



**TARONGA REPTILE and AMPHIBIAN CONSERVATION CENTRE**

**APPLICATION NUMBER: SSD-17483577**

Minister for Planning and Public Spaces  
Taronga Conservation Society Australia

**OBJECTION** to the construction of a Reptile and Amphibian Conservation Centre (RACC), relocated from the current Serpentina location, to provide a new exhibit and experience

**Our objection is based on the lack of engagement with stakeholders**

The Mosman Parks & Bushland Association was established in 1964 when a road was bulldozed across Bradleys Head. The Association's objectives continue to be the protection of parks, bushland, open space, and natural features in Mosman for the benefit of present and future generations.

A particular concern of the Association which is of relevance to this development is the Scenic Protection Area (6.4 Mosman LEP) which aims to conserve views from Sydney Harbour.

**In praise of the zoo**

Mosman Parks & Bushland appreciates and admires the conservation work of the zoo. Conservation, education, and research are vitally important in this age of climate change and loss of habitat. The Research Centre is excellent in terms of its capabilities. The indigenous programme and staffing are exciting and producing great results. Saving the Bellingen turtles and the attempt to teach the male Regent honeyeater its song have been particularly poignant recent tales from the wild. The Zoo's education mission is taken very seriously with all ages and stages catered for. Demonstrations and talks are excellent, and wonderful on-line work has been done for children during Covid. The zoo's conservation of reptiles and amphibians has been a primary and successful focus.

**LACK OF ENGAGEMENT**

**WE BELIEVE THAT ENGAGEMENT OVER THE RACC HAS BEEN INADEQUATE.**

**Community Groups**

We note that the Scoping Report 5.3 names this association as a stakeholder who will require consultation throughout the preparation of the EIS. *(Our name is given wrongly, as Mosman Parks and Gardens. There is no community group of that name).* However, we are not mentioned by name in the response to the SEARS Outcomes Report Table 1 Appendix AA., even though community groups are listed as a SEARS item.

**Taronga Zoo members, visitors, and guests**

This group is listed in the Stakeholders in the Urbis outcomes report Appendix AA.

They were to be provided with written information and a website link and invited to a community information session with the engagement objective of providing balanced and objective information to assist in understanding the proposal's impacts and benefits.

I, personally, am a member of the Taronga Conservation Society Australia and I am also a Zoo Friend. I have trawled through the emails received from both and I cannot find an email relating to the proposed developments.

### **EIS - Can the consultation be relied upon?**

If these two groups (community groups and members, visitors, and guests) are missing from the engaged stakeholders, we have to ask whether there are others who were not engaged and whether the consultation as conducted was sufficient for the EIS to be relied upon.

### **The Reptile and Amphibian Conservation Centre (RACC)**

The justification for the RACC is the need for an animal hospital in the location of the current reptile centre. We cannot comment with authority on the need for a hospital, but it seems very likely given our environmental predicament of climate change, habitat loss and extinctions.

We cannot comment on the adequacy of the current reptile and amphibian housing, but we **can** say that the existing centre is very popular with children whose response is one of excitement and wonder. There is no reason why a new one wouldn't create the same response. Additionally, the zoo's conservation of reptiles and amphibians has been a primary and successful focus.

### **CONCERNS - Visual impact, particularly views from Sydney Harbour**

We appreciated our meeting with staff when the Habitat and Wildlife Retreat was being planned in 2016. It is possible that our concerns with the current development could have been answered by an on-site meeting.

### **Visual impact**

We attempted to assess the visual impacts of the development from the Sydney Harbour by examining Appendix E1 RACC Architectural Plans by Design Worldwide Partnerships (dwp). We acknowledge the sympathetic design, but we found it difficult to conclude from the photomontage that the development would not be visible from the Harbour.

We note

- In regard to SHREP 2005 the scoping report states that "It is not envisaged the proposal will result in any visual, scenic or environmental impacts on Sydney Harbour and its foreshore. **A visual impact assessment from the foreshore or harbour will not be required to support this SSDA.**"
- in the Scoping Report 5.2 "the overall design is **unlikely** to be visible from Sydney Harbour".
- And 6.2.3 Visual "It is the intention of the design to remain below the existing tree canopy and retain the majority of existing trees to reduce visual impacts from Sydney Harbour..... **the EIS will address potential view impacts but will not require a formal view impact assessment from the foreshore or 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”.

**Adequate consultation may have allayed our doubts about**

- **the assessment by the scoping report that there would not be a need for a visual impact assessment.**
- **And the actual visibility from the Harbour**

**Biodiversity**

We note

- The Scoping report: “Existing significant vegetation will largely be retained and integrated into the overall landscape design for the site and “The EIS will include a comprehensive arboricultural and biodiversity review of the existing vegetation and habitat on the site and identify all vegetation proposed for removal and retention as part of the proposal. An assessment of the site’s biodiversity values and likely impacts of the proposal will be undertaken to inform the EIS for the proposal.
- The EIS has undertaken “to ensure that the proposed built form allows for the retention of heritage and highly significant trees, a Landscape Concept Plan...”

This was of less concern to Mosman Parks & Bushland but a conversation about significant trees, and vegetation in general would have been helpful to our understanding.

**CONCLUSION**

The Mosman Parks & Bushland Association objects to the SSDA, not on the basis of the application for facilities that will assist the conservation work of the Taronga Conservation Society Australia, but on the lack of engagement with potentially interested and concerned stakeholders. Such lack of consultation makes the Environmental Impact Statement (EIS) a much less reliable document.

Kate Eccles OAM  
President  
25 August 2021