

2 October 2019

Mr Brad James
Senior Planning Officer
Independent Planning Commission NSW

Copy to:

Suellen Fitzgerald
Executive Director
Western Sydney Parklands Trust

Dear Mr James

**Re: SSD 7228 Sydney Zoo
Modification 3**

Calmsley Hill City Farm is a 'working' farm that has been showcasing agricultural production to education and the leisure and tourism industries since 1984. We are located 8.2km south of the proposed Sydney Zoo at Bungarribee. We host approximately 130,000 visitors a year and employ 48 people. We have regular visitors from disability and social welfare groups and host school and tertiary work experience placements. The Farm works with the RSPCA and working dog rescue organisations to rehome and foster animals. More recently we are working with agricultural industry groups, assisting them address the city – country divide and counter mis-information about agriculture.

We have recently become aware that Sydney Zoo has lodged 'Modification 3' to increase the opening hours for the new zoo.

We make this late submission objecting to Modification 3. In summary, Modification 3 should be refused because:

- it is not in the public interest to extend operating hours and increase public access to the Zoo before Sydney Zoo has complied with its obligations in relation to the Development of Regional Tourism required by Condition C9. The Zoo has not made any attempts at all to consult with us on enhancement of regional tourism. Instead, the Zoo has actively taken steps to replicate our farm experience and poach our staff; and
- Modification 3 will have social and economic impacts in the locality because the increased opening hours will allow Sydney Zoo to target more international tourists – who are interested in native animal and Australiana farmyard animal experiences (which are the same experiences offered by us). Our review of documentation on the IPC Website hasn't found any assessment of that impact in relation to our business and flow on impacts in the locality.

Since the Zoo was announced in 2015, we have been concerned about the affect it will have on our business. When we reviewed their development applications and consents it appeared to be a facility for native and exotic animals only, not farm animals. Our first contact with the Zoo was 4 weeks ago when an ex-employee, who left us to take up a position with the Zoo, contacted us to buy farm animals - we were shocked to find out the Zoo intends to have a Farm Experience exhibit.

We contacted the Zoo and requested that they not keep or exhibit farm animals for a number of reasons but most particularly because it erodes the differentiation of our businesses and offerings. The Zoo declined our request.

For the last four weeks we have been reviewing the documentation on the NSW Planning and Independent Planning Commissions Portals. In that documentation we only see applications for and approval of native and exotic animals so we question if they have consent for keeping and exhibiting farm animals. We have requested the Department of Planning, Industry and Environment to urgently clarify this.

Reviewing the portal documentation for the Zoo we also found:

- Consent Condition C9:

Development of Regional Tourism

- C9. Prior to the commencement of operations, the Applicant shall submit a report to the satisfaction of the Planning Secretary demonstrating it has made genuine and reasonable attempts to consult with local recreational facilities and businesses (including Featherdale Wildlife Park) to enhance regional tourism in conjunction with the Development. The report shall include:
- (a) details of how the operation of the Development will differ from the existing recreational facilities and businesses;
 - (b) detail consultation undertaken with local recreational facilities and businesses;
 - (c) outline initiatives implemented to encourage and enhance continued operation in conjunction with local recreational facilities and businesses;
 - (d) detail the success or otherwise of these initiatives using recognised social indicators; and
 - (e) include detail of the additional activities that will be undertaken for the duration of the Development.

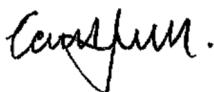
The Planning Secretary may request updates on these initiatives at any time.

- In their Environmental Impact Statement our business is listed second after Featherdale in the list of attractions in *Section 2.5.1 Nearby Tourism & Recreational Attractions*. Presumably they see us as the second most relevant nearby tourism and recreational attraction after Featherdale or perhaps it is proximity, we are the second closest to them.

We note, other than our recent contact with the Zoo regarding farm animals and our request that they not keep them, we have had no contact from the Zoo. **The Zoo has not made any attempts at all to consult with us on enhancement of regional tourism. Instead, the Zoo has actively taken steps replicate our farm experience and poach our staff.** As the Zoo has not made any genuine and reasonable attempts to consult with us we can only assume the report required by Consent Condition C9 has not been submitted, or if it has that the Secretary has not approved it? We have asked the Department to urgently clarify this.

We request the IPC to consider this submission when determining Modification 3.

Yours Sincerely
City Farm Pty Ltd



Carl Small
Director