



# SUBMISSION TO FUN SEPP

Prepared for  
Taronga Conservation  
Society Australia

November 2021

This report is dated **November 2021** and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (Urbis) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of **Taronga Conservation Society Australia** (Instructing Party) for the purpose of a **Submission to the Fun SEPP** (Purpose) and not for any other purpose or use. Urbis expressly disclaims any liability to the Instructing Party who relies or purports to rely on this report for any purpose other than the Purpose and to any party other than the Instructing Party who relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events including wars, civil unrest, economic disruption, financial market disruption, business cycles, industrial disputes, labour difficulties, political action and changes of government or law, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or made in relation to or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

---

**Urbis acknowledges the important contribution that Aboriginal and Torres Strait Islander people make in creating a strong and vibrant Australian society.**

**We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.**

Urbis has made all reasonable inquiries that it believes is necessary in preparing this report but it cannot be certain that all information material to the preparation of this report has been provided to it as there may be information that is not publicly available at the time of its inquiry.

In preparing this report, Urbis may rely on or refer to documents in a language other than English which Urbis will procure the translation of into English. Urbis is not responsible for the accuracy or completeness of such translations and to the extent that the inaccurate or incomplete translation of any document results in any statement or opinion made in this report being inaccurate or incomplete, Urbis expressly disclaims any liability for that inaccuracy or incompleteness.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the belief on reasonable grounds that such statements and opinions are correct and not misleading bearing in mind the necessary limitations noted in the previous paragraphs. Further, no responsibility is accepted by Urbis or any of its officers or employees for any errors, including errors in data which is either supplied by the Instructing Party, supplied by a third party to Urbis, or which Urbis is required to estimate, or omissions howsoever arising in the preparation of this report, provided that this will not absolve Urbis from liability arising from an opinion expressed recklessly or in bad faith.

\_\_\_\_\_ responsible for this report were:

---

\_\_\_\_\_  
\_\_\_\_\_

---

\_\_\_\_\_

All Rights Reserved. No material may be reproduced without prior permission.

You must read the important disclaimer appearing within the body of this report.

# INTRODUCTION

We write on behalf of Taronga Conservation Society Australia (TCSA) in relation to the Explanation of the Intended Effect currently on exhibition.

TSCA thanks the Department of Planning, Industry and Environment (DPIE) for the opportunity to comment on a range of changes to the *existing State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (Codes SEPP)* which has been referred to as the 'Fun SEPP'.

Taronga Zoo is one of Australia's most popular attractions and an iconic destination. Together with the open range facilities of Taronga Western Plains Zoo it attracts more than **2 million visitors annually** and contributes an estimated \$249 million per annum to the NSW economy.

TSCA supports the changes to the Codes SEPP which aim to streamline event management across the State and will assist on the **Road to Recovery** for NSW.

Taronga Zoo is an iconic and significant landholding and fulfils a key role as one of the most significant tourist destinations in Sydney and NSW. TCSA therefore takes great interest in the Fun SEPP and any future implications for the Zoo.



# ABOUT TARONGA ZOO

Taronga Zoo holds many popular and successful community events, including Vivid Sydney, New Year's Eve celebrations and the Twilight Concert series. Taronga Zoo also offers rope climbing experiences and overnight experiences including the 'Roar and Snore' program and Wildlife Retreat at Taronga in Sydney and Zoofari Lodge, Savannah Cabins and Billabong Camp in Dubbo.



Taronga Zoo has a world class reputation for education, engagement and immersion of people with wildlife. A core function of TSCA is to increase understanding of conservation and change human behaviour to support the conservation and preservation of species. Events offered by Taronga Zoo create direct and positive connections between wildlife and people. They also provide an opportunity for visitors to learn first-hand about conservation and how revenue helps support conservation projects.



Taronga Zoo, Mosman and Taronga Western Plains Zoo, Dubbo also caters for a variety of functions, including weddings and corporate events with Function Centres located at both sites.



The breadth of events, educational experiences, accommodation and offerings illustrates the diversification of Taronga Zoo away from the historical status of a zoo as a place to simply go to observe animals.

# PROPOSED AMENDMENTS TO TEMPORARY EVENTS

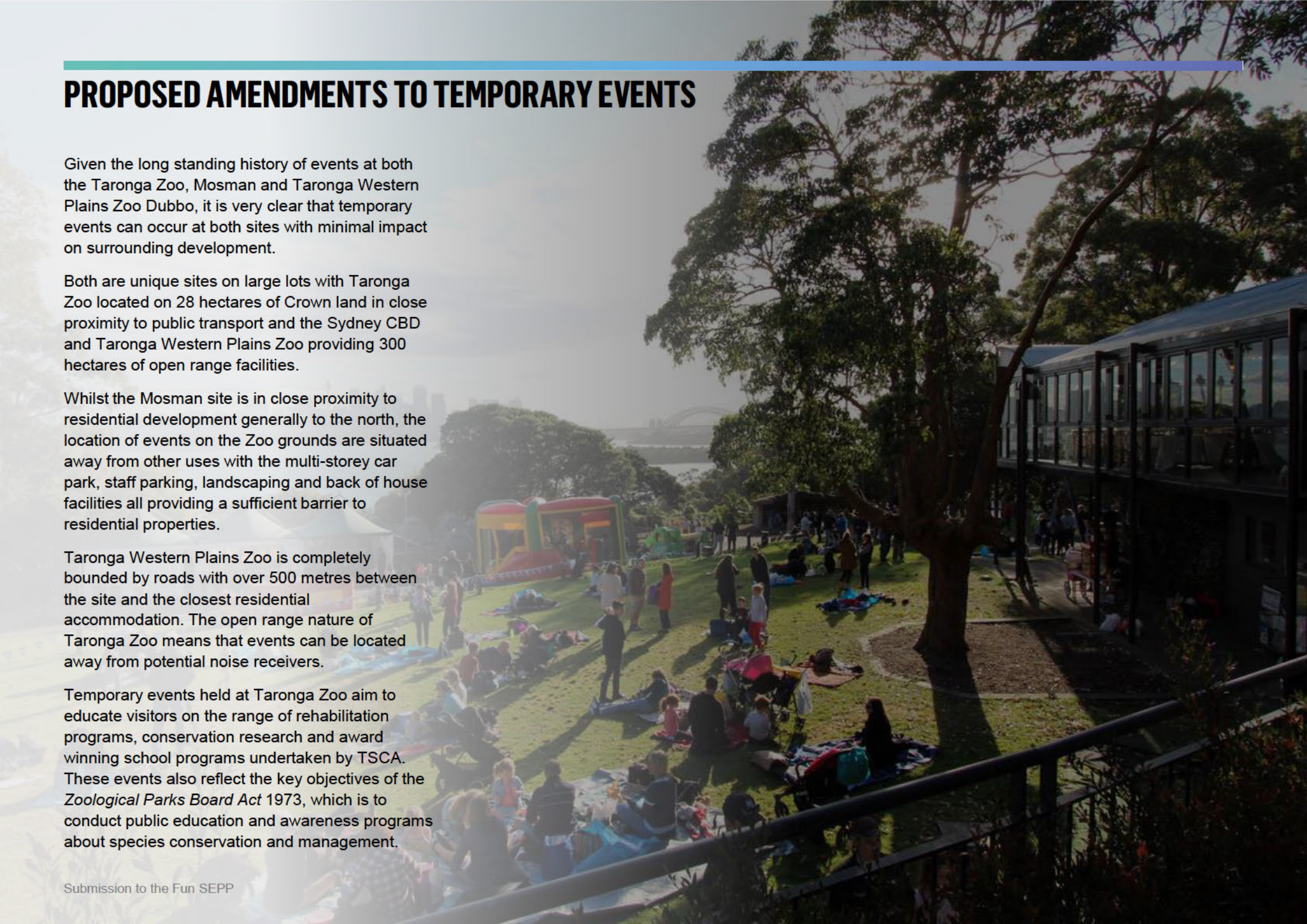
Given the long standing history of events at both the Taronga Zoo, Mosman and Taronga Western Plains Zoo Dubbo, it is very clear that temporary events can occur at both sites with minimal impact on surrounding development.

Both are unique sites on large lots with Taronga Zoo located on 28 hectares of Crown land in close proximity to public transport and the Sydney CBD and Taronga Western Plains Zoo providing 300 hectares of open range facilities.

Whilst the Mosman site is in close proximity to residential development generally to the north, the location of events on the Zoo grounds are situated away from other uses with the multi-storey car park, staff parking, landscaping and back of house facilities all providing a sufficient barrier to residential properties.

Taronga Western Plains Zoo is completely bounded by roads with over 500 metres between the site and the closest residential accommodation. The open range nature of Taronga Zoo means that events can be located away from potential noise receivers.

Temporary events held at Taronga Zoo aim to educate visitors on the range of rehabilitation programs, conservation research and award winning school programs undertaken by TSCA. These events also reflect the key objectives of the *Zoological Parks Board Act 1973*, which is to conduct public education and awareness programs about species conservation and management.



# PROPOSED AMENDMENTS TO TEMPORARY EVENTS

TSCA acknowledges that DPIE has proposed to split the provisions for temporary events into two categories - Council land and private land.

It is noted that the Taronga Zoo site does not fall into either category and as such does not benefit from the same exemptions as other public land.

Given the number of events held throughout the year at both Taronga Zoo and Taronga Western Plains Zoo, it is recommended that DPIE update the proposed provisions to incorporate land owned by other public authorities.

TSCA welcomes the introduction of the new exempt pathway for events on private land, however, we consider that the limitation on events to 2 days is overly restrictive and would not achieve the aim of the Fun SEPP to provide a simple, cheap and agile way to support events held by businesses. The draft Fun SEPP needs to provide much greater flexibility to support the tourism, arts and hospitality industries (which have been the hardest hit by the pandemic) get back on their feet.

TSCA recommends that this is extended to 52 days per calendar year, which would permit events most weekends and would align with the intent of Clause 2.8 of the *Standard Instrument—Principal Local Environmental Plan* for temporary events, but would instead facilitate these types of minimum impact events through a streamlined exempt development pathway.

However, a preferred option would be to introduce specific provisions for both the Taronga Zoo sites similar to Subdivision 11 of the Codes SEPP which provides specific provisions for additional temporary development and events at the Sydney Cricket Ground.

Mosman Municipal Council has acknowledged the unique nature of the Taronga Zoo site through the introduction of specific provisions for a range of activities to be undertaken as exempt development within the Taronga Zoo, Mosman site under Schedule 2 of the *Mosman Local Environmental Plan 2012 (MLEP 2102)*.

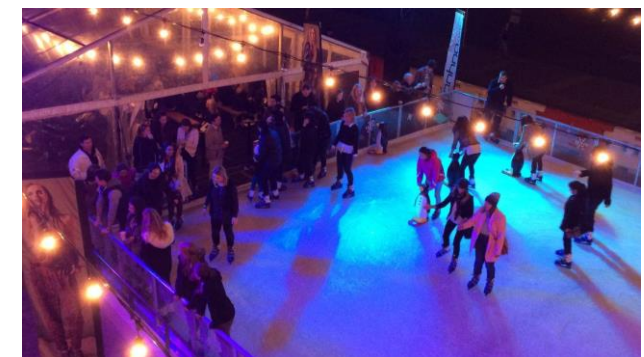
MLEP 2012 specifically states that the erection of temporary structures with a capital investment value (CIV) of less than \$1,000,000 is exempt development. The current provision does provide ambiguity as it does not specifically identify that uses associated with the structure are considered exempt development.

Dubbo Regional Council have also acknowledged that specific provisions are necessary for the Taronga Western Plains Zoo site and are considering updates to the current provisions as part of their current LEP strategic review.

We note that the EIE introduces a new clause for temporary events on public land which will combine temporary uses and temporary structures into one clause. TSCA is supportive of the change as it provides clarity around the use of temporary structures such as marquees and tents.

A recent example of a temporary structure within the Taronga Zoo site was the temporary ice rink which was installed for the July 2021 school holidays, but not used due to COVID.

The ice rink aimed to educate visitors on the Little Penguin, the world's smallest and Australia's only native penguin. Whilst skating, guests would be able to discover the wonder of the Little Penguin with bright and engaging messaging featuring on the inside of the Ice Rink's barrier.



# PROPOSED AMENDMENTS TO MAJOR EVENTS SITES — ADDITIONAL TEMPORARY DEVELOPMENT

One of the key changes proposed in the Fun SEPP EIE is the extension of temporary events for Major Sites identified in Subdivision 10 of the Codes SEPP.

Major Sites currently include:

- The Rocks;
- Darling Harbour;
- Barangaroo; and
- Sydney Olympic Park

Under the existing provisions, the number of consecutive days temporary events can be held without development approval is limited to 21 days, with no location to be used for more than 140 days (including set-up and clean-up) in any calendar year.

The Fun SEPP proposes to increase this to 60 consecutive days and no more than 200 days in any calendar year, allowing these sites to host a range of activities across the year. The proposed updates and also the new definition of a 'temporary event' is supported by TSCA.

Given the importance of the Taronga Zoo site as a major tourist destination for Sydney and NSW, **we recommend that Taronga Zoo, Mosman is introduced as an additional Major Site under the Codes SEPP** to allow flexibility across the site in providing future community events.

As noted previously, Taronga Zoo is a world class tourist destination and a key driver of tourism for both Sydney and NSW. It's strategic importance to the State is reflected in Taronga Zoo being identified as an SSD State Significant Development – Identified Site (SSD Identified Site) within *State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)*.

It is also noted that existing Major Sites including The Rocks, Darling Harbour and Barangaroo are all public precincts and Crown land. These precincts are also identified under Schedule 2 of the SRD SEPP with similar provisions as Taronga Zoo allowing for larger projects to be considered 'State Significant Development'.

Given the high profile community events already held by Taronga Zoo and its reputation as one of the most important tourist sites in NSW, the introduction of Taronga Zoo site as a Major Site is a logical step for the Codes SEPP.

## SSD Identified Sites within close proximity to the Sydney CBD



# SUMMARY OF RECOMMENDATIONS

We would like to thank you again for the opportunity to provide a submission to the EIE for the Fun SEPP and associated changes to the *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (Codes SEPP)*.

Given the importance of the Taronga Zoo site from a tourism perspective and to continue to provide world-class conservation and education facilities, we offer the following recommendations:

- **Update the new exempt development pathway for events on private land to permit events for 52 days per calendar year;**
- **Introduce specific exempt provisions for events on Crown Land or specific exempt provisions for temporary events at Taronga Zoo, Mosman and Taronga Western Plains Zoo, Dubbo; and**
- **Include Taronga Zoo, Mosman as a 'Major Site' within Subdivision 10 of the Codes SEPP.**

We would be happy to meet with DPIE to discuss opportunities for Taronga Zoo to assist with the Road to Recovery and continue to support a range of vibrant, diverse, inclusive, and safe events for the community to enjoy.

If you would like to discuss further, please contact any of the following:

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]



