Taronga Reptile and Amphibian Conservation Centre (RACC) Mosman
Submission by Linda Bergin OAM

Application Number: SSD-17483577

Minister for Planning and Public Spaces
Taronga Conservation Society Australia

OBJECTION to the construction of a new Reptile and Amphibian Conservation Centre (RACC)

My objection is based on the apparent complete absence of engagement with four key stakeholders as required by SEARS.

- Failure to consult with 2 relevant community groups as required by SEARS
- Failure to consult with 2 listed government authorities as required by SEARS

In addition, public engagement appears to have been massively inadequate.

- Failure to adequately consult with neighboring landowners
- Lack of public visibility – 0 enquiries to dedicated phone # and email address.

Thank you for the opportunity to comment on the DA (Development Application).

I am the Founding and twice President of the Headland Preservation Group Inc. I am presently a member of the Headland Preservation Group Inc. and Mosman Parks and Bushland Association Inc., both based in Mosman. I am a public advocate for heritage sites on Sydney Harbour, and for public parkland. Because of my decades of advocacy, I am frequently asked for news comment and to address groups. I am also an op-ed Contributor to the Sydney Morning Herald.

The proposed new RACC is a very large urban-style building, costing $14.4m, designed to be *"camouflaged"*. Taronga Zoo is a mostly bushland strategic site on the foreshores of Sydney Harbour sloping to the Harbour. It also falls within the Scenic Protection Area (6.4 Mosman LEP) which aims to conserve views from Sydney Harbour. Obviously, the visual impact of the new building has the potential to be substantial.

There appear to be major omissions in TCSA's engagement requirements as required by SEARS.

Apparent failure to consult with Mosman's 2 peak environmental community groups - there was a mandated requirement in the SEARS to consult with "relevant community groups", but they are not listed as even being contacted.

TCSA's initial Scoping Meeting with the Department and Urbis was held on March 25 (EIS page 8) and included *"consultation requirements"* as a *"key area of discussion"*.

Section 5.3 of the subsequent Scoping Report (Request for SEARS) specifically names two community groups (other than members of the local aboriginal community), Headland Preservation Group (HPG) and Mosman Parks and Bushland Association (MPBA). *("Mosman Parks and Gardens"* appears to be a mistake by Urbis I know of no such group).

On April 30, according to the Issued SEARS, *"During the preparation of the EIS (Environmental Impact Statement), you* ***must*** (my bold) *consult with the relevant ...community groups****...as identified in any meeting with the Department before the DA is lodged"*** (my bold). It appears that HPG and MPBA were identified at the March 25 meeting.

However, in Urbis's consultation Outcomes Report (EIS Appendix AA, page 3), neither HPG nor MPB were selected by *"Urbis Engagement and TCSA"* who *"collaborated to select the stakeholders engaged"*. In short, they are missing from the Stakeholders list entirely and do not appear to have ever been contacted.

Apparent failure to consult with 2 government authorities.

The Issued SEARS required consultation *("must")* with a list of government authorities. Two of these are omitted from the Urbis list of Stakeholders, (EIS Appendix AA page 3), being *"Transport for NSW – Roads and Maritime Services"* https://roads-waterways.transport.nsw.gov.au/ and *"Animal Welfare"* https://www.dpi.nsw.gov.au/animals-and-livestock/animal-welfare, which I presume is Department of Primary Industries being the only one.

Urbis concluded early on residents would have no interest in the RACC.

Urbis makes a presumption that there would be little community interest. Section 5.2 of the Scoping Report states that, based on its previous consultations and the

fact that the project is not near residential, it is unlikely to generate interest. This is blatantly false – the new TCSA Wildlife Retreat (hotel), generated considerable interest (for many of the same reasons, bulk and scale, visible from Harbour) and is precisely the same distance from residential as the RACC.

Inadequate consultation with affected landowners and the general public.

Factsheet to Adjacent Residents

The EIS states that *"factsheet...included details of the project"* and was *"letter box drop...to 439 households"*. A copy of the factsheet is included in Appendix AA of the EIS. There were only 2 inquiries. Therefore, the Community information Sessions were cancelled.

It is easy to see why the misleading factsheet, which included BOTH the new Hospital and RACC, generated virtually no interest.

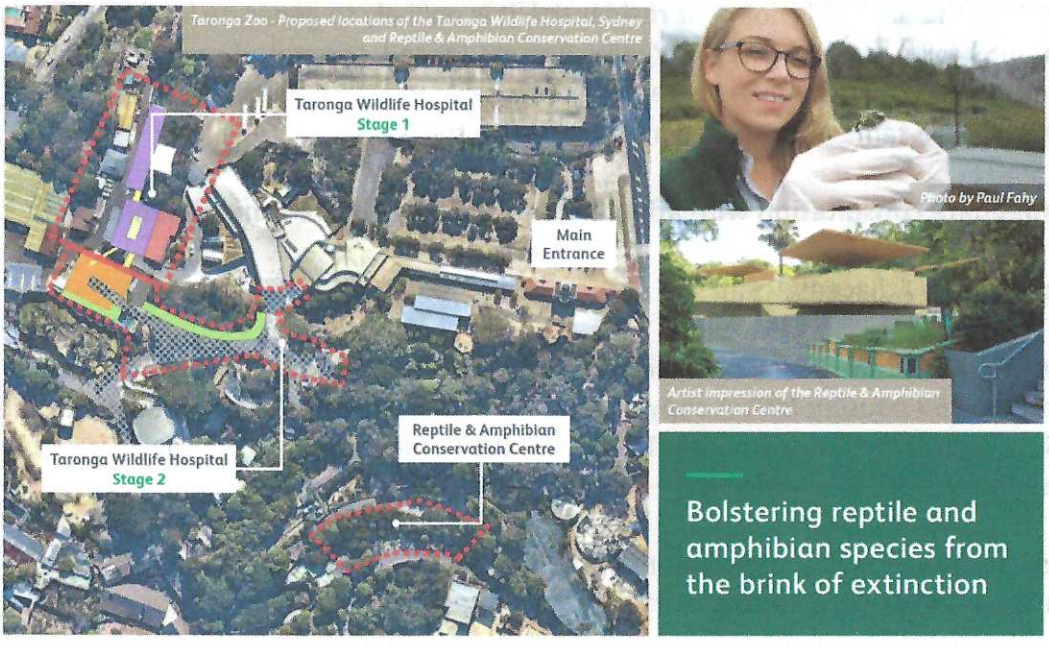
The headline *"Targona Zoo Is Evolving"* – *"Community Update"* - *"Taronga Wildlife Hospital, Sydney and Reptile and Amphibian Conservation Centre"* and the descriptive text on the cover page do not state that this is NEW development. Since TCSA already has a hospital and a "Serpentaria", most would conclude *"evolving"* as some sort of renovation and probably discard the factsheet.

The factsheet included both the new Hospital and the RACC, but with the Hospital on page 2, in a more prominent position.

The RACC on page 3 has insufficient detail. Even though the new Hospital building envelopes are shown within its site, the RACC building envelope is missing within its site, even though it was known at the time. THE RACC BUILDING ENVELOPE ALMOST FILLS ITS ENTIRE SITE (red dotted line). THIS IS A MAJOR OMISSION FROM THE FACHSHEET. The image below from the factsheet.

There is a single, very small *"artist impression"* of the RACC easily missed.

Therefore, most would assume that, rather than a large new building, the RACC would be an upgraded version of Sepentaria, or a simple new enclosure.



The factsheet discloses no costs estimates even though these were available the prior month, April, being $48. 6m for the Hospital and $13.3m for the RACC. That would have immediately given the reader an idea of scale.

In *"Further Details"*, page 4, there is the misleading statement *"the height of the proposed buildings are (*should be "is", grammar error*) the same or lower than existing"*. This is misleading because the RACC is being built on a new site that has no existing building.

<u>Social Media Advertisements</u>

The consultation Outcomes Report Appendix AA does not contain a copy of the Facebook ad which ran for 1 week at the end of May, nor the comments it elicited (if any). The ad was deleted by Facebook.

Despite a *"reach"* of 33,122 users, the ad generated only around 80 clicks per day.

There are no other posts about the project that I could find on the TCSA's Facebook page (other than the initial November 2020 launch which had no detail).

Other Advertising

There was no public notice in any local paper, this requirement was removed from the EP&A Regulations in April 2020.

There was no story in the print Mosman Daily, however there was a Mosman Daily online story but behind a paywall (Daily Telegraph).

TCSA Website

There is almost no information about the RACC on the TCSA website.

The "Project Website" https://taronga.org.au/about/building-a-better-zoo gives no details about the size of the RACC. Nor does it provide a link to the NSW Major Projects Portal, even though it is presently on public exhibition.

Similarly, https://taronga.org.au/about/building-a-better-zoo TCSA's fundraising site gives no details of the RACC and is mostly about the new Hospital.

Engagement Feedback

The ONLY feedback, from a list of 31 organisations or individuals, is listed below. Otherwise "none", "thank you" or "include in electorate communications". There was NO feedback from the Mayor of Mosman or ANY Councilor, surprising for a nearly $80m development in the municipality.

There is no mention of the new Hospital or RACC in any Council Minutes for 2020 and 2021.

- TCSA staff and volunteer - positive
- TAAG (Taronga Aboriginal Advisory Group) – important feedback on design
- Mosman Council Executive - supportive

Of the 439 letterbox drops to adjacent households, there were only 2 inquires.

Communications to TCSA Members, visitors, and guests generated NO feedback. There must be thousands of names on this combined list?

There were no inquiries to the dedicated phone number and email address.

Visual Impact

The Scoping Report says, *"An architectural wall is proposed along the southern façade of the building to provide screening...This feature will also ensure that the built form is not highly visible from Sydney Harbour."* It is referred to as a *"camouflage element"* in the context of views from Sydney Harbour.

The EIS states *"The project will not materially impact on the present view of 'green vegetation' from the harbour as illustrated in the photomontage contained with the package of Architectural drawings in Appendix E. The proposed built form scale and appearance is compatible with the characteristics of the zoo and will not be readily visible when viewed from the Harbour as it remains below the existing tree canopy".*

Apparently, no formal Visual Impact Assessment will be undertaken.

"Taronga Zoo Master Plan – Urban Design Principles and Visual Analysis", May 2001 and published on the Department's Major Projects website shows an area in red along the Zoo foreshore where *"built form elements are to be minimised due to high visual exposure as viewed from the harbour"* Figure 2.5.2. The proposed new RACC is directly adjacent to this zone, as shown overlaid on Google Earth with the RACC building location shown in white.

2.5 *Scale and quality of development: Built form sensitivity areas; Topography*

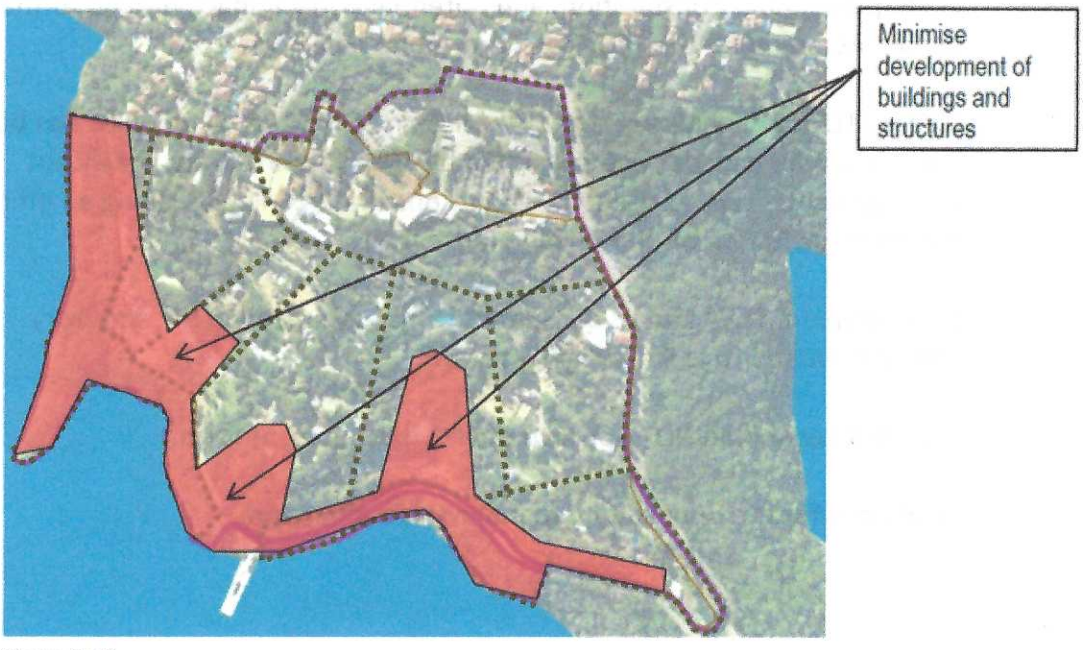


Figure 2.5.2
Extent of areas where built form elements are to be minimised due to high visual exposure as viewed from the harbour

Conclusion

For the reasons stated above namely, failure to follows the SEARS requirements, inadequate public consultation, and potential visual impact with no formal Visual Impact Assessment, the TCSA's EIS cannot be relied on.

Clearly, TCSA is highly aware of both HPG and MPBA, each of which has been established for decades and consulted by TCSA for past State Significant Developments. I was present at such a consultation in 2016, being an officer of HPG, for the consultation on the Wildlife Retreat.

In my opinion, TCSA and its consultant Urbis have erred in the statutory requirements for this State Significant DA.

The Minister should NOT approve the DA in its present form.

Thank you for the opportunity to make this submission.

Yours truly,

Linda Bergin OAM
Millers Point NSW

August 26, 2021