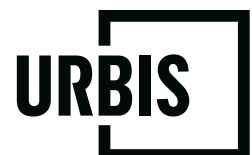




# RESPONSE TO SUBMISSIONS

Taronga Zoo  
Upper Australia Precinct

Prepared for  
**TARONGA CONSERVATION SOCIETY AUSTRALIA**  
9 November 2020



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# 1. INTRODUCTION

This Response to Submissions Report (RtS) has been prepared by Urbis on behalf of the Taronga Conservation Society Australia (TCSA) in response to the agency submissions received during the public exhibition of the Environmental Impact Statement (EIS) for the redevelopment of the 'Upper Australia Precinct' of Taronga Zoo (the Proposal). The EIS accompanied a State Significant Development Application (SSD-10456).

The Proposal was exhibited from 7 August 2020 to 3 September 2020. No community submissions were received during the exhibition period.

## 1.1. Summary of Agency Submissions

The following government agency submissions were received:

- Environment Protection Authority (EPA) recommends conditions of consent to prepare the following documentation prior to commencement of works:
  - A hazardous building materials survey must be conducted on the buildings prior to the commencement of any demolition/construction works on site.
  - An Unexpected Contaminated Land and Asbestos Finds Procedure.
- Environment, Energy and Science Group (EESG) recommends that the development description in the biodiversity development assessment report should be updated and surveys should be undertaken for threatened species identified on site.
- NSW Heritage Council (HNSW) provided the following comments:
  - HNSW requests further visual information (ie. photomontage and design palate) regarding the interface of the new fencing partition on Bradleys Head Road and the sandstone boundary wall.
  - HNSW recommends the project includes a condition to manage historical archaeology through unexpected finds.
  - A designated historical archaeological program is not recommended for the SSD.
  - Before providing final advice on the EIS relating to Aboriginal cultural heritage, HNSW requires all consultation with the RAPs to be completed and documented in the ACHAR, including all consultation documents and a consultation log.
  - Heritage NSW also recommends that additional information on the methodology and results of the site inspection conducted on 8 July 2020 is presented in the ACHAR.
- Transport for NSW (TfNSW) recommends the following conditions of consent:
  - An updated Green Travel Plan should be submitted to TfNSW prior to Occupation Certificate
  - Construction Traffic Management Plan (CTMP) with swept path diagrams should be submitted to TfNSW for review prior to the issue of a Construction Certificate.
- Mosman Council recommends the following conditions of consent:
  - Requirement for landscaping of a sufficient height to be provided in front of fence
  - Requirement for suitable tree replacements to be provided where tree removal is proposed

The Department of Planning, Industry and Environment (DPIE) also recommended further consultation with Heritage NSW (HNSW), Heritage NSW (Aboriginal Heritage) and Environment, Energy and Science Group (EESG) to ensure the issues raised by these agencies are adequately addressed.

All agency responses received to date were supportive of the development on the basis of further information being provided or as detailed in the recommended conditions of consent.

## 1.2. Report Structure

This response follows the following format:

- Biodiversity
- Bradleys Head Road fence
- Archaeology
- Proposed Conditions of Consent – Agencies.

## 2. BIODIVERSITY

A submission received by Environment, Energy and Science Group (EESG) recommended that the development description in the biodiversity development assessment report (BDAR) should be updated and surveys should be undertaken for threatened species identified on site including:

- Swift Parrot.
- Little Lorikeet.
- Squirrel Glider.
- Grey-headed Flying-fox.
- Southern Myotis.
- Little Bent-wing Bat.

An updated BDAR has been prepared by Narla Environmental, enclosed in **Appendix B**. The updated BDAR includes an updated description of the proposal based on the original EIS.

### 2.1. Additional Surveys

The majority of the species identified in EESG's submission are identified in the BDAR as historically recorded on site but under the Biodiversity Assessment Method (BAM) are not considered at risk of Serious and Irreversible Impact (SAII) and therefore do not require a targeted survey. Further information and correspondence with EESG has been incorporated into the final BDAR confirming the methodology and approach for the biodiversity assessment which has been discussed and agreed to with EESG.

Due to the presence of potential foraging habitat for Southern Myotis within the site, targeted surveys for the species were conducted within proximity to the artificial wetlands proposed for removal. Four ultrasonic detection devices were placed onsite over five nights by Narla Environmental based on methodology agreed to by EESG. Results from the survey confirmed the presence of the Southern Myotis and Little Bent-winged Bat.

Based on this additional survey data, offset credits will be required for each species which are outlined in the updated BDAR. Overall, the development continues to minimise impacts on native vegetation with relevant mitigation measures to be implemented during construction and operation of the Precinct.



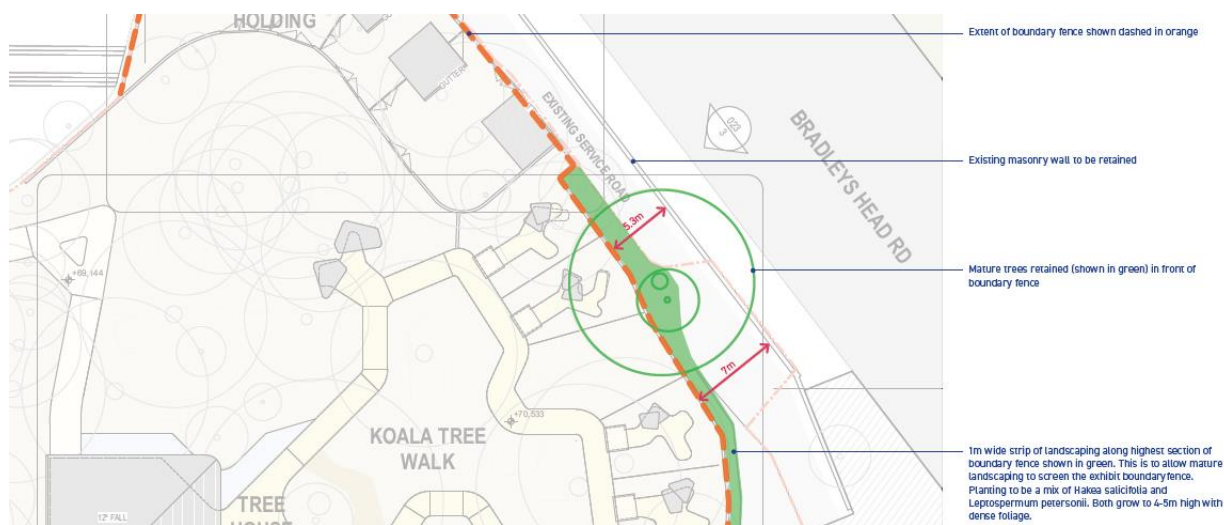
### 3. BRADLEYS HEAD ROAD FENCE

Submissions received by Heritage NSW and Mosman Council requested additional details in relation to the new fence on Bradley’s Head Road. Additional information has been prepared by Lahznimmo and Spackman Mossop Michaels (**Appendix A**) to illustrate how the wall relates to the existing masonry wall and the overall landscaping of the area.

#### 3.1. Height and Location

The fence has been designed at a certain height for the protection of the animals and provides connections to the overall themes of the Upper Australia Precinct. The location of the fence and additional planting are considered a suitable distance to ensure there are no impacts on the heritage significance of the masonry wall. Mature native plantings including a mix of willow-leaved hakea (*Hakea salicifolia*) and teatrees (*Leptospermum petersonii*) are proposed along the site boundary. Both species will grow between 4-5 metres high with dense foliage to a natural element between the masonry wall and new fence.

Figure 1 – Plan showing distance between new fence and existing masonry wall



Source: Lahznimmo

#### 3.2. Design

The fence material will incorporate cement panels with indicative designs shown on the Materials and Planting Selection plan enclosed in **Appendix A**. The design will be further developed in consultation with an Indigenous art consultant to reflect the landscape character of Bradleys Head and the Australian character of the overall precinct.

Figure 2 Updated detail on Bradleys Head Road frontage



Source: Lahznimmo



## 4. ARCHAEOLOGY

Submissions received by HNSW (Aboriginal Heritage) requested a finalised ACHAR with all consultation with the RAPs to be completed and documented in the ACHAR, including all consultation documents and a consultation log.

Additional information has been prepared by Urbis including an updated Aboriginal Cultural Heritage Assessment Report (ACHAR) (**Appendix C**) and Historical Archaeological Assessment (HAA) (**Appendix D**).

### 4.1. Consultation with Registered Aboriginal Parties

The final ACHAR includes information relevant to the completed consultation process and incorporates all the feedback from the Registered Aboriginal Parties (RAPs). Updates have been provided in Section 3.4, 3.4 and 3.5 of the ACHAR. Appendices C and D of the ACHAR also provide a completed log of the consultation process including consultation with HNSW.

### 4.2. Assessment of ACHAR Methodology

The identification of cultural heritage values has been conducted by Urbis in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (OEH 2010) and guided by the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011). Additional information has been included in Section 3.5 of the ACHAR in relation to the methodology for the site inspection as well as a description of the existing environment and confirmation of the already outlined archaeological potential and research significance of the area.

### 4.3. Management Of Historical Archaeology through Unexpected Finds

Urbis has updated the Historical Archaeological Assessment to reflect comments from HNSW in relation to the development of an Unexpected Finds Procedure (UFP). As noted in Section 9 of the HAA, any historical archaeological constraints will be managed through monitoring and chance find procedure and no designated archaeological program such as excavation is needed.



## 5. AGENCY CONDITIONS OF CONSENT

Transport for NSW, Mosman Council, Heritage NSW and NSW Environment Protection Authority recommended conditions of consent be included as part of the determination of this application. These are documented as follows, together with a summary of the Applicant's position on each of these conditions:

Table 1 - Recommended Conditions of Consent - Agencies

Agency	Recommended Condition	Applicant Response
<p><b>Transport for NSW</b></p>	<p><u>Green Travel Plan</u></p> <p><i>It is requested that prior to the issue of the first Occupation Certificate, the applicant be conditioned to update the existing Green Travel Plan in consultation with TfNSW. The updated GTP would apply to all zoo staff and visitors and should include:</i></p> <ul style="list-style-type: none"> <li>• <i>Appointment and details of a Travel Plan Coordinator to oversee the implementation of the GTP;</i></li> <li>• <i>Inclusion of latest TAG version (which currently is reviewed every 6 months according to the Transport Impact Assessment);</i></li> <li>• <i>Details of mode shifts achieved since the first GTP was issued in 2015; and</i></li> <li>• <i>Details of how the GTP will be monitored and reviewed including Travel Surveys for Staff, Visitors, Students.</i></li> </ul>	<p>Noted. As TCSA is a public authority, there is no CC but will be prepared prior to the completion of the project.</p>
	<p><u>Construction and Traffic Management Plan</u></p> <p><i>It is requested that the applicant be conditioned to prepare a detailed Construction and Traffic Management Plan (CTMP), detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control. A swept path diagram should be provided to demonstrate how the largest construction vehicles enter and exit the site in a forward direction. The swept path diagram should also demonstrate that the largest vehicle is able to turn around at the Taronga Zoo Wharf turning circle.</i></p> <p><i>The CTMP should be submitted to TfNSW for review prior to the issue of a Construction Certificate.</i></p>	<p>Noted. As TCSA is a public authority, there is no CC but will be prepared prior to the completion of the project.</p>

Agency	Recommended Condition	Applicant Response
<b>Mosman Council</b>	<p><u>Tree Removal</u></p> <p><i>It is recommended that a condition be imposed requiring suitable tree replacements to be provided.</i></p>	<p>Noted. TCSA recommends that the condition is amended to ensure tree replacement species remain compatible with the unique nature of the site including exhibit and animal welfare and containment requirements as well as Taronga's own horticulture and public safety requirements.</p>
<b>Heritage NSW (Aboriginal Heritage)</b>	<p><u>Unexpected Finds Protocol</u></p> <p><i>HNSW recommends the project includes a condition to manage historical archaeology through unexpected finds</i></p>	<p>Noted. Details incorporated in the updated archaeological reports.</p>
<b>NSW Environment Protection Authority</b>	<p><u>Hazard Building Materials Survey</u></p> <p><i>A hazardous building materials survey must be conducted on the buildings prior to the commencement of any demolition/construction works on site</i></p>	<p>Noted and TCSA accepts condition.</p>
	<p><u>Unexpected Contaminated Land and Asbestos Finds Procedure</u></p> <p><i>An Unexpected Contaminated Land and Asbestos Finds Procedure must be prepared before the commencement of any demolition / construction works and must be followed should unexpected contaminated land or asbestos be excavated or otherwise discovered during construction. The Unexpected Contaminated Land and Asbestos Finds Procedure must outline the steps to be undertaken to identify, report and manage any signs of potential environmental concern encountered during earthworks/redevelopment works.</i></p>	<p>Noted and TCSA accepts condition.</p>
	<p><i>The Unexpected Contaminated Land and Asbestos Finds Procedure must be implemented throughout construction. If unexpected contamination is found, the applicant must conduct site investigations to determine the full nature and extent of the contamination at the project area. The site investigations must be undertaken, and the subsequent report/s, must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997.</i></p>	<p>Noted.</p>

## 6. CONCLUSION

This response has considered the submissions received from DPIE, EPA, EESG, HNSW, TfNSW and Mosman Council during the exhibition of the EIS for the Upper Australia Precinct of Taronga Zoo.

Following consideration of the government authority submissions, the applicant has provided updated information where requested and resolved to accept the requested conditions with minor amendments.

Overall, the authorities review of the proposal found that generally there are no significant adverse impacts associated with the Project, and recommendations have been made for mitigation measures to reduce these impacts further during construction and operation of the Project.

The Proposal in its current form is considered entirely appropriate for the location and should be supported by the Minister for the following reasons:

- The design positively responds to the site conditions and existing landscape character of the locality.
- The works will facilitate the continued use of the site as an animal exhibit, which is permissible with consent and consistent with the zone objectives. Further, there are no significant environmental constraints that would limit the proposal from being developed at the site.
- The proposed works are respectful of the heritage significance of the overall Australia Precinct and will enhance the original design intent of the Precinct to showcase Australian native animals.
- The works will not have any significant detrimental impact on the scenic, visual and natural bushland setting of Sydney Harbour.
- The proposal has been prepared having regard to State and Council planning policies and complies with the aims and objectives of the controls for the site.
- Subject to the various mitigation measures recommended by the specialist consultants, the proposal does not have any unreasonable impacts on adjoining properties or the public domain in terms of views, traffic, acoustic and environmental impacts.
- The site is well serviced by public transport and various walking and cycling routes. Further, the proposal greatly encourages the use of non-private vehicle options to access the site.
- The project will deliver genuine economic benefits in these challenging times, particularly in creating full-time jobs during construction, and will sustain direct and indirect jobs during its ongoing operation.

Considering the above and the limited issues raised by the community and Government Agencies, it is recommended that the Department approve this SSD Application, subject to appropriate conditions.

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**APPENDIX A**

**ADDITIONAL PLANS FOR BRADLEYS  
HEAD ROAD FENCE**

# APPENDIX B

# AMENDED BIODIVERSITY DEVELOPMENT ASSESSMENT REPORT

# APPENDIX C

# ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT

**APPENDIX D**

**HISTORICAL ARCHAEOLOGICAL  
ASSESSMENT**

