanyapayna 1 have been substantially modified since invasion and colonisation. While no registered Aboriginal heritage values were identified through the Desktop Search, the Council considers that a broader search of the Aboriginal Heritage Register is necessary to identify and better understand Aboriginal cultural values associated with Kangaroo Bay and the surrounding landscape.

The Council considers it important to reconnect with historical knowledge of Aboriginal use of the land and its cultural values. This forms part of an ongoing truth-telling process that recognises the evolution and change of land use since invasion and colonisation and is fundamental to assessing compliance with Criterion 4.1.

The Major Project Impact Statement (MPIS) does not provide sufficient information regarding the traditional and historical use of the area prior to invasion and colonisation, nor does it adequately address the cultural values of the surrounding landscape.

The Proponent acknowledges the Council's recommendation that a broader understanding of Aboriginal cultural values associated with Kangaroo Bay and the surrounding landscape should inform the ongoing development of the Project.

The Project recognises that the absence of registered Aboriginal heritage values identified through an initial Desktop Search does not necessarily represent the full extent of Aboriginal cultural knowledge, historical associations or living cultural values connected with Trumanyapayna and the surrounding landscape. The Proponent is committed to continuing to build the project's cultural evidence base through ongoing engagement, investigation and collaboration with the Aboriginal community.

1. Broader Cultural Knowledge Review

As the Project progresses, the Project will continue to expand the understanding of Aboriginal cultural values associated with Kangaroo Bay and the surrounding landscape. This process will include:

- Review of additional Aboriginal heritage information where appropriate.
- Consideration of historical records and landscape change.
- Integration of Aboriginal cultural knowledge shared through engagement.
- Identification of landscape-scale cultural values beyond the immediate project boundary.

2. Aboriginal Heritage Register Investigation

Through ongoing collaboration, the Project will undertake a broader review of available Aboriginal Heritage Register information relevant to Kangaroo Bay and the surrounding cultural landscape. This process will:

- Improve understanding of Aboriginal heritage values associated with the locality.
- Identify relationships between the Project site and the broader cultural landscape.
- Inform future design, interpretation and management decisions.
- Complement, rather than replace, ongoing engagement with Aboriginal cultural advisors, knowledge holders and community representatives.

3. Aboriginal Community Engagement

Recognising that cultural knowledge extends beyond documented records, the Project will continue meaningful engagement with Aboriginal cultural advisors, knowledge holders and community representatives throughout future project phases. This engagement will:

- Provide opportunities for Aboriginal knowledge to inform project development.
- Identify cultural narratives and values that may not be represented within statutory registers.
- Ensure lived cultural knowledge informs the evolving design.
- Support a respectful and collaborative approach to decision-making.

4. Integration into Detailed Design

Knowledge gained through ongoing investigation and engagement will directly inform detailed design and implementation. This may inform:

- Landscape and public realm design.
- Interpretation and storytelling.
- Place naming and cultural expression.
- Planting, materiality and ecological restoration.
- Future management and stewardship of the site.

5. Adaptive Project Development

The Project recognises that understanding of Country continues to evolve. As new cultural knowledge is identified through ongoing engagement or future investigations, the Project will seek, where practicable, to incorporate this knowledge into the design, interpretation and long-term management of Kangaroo Bay.

The Proponent is committed to ensuring that the Project is informed by an increasingly comprehensive understanding of Aboriginal cultural values, recognising that meaningful engagement and cultural knowledge development are ongoing processes that continue beyond the planning assessment phase. This approach reflects the Project's commitment to collaboration, continuous learning and the respectful integration of Aboriginal knowledge into the future evolution of Kangaroo Bay.

Item 2 - Original Shoreline Interpretation Process

The Council notes the proposed design does not adequately respond to the original shoreline or to the significance of the area as a living Aboriginal place within the broader cultural landscape. Greater consideration of these values should be reflected in the design of the project.

The Proponent acknowledges the Council's observation regarding the significance of the original shoreline and the importance of understanding Kangaroo Bay as part of a broader living Aboriginal cultural landscape.

At the time of preparing the Project design, historical information was not available to accurately determine the location and extent of the pre-invasion shoreline. The site has also been substantially modified through successive phases of reclamation, infrastructure development and urbanisation over an extended period, making the former shoreline difficult to interpret within the contemporary landscape.

The Project recognises the value of deepening this understanding. As the Project progresses, further historical research, cultural investigation and ongoing collaboration with Aboriginal cultural advisors, knowledge holders, community representatives and relevant experts will continue to build an understanding of the location, character and significance of the pre-invasion shoreline and its relationship to the broader cultural landscape. While successive phases of reclamation and development have altered the physical expression of this landscape, the enduring cultural significance of Trumanyapayna remains. Although the tangible traces of the Mumirimina cultural landscape may no longer be readily visible, the knowledge, stories, cultural authority and continuing connection of the families who called Trumanyapayna home endure within Country and continue to inform its meaning today.

The Project will explore opportunities to reveal and communicate its presence through the built outcome. This will include landscape expression, interpretation, material changes, public art, planting, storytelling, paving treatments or other design interventions that make the historical landscape legible while respecting the contemporary context.

The landscape-led approach adopted for the Project already seeks to strengthen connections between land and water, reinforce ecological character and recognise the enduring relationship of Aboriginal people with Country. Through detailed design and ongoing engagement with Aboriginal cultural advisors, knowledge holders and community representatives, the Project is committed to identifying further opportunities to embed the story of the original foreshore and the broader cultural landscape within the public realm, ensuring these values are expressed in a meaningful, authentic and enduring way.

Item 5 - Ongoing Aboriginal Engagement Framework

The Council welcomes the landscape architecture approach and the application of the Milaythina (Country) centred framework in informing the site design. To achieve the intended outcomes, the proponent should demonstrate an ongoing commitment to meaningful engagement with the Aboriginal community throughout the life of the project, consistent with the recommendations of the Jenname engagement report and the Milaythina framework.

The Project acknowledges the Council's recommendation that meaningful engagement with the Aboriginal community should continue throughout the life of the project. The Proponent agrees that engagement should not conclude with the planning approvals process but should continue through detailed design, construction, implementation and long-term management of the place.

The Project adopts the recommendations of the Jenname Engagement Report and the Milaythina (Country)-centred framework as the basis for an ongoing process of collaboration with Aboriginal cultural advisors, knowledge holders and community representatives. This framework recognises that relationships with Country are living and evolving, and that cultural knowledge may continue to inform the project as it develops.

1. Ongoing Cultural Design Collaboration

The Project will continue to engage Aboriginal cultural advisors throughout subsequent phases of the project to ensure that design decisions remain informed by Aboriginal knowledge and values. This process will include:

- Refinement of landscape and public realm elements.
- Cultural interpretation opportunities.
- Place naming and storytelling.
- Opportunities for Aboriginal participation in project delivery.

2. Detailed Design Review

As the project progresses through detailed design, opportunities identified during engagement will continue to be reviewed collaboratively with Aboriginal cultural advisors, knowledge holders and community representatives. This process will:

- Test design outcomes against the Milaythina framework.
- Ensure cultural values remain embedded as design decisions evolve.
- Identify opportunities to strengthen Aboriginal presence within the public realm.
- Respond to new knowledge or opportunities that emerge through continued engagement.

3. Construction Phase Engagement

The Project recognises that construction provides further opportunities for collaboration with the Aboriginal community. During implementation, engagement will include:

- Review of culturally significant design elements before construction.
- Input into interpretation, artwork and cultural installations.
- Participation in key project milestones where appropriate.

- Appropriate management of any heritage discoveries or cultural information identified during construction.

4. Operational and Place Stewardship

The Project acknowledges that cultural outcomes extend beyond project completion. Opportunities will be explored to support ongoing Aboriginal involvement in the activation, interpretation and stewardship of the place, including:

- Ongoing review of interpretation and storytelling.
- Opportunities for cultural events and education.
- Future enhancements informed by continued engagement.
- Mechanisms for updating cultural information as knowledge evolves.

5. Governance and Implementation

The recommendations of the Jenname Engagement Report and the Milaythina framework will continue to inform project governance throughout future phases of delivery. Engagement activities will be undertaken in consultation with appropriate Aboriginal representatives and will respect established cultural protocols and decision-making processes.

6. Long-Term Commitment

The Project recognises that meaningful engagement is founded on enduring relationships rather than one-off consultation. The Proponent is committed to maintaining respectful and genuine partnerships with the Aboriginal community throughout the life of the project, ensuring that Aboriginal cultural values continue to inform the design, delivery, management and ongoing evolution of Kangaroo Bay.

This ongoing engagement framework demonstrates the Project's commitment to ensuring that Aboriginal cultural values remain a living and integral part of Kangaroo Bay, consistent with the intent of the Jenname Engagement Report, the Milaythina (Country)-centred framework and Assessment Criterion 4.1.

Item 6 Aboriginal Cultural Interpretation

"... The expert reports on landscape architecture and Aboriginal cultural engagement make recommendations for opportunities to reflect and interpret Aboriginal culture on the site, such as bilingual English and palawa kani signage and integration of Palawa art, that are not expressly proposed for the Project in the use and development plans in Volume 2."

6.1 palawa kani Language Integration Process

The Project recognises the importance of language as an expression of cultural identity, connection to Country and living Aboriginal culture. Opportunities to incorporate palawa kani language within signage, interpretation, wayfinding and storytelling elements will be developed through a culturally appropriate process led by the Tasmanian Aboriginal relevant language custodians. As palawa kani is an Aboriginal language owned and managed by the Tasmanian Aboriginal community, any use of language within the Project would be subject to appropriate permissions, review and endorsement processes.

1. Implementation

During detailed design and interpretation planning, opportunities for the inclusion of palawa kani will be identified in consultation with the project Aboriginal cultural advisor. Potential applications may include:

- Place names and landscape features.
- Welcome and acknowledgement statements.
- Interpretive signage and storytelling.
- Wayfinding elements.

2. Consultation with Language Custodians

The Project will engage with appropriate language custodians responsible for the management and use of palawa kani. This stage will:

- Confirm the suitability of proposed language applications.
- Identify culturally appropriate words, phrases or narratives.
- Ensure language is used in the correct context.
- Establish approval pathways and cultural protocols.

3. Development of Interpretation Content

Language content will be developed collaboratively with the project Aboriginal cultural advisor. Consideration will be given to:

- Cultural meaning and context.
- Appropriate translations and terminology.
- Pronunciation guidance where appropriate.
- Accessibility and readability.
- Integration with English language content.

4. Review and Cultural Endorsement

All proposed palawa kani content will be reviewed by the relevant language custodians prior to finalisation. This process would confirm:

- Accuracy of language.
- Cultural appropriateness.
- Correct spelling and usage.
- Appropriate attribution and acknowledgements.

No language content will be implemented without necessary endorsements.

5. Detailed Design and Delivery

Following endorsement, palawa kani language will be incorporated into the detailed design of project elements, which will include signage, wayfinding, interpretation, and digital content. Design development would ensure:

- Consistent presentation of language.
- Appropriate prominence and visibility.
- Integration with the broader visitor experience.
- Long-term durability and legibility.

6. Ongoing Stewardship and Future Opportunities

The Project acknowledges that language revitalisation is an ongoing process. Future opportunities to expand the use of palawa kani may emerge over time through continued engagement with Aboriginal cultural advisors, knowledge holders and community representatives, interpretation updates and future project initiatives.

The use of palawa kani within the Project will occur only through consultation with, and approval from, the appropriate Tasmanian Aboriginal language custodians. The Project recognises that palawa kani is Aboriginal cultural intellectual property and that decisions regarding its use, interpretation and application remain with the Tasmanian Aboriginal community.

6.2 Aboriginal Artist Commissioning Process

The Project is committed to creating a minimum of three locally commissioned Aboriginal artworks within the public realm. The future commissioning process will be undertaken in partnership with the project Aboriginal cultural advisor and guided by established cultural protocols to ensure outcomes are authentic and respectful. The proposed process will include the following stages:

1. Cultural Engagement and Project Brief Development

Prior to commissioning artwork, the project team will engage with relevant Aboriginal cultural advisors to establish the project's cultural objectives, opportunities, themes and preferred commissioning approach. This stage will inform the development of an Artist Brief outlining:

- Project context and objectives.
- Desired cultural outcomes.
- Potential artwork locations and formats.
- Budget and program requirements.
- Cultural protocols and intellectual property considerations.

2. Expression of Interest (EOI)

A targeted or open Expression of Interest process will be undertaken, seeking submissions from Aboriginal artists with a demonstrated connection to the region and relevant artistic experience. The EOI will request:

- Artist biography and cultural connections.
- Examples of previous work.
- Initial expression of interest in the project.

3. Assessment and Selection

Submissions will be assessed by a panel comprising representatives of the project team, client organisation and Aboriginal community representatives. Assessment criteria will include:

- Cultural authenticity and connection to Country.
- Artistic quality and relevance.
- Capacity to collaborate with project stakeholders.
- Ability to deliver within project timeframes and budget.

4. Concept Development

The selected artist or artists will work collaboratively with the project team to develop artwork concepts. This stage will involve:

- Workshops and storytelling sessions.
- Site visits and cultural investigations.
- Development of preliminary artwork concepts.

5. Detailed Design and Approvals

Following endorsement of the preferred concept, the artist will work with the project team to prepare detailed designs suitable for fabrication and construction. Approvals will include:

- Client review and endorsement.
- Cultural stakeholder endorsement.
- Technical and safety review.
- Fabrication and installation planning.

6. Fabrication and Installation

Artwork fabrication will be undertaken in collaboration with specialist fabricators where required. The artist will remain involved throughout the fabrication process to ensure cultural integrity and design intent are maintained. Installation will be coordinated as part of the broader project delivery program.

7. Interpretation and Legacy

Upon completion, interpretive material will be developed to communicate the story, meaning and cultural significance of the artwork. This will include:

- Digital interpretation and storytelling.
- Educational materials.
- Artist acknowledgements and cultural attribution.

Throughout the process, Aboriginal intellectual property, cultural knowledge and cultural narratives will remain under the ownership and control of the relevant Aboriginal artists and knowledge holders.

Item 7 Project Commitments

Given that these materials have been relied upon to demonstrate compliance with Criterion 4.1, the Council requests that the Panel give careful consideration to how these commitments will be secured and delivered throughout the life of the project.

The Proponent acknowledges the Council's recommendation and agrees that the commitments contained within the Milaythina (Country)-centred framework, the Jenname Engagement Report and the accompanying project documentation should be translated into clear implementation processes that extend beyond the assessment phase.

The documents submitted with the Development Application establish the strategic direction and design principles that have informed the Project to date. As the Project progresses, these commitments will continue to guide detailed design, documentation, construction and operational planning through a structured process of ongoing engagement, design review and cultural collaboration.

To provide greater certainty regarding implementation, the Proponent has prepared a series of implementation frameworks accompanying this response, including:

- Aboriginal Cultural Values Assessment;
- Aboriginal Cultural Governance Framework;
- palawa kani Language Integration Process;
- Aboriginal Artist Commissioning Process;
- Aboriginal Cultural Knowledge and Heritage Investigation Framework; and
- Original Shoreline Interpretation Process.

These frameworks establish clear processes for consultation, design development, cultural review and implementation, ensuring that the commitments made during the assessment process continue to inform future phases of the Project.

The Proponent is committed to incorporating these frameworks into the project's governance and delivery processes so that Aboriginal cultural values remain an active consideration throughout the life of the Project. This approach recognises that Designing with Country is an ongoing process of collaboration and learning, rather than a single milestone achieved through planning approval.

Accordingly, the Proponent considers that the Project provides an appropriate mechanism to ensure the commitments relied upon in demonstrating compliance with Assessment Criterion 4.1 are capable of being implemented, reviewed and strengthened as the Project evolves.

Item 8 Aboriginal Cultural Knowledge and Heritage Investigation Framework

The Council further requests that any Aboriginal heritage discoveries, historical information, or cultural knowledge identified through ongoing engagement, site operations or future investigations be appropriately recorded and shared with the Aboriginal community.

The Proponent acknowledges the Council's recommendation and agrees that any Aboriginal heritage discoveries, historical information or cultural knowledge identified throughout the life of the Project should be managed in a respectful and culturally appropriate manner.

The Project is committed to working collaboratively with the Aboriginal community and relevant statutory authorities to ensure that any new information identified through ongoing engagement, detailed investigations, site works or future project activities is appropriately documented, managed and, where appropriate, shared with the Aboriginal community.

Recognising that Aboriginal cultural knowledge is not solely archaeological in nature and will include stories, values, practices and connections to Country, the Project will adopt the following principles:

- Any Aboriginal heritage discoveries will be managed in accordance with relevant legislative requirements and agreed cultural protocols.
- Historical information and cultural knowledge identified through ongoing engagement will be documented, where appropriate and with the agreement of the knowledge holders.
- Decisions regarding the recording, storage, interpretation and sharing of cultural knowledge will be undertaken in consultation with the Aboriginal community, recognising that some information may be culturally sensitive or restricted.
- Opportunities will be explored to incorporate appropriate knowledge into interpretation, education and future project initiatives where supported by the Aboriginal community.

The Proponent recognises that ownership of ICIP remains with the Palawa community, including the right to control, protect and develop their cultural heritage, traditional knowledge, and cultural expressions, both tangible and intangible. Accordingly, the Project is committed to ensuring that any recording or sharing of information occurs through appropriate consultation, cultural governance and with the consent of the relevant Aboriginal knowledge holders, while supporting the long-term understanding and appreciation of Kangaroo Bay as a living cultural landscape.

Enduring Commitments

The Proponent commits to ongoing Aboriginal cultural governance; continued Designing with Country; application of ICIP principles; ongoing involvement of Aboriginal cultural advisors throughout delivery; Aboriginal participation in interpretation, stewardship, education and cultural programming; and adaptive management so that Kangaroo Bay continues to evolve as a living Aboriginal cultural landscape.

Kind regards,

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