

15 February 2016

Ms Rebecca Sommer
Department of Planning and Infrastructure
Via email: Rebecca.sommer@planningnsw.gov.au

Dear Madam,

SSD 15_7228, Sydney Zoo

Urbis represents Elanor Investors Group (Elanor), the owners and operators of Featherdale Wildlife Park located at 217-229 Kildare Road, Doonside. On behalf of Elanor we lodge this submission in response to the public exhibition of SSD 15_7228 seeking approval for the establishment of a new zoological facility situated within the Western Sydney Parklands referred to as Sydney Zoo.

Elanor objects to the proposal to establish a new zoological facility on the grounds that:

1. The response to consultation directed by the Secretary's Environmental Assessment Requirements is inadequate;
2. The application does not adequately address the economic and social impacts of the proposal; and
3. The proposal will result in unacceptable economic and social impacts.

Elanor has sought legal advice in regard to this matter and a copy of a letter from Gilbert and Tobin is attached confirming their opinion that in the absence of a valid Economic Impact assessment the current application cannot be lawfully determined in accordance with the Environmental Planning and Assessment Act.

Background

Elanor is the owner and operator of the Featherdale Wildlife Park which is located approximately 6 kilometres from the proposed new zoo. Featherdale was established in 1972 and has evolved into the largest exhibitor of Australian Fauna in the world, caring for over 1,700 birds and animals, with over 300 species on display. Featherdale employs over 80 staff and generates over 360,000 annual visitations.

Featherdale cares for the largest collection of Koalas in the state and is an industry leader in the medical care of the species. Featherdale is home to some of Australia's most endangered species featuring animals that are not found in any other zoo in the world. Featherdale's breeding and preservation program is world renowned, playing a vital role in many conservation initiatives. Featherdale provides access to many University and other zoological institutions for the study of species further enhancing the critical role the facility plays in conservation, breeding and preservation initiatives.

Featherdale is the principal breeder of the endangered Tiger Quoll and has exported the species to the USA to foster a breeding group overseas. Featherdale is the only zoo with a permit to collect quolls from the wild to ensure that the breeding group is the most genetically diverse as possible. Featherdale has a strong commitment to animal and environmental education, running highly commended Schools Education Program onsite. Featherdale specialise in educating school children on native Australian fauna. The programs managed at Featherdale meet syllabus requirements at both Federal and State levels. Featherdale partners with TAFE NSW and currently offers 40 positions every week to students for training and education, at no cost, supporting them with their 'Captive Animal Management' career path. Featherdale has received numerous conservation and tourism recognitions over many years and is a finalist in this year's NSW Tourism Awards under the category of 'Major Tourist Attractions'.

The proposal to develop a major new zoo in such close proximity to Featherdale raises significant concerns regarding associated economic and social impacts. Concerns about the potential for impact on Featherdale were appropriately recognised in the Secretary's Environmental Assessment Requirements which directed the requirement for the application to provide, '*Detailed description of the development including:*

- *Need and justification of the proposed development having regard to its location and environmental impacts, the suitability of the site and public interest.*
- *Alternatives considered.*
- *Likely interactions between the development and any existing, approved and proposed operations in the vicinity of the site'*

The SEAR's directed the applicant to consult with Featherdale and for the Environmental Impact Assessment to, '*identify where the design of the development has been amended in response to those issues.*'

Submission

Having regard to the above, Elanor objects to the proposal to establish a new zoological facility on the following grounds:

1. The response to consultation directed by the Secretary's Environmental Assessment Requirements is inadequate

We submit that the application has failed to properly address the requirement directed in the SEAR's regarding consultation with Featherdale. Elanor on the 22 October 2015 provided a written response to an invitation received from the applicant to provide comments about the proposed development – see copy of Elanor letter attached.

Elanor highlighted serious concerns held regarding the potential impacts the proposed new zoo may have on Featherdale, stating that, '*we are concerned that the establishment of a new zoo in such close proximity to Featherdale will undermine the commercial feasibility and therefore justification of the proposal and will result in a range of undesired social and economic impacts on the long established operation at Featherdale.*' Elanor went on to request that, '*the EIS must provide a comprehensive social and economic impact analysis that addresses both the viability of the project as well as an assessment of the impacts of the operation of Featherdale. We request that this analysis be conducted by experienced and respected consultants and that the findings of this research be shared with us prior to completion and inclusion in the EIS.*'

We submit that that neither the Environmental Impact Statement nor the accompanying Economic Impact Assessment prepared by KPMG have properly responded to the issues raised by Elanor, with no evidence that the design of the development has been amended in response to these concerns.

The KPMG report fails to acknowledge the existence of Featherdale and does not provide any assessment of the impact on the existing zoo, or the social and economic impacts in the locality as a result of impacts on the zoo. This is a serious inadequacy in the key technical report presented in support of the application, which fails to comply with the SEAR's and the request from Featherdale articulated in the consultation process.

The EIS in Section 6.14 provides a consideration of 'socio-economic' impacts including a reference to Featherdale, asserting that *'Featherdale Wildlife Park provides a similar tourism offering including animal experiences to those proposed by the Sydney Zoo. However Featherdale generally focuses on farmyard and native Australian species whereas Sydney Zoo will include exotic species.'* The EIS goes on to state that, *'Accordingly, the proposed Zoo and Featherdale provide for differing experiences for guests. This point of difference will ensure that the patronage for both attractions is sourced from different markets, and offers the chance for the Zoo and Featherdale to complement each other's animal experience offerings.'*

The dismissal in the EIS of concerns raised regarding potential impacts of the new zoo on Featherdale are based on un-researched and inaccurate statements. The EIS states that the *'farmyard and native'* focus of Featherdale attracts different patronage from the new zoo which includes exotic species, with the facilities being complimentary rather than competitive. This is clearly not correct as while Featherdale is limited to the display of native species, the new zoo provides both native and exotic species and must therefore be competitive.

It is relevant to note that the description of the proposed new zoo in the Executive Summary of the EIA (page ii) and in the description of the proposal (page 17) states that the application seeks approval for *'animal exhibits across several enclosures of varying design for a range of native and exotic animals'*. Relevantly the EIS states in the description of the proposed development (page 19) that, *'This SSD application does not seek approval for the specific details of each exhibit space as these vary depending on the species within each. Each exhibit space will be in compliance with the relevant requirements under the Exhibited Animals Protection Act 1986 (EAP Act) and will be subject to individual inspection and certification post-construction in order for Sydney Zoo to receive a licence to operate as an exhibited animals facility.'*

It is evident from this that the new zoo is seeking approval for the display of both native and exotic species in largely unrestricted and open ended manner. The EIS response can only be valid if the proposed zoo is seeking approval only for exotic animals. In addition, there is no evidence or research provided in the application supporting the statement in the EIS that *'patronage for both attractions is sourced from different markets'*.

We submit that the EIS response to the concerns raised by Featherdale in the consultation process is inadequate.

2. The application does not adequately address the economic and social impacts of the proposal

The SEAR's direct detailed assessment of any, *'likely interactions between the development and any existing, approved and proposed operations in the vicinity of the site'*. Neither the Environmental Impact Assessment nor the accompanying Economic Impact Assessment provide an adequate assessment for the reasons summarised below:

- The KPMG report fails to acknowledge the existence of Featherdale; it does not provide any assessment of the impact on the proposed new zoo on Featherdale; and does not consider the potential social and economic impacts in the locality as a result of any such impacts. This is a serious inadequacy in the key technical report presented in support of such a major proposal.
- The statements contained in Section 6.14 of the Environmental Impact Statement addressing economic are inadequate as they are presented without any evident research basis; they do not reflect a depth of understanding of the economic and commercial characteristics of zoological

facilities; and they have not given proper consideration to the impacts a competitive new zoo will have on the established operations at Featherdale.

- No meaningful, research social impact assessment is provided in either the Environmental Impact Assessment or the accompanying Economic Impact Assessment.

3. The development will result in unacceptable economic and social impacts.

In the absence of appropriate information accompanying the application, Elanor commissioned an independent economic and social impact assessment to be prepared by Urbis – see attached report.

This report confirms that the proposal will result in significant detrimental economic and social impacts because of the competitive relationship the new zoo will have with Featherdale. The forecast economic benefits arising from the proposed new zoo are significantly overstated as they are not based upon comprehensive research of either Featherdale or the new facility. Detailed investigation by Urbis confirms that the proposed new zoo has the potential to draw significant visitor numbers away from Featherdale, diluting the overall economic benefits modelled by KPMG.

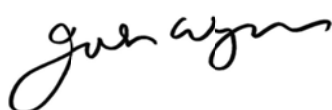
The Urbis research highlights a significant inadequacy on the modelling of the proposal and therefore understates the impact on the ongoing viability of both Featherdale and the new zoo. The extent of impacts identified by Urbis are such that they may result in the failure of either or both operations resulting in detrimental impacts in tourism, employment and other economic/social benefits.

Given the long established and significant role Featherdale plays in the State and local economy with the arising educational, conservation and other broader social benefits arising from its operation, the potential impacts associated with the proposed new zoo are unacceptable.

Summary

We request these matters be considered and we seek an opportunity to meet to enable us to discuss this submission with Department Officers. Please contact me if you have any questions.

Yours sincerely,



John Wynne
Director

Attachments:

- Gilbert and Tobin letter
- Elanor letter dated 22 October 2015
- Urbis Economic and Social Impact Assessment (February 2016)

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12 February 2016

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Dear Mr Wynne

Sydney Zoo - State Significant Development (SSD 7228)

We refer to the State Significant Development Application (SSD 7228) (**DA**) lodged by Sydney Zoo Pty Limited which seeks development consent for Sydney Zoo, at Bungarribee Park, Western Sydney Parklands (**the Project**).

Gilbert and Tobin has been asked to advise on the following matters:

- the correct application of the words 'social and economic impacts in the locality' for the purposes of section 79C(1)(b) of the *Environmental Planning and Assessment Act 1979* (NSW) (**EP&A Act**); and
- whether the Environmental Impact Statement prepared by JBA Urban Planning Consultants Pty Ltd dated December 2015 (**EIS**) has validly assessed 'social and economic impacts in the locality' for the purposes of section 79C(1)(b) of the EP&A Act.

Summary

- A. It is beyond doubt that section 79C(1)(b) of the EP&A Act requires the consent authority to take into account the social and economic impacts in the locality that would arise given the subject of the development application.
- B. The EIS has not validly assessed the social and economic impacts in the locality for the purposes of section 79C(1)(b) of the EP&A Act.
- C. The EIS should be considered invalid for the purposes of the EP&A Act. This is so, including for the following reasons:
 - (i) The EIS does not address the requirements of the Secretary's Environmental Assessment Requirements (**SEAR**), notwithstanding the express direction given to the Applicant to do so;
 - (ii) The Economic Impact Assessment prepared by KPMG does not respond to the issues which were directed to be responded to by SEAR. Indeed, the KPMG report includes no identification of the existence of Featherdale at all; and

- (iii) The EIS and the Economic Impact Assessment contains statements which are unresearched, unsubstantiated and inaccurate.

D. In the circumstances above, and set out in more detail in the supporting documentation, there could be no rational, logical or reasonable basis upon which a consent authority could decide to approve the DA. Elanor should specifically reserve its rights in relation to any decision.

1 Are 'social and economic impacts in the locality' a relevant consideration in determining the DA?

Section 79C(1)(b) of the EP&A Act requires a consent authority to take into consideration 'the likely impacts of that development, including ... social and economic impacts in the locality' if such impacts are of 'relevance' to the development the subject of a development application.

Case law provides that in order to be 'relevant' for the purposes of section 79C(1)(b) of the EP&A Act, the impact must be one which has a real chance or possibility of occurring, and which may reasonably be a consequence of the development.

The Urbis Report concludes that the Project is likely to give rise to a number of material 'social and economic impacts in the locality'. In light of the findings in the Urbis Report, it is our view that section 79C(1)(b) of the EP&A Act would operate to require the consent authority to take into consideration 'social and economic impacts in the locality' flowing from the Project in determining the DA in accordance with the EP&A Act.

2 What is the meaning of the words 'social and economic impacts in the locality'?

Case law provides the following key legal principles in relation to the correct application of the words 'social and economic impacts in the locality' for the purposes of section 79C(1)(b) of the EP&A Act:

- the impacts of a development on the economic viability of individual competitors is a relevant consideration if the impact is such as to have an overall adverse social and economic impact in the locality;
- the identification of the locality in which social and economic impacts are considered is solely a question of fact, the boundary of which will be influenced by the nature of the development and its impacts; and
- assessing the 'social and economic impacts' of a development is a complex task and may require consideration of a broad range of issues including, among other matters:
 - (i) impacts on the range, economic viability and adequacy of other businesses and facilities available in the locality;
 - (ii) impacts on the relations between people in their capacity as members of communities and their environment;
 - (iii) impacts on family, community and cultural traditions, lifestyles, recreational activities, values and historical associations in the locality; and

(iv) impacts on employment in the locality.

3 Has the EIS validly assessed 'social and economic impacts in the locality' for the purposes of the EP&A Act?

Case law provides that the purpose of an environmental impact statement is to bring matters to the attention of the public, the key government agencies and consent authority so that the environmental impacts of the proposed development can be properly understood. It should be specific enough to direct a reasonably intelligent and informed mind to the potential environmental consequences of carrying out the proposed development, and should not be superficial, subjective or non-informative.

The Urbis Report identifies a number of material deficiencies in relation to the assessment in the EIS of 'social and economic impacts in the locality' flowing from the Project. In particular the EIS has not adequately considered the fundamental issues that should form part of a valid assessment of 'social and economic impacts in the locality' flowing from the Project for the purposes of section 79C(1)(b) of the EP&A Act.

It is our opinion that the effect of the above material deficiencies in the EIS is that:

- the EIS has failed to bring 'social and economic impacts in the locality' to the attention of the public, the key government agencies and the consent authority so that such impacts can be properly understood; and
- the consideration of this issue in the EIS is superficial, subjective and non-informative.

In light of the above, and given the findings in the Urbis Report that the Project is likely to give rise to material 'social and economic impacts in the locality', we consider the omission of this significant merit issue is such as to invalidate the whole EIS for the purposes of the EP&A Act. In the absence of a valid EIS, the consent authority cannot lawfully determine the DA in accordance with the EP&A Act.

We are also of the view that, in the **complete absence of any probative evidence from the applicant** in relation to this issue, and based on Urbis' conclusion that the Project will give rise to unacceptable 'social and economic impacts in the locality', there would be **no rational, logical or reasonable basis upon which the consent authority could decide to approve the DA.**

Please contact Ben Fuller if you would like to discuss this advice.

Yours sincerely



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22 October 2015

Ms Krista Murphy
Communications Manager
JBA Urban Planning Consultants

Via email:

Stakeholder Consultation for the Proposed Zoo to be Located Within the Western Sydney Parklands ("Sydney Zoo")

We refer to your letter dated 6 October 2015 inviting us to make comments during this initial consultation phase regarding the SSD application to establish a new zoo (recreational facility) in the Western Sydney Parklands.

Elanor Investors Group (Elanor) is the owner and operator of the Featherdale Wildlife Park which is located at 217-229 Kildare Road, Doonside, being approximately 6 kilometres from the site of the proposed new zoo. Featherdale was established in 1972. Over its 43 years of operation, the Park has evolved into one of Sydney's most loved, privately owned wildlife parks. Featherdale is a well-established tourist attraction providing an important contribution to the Sydney day tour market, with over 362,000 annual visitations. Featherdale currently employs more than 80 staff and has over 40 volunteers at the Park.

Featherdale is the largest exhibitor of native Australian Fauna in the world, caring for over 1,700 birds and animals on site, with more than 300 species of birds and animals being on display, including some of Australia's most iconic animals. Featherdale cares for the largest collection of koalas in the state and is an industry leader in the medical care of the species.

Featherdale is home to some of Australia's most endangered species, featuring some species that are not found in any other zoological institution in the world. Featherdale's breeding and preservation program is world renowned, playing a vital role in many conservation efforts around Australia. In addition, by providing access for the study of key species by university and other major zoological institutions, the Park makes an invaluable contribution to the many challenges facing our native wildlife today. Featherdale is also the principal breeder in Australia of the endangered Tiger Quoll, and has exported the species to the USA, to establish a breeding group overseas. Featherdale is the only zoo with a permit to collect quolls from the wild to ensure that our breeding group is the most genetically diverse as is possible, so that they can be called on for planned captive releases back into the wild.



Featherdale has a strong commitment to animal and environmental education and runs a highly commended Schools Education Program onsite. **Featherdale specialises in educating school children on native Australian fauna, offering a hands on display with a range of species that is second to none.** The lessons conducted by Featherdale meet all syllabus requirements at both a state and federal level. The Wildlife Education Program is well established and very successful. The "Learning Burrow" is an open-air amphitheatre with seating for up to 90 students. The "Wildlife Wanderer" is Featherdale's mobile education program.

Featherdale have partnered with TAFE NSW and currently offers 40 positions every week to students for training and education (at no cost), in order to assist them on their chosen "Captive Animal Management" career path. Many of these volunteers have gained employment with us and with numerous other zoos across the country. The training students receive at Featherdale, given its collection, is viewed as being 'industry best practice'.

The Park has received many conservation and tourism recognitions over many years and notably is a finalist in this year's NSW Tourism Awards under the category of 'Major Tourist Attractions'.

The proposal to develop a new zoo at the Western Sydney Parkland site raises significant concerns which are required to be addressed in detail in the EIS and in the determination of this application.

Specifically, we are concerned that the establishment of a new zoo in such close proximity to Featherdale will undermine the commercial feasibility and therefore justification of the proposal and will result in a range of undesired social and economic impacts on the long established operation at Featherdale.

We submit, therefore, that the EIS must provide a comprehensive social and economic impact analysis, that addresses both the viability of the project (having regard to the proposed zoo's very close location to Featherdale), as well as an assessment of the impacts on the operations of Featherdale. We request that this analysis be conducted by experienced and respected consultants and that the findings of this research be shared with us prior to completion and inclusion in the EIS.



Finally we advise that we reserve the right to make submissions on this and other issues during the formal exhibition process.

Please contact me if you have any questions.

Yours sincerely

A handwritten signature in black ink, appearing to read "Glenn Willis".

Glenn Willis
Elanor Investors Group



Economic & Social Impact Assessment

Sydney Zoo SSD 7228

February 2016

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Princess Ventura
Associate Director	Kylie Newcombe, Daniel Collins
Consultant	Katie Inglis, Chinmay Chitale
Job Code	EMR0409
Report Number	V4

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Executive Summary

Urbis has been commissioned by Elanor Investors Group (EIG) to assess the potential economic and social impact of the proposed Sydney Zoo on Featherdale Wildlife Park and the broader community.

The key findings are as follows:

DEFICIENCIES IN ECONOMIC AND SOCIAL ASSESSMENTS

The materials that accompany the application to establish the Sydney Zoo do not adequately address the potential economic and social impacts that would be generated by the proposal on the immediate and broader locality.

1. The documentation that accompanies the application for the Sydney Zoo does not include:
 - Detailed **business case** to demonstrate the viability of the Sydney Zoo development and its likely source of patronage
 - A balanced **economic impact assessment** that considers both the positive and negative impacts of the development on the immediate and broader locality
 - A comprehensive **social impact assessment** that considers both the positive and negative impacts of the development on the immediate and broader locality.
 - Whilst the Environmental Impact Statement (EIS) attempts to describe the differing nature of the Featherdale Wildlife Park and the Sydney Zoo facilities, the EIS does not take into consideration the timing of procurement of exotic animals and therefore does not take into consideration the likelihood that in the first two to three years, the Sydney Zoo may operate with only limited exotic animals and mostly native animals. Therefore, providing similar experiences and sourcing patronage from similar markets as Featherdale.
2. A business case was not made available as part of the application to establish a new Sydney Zoo. The KPMG report assumption that the **Sydney Zoo will attract some 888,000 visitors per annum appears unrealistically high** when considering that the proposed zoo is only 6 km from the Featherdale Wildlife Park which received some 384,000 visitors in FY14/15.
3. The extent of the **contribution of the Sydney Zoo to the NSW economy has been over-stated in the KPMG Economic Report** that accompanied the application for the following key reasons:
 - The KPMG report unrealistically assumes that all Sydney Zoo visits will be new whereas a notable share of these visits will be diverted from existing facilities, particularly nearby Featherdale Wildlife Park.
 - A further assumption made in the KPMG report is that all non-resident zoo visitors would extend their trip to spend an extra half day in Sydney to visit the Sydney Zoo. However, the report does not provide evidence to support this claim.
 - One of the specification criteria for focus group respondents, conducted as part of the Urbis study, is that they hosted interstate or overseas visitors in the past 12 months. Focus group respondents were asked if they could see their visitors extending their stay to visit the Sydney Zoo. Nearly all respondents said this is unlikely since the duration of visits is fixed. Respondents noted that tourists strive to plan their itinerary efficiently, and thus seek attractions within close proximity of other attractions. Based on this insight it seems unlikely that non-local zoo visitors would spend an extra half day in Sydney to visit Sydney Zoo.
 - Analysis of the length of stay of visitors in the different states across Australia clearly shows no relationship between the number of days visitors spend in a state and the number of animal attractions.

POTENTIAL ADVERSE ECONOMIC IMPACTS ON FEATHERDALE

4. **The extent of the impacts the Featherdale Wildlife Park is likely to sustain from the Sydney Zoo can potentially lead to its closure.**

- The Sydney Zoo can potentially result in a substantial contraction in the size of the Featherdale Wildlife Park catchment such that even with population and tourism growth, Featherdale will have access to -80% to -91% less catchment residents and visitors in 2017 compared to today.
- The Sydney Zoo can substantially reduce the annual visitation at Featherdale Wildlife Park by as much as -50% to -84%.
- The proposed Sydney Zoo is too close to Featherdale. Therefore, even after allowing for population and visitation growth, the catchment resident and visitor population to the area may be insufficient to be able to sustain both the Featherdale Wildlife Park and the Sydney Zoo.

5. **Workers at the Featherdale Wildlife Park tend to come from lower socio demographic areas.** Therefore, any employment lost that Featherdale sustains from the Sydney Zoo would be borne by those who can least afford it.

SIGNIFICANT SOCIAL AND ECONOMIC IMPACT ON THE COMMUNITY

6. **The closure of Featherdale Wildlife Park would result in a number of extensive negative social and economic impacts on the local and broader community.**

The high-profile, well-established and highly regarded Featherdale Wildlife Park provides substantial social and economic benefits to the community through a range of education and workplace programs, programs to increase awareness and social interaction with the community, and the care and support for native and endangered animal populations.

The closure of the well-established Featherdale Wildlife Park would have considerable negative social and economic impacts on the local community, and will result in a number of negative and potentially irreversible impacts on the broader Australian, animal conservation efforts.

- The closure of Featherdale would result in the loss of important, well established educational programs. Many of these programs are unique and could not be easily replaced or replicated. These impacts would be immediate and wide ranging for students and schools across the region.
- The closure of the Park would also have a negative impact on the social interaction with the community, reducing access to native wildlife and understanding of issues associated with their conservation. It would also remove valuable support and enjoyment provided to charities, schools and those in need within the community.
- The closure of the Wildlife Park would have a sizable impact on the support for native wildlife, in particular endangered species. The services the Wildlife Park currently provides, at its own cost, including the support for injured wildlife through the Wildlife Clinic, are important and unlikely to be duplicated by new facilities. Also the closure of the Park would have a substantial impact on the current breeding program and the support the Park provides to the conservation of endangered species.

7. **There is currently insufficient evidence to demonstrate that the 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.** The transitional and displacement impacts which could occur as a result of the closure of Featherdale Wildlife Park and the establishment of Sydney Zoo would be extensive and detrimental to the community.

Introduction

Urbis has been engaged by Elanor Investors Group (EIG) to look at the potential economic and social impacts of the proposed Sydney Zoo, particularly on the Featherdale Wildlife Park.

Our report utilises the following analysis:

- Review of the documents that accompany the State Significant Development Application SSD 7228 to establish a new Sydney Zoo
- Four focus groups comprising the following:
 - Featherdale customers who live within a 20 minute drive of the Sydney Zoo
 - Featherdale customers who live further afield
 - Families who have visited another zoo or a major animal attraction in Sydney over the past 12 months and who live within a 20 minute drive of the Sydney Zoo
 - Families who have visited another zoo or a major animal attraction in Sydney over the past 12 months and live further afield.

More detailed information on the approach and coverage of the focus groups is provided in Appendix B

- Economic impact modelling
- Social impact assessment.

OVERVIEW OF THE PROPOSED SYDNEY ZOO

A new zoo is proposed in Western Sydney. The site for the proposed Sydney Zoo is located approximately 33 kms west of the Sydney CBD, and approximately 15 kms east of Penrith. The proposed site sits within the Bungarribee precinct of the Western Sydney Parklands, with frontage to the Great western Highway at Eastern Creek.

Based on the Environmental Assessment Report prepared by JBA, the new zoo is proposed to contain animal exhibits over an area of approximately 16.5 ha with the following features:

- Up to 60 animal species
- Customer service areas including gift shops, restaurants, cafes, kiosks and amenities
- Show arena, picnic areas, wetlands, waterways and gardens
- Service areas including administration, and spaces for curating, food preparation and veterinarian uses
- Main car park for 800 vehicles with overflow provision.

The vision is to create a safari-like experience with water features and tree-lined fences to obscure the barriers between animal enclosures and recreate authentic looking habitats. The centre of the zoo will contain 'The Waterhole', which will act as the hub of the exhibition. Here people can rest, have lunch and picnic with elephants and hippos just metres away. From this central point, people can choose to visit the various sections of the zoo such as Big Cats, Elephants, African Grasslands or Australian Wildlife etc.

OVERVIEW OF THE FEATHERDALE WILD LIFE PARK

Featherdale Wildlife Park is located in the western Sydney suburb of Doonside, approximately 40 kms from the Sydney CBD, and approximately 6 kms from the proposed Sydney Zoo site.

Featherdale Wildlife Park has been in operation for over 40 years and in that time has built a reputation for showcasing an extensive range of native Australian animals in a caring environment.

The Park is the largest exhibitor of native Australian fauna in the world caring for over 1,700 birds and animals on site. There are over 300 species of animals on display including Australia's most iconic, such as the koala and kangaroo. Featherdale Wildlife Park is also home to some of Australia's most endangered species, and through its breeding and preservation program plays an important conservation role.

In the focus group discussion, the sentiment towards Featherdale Wildlife Park is very positive and it is apparent that the Park is highly regarded. Families rate highly the interactive experience describing it as a rare opportunity to get close to the animals. One of the key reasons families choose Featherdale Wildlife Park is that they can feed the animals which makes this a special and personal experience. Other positive features identified by the focus group respondents include:

- Affordable ticket prices and fee parking (relative to Taronga Zoo and other animal attractions)
- Natural look and feel of enclosures, thus feel like a natural habitat
- The high calibre of staff – described as warm, friendly and caring
- The animal curator talks and associated education benefits
- The compact size makes it easy to navigate
- It is relaxing because it doesn't have the crowds of Taronga Zoo
- Proximity from home (for Western Sydney residents).

Based on families' perceptions of Featherdale Wildlife Park (explored in the focus groups), the following values are associated with it:

- Caring
- Education
- Family
- Conservation
- Integrity.

“Featherdale is simple and easy, and I like that it is not commercial.”

REPORT STRUCTURE

The rest of the report is organised as follows:

- **Section 1:** Reviews the adequacy of the materials that accompany the State Significant Development Application SSD 7228 to establish a new Sydney Zoo in terms of assessing economic and social impacts.
- **Section 2:** Assesses the potential economic impact of the proposed Sydney Zoo on the Featherdale Wildlife Park
- **Section 3:** Assesses the potential social and economic impact of the proposed Sydney Zoo for the local and broader community.

1 Deficiencies in Economic and Social Assessments

The material that accompany the application to establish a new Sydney Zoo does not adequately address the potential positive and negative economic and social impacts that may result as part of the proposal on the immediate and broader locality.

1.1 ANALYSIS NOT CONDUCTED

The documentation that accompanies the application to establish a new Sydney Zoo does not include:

- Detailed **business case** to demonstrate the commercial viability of the Sydney Zoo development and its likely source of patronage
- A balanced and complete **economic impact assessment** that considers both the positive and negative impacts of the development on the immediate and broader locality
- A comprehensive and balanced **social impact assessment** that considers both the positive and negative impacts of the development on the immediate and broader locality.

1.2 DEFICIENCIES IN IMPACT ANALYSIS CONDUCTED

The Sydney Zoo application is accompanied by an Environmental Impact Statement (EIS) which includes a Socio-Economic Impact Assessment. However this assessment has some fundamental deficiencies that make it difficult to ascertain the potential extent of the likely positive and negative economic and social impacts of the proposed development.

ECONOMIC CONTRIBUTION OF THE SYDNEY ZOO OVERSTATED

The Economic Impact Assessment prepared by KPMG (October 2015) accompanying the application to establish a new Sydney Zoo is considered deficient.

The Sydney Zoo is forecast by the KPMG report to make a substantial ongoing contribution to the wider NSW economy of around \$45 million per annum, possibly increasing to as much as \$80 million per annum if the High Case assumptions are reached. However, the extent of the contribution of the proposed Sydney Zoo to the NSW economy has been over-stated for the following key reasons:

1. The KPMG report assumes that the Sydney Zoo will attract some 888,000 visitors per annum to comprise of 710,000 NSW residents and 193,000 interstate and international visitors. However, the report does not provide evidence on the basis of this forecast visitation numbers. The forecast visitation numbers for the Sydney Zoo appear bullish given that the proposed zoo is only 6 km from the Featherdale Wildlife Park which receives much lower annual visitation of some 384,000 visitors in FY14/15.
2. The KPMG report unrealistically assumes that all visits that will be generated by the proposed Sydney Zoo will be new whereas in actuality a sizeable share of these visits will be diverted from existing facilities including the Featherdale Wildlife Park.
3. A further assumption made in the KPMG report is that all non-resident zoo visitors would increase their trip time to spend an extra half day in Sydney to visit the Sydney Zoo. However, the report does not provide any evidence to support this claim.

Contrary to the KPMG report assumption, the new Sydney Zoo is unlikely to elicit more frequent visits. Instead it is more likely to redirect a substantial proportion of visits from the Featherdale Wildlife Park towards the new zoo.

One of the specification criteria for focus group respondents is that they had hosted friends or relatives from either interstate, or overseas in the past 12 months. This is an important requirement since it provides insight into the drivers and behaviour of tourists when visiting Sydney.

Most respondents had overseas visitors in the past 12 months, and said their guests prioritised harbour and beach experiences, and for contrast, the Blue Mountains. The main attractions mentioned include Sydney Opera House, Sydney Harbour Bridge, Darling Harbour and Taronga Zoo. For some international tourists, authentic Australian animal experiences are important which drives visitation to Featherdale Wildlife Park.

Focus group respondents were asked if they could see their visitors and tourists extending their stay in Sydney to visit the Sydney Zoo. Nearly all respondents said this is unlikely since the duration is fixed. Furthermore, many would still prefer to take their visitors to Taronga Zoo because of the total experience, which offers not only animals but the harbour, sightseeing and the ferry if accessing the zoo via the water. For an intimate experience with native Australian animals they would direct visitors towards Featherdale Wildlife Park. This view did not vary between focus group respondents who lived within Western Sydney, and those living outside the catchment.

Based on the above insights it seems unlikely that non-local zoo visitors would spend an extra half day in Sydney to visit Sydney Zoo, an assumption made by KPMG in the economic benefits study. Another factor for consideration is that often tourists strive to plan their itinerary efficiently, and thus seek attractions within close proximity of other attractions. Sydney Zoo is not within close proximity of key Sydney attractions, making this virtually a stand-alone destination. However, it is conceivable that visitors staying with friends or relatives in Western Sydney for an extended period of time may visit Sydney Zoo, or they have visited Taronga Zoo previously and looking for a different experience.

“If I was going to show off my city I would choose Taronga for the harbour, and not drive an hour”

“They wouldn’t come out this way for the zoo. There is nothing else out here”

4. Chart 1.2 shows the average length of stay of international and interstate visitors in the different states across Australia along with the number of zoos, wildlife park and other animal attractions in each state. The chart clearly shows no direct relationship between the average number of days visitors stay in the state and the number of animal attractions.
5. Chart 1.3 shows the proportion of interstate visitors in each State who visited a zoo or animal attraction and Chart 1.4 shows the proportion of international visitors in each State who visited a zoo or animal attraction. Both Charts 1.3 and 1.4 shows that there is no clear link between the number of zoos and animal attractions in the state and the proportion of visitors who visit them. Thus, suggesting that there is no basis for the KPMG assumption that interstate and international visitors who will visit the Sydney Zoo will stay in Sydney by half a day longer than other visitors.

INADEQUATE CONSIDERATION OF SOCIAL IMPACTS ON LOCALITY

The documentation provided as part of the application to establish a new Sydney Zoo does not include a Social Impact Assessment (SIA) of the proposed Zoo development. The application is accompanied by an Environmental Impact Statement (EIS) which includes a Socio-Economic Impact Assessment. However this assessment does not adequately address the potential positive and negative social impacts that may result as part of the proposal on the locality.

Appendix A at the end of this report provides an overview of the methodology and scale of a Social Impact Assessment which should have been conducted to assess the potential impact of the Sydney Zoo application.

The SEARs request also requires the EIS to describe the *“likely interactions between the development and any existing approved and proposed operations in the vicinity of the site”*. The EIS submitted does not adequately address the interaction between the proposed development and the Featherdale Wildlife Park with respect to social impacts.

Whilst the EIS attempts to describe the differing nature of the two facilities, it does not take into consideration the reality of the timing of procurement of exotic animals (2-3 years depending on the type of animal) and therefore does not take into consideration the likelihood that in the first couple of years,

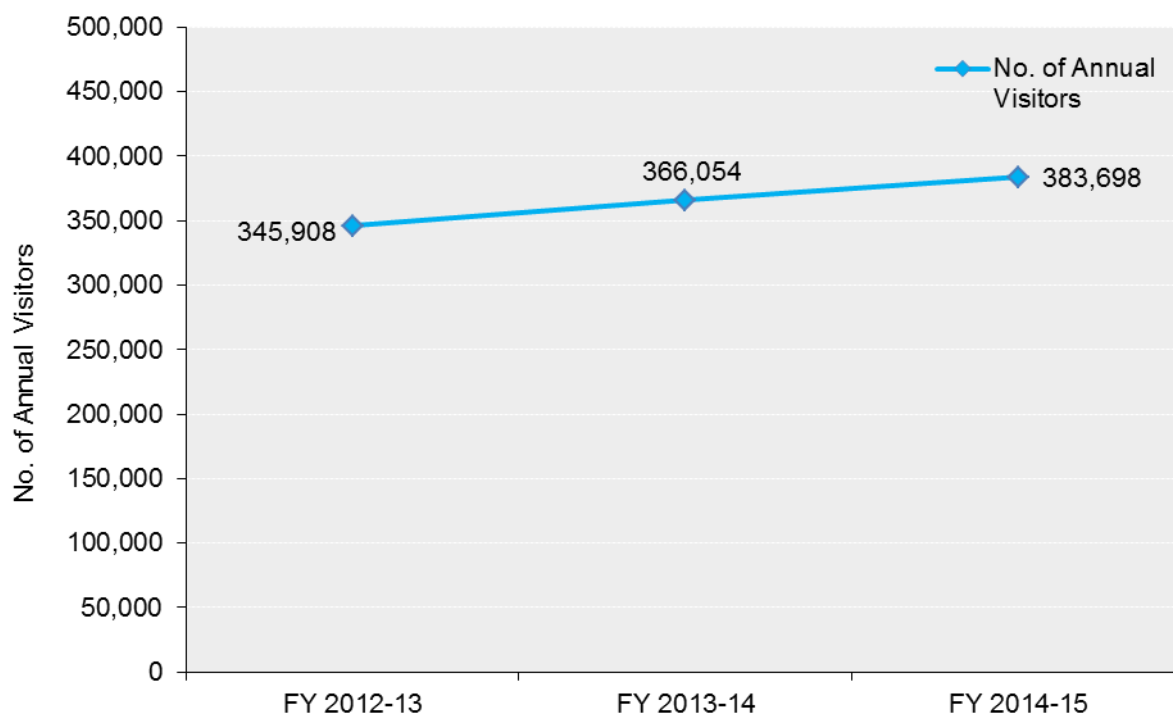
Sydney Zoo may operate with only limited exotic animals and mostly native animals, and therefore will, in contrast to the statements made within the EIS, provide similar experiences for guests and source patronage from similar markets.

The EIS states that *“The Zoo will provide educational opportunities for the growing population of Western Sydney, which currently suffers for a lack of easy access to such offerings, particularly at the scale proposed by Sydney Zoo”*. This statement does not consider the unique, and long established, educational opportunities currently provided by Featherdale Wildlife Park.

Annual Visitation

FEATHERDALE WILDLIFE PARK

CHART 1.1

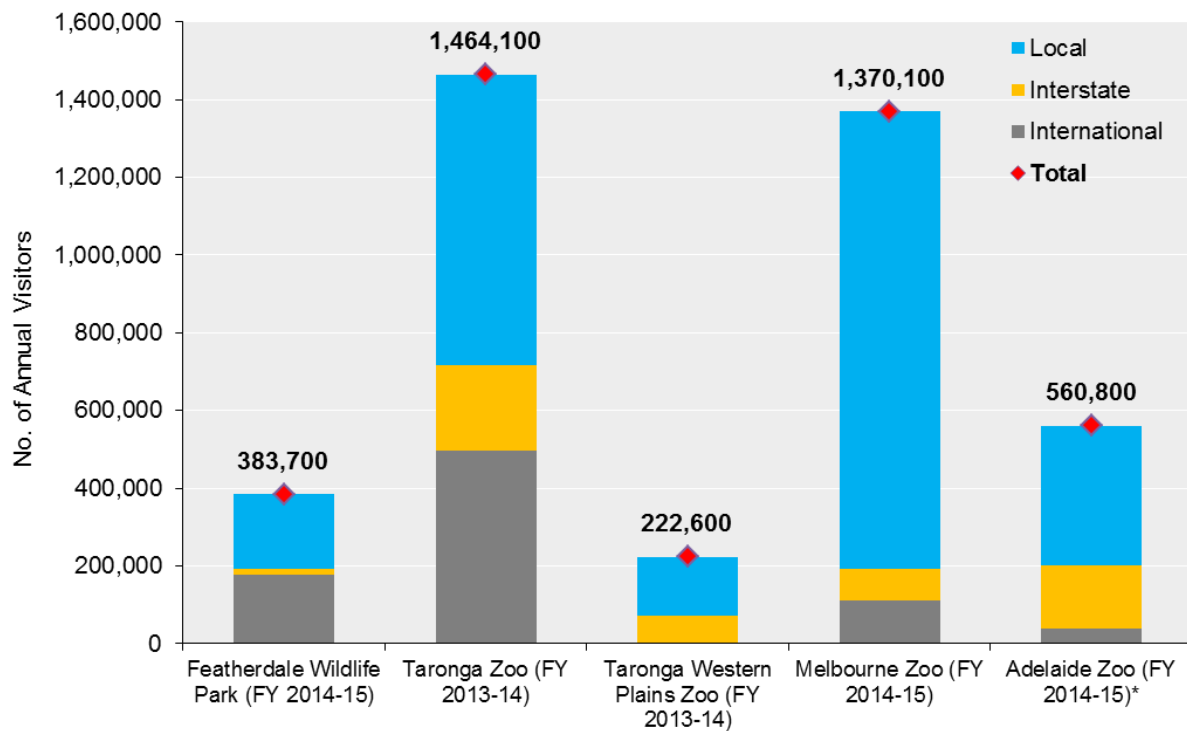


Source: Featherdale Wildlife Park, Urbis

Annual Visitation Breakdown

FEATHERDALE WILDLIFE PARK AND VARIOUS ZOOS

CHART 1.2

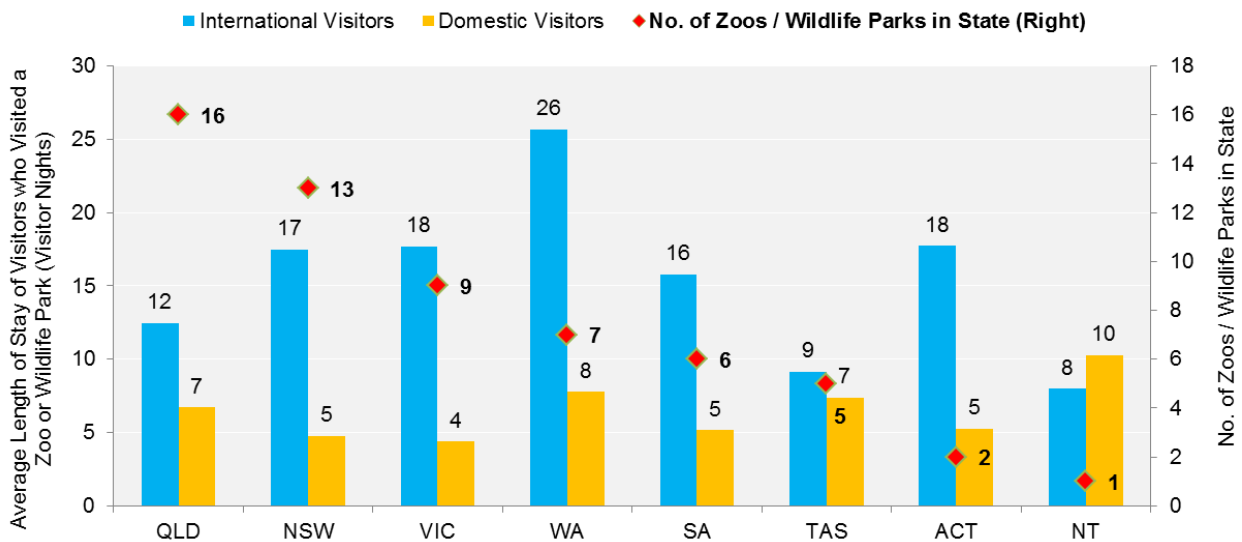


*The FY 2010-11 Visitor Breakdown has been applied to the FY 2014-15 Total Annual Visitation
Source: Featherdale Wildlife Park, Urbis

Average Length of Stay vs. No. of Zoos / Wildlife Parks in State

INTERNATIONAL VISITORS, 2014

CHART 1.3

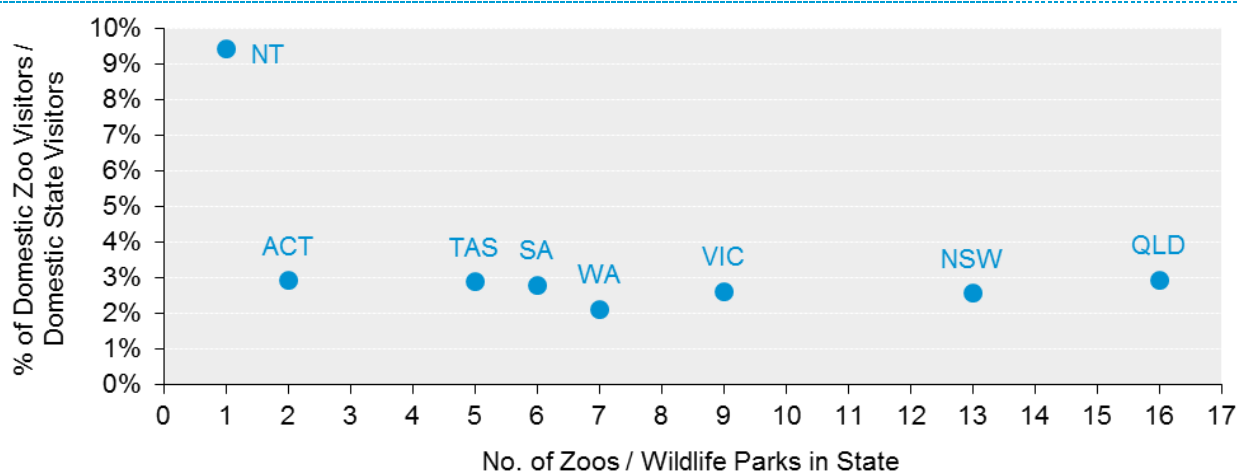


Source: Tourism Research Australia, Urbis

Zoo Visitation vs. No. of Zoos / Wildlife Parks in State

INTERSTATE VISITORS, 2014

CHART 1.4

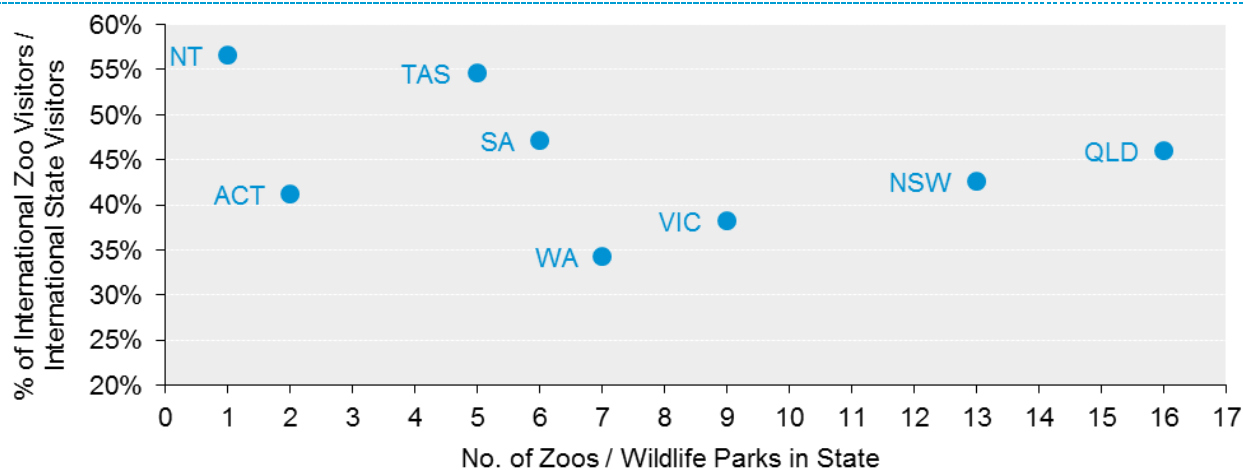


Source: Tourism Research Australia, Urbis

Zoo Visitation vs. No. of Zoos / Wildlife Parks in State

INTERNATIONAL STATE VISITORS

CHART 1.5



Source: Tourism Research Australia, Urbis

2 Potential Economic Impact on Featherdale

The proposed Sydney Zoo can have a significant detrimental economic impact on the Featherdale Wildlife Park and can potentially undermine the commercial viability of the park.

The catchment resident population and visitors to the area are unlikely to be of a sufficient size to be able to sustain both the Featherdale Wildlife Park and the Sydney Zoo given the relatively infrequent nature of visits to animal attractions. Further, contrary to the claims of the Sydney Zoo, the proposed zoo is unlikely to induce an extension in the period of visit in NSW.

2.1 RESULTS OF FOCUS GROUPS

Drivers to visit zoos and animal attractions were explored in the focus groups. Based on our understanding of those, the main factors that could result in a potentially negative impact on the future usage of Featherdale Wildlife Park are:

- Proximity – respondents confirmed that proximity is a driver in the decision making around visiting animal attractions
- Offer – the type of offer is a reason to visit animal attractions, families will be attracted towards the Sydney Zoo over Featherdale Wildlife Park because of the variety of international species
- Budget – families are often budget conscious and would therefore be unlikely to visit two animal attractions within the same period
- Amenity – the quality and availability of amenity is a driver to visit, and limited amenity at Featherdale Wildlife Park will put it at a disadvantage to the new Sydney Zoo which promises extensive amenity.

The frequency of visiting Featherdale Wildlife Park among respondents who live in Western Sydney is higher when compared to respondents who live outside the catchment. Furthermore, respondents outside the catchment cited distance as one of the reasons they had not visited Featherdale Wildlife Park, or had not visited for a long time. Together, this suggests that proximity to Featherdale Wildlife Park is a factor that drives visitation. Applying this understanding to the future usage of Sydney Zoo, **it is reasonable to believe that residents' proximity to Sydney Zoo will be a factor in driving visitation to the new zoo, and diverting their visits away from the Featherdale Wildlife Park.**

Focus group participants responded very positively to the Sydney Zoo concept. They were attracted to the idea of the safari-like experience, and in general the promise of somewhere new and exciting to visit. Following their initial reaction, respondents started to think about the impact on Featherdale Wildlife Park. They assume that **people will be more attracted to a new and exciting attraction over something that is old and established**, i.e. Featherdale Wildlife Park. Although the majority recognise that Featherdale Wildlife Park is special because of the interactive experience. The following comments were made in response to the Sydney Zoo concept:

“It sounds awesome”

“I would be excited to take my kids to Sydney Zoo”

In the focus groups all respondents were asked **‘does the new Sydney Zoo sound more or less attractive than Featherdale Wildlife Park, or the same?’** A summary of the responses are provided below:

- Featherdale customers (visited in the last 12 months) – majority found Sydney Zoo more attractive
- Non-Featherdale customers (not visited in the last 12 months) – approximately half found Sydney Zoo more attractive, the other respondents found it neither more, or less attractive
- Western Sydney residents – all respondents found the Sydney Zoo more attractive

- Beyond Western Sydney residents – approximately half found the Sydney Zoo more attractive.

The above summary shows that loyal customers who live in the catchment are more likely to be attracted to the Sydney Zoo compared to those who live outside the catchment and are not customers of Featherdale Wildlife Park. This indicates that Featherdale Wildlife Park is more vulnerable to lost patronage amongst its core geographic customer base. 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.

Non-core customers, i.e. those who live beyond the Western Sydney catchment indicated they prefer Taronga Zoo over the new Sydney Zoo, partly because distance is a disincentive to visit.

When examining impact, another consideration is the number of visits families make to animal attractions. **Such visits to zoos or animal parks are typically infrequent and for some families occur only once or twice a year**, and this often coincides with school holidays. The low usage is partly determined by the high cost associated with visiting attractions such as Taronga Zoo and SeaLife Aquarium, but also about not overdoing animal attractions when there are so many other attractions and activities to do. Consequently, the new Sydney Zoo will provide another option and Featherdale Wildlife Park will compete with it and the other existing animal attractions for a share of this market.

“There are only so many times a year you would go to a zoo or animal park”

Focus group respondents made comments that Featherdale Wildlife Park does not have the amenity that Taronga Zoo has such as playgrounds, a variety of food, quality food options and picnic spots. While respondents appreciate that Featherdale Wildlife Park is on a different scale and cannot provide to this level, 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.

In the focus groups, respondents were asked **about the likely impact on Featherdale Wildlife Park if the new Sydney Zoo opens**. Verbatim responses to that question are shown below.

“There is no doubt people will try Sydney Zoo initially”

“It is going to have a huge impact on Featherdale Wildlife Park in the first year”

“It will impact more on Featherdale Wildlife Park than Taronga because it is closer”

“It would be a huge financial loss for Featherdale Wildlife Park. They would probably have to close”

It is important to note also that respondents made comments about the impact prior to the question on impact being asked by the moderator, therefore indicating the impact is top of mind. The following comments are a selection of those top-of-mind comments.

“Are they going to blow Featherdale out of the water?”

“What will happen to Featherdale?”

“I think Featherdale Wildlife Park will be under pressure because it’s very close to the new zoo and it’s going to be new and an exciting place.”

“They are both in the same area. You would try the new place first”

Another potential impact factor is if Sydney Zoo provides an interactive experience with native Australian animals, which would undermine Featherdale Wildlife Park’s most unique proposition.

“It might be devastating for Featherdale particularly if they open an Australiana interactive experience”

The comments indicate there is a care factor associated with Featherdale Wildlife Park and specifically the potential damage they could encounter from Sydney Zoo. Focus group respondents see Featherdale Wildlife Park as a small non-commercial type operation that will be forced to compete with a large scale commercial organisation.

“Featherdale Wildlife Park is like no other. It is going to be sad if elephants and lions take away from the little koalas”

“You hate to think that Featherdale is going to struggle. They just need to add something”

2.2 MODELLING OF POTENTIAL TRADING IMPACTS

As mentioned in Section 1, the documentation provided as part of the application to establish a new Sydney Zoo does not include a detailed Economic Impact Assessment (EIA) or Business Case of the proposed Zoo development. Thus, making a comprehensive economic assessment on the proposed development challenging.

This section utilises three approaches to model the potential extent of the economic impact the proposed Sydney Zoo may have on the Featherdale Wildlife Park, namely:

- Reduced size of catchment
- Reduced visitation assuming conservatively that the Featherdale Wildlife Park is able to maintain the same trade area after the Sydney Zoo but its market share is halved
- Reduced visitation assuming the Featherdale Wildlife Park is able to maintain the same market shares but applied to a reduced catchment area.

REDUCED SIZE OF CATCHMENT

Each Census Statistical Area 1 (SA1) across Australia has been ascribed to its closest zoo, wildlife park or animal attraction on the basis of drive time analysis. An exclusive drive time catchment was then defined for each attraction. The results for NSW are shown in Map 2.1 and Table 2.1.

The size and distribution of the resident population, and number of interstate and international visitors in 2014 for each exclusive drive time catchment per animal attraction were then tallied and shown in Tables 2.1 and 2.2 for all animal attractions across NSW.

Map 2.1, and Tables 2.1 and 2.2 show that currently the Featherdale Wildlife Park is the closest animal attraction by drive time to 30% of NSW residents, 10% of where NSW interstate visitors stay and 5% of where international visitors to NSW stay.

The Featherdale Wildlife Park is the closest animal attraction to 1.7 million NSW residents, 2.6 million interstate visitors and 206,000 international visitors.

However, when the drive time analysis is re-run for 2017 assuming the new Sydney Zoo is operational and taking into account Department of Planning and Environment official population growth projections and growth in visitors to NSW, Map 2.2 and Table 2.3 shows that on the basis of a drive time catchment, the Featherdale Wildlife Park will only be the closest animal attraction to 219,000 NSW residents, 239,000 interstate visitors and 40,000 international visitors.

On the basis of drive time defined exclusive catchments and due to proximity, Table 2.3 shows that the Sydney Zoo can reduce the Featherdale Wildlife Park Catchment Population by a substantial -80% to -91%.



Drive Time Based Market Catchment Population

NSW ZOOS AND WILDLIFE PARKS, 2014

TABLE 2.1

NSW Zoo / Wildlife Park	NSW Residents	Interstate Visitors	International Visitors	Total Zoo / Wildlife Park Catchment
Featherdale Wildlife Park	1,691,066	2,576,398	205,867	4,473,331
Taronga Zoo	263,649	707,012	150,406	1,121,066
Taronga Western Plains Zoo	243,724	2,151,215	41,932	2,436,870
WILD LIFE Sydney Zoo	333,142	5,449,472	2,639,715	8,422,329
Koala Park Sanctuary	780,442	1,056,709	235,729	2,072,880
Australian Reptile Park	405,182	1,542,898	42,929	1,991,009
Symbio Wildlife Gardens	522,799	1,261,748	75,354	1,859,901
Shoalhaven Zoo	118,888	1,272,036	43,971	1,434,895
Hunter Valley Zoo	589,558	2,938,777	134,913	3,663,248
Australia Walkabout Wildlife Park	13,089	44,577	2,000	59,666
Billabong Zoo	372,685	3,436,622	179,781	3,989,089
Mogo Zoo	90,833	1,562,973	50,681	1,704,486
Altina Wildlife Park	183,570	1,348,312	24,439	1,556,321
Total NSW Catchment	5,608,627	25,348,748	3,827,718	34,785,092

Source: Urbis

Distribution of NSW Residents by Drive Time

NSW ZOOS AND WILDLIFE PARKS, 2014

TABLE 2.2

NSW Zoo / Wildlife Park	NSW Residents	Interstate Visitors	International Visitors	Total Zoo / Wildlife Park Catchment
Featherdale Wildlife Park	30%	10%	5%	13%
Taronga Zoo	5%	3%	4%	3%
Taronga Western Plains Zoo	4%	8%	1%	7%
WILD LIFE Sydney Zoo	6%	21%	69%	24%
Koala Park Sanctuary	14%	4%	6%	6%
Australian Reptile Park	7%	6%	1%	6%
Symbio Wildlife Gardens	9%	5%	2%	5%
Shoalhaven Zoo	2%	5%	1%	4%
Hunter Valley Zoo	11%	12%	4%	11%
Australia Walkabout Wildlife Park	0%	0%	0%	0%
Billabong Zoo	7%	14%	5%	11%
Mogo Zoo	2%	6%	1%	5%
Altina Wildlife Park	3%	5%	1%	4%
Total NSW Catchment (%)	100%	100%	100%	100%
Total NSW Catchment (No.)	5,608,627	25,348,748	3,827,718	34,785,092

Source: Urbis

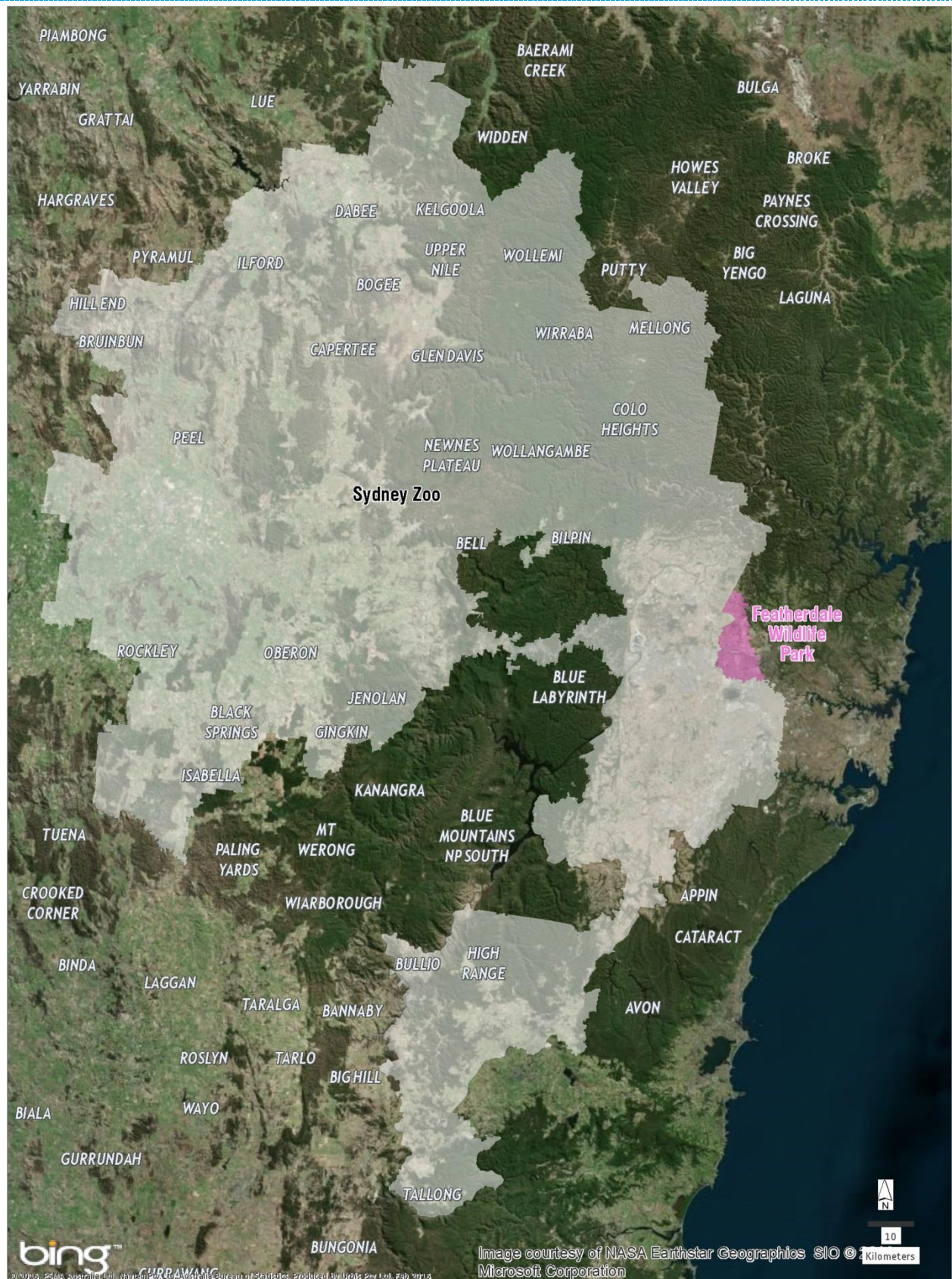
Featherdale Wildlife Park Market Catchment Impact

POST SYDNEY ZOO, 2017

TABLE 2.3

Market Catchment - Current (FY 2014-15)	NSW Residents	Interstate Visitors	International Visitors
Featherdale Wildlife Park	1,691,066	2,576,398	205,867
Market Catchment - Post Sydney Zoo (2017)			
Featherdale Wildlife Park	219,126	239,210	40,533
Sydney Zoo	1,490,750	2,819,912	175,451
Featherdale Wildlife Park and Sydney Zoo Catchment	1,709,876	3,059,121	215,984
Impact - Post Sydney Zoo			
Featherdale Wildlife Park Market Catchment (No.)	-1,471,940	-2,337,188	-165,335
Featherdale Wildlife Park Market Catchment (%)	-87%	-91%	-80%

Source: Urbis



VISITATION IMPACT – LOW CASE

Tables 2.4 and 2.5 show the potential impact of the Sydney Zoo on the Featherdale Wildlife Park if the Sydney Zoo does not reduce the Featherdale Wildlife Park catchment but instead results in the halving of the market shares it can generate from the same catchment area in future.

The 50% reduction in market shares is considered conservative given that results of the focus groups found that the majority of participants who live within Western Sydney expressed a high likelihood of visiting the Sydney zoo over Featherdale and visits to animal attractions tend to be quite infrequent for most families (once or twice a year).

The analysis shows that if the Featherdale Wildlife Park is able to draw from the same market catchment area but halve the market share it can generate of the 2017 markets (which accounts for growth in resident population and visitor numbers), then its annual visitation can reduce substantially from 384,000 per annum currently to 192,000, by 2017, a substantial -50% reduction on the Featherdale Wildlife Park's current annual visitation.

Featherdale Wildlife Park Visitation Impact - Low Case

POST SYDNEY ZOO, 2017

TABLE 2.4

Annual Visitation - Current (FY 2014-15)	Annual Visitation (No.)	Market Catchment (No.)	Market Share (%)
NSW Resident	190,702	1,691,066	11.3%
Interstate	14,845	2,576,398	0.6%
International	178,151	205,867	86.5%
Total	383,698	4,473,331	
Annual Visitation - Post Sydney Zoo	Market Share (%)	Market Catchment (No.)	Annual Visitation (No.)
NSW Resident	5.6%	1,691,066	95,351
Interstate	0.3%	2,576,398	7,423
International	43.3%	205,867	89,076
Total		498,868	191,849

Source: Urbis

Featherdale Wildlife Park Annual Visitation Impact - Low Case

POST SYDNEY ZOO, 2017

TABLE 2.5

	Annual Visitation (No.)
Current (FY 2014-15)	383,698
Post Sydney Zoo (2017)	191,849
Impact - Post Sydney Zoo	
Annual Visitation (No.)	-191,849
Annual Visitation (%)	-50%

Source: Urbis

VISITATION IMPACT – HIGH CASE

Tables 2.6 and 2.7 show the potential impact of the Sydney Zoo on the Featherdale Wildlife Park visitation if it is able to maintain the same market shares of the reduced catchment shown in Map 2.2.

The analysis shows that if the Featherdale Wildlife Park is able to maintain the same market share of its reduced catchment, annual visitation can potentially reduce from some 384,000 visits annually to 61,000 by 2017, a considerable -84% reduction on the Featherdale Wildlife Park's current annual visitation.

Featherdale Wildlife Park Visitation Impact - High Case

POST SYDNEY ZOO, 2017

TABLE 2.6

Annual Visitation - Current (FY 2014-15)	Annual Visitation (No.)	Market Catchment (No.)	Market Share (%)
NSW Resident	190,702	1,691,066	11.3%
Interstate	14,845	2,576,398	0.6%
International	178,151	205,867	86.5%
Total	383,698	4,473,331	
Annual Visitation - Post Sydney Zoo	Market Share (%)	Market Catchment (No.)	Annual Visitation (No.)
NSW Resident	11.3%	219,126	24,711
Interstate	0.6%	239,210	1,378
International	86.5%	40,533	35,076
Total		498,868	61,165

Source: Urbis

Featherdale Wildlife Park Annual Visitation Impact High Case

POST SYDNEY ZOO, 2017

TABLE 2.7

	Annual Visitation (No.)
Current (FY 2014-15)	383,698
Post Sydney Zoo (2017)	61,165
Impact - Post Sydney Zoo	
Annual Visitation (No.)	-322,533
Annual Visitation (%)	-84%

Source: Urbis

CONCLUSION

The extent of the economic impacts the Featherdale Wildlife Park is likely to sustain from the Sydney Zoo can potentially lead to its closure.

- The Sydney Zoo can potentially result in a substantial contraction in the size of the Featherdale Wildlife Park catchment such that even with population and tourism growth, Featherdale will have access to -80% to -91% less catchment residents and visitors in 2017 compared to today
- The Sydney Zoo can substantially reduce the annual visitation at Featherdale Wildlife Park by as much as -50% to -84%.

The proposed Sydney Zoo is too close to Featherdale. Therefore, even after allowing for population and visitation growth, the catchment resident and visitor population to the area may be insufficient to be able to sustain both the Featherdale Wildlife Park and the Sydney Zoo.

2.3 EMPLOYMENT IMPACT

Map 2.3 shows where Featherdale Wildlife Park employees live against the per capita income variation across Metropolitan Sydney.

Map 2.3 shows that more than half (53%) of Featherdale Wildlife Park workers live within the Blacktown LGA. The remaining workers are spread out throughout the Metropolitan Sydney area but with a high concentration within the Western Sydney Region. It also shows that Featherdale Wildlife Park workers tend to live in areas that are characterised by relatively lower per capita incomes.

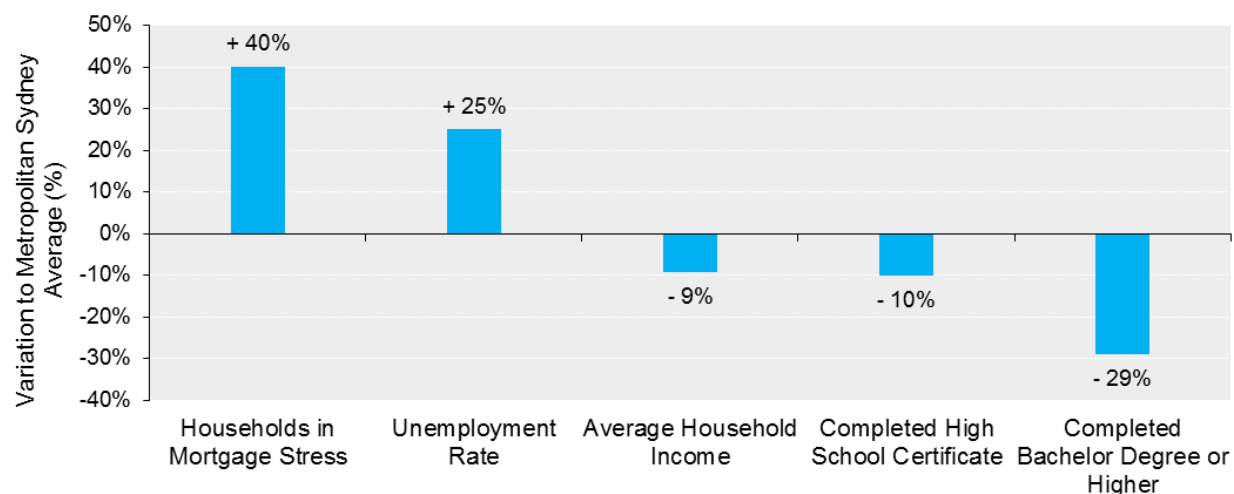
Chart 2.1 and Table 2.8 highlight the key socio demographic indicators that show the Blacktown LGA as a relatively lower socio demographic area compared to Metropolitan Sydney. The key findings include:

- Household purchasers in the Blacktown LGA are 40% more likely to experience mortgage stress. Mortgage stress equates to spending more than 30% of pre-tax income on home loan repayments.
- The 2011 unemployment rate for the Blacktown LGA (7.2%) was 25% higher than Metropolitan Sydney, and shows the relative scarceness of employment opportunities within the area.
- Blacktown LGA is characterised by relatively lower income households, with the average household income 9% below Metropolitan Sydney in 2011.
- Only 60% of high school students in the Blacktown LGA completed their High School Certificate in 2011, which is 10% below the Metropolitan Sydney average. This represents a greater proportion of high school students leaving after achieving their Record of School Achievement (Year 10 equivalent) and entering the workforce.
- Blacktown LGA has a lower proportion of residents (-29%) who have completed a Bachelor degree or higher at a tertiary institution.

Socio Demographic Characteristics – Blacktown LGA

VARIATION TO METROPOLITAN SYDNEY AVERAGE, 2011

CHART 2.1



Source: 2011 ABS Census, Urbis

Summary of Socio Demographic Characteristics

2011

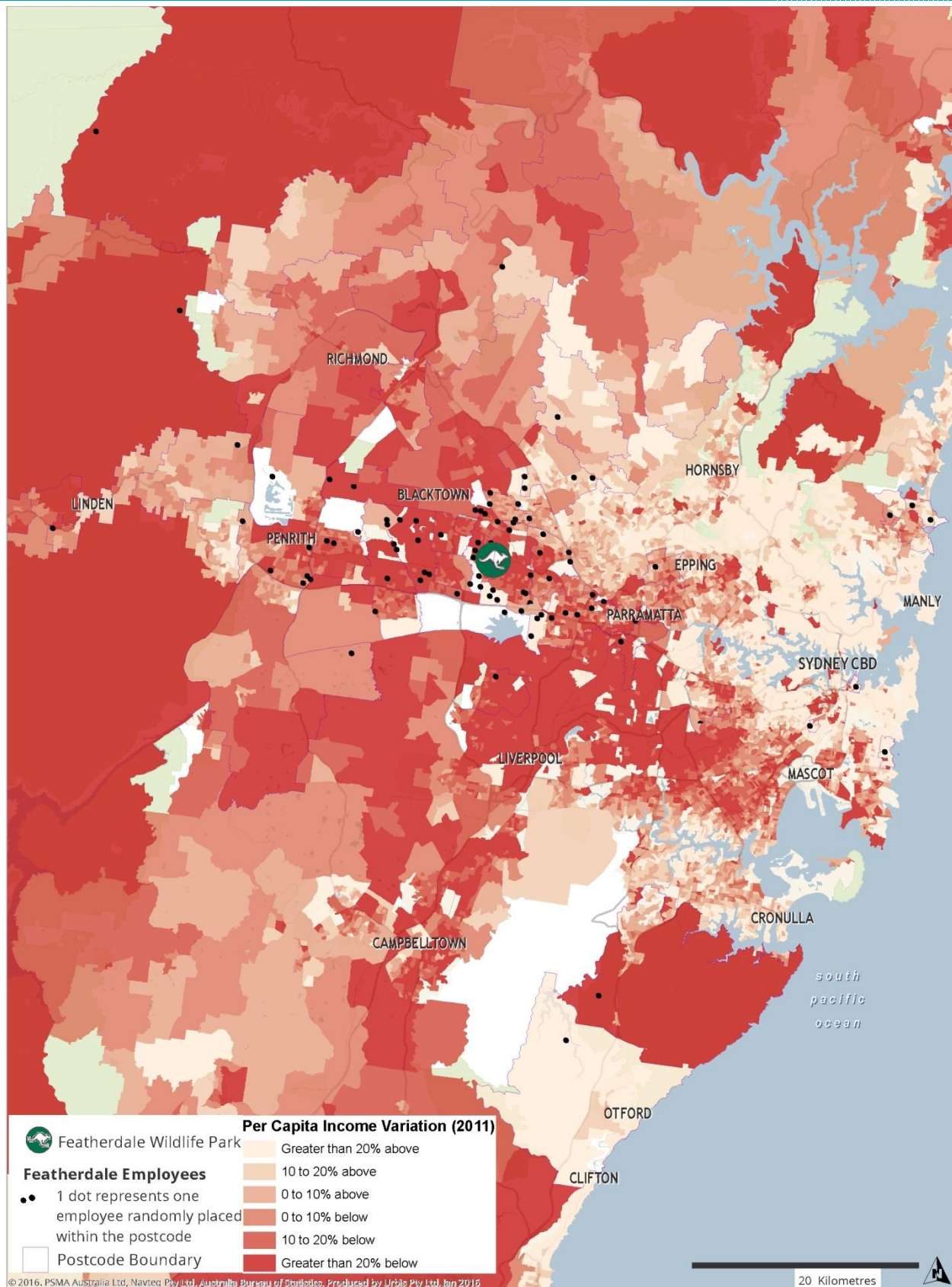
TABLE 2.8

INDICATOR	BLACKTOWN LGA	METROPOLITAN SYDNEY	VARIATION (%)
Households in Mortgage Stress	4.3%	3.0%	+40%
Unemployment Rate	7.2%	5.7%	+25%
Average Household Income	\$85,711	\$94,428	-9%
Completed High School Certificate	60.3%	67.0%	-10%
Completed Bachelor Degree or Higher	17.1%	24.1%	-29%

Source: 2011 ABS Census, Urbis

The potential loss of employment can have the following implications for current and future Featherdale Wildlife Park employees:

- Employees with a mortgage loan are more likely to experience financial stress, and may result in a reduced ability to service these loans in the future period. This will continue to place pressure on household budgets that cater for other living expenses.
- Employees may experience greater difficulty in finding future employment opportunities given the relatively high unemployment rate in the Blacktown LGA.
- A reduction in Featherdale Wildlife Park's employment can limit future employment opportunities within Blacktown LGA. The Park provides good employment opportunities in the Blacktown LGA, particularly for Year 10 High School leavers and university students without a bachelor degree that are seeking part time work.
- The findings therefore suggest that Featherdale Wildlife Park employees who reside in the Blacktown LGA if adversely impacted from any loss of visitation and employment are less likely than the average Sydney resident to be able to cope and bounce back. Therefore, any visitation and employment lost that Featherdale sustains from the new zoo would be borne by those who can least afford it.



Source: 2011 ABS Census, Urbis

3 Social and Economic Impacts on the Community

The following section presents a review of the current social and economic benefits associated with the Featherdale Wildlife Park, and considers the potential social and economic impacts should the parks operations be reduced or closed. This section also considers the potential impact of the Sydney Zoo in terms of its currently reported capacity to support social and economic benefits of the scale currently provided by Featherdale.

Table 3.1 presents the current activities undertaken at Featherdale Park and the associated social and economic benefits they provide to the community. The potential impacts of reduced operations or closure of the park is also considered.

Social Benefits and Impact Assessment

FEATHERDALE WILDLIFE PARK

TABLE 3.1

ACTIVITIES	DESCRIPTION	BENEFIT	POTENTIAL IMPACT
EDUCATION PROGRAMS			
Mobile education program	Known as the Wildlife Wanderer, the program involves keepers from the park attending local schools, aged care facilities, and to residents with limited mobility to provide an engaging education program.	Unique program of outreach support to both schools and disadvantaged local residents.	Loss of support to disadvantaged local residents.
Onsite education program	The park operates a school education program for students of all ages. Students are invited to the park and keepers provide a tailored learning program in the dedicated learning facility, called the Learning Burrow, which has capacity for approximately 90 students. The program is linked to relevant syllabus studies and currently serves kindergarten to second grade students. The park also provides specialised lessons in English learning, photography and statistical analysis. The Park can cater for up to 200 students per day during the summer months and services most schools across Western Sydney. The study of Native Endemic Animals is a key element of the Year 12 syllabus and the park is seeking to build off its existing relationships with local schools to broaden the take up of their education program to more primary and secondary students within the catchment.	Valuable syllabus linked education program for young students.	Should the program close, established connections to existing schools would be lost resulting in a negative impact on many schools and students across the region.
Work experience	The park provides work experience placements for six Year 10 students weekly in the areas of Business/Tourism, Retail and Administration, Horticulture or working with Captive Animals. In the last 15 years, Featherdale has provided vocational work placement opportunities for approximately 1,000 students, equating to a conservation in-kind contribution of over \$500,000 in supervision costs.	Provides valuable experience in employment to support future careers for young students.	Closure of the program would deprive students of a valuable opportunity to gain experience in a highly specialised and competitive field.
TAFE and Volunteer	The volunteer program has been established for over 8 years and currently supports 35 students from the	Provides a pathway to employment for	Closure of the program would

ACTIVITIES	DESCRIPTION	BENEFIT	POTENTIAL IMPACT
program	Richmond or Ultimo TAFE currently studying captive animal care courses. The program provides volunteers with over 15 hours per week of experience and training in the care and management of captive native animals. This training is a pre-requisite for students who must complete a practical element to allow completion of the course. This is therefore an essential service for students and can generally lead to direct casual or permanent employment with the Wildlife Park. Finally, the park has achieved accreditation to provide this service to TAFE students, which is unlikely to be replicated at new facilities.	TAFE students, as well as essential support to complete their TAFE course.	<p>result in students having to drop out of their TAFE course as this is an essential element.</p> <p>Not all facilities are accredited to undertake such training courses and it is unlikely this program could be replicated in a timely manner at other nearby facilities.</p>
COMMUNITY ENGAGEMENT AND INTERACTION			
Affordable interaction	Featherdale currently provides affordable social interaction. It is understood that the Sydney Zoo is being operated by the same company as Sydney Sealife Aquarium. Whilst price points for the Sydney Zoo tickets have not yet been decided, a single adult ticket to Sealife is \$40 and a child is \$28. By contrast Featherdale costs \$29.50 for adults and \$16 for children providing a much more affordable place for social and community interactions with wildlife.	Affordable social interaction with community and native animals.	Potential for increased prices for community interaction and entertainment with native wildlife.
Mobile native animal displays	Displays for schools, community gatherings, corporate functions and media events.	Increased community awareness and access to native animals.	The closure of Featherdale Wildlife Park would these existing and significant connections, relationships and activities with the community, which may not be replicated at any new facilities.
Community Engagement Days	Open days in conjunction with the local police and fire brigade to raise awareness about community safety.		
Wake Up with Wildlife	Provides 1,500 tickets to Blacktown residents for Wake Up with Wildlife program on Australia Day for a gold coin donation		
Love thy Neighbour	Provides free ‘Love thy Neighbour’ passes for unlimited visits to the park for immediate neighbours		
Ngallu Wal Aboriginal Child and Family Centre	Partnered with the Ngallu Wal Aboriginal Child and Family Centre to provide animal displays and free educational talks for their elder meetings.	Connectivity and support for Indigenous Australian community.	
Indigenous artists	Purchases products from local Indigenous artists for sale in the Souvenir Centre.		
Charities	Supports over 170 charities, community groups, schools and local businesses by providing free passes to be used as fund raising prizes.	Supporting charitable causes.	

ACTIVITIES	DESCRIPTION	BENEFIT	POTENTIAL IMPACT
NATIVE ANIMAL CONSERVATION			
Native animal collection	The park has one of the largest collections of native animals in Australia and is one of the only parks in NSW endorsed by the Australian Koala Foundation.	The park provides significant social value to the community through the care, management, and maintenance of healthy populations of native creatures.	Closure of the Park would have a significant impact on the existing collection of animals, including potential for relocation.
Featherdale Wildlife Clinic	Featherdale Wildlife Clinic supports approximately 1,000 sick, injured or orphaned animals that are bought in by the general public each year. The Park supports the National Park and Wildlife Services, police and other emergency services in the collection, care, and rehabilitation of injured native wildlife. This service is provided at the cost of the Wildlife Park and represents a significant investment from the Park in the care of native wildlife.		The Park currently provides a significant service, at its own cost, which may not be replicated by other facilities, and would result in a disturbance and potential loss of this important service.
Native animal conservation	Supports several animal conservation groups by providing animals for research, knowledge and consultation and funding important in situ research and development programs for endangered species. The Park also actively raises money to support native animals such as the Tree Planting Ceremonies to support Koala conservation.		The Parks focus is on the care and support for native and endangered species. Closure of the park could risk the success of native species populations in NSW.
Endangered species	The park holds and supports up to 25 endangered animals and supports breeding programs and release programs aimed at reviving populations of native animals such as the Tasmanian Devil.		
Zoo partnerships	The Wildlife Park works with other Zoos and the Zoological Society and supports other zoos across the world, such as San Diego Zoo.		The Park is active in the international community, and these connections could be lost should the Park close.

The Featherdale Wildlife Park provides considerable social and economic benefits to the community through a range of education and workplace programs, programs to increase awareness and social interaction with the community, and the care and support for native and endangered animal populations. The closure of the well-established Featherdale Wildlife Park would have extensive negative social impacts on the local community, and will result in a number of negative and potentially irreversible impacts on the broader Australian, animal conservation efforts.

The closure of Featherdale would result in the loss of meaningful, well established educational programs. Many of these programs are unique to Featherdale and could not be easily replaced or replicated within

new facilities. These impacts would be immediate and wide ranging, for students and schools across the region.

The closure of the Park would also have a considerable negative impact on the social interaction with the community, reducing access to native wildlife and understanding of issues associated with their conservation. It would also remove valuable support and enjoyment provided to charities, schools and those in need within the community.

Finally, the closure of the Wildlife Park would have a detrimental impact on the support for native wildlife, in particular endangered species. The services the Wildlife Park currently provides, at its own cost, including the support for injured wildlife through the Wildlife Clinic, are valuable and unlikely to be duplicated by new facilities. Also the closure of the Park would have a negative impact on the current breeding program and the support the Park provides to the conservation of endangered species.

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. In addition, the transitional and displacement impacts which could occur as a result of the closure of Featherdale Wildlife Park and the establishment of Sydney Zoo would be extensive and detrimental to the community.

Disclaimer

This report is dated February 2016 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Gilbert + Tobin (**Instructing Party**) for the purpose of assessing the potential economic and social impact of the Sydney Zoo (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendix A

Social Impact Assessment Criteria for Sydney Zoo

Given the size and nature of the proposal, an SIA should be prepared to assess the potential social impacts on the locality, including an assessment of the following:

- Peoples' way of life – how they live, work, play and interact with one another on a day-to-day basis
- Peoples' culture – their shared beliefs, customs, values and language or dialect
- The community – its cohesion and stability, character and services and facilities
- The population – increases or decreases in population numbers
- The political systems – the extent to which people are able to participate in decision that affect their lives
- The natural and built environment – the quality of the air and water people use; the availability and quality of the food they eat; the level of hazard or risk, dust and noise they are exposed to; the adequacy of sanitation, their physical safety, and their access to and control over resources
- Health and wellbeing - health is a state of complete physical, mental, social and spiritual wellbeing and not merely the absence of disease or infirmity
- Personal and property rights - particularly whether people are economically affected, or experience personal disadvantage
- Fears and aspirations and safety – perceptions of safety, fears about the future of a community, and aspirations for the future.

Key questions that should be considered within an SIA for a facility of this nature should include:

1. How does the facility interact with the community? What opportunities does the facility provide to the community (eg. for learning, employment, enjoyment etc)?
2. Will opportunities for social and community interactions increase or decrease?
3. How does the facility contribute to a sense of place? Will the facility change the sense of place?
4. Is the facility consistent with the existing community identity?
5. How does the facility enhance the character of the locality?
6. How does the facility enhance or detract from the existing cultural heritage of the locality?
7. How does the facility enhance or detract from the existing cultural life of the community?

There is currently insufficient information provided within the SSD regarding the operation of the Sydney Zoo to determine the potential positive and negative social impacts associated with the proposal.

Appendix B

Focus Groups Methodology

Focus groups were conducted with a mix of families to explore and understand the decision factors associated with visiting zoos and animal attractions, and in particular how this differs based on proximity to the attraction. There were 4 groups conducted, with the sample split based on usage of Featherdale Wildlife Park and place of residence. Respondents were recruited according to the following pre-determined criteria.

GROUP NUMBER	SEGMENT	SOURCING
1	Featherdale customers Have visited Featherdale in last 12 months Western Sydney (refer to list of suburbs) Families - Children aged mostly 1-13 (can have some older children)	Email sent to Featherdale database inviting interested families to contact the recruitment company.
2	Featherdale customers Have visited Featherdale in last 12 months Beyond catchment suburbs Families - Children aged mostly 1-13 (can have some older children)	Email sent to Featherdale database inviting interested families to contact the recruitment company.
3	Non Featherdale customers Have visited a zoo or major animal attraction in Sydney in past 12 months Western Sydney (refer to list of suburbs) Families - Children aged mostly 1-13 (can have some older children)	Sourced from Q&A panel database
4	Non Featherdale customers Have visited a zoo or major animal attraction in Sydney in past 12 months Beyond catchment suburbs Families - Children aged mostly 1-13 (can have some older children)	Sourced from Q&A panel database

Other criteria

- All respondents to have visited a zoo, or major animal attraction in past 12 months
- All respondents to have visited attractions with an entry cost at least 6 times per year
- Likely to visit a zoo or major animal attraction in the next 12 months
- 5-6 respondents in each group to have had international or interstate visitors visit in the past 12 months
- Representation of suburbs and household income (range of socio demographic profiles).

Other key features of the focus groups include the following:

- 8 respondents participated in each session.
- Respondents were paid to attend
- The groups were conducted at the Atura Hotel, Blacktown on the 1st and 2nd February 2016
- The groups were moderated by an experienced professional who used non-directional questioning to ensure respondents were not “led”
- The researcher is bound by the code of professional conduct as set out by the Australian Market and Social Research Society, i.e. the professional body.

Suburbs Within 20 Minute Drive of the Sydney Zoo Site and Defined as Western Sydney

ABBOTSBURY	CARLINGFORD	FAIRFIELD WEST	HORSLEY PARK
ACACIA GARDENS	CARTWRIGHT	FAIRFIELD	HOXTON PARK
ARNDELL PARK	CASTLE HILL	GIRRAWEE	HUNTINGWOOD
ASHCROFT	CASULA	GLENBROOK	INGLEBURN
AUBURN	CECIL HILLS	GLENDENNING	JAMISONTOWN
AUSTRAL	CECIL PARK	GLENFIELD	KELLYVILLE RIDGE
BADGERYS CREEK	CLAREMONT MEADOWS	GLENMORE PARK	KELLYVILLE
BAULKHAM HILLS	COLEBEE	GLENWOOD	KEMPS CREEK
BEAUMONT HILLS	COLYTON	GRANVILLE	KINGS LANGLEY
BELLA VISTA	CONSTITUTION HILL	GREEN VALLEY	KINGS PARK
BERKSHIRE PARK	DEAN PARK	GREENFIELD PARK	LALOR PARK
BIDWILL	DHARRUK	GREYSTANES	LAPSTONE
BLACKETT	DOONSIDE	GUILDFORD WEST	LEONAY
BLACKTOWN	DUNDAS	GUILDFORD	LEPPINGTON
BLIGH PARK	EASTERN CREEK	HARRIS PARK	LETHBRIDGE PARK
BONNYRIGG HEIGHTS	EDENSOR PARK	HASSALL GROVE	LIDCOMBE
BONNYRIGG	EDMONDSON PARK	HEBERSHAM	LIVERPOOL
BOSSLEY PARK	EMERTON	HECKENBERG	LLANDILO
BUSBY	EMU HEIGHTS	HINCHINBROOK	LONDONDERRY
CABRAMATTA WEST	EMU PLAINS	HOLROYD	LUDDENHAM
CAMBRIDGE PARK	ERSKINE PARK	Homebush Bay	LURNEA
CAMELLIA	FAIRFIELD EAST	Homebush West	MACQUARIE LINKS
CANLEY HEIGHTS	FAIRFIELD HEIGHTS	HORNINGSEA PARK	MARAYONG

MARSDEN PARK	PEMULWUY	SOUTH PENRITH	WOODCROFT
MAYS HILL	PENDLE HILL	SOUTH WENTWORTHVILLE	WOODPARK
MERRYLANDS WEST	PENRITH	SOUTH WINDSOR	YENNORA
MERRYLANDS	PLUMPTON	ST CLAIR	KINGSWOOD
MIDDLETON GRANGE	PRAIRIEWOOD	ST JOHNS PARK	SILVERWATER
MILLER	PRESTONS	ST MARYS	
MINCHINBURY	PROSPECT	STANHOPE GARDENS	
MOUNT DRUITT	QUAKERS HILL	THE PONDS	
MT PRITCHARD	REGENTVILLE	TOONGABBIE	
MT VERNON	RICHMOND	TREGEAR	
MULGOA	RIVERSTONE	VINEYARD	
NEWINGTON	ROOTY HILL	WAKELEY	
NORTH PARRAMATTA	ROPES CROSSING	WENTWORTHVILLE	
NORTH ROCKS	ROSEHILL	WERRINGTON COUNTY	
NORTH ST MARYS	ROSSMORE	WERRINGTON DOWNS	
NORTHMEAD	ROUSE HILL	WERRINGTON	
OAKHURST	RYDALMERE	WEST HOXTON	
OATLANDS	SADLEIR	WEST PENNANT HILLS	
OLD GUILDFORD	SCHOFIELDS	WESTMEAD	
OLD TOONGABBIE	SEVEN HILLS	WETHERILL PARK	
ORCHARD HILLS	SHALVEY	WHALAN	
OXLEY PARK	SHANES PARK	WILLMOT	
PARKLEA	SMITHFIELD	WINDSOR DOWNS	
PARRAMATTA	SOUTH GRANVILLE	WINSTON HILLS	

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