

Response to Taronga Conservation Society Australia's State Significant Development Application SSD15-7419 – The Australian Habitat and Taronga Wildlife Retreat – Response by Mr Eddie Swat - 23 May 2016

SMH – Thursday 14 April 2016

“Parks and Trees Make Way for Profit” Elisabeth Farrally writes:

“I thought we were better than this. I honestly thought Sydney had finally outgrown its urge to trash itself repeatedly for speed and concrete and money, its valuing of everything hard and fast over anything soft and yielding like a place or a tree.....but everywhere you look, beauty is being turned to ugliness, the gently daggy to the wildly unsustainable, public delight to profit”

This is a Misleading Development Application

Development Application SSD15-7419 by the applicant, Taronga Conservation Society Australia (TCSA's), is a misleading set of documents and should only be assessed when it adequately and transparently references the Taronga Zoo Master Plan 2000 TZMP2000 and its suite of supporting planning documents.

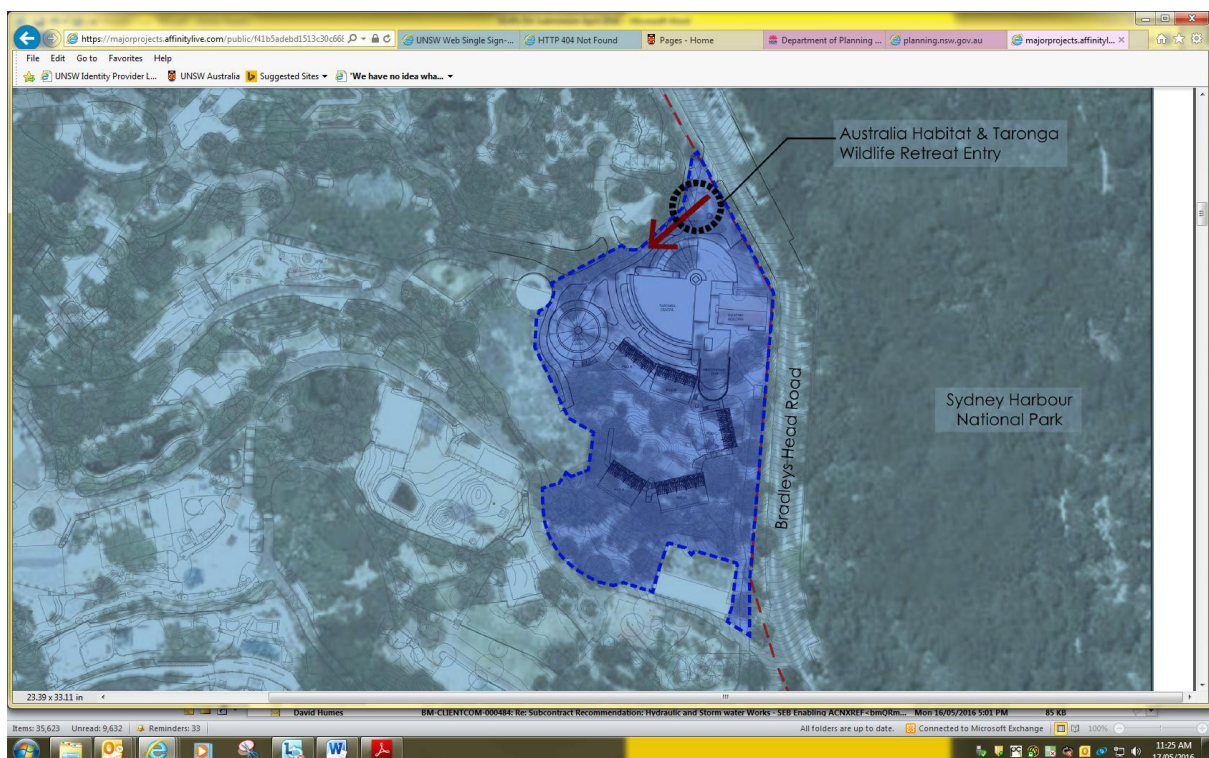
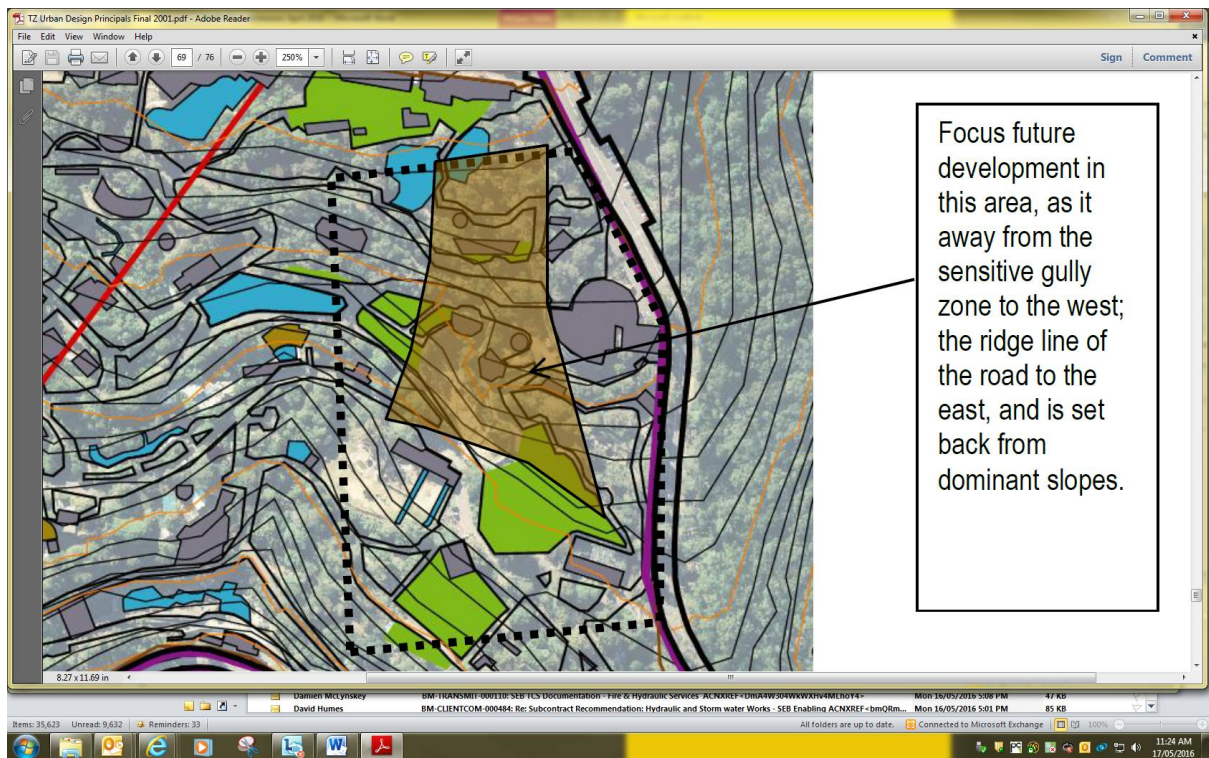
SSD15-7419 was placed on Public exhibition, yet the only available benchmark document for Public scrutiny was a hard copy of TZMP2000 in the foyer of the Department of Planning and Environment's offices at Bridge Street Sydney. This is not a transparent Public Exhibition period, as critical information required for an objective Public assessment has not been widely available alongside the SSD15-7419 application online.

SSD15-7419 includes highly selective artist's impressions which only show acceptable aspects of the development. For example the application only presents the two storey hotel development units, conveniently avoiding representation of several 3 & 4 storey hotel units, and the heavily glazed and over height Taronga Centre 'Link' Building. All artist impressions avoid representing views with the greatest visual and environmental impact, making the SSD15-7419 misleading.

Terminology such as “pods” and “immersive” to describe what is ‘visually’ medium density residential or hotel development is deliberately misleading and the proponent should be asked to remove such terms from the application. This is a commercial development of the first order and will operate 27/7, 365 days a year. What purpose is there for a licenced bar opened to 1am each morning? The DA is deliberately misleading.

The removal of 2 significant trees by the applicant, separate to this DA is an attempt to reduce the perceived impact of the proposal on the site's existing heritage curtilage and built form. The Urban Design Advisory Services (UDAS) Urban Design Principles & Visual Analysis document for Taronga Zoo, May 2001 states development should “Preserve significant items of vegetation within the zoo”. The UDAS document also shows an envelope for future development which the Taronga Conservation Society Australia (TCSA's) development ignores. Instead TCSA's application misrepresents the site constraints by referencing Figure 4, a small portion of Godden Mackay Logan's Conservation Management Plan. Clearly the TCSA's development proposal contravenes the

UDAS document by proposing to build along the ridgeline outside the envelope designated by UDAS. The TCSEA's application is once again, misleading.



The TCSEA's proposal claims that the Australian Habitat and Taronga Wildlife Retreat (AHTWR) will not "significantly alter" traffic and parking and has probably made the same claim in all State Significant Development applications since 2013. The TCSEA's application does not reference the Parsons Brinckerhoff "Traffic Transport and Parking Strategy (May 2003) because it knows that

Traffic and Parking provisions were exceeded in 2013 when visitation exceeded the maximum projected by the PB report of 1.4m visitors per annum. The TCSA's application quotes visitation of "MORE THAN 1.7m visitors per annum", so clearly the statement that "traffic and transport will not significantly alter" has been false for some time, and a new comprehensive and integrated study is required to determine the actual impacts on Traffic and Parking since 2013, and those associated with further growth in visitation and all future site development proposals. The PB report also noted that TCSA needed to provide additional staff car parking once parking along Bradleys Head Road became metered. This has now occurred, but no increase in site parking has been delivered by TCSA. The problems with development of the Taronga site extends further than just Transport and Parking and recent and proposed developments have and will change modal splits, frequency and number of cars and coaches. Clearly TCSA has had the time and the money to review and submit a revised Master Plan and supporting planning documents, but has chosen not to. This strategy maintains their development ambivalence and makes it difficult for the Public to question its development intentions. TCSA has embarked on a number of isolated development proposals not in line with TZMP2000, not following a sustainable development framework, and demonstrating contempt for the Public Interest and Government agencies alike.

Premier's Priorities and Plan for Growing Sydney 2031

The TCSA's proposal claims to comply with the framework for "sustainable growth and development across Sydney over the next 20 years". This is a false statement, as progressively privatising Taronga Zoo with development such as "Roar n Snore" and now AHTWR reduces general public access to an already limited zoo area and animal collection. The TZMP2000 required sustainable "precinct" development as an alternative to the 'project by project' piecemeal development of the past. AHTWR is a return to a piecemeal development approach and a complete departure from TZMP2000, which, if approved, will remove the opportunity to build the TZMP2000's accessible primary Eastern pathway, as shown in the Master Plan (again conveniently omitted in the AHTWR submission). The TCSA's proposal is not sustainable development as it only focuses on the short term generation of revenue, does not take into account the loss of publically accessible space in the short and long terms, the loss of accessible primary circulation pathways, or the reduction of the animal collection plan. The proposal also does not demonstrate the additional 'back of house' facilities required to adequately support such a development. The TCSA's proposal is misleading in all these respects. My question is, why is the TCSA not required to adequately demonstrate these real and negative environmental impacts in its DA application? This TCSA's application is in the Public interest, but has not been publically exhibited with the transparency required for informed comments to be made. The Public Exhibition period needs to be extended and further benchmark planning documents need to be made available for public scrutiny.

Departure from Approved Master Plan - Taronga Zoo 2000

Taronga Zoo's Master Plan TZ2000 is based on focus groups findings, 'hard' data and detailed site analysis to produce a fully coordinated suite of Master Plan Implementation Strategy documents. After two years of consultation with the Public and all relevant State Government agencies, TZMP2000 became the guiding and approved State Government planning document for all future State Significant approvals at Taronga Zoo, yet it rates one throw-away mention in the TCSA's application.

The TSCA's proposed development is a complete departure from not only the approved TZMP2000, but all of the Mater Plan's supporting planning documents. The TSCA's development application ignores the TZMP2000 and its supporting documentation, simply by not making any reference to them. The TSCA has also removed all such documents from its website and has reverted once again to a "piecemeal approach to the site's development". Without these documents, the Public would only be able to assess the Development Application as "stand alone" and without proper context and without understanding the actual Environmental Impacts represented by the Development Application as it relates to the whole site. The Public Exhibition Period must be extended and all relevant benchmark documents be made available alongside SSD15-7419 to allow a proper transparent process and to enable the Public to make properly informed comments. Prior to this, however, the Applicant TSCA should be requested to remove misleading statements from the application and provide a more balanced representation of SSD15-7419's environmental impacts.

In summary, the TSCA's proposed development:

Ignores, and attempts to hide the ramifications of the Parson's Brinkerhoff Traffic and Parking study and cumulative impacts of site development since 2013. Existing visitation numbers have already exceeded the maximum projected visitation numbers by more than 25%, yet this continues to be ignored in all State Significant Development Applications. To date, the applicant's responses appear to be accepted over expert opinion, challenging the impartiality expected of the Department of Planning and Environment assessment reports.

Ignores the site wide primary pedestrian circulation route approved under TZ2000, which was the approved Urban Design solution to deliver equitable access across the site, in this case as a final component of a primary accessible circulation path on the Eastern side of the Zoo. The TSCA proposed development is not only an attempt to privatise a significant area of the Zoo, but removes the opportunity to delivery equitable egress for the general Zoo visitor. SSD15-7419 simply ignores significant Urban Planning issues and does not provide an alternate equitable access solution.

The TSCA's proposal ignores the recommendations made by the UDAS document by building along a ridge line and by not "using a palette of materials that relates to a particular precinct" in this case the Australian precinct, which as a precinct has heritage significance. GML May 2001 & TZMP2000.

By far, the greatest environmental impact, if this development is allowed, will be the loss of another significant part of the Zoo to general public access. The offer of "token" viewing windows into the AHTWR is unacceptable. This is a Public asset and it should not be progressively privatised for the benefit of the wealth few. The TSCA does not disclose the 'price-point' for this experience and as such, once again, is misleading the Public into thinking the development's primary aim is to promote conservation. The TSCA must disclose the restrictions it is placing on the general paying public in gaining access to this area of the Zoo, and the reduction of animal collection plan, as a result of these species being relocated into the AHTWR. Stop the privatisation and degradation of another Public Asset.

The applicant's Urbis "Planning Compliance Assessment" has no value as it does not reference all the relevant planning documents against which this proposal must be assessed. The document list should include the TZMP2000, Parson Brickerhoff "Traffic Transport and Parking Strategy and the Urban Design Advisory Services, "Urban Design Principals & Urban Analysis. The Planning

Compliance Assessment document is a 'box ticking exercise' to report that each area of the assessment has a report attached to it. This does not represent compliance.

Taronga Centre – Building Code of Australia Compliance

The TCSA's proposal notes that although the AHTWR is an extension of the Taronga Centre and a Taronga Centre's Master Plan has been developed, that it does not intend to complete "these works ... at the same time as the AHTWR" The Taronga Centre has a significant number of BCA non compliances and any work to the Taronga Centre should trigger the requirement for TCSA's to address these BCA non compliances in this Development Application. The proposal to build a 'Link' Building should trigger compliance for the Taronga Centre.

Traffic and Parking

Parsons Brinkerhoff (PB) Traffic and Parking study and report underpins Taronga Zoo Master Plan 2000 (TZ2000). The PB's recommendations were based on maximum visitation of 1.4 million visitors per annum in 2013 and highlighted critical reductions in future parking availability such as metering by Mosman Council along Bradley's head Road. TCSA under the PB study was to provide parking on site for staff to accommodate this shift in parking demand when meters are installed. Yet the TCSA's application claims "MORE THAN 1.7M per annum" visitors, a 25% increase over PB's maximum forecast and blatantly states that there will be no adverse impact on parking or traffic as a result of this development. The AHTWR DA makes no reference to the approved Master Plan and its associated Traffic and Parking report and other associated Urban Planning documents approved by various State Agencies. The AHTWR community consultation document refers to the visitors experiencing a 24 hour stay, yet the DA does not acknowledge that this does have a cumulative impact when consideration is given to Roar n Snore; Taronga Centre functions; the new Sumatran Tiger Precinct; The proposed New Institute of Science and Learning; The Twilight Concert Series; Vivid and other Commercially driven Night Zoo activities. AHTWR's Parking and Traffic study should directly reference the PB report and re model the impacts of 16 years of growth prior to modelling the cumulative effects of existing and future commercial night time activities. The more serious issue of emergency evacuation for Zoo visitors and residence from Mosman needs to be re modelled, based on peak visitation days and annual visitation numbers not yet tested by TCSA; Mosman Council or the NSW Rural Fire Service. The applicant's Traffic and Parking report by GTA Consultants is an unsubstantiated report, not produced in conjunction with the PB report and which carries no credibility. How can the applicant be permitted to ignore the findings and recommendations put forward by the PB report for 2003-2013 and continue to submit misleading advice on this serious planning issue?

Loss of Public Amenity. Loss of Animal Exhibit Space. Reduction in Education and Conservation Awareness

The Australian Habitat & Taronga Wildlife Retreat (AHTWR) hopes to emulate the success of National Zoo's Jamala Wildlife Lodge (which charges \$1000 to \$2000 per night). The TCSA claims that the AHTWR project's primary purpose is to educate and create conservation awareness and TCSA quotes the pre and post survey figures of their Roar and Snore program to justify the project and distract the Planning Assessment Officer from the primary purpose of the development which is

revenue at the expense of public and animal amenity. The TCSA proposal, if it is allowed to go ahead, will further privatise another significant area of what is a Public Zoo, by restricting access to a small number of high paying customers. The TCSA's justification for this commercial venture is "Public Environmental Awareness" and it calls up pre and post Roar n Snore survey information to demonstrate the success of such programs. What the TCSA conveniently omit is any follow up survey data or comparative surveys which demonstrate the effectiveness of 'In Situ' (Meaning in the field) conservation work, or the success of educating a greater number of general admission Zoo visitors, through providing better and broader access to educational programs within the Zoo proper. The development of a Australian Habitat Taronga Wildlife Retreat in the proposed location will reduce the animal collection plan once again, reduce Zoo access for the general Zoo visitor, degrade the immediate and surrounding Environment for exhibiting animals and Public amenity and does not reflect the TCSA's own "Animal Welfare Charter". The AHTWR, if approved, will follow the loss of Public access and amenity where 'Roar n Snore' now presides and the Bull Elephant off-exhibit area. The TCSA is once again trying to trade sustainable development for the benefit of a small number of high paying customers.

The applicant's Ecology report is superficial and makes unsubstantiated statements about Social benefit, however does not address the loss of Social benefit for a much greater number of Zoo patrons, as a result of this development. Development Application SSD15-7419 is not an appropriate development for a Public Zoo, or for this visually sensitive foreshore ridgeline. The TCSA's Ecology report is misleading and inaccurate.

Threatened Species – The Red-Crowned Toadlet

A population of Red-Crowned Toadlets has been recorded in Sydney Harbour National Park, immediately adjacent to the Taronga Centre and Eastern most part of the TZ wall on Bradley's Head Road. Overland stormwater passes through the Taronga Centre Gate and stormwater pipes into the Zoo which has resulted in Red-Crowned Toadlets within the Zoo's property. A number of Zoo keepers have identified the mating calls of the endangered frog adjacent and within the Australian Blue Mountains Bushwalk Exhibit. Prior to any future development in this area the TCSA must carry out a fauna study to determine the number and extent of Red-Crowned Toadlets within the zoo grounds and determine a strategy to protect them.

The applicant's Ecology report includes three superficial and inadequate lines regarding Fauna and must be amended.

<http://www.environment.nsw.gov.au/threatenedSpeciesApp/profile.aspx?id=10692>

www.mosman.nsw.gov.au/file_download/360/bushland_matters_spring_2004.pdf

<http://bookings.conservationvolunteers.org/project/info/61563#sthash.mj1qIVy7.dpuf>

http://www.google.com.au/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0ahUKEwiQxMzns-fMAhUEL6YKHaVKC98QFggBMAA&url=http%3A%2F%2Fwww.mosman.nsw.gov.au%2Ffile_download%2F1875%2FMosmanNews-May2010.pdf&usg=AFQjCNE51OU5knD7i8zmROKbAXHbGWcD-A&sig2=QzAWxxtJR74wMYRnDhF_jw&bvm=bv.122448493,d.dGY

Acoustics

The TCSA's operation plan indicates that the facility will be occupied and operate 24/7, 365 days a year. As I have a special interest in acoustics, I can see that the orientation of the residential buildings in a 'radial' fashion, and their glazed facades will create a significant noise impact, focusing noise on the central exhibit areas, much like many courtyard designs for residential and hotel buildings (yes we have all stayed in one). This issue has not been addressed by the applicant and represents another example of the TCSA's indifference to animal welfare, both within and immediately adjacent to the proposal. The proposed residential balconies overlooking the central exhibits will have occupants (some under the influence of alcohol as this is to be a licenced venue), not able to gauge the level of noise they may be creating, up to 1am of each morning (as bar and terrace are to be open between 6am - 1am 7 days per week). The same needs to be demonstrated regarding noise from associated mechanical plant systems. The potential of 24/7 reflected noise, between buildings and on the animal's environment needs to be addressed by the applicant. The animals in and surrounding this development will be adversely impacted by noise 24/7 365 days a year.

Bushfire & Dangerous Animal Escapes & Other Emergencies

The AHTWR proposal located in a bush fire prone area and needs to respond accordingly:

file:///C:/Users/Eddie/Contacts/Downloads/BushFireProneLandMap_A0_v20150729_Layout.pdf

The cumulative effect of increased visitation and multiple commercial activities at Taronga needs to be modelled for fire and dangerous animal escape evacuation. Bradley Head Road is a single carriageway and collectively with evacuation of Bradleys Head and the greater Mosman area may prove to be an evacuation risk. Government agencies have not been made aware of Taronga's increased visitation numbers since the approval of TZ2000 16 years ago. Such risk need to be re assessed.

Solar Access

By enclosing the proposed exhibit areas 'radially' with these residential buildings and constructing further south of the Taronga Centre, the development will significantly overshadow the Animal Exhibits and Holding areas. Solar access will be reduced to only a few hours in the winter months. Of more concern is the longer shadow produced by the 4 storey buildings over existing and future exhibit areas to the immediate South, such as over the Tasmanian Devil Exhibit and Blue Mountains Bushwalk, which is already badly overshadowed. It is well known that Devils "enjoy basking in the sun at times...and those parts of the enclosures should be open to the sunlight"¹.

Shadow diagrams indicate that the development would considerably overshadow during the winter months. More seriously, having walked those areas of the Zoo for many years, I am questioning the accuracy of the shadow diagrams provided in the TCSA's application. Also, depending on the location and subdivision of smaller exhibits within the development, some exhibits may receive no solar access during winter months. For this reason the applicant should provide 'exhibit by exhibit'

shadow diagrams. For reasons of overshadowing, such developments were not proposed under the Taronga Zoo's Master Plan 2000. This proposal is a significant departure from TZMP 2000 and represents a degradation of a significant proportion of the Zoo's exhibit areas for the Zoo's longer term amenity and operation. The TCSA proposal will have a negative impact on captive animal welfare and visitor amenity.

View Corridors & Inappropriate Development

The overall effect of viewing Australian Native species with the proposed built form shown in the artist's impression appears suburban in nature, and hardly presents the importance of animal habitats the TCSA purports to be conserving. The impression of the residential/hotel units is actually a very effective example of urbanisation of natural environments as demonstrated by the development itself, and the effect on the Zoo grounds through degradation of natural view corridors and introduction of reflective surfaces is a very poor architectural solution for the site and the development's claimed purpose.

The application misrepresents the TZ2000's Urban Design Advisory Services (UDAS) Urban Design Principles & Visual Analysis document, May 2001, by including Figure 5 (Extract of a Map in the Conservation Management Strategy by Godden Mackay Logan) and stating that the document encourages development to take advantage of views from the site's ridge lines. The UDAS document states "Preserve the present views of green vegetation from the harbour, through minimising built form protrusions through the tree canopy, particularly on the prominent or exposed ridges". TCSA conveniently does not include the "no build" diagram 2.5.8 "Upper East" from the UDAS document on page 68 because it demonstrates their proposal falls outside the envelope and will cause visual impacts to views from the harbour.

The UDAS document states that developments should "avoid the use of reflective materials" and ensure that built elements "relate to the character of that precinct of the zoo, and in particular respond to nearby desirable built elements and heritage items, and existing vegetation." Yet the TCSA has orientated glazing towards the harbour. This development will result in light pollution at night and solar glare during the day when viewed from the harbour. The Link Building between the Hotel units and the Taronga Centre is particularly offensive structure which will detract heavily from view corridors within the zoo and from the harbour. The Harbourview Terrace, a second storey addition to the Taronga Centre was architecturally contentious at the time and eventually addressed some of its light pollution by providing solid balustrades. The AHTWR does the opposite by exploiting the use of glass to maximise views to the harbour. By doing so will degrades view corridors from the harbour and within the Zoo. This is not appropriate development for this sensitive foreshore ridgeline and does not comply with UDAS recommendations. The views within the AHTWR will be substandard, residential in nature, not in keeping with the Australian Precinct materials or the objectives of TZMP2000.

Scenic Protection Zone

http://www.legislation.nsw.gov.au/map/5350_COM_SCP_003_010_20111124.pdf?id=79cee8b5-fc8d-e353-a622-91a0e5bde1f9

The TCSA's proposal is medium density residential/commercial development and should not be constructed within a scenic protection zone.

Animal Numbers – Mortality Rate – Off Exhibit Space – Animal Handling

Although the TCSA claims the AHTWR will be a 24 hour experience for patrons, the DA does not articulate the contact times between visitors and animals. This, together with reduced exhibit area sizes, increased overshadowing will result in an increase in animal mortality rates. The same consideration and animal husbandry requirements were applied to Wildlife Sydney Zoo at Darling Harbour. The Department of Primary Industries should be consulted on the DA's negative impact on animal husbandry, the off exhibit animal facilities required to support this development and increased animal mortality rates.

Animal handling activities are stressful for animals and additional off-exhibit holding areas will be required to adequately manage the AHTWR animals. World leading Zoo design specialists, Jon Coe (Jon Coe Design Pty Ltd) and Becca Hanson (Studio Hanson Roberts) indicate that approximately an equal area to that of the animal exhibit for off-holding facilities are required to rest animals during their rotation prior to and post animal contact experiences. Such off holding animal areas have not been indicated in the DA application. Once again these would represent a further loss of public amenity and public exhibit viewing opportunities for the general paying public. In short, the loss of Public Zoo area is something greater than that shown in the DA application. Once again the actual environmental impact of the TCSA's development is deliberately not articulated.

Landscape Plan

The landscape plan does not reflect the requirements of the UDAS document or TZMP2000. The removal of 2 significant trees (and many others) in a separate application is a 'sleight of hand' and combined with the demolition of several heritage elements will have a significant negative environmental impact on the Zoo environment. The TCSA's DA is a complete departure from TZMP2000 and UDAS document and is not sustainable development. As such, this proposal should be rejected.

Conclusion

The question for the Department of Planning and Environment is, had the applicant not been a Government Trading Enterprise and was a Private Developer, would consent be granted if:

- The developer proposed a development contrary to an approved Master Plan, or continually proposed redevelopment within a sensitive coastal site, without a Master Plan?
- If the development proposed to Privatised Public land?
- If the development was situated in a bush fire prone area without adequate means for the population to escape?
- If the development was situated in a Scenic Protection Zone?
- If the developer made attempts to reduce the perceived Environmental impact by making misleading, unfounded or inaccurate statements?
- Proposed the removal of significant Heritage items (using a different approvals process)?
- Did not produce a Flora and Fauna impact study, and threatened to displace an endangered species of native frog?
- Did not demonstrate the impacts of their development on animal health and mortality?

Yours Truthfully

Eddie Swat CPP

ⁱ <http://nswfmpa.org/Husbandry%20Manuals/Published%20Manuals/Mammalia/Tasmanian%20Devil.pdf>