

# HPG RESPONSE TO TARONGA ZOO SKY SAFARI ENVIRONMENTAL IMPACT STATEMENT SSD-46807958



ABOVE: an approximation showing the pylon and cableway clearly above the tree line.

Headland Preservation Group

17 October 2024



## Submission Taronga Zoo Sky Safari Environmental Impact Statement SSD-46807958

The Headland Preservation Group (HPG) appreciates the opportunity to comment on the Environment Impact Statement as it relates to the current plan to revitalise the Taronga Zoo Sky Safari. In context we cite and support the Vision of Taronga Zoo to 'secure a shared future for wildlife and people.'

HPG acknowledges the need for the Zoo to continuously upgrade its facilities for both animals and visitors and appreciates the key stakeholder engagement you have sought throughout each phase of the design process.

## Introduction

This project concerns a national asset situated on the foreshores of spectacular Sydney Harbour, which attracts local, domestic, and international visitors and is important to NSW tourism. However, protection of the irreplaceable natural values of its location on Bradleys Head and recognition of the impact of such a project on the local residential community are also important considerations.

HPG submitted its concerns regarding the Revitalisation of Taronga Zoo Sky Safari in November 2022. We appreciate the NSW Department of Planning's response to community and employee comments and note that the original route of the Sky Safari is to be maintained, although with a larger footprint, and the number of pylons within the Zoo reduced from 9 to 6.

However, there are some major changes that are of concern and will have a significant impact on the local community. HPG now wishes to make further comment on the EIS for the Taronga Zoo Sky Safari upgrade, particularly in relation to:

- → The timing allowed for submissions, affecting Council and Community Engagement
- → Visual impact and tree canopy
- → Traffic generation and parking capacity
- → Construction impacts

## **Time Period for Submissions**

The **allocated time** of one month for submissions is inadequate for meaningful community engagement.

→ The time allocated includes two weeks of State school holidays when many families are on vacation and/or absent from their regular abode and concerned with other matters.



The Environmental Impact Statement and supporting Appendices to be reviewed are complex and lengthy, and the exhibition has only been made available through the portal. To expect members of the public to read such a huge amount of material online, reflect and make a meaningful submission in such a short period of time is unrealistic.

At the meeting of the Environmental Community Group and the representatives of Taronga Zoo's Sky Proposal on 24 May 2024, the community requested that "if the exhibition period falls in the school holidays, the exhibition time must be extended to cover that 'overlap.'" This request has been ignored.

→ The allocated period commenced before the outcome of the local government elections was finalised and before the Mosman Council was sworn in.

Mosman has a new mayor, Councillor Ann Marie Kimber, and another new councillor. It is imperative that the Council consider the impact that this project will have on the local Community, particularly its effect on traffic and parking management in Mosman, especially in zoo surrounds. Council must be given the time to meet formally to consider and resolve upon the EIS before the closing date for submission. Council members represent and reflect the views of the local Community, and the Taronga Zoo Planning Committee must work with the local Council.

We request that an extension of time of one month be given for such a nationally significant project.

## Visual Impact Assessment

#### Sky Safari Pylon and Cable Car Height

Because of the steepness of the topography, the revitalised Sky Safari, both cableway and pylons, will be more visible from within the Zoo, immediate surroundings and public and private locations within the Sydney Harbour and its foreshore.

In viewpoints 5,6,7 in the Assessments of Impact, the *"cableway does exceed tree height and interrupt canopy coverage"*. It will be visible from various public locations and the Taronga Function Centre (EIS p72-76).

Currently, much of the urbanisation of Taronga and the "Zoo Headland" is largely hidden from the harbour by vegetation, In the Revitalised Sky Safari, the pylon and cableway height, especially Pylons P2 to P5 (EIS p86) are *"above the prevailing tree canopy line"* (EIS 87p). P5 will be 36.5 metres high, which is equivalent to the height of a 10-story building. It will be highly exposed from all directions. Is it possible, considering structural and operational concerns, to reduce the height of these pylons, especially P5?



#### Impact of proposed Lower Station

The proposed Lower Station (Viewpoints 18,19,20,22,23) will result in a change to the Zoo's visual setting from various locations around the harbour, making it more intrusive. It does not "blend in" with the natural environment. (EIS p87)

The proposed location of the planned new entrance to the lower station will remove the current intrusive 30 steps to the entrance of the cable car. An arrival plaza, the integration of core amenities, a lift and seating for guests is commendable. However, local endemic vegetation will be removed to allow this walkway in the proposed location.

It is hoped that the location of the ramp at the back of the station will be less noticeable from the Athol Wharf and Bradleys Head Road than the current steps. The opening of the bottom entrance of the Zoo to receive guests will hopefully help reduce waiting queues. However, we suspect that only a minority of visitors will choose to enter there as it involves walking up the relatively steep incline inside the Zoo rather than being driven to the top entrance. Entering the Zoo from the top entrance allows them to walk down the hill through the Zoo and this is far preferable to visitors than the alternative.

#### **Removal of Trees**

As the planned revitalisation will involve larger gondolas, it is regrettable that this also means the width of the revitalised Sky Safari must be increased, requiring the removal of 65 high value trees and 209 moderate value trees (EIS p91). HPG requests that all possible measures be undertaken to reduce the felling of mature and valued trees.

However, it is encouraging that by retaining the existing route of the Sky Safari the number of trees requiring removal has been reduced. Regular monitoring must occur to ensure that the protocol for each separately identified tree is being followed to protect these trees during the construction process. HPG is pleased to note that mature plantings of replacement trees have been incorporated into the overall design and that the heritage Araucaria Cunninghamii are to be preserved.

Notwithstanding the above, the Sky Safari, being of such width and height, will be a huge scar on the site visible from many sections of the harbour for years even after existing vegetation has recovered from construction and supplementary plantings have matured. Pylons 2-5 will still be permanently above the tree canopy.

## **Traffic generation**

Objective 15 of the Greater Sydney Region Plan – A Metropolis of Three Cities revitalising the Sky Safari states: the project will "bolster the financial and commercial sustainability of the organisation (EIS p28) and Objective 18: "it will increase Sky Safari's former capacity (EIS p 28)



This justification of the plan is based on the expectation that the revitalisation will increase the number of visitors to the Zoo. It is noted that this will also correspond with an upgrade of the Taronga Zoo Wharf, supposedly encouraging guests off roads and onto public transport. The report asserts that "the reinstatement of the Sky Safari will promote a modal shift away from private vehicle towards public transport" (EIS p94), assuming the Sky Safari will result in a 5% shift to public transport.

However, there is no strong evidence for this assertion (p19 Appendix R-Transport and Accessibility). This assertion of reduced vehicular traffic is repeated on Page 22 (Appendix R). We suggest that this will not be the case. On the contrary, the community is concerned that it may generate extra traffic generation through Mosman and extra parking. It is noted that the traffic behaviour survey conducted by JMT Consulting was undertaken "on a typical weekend in July 2023." (EIS p93). This was winter when visitation to the Zoo is reduced.

Many visitors to the Zoo do not come by public transport, as it is inconvenient to do so from many northern, western, and southern suburbs. As local residents, we note that many Zoo visitors arrive by car.

In the warmer months, especially on weekends, public holidays, and school holidays, the large number of visitors to the Zoo creates traffic chaos and delays in the main thoroughfare of Mosman and neighbouring Cremorne, and local suburban streets also become a parking lot.

Based on a simplistic analysis of only one intersection, Whiting Beach Road and Bradleys Head Road, the report claims that Bradleys Head Road "has and will continue to have spare capacity to accommodate traffic movements associated with the proposed upgrade to the Sky Safari. The volume of traffic on Bradleys Head Road is below the typical capacity of an urban road of approximately 750 vehicles per hour per lane". (EIS p93) In short, the assertion is that the upgrade will have no negative impact on network traffic.

Yet residents surrounding the Zoo and nearby Clifton Gardens have difficulty leaving and accessing their homes due to traffic chaos generated by the Zoo. Bus/ferry connections are disrupted due to buses being unable to navigate the traffic jams to connect with the Taronga Zoo ferry service. As a result, local commuters are often unable to access the city via the ferry service at weekends.

The Sky Safari may itself become a main tourist attraction, increasing the number of visitors and days of peak visitation.

## **Parking Capacity**

With the anticipation of more guests visiting the Zoo, traffic and parking is a major issue. The traffic management suggestion to have additional staff hand out "tickets on approach to the car park precinct" (page 23 Appendix R) is ridiculous and doesn't solve the problem. Far quicker to have number plates read on entry and payment on exit.

"**Better Placed** is an integrated design policy for the built environment developed by the NSW Government Architect. The policy aims to enhance the quality of life for the people of New South Wales by promoting good design in the planning, design, and construction of buildings, spaces, landscapes, and neighbourhoods." (EIS p29).



Unless traffic management is adequately addressed, the proposed plan will seriously impact the quality of life of the local community. Mosman Council and the Taronga Zoo Planning Committee must reconsider this issue.

## **Construction Impacts**

→ The report asserts that most visitors arrive by ferry. Yet bus and ferry operations will be impacted during construction. The Construction Pedestrian Traffic Management Plan (CTPMP) to use the bus turning circle of Athol Wharf Road as a work zone will certainly impede the operation of the existing transport services, both public (ferry and bus) and private vehicles.

The plan to terminate the 238 bus at the upper station is unacceptable. Many local people rely on this service to access Taronga ferry transport. To suggest that all commuters transfer to a minibus service at the upper station and continue to do so for two years is unreasonable. It is a huge imposition on local residents and will add considerable extra time to their journey. A fleet of mini buses will be required to transport a ferry-load of people to the top entrance and mini buses will have to meet every ferry.

The aim to encourage "more people to use the 100 bus service to reduce demand on the 238 service in future" (29 Appendix R) is no solution. These bus services have completely different routes – the 238 runs from Balmoral to Athol Wharf, and the 100 from Taronga Zoo to QVB Building in the city. They do not overlap except for a very short 1 kilometre between Mosman Junction on the top station of the Zoo. It is unconscionable to use a public road, disrupting both public and private transport arrangements, for a construction work area for two years.

Has the National Parks been approached about the possibility of using their parking area above Athol Hall off Bradleys Head Road for storing construction materials rather than lower Athol Wharf Road? Materials could be transported down the 0.5 kilometre road when needed, thereby not impacting ferry and bus services. Also, construction materials could arrive by barge for the lower station rather than by road.

- → As yet, there is no detailed published plan for construction vehicles delivering and removing construction materials through the local road network. Military Road is already overloaded with local traffic. The assertion that 20-30 construction trucks daily on Bradleys Head Road for two years will not have an adverse impact on the residential amenity is unfounded. Prince Albert Street residents report that trucks currently use this road as well.
- → The assertion that construction workers will use public transport rather than private vehicles, thereby creating no need for extra parking, is unfounded (p29 Appendix R). Most workers prefer their private vehicle to allow flexibility and facilitate the transport of tools and equipment.



→ During the construction of the proposed pathway for visitors waiting to use the Sky Safari, it is feared that parking for local commuters will be affected and possibly reduced.

The estimated construction phase of the Proposal is 24 months. The Proposal will obviously generate noise during its construction and operation.

Therefore, it is imperative that the construction-related impacts of the works be thoroughly addressed and explained to the local community by Taronga Zoo Planners and Mosman Council if they agree to these arrangements.

HPG, as a significant local stakeholder, appreciates the opportunity to give feedback on Taronga Zoo Sky Safari, Environmental Impact Statement SSD-46807958.

#### *Jill L'Estrange* President Headland Preservation Group

*Julie Goodsir* Vice President Headland Preservation Group