

10 June 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 regarding the Response to Submissions (RTS) submitted by the Applicant in regard to 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 maintains its objection to the proposal on the grounds that it will result in unacceptable economic and social impacts. We submit that the information provided in the RTS fails to provide a properly researched or balanced assessment of the potential impacts of the proposed new zoo on Featherdale Wildlife Park.

It is entirely clear that the character of the proposed new zoo and its close physical 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.

We submit that the impacts arising from the proposal are significant enough to warrant it being recommended for refusal.

Submission

A review of the information provided in the RTS has been completed, with the following key issues arising:

1. *The assessment of the social-economic impact provided by the applicant is deficient*

Please find attached a letter of advice prepared by Princess Ventura, Director of Economics and Market Research at Urbis Pty Ltd which highlights the following in regard to the Socio-economic Impact report prepared by KPMG report dated May 2016:

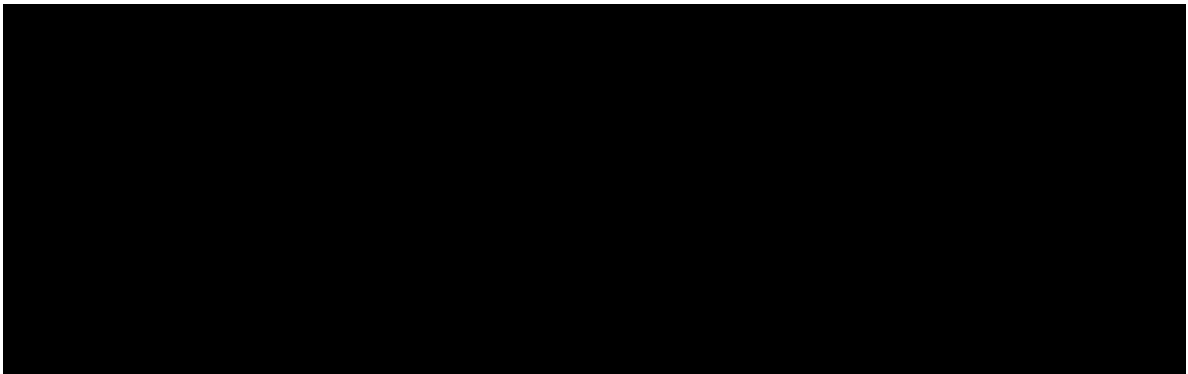
- *The KPMG Socio-economic Impact of Sydney Zoo May 2016 report still does not provide a balanced economic impact assessment of the development on the immediate and broader locality.*
- *The basis of the market penetration rates and estimated local visitors assumptions in the KPMG report has not been provided. Thus, the report's inference that there is 'spare capacity' for zoo visitation in Sydney given the current market penetration rates is unsubstantiated.*
- *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 conducted by Urbis, confirms this is not the case.*

- *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.*
- *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.*
- *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.*

2. The proposal threatens the viability of Featherdale Wildlife Park

Elanor has engaged Deloitte to conduct an assessment of the potential financial impact of the proposed new zoo on Featherdale Wildlife Park – see attached. This report contains sensitive commercial information and is provided to the Department on a ‘commercial in confidence’ basis and we request that this information not be disclosed without approval from Elanor.

The Deloitte report models a range of patronage impact scenarios at Featherdale resulting from the proposed new zoo based on the information provided by KPMG and Urbis. The Deloitte report concludes as follows:

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3. Misrepresentation of Elanor’s position

Elanor is greatly concerned that the commentary provided in Section 2.3.2 of the Response to Submissions report prepared by JBA misrepresents the outcomes of a meeting between Sydney Zoo Pty Ltd and Featherdale.

Please find attached a letter from Elanor responding to the statements in this Section summarised as follows:

- *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.*
- *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.*
- *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.

- *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.*
- *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.*
- *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.*
- *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.*
- *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 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.*
- *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.*

Summary

We submit that the RTS is deficient in that it fails to provide a properly researched or balanced assessment of the potential impacts of the proposed new zoo on Featherdale Wildlife Park.

Information attached to this letter demonstrates that the character and close physical proximity of the new zoo will cause significant negative impacts on patronage at Featherdale, reducing the viability of the operation, resulting in adverse overall social and economic impacts in the locality, threatening the following:

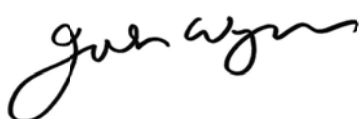
- Employment, particularly of the many local people who work at Featherdale.
- Mobile education programs provided at Featherdale supporting schools and disadvantaged local residents.
- On site education programs provided at Featherdale being a syllabus linked education program for young students.
- Work experience placements for Year 10 students weekly in the areas of Business/Tourism, Retail and Administration, Horticulture or working with Captive Animals.
- TAFE and volunteer programs providing experience and training in the care and management of captive native animals.

- Breeding and preservation programs provided at Featherdale for some of Australia's most endangered species.

We submit that the potential impacts are significant enough to warrant the proposal being recommended for refusal.

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,

A handwritten signature in black ink, appearing to read "John Wynne".

John Wynne
Director

Attachments:

- Urbis letter dated 10 June 2016.
- Deloitte 'financial impact analysis' dated 10 June 2016.
- Elanor Investors letter dated 10 June 2016.

10 June 2016

John Wynne,
Managing Partner, Urbis
Level 23, Tower 2, Darling Park
201 Sussex Street
SYDNEY NSW 2000

Dear John,

Sydney Zoo SSD 7228 – Comments on Sydney Zoo's Response to Submissions

This letter summarises my views regarding the following Response to Submissions (RTS) that proponents of the Sydney Zoo have released in response to public submissions.

- JBA Sydney Zoo SSD 7228 Response to Submissions (May 2016)
- Appendix P: Submission #7 – Specific Responses
- Appendix O: KPMG Socio-economic Impact of Sydney Zoo (May 2016).

SUMMARY OF OPINION

- The KPMG Socio-economic Impact of Sydney Zoo May 2016 report still does not provide a balanced economic impact assessment of the development on the immediate and broader locality.
- 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.
- 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 conducted by Urbis, confirms this is not the case.
- 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.
- 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.
- 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.

DEFICIENCIES IN ECONOMIC IMPACT ASSESSMENT ASSUMPTIONS

1. The KPMG report still does not provide a **balanced economic impact assessment** of the development on the immediate and broader locality.
 - The report makes no attempt at estimating the share of the Sydney Zoo business that would constitute a redistribution of existing business from existing facilities such as the Featherdale Wildlife Park.
 - The basis of the market penetration rates and estimated local visitors assumptions by LGA 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.
 - Drivers to visit zoos and animal attractions were explored in the Urbis Focus Groups conducted last February. 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:
 1. Proximity – respondents confirmed that proximity is a driver in the decision making around visiting animal attractions
 2. 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
 3. Budget – families are often budget conscious and would therefore be unlikely to visit two animal attractions within the same period
 4. 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 currently 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.

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.

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. The Appendix P: Submission #7 – Specific Responses document 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, the results of the Urbis focus groups suggest that this is not the case.**

- When examining impact, another consideration is the number of visits families make to animal attractions. The Urbis focus groups found that 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”

- The lower incomes and higher unemployment in Western Sydney highlighted in the KPMG report means that Western Sydney residents are even more unlikely to increase their frequency and spending on animal attractions with the addition of Sydney Zoo.

3. **The extent of the contribution of the Sydney Zoo to the NSW economy is still over-stated.** The tourist expenditure, visitor travel expenditure and employment benefits that are being attributed to the Sydney Zoo are all in gross terms. 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.

- 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.
- 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 in the KPMG report. 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. The **case studies and benchmarks relied on** in the KPMG report to support the hypothesis that the Sydney Zoo will not have a detrimental trading impact on the Featherdale Wildlife Park **are not relevant comparisons**.
 - Benchmarking the combined Taronga Zoo, Featherdale Wildlife Park and Sydney Zoo visitation and market penetration against the combined Melbourne Zoo, Werribee Zoo and Healesville Zoo to prove the potential to support the Sydney Zoo without any detrimental impacts on the Featherdale Wildlife Park and Taronga Zoo is not an appropriate comparison. The Melbourne attractions are geographically more spread out than and sit in a different context from the Sydney attractions.
 - Melbourne Zoo is 3.5 km north of the CBD. The exhibits comprises of both Australian and exotic animals within a more traditional zoo environment.
 - The Werribee Open Range Zoo is some 35 km west of the CBD. It is an African themed zoo where visitors take a 30-45 minute bus tour to see exotic animals roam free in a simulated African grassland environment.
 - The Healesville Sanctuary is located in rural Victoria approximately 65 km east of the CBD. It specialises in native Australian animals. The zoo is set in a natural bushland environment where paths wind through different habitat areas.

The proposed Sydney Zoo is too close to Featherdale. Therefore, as shown in the Urbis Economic and Social Impact Assessment: Sydney Zoo SSD 7228 February 2016 report, even after allowing for population and visitation growth, the catchment resident and visitor

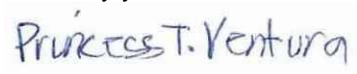
population to the area may be insufficient to be able to sustain both the Featherdale Wildlife Park and the Sydney Zoo.

- The prospect of the Featherdale Wildlife Park and Sydney Zoo operating in close proximity being compared to the David Fleay Wildlife Park and Currumbin Wildlife Sanctuary on the Gold Coast is not analogous as these combined Queensland attractions generate a combined much lower level of visitation than what would be required by the combined Featherdale Wildlife Park and Sydney Zoo. The Currumbin Wildlife Park Sanctuary attracts a similar level of visitation to Featherdale of around 400,000 per year, while the David Fleay Wildlife Park is a much smaller attraction with only around 17,000 visitors per year.

DEFICIENCIES IN SOCIAL IMPACT ASSESSMENT ON THE COMMUNITY

1. The KPMG report still **does not consider the potential negative social impacts** of the development on the immediate and broader locality.
 - The social discussion in the 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.
2. The Urbis February 2016 report finds that **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.
3. **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.
4. **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.
5. 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.
6. **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.

Sincerely yours,

A handwritten signature in blue ink that reads 'Princess T. Ventura'. The signature is written in a cursive, slightly stylized font.

Princess Ventura
Director



10 June 2016

By Email: rebecca.sommer@planning.nsw.gov.au

Rebecca Sommer
NSW Department Planning & Environment

Dear Ms Sommer

Sydney Zoo: State Significant Development (SSD 7228)

We refer to section 2.3.2 of the 'Response to Submissions: Sydney Zoo SSD 7228' prepared by JBA Urban Planning Consultants Pty Ltd dated May 2016 (**Response to Submissions**) which purports to summarise the 'outcomes' of a meeting between representatives of Sydney Zoo Pty Ltd and Elanor Investors Group (**Elanor**) on 13 April 2016.

Elanor is greatly concerned that Sydney Zoo Pty Ltd has 'painted a picture' that Sydney Zoo and Featherdale can co-exist as a key 'economic outcome' of that meeting.

Elanor wishes to make it very clear to the NSW Department of Planning & Environment (**DoPE**) that Sydney Zoo Pty Ltd's position on economic impacts:

- I. was not accepted by Elanor during the meeting of 13 April 2016, and has been consistently refuted by Elanor in its submissions to the DoPE; and
- II. is fundamentally inconsistent with the 'economic picture' that has previously been painted by Sydney Zoo Pty Ltd. In this regard, Elanor confirms that during a meeting on 29 July 2014 Jake Burgess, of Sydney Zoo Pty Ltd, said words to the effect that 'the new Sydney Zoo will put Featherdale out of business.'

In relation to the specific bullet points set out in the Response to Submissions, Elanor's response is as set out in the table below.

Sydney Zoo Pty Ltd's Position	Elanor's Response
<i>'The offerings provided by the two facilities are differentiated through price, time of experience, the animal collection and the display strategy'</i>	It is Elanor's position, as supported by the findings of Urbis' submissions to the DoPE dated 15 February 2016 and 10 June 2016 (together the Urbis Submissions) 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.

Sydney Zoo Pty Ltd's Position	Elanor's Response
<p><i>'A key part of Featherdale's customer attraction and differentiation to other facilities is providing visitors with the ability to get "up close and personal" with the animals.'</i></p>	<p>It is Elanor's position that the key differentiation between Featherdale's customer attractions to other facilities is the interaction between visitors and <u>native animals</u>. 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.</p>
<p><i>'Sydney Zoo's animal collection efforts are well progressed, with identification of sources for almost all of the animals expected to be in the Zoo collection. Accordingly, the Zoo expects to open with a full complement of exotic species from the outset. Sydney Zoo stated that to do otherwise would disappoint the public and result in a loss of credibility and audience momentum that would potentially take years to rebuild.'</i></p>	<p>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.</p> <p>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.</p>
<p><i>'Sydney Zoo believes that there is a great opportunity for the Zoo and Featherdale to work together constructively to increase audience penetration in the Sydney market, and Elanor executives stated that they intended to investigate strategies for achieving this.'</i></p>	<p>This statement does not accurately reflect Elanor's executives' position during the meeting of 13 April 2016. 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.</p>

Sydney Zoo Pty Ltd's Position	Elanor's Response
<p><i>'In the interim Sydney Zoo will ensure that Elanor is afforded the opportunity to participate in the strategic discussions that are being planned between other local tourism operators and Destination NSW. Featherdale can/be an important contributor to plans to develop the Western Sydney tourism cluster and together have the opportunity to work towards improving infrastructure development, progressing the area's growth and development, and improve visitor numbers to the area.</i></p> <p><i>Sydney Zoo is also seeking to examine ways in which collaboration on public education and conservation outcomes could be achieved. This has the potential to allow both facilities to serve the community while simultaneously improving brand awareness and overall audience participation.</i></p> <p><i>Elanor have confirmed that they are open to discussing collaborative opportunities with the Sydney Zoo'</i></p>	<p>The above statements fall into the 'collaboration and co-exist' branding that has been created by Sydney Zoo Pty Ltd, and its consultants, for the purposes of the Response to Submissions.</p> <p>Elanor does not accept that position for the reasons set out in the Urbis Submissions. At its highest, 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.</p> <p>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.</p> <p>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.</p>

It is beyond doubt that the closure of Featherdale would have overall adverse social impacts in the locality.

Featherdale is, as clearly outlined in Urbis' submission to the DoPE dated 15 February 2016, a major contributor to the conservation of Australian native fauna. It provides considerable education and workplace programs, and programs to increase awareness and social interaction with the community.

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 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.



In light of the above it is Elanor's position that:

- 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
- the DoPE should recommend the proposed Sydney Zoo for refusal.

Elanor is determined to vigorously protect the community cultural icon which is Featherdale Wildlife Park and reserves all of its rights in relation to any decision by the consent authority to approve Sydney Zoo.

Please do not hesitate to contact me if you would like to discuss any aspects of this submission.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Willis". The signature is fluid and cursive, with a prominent "G" and "W".

Glenn Willis
CEO
Elanor Investors Group