OBJECTION TO TARONGA ZOO SKY SAFARI Rosemary Adams

I object to the proposal for sky safari as outlined in the amended application which has been on the Department's portal from 14 May 2025.

The reasons for my objection are outlined below.

Design is for a harbour view not just accessibility.

The Zoo advises that the new sky safari aims to provide a cable car facility that is accessible. There are statements throughout the design appendix that indicate that the design of sky safari is about achieving harbour views.

P14 "the upgrade provides a new way to experience Sydney Harbour" (Sec 2.4 Why the upgrade)

P15 "The new sky safari will be a spectacular and accessible experience" (Sec 2.3 Geographical significance)

P16 "Show case Sydney Harbour" (sec 2.5 Revitalised Sky Safari Offer)

Visual Impact and the inadequacy of its assessment 1 Visual impact

The visual impact of the proposal is the most significant consideration in assessing this proposal. This is because the Zoo is located on Sydney Harbour. The harbour is the jewel in Sydney's crown. Views from the Harbour are of National and International significance and must be protected.

The zoo currently sits comfortably and unobtrusively on its site at Bradleys Head. It respects the harbour. This will change with the proposed sky safari. The following aspects of the sky safari have a direct and adverse effect on views from points all over the harbour.

- **Pylon heights are excessive**. In the amended proposal they range in height from 5.9m above the lower station platform to 36.5m at Pylon 5. Pylon 5 height is equivalent to a 10 storey building. The pylons and cableway can and should be reduced in height. It should begin its descent at pylon 4.
- **Pylon heights and hoop pines** It has been argued that the pylons need to be as high as they are to protect the two hoop pines. The arboriculture appendix indicates that it might be necessary to lop the pines at the top. There is no suggestion that this will be detrimental to the trees. Given this position the hoop pines could and should be trimmed to allow the cable way to go between the trees and reduce the pylon heights.
- **The gondolas** are large, there are up to 25 of them and they will be moving. They present a significant impact on views of the sky safari from the harbour. They have been omitted from any photomontage in the visual impact appendices
- **Lower station** the increase in the footprint of the lower station and associated loss of vegetation is of concern. The lower station and its ramping to the west will be obtrusive and bulky and will be visible from many parts of the harbour

- Images of lower station limit understanding the eastern elevation image of the lower station is a prominent image in a number of amended plan documents. It is on the front cover of the Submissions and Amended plan report for example. I can find only one image of the western elevation /view of the lower station with its extended footprint and substantial vegetation loss. The presentation is unbalanced and somewhat misleading. The architectural plan Appendix G offers one plan of the western elevation. See p17. All relevant appendices focus on the upper station and the eastern view of the lower station.
- Hours of operation and light impact on harbour The zoo is seeking agreement in its proposal for extensive hours of operation. The hours sought range from 5am(EST) or 6am (EDST) until midnight. The frequency for these out of standard zoo operating hours is not clear. The zoo will need to provide light to the stations and each of the gondolas moving along the cables and this will lead to a further and adverse impact on views from the harbour. Appendix K, the lighting report does not include any indication of lighting from the gondolas.

2 Inadequacy of visual impact assessment

In relation to visual impact the SEARs requires the following:

- Provide a visual analysis of the development from key viewpoints including photomontages or perspectives showing the proposal and likely future development
- Where the visual analysis has identified potential for significant visual impact provide a visual impact assessment that addresses the impacts of the development on the existing catchment

It is considered that the Visual Impact Assessment (Appendix L1) and the Visual Impact Assessment Methodology Appendix (L2) do not adequately assess this central "nub " issue for determining this SSD and the VIA does not meet the SEARs requirements.

These are the problems/deficiencies in the VIA

- Gondolas have not been included in VIA images (see 1 above)
- **Night lighting of gondolas is not included** (see 1 above)
- Focus on the views within the zoo and views from the zoo of the 28 viewpoints referred to in the VIA, 16 are from within the zoo. Of the 4 key substantive issues for consideration by the VIA, 2 are internally focussed. They relate to integration with the landscape when seen from inside the zoo and interruption or blocking of high value views from the Zoo (p33 VIA) The assessment strongly focusses on internal In contrast harbour are presented as secondary and less important considerations See commentary below)
- Views from outside the Zoo This is one of the 4 key substantive issues that the VIA includes (p33) and is described as Integration with the landscape when seen from outside the Zoo. THE VIA explains that this means ensuring the proposal:
 - o Is not visually prominent •
 - Maintains the dominance of landscape over built form •

- o Ensures built form does not break the tree canopy
 The height of sky safari pylons its many moving gondolas and its bulky lower station do not meet any of the requirements of that key substantive issue. Given that the views are those from Sydney Harbour this is a critical "non compliance". The VIA is inadequate because it does not give the "non compliance" the significance that it deserves and requires.
- Images of "post construction" misleading The various images of post construction in the VIA are deficient at best and misleading at worst. The VIA does not include the many gondolas on the cable way. as stated earlier. Importantly the images of post construction do not account for any tree loss. There is no difference in images of vegetation when you compare the pre and post construction images. This is a critical omission. The Tree Management Plan (TMP01A) in the Aboriculture report shows significant tree loss, particularly immediately to the north west of the lower station and its ramps. The visual impact of the large lower station and associated ramping, viewed from the harbour looking east is substantial because of its size and the loss of tree cover.
- Landscaping and the verticality of pylon elements The VIA notes that the verticality of the pylon elements and cable way exceed the height of the dominant canopy line. The VIA assumes that supplementary planting and ongoing maturation of existing vegetation will mitigate the verticality of sky safari over time. This is disputed strongly. The height of Pylons 4 and 5 are very high (10 storey building height) and it is extremely unlikely that any planting will mitigate their substantial visually intrusive impact on Sydney Harbour. There is a need to consider reducing the height of the pylons and trimming the hoop pines to facilitate this.

3. Other concerns

Size of gondolas The gondolas are not clearly shown in the documents. Importantly we do not see them on the cable way. We know they are large and will provide access for double prams and wheelchairs. While it is important to accommodate these special needs only a very small percentage of patrons require this. There needs to be some discussion about how many of the 25 proposed gondolas need to be so big. Reducing the number of large gondolas would improve the visual impact of the proposal. Arguments that the cable way needs to be so high to accommodate the large gondolas would not be sustained. (It is argued in this submission that the cableway and its intrusive pylons can and should be reduced in height to protect the iconic views of Sydney Harbour, irrespective of cable size). There are significant benefits on reviewing the size of the gondolas and their number.

Designing for mega peak use. The number and size of gondolas appear to have been selected for mega peak use which is identified in the documents as the first week in January. It is an overkill to introduce a scale of development that has so many adverse impacts and is only needed at that scale for a very limited time. There is a need to review the number of gondolas and their size. There would be substantial financial cost benefits as well as substantial environmental benefits in reviewing this

EPBC Act. It is considered that this proposal should be considered under the EPBC Act This is because of the view impacts from the Sydney Opera House and Garden Island which like the SOH is a site of national significance.

Increased excavation the increased excavation necessary for the amended plans of the lower station and its ramping requires robust erosion and sediment control measures to protect receiving water quality of Sydney Harbour.

Stormwater Appendix I Civil Plans Siteworks and Stormwater Drainage Plan (p6) indicates that the proposed development would connect to the existing stormwater pit on Athol Wharf Rd. If this pit is outside the proposed work zone this work will cause disruption to bus services on Athol Wharf Rd for zoo patrons and local residents who use the ferry. There needs to be clear advice about when this work will be undertaken and how any disruption will be managed for the community.

Hours of operation and transport choices As stated earlier in this submission the operating hours for sky safari have not been adequately defined. They are extensive and their frequency is not provided. Arguments about public transport use cannot be sustained for zoo patrons using sky safari during these extended hours.

The first ferry of the day arrives after 7am and the last ferry leaves the zoo just before 7 pm. The zoo needs to provide more information about its plans for extended sky safari use and clarify transport arrangements.

Hours of operations and noise The proposed extended hours will generate noise from Sky Safari operations itself and from patrons. Noise travels well across water and the community living in the Raglan St area (Curraghbeena Point) and Cremorne Point area will be particularly impacted. Residents to the north of the zoo in Bradleys Head Rd, Prince Albert St and Whiting Beach Rd will also be affected by noise (patrons and associated vehicle movements). These communities need a clear understanding about what is proposed as they will bear the cost of noise impacts.

Conclusion

I **object** to the proposed amended plans for the Zoos sky safari. For the many reasons outlined above.

This proposal will have an adverse and significant impact on views from Sydney Harbour. Bradleys Head is characterised by its unspoiled bushland and offers world class views of Sydney bushland from all over the harbour. The zoo site sits comfortably and respectfully on its site. All this will change if the proposed Sky Safari proceeds

The sky safari will be a permanent scar on Bradleys Head and a permanent scar on views from Sydney Harbour to Bradleys Head. It is designed to capture fleeting views of the harbour and presents as a Disney style /luna park ride. The efficiency of the

proposed Sky Safari in terms of time to move patrons (2 minutes) which is presented as a positive aspect of the proposal, emphasises the fleeting nature of the views from this ride. It's been overvalued and will generate a huge and unacceptable environmental cost

The documentation in the various appendices, especially the VIA appendices (L1 and L2) is unsatisfactory and does not adequately address the SEARs. Too many important aspects of the proposal have either:

- not been included (lighting of gondolas, images of gondolas on the cableway, vegetation loss at critical points) or
- are unclear/ avoided (frequency of extended hours, images of western elevation of the lower station and its ramps).

I question whether any consent authority for this proposal could reliably and validly determine this proposal given the significant omissions from the material provided for assessment and the significant environmental impact of the proposal.

It should be refused.

Rosemary Adams BA MTCP

9 June 2025