



Our ref: DOC20/614362

Minoshi Weerasinghe
Planning Officer, Key Sites Assessments
Department of Planning, Industry and Environment
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By email: Minoshi.Weerasinghe@planning.nsw.gov.au

Dear Ms Weerasinghe,

Notice of Exhibition of application for Taronga Zoo – Upper Australia Precinct (SSD 10456)

Thank you for your referral dated 30 July 2020 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) proposal.

The proposed development involves:

- Upgrade the existing Precinct including exhibition design and layouts and includes:
- Demolition* of existing structures road, kerbing and a retaining wall, section of boundary wall; a bridge and the platypus house (*most of these works to occur under separate DA for Early works with Mosman Council)
- Excavation of the wetland ponds and conversion of footpaths to boardwalks
- Refurbishment of the existing Nocturnal House
- Construction of a new Koala Encounter and canopy walk;
- Extension of the existing Macropod walkthrough
- Creation of a new western pavilion
- Upgrades to back of house facilities for animal care
- Additional toilets and amenities for staff and visitors
- Other supporting infrastructure and walk ways
- Modifications to the existing rope course and a new entrance

Taronga Zoo, Bradleys Head Road, Mosman, is not listed on the State Heritage Register of NSW. The site has previously been nominated for the State Heritage Register. However, the State Heritage Register Committee of the Heritage Council of NSW determined in August 2019 not to progress the listing as it was not considered a strategic priority and the nomination was closed. Taronga Zoo is listed as a Heritage Item in the Mosman LEP 2012 and on the s170 register of the Taronga Conservation Society Australia. Taronga Zoo has an Archaeological Management Plan (dated 2004), which identifies historical archaeological resources that exist within the broader Zoo. This letter will focus on the impact of the proposal on these aspects of the site (historical archaeological relics), noting the SEARs issued for the project.

Although the SEARs required the preparation and assessment of impacts to Aboriginal cultural heritage, it states this document will not be finalised until 28 August 2020, yet the current application has been advertised with an end date of 3 September 2020.

This SSD application was not referred by DPIE to the team assessing Aboriginal Cultural Heritage Regulation under the *National Parks and Wildlife Act 1974*. That team is now part of Heritage NSW. Please ensure referral of these documents for comments under

the SSD as a matter of priority to adequately inform assessment of the project ahead of the RTS stage with adequate time for their review and comment.

The following reports were considered in our assessment:

- *Taronga Zoo Upper Australia Precinct, Environmental Impact Statement, prepared by URBIS dated 24 July 2020*
- Statement of Heritage Impact, Upper Australia Precinct Taronga Zoo prepared by URBIS dated 24 July 2020
- Historical Archaeological Assessment, Upper Australia Precinct Taronga Zoo, prepared by URBIS dated 23 July 2020

As delegate of the Heritage Council of NSW, I provide the following comments:

Overall the approach to the site complies with policies in the Conservation Strategy, which is consistent with the SEARs. However, it is harder to assess the full changes proposed given part of the works (demolition in particular) has been included in an Early works DA to Mosman Council rather than being included in the current SSD application.

The approach to retaining significant elements and complementing them with new additions, particularly with the Nocturnal House and the Australian Sections 1 and 2 landscaping has reduced impacts to significant fabric. This is consistent with the Conservation Strategy for the site. Limiting heights for new elements (e.g. koala enclosure) have also contributed to managing key views between Taronga Zoo and the Harbour which is also supported. The Architectural plans and section drawings further show the way the lower levels of the proposed new elements are intended to meld into the terraced landscape with supporting design elements further assisting this approach.

The interface of the new fencing partition along Bradleys Head Road to an exceptionally significant sandstone boundary wall, is proposed to be managed through design elements such as natural materials and colours. The application has not included information to demonstrate the proposed approach to manage the interface with this significant part of the site, particularly where an irregular fence height has been proposed and it is an externally viewed element.

Submission of additional visual information (e.g. photo montage and design palate) at response to submission stage would better demonstrate the proposed approach envisaged to managing the change to this part of the site (new fencing along Bradleys Head Road). This information is likely to assist Council in their comments.

The SSD boundary is likely to contain limited evidence predating the 1912 establishment of Taronga Zoo with this part of the site comprising evidence of the former pathways and Zoological structures/enclosures. Structures related to the former 1880s+ animal quarantine station are to the north of the SSD study area. In 2004 an Archaeological Management Plan was prepared for the site which identified areas for management. In 2009 the definition of a relic changed to require significance. Several phases of archaeological excavation have occurred since the plan was prepared which have confirmed evidence of the former layout, but generally the investigations have not added new information to the understanding of the layout.

HNSW supports the proposed approach to managing the previous development phases of the site which retain significance including the former Baboon Pit, the duck pond, former paths etc by not fully removing them and enabling their retention and for interpretation in the landscape.

These features represent physical evidence of the past design and layout which are physical evidence of the changing approaches and philosophies of animal management. While this evidence is now buried, it does not necessarily comprise 'relics' to manage. The former early pathways are highly significant in the layout and understanding of the site, however their alignment is well known and excavation is likely to only confirm this, not contribute new knowledge and understanding of this phase of the site.

Taronga Zoo as a State Government agency should have existing records at State Archives to rely on to confirm these elements of the site. Consequently the current significance assessment attributed to the previous historical occupation dating from Taronga Zoo within the SSD boundary has not been demonstrated in the current assessment documents.

HNSW recommends the project includes a condition to manage historical archaeology through unexpected finds. A designated historical archaeological program is not recommended for this SSD.

Liaison should be sought from Mosman Council to ensure that the values linked to the LEP listing are addressed and appropriately managed.

If you have any questions regarding the above advice, please contact Felicity Barry, Senior Historical Archaeologist at Heritage NSW on (02) 9995 6914 or Felicity.Barry@environment.nsw.gov.au.

Yours sincerely



26 August 2020

Dr Siobhan Lavelle, OAM
Senior Team Leader, Specialist Services
Heritage NSW
Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW