## Sky Safari EIS – Submission from Rosemary Adams 19 October 2024 Objects to the proposal

I have prepared the submission below to the Taronga Zoo's Sky Safari EIS . I have prepared detailed comments as well as a summary/ conclusion at the end.

I am a concerned and interested Mosman resident who participates in and makes a conscious effort to understand what is proposed for my local area and understand the impacts of proposed development. I am also the Secretary of the Mosman Parks and Bushland Association. In this latter capacity I have attended meetings, at the zoo offices, to discuss the Sky Safari project.

My submission below addresses the following aspects of the proposal Visual Impact Aboriculture Landscape and biodiversity Construction Management Traffic and Transport Community Engagement. Sky safari operations

#### A. Visual Impact Need to protect views from the harbour

As a site on Sydney Harbour, the visual Impact of the proposal is an important consideration which is at the heart of any consideration of environmental impact. Any development on the zoo site must have regard to its impact on views from the water. This is because the harbour is an area of National /International significance.

#### The stanchions- they are too high

The proposal to construct the sky safari where stanchions 3, 4 and 5 are at a height equivalent to a 10storey building is unacceptable. These stanchions, especially stanchion 5 will be clearly visible from points all over the harbour itself and from sites on the northern and southern sides of the harbour.

It is puzzling why they are so high when the retired sky safari had a much "flatter" structure. This difference is clearly shown on page 34 of the Design appendix.

While the gondolas are larger than those in the retired sky safari, the increased height of the sky safari appears to be an unnecessary overreach with significant adverse impact on views. Landscaping will never protect and screen these stanchions. The argument below that the visual impact can be reversed over time cannot be supported at all.

Figure 50 Viewpoint 19 and Figure 54 Viewpoint 21 in the Visual Impact appendix clearly show the significant and adverse impact of the proposed cableway and its overly high stanchions on views from the harbour. These are just 2 viewpoints, what of the rest of the harbour. It is not as stated a moderate change over a restricted area that is ongoing but capable of being reversed"

The height of these stanchions must be reviewed and reduced to protect the Nationally significant harbour.

Looking at the diagram on page 41 of the design appendix it appears that the height of the stanchion no 5 could be reduced with careful expert supervised pruning of the hoop pine.

# Unless stanchion height is reduced the visual impact of the sky safari as proposed will have an adverse and significant impact on views from Sydney Harbour.

#### The lower station -a strong visual element on the harbour

The lower station located right at the harbour side will have an additional visual impact. This impact would be mitigated if the existing large tree (listed as 468) could be retained. It is recommended for removal because it is next to the construction work site. This would be a severe loss for which replanted trees will not compensate until years later, and every attempt should be made to save it.

#### The gondolas – large and must be as unobtrusive as possible

The gondolas are larger than the ones in the retired sky safari. They are designed to accommodate strollers and wheelchairs. At any one time there may be many gondolas travelling along the cable . They will be easily seen given the height of the proposed cable and stanchions . This is not a moderate visual impact. It is essential that there is no advertising on the side of these gondolas. This would increase the gondolas' visual intrusiveness and should not be permitted.

# There must be a condition of consent that prohibits advertising of any kind on the gondolas.

#### B. Aboriculture - protect tree cover

A site on Sydney Harbour such as the zoo must protect its tree cover. The views to the zoo from the harbour are in part protected if vegetation is retained. As stated above these views are of National significance.

Appendix N, the arboricultural impact assessment report identifies four high category trees and three low category trees that will be lost because of this proposal.

The report also indicates that the proposal may adversely affect a further seventy-nine high category trees and nine low category trees if appropriate protective measures are not taken.

The aboriculture report sets out the protocols to follow to ensure the trees are protected. The 2:1 replanting program is very important to help the Skyway blend into its site.

# The continued oversight of an Arboriculturist in this process is essential and must be included as a condition of any consent.

If the sky safari is to proceed there must be a clear undertaking and a condition of consent that includes all of the protocols (arboricultural method statements) for each separately identified tree so that the trees are protected during the construction process and can thrive after construction. Regular monitoring of these trees must be undertaken and reported on regularly throughout the construction of the stanchions.

An agreement between the developer and its construction companies (HC and CCC) about protections and monitoring must be reached before work begins. This agreement and the protocols need to be readily accessible to all involved in construction to ensure every worker on site knows and follows these protocols.

It is noted that in Appendix N(p 9), tree 553 is referred to as an important tree. It is later described as a low category tree. This must be clarified so that the correct and appropriate protection measures are provided to tree 553.

#### C. Landscape and biodiversity

Landscape and biodiversity are linked and are extremely important on this harbourside location

The principles and requirements for landscaping described in Appendix O are:

- 👃 Landscape plantings are endemic to the area
- Provide shade for amenity and to reduce eat island effect
- Low water use plants
- 4 Adhere to tree management plan (see above under aboriculture)
- Maintain the urban canopy.

These are all supported

The low arrival station is set right on the water and has a potentially high visual impact. Landscaping as proposed to harmonise with the surrounding bushland, Sydney Coastal sandstone forest, will provide some relief.

At the upper station where many people will congregate the *angophora costata* and *banksias* will provide shade and mitigate any heat island impact

In relation to biodiversity it is recommended **that a project ecologist be assigned to supervise any vegetation clearing and to replace logs and branches.** 

#### D. Construction management

This area of the EIS suffers because a head contractor (HC) and a Cable Car Contractor (CCC) have not been appointed. Throughout the document many items have the words "cannot be confirmed until a head contactor and cable car contractor are awarded" This is problematic.

*The work site at the end of Athol Wharf Rd should be reviewed*. Its adverse impact on traffic, and the movement of residents and zoo visitors around the wharf and to the zoo and the general area is profound. This is discussed further under Section E Transport and Traffic below. The EIS says all work is within the zoo grounds and yet the end of Athol Wharf Rd (a public Rd) is shown as a work site for the lower station. **This must be reconsidered**.

# While so much is unknown there are a number of principles that should apply to the work that a construction contractor undertakes in this project. These must be included in any determination of the Sky Safari proposal. These principles are as follows;

- Protect the amenity and safety of the community and zoo visitors at all times
- Working hours for construction (not at night, Saturday afternoon or Sunday)
- Noise including machinery used- no hydraulic pick excavation
- Provide clear information and project updates throughout the project (discussed under engagement below)
- Traffic routes and vehicles (discussed under transport and traffic) Haulage of materials and spoil must follow designated roads (eg Bradleys Head Rd-Military Rd only).
- Provide effective waste management processes
- Protect all trees and vegetation except those approved to be removed. The advice contained in the arboriculture appendix must be implemented and understood by all on site. See the comments about aboriculture and landscape and biodiversity above.

Provide a comprehensive erosion and sediment control regime throughout the entire project. This is particularly the case for work at the lower station as this site is right on the harbour. Regular maintenance of erosion and sediment controls must be undertaken to ensure their effectiveness for the life of the construction project.

## E. Traffic and Transport

As a local resident I am concerned about the traffic and transport impacts of the proposed sky safari project. Some of the assumptions and assertions in this appendix do not reflect the lived experience of the local community. My comments concerning a number of issues are outlined below

#### Traffic

1. Traffic generation

The consultant asserts, without any supporting evidence, that the Sky Safari (SS) will improve traffic conditions (pages 19, 22, 31).

This assertion is based on their assumption that the SS will result in a 5% shift towards public transport, and the assumption that the total number of visitors to Taronga Zoo (TZ) will remain unchanged, and therefore the number of visitors' cars will drop.

#### However, there is no evidence to support these assumptions.

A more likely assumption is that the usage of cars to visit TZ at weekends and peak periods in school holidays is heavily influenced by the perceived availability of parking spaces. This will remain unchanged, and therefore it is probable that the number of cars attracted to TZ will remain unchanged.

The SS may well improve connections to public transport, and may well increase the proportion of visitors using public transport, but this is likely to be a result of SS increasing the total number of visitors to TZ, and not as a result of car traffic reducing.

# 2. Traffic Impacts

Based on analysis of only one intersection (page 22), the consultant concludes that the SS will have no impact on network traffic. This is simplistic and renders this report inadequate. It assumes that the SS will result in less traffic (see above), and it ignores the current levels of traffic congestion caused by TZ during periods of peak visitation.

Currently, at weekends and other peak periods, TZ traffic causes traffic congestion and delays to buses along the full length of Military Rd between Cowles Rd and Bradleys Head Rd. Residents in Clifton Gardens are often trapped at home or unable to return home because the local traffic conditions prevent them from accessing their own homes.

The SS may become a visitor attraction in its own right, increasing the number of visitors to TZ and extending the number of days in the year when 'peak parking' occurs and congestion occurs along Military Rd.

The impact of this scenario has not been assessed.

# 3. Traffic Routes

The consultants indicate that traffic, associated with the proposed construction of sky safari will travel along Military Rd and Bradleys Head Rd. The experience of residents living in the streets near the zoo does not support this statement. The lived experience of residents in Prince

Albert St is that construction vehicles associated with other building projects at the zoo often use Prince Albert St. They have been known to arrive as early as 3am -5am.

#### 4. Construction Trucks

The assessment of truck traffic (page 27) makes no mention of trucks removing spoil from the site. However, these "truck and trailer" vehicles are usually the most controversial impacts of construction projects due to their noise, dust and potential danger to pedestrians.

Also, there is no mention of any oversized trucks delivering long components of steel to the site. To avoid impacts on residents of Bradleys Head Rd, such deliveries must be restricted to normal daytime working hours.

To say that the number of construction trucks is only 1% of the traffic volume on Bradleys Head Rd is misleading (page 29). Given that all trucks have an adverse impact on the residential amenity of Bradleys Head Rd and on the retail/pedestrian amenity of Military Rd, the forecast number of trucks should be compared with the current (low) number of trucks on these roads, not with the total number of predominantly light vehicles.

#### Transport

The comments that I make below about the proposed transport arrangements described in the EIS are based on my own experience as I use the zoo ferry and 238 service very often. The proposal to use the turning circle at Athol Wharf Rd is at the heart of the problems described below. This must be reviewed.

1. Bus Services 238 and the work area at Athol Wharf Rd

The proposed termination of Bus 238 at the top of TZ will cause great inconvenience to all residents of Balmoral and Balmoral Slopes who currently access Taronga Ferry Wharf via Bus 238 and who return home via the bus from the ferry.

This alteration to the 238 bus service is suggested because of the proposed work site, for the construction of the lower station at the end of Athol Wharf Rd. 238 buses need to turn at the end of Athol Wharf Rd to proceed up Athol Wharf Rd and back to the zoo top gate and through the suburb to Balmoral Beach. The consequences of this change affect local residents and the many visitors to TZ balmoral beach and Middle Head.

2. Bus services for zoo visitors

At the present time, and since the closure of sky safari, zoo visitors who arrive by ferry, travel to the zoo top gate via standard Sydney buses. This service would also not be available if the work site is established at the end of Athol Wharf Rd.

The suggestion that patrons will access the zoo via the bottom entrance is questionable and does not reflect what patrons do.

Few zoo visitors enter via the lower entrance at the moment but use the buses to go to the top entrance. Entering at the top entrance allows visitors to move down through the zoo. This is clearly preferred to moving from the lower entrance uphill through the zoo, especially with small children and children in prams or strollers.

Importantly, the point of sky safari is to get visitors up to the top of the zoo from the ferry efficiently. Starting a zoo visit at the top is the way to go!

3. the minibus option

The consultant 'anticipates' that minibuses may run between the top of TZ and the wharf, to connect to ferries and to bring TZ visitors up to the top gate and others to connect with the 238 to Balmoral.

This 'anticipation' is not good enough. In order to avoid unacceptable impacts on all those people currently using Bus 238 to access the ferry network, the project proponent must commit

to the provision of a minibus throughout every day and evening to connect with every ferry departing/arriving at Taronga Wharf.

Even with a commitment to provide minibuses for all ferry services the addition of a "second" bus trip will make the connections more complex, less reliable and the chances of missing ferries will greatly increase. This is a significant inconvenience for those in the local community who use the bus service to the ferry. In addition, minibuses will be also be required to transport zoo visitors who wish to go to the top entrance. This will be most visitors when one considers the strong preference is to enter via the top entrance.

There are large numbers of people visiting the zoo throughout the day from every ferry, who will need a mini bus. *There will need to be a fleet of minibuses to meet the demand for transport to the zoo top entrance. Who will provide these services.* 

The minibus suggestion raises more questions than it answers and is not well considered nor does it indicate an understanding about how the local community and zoo visitors use public transport to and from the zoo ferry.

#### 4. The 238 and 100 buses

The suggestion that Bus 238 users can transfer to Bus 100 indicates a lack of understanding about the travel patterns of those who use these buses. The two routes are not "swappable" The 100 meets the needs of commuters travelling to Wynyard and QVB while the 238 supports travel to the ferry and then to the Quay. Another concern about the suggestion that the 100 and 238 are 'transferable" is the term "in the future" which suggests that the 238 service could be terminated. TfNSW has said nothing about this but the suggestion from the consultants is concerning and alarming. **This must be clarified.** 

#### 5. Walking through the zoo

In the past local residents could make their way to the ferry by walking through the zoo. This was particularly popular for journey to work trips. This could be revived during this project and should be considered

It is clear that the impact of the proposed work site on bus services for residents and zoo visitors is significant. Work sites should be located wholly within the boundaries of the zoo and should not use Athol Wharf Rd. The proponent should be asked to look at opportunities to do this.

#### F. Community Engagement

There are 3 "phases" of community engagement that apply to this project;

These are:

- 1. Community engagement prior to the preferred option for this project
- 2. Community engagement associated with the EIS process
- 3. Community engagement that is required during the construction phase of the project.

Each is discussed below.

#### 1. Community engagement prior to the completion of the EIS – Phase 1

Appendix D outlines the community engagement process undertaken prior to the completion of the EIS. A list of stakeholders and their concerns is provided in a table.

Significantly the table contains the dates of meetings with Mosman Parks and Bushland Association (MPBA), Headland Preservation Group (HPG) and Mosman Environment Group(MEG) but does not identify any issues that these groups raised at those meetings.

The issues raised about height of stanchions, impact on views from the water, tree cover, protection of vegetation, entry gates (protect heritage), and theme park nature of early proposals. are identified in relation to other stakeholder meeting outcomes. They are consistent with the views that the community groups raised but have not been attributed to them. The community groups indicated that the traffic impact of the zoo is substantial.

Importantly, Appendix D does not include the concern that the environment groups made about the process to exhibit and promote the EIS exhibition when that occurred. The points the environment groups made at the 24 May 2024 meeting, when it was clear the EIS was nearing completion, are as follows:

- If the exhibition period falls in the school holidays the exhibition time must be extended to cover that "overlap"
- Wide advertising of the EIS because of the National significance of the project. (Zoo is nationally significant on a Nationally significant site- the harbour). National newspapers perhaps
- Physical exhibition of the EIS important in the area
- Do not rely on Dept Planning Portal only .
- Exhibition at Council and the zoo
- Consider a CIFS (community information and Feedback Session) in a popular location such as Bridgepoint. Hold over a couple of days to promote community awareness and response to the EIS and foster better community understanding about the proposal.

#### 2. Community engagement associated with the EIS process- Phase 2

The EIS engagement process has been a very poor process, scheduled at a problematic and difficult time. None of the points made at the meeting of 24 May 2024 to support a robust community engagement process during the EIS exhibition period have been followed.

The exhibition period has included 2 weeks of the September school holiday period and was available only on the portal. An article in the Mosman daily about the proposal with a picture of the lower station made absolutely no mention of the EIS and the opportunity for comment.

It is understood, that in a letter to MPBA, DPHI advised that a hard copy of the EIS had been made available at the zoo. I have seen no advertisement or promotion about this opportunity.

The local government elections were held on 14 September 2024. The exhibition of the EIS for sky safari began on 24 September, before the Electoral Commission had declared the results of the election. With a closing date of 12:59 pm on 21 October 2024. Mosman Council, whose LGA hosts the zoo will not be meeting until early November to determine its views on the Sky safari proposal.

As an active community member I had hoped the timing would allow for the community and council to work together on a response to this critical Mosman based development. That has not been possible as the DPHI has indicated that it would not allow additional time for community engagement about the Sky Safari EIS.

#### 3. Community engagement that is required during the project's construction phase – Phase 3

The EIS does not identify any actions that should be taken as the project is delivered.

The sky safari project will have an impact on residents of Mosman and to all zoo visitors. It is very important to offer a comprehensive community engagement process, that is transparent and clear and delivered in a timely manner, to ensure that residents and visitors understand what is happening.

Such an approach is both respectful to these groups and is in the interests of community safety. The determination of the project EIS must include conditions relating to community engagement. It is an integral part of the project as the range of issues addressed in the EIS.

It is suggested that the following should be required in a community engagement strategy for the delivery of a new sky safari

- A community engagement practitioner is included as a key member of the construction project team
- The construction project team provides information and updates about the project on a regular basis in the following ways
  - Signage at construction sites. This should provide project updates, contact name, email address and number for information and clarification. The lower station site is a particularly critical site as there is a great deal of pedestrian activity in this area.
  - Clear signage at the ferry wharf and bus stops at the wharf and upper zoo gate bus stop about transport arrangements. It is noted that there is some confusion at the moment when zoo visitors get off the ferry to make their way to the zoo. There is one small sign only and a single staff member on hand to answer questions. The ferries discharge large numbers of visitors at any one time, throughout the day and the level of confusion is high. As a regular ferry user I see this every time I catch a ferry or get off a ferry.
  - Advice on the zoo's website information about the project and how it impacts visitors' journey to the zoo needs to be in a prominent position and updated regularly.
  - Communicating with the local host community. Project updates need to be provided in the local paper (though this has limited reliability because it is not widely circulated) and also in a letterbox drop. The previous area of 2,500 properties that the zoo undertook is not large enough. The areas affected by the 238 bus route needs to be targeted.
  - Record keeping of concerns raised The community engagement team member should, keep a record of all enquiries and concerns made so that the project team has a good understanding of community need and be ready to respond and manage the project
  - Advice about special work there might be occasions where the project could require particular tasks to be carried out that do not fit what the community understands the construction process to be. In these circumstances the project team needs to ensure that residents and visitors are made aware of any changes and the timing of these.

#### The need to provide information about changes to the Bondi to Manly Walk

The construction of the lower station will affect the Bondi to Manly Walk. The section of the walk from Sirus Cove to Athol Wharf will be closed during this part of the construction process. It will be necessary to set up an appropriate detour that is well signposted so that walkers know what is happening. Any detour sign should include advice about why this is necessary and the expected time frame. The route selected needs to be discussed with Mosman Council and the residents whose streets are affected also consulted so that they understand what is happening and the time frame.

In addition the web site for the walk <u>https://www.bonditomanly.com</u> should provide clear advice about this change to the walk route. There are many key stakeholders who are involved in this walk and each should be made aware of the temporary closure of this part of the walk.

#### G. Sky safari operations

There are a number of questions about the proposed sky safari and its operations that require clarification and further discussion before decisions are made.

- These are:
  - 1. Hours of operation

The previous sky safari operated during zoo opening hours and at Vivid (there was an additional charge on a Vivid ticket to cover this)

It is not clear what is envisaged for the proposed sky safari.

While the EIS states that sky safari will be available during zoo opening hours it also alludes to sunrise and sunset use.

Ideas for an increase in operating hours need to be clear and discussed with the local community who will bear the external costs of any expanded availability.

2. Cost of sky safari

In discussions with the zoo over the last few years there has been no clear advice about charges for sky safari use. There was no additional cost to use the now retired sky safari. There has been no confirmation that this will be the case for the proposed sky safari. There is a need for the zoo to be upfront about whether sky safari use for zoo access will incur an additional cost. Any suggestion of sunset and sunrise use begs the question of cost/one off payment.

3. Height of sky safari

As stated under visual impact the height of the proposed sky safari is excessive. It will have a significant and adverse visual impact. It seems to be a disproportionate increase in height compared to the retired sky safari even considering the larger gondolas. I am concerned that the motivation for this excessive height is about achieving bigger and more expansive harbour views from sky safari and not about the space required to accommodate the gondolas. This must be clarified. There are many opportunities within the zoo to enjoy fabulous harbour views. Protecting the harbour from any adverse visual impact must be an overriding consideration in determining the height of sky safari.

4. An attraction in its own right

The sky safari may become a visitor attraction in its own right. This has implications for traffic volumes and peak parking for those who travel by car.

There is a need for the zoo's intention re sky safari to be made clear. Use, cost and whether it is promoted as an attraction in its own right need to be clarified and discussed.

# **Conclusion and summary**

# Visual impact

The proposed sky safari will have a significant and adverse impact on views from the harbour. Its height must be reduced.

- (i) Careful pruning of the hoop pines could achieve a big reduction in the height
- (ii) There should be no advertising at all on the large gondolas.
- (iii) The existing large tree (listed as 468) should be retained to mitigate the visual impact of the lower station

# Arboriculture Landscape and biodiversity

To protect existing and new vegetation there must be

- a clear undertaking and a condition of consent that includes all of the protocols
  (arboricultural method statements) for each separately identified tree so that the trees
  are protected during the construction process and can thrive after construction.
- (ii) Regular monitoring of these trees must be undertaken and reported on regularly throughout the construction of the stanchions.
- (iii) Proper training of all construction staff to ensure all are aware of the protocols.
- (iv) The continued oversight of an Arboriculturist in this process . This requirement must be included as a condition of any consent
- (v) a project ecologist to supervise any vegetation clearing and to replace logs and branches

# **Construction management**

Not enough is known about construction impacts because the HC and CCC have not been selected.

- (i) The following principles for construction should be required of any selected contractor
- ✤ Protect the amenity and safety of the community and zoo visitors at all times
- Working hours for construction (not at night, Saturday afternoon or Sunday)
- ↓ Noise including machinery used- no hydraulic pick excavation
- Provide clear information and project updates throughout the project
- Traffic routes and vehicles. Haulage of materials and spoil must follow designated roads (eg Bradleys Head Rd-Military Rd only).
- Provide effective waste management processes
- Protect all trees and vegetation except those approved to be removed. Implement the advice in the arboriculture appendix
- (ii) Provide a comprehensive erosion and sediment control regime throughout the entire project to protect the harbour's receiving water.
- (iii) The work site at the end of Athol Wharf Rd must be reviewed . A site within the zoo grounds should be established to ensure the safety of residents and zoo visitors .

# **Traffic and Transport**

The amenity of residents and the safety of all in the vicinity of the zoo must be the driving factors to consider in relation to traffic. The local community has had plenty of experience in living with zoo traffic and zoo construction traffic. Issues that are important to consider include:

- (i) Work hours
- (ii) Traffic routes

- (iii) Construction vehicles used. Need to look at those vehicles taking spoil from the site. This has not been addressed.
- (iv) Impact on congestion throughout Mosman

The transport arrangements suggested in the appendix are probably unworkable and need a total review.

- (i) The 238 and 100 buses are not interchangeable
- (ii) The proposal for minibuses does not recognise the implications for timetables or the number that would need to be used to support local commuters and the many zoo visitors who arrive and leave via the ferry throughout the day.
- (iii) These transport challenges are a direct result of the lower station worksite on Athol Whard Rd it must be reviewed and a site within the zoo grounds established.

Consider access though the zoo to the ferry for local residents.

#### Community Engagement

A robust community engagement process must be included as a central component of the construction process. It needs to:

- (i) Include a community engagement practitioner as a key member of the construction project team
- (ii) Ensure all staff understand the importance of respectful engagement with the community
- (iii) provide information and updates about the project on a regular basis in the following ways
- Place signs at construction sites. Setting out project updates, contact name, email address and number for information and clarification. The lower station site is a particularly critical site as there is a great deal of pedestrian activity in this area.
- Place clear signs at the ferry wharf and bus stops at the wharf and upper zoo gate bus stop about transport arrangements
- Update the zoo's website regularly.
- Communicate with the local host community use mail out, websites, local paper, notices in busy local centres e.g Bridgepoint
- Keep good records The community engagement team member should, keep a record of all enquiries and concerns made so that the project team has a good understanding of community need and be ready to respond and manage the project
- Advice about any extraordinary work *special work* there might be occasions where the project could require particular tasks to be carried out that do not fit what the community understands the construction process to be. In these circumstances the project team needs to ensure that residents and visitors are made aware of any changes and the timing
- (iv) Ensure the impacts on the Bondi to Manly walk, including detours are communicated, understood and clear

#### Sky safari operations

The zoo must clarify its intentions re the use of sky safari. This relates to cost/charge for use and hours.

**Rosemary Adams** 

20 October 2024