



CC/TW
15247
22 August 2016

(redacted)
Director, Industry Assessments
Department of Planning and Environment
23-33 Bridge Street
SYDNEY NSW 2000

Attention:

Dear (redacted),

**SSD 7228: SYDNEY ZOO - RESPONSE TO SUBMISSIONS
WESTERN SYDNEY PARKLANDS**

JBA is submitting this additional response to submissions on behalf of Sydney Zoo Pty Ltd, the proponent for the proposed Sydney Zoo SSD application currently being assessed by the Department of Planning and Environment (DPE).

The EIS was publicly exhibited, in accordance with Section 83 of the *Environmental Planning and Assessment Regulations 2000*, between 10 December 2015 and 8 February 2016. During this exhibition period, submissions were invited from all stakeholders including members of the community and government agencies. A total of 56 submissions were received, with 46 from the community, landowners and special interest groups, and 10 from government agencies. The submissions received from the EIS exhibition were then addressed within the Response to Submissions (RTS) report, with submissions on the RTS received from six government agencies and private organisations, and two individuals.

This letter acts as an addendum to the RTS and addresses concerns raised by the two individuals, and five government agencies and private organisations including:

- Roads and Maritime Services (RMS);
- Transport for NSW (TfNSW)
- Office of Environment and Heritage (OEH);
- Environment Protection Authority (EPA);
- Blacktown and District Environment Group; and
- Urbis, on behalf of Elanor Investors Group (the owner of Featherdale Wildlife Park).

The main concerns raised by submitters include:

- Water quality;
- Composting;
- Impact on flora and fauna species;
- Consultation; and
- Socio-economic impacts.

In support of this additional RTS response, additional technical studies and further information is provided:

- Supplementary EPA Response prepared by Lindsay Dynan (**Attachment A**);
- Proposed Water Sampling Protocol prepared by Consulting Earth Scientists (**Attachment B**);
- Ecological Matters and Credits Calculator Score prepared by EcoLogical Australia (**Attachment C**);
- Final Aboriginal Cultural Heritage Assessment Report prepared by Artefact (**Attachment D**);
- The draft Memorandum of Understanding between Sydney Zoo and Muru Mittigar which has now been signed (**Attachment E**);
- Detailed socio-economic response prepared by Sydney Zoo and JBA (**Attachment F1 and F2**); and
- Sydney Zoo marketing and comparative materials (**Attachment G**).

1.0 TRANSPORT AND TRAFFIC

RMS and TfNSW provided additional submissions in response to the RTS report, with RMS identifying that they had no further comments based on the information provided.

TfNSW identified that all matters raised in its original submission have now been dealt with appropriately by the Sydney Zoo, subject to recommended conditions as summarised below:

- Operational Transport Management Plan (OTMP)
 - An OTMP should be prepared to detail the management of parking, traffic and transport during high visitation demand, with details of how demand for parking will be monitored. The OTMP should outline any potential impacts to general traffic, cyclists, pedestrians and bus services during these periods and identify traffic management measures to mitigate these impacts.
- Swept Path Analysis
 - Additional swept path analysis should be provided demonstrating that the largest vehicle can enter and exit the proposed site access, car park and loading areas.
- Travel Demand
 - A Workplace Travel Plan should be prepared to encourage non-car transport for employees, including measures to encourage public and active transport options through the provision of bicycle parking, footpaths and connectivity to the wider area, and other travel demand measures including employee incentives and flexible work hours.
- Construction Traffic Management Plan (CTMP)
 - A CTMP should be prepared to identify potential impacts to general traffic, cyclists, pedestrians and bus services during the construction of the project. The duration and extent of impacts should be identified and mitigation measures proposed.

Sydney Zoo considers these proposed conditions acceptable.

2.0 WATER QUALITY

One public submission and the submission from the Blacktown and District Environment Group raised concerns about water quality entering Eastern Creek, and the potential impact of this on fish species. The EPA also raised concern with the modelling undertaken, namely regarding the assumptions used to calculate the potential impact in the stormwater modelling program.

A meeting was held with representatives of the EPA and DPE on 4 August 2016 to discuss the stormwater management issues. Comments from that meeting have been incorporated into this response.

2.1 Response

Lindsay Dynan have prepared a supplementary water quality assessment report in response to the concerns raised by submitters and the EPA (attached at **Attachment A**).

As outlined in the EIS submission and the Stormwater Management Plan (SMP) prepared by Lindsay Dynan in support of the EIS, Blacktown City Council provide stringent pollutant reduction targets for stormwater management (**Table 1**). The SMP used the industry accepted method of MUSIC modelling to determine the pollutant amounts and reductions associated with the Sydney Zoo stormwater management strategy.

Table 1 – Pollutant Reduction Targets

Pollutant	Reduction Target
Gross pollutants	90%
Total suspended solids (TSS)	85%
Total phosphorus (TP)	65%
Total nitrogen (TN)	45%
Total Hydrocarbons	90%

The MUSIC model utilises ‘nodes’ to calculate impacts and pollutant levels. Blacktown Council provide their own nodes for use in their Local Government Area which generally produce pollutants in higher concentrations than the default MUSIC nodes, providing a conservative approach to pollutant reduction.

With the Zoo being a rare development in Sydney and Australia, there is no specifically suitable node for modelling water quality which would appropriately reflect the potential impacts from zoological operations. The closest ‘match’ in the immediate area of the site would be the recently released Agricultural node from Blacktown Council. Consequently, remodelling has been completed using the following nodes:

- Urban (impervious), for sealed and unsealed roads within the Zoo, footpaths and roof areas;
- Urban (pervious), for general grassed areas, picnic areas and environmental protection areas;
- Road, for the car parking area; and
- Agricultural, for animal enclosures.

Existing water quality

Consulting Earth Scientists conducted surface water monitoring in Eastern Creek in June 2016, with samples collected from three locations – downstream, upstream and at the location of potential discharge from the Zoo site. Laboratory analysis indicated that Total Nitrogen, Ammonia, Enterococci and Total Phosphorus levels were elevated above the relevant criteria from the Australian and New Zealand Environment Conservation Council (ANZECC) Guidelines for Fresh and Marine Water Quality 2000. Other water quality measures including pH, total suspended solids and chlorophyll were below the criteria. Noting the results, the water quality of Eastern Creek appears to be deteriorating as it flows to the north.

Adopted water pollution control measures

A number of water treatment devices are proposed throughout the Zoo, including grassy buffers and swales, bio-retention basins, oil and water separators and the proposed stormwater harvesting ponds. These devices, along with proprietary devices for hydrocarbon removal, have been revised

into the MUSIC model, which also incorporates the more stringent Agricultural node as discussed above, resulting in the below updated pollutant reduction results.

Table 2 – Pollution reduction results for the revised MUSIC model

Pollutant	Sourced (kg/yr)	Residual (kg/yr)	Reduction	BCC Requirements
Total suspended solids (TSS)	30,100	876	97.1%	85%
Total phosphorus (TP)	22.3	3019	85.7%	65%
Total nitrogen (TN)	133	27.1	79.6%	45%
Gross pollutants	1,150	0.0	100%	90%

As shown above, the proposed treatment train effectively reduces the pollutants far in exceedance of the pollutant reduction requirements.

Discharge to receiving waters

As outlined in the EIS, there are three on-site detention storage basins proposed. Each basin has a separate discharge location – one to the west of the site to Eastern Creek, one to the north-east to a proposed easement, and one to the south-east to the future access road.

MUSIC modelling undertaken across the site identified the discharge concentrations at each location, and indicate that the calculated discharge would be either at or below the accepted guidelines, or below the existing background levels in Eastern Creek. The results take into account the proposed on-site stormwater harvesting storage.

Table 3 – Summary of discharge concentrations

Pollutant	Design Annual Average concentration (mg/L)	ANZECC Guideline (mg/L)	Background Concentration (mg/L)
Total suspended solids	40.37	40.0	17.0
Total phosphorus	0.15	0.05	0.17
Total nitrogen	1.25	0.50	2.00
Gross pollutants	0.0	N/A	N/A

Proposed water monitoring

Consulting Earth Scientists have outlined a proposed water quality monitoring process for implementation during operation of the Sydney Zoo, provided at **Attachment B**. The proposed monitoring aims to facilitate a detailed water quality assessment of discharge from the site to identify the effectiveness of the proposed treatment train.

Sampling will be undertaken at two discharge locations within the Sydney Zoo site, and four locations external to the zoo site – being Eastern Creek to the west and the wetland to the northeast. These samples will be collected during discharge events at a frequency of at least once per month, for the first six months, and once every two months in the next six-month period. A review will be conducted at the completion of the monitoring to determine if further monitoring is required. In addition to this report, results of the sampling and laboratory analyses will be provided to the EPA within 2 weeks of each sampling event.

The sampling will involve field measurements of standard water quality parameters, and then further laboratory analysis by an accredited NATA laboratory. Refer to the process outlined in the attached.

3.0 COMPOSTING

The EPA raised a concern regarding the management of water pollution from composting on the site. It is noted that the EIS included an assessment of the composting activity in relation to air quality (odour) and no further issues have been raised in this regard. The EPA also recommends that nutrient and salt balance assessments be completed in order to determine the capacity of the landscaped areas at the site to receive the site composted materials.

If progressed, on-site composting would occur within the works depot area, in the north-western corner of the zoo. Composting would be limited to a maximum of 369 tonnes per annum, comprising green waste, vegetable feed waste and manure, with manure comprising up to 75% of the total volume. This estimate is conservative in that it assumes all manure generated on site will be collected for composting. Further, composting would be limited to the amount of composted material that can be utilised for fertiliser on the landscaped areas of the zoo. If the zoo generates higher amounts of compostable waste materials than could be utilised at the site, then these materials would be taken to a suitably licenced off-site composting or disposal facility.

A detailed design of the composting area has not been prepared, however it would be designed to comply with the EPA's Environmental Guidelines for Composting and Related Organics Processing facilities. In particular:

- The composting area (including the active composting pad) would be constructed of concrete or similarly impervious material to prevent leachate polluting the subsoil.
- A leachate collection system will be included which involves collecting leachate in above ground storage tanks contained in a bund with a 110% capacity of the tanks within the bund.
- The composting area will be designed so that overland flows do not enter the composting area and covered to prevent stormwater being collected in the leachate collection system.

It is therefore requested that the proposed composting activity be subject of conditions of consent as follows:

- Prior to the commencement of construction of the composting area Sydney Zoo would provide details of the design for the area to the EPA and DPE to ensure the above standards are met.
- Prior to the commencement of any composting nutrient and salt balance assessments will be submitted to the EPA and DPE establishing the maximum amount of composted materials that can be utilised at the zoo site as fertiliser the landscaped areas.
- Composting at the zoo will not exceed the amount able to be utilised at the zoo site as fertiliser the landscaped areas.
- No compostable materials will be received from off-site sources, and no on-site composted materials will be taken off-site.

With consideration of the above, if composting is not progressed at Sydney Zoo then compostable waste materials will be disposed or composted off-site at a suitably licenced facility.

4.0 IMPACT ON FLORA AND FAUNA

One public submission and the submission from the Blacktown and District Environment Group raised concerns regarding the impact of the removal of vegetation on the site. This has previously been addressed in the original EIS and subsequent RTS reports submitted to the Department.

The OEHL provided further responses to the RTS report around the calculation of offset credits required for the Sydney Zoo project. Specific responses to these issues are provided in **Table 4** below. The Sydney Zoo requires five credits under the Offset Policy, as calculated. An updated credit calculator report is provided in **Attachment C**. These credits are currently being sourced.

Table 4 – Response to the OEH comments received

OEH Comments 8/02/16	Sydney Zoo Response to Submissions May 2016	OEH Response June 2016	Sydney Zoo RTS Response
<p>The proposal (as exhibited) is not consistent with the NSW Biodiversity Offsets Policy for Major Projects.</p>	<p>As highlighted in the December 23rd letter Sydney Zoo is of the opinion that the Offsets Policy presents a number of difficulties in its practical application to the current proposal. A meeting with OEH was held on 21 April 2016 to discuss the methodology of the Offsets Policy. It is noted that OEH are currently undertaking a review of the methodology for assessment of applications. Under the amended proposal, it is anticipated that approximately eight credits would potentially be required, however this would be subject to confirmation of the OEH's Policy with respect to the 0.25ha threshold.</p>	<p>OEH clarified the application and methodology of the Offsets Policy in relation to the project.</p>	<p>Sydney Zoo has re-run the calculations based on the advice received in the OEH letter and confirms that 5 credits are required for the HN528 vegetation on the Sydney Zoo site (see Attachment C). These credits are currently being sourced.</p>
<p>OEH has concerns that the Cumberland Plain Woodland (CPW) proposed for retention within a carpark setting may not meet the definition for CPW in perpetuity given the small patch sizes, degree of isolation, large edge to area ratios and the proposed incompatible surrounding land use.</p>	<p>Sydney Zoo has proposed several measures to improve the connectivity of the existing stands of vegetation and also to augment existing stands by planting mid storey and understorey plants. As part of its management and impact avoidance strategy, Sydney Zoo has proposed to fence off and actively manage the existing stands to ensure that they are maintained. This represents an improvement on the current condition of the in-place stands. Refer to the Sydney Zoo CPW Vegetation Management Plan and weed risk management plan for further details on this in Appendix E and Appendix J.</p>	<p>OEH notes that the 'Indicative CPW Management Plan includes discussion of the period of implementation of the plan. OEH understands that the plan is to be implemented in perpetuity.</p>	<p>Sydney Zoo can confirm that the CPW Management Plan will be implemented in perpetuity.</p>
<p>OEH notes the Landscape Masterplan does not identify any plantings within the retained CPW patches to improve their condition, nor does the duration of the Landscape Masterplan appear to be specified. Given these considerations, any proposal to more directly impact these areas in the future may result in their complete removal and no requirement for offsets.</p>	<p>A planting strategy and planting plan for the CPW areas identified in drawing L17 of the landscape master plan is currently in the process of being developed (noting further detailed design is to occur). This includes species identification, plant spacing and species mix, mulching and spoil preparation strategies and suppliers of endemic seeds. A copy of this report is provided in Appendix E. As per discussions held with OEH, a framework for the management of the CPW is provided at Appendix R.</p>	<p>The Planting Strategy appears to largely relate to landscaping areas proposed to be planted with native species throughout the car park and zoo, and not the 'retained' CPW patches. It is expected that once the CPW Plan of Management (POM) is prepared, it will include a planting strategy. Note: the plant species <i>Rhodanthe anthemoides</i> should be removed from the planting schedule as it is not commonly found in CPW, and it should be replaced with a more appropriate species such as <i>Chrysocephalum apiculatum</i> and/or <i>Senecio hispidulus</i>.</p>	<p>The CPW Plan of Management will include a Planting Strategy for the site. The recommendation to change the plant species is noted and will be implemented accordingly.</p>

OEH Comments 8/02/16	Sydney Zoo Response to Submissions May 2016	OEH Response June 2016	Sydney Zoo RTS Response
<p>Although the potential for these small patches to degrade further under the current land use is recognised, it is OEH's opinion that the proposed development (as exhibited) would likely result in their demise in the long run and therefore, the 'retained' areas of CPW should be assessed as though they are to be removed. Note the following requirements from the FBA:</p> <p>s. 8.3.1.2 <i>"The proponent must incorporate the principles of avoiding and minimising impacts to biodiversity into the entire life cycle of the Major Project consistently with the guidelines in Subsection 8.3.2"</i>.</p> <p>s. 8.4.1.2 <i>"When assessing indirect impacts, the assessor must consider all adverse impacts that can reasonably be predicted to result from the development. The assessor must consider indirect impacts on biodiversity where they are sufficiently related to the development to be considered a consequence of the development"</i>.</p>	<p>This is not consistent with standard ecological framework and the Framework for Biodiversity Assessment, all of which seek avoidance as the number 1 priority, followed by mitigation as number 2, with offsetting only required once these actions have been undertaken. The Sydney Zoo proposal will increase the area of CPW present, and improve its quality. Additionally, a management plan is being prepared (refer to structure in Appendix R) which will ensure the maintenance and rehabilitation of CPW in perpetuity. This approach has been discussed with and approved by OEH. It should be noted that the proposed car park amendment reduces the impact on the River Flat Eucalypt Forest, and decreases the total area of vegetation to be impacted to less than 0.25ha.</p>	<p>OEH notes that the application includes a commitment to implementing the CPW POM but OEH has not been forwarded any evidence of support from the University of Western Sydney and Miru Mittigar regarding proposed collaborations. OEH assumes that if the collaborations do not eventuate, that the applicant will still implement the CPW POM.</p>	<p>Sydney Zoo can confirm that a Memorandum of Understanding between Miru Mittigar has been drafted and signed – and is provided in Attachment E.</p> <p>Western Sydney University, as per the previously submitted letter, are to undertake collaborative efforts with Sydney Zoo in managing the CPW on-site as required.</p> <p>The CPW Management Plan will be implemented in perpetuity.</p>
<p>Sydney Zoo identifies an "intended collaboration" with universities and Aboriginal agencies with respect to urban bushland regeneration and maintenance. Sydney Zoo wishes to explore whether such a collaboration would provide comfort to OEH as to the long-term security of the retained patches of CPW. In this regard, and to satisfy the requirements of the FBA, OEH requires more than an "intended collaboration" and would need to see a specific management plan for the retained patches to demonstrate the measures to be employed to enhance and then manage them as CPW in perpetuity. It would be expected that such a plan would include the identification of: threats resulting from the development (for example, but not limited to, trampling, rubbish dumping, weed invasion); specific measures to be implemented for example, but not limited to, planting of CPW species of local provenance, installation of an access deterrent such as bollard fencing, weed removal program; who will undertake the works (with evidence of their commitment/engagement and qualifications and experience in CPW bush regeneration); and, how the on-going management would be funded. Any approval of the project would require the management plan to be implemented in</p>	<p>Refer to Appendices E, J and R for the CPW Management Plan, Planting Strategy and Weed Risk Management Pro-Forma and Appendix H for written confirmation from the Western Sydney University and Muru Mittigar regarding proposed collaborations. Furthermore, the retained patches of CPW will be appropriately managed through the appropriate management plan (refer to the structure in Appendix R), which will address standards of fencing, watering, maintenance and planting.</p>	<p>As above.</p>	<p>As above.</p>

OEH Comments 8/02/16	Sydney Zoo Response to Submissions May 2016	OEH Response June 2016	Sydney Zoo RTS Response
<p>perpetuity. It should be noted that it may be difficult to demonstrate that the smaller and more isolated patches of CPW proposed for retention could be effectively managed and maintained as CPW in the long-term and therefore, OEH may still require offsets for these smaller patches identified as FID 2 and FID 5 within the 'Footprint' shapefile.</p>			
<p>OEH previously raised the concern that the proposal does not satisfy the objective to "improve biodiversity and bushland quality within the precinct" specific to the Bungarribee Precinct of the Western Sydney Parklands Plan of Management. OEH provided a list of studies to support the opinion that recreation of CPW at a ratio of only 2.1:1 compared to the area being cleared, will lead to a net loss of biodiversity values over time. The letter from Jake Burgess dated 23 December 2015 claims the ratio is sufficient given historical ratios however, no examples were provided.</p>	<p>Following discussion with OEH it is clear that there is no ability to offset on-site, and this comment is now dealt with.</p>	<p>Noted.</p>	<p>As per above five credits are required and are currently being sourced – see Attachment C.</p>
<p>As previously advised by OEH in our letter dated 1 December 2015 there may be potential for Biobanking credits to be established and secured by the WSPT in order for the lessee of the site to achieve the desired project outcomes and meet relevant objectives. This would be a matter for the WSPT and Sydney Zoo to investigate.</p>	<p>As discussed further in Section Error! Reference source not found., Sydney Zoo proposes to modify the design of the car park to remove its footprint from the area of River Flat Eucalypt Forest. The retention of that area therefore removes any need for credits to be sourced based on prior operational policies. Sydney Zoo notes that OEH is currently reviewing the Policy's implementation.</p>	<p>As advised in the attached letter, offsets are required for the 0.24ha of CPW to be removed.</p>	<p>As per above five credits are required and are currently being sourced – see Attachment C.</p>
<p>It is unclear why Plots 1, 7, 8 and 9 have been included in the calculator as HN526 when they are HN528. It is also unclear why Plot 6 has been included in HN526 if it is in a zone mapped as 'exotic'.</p>	<p>The Biodiversity Assessment Report identifies that the HN528 zone is too small for assessment on its own, and thus was merged with the larger area of HN526. This follows standard assessment protocol. It is agreed that the inclusion of Plot 6 in HN526 is an error.</p>	<p>Please note that the merging of PCTs is not standard assessment protocol where the FBA applies. OEH has not received an updated version of the credit calculator, but assumes that these changes have been made.</p>	<p>An updated credit calculator is provided in Attachment C.</p>
<p>It is noted that part of the CPW area in the vicinity of Plot 1 that is mapped in the 'footprint' layer as being 'retained' is also mapped in the 'vegetation zones' layer as 'exotic'.</p>	<p>Noted. There is some area which is mapped as exotic to the north and around the edges of this plot which will be kept. This is a protective buffer for the in place CPW and Sydney Zoo will seek to improve the viability of this stand, which will also be planted with species native to CPW.</p>	<p>Noted.</p>	<p>No further comment.</p>

OEH Comments 8/02/16	Sydney Zoo Response to Submissions May 2016	OEH Response June 2016	Sydney Zoo RTS Response
<p>Landscape Masterplan Part 15 (DWG L22 Rev A) is not consistent with the GIS shapefile for 'retained' land: the plan shows 'asphalt car park' over the northern part of the largest 'retained' patch of CPW. However, part of this area is also mapped as 'exotic'; see above. Please clarify the extent of land to be 'retained'.</p>	<p>Drawing L22 was illustrative as a demonstration of car park zones, it inaccurately shows impact on the patch referenced that is different from the actual plans. This has been amended. The area contains both exotic and CW species as there is a construction buffer established around the CPW to assist in its preservation</p>	<p>Noted.</p>	<p>No further comment.</p>
<p>OEH notes that surveys were undertaken at a suitable time of year for all the flora species except potentially <i>Pimelea spicata</i>. <i>Pspicata</i> can appear any time of year but mostly in summer, and can be difficult to detect when not in flower. As no surveys were done in summer, what further justification can be provided to be certain the species does not occur on site? Were any reference populations known to be flowering at the time of survey?</p>	<p>According to the "Survey time matrix" from the assessment tool and Threatened Species Profile Database, <i>Pimela spicata</i> can be surveyed for at any time of year (Jan - Dec). Survey did not detect this species, and the habitat was disturbed with little understorey, so there would have been a high likelihood of detecting this species, if present.</p>	<p>Noted.</p>	<p>No further comment.</p>
<p>OEH notes that no camps of Grey-headed Flying-fox or maternity caves of the Little Bentwing-bat were recorded on site. The BAR does state however, that up to two trees with hollows suitable for microbats would be removed. Tree hollows provide potential roosting habitat for the Little Bentwingbat. Given this, and the SEARs' requirement to address s.9.2 of the FBA for impacts to Little Bentwing-bat roost sites, OEH requires evidence that the species is unlikely to roost on site (by undertaking targeted surveys for the species; to date, only habitat assessment has been undertaken) and/or s.92 of the FBA is to be addressed.</p>	<p>Those species are not predicted by the tool (either as an ecosystem credit species or a species credit species). Therefore, no survey is required according to the assessment methodology.</p>	<p>Noted.</p>	<p>No further comment.</p>

5.0 CONSULTATION

One submission received from Urbis (on behalf of Elanor Investors Group, the ASX listed entity that owns the Featherdale Wildlife Park) outlines that they consider inadequate consultation was undertaken. The following is a response to that claim which has previously been responded to within the EIS and RTS reports.

Consultation for the Sydney Zoo project prior to lodgement of the EIS was undertaken through a range of channels, including emails, phone conversations, formal and informal briefings and letter submissions. Feedback provided from stakeholders and the community assisted with the design of the proposal as submitted in the EIS.

Table 5 – Key consultation activities undertaken

Date	Authority or Organisation	Type of discussion
29 May 2015	The Office of the NSW Premier <ul style="list-style-type: none"> ▪ Senior Policy Advisor 	Briefing
12 June 2015	Blacktown City Council <ul style="list-style-type: none"> ▪ Mayor and Councillors ▪ General Manager 	Stakeholder meeting
12 June 2015	Western Sydney University <ul style="list-style-type: none"> ▪ Director of Strategic and Government relationships 	Stakeholder meeting
25 June 2015	NSW Department of Premier and Cabinet <ul style="list-style-type: none"> ▪ Senior Regional Coordinator, Greater Western Sydney 	Informal briefing
21 August 2015	<ul style="list-style-type: none"> ▪ Busways ▪ Transport for NSW 	Email correspondence
11 September 2015	Blacktown and District Environment Group	Phone conversation
18 September 2015	State Member for Prospect	Briefing
13 October 2015	Exhibited Animals at the NSW Department of Primary Industries <ul style="list-style-type: none"> ▪ Leader 	Email correspondence
14 October 2015	Western Sydney Local Health District <ul style="list-style-type: none"> ▪ Chief Executive 	Email correspondence
15 October 2015	Environment Protection Authority <ul style="list-style-type: none"> ▪ Senior Environment Protection Officer 	Email correspondence
20 October 2015	Transport for NSW	Briefing
22 October 2015	Elanor Investors Group (Featherdale) <ul style="list-style-type: none"> ▪ Chief Executive Officer 	Email correspondence
22 October 2015	Office of Environment and Heritage <ul style="list-style-type: none"> ▪ Senior Operations Officer ▪ Regional Biodiversity Conservation Officer Department of Planning and Environment <ul style="list-style-type: none"> ▪ Senior Planner 	Briefing
28 October 2015	Blacktown Police	Initial briefing and meeting regarding emergency access etc. Discussions ongoing.
1 December 2015	Muru Mittaggar Ltd <ul style="list-style-type: none"> ▪ Chief Executive Officer 	Email Correspondence

The SEARs required that Sydney Zoo consult with the following bodies as described in **Table 6** below. The date of correspondence with those bodies has been recorded, and the date of any response received

Table 6 – SEARs consultation requirements compliance

SEARs Consultation Requirement	Date of correspondence
Western Sydney Parklands Trust	Frequent throughout preparation of EIS, including the request of landowner's consent for lodgement of the application.
Blacktown City Council	12 June 2015, 3 August 2015, 16 October 2015. Briefings to inform Council of the proposal, and ongoing discussion, including in relation to stormwater management
Department of Primary Industries: Exhibited Animals Advisory Committee	13 October 2015
Department of Primary Industries: Office of Water	12 October 2015
Commonwealth Department of the Environment	N/A – due to the lack of any items or locations of Commonwealth significance.
NSW EPA	12 October 2015
WorkCover NSW	13 October 2015
NSW Health	13 October 2015
Office of Environment and Heritage	12 October 2015
Featherdale Wildlife Park	12 October 2015, with a follow up meeting on 13 April 2016
Taronga Zoo	13 October 2015
Transport for NSW	6 October 2015
Roads and Maritime Services	6 October 2015
Busways and any other public transport provider	6 October 2015

Additionally, consultation was undertaken with:

- Western Sydney University;
- University of Sydney;
- TAFE NSW;
- Blacktown and District Environment Group; and
- Muru Mittaggar Ltd.

The Western Sydney Parklands Trust has been consulted throughout the entire preparation of the EIS, as was the Office of Environment and Heritage and Blacktown City Council.

Featherdale Wildlife Park was originally consulted on 29 July 2014 about the Sydney Zoo proposal with an option presented for the owners, Elanor Investments, to invest in Sydney Zoo. Further correspondence in October 2015 informed Elanor Investors Group of the status of the EIS preparation.

As outlined within the RTS report, a further meeting was held in April 2016 with Elanor. The outcomes of that meeting were identified and emailed to Elanor, who responded with an indication of willingness for future discussion and collaboration.

6.0 SOCIO-ECONOMIC IMPACTS

Urbis, on behalf of Elanor Investors Group, the owners of Featherdale, provided a further response which raised concerns around the socio-economic impacts of the proposed Sydney Zoo.

Each of the issues outlined by Elanor in its original submission were addressed by the Applicant in the Response to Submissions. This was done by summarising all public submissions received and categorising them by reference to the issue raised. As such all issues were dealt with in an objective fashion reflecting the weight of concern raised within the community.

Refer to **Attachment F** for a detailed response to the Urbis submission, prepared by Sydney Zoo and JBA. We note that Urbis has made a number of statements about the socio-economic programs and benefits of Featherdale, however the submission provides no evidence substantiating these claims.

The proposal will deliver a much needed iconic tourism and recreation facility in Western Sydney and offer the people of Western Sydney diversity of choice. In doing so it will improve the social and cultural amenity for the community. Attached at **Attachment G** is further information regarding the context and key characteristics of the Sydney Zoo proposal, including a comparison of Sydney Zoo to Featherdale, clearly demonstrating the obvious and substantial differences between the two facilities.

7.0 IMPACT ON ABORIGINAL HERITAGE

An Aboriginal heritage assessment of the proposed Sydney Zoo site was prepared in 2015 and included as part of the EIS. The assessment identified the location of three previously recorded Aboriginal sites located within the study area and two areas of potential archaeological deposit (PAD) – SZ PAD01 and SZ PAD02. The three previously recorded sites were considered to be of low archaeological significance and no further archaeological investigation was recommended in relation to their removal.

SZ PAD01, which is located adjacent Eastern Creek, was identified as likely to contain archaeological deposits considered to be of moderate archaeological significance based on previous subsurface archaeological investigations in similar landforms within the Bungaribee Precinct. However, Sydney Zoo would only be partially impact this PAD, with impacts limited to a small portion of the eastern boundary of the PAD encroaching a maximum 8m into the PAD area.

SZ PAD2 will be directly impacted by the proposal, resulting in total loss of value. Archaeological test excavation was recommended at SZ PAD02 to determine the extent and archaeological significance of PAD in that area.

The Aboriginal heritage assessment recommended that, following a test excavation program at SZ PAD02, an Aboriginal Cultural Heritage Assessment Report (ACHAR) be prepared for the proposal that:

- includes the results of consultation with registered Aboriginal stakeholders,
- provides an assessment of cultural significance,
- provides a final impact assessment and
- provides final management measures.

The ACHAR (redacted to remove personal information) is provided at **Attachment D**. Following the preparation of a test excavation methodology and consultation with the Aboriginal community a test excavation program was conducted within SZ PAD02 over four days between 26 April and 29 April 2016. An Archaeological Test Excavation Report has been prepared (provided as part of **Attachment D**) that outlines the findings of archaeological test excavation at SZ PAD2 and assesses the archaeological significance of the PAD.

The test excavation identified two low density dispersed artefact scatters within SZ PAD02. These sites, SZ AS01 (#45-5-4772) and SZ AS02 (#45-5-4771) were assessed as demonstrating low archaeological significance and no further investigation is recommended. An appropriate reburial location for impacted artefacts will be chosen based on consultation with registered Aboriginal stakeholders, Sydney Zoo and the WSPT.

The ACHAR also concluded that the impacts to SZ PAD01 are considered to be of such a minor nature that salvage excavation is not required to mitigate these impacts.

The ACHAR includes recommendations to prevent the inadvertent impacts to those portions of SZ PAD01 outside the impact area, including through the inclusion of the following in the Construction Environmental Management Plan:

- Establishing no-harm areas where appropriate.
- Using visual markers around no-harm areas, such as temporary fencing, high visibility tape, and temporary signage.
- Provide clear guidance to all site workers on access restrictions to no-harm areas.
- Unexpected finds procedure, including procedures for human remains.

8.0 CONCLUSION

Based on the above and information previously provided to the Department, it is considered that all relevant information has now been provided. Consequently, we trust that an appropriate assessment can now be finalised for determination by the Planning and Assessment Commission.

Should you have any queries about this matter, please do not hesitate to contact me on (redacted).

Yours sincerely,