

Attention: Matthew Crane

1 May 2016

Leader Exhibited Animals  
Animal Welfare Branch  
Department of Primary Industries  
Locked Bag 21  
Orange NSW 2800

**RE: Taronga Conservation Society Australia (TCSA) – Development Application for an “Australian Habitat and Taronga Wildlife Retreat”**

Dear Mr Crane,

I write to you regarding my concerns for animal welfare at Taronga Zoo, specifically the Taronga Conservation Society Australia’s (TCSA) plan to build an Australian Habitat and Taronga Retreat (AHTR). The proposal is currently on Public Exhibition at NSW Planning and Environment, and I encourage your department to lodge its requirements in relation to the animal welfare impacts represented by the TCSA’s proposal, before submissions close on the 23 May 2016.

As the former Development Manager for the Zoological Parks Board I understand the constraints of exhibiting animals at the Mosman site. The proposal by TCSA represents a further degradation of the existing environment for exhibiting and management of Australian Fauna. Specifically:

**Reduced Solar Access**

Artist’s impressions and most drawings show double storey residential buildings hiding behind vegetation (referred to by TCSA as “pods” to deliberately misrepresent the impacts of the proposed development) but in fact the Architectural Sections show 5 residential buildings as high as the Taronga Centre, some 4 storeys high (only shown once in the application). 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 shadows produced by the 4 storey buildings over existing and future exhibit areas to the immediate South, such as over the Tasmanian Devil Exhibit. 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”<sup>i</sup>. Shadow diagrams can be viewed following the link below and 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 which the Department of Planning & Environment confirms is still the TCSA’s only approved development document. 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 operation. The TCSA proposal will have a negative impact on captive animal welfare.

[https://majorprojects.affinitylive.com/public/af4225503ee3638c96dd6d888b5ece6e/Appendix%20Architectural%20Plans\\_reduced\\_Part5.pdf](https://majorprojects.affinitylive.com/public/af4225503ee3638c96dd6d888b5ece6e/Appendix%20Architectural%20Plans_reduced_Part5.pdf)

### **Animal Handling**

An Operations Plan for the proposal has been lodged with the Department of Planning & Environment which notes that the development will "include a range of animal presentations and encounters" with "animals sourced from the existing Australian Animal Collection" and that "operating policies and procedures will be finalised at least 6 months prior to the opening" of the facility.

<https://majorprojects.affinitylive.com/public/bfdb9408ce2dec79be61249cfedfed2/Appendix%20Operational%20Management%20Plan.pdf>

As you know, such a proposal has significant 'embedded' implications for not only the animals which will be presented and handled, but also for the greater collection and access of that collection to the general Zoo visitor, both at Taronga and Western Plains Zoos. This development application and the way it has been structured ensures that the proposal's impact on the exhibited animals will not be known until 6 months before the development is due to open. This is an attempt by the TCSA to make your Department's consideration of the TCSA's application under the Exhibited Animals Protection Act 1986 (EAPA) more contentious. The animal collection, handling and health impacts need addressing now by the TCSA in the design and layout of the built form, and in accordance with the approved TZMP 2000 and the EAPA.

With 37.8 full time staff and 100 guests in residence, proposed at any one time. It is plausible that animal handling during a 24/7, 365 day a year operation will result in reduced animal health and higher mortality rates, than if animals were allowed to free range. Without an approved Animal Management Plan prior to the Development Assessment, the Department of Planning and Environment will not be able to adequately consider the true Environmental impacts of the TCSA's proposal, as those without a voice will not be heard.

### **Noise**

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 on the central exhibit areas, much like many courtyard designs for residential and hotel buildings (yes we have all stayed in one). This 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.

## **Animal Handling**

The TCSA proposes a 24/7 operation but provides no detail on the frequency and contact time between animals and patrons. The impact on animal health needs to be detailed and the number and species of animals proposed for shows and handling/show activities provided. Only with this information can the designers properly respond with the required 'back of house' facilities needed to adequately and responsibly manage the required animal collection. The applicant should demonstrate how it has considered and will comply with the EAPA, and how that compliance is reflected in the application currently before the Department of Planning & Environment. One could also ask how the proposal was designed and lodged ahead of a detailed Animal Management and Collection Plan. It would be reassuring to know that your department will apply the same rigour to the TCSA's proposal as that used for the Sydney Aquarium's Sydney Wild Life (SWL) Development Application at Darling Harbour. I recall that unlike the TCSA, SWL did provide a detailed Operations and Animal Management Plan for consideration together with its Development Application.

In closing, the TCSA has ignored approved planning guidelines and the potential impacts on animal welfare in its proposal to build a Taronga Wildlife Retreat. The TCSA proposal aims to further privatise another significant area of what is a Public Zoo by restricting access to a smaller number of high paying customers (National Zoo Canberra is charging between \$1000 - \$2000 per night for a their recently completed Wildlife Retreat - Jamala Lodge). The TCSA's justification for this commercial venture is "Pubic Environmental Awareness" and it calls up survey information from pre and post Roar and Snore experiences to demonstrate the success of such programs. What the TCSA has failed to do is provide follow up survey data or comparative surveys to demonstrate the effectiveness of 'In-situ' conservation work, or the success of educating a greater number of patrons through providing better and broader access to Educational programs within the Zoo Proper. The development of a Taronga Wildlife Retreat in the proposed location will reduce the collection plan again, and Zoo access for general Zoo patrons; degrade the immediate and surrounding environments for exhibiting animals and does not reflect the TCSA's own "Animal Welfare Charter".

Responses by your Department can be made at the following Department of Planning & Environment Web Page. The State Significant Development Application number is SSD15\_7419. The planning office in charge of the assessment is Mr Alexander Scott who can be contacted on Ph. 02 9228 2096 and Email [alexander.scott@planning.nsw.gov.au](mailto:alexander.scott@planning.nsw.gov.au)

[http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=7419](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7419)

Yours Sincerely

Mr Eddie Swat

Certified Practicing Planner (CPP) Planning Institute of Australia

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