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Our ref: DOC24/777579-4

Department of Planning, Housing and Industry
GPO Box 39
SYDNEY NSW 2001

By email: anna.nowland@dpie.nsw.gov.au

Dear Anna Nowland

EPA Advice on Environmental Impact Statement

I am writing in response to your request for the NSW Environment Protection Authority (**EPA**) to review the Environmental Impact Statement (**EIS**) for the proposed Taronga Zoo Sky Safari upgrade (Application SSD-46807958) at Lot 22 in DP 843294, Taronga Zoo, Bradleys Head Road, Mosman NSW 2088 (**premises**).

The EPA has reviewed the *Taronga Zoo Sky Safari, Environmental impact Statement SSD-46807958 (version 1) – Urbis – September 2024* and appended documents T, V, W, and X.

From our review of these documents, we understand the proposal to involve:

- The installation of a new 916m Sky Safari cable car system which will replace infrastructure along an existing cable car route.
- Site preparation, demolition, excavation, construction, and landscaping works, including of stations to be located at the upper and lower entrances of the premises.
- The ongoing operation of the Sky Safari cable car system once installed.

Taronga Conservation Society Australia (**proponent**) currently holds Environment Protection Licence number 1677 (**Licence**) permitting the scheduled activity of sewage treatment at the premises. The current proposal relates to the premises at which the Licence applies. Any commitments made in the final EIS may be formalised and placed as conditions on the Licence.

The EPA has reviewed the EIS and notes that it does not provide the information required to allow us to complete our assessment. From speaking with the proponent, we also understand that the proposal may be subject to change and that the contract has yet to be awarded.

Based on the above, the EPA has the following comments and recommendations:

1. Matters to be addressed prior to determination

a. Noise & Vibration

Comment: For operational mechanical noise, Section 7.2 of Appendix T – Noise and Vibration Impact Assessment notes that ‘final plant selections and locations have not been made; therefore a detailed assessment has not been carried out.’ Without a specific understanding of the mechanical plant and its location, the impacts that the proposal may have on nearby sensitive receivers cannot be accurately understood, nor can a judgement on whether the proponent will be able to appropriately manage any potential impacts be made.

Recommendation: *The EPA recommends that the proponent be required to predict noise impacts in line with Section 3.3 of the Noise Policy for Industry (NPfI), which would include all noise sources related to the proposed development, with source noise levels, source locations, and effective height of the noise sources. In addition to this, the proponent should also*

quantitatively consider whether any receivers along Raglan St, Mosman or Cremorne Rd, Cremorne Point would be impacted by the proposal.

Comment: Similar to operational mechanical noise, Section 9.1 of Appendix T – Noise and Vibration Impact Assessment notes that the assessed works phases are indicative only, with the selected contractor to be responsible for providing further detail about the works stages, timing, and plant once the contract has been awarded. In lieu of a detailed understanding of construction methodology, Appendix T – Noise and Vibration Impact Assessment has assessed indicative scenarios and provided general mitigation measures. As such, there is a risk that construction works could significantly impact nearby sensitive receivers, especially if high noise impact activities occur for an extended duration or during sensitive periods (e.g. evening or night).

Recommendation: *The EPA recommends that the Department of Planning, Housing and Infrastructure carefully consider the extent of construction noise impacts (including magnitude, duration, and timing) and the appropriateness and specificity of mitigation proposed to manage impacts when making its determination. The EPA also recommends that the proponent quantitatively consider construction impacts at receivers along Raglan St, Mosman and Cremorne Rd, Cremorne Point.*

b. Surface & Wastewater Management

Comment: The EPA notes that Appendix V – Water Management Plan referred to an Appendix D. We had been unable to view Appendix D, and as such, it could not contribute to our review.

Recommendation: *Based on current understanding, the EPA recommends the proponent be required to:*

- i. Assess potential impacts on soil resources and receiving waters at or near locations of demolition, construction and/or excavation, including impacts on soil erosion, salinity and any acid sulfate soils. Control measures will need to account for the identified impacts and the proximity of works to any receiving waterway (Sydney Harbour). Enhanced measures to protect Sydney Harbour from water quality impacts may be required and could include upslope clean water diversion and windrows/berms to reduce slope length (in vulnerable areas such as the bottom station), in-water devices and regular audits and monitoring of measures with the frequency based on risk.*
- ii. Explain the compatibility of the existing Wastewater Treatment Plant (WWTP) to process surface water runoff with predicted/potential sediment compositions from demolition, excavation, and construction areas.*
- iii. Explain how potential increases to the amounts of surface water runoff being collected (ie with the use of sprays for dust suppression) and processed by the WWTP will be managed.*
- iv. Prepare or update a WWTP operation and maintenance management plan for the proposal to ensure that the WWTP has maximum available treatment capacity during all demolition, excavation and construction activities, and that all treatment processes are fully operational during these times. In addition, ensure all other WWTP management plans are updated to account for the potential variation in influent as a result of the proposal.*

2. Matters to be addressed with conditions

c. Land and soil contaminants

Comment: Appendix W - Contamination Report notes the possibility of asbestos and lead based paints in current buildings and a risk that asbestos may be present within the near surface soil and in fill across other untested parts of the premises. Appendix W - Contamination Report also states that the footprints of the existing buildings within the proposed station sites present a data gap as the areas had been inaccessible at the time of investigation.

Recommendations: *The EPA recommends that the Department of Planning, Housing and Infrastructure uphold the recommendations of Appendix W - Contamination Report, notably that the proponent should be required to undertake:*

- i. *A post demolition site walkover to visually check for any suspected hazardous buildings materials within any building demolition footprints and nearby surfaces by a qualified occupational hygienist or suitably qualified environmental consultant. This should be conducted prior to any earthworks to minimise the risk of cross-contamination between building demolition waste and subsurface soils;*
- ii. *A data gap assessment including additional intrusive investigations within existing building footprints after the demolition and surface clearance has been completed;*
- iii. *Additional visual and analytical assessment of soil prior to off-site disposal to confirm the preliminary in situ waste classification assessment provided; and*
- iv. *Preparation of an Unexpected Finds Protocol outlining the procedures that would be undertaken in the event unexpected contamination is encountered during excavation works.*

The EPA also recommends that where any changes are made to the location of the proposal, the Department of Planning, Housing and Infrastructure consider requiring additional exploratory works to determine potential contaminants and their extents and pathways within the new areas.

3. Minor matters

d. Waste Management

Comment: The EPA understands that Appendix X - Operational Waste Management Plan primarily relates to the methodology for waste management of the Sky Safari post construction.

Recommendations: *As such, the EPA recommends further information about waste management during the site preparation, decommissioning, excavation and construction phases of the proposal be required, including to:*

- i. *Assess and describe all aspects of waste generation, management and disposal associated with the proposed development.*
- ii. *Demonstrate compliance with all regulatory requirements outlined in the Protection of the Environment Operations Act 1997 and associated waste regulations.*
- iii. *Outline contingency plans for any event that may result in environmental harm, such as excessive stockpiling of material, dust, or dirty water volumes exceeding the storage capacity available on-site.*
- iv. *Show proposed locations of any waste storage at the premises during the site preparation, decommissioning, excavation or construction phases, and a description of the controls to be applied during non-operational timeframes when proponent or contractor personnel may not be present.*

e. Dust Controls

Recommendation: *The EPA recommends that further information about dust suppression and planned controls during the site preparation, demolition, excavation and construction phases of the proposal be formalised in documentation or a management plan comprising the EIS. This should include information about the circumstances, triggers, and frequency for the use of each control, justify the adequacy of the controls considered, and identify the roles and responsibilities of operating personnel.*

If you have any further questions about this matter, please contact Claudia Gilchrist, Operations Officer, on 02 9274 6251 or at claudia.gilchrist@epa.nsw.gov.au.

Yours sincerely



8 November 2024

Erin Barker
Manager Regional Operations