# Attachment F - Socio-Economic Detailed Response

## Prepared by Sydney Zoo and JBA

This submission is provided to the Department of Planning and Environment on behalf of Sydney Zoo Pty Ltd (the **Applicant**) in relation to its Development Application for SSD 7228 (the **Proposal**). The submission addresses planning issues raised in the letter (**Urbis Letter**) dated 10 June 2016 from Urbis Pty Ltd (**Urbis**) which was lodged in response to the Response to Submissions lodged by the Applicant.

The Applicant is in receipt of a redacted copy of the Urbis Letter and its attachments, excluding the "Deloitte 'financial impact analysis' dated 10 June 2016" which has not been made available at the request of Urbis. As such, the Applicant is not in a position to address any additional issues that may have been raised in that report.

#### Planning Issues

A careful review of the Urbis Letter and the available attachments indicates that no new substantive planning issues have been raised by Urbis in relation to the continued objection to the Proposal of its client, Elanor Investors Group Limited (Elanor) which is the owner of Featherdale Wildlife Park (Featherdale).

Each of the issues outlined by Elanor in its original submission were addressed by the Applicant in the Response to Submissions. This was done by summarising all public submissions received and categorising them by reference to the issue raised. As such, all issues were dealt with in an objective fashion, reflecting the weight of concern raised within the community. The Elanor comments were addressed primarily in the following sections/appendices of the Response to Submissions:

- Section 3.3 Identifies issues raised by submission, in particular Table 4 identifies the issues raised by Elanor;
- Section 5.3 Outlines the public consultation process undertaken by the Applicant, including consultation with Elanor; and
- Section 5.9 Addresses socio-economic issues such as public transport access, competitive interactions etc.

Detailed supporting information was provided in the following appendices:

- Appendix B: Community Consultation Report;
- Appendix O: KPMG Socio-Economic Impact Assessment Report; and
- Appendix P: Submission #7 Specific Responses.

For ease of reference, **Table 1** (provided below) lists each issue raised in the recent Urbis Letter and its attachments. The table identifies where each issue has been addressed in the Response to Submissions or elsewhere and provides additional comments on behalf of the Applicant. We note that the Urbis letter summarises each of the issues addressed in the attachments and, as such, the issues have been listed as they are stated in the Urbis Letter.

#### Consultation with Elanor

As required by the SEARs issued for the Proposal, and to ensure that community concerns have been addressed where possible, the Applicant has taken the following consultative actions in relation to Elanor:

- Actively engaged with Elanor to determine whether there are ways to work collectively for the mutual benefit of both parties;
- Provided an addendum to the initial economic impact study that seeks to address Elanor's concerns about the overall socio-economic impact on the community under various scenarios of competition between the Proposal and Featherdale;
- Where there is the potential for overlap in the Australiana exhibits, actively sought to differentiate the Proposal's presentation by:
  - utilising different exhibit formats for example, not including aviaries which are a significant component of the Featherdale exhibitry; and
  - incorporating an Aboriginal heritage and cultural enrichment strategy that is integrated into the Australiana exhibit. This is something that Featherdale does not do.

### Impact on Community

The Applicant has undertaken significant work to assess the likely impact of the Proposal on Featherdale in the context of the Applicant's analysis of the socio economic impact of the Proposal. The conclusions of this work can be summarised as follows:

- The Proposal will not result in Featherdale's business becoming unsustainable, principally because there is sufficient "spare capacity" in the Sydney market to sustain a second zoo with visitation up to 900,000 people per annum. The Applicant has clearly demonstrated that there is significant unsatisfied demand in Western Sydney for a new zoo and that there is scope in the market for the successful operation of both Sydney Zoo and Featherdale, using the analysis of both Urbis and KPMG.
- There is significant differentiation between the offerings of the Proposal and Featherdale, which should ensure that the two venues do not compete directly with each other.
- The Applicant has engaged with Elanor to seek ways to mitigate any potential competitive issues and to find ways to work collectively for the mutual benefit of both parties.
- Even if Featherdale were to cease operation (which is not supported by the analysis), the Applicant's socio economic impact analysis demonstrates the development of the Proposal will still represent an overall net positive contribution to the community both:
  - economically, through investment, jobs creation and economic activity; and
  - socially, though endangered animal breeding programs, indigenous jobs programs, training programs etc. (note that in making these observations the Applicant does not wish to detract from or otherwise diminish Featherdale's own community initiatives).

In short, the Proposal will deliver a much needed iconic tourism and recreation facility in Western Sydney and offer the people of Western Sydney diversity of choice. In doing so, it will improve the social and cultural amenity for the community.

Table 1 – Summary of responses by Sydney Zoo to issues raised by Elanor (Urbis letter dated 10 June 2016)

	Issue Raised	RTS Section/Appendix or other document reference	Sydney Zoo comments
Gener	ral		
1.	The proposal will result in unacceptable economic and social impacts	<ul> <li>Section 5.9 – Socio-economic Impacts</li> <li>Appendix O - Addendum Socio- Economic Impact Assessment Report</li> </ul>	These issues were raised in the original submission by Elanor and have been comprehensively addressed in the RTS Sections and Appendices referenced.
2.	The information provided in the RTS fails to provide a properly researched or balanced • Ap	prepared by KPMG  Appendix P – Submission #7 – Specific	The Applicant does not agree with these conclusions. The Applicant's view is supported by:
		Responses	The significant one-off economic impact from construction of the Proposal, assessed by KPMG to be¹: \$61m increase to Gross State Product; and
			160 increase in FTE employment;
3.	The character of the proposed new zoo and its close proximity will cause significant negative impacts on patronage at Featherdale, reducing the viability of this long established operation, resulting in adverse overall social and economic impacts in the locality		The significant annual economic impact from operation of the Proposal, assessed by KPMG to be <sup>2</sup> : \$39m (low case) to \$57m (base case) per year increase to Gross State Product; and 89 to 120 increase in FTE employment;  KPMG's assessment of the socio-economic impacts of the Proposal on the surrounding region which states that "Sydney Zoo presents a unique opportunity to help achieve Western Sydney's vision for the future" <sup>3</sup> ;  KPMG's conclusion that "there is sufficient "spare capacity" in the Sydney market to sustain a second zoo with visitation up to 900,000 people per annum" <sup>4</sup> ;  The significant differentiation between the offerings of the Proposal and Featherdale (see item 6 below), which should ensure that the two venues do not compete directly with each other; and KPMG's conclusion that even if Featherdale ceases to operate as a result of the Proposal (which the Applicant does not accept and is not supported by KPMG's analysis):  "economic analysis demonstratesthere remains a net positive socio-economic contribution to the communityA net benefit of \$15m and net job creation of the 60 full time equivalent positions are generated for the NSW economy" <sup>5</sup> ; and "the high level of social engagement and education provided by Sydney Zoo would still provide a significant social benefit to the community through the creation of the programs outlined" <sup>6</sup> .

<sup>&</sup>lt;sup>1</sup> Page 31

<sup>&</sup>lt;sup>2</sup> Page 21

<sup>&</sup>lt;sup>3</sup> Page 21

<sup>&</sup>lt;sup>4</sup> Page 23

⁵ Page 35

<sup>&</sup>lt;sup>6</sup> Page 37

	Issue Raised	RTS Section/Appendix or other document reference	Sydney Zoo comments
KPMG	Socio-Economic Impact Assessment Report		
4.	The report does not provide a balanced economic impact assessment of the development on the immediate and broader locality	Appendix O - Addendum Socio- Economic Impact Assessment Report prepared by KPMG	<ol> <li>Low Case<sup>7</sup> – visitation to Sydney Zoo of 500,000 people p.a. and strong competitive impact on Featherdale of 25% visitor reduction creating net visitation of 396,000 to the region;</li> <li>Base Case<sup>8</sup> – visitation to Sydney Zoo of 799,000 people p.a. and slight competitive impact on Featherdale creating net visitation of 789,000 to the region; and</li> <li>Elanor Case<sup>9</sup> – Featherdale closes and Sydney Zoo generates net visitation of 116,000 to the region.</li> <li>The Applicant submits that the inclusion of the conservative Low Case and extreme Elanor Case scenarios demonstrate that KPMG undertook a balanced economic impact assessment of the development on the immediate and broader locality.</li> </ol>
5.	The basis of the market penetration rates and estimated local visitors assumptions in the KPMG report has not been provided. Thus, the report's inference that there is 'spare capacity' for zoo visitation in Sydney given the current market penetration rates is unsubstantiated	<ul> <li>Section 5.9.1 - Response</li> <li>Appendix O - Addendum Socio-Economic Impact Assessment Report prepared by KPMG – Section 6 Sydney Zoo Visitor Assumptions.</li> <li>Appendix P – Submission #7 – Specific Responses –see page 2</li> </ul>	The Applicant does not agree with this opinion. This issue was raised in the original submission and was comprehensively addressed in the referenced sections of the RTS and Appendices.  The Applicant notes that Chapter 6 of the KPMG Report includes three benchmarks for measuring market penetration by zoos in Sydney and estimating projected visitation levels for the Proposal:  Comparable visitation levels and penetration rates for major zoos in Australia and NZ, using data drawn from publications; Observed demand for quality tourism facilities in Western Sydney (current and historical), using data drawn from publications; and Visitation levels for the three zoos in Melbourne, using published data  These benchmarks were then used to conduct a 'bottom up' Sydney visitor estimation using a combination of a "heat map" approach, cross-checked with overall market penetration benchmarking to estimate forecast visitor levels. The penetration rates ascribed to locations on the heat map were derived by reference to the penetration rate benchmarks described above, with higher rates ascribed to closer areas and lower rates to areas further away. In this way, a base case estimate of local visitation of 710,000 p.a. was derived.  A conservative penetration rate of 2% was then used to estimate the number of domestic and international tourist visitors. This number was discounted by 50% for conservatism to derive a total number of tourist visitors of 89,000 p.a. giving a total annual visitation of 799,000 p.a.

<sup>&</sup>lt;sup>7</sup> Page 25

<sup>&</sup>lt;sup>8</sup> Page 25

<sup>&</sup>lt;sup>9</sup> Pages 38-9

	Issue Raised	RTS Section/Appendix or other document reference				Sydney Zoo co	omments		
			The Applicant further notes that KPMG's conclusion that the Proposal "is likely to be unlocking a latent market for non-participants" is reinforced by the Urbis Report dated 12 February 2016 <sup>11</sup> which found that <b>Featherdale's penetration rate of catchment area is approximately 8.6%</b> (visitation of 383,698 p.a. from a total catchment of 4,473,331) versus Taronga Zoo's penetration rate of 130.6% (visitation of 1,464,100 p.a. from a total catchment of 1,121,066). The calculations are shown below:  Table 1A: Catchment assessment				dale's penetration rate of its (3,331) versus Taronga		
			Table TA: Catchin	NSW	Interstate	International	Total	Annual	Visitation as a %
				Residents	visitors	visitors	catchment	visitors	of catchment
			Featherdale Wildlife Park	1,691,066	2,576,398	205,867	4,473,331	383,700	8.6%
			Taronga Zoo	263,649	707,012	150,406	1,121,066	1,464,100	130.6%
			patronage amongs that Featherdale W Applicant submits	st its core geogra Vildlife Park "has that the current la n the facility by its	phic customer be not changed", ack of penetration	pase. Part of this a and " <b>customers</b> on of the local mar	attraction towards are probably looket by Featherda	Sydney Zoo ca oking for differ le reflects the fa	is more vulnerable to lost in be explained by the fact rent experiences"12. The act that there has been es received by them –
6.	The report claims that the Sydney Zoo product is differentiated from Featherdale, and as a result the competitive threat to the Featherdale business should be relatively low. However, no evidence is presented in support of this assertion and the results of the focus group research  Section 2.3.2 – Elanor Investors Group  Section 5.9.1 – Response  Appendix O – Addendum Socio-Economic Impact Assessment Report prepared by KPMG – Section 7.6.1  Featherdale Wildlife Park		The Applicant sub nary comparison:	omits that the di	fferences betweer	n the two facilities		ferenced sections of the RTS ntly, their differing appeal, are	
	conducted by Urbis, confirms this is not the case.		Facility		Zoological faci	Sydney Zoo		Wildlife park	Featherdale
		Responses –see page 1-2	Area		16.5 hectares	псу		3.1 hectares	
			Visitation time		3-4 hours			1+ hours	
			Parking		1,053 spaces				us small overflow area

<sup>&</sup>lt;sup>10</sup> Page 22

<sup>&</sup>lt;sup>11</sup> Pages 11-12

<sup>&</sup>lt;sup>12</sup> Page 9

Issue Raised	RTS Section/Appendix or other document reference		Sydney Zoo comments	
		Animal Heritage	Exotic and Australian	Australian only
		Restaurant	Yes	No
		Kiosks	2	1
		Educational Amphitheatre	Yes	No
		Picnic areas and Gardens	Yes	No
		Wetlands and Waterways	Yes	No
		Quarantine Facility	Yes	No
		Aquarium	Yes, fish and sharks	No
		Reptile and Nocturnal House	Yes	Yes
		Insectarium	Yes	No
		Aviaries	No	Yes – 70% of animal collection; >1,000 birds
		Australian Animals (smaller marsupials and mammals)	Yes – integrated with Aboriginal cultural experience; less than 1.5ha	Yes – focus on petting/"up-close" experience; 100% of facility
		Primates	Yes – gorilla, orangutan, chimpanzee et al	No
		Big Cats	Yes – Lion, cheetah, tiger et al	No
		African	Yes – Giraffe, rhinoceros, hyena, zebra et al	No
		Other Large Animals	Bison, Asian elephant, sun bear, water buffalo, addax et al	No
		expensively than Featherdale and is  The Urbis Report summarised feed focus groups is set out below togeth	larger facility size/amenity and broader animal colles likely to appeal to a different market and/or satisfy back for Featherdale from focus groups. A review per with the Applicant's comments on the applicability of the process between the two facilities.	a different tourism/recreation demand.  of the positive features identified by the
		Table 1C: Focus Group responses	Δ	
		Featherdale Feature	Comm Prime focus of Featherdale, esp. Australian anir	
		Opportunity to get close to animals	'safari' style experience and Australian animals cultural experience	will be presented primarily via Aboriginal
		Affordable ticket prices and free parking (relative to Taronga Zoo ar other animal attractions)	Sydney Zoo will be priced comparatively with Tand	aronga Zoo as a full-service facility

Issue Raised	RTS Section/Appendix or other		Sydney Zoo comments
	document reference		
		thus feel like a natural habitat	Sydney Zoo intends to develop world class modern enclosures and visitor amenities and will be on a much larger scale than Featherdale, reflecting larger size of facility and different animals (African Highlands, African Grasslands, Sth East Asian, Aquarium, Insectarium)
		•	Sydney Zoo will recruit and train high calibre staff, including a 10% FTE Aboriginal employment target
		The animal curator talks and associated education benefits	Sydney Zoo intends to deliver Aboriginal cultural experiences and education (utilising Australian animal section) as well as animal education relating to exotic animals
		The compact size makes it easy to navigate	Sydney Zoo is 16.5 hectares versus 3.1 hectares for Featherdale
		the crowds of Taronga Zoo	Sydney Zoo is forecasting visitation higher than Featherdale with the larger size of the facility and available visitor amenities ensuring an enjoyable visitor experience
		Proximity from home (for Western Sydney residents).	Sydney Zoo hopes to broaden the range of products that appeal to Western Sydney residents, and to grow market penetration by catering to those who are looking for a minimum 3-4 hour zoo experience
		facilities. The following are extracts fro  "the majority recognise that Feathe  "They were attracted to the idea of  "families will be attracted towards the species";  "Focus group respondents made of such as playgrounds, a variety of  "While respondents appreciate that  "limited amenity at Featherdale Wamenity".  Having regard to these observations, tofferings of Featherdale and the Proposition of the seather of the seather of seather of the seather	the Sydney Zoo over Featherdale Wildlife Park because of the variety of international comments that Featherdale Wildlife Park does not have the amenity that Taronga Zoo has food, quality food options and picnic spots"; to Featherdale Wildlife Park is on a different scale and cannot provide to this level"; and wildlife Park will put it at a disadvantage to the new Sydney Zoo which promises extensive the Applicant submits that the focus groups highlight the differences between the product

<sup>&</sup>lt;sup>13</sup> Pages 8-9

<sup>&</sup>lt;sup>14</sup> Page 2

	Issue Raised	RTS Section/Appendix or other document reference	Sydney Zoo comments
			The Applicant has made the Proposal's full service offering and subsequent pricing strategy clear. Pricing strategy is evidently a critical differentiator when families are presented with a choice of attractions.
			The output of the focus groups <sup>15</sup> appears to be as much reflective of the underinvestment and quality of experience provided by Featherdale as it is about the appeal of the Proposal:  "they would still like to see some improvements to amenity at Featherdale Wildlife Park."  "Sydney Zoo promises a high level of amenity which will inevitably provide families with a reason to visit."  "Part of this attraction towards Sydney Zoo can be explained by the fact that Featherdale Wildlife Park has not changed, and customers are probably looking for different experiences".
7.	The extent of the contribution of the Sydney Zoo to the NSW economy is still over-stated. They do not take into account the fact that a material proportion of these values would constitute redistribution from existing facilities such as the Featherdale Wildlife Park.	<ul> <li>Section 5.9 – Socio-economic Impacts</li> <li>Appendix O - Addendum Socio- Economic Impact Assessment Report prepared by KPMG – Section 7 Economic Impact Assessment and Appendix A</li> <li>Appendix P - Submission #7 – Specific Responses</li> </ul>	The Applicant does not agree with this opinion. This issue was comprehensively addressed in the referenced sections of the RTS and Appendices.  In addition, this opinion is predicated on the proposition that Featherdale's business would be made unsustainable by the Proposal. The Applicant does not accept this proposition which is not supported by the available analysis. As referenced above, the KPMG Socio-Economic Impact Assessment concluded that there is sufficient "spare capacity" in the Sydney market to sustain a second zoo with visitation up to 900,000 people per annum and that the Proposal is likely to be unlocking a latent market for non-participants. Further, as outlined in item 6, there is significant product differentiation between the Proposal and Featherdale.  In order to be conservative, KPMG included a Low Case scenario which assumed a lower visitation number for the Proposal with a 25% reduction in Featherdale visitation numbers. In this scenario the annual economic impact from operation of the Proposal is assessed by KPMG to be:  \$39m per year increase to Gross State Product (\$57m in base case); and  \$89 increase in FTE employment (120 in base case).  In the extreme 'Elanor Case', KPMG concluded that "there remains a net positive socio-economic contribution to the community even in the event Featherdale Park ceases to operate in its current form" 16.
8.	The case studies and benchmarks relied on in the report to support the hypothesis that the Sydney Zoo will not have a detrimental trading impact on the Featherdale Wildlife Park, are not comparable.	<ul> <li>Section 5.9 – Socio-economic impacts</li> <li>Appendix O - Addendum Socio- Economic Impact Assessment Report prepared by KPMG – Section 7 Economic Impact Assessment and Appendix A</li> <li>Appendix P - Submission #7 – Specific Responses</li> </ul>	The Applicant does not agree with this opinion. The benchmarks used are described in item 5 above. The Applicant submits that they are relevant to the analysis undertaken by KPMG. Furthermore, they are measures of actual experience.  On the contrary, the Urbis approach of ascribing each census statistical area to its closest zoo, wildlife park or animal attraction on the basis of drive time analysis to derive an <i>exclusive</i> drive time catchment for each attraction does not accord with observed outcomes. This is clearly evidenced by the extreme local penetration rate of approximately 300% (local visitation of >750,000 p.a. from an assumed catchment of 263,649) achieved by Taronga Zoo. This would indicate that the exclusive catchment area does not determine visitation to a high degree of correlation.

<sup>&</sup>lt;sup>15</sup> Urbis Report at page 9

<sup>&</sup>lt;sup>16</sup> Page 35

	Issue Raised	RTS Section/Appendix or other document reference		Sydney Zoo comments		
			The inclusion of case studies is intended to provide real world examples of wildlife facilities operating in close proximity to each other. Arguably, this is also the case with Taronga Zoo and Wildlife Sydney Zoo, and many other tourism/recreation facilities in Australia.			
			and was situated very close to the site of th direct competition with Australian Wildlife Pa	e Proposal. Featherdale continued to op ark until the closure of the parent, Austral antly or otherwise differentiate itself. Syc	ney's population was 20% smaller then than it	
9.	The social impact discussion in the KPMG report only looks at the social programs planned by the Sydney Zoo. The report reaches a simplistic conclusion that since the Sydney Zoo is unlikely to lead to the closure of the Featherdale Wildlife Park, the development will not have any overall adverse social impacts on the community. The KPMG report makes no attempt to consider the potential overall adverse social impacts in the locality if the Featherdale Wildlife Park closes.	<ul> <li>Section 5.9 – Socio-economic impacts</li> <li>Appendix O - Addendum Socio- Economic Impact Assessment Report prepared by KPMG – Section 8 Sydney Zoo Social Programs</li> <li>Appendix P - Submission #7 – Specific Responses</li> </ul>	The Applicant does not agree with this opinion.  The KPMG Socio-Economic Impact Assessment outlines the proposed social programs of Sydney Zoo and refers to the Featherdale social programs as outlined in the Urbis Report before concluding that "In the case that Featherdale were to close operations, the high level of social engagement and education provided by Sydney Zoo would still provide a significant social benefit to the community through the creation of the programs outlined above.  On the contrary, the Urbis Report outlines the Featherdale social programs but is unwilling to consider the social programs or benefits associated with the Proposal, concluding that "there is currently insufficient evidence to demonstrate that the proposed facility at Sydney Zoo could replicate the social and economic benefits currently delivered by the Featherdale Wildlife Park in the same scale or to the same community". This position is replicated in the current submission.  The Applicant submits that this is not a reasonable and balanced approach, having regard to the information that has been provided by the Applicant which clearly shows the depth and breadth of the Applicant's proposed programs, including:			
			Table 1D: Proposed programs  Program	Partner	Submission	
			Aboriginal Cultural Awareness	Muru Mittigar	RTS Appendix H. Refer also to the MOU attached to this document.	
			Ranger Program for Aboriginal staff -	Muru Mittigar	RTS Appendix H. Sydney Zoo has ratified a 10% FTE Aboriginal employment target.	
			Vocational Training and Jobs Placement – animal handling & care, grounds keeping & horticulture, retail services, cleaning, food preparation & handling, customer relations	- TAFE	RTS Appendix H	
			University scholarships, public outreach assistance and educational and research partnerships	Western Sydney University	RTS Appendix H	
			In addition, the Applicant will undertake the	following activities in association with the	operation of the Proposal:	

Issue Raised	RTS Section/Appendix or other document reference		Sydney Zoo comments
		Table 1E: Activities to be unde	rtaken by Sydney Zoo  Description
		Animal Conservation	The Applicant will be a member of the Zoos and Aquarium Association ( <b>ZAA</b> ) and will participate in the ZAA endorsed Australian Species Management Breeding Programs for both local and exotic fauna.  The Applicant is working with the Australian Rhino Project to assist with their efforts in Rhinoceros conservation.
		Animal Care	The Applicant intends to provide veterinary services and animal rescue services through its veterinary clinic.
		Sydney Zoo Foundation	The Applicant is currently establishing an independent Foundation to conduct charitable works in both social and wildlife programs.
		School education programs	The Applicant will have an extensive schools program in both nature conservation and Aboriginal culture. The Applicant will work with Western Sydney University to deliver an interactive and interpretive learning experience.
		Quarantine Facility	The Proposal will operate as a quarantine facility to assist other Zoos with the importation and protection of critically endangered species.
		Breeding Programs	The Applicant will be a member of ZAA and participate in its breeding programs as administered under the Australian Species Management Program – a cooperative conservation program for Australian and exotic species. As such The Applicant will be bound by the stringent requirements of the ASMP and the global Convention on International Trade in Endangered Species of Wild Fauna and Flora ("CITES") treaty. The conduct of breeding programs is also a condition of the Proposal's site lease, and is therefore a fundamental part of the Applicant's operating ethos.
		facility such as the Proposal. \	number of questions that should be addressed in conducting a social impact assessment of a Whilst these matters have been addressed in other material submitted by the Applicant, it is useful to ation of these questions in the context of the Proposal:
		How does the facility interactlearning, employment, enjoy	t with the community? What opportunities does the facility provide to the community (eg. for ment etc)?
		public place a high value on th	ficantly improved amenity and the opportunity for families to spend a full day in picnic areas. The e role of zoos in 18: or living creatures and the natural world;

<sup>17</sup> Appendix A

<sup>&</sup>lt;sup>18</sup> Fraser J. and Sickler, J.(2008) Why Zoos and Aquariums Matter. Handbook of Research Key Findings and Results from National Audience Survey

Issue Raised	RTS Section/Appendix or other document reference	Sydney Zoo comments
		as a place for families to discover new things together;
		<ul><li>as an educational resource for children in the community, and;</li></ul>
		<ul><li>providing the opportunity for a fun day out.</li></ul>
		The Applicant intends to develop its social license through a number of factors benefitting the local community:
		■ Local employment opportunities: The Applicant anticipates employing approximately 100+ employees in a range of roles and levels including curatorial, administrative, landscaping, repairs and maintenance, customer service and retail, food service and cleaning. Importantly the Proposal will have a number of entry-level, flexible positions for young people seeking to join the workforce. The Applicant's brand will be widely recognised and working for the Applicant will represent a good start for young people. The Proposal will offer opportunities for both internal progression and development, and as a credible "brand name" employer will contribute positively to the CV's of staff who choose to move on.
		<ul> <li>Educational programs on Aboriginal heritage. The Proposal will use the Australian Animals exhibit as a platform to educate people about the richness of local Aboriginal culture and history in the local area.</li> </ul>
		<ul> <li>Educational programs on the local natural heritage. Integrated with the Aboriginal cultural message, the Australiana exhibit will focus on animals that are endemic to the local area and their importance.</li> </ul>
		<ul> <li>Development of age appropriate school materials. A strong educational package with respect to the above, and also fostering empathy for animals and conservation ethics in both local and international conservation.</li> </ul>
		Exploring the opportunity for special needs employment. There are a number of jobs that are well suited to assisting the empowerment of special needs workers, in a working environment that is significantly more interesting than most warehouse or factory settings where this work is frequently offered.
		Exploring the opportunity for Aboriginal employment and training. There are obvious opportunities in the education and natural heritage areas, but also within every level within the organisation.
		Participation in breeding programs for endangered species.
		<ul> <li>Animal rescue through the veterinary clinic. Free native animal rescue through the Proposal's on-site veterinary services.</li> <li>Advanced animal husbandry methods and design. Contributing to a better experience for visitors, perceptions of good animal welfare, and actually improved animal welfare.</li> </ul>
		<ul> <li>Animal quarantine facility. Providing a much-needed resource for the importation of animals into Australia.</li> </ul>
		Sydney Zoo Foundation. Creation of a charitable foundation to conduct charitable works in both social and wildlife programs.
		Will opportunities for social and community interactions increase or decrease?
		Opportunities for social and community interaction will demonstrably increase with development of the Proposal.
		How does the facility contribute to a sense of place? Will the facility change the sense of place?
		The Proposal will improve the sense of place for residents of Western Sydney by providing a world class, best practice tourism and recreation attraction within the heartland of Western Sydney. In doing so, it will improve the sense of identity and pride in the neighbourhood. The Applicant aims to be an integral part of the community and has already had discussion with Blacktown Council about (e.g.) how to use community arts projects etc to improve the sense of community improvement in this flagship

Issue Raised	RTS Section/Appendix or other	Sydney Zoo comments
	document reference	
		facility. The Applicant is also working with council to prioritise local schools involvement in work experience programs, and maximizing applications from local residents when looking to hire staff.
		Is the facility consistent with the existing community identity?
		The Proposal is consistent with the community identity and complements the strategic plan of management developed by the Western Sydney Parklands Trust ( <b>The Plan</b> ). The Plan was developed following an extensive public consultation process that was conducted in two stages between June and November 2010. The early part of the process helped raise awareness about the Trust's objectives, and inform the community about the various opportunities to get involved in developing the draft Plan.
		Engagement activities included stakeholder workshops structured around the five Strategic Directions, along with additional workshops focused on the 16 Parklands Precincts identified in the draft Plan. The public exhibition period was supported through newspaper advertisements, a Plan of Management web page, community 'Have a Say' days, online discussion forums, a survey (online and face-to-face) and a '1800' community phone line.
		Over 840 people participated in the public engagement process. About 680 people received information on the draft Plan, contributed to the 'Have a Say' day events or attended the Stakeholder Workshops, and more than 160 people provided comments through the online discussion forums, surveys or written submissions.
		Key stakeholders and the community were asked to identify opportunities, challenges and issues relating to the Strategic Directions identified in the draft Plan and comment on the Precinct Plans.
		This feedback was used to develop the Plan. The Plan was released to the public in December 2010. It is subject to review every seven years.
		The Proposal is consistent with the Plan in the following ways:
		<ul> <li>SD1: Recreation and Parkland Infrastructure</li> <li>A high quality zoo would represent a significant contribution to the infrastructure of Western Sydney and the Parklands in particular. The safari format of the Proposal will lend itself to healthy passive recreation with approximately 2km of walkways through the grounds.</li> </ul>
		<ul> <li>SD2: Environment and Conservation</li> <li>The Proposal is highly complementary to the environmental objectives that are part of the Plan.</li> </ul>
		<ul> <li>a) The Proposal will use extensive natural vegetation for both display and screening purposes throughout the exhibits within the zoo, and as such will serve as a continuation of the natural bush corridor in the Parklands. The Proposal will foster habitats and the residence of native birds, as having them within the zoo will complement the quality of the visitor experience.</li> </ul>
		b) Education and research in the fields of environment, culture and conservation are a central tenet of the operating ethos for the Proposal. to the Proposal will use the exhibition of Australian native animals to highlight the local indigenous

Issue Raised	RTS Section/Appendix or other document reference	Sydney Zoo comments
		culture. It will also develop conservation education programs, and where appropriate will participate in animal breeding programs.
		c) Wherever possible run-off water from rooftops and potentially the car park will be captured to replenish the water features within the Proposal. Any wastewater from cleaning the animal enclosures will be captured and filtered to appropriate quality standards for redistribution as irrigation water over the gardens of the zoo as appropriate.
		<ul> <li>SD3: Culture and Participation</li> <li>A 2008 U.S. based national audience survey found that zoos are culturally important family oriented attractions, and that "The public at large placed a high value on the role of the zoo and aquarium in: <ul> <li>a) teaching children about the natural world,</li> <li>b) teaching children respect for living creatures,</li> <li>c) as a place for parents and children to discover new things together, and</li> <li>d) as an educational resource for children in the community."</li> </ul> </li> <li>In this respect they become an important part of the cultural fabric of the communities that they serve, and a valuable proponent of family and cultural values.</li> <li>How does the facility enhance the character of the locality?</li> <li>The character of the locality is improved by bringing a truly world class, large scale family-oriented tourism and recreation facility to Western Sydney. It is consistent with the NSW Government's intention of improving social infrastructure in the area and as an anchor attraction in the area will serve to attract further investment and improvement in amenity in the area, particularly as WSPT looks to lease further parcels of land from its portfolio.</li> <li>How does the facility enhance or detract from the existing cultural heritage of the locality?</li> <li>The inclusion of education programs that incorporate Aboriginal cultural heritage with the Natural heritage is unique in in zoo's in Sydney and will greatly enhance peoples understanding of the Aboriginal history in Blacktown. Blacktown was at the vanguard of colonial settlement and still contains the largest Aboriginal population in NSW. Upholding this community initiative will be a critical part of maintaining the cultural awareness and heritage in this area.</li> <li>How does the facility enhance or detract from the existing cultural life of thecommunity?</li> </ul> <li>The Proposal provides much needed, family oriented passive recreation and cultural infrastructure for the peo</li>
		environment. When complete, the Proposal will be a major contributor to the social and cultural life of Western Sydney.

	Issue Raised	RTS Section/Appendix or other document reference	Sydney Zoo comments
Elanor	Position		
10.	It is Elanor's position that, in practice, the differences between the two zoo products will not reduce the material impact on the economic viability of Featherdale, and the resulting overall adverse social and economic impact in the locality.	See items 1, 3 and 6 above	The Applicant notes that this statement acknowledges that the product offerings of Sydney Zoo and Featherdale Wildlife Park are differentiated. This is in apparent contradiction to the point below in section 12. The Applicant otherwise disagrees with Elanor's conclusion which has been addressed in the items above.
11.	It is Elanor's position that the key differentiation between Featherdale's customer attractions to other facilities is the interaction between visitors and native animals. The proposed Sydney Zoo includes native animal exhibits, and it is Elanor's position (as supported by the extensive focus group analysis carried out by Urbis) that, in practice, this will materially impact the economic viability of Featherdale, and result in overall adverse social and economic impacts in the locality.		The Applicant disagrees with Elanor's conclusion which has been addressed in the items above.  The Proposal is significantly differentiated based on price, time of stay, amenity, the animal collection and the display strategy. In the Proposal's Australian animals section, the Applicant has sought to further differentiate the Proposal through the inclusion of an Aquarium and insectarium, as well as through the display strategy – for example, by not including aviaries which are a significant component of the Featherdale exhibitry.  The Proposal will be a major Zoo, similar in scale to Taronga, Perth and Auckland Zoos. It will be twice the size of Adelaide Zoo. As a major facility and attraction the Proposal will seek to provide an integrated, full complement of animals.  In order to further differentiate the Proposal's offering from Featherdale, the Applicant has sought to incorporate an Aboriginal cultural advancement strategy into the Australiana exhibit which seeks to contextualise Aboriginal culture with the Australian Animals. The Applicant is doing this in partnership with Muru Mittigar. The Sydney Zoo board has ratified a 10% FTE Aboriginal employment target for the Proposal to deliver this. Featherdale does not have a similar strategy.
12.	Sydney Zoo Pty Ltd has not disclosed any documentation that supports its position that the Zoo expects to open with a full complement of exotic species from the outset. In fact, during the meeting of 13 April 2016 Jake Burgess, of Sydney Zoo Pty Ltd, said words to the effect that the exotic species mix will need to change because of sourcing constraints. It is Elanor's position, based on advice that it has received from Featherdale's Head Curator, that in practice it will not be possible for Sydney Zoo Pty Ltd to open with a full complement of exotic species from the outset. The effect of this is twofold: (i) Sydney Zoo would be heavily reliant on native animal exhibits from the outset; and (ii) Sydney Zoo Pty Ltd's 'product differentiation' argument is fundamentally flawed.	Statement	<ul> <li>The Applicant disagrees with Elanor's conclusions and notes the following:</li> <li>The Applicant provides a letter from the Executive Director of the Zoos and Aquarium Association addressing the issue of exotic animal availability (see attached).</li> <li>The only constraint on the proposed complement of exotic animals is the current unavailability of hippopotamus in Australia, due to the fact that quarantine restrictions currently prohibit their import. The Applicant has switched this exhibit to Asian Water Buffalo, which are readily available in Australia.</li> <li>Significant progress has been made in relation to securing the animal collection and the Applicant fully expects to be able to commence operations with an animal collection in line with that described in the EIS and RTS.</li> <li>The back of house buildings which are the subject of the current application include buildings specifically designed to accommodate a wide range of exotic animals including primates, rhinoceros, giraffes, elephants, lions and tigers – see EIS Appendix C3 Back of House Concept Statement. This is specialised infrastructure that is being developed at significant cost and would not be included if the animals were not available.</li> <li>The Applicant is presenting the Proposal to the market as a complete, integrated and high quality facility. To open with an incomplete exhibition or complement of animals will disappoint the public and set back the operations of the business for years. The Applicant has consistently presented its strategy of opening with a full complement of animals.</li> <li>The Applicant is not seeking approval of the animal collection as part of the current application. Finalisation of the animal collection and siting/exhibition of animals will be undertaken in accordance with the relevant provisions of the Exhibited Animals Protection Act 1986.</li> </ul>

	Issue Raised	RTS Section/Appendix or other document reference	Sydney Zoo comments
13.	Elanor made it very clear to Sydney Zoo Pty Ltd that: (i) the nature and location of the proposed Sydney Zoo (coupled with its support from the Western Sydney Parklands Trust) places Featherdale in a very difficult position and at a distinct competitive disadvantage; and (ii) Elanor is at a loss to see how the proposed Sydney Zoo and Featherdale can co-exist.	Section 2.3.2 - Consultation     Appendix O - Addendum Socio-     Economic Impact Assessment Report     prepared by KPMG – Section 7     Economic Impact Assessment and     Appendix A	<ul> <li>The Applicant disagrees with Elanor's conclusions which have been addressed in the items above.</li> <li>The Applicant also notes that:         <ul> <li>The Applicant is investing considerable funds in a new venture. It has demonstrated a strong willingness to cooperate with Elanor and other parties, to mitigate competitive pressure and ensure the viability of the Proposal.</li> <li>Featherdale is clearly differentiated and will enjoy a price advantage over the Proposal.</li> <li>Featherdale co-existed with the directly competitive Australian Wildlife Park for 14 years, and in that time was not forced to make strategic changes to its offering.</li> </ul> </li> </ul>
14.	Elanor indicated during the meeting on 13 April 2016 that there may be scope for the two zoo operations to co-exist in circumstances where Sydney Zoo's operations are limited to exotic animals only. That proposal was rejected by Sydney Zoo Pty Ltd.	<ul> <li>Sydney Zoo Environmental Impact Assessment</li> <li>RTS</li> </ul>	This comment does not raise any new planning issues.  The Applicant notes that the proposed restriction on the operations of the Proposal would result in:  A material detraction from the vision of the Proposal which is to create an iconic tourist attraction in Western Sydney;  The deletion of a unique aspect of the Proposal being an integrated Aboriginal and natural heritage program;  The diminution of the opportunity to showcase Aboriginal culture and achieve high levels of Aboriginal employment; and  A situation where a zoo located in Australia is unable to participate in the conservation or display of Australian animals.  The Applicant has highlighted the actions taken to differentiate the presentation of Australian animals, including the exclusion of aviaries, the Aboriginal display strategy, and the inclusion of the insectarium and aquarium.
15.	Elanor takes this opportunity to remind the DoPE that the original Environmental Impact Statement (and accompanying Economic Impact Assessment) for the proposed Sydney Zoo failed to undertake any adequate consultation with Featherdale, or even acknowledge the existence of Featherdale. Yet the Response to Submissions now seeks to portray (on the basis of one meeting and no substantiated social or economic analysis) that Featherdale and Sydney Zoo are fundamental collaborative linchpins for a Western Sydney tourism cluster.	Statement Section 2.3.2 – Elanor Investors Group	<ul> <li>The Applicant disagrees with Elanor's conclusions and notes the following:</li> <li>The EIS addressed the existence and impact of the Proposal on Featherdale – see Sections 2.5.1, 4.1 and 6.14.</li> <li>The purpose of the RTS is to address submissions received in relation to the Proposal.</li> <li>The RTS provided a detailed response to each issue raised by Elanor in response to the Proposal and also included a Community Consultation Report (Appendix B) which detailed consultation undertaken by the Applicant with stakeholders, including Elanor.</li> <li>The Applicant has made bona fide efforts to engage with Elanor. On request, the Applicant can provide further details of this consultation.</li> </ul>
16.	We trust that the DoPE will see through the 'collaboration and co-exist' branding in its assessment of the material social and economic impacts of the proposed Sydney Zoo.	N/A	The Applicant disagrees with this characterisation by Elanor. This submission does not raise any new planning issues.
17.	The closure of Featherdale would result in irreversible impacts on broader native animal conservation efforts (including support for approximately 1,000 sick, injured or orphaned native animals that are brought in by the general public each year), a breeding program for the	<ul> <li>Section 5.9 – Socio-economic Impacts</li> <li>Appendix O - Addendum Socio- Economic Impact Assessment Report prepared by KPMG</li> </ul>	The Applicant disagrees with Elanor's conclusions which have been addressed in the items above. The Applicant also notes the following:  The Applicant is required to undertake conservation programs as an obligation under its lease agreement with Western Sydney Parklands Trust. These programs may include a mix of activities such as breeding programs, animal rescue, veterinary clinic services, animal husbandry, animal welfare and research.

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	conservation of endangered species, and the loss of meaningful, well established educational programs. All of these programs are unique to Featherdale and would not be replaced by the new Sydney Zoo.	<ul> <li>Appendix P – Submission #7 – Specific Responses</li> </ul>	<ul> <li>Proposed Building 3 includes substantial accommodation for Veterinary Services on the Proposal site.</li> </ul>
18.	It is Elanor's position that (i) there is no rational or reasonable basis upon which the consent authority could decide to approve the proposed Sydney Zoo because it will clearly result in unacceptable overall adverse social and economic impacts in the locality; and (ii) the DoPE should recommend the proposed Sydney Zoo for refusal.	N/A	The Applicant disagrees with Elanor's submission which does not raise any new issues.