

HPG RESPONSE TO TARONGA ZOO SKY SAFARI RESPONSE TO SUBMISSIONS AND AMENDMENT REPORT FOR SSD-46807958

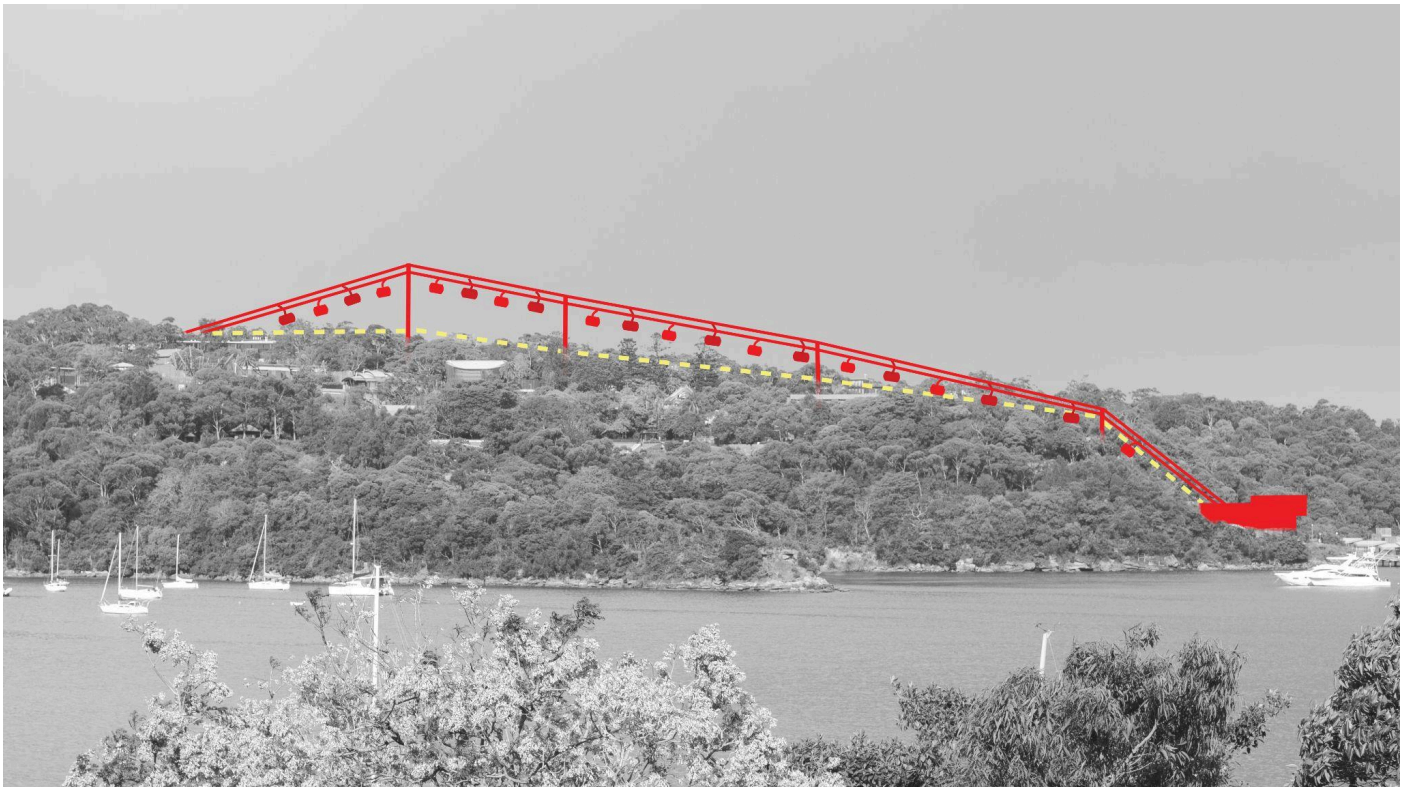


IMAGE: Diagrams showing the full visual impact of the development are missing from the proposal documents.

This image is HPG's interpretation showing the visual impact of the new Taronga Zoo Sky Safari. The highest pylon will be as high as a 10-storey building and the Sky Safari will feature up to 25 larger cabins, the pylons cables and cabins are shown here in red to make it clear that the development will be visible from many land-based and harbour vantage points.

The yellow dotted line represents the height of the previous cable car system.

Headland Preservation Group

10 June 2025

HPG'S OBJECTION

Introduction

The Headland Preservation Group (HPG) welcomes the opportunities to respond to the Taronga Zoo Sky Safari Amendment Report and to discuss in person the concerns of HPG and its constituency.

HPG notes that, although some changes have been made to the logistical aspects of the project such as reinstating bus access to the ferry wharf, there has been no attempt to address concerns regarding the visual impact. In fact, amendments necessitated by design changes have increased the negative impact on natural values.

HPG wishes to make clear its objection to the height, bulk and general impost of the proposed structure whilst recognising Taronga Zoo's need to provide a safe, accessible internal mode of transport from the ferry wharf. It is HPG's opinion that the true environmental and visual impact of the Sky Safari project has not been fully explored or adequately explained. As a State Significant Development, there should be better modelling for exhibition and public understanding. There has been **no assessment of the impact of the total structure – pylons, cable PLUS cabins.**

In addition to this Submission, the concerns expressed in HPG's Submission on the EIS SSD-46807958, dated 17 October 2024, remain relevant. In particular, *"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.**"*

Strategic Priorities of the DA

Taronga Zoo has outlined the core drivers of the development of the Sky Safari as follows: Accessibility, Guest Experience, Conservation, and Ageing Asset. Yet statements in the DA, such as below from the Design Report, indicate that **the key vision is to create a new tourist experience beyond the enjoyment of the Zoo.**

"At the outset of the project, the Client team established the following key vision for the project. To elevate the Zoo experience while not adversely impacting the Zoo guest experience, maximise iconic views of Sydney Harbour and

Connection to Cammeragal Country, and create an exciting new globally recognised attraction for Taronga Zoo."
(Page 16 Appendix F – Design Report).

The core driver of the actual design would appear to be to *"provide something new and excitingcompelling national and international guests to visit and be inspired by the view...."* (P76 Justification of Amendments 3.6.2).

HPG contends that a mode of accessible and safe transport for internal Zoo traffic, which would also allow visitors to experience the Zoo from above, would NOT require such invasive infrastructure. It seems clear that creating a viewing experience for tourists, who may not even be visiting to see the animals, is paramount for the organisation, hence the 36.5 metre high point.

Visual Impact

It is HPG's view that **the Visual Impact Assessment (VIA) in the Environmental Impact Statement (EIS) grossly understated the visual impact of the project.**

"...the proposal will not have a major visual impact on any viewpoint." (Heritage P36).

The visual impact of the new Sky Safari from outside the Zoo has been underestimated. It will significantly affect neighbouring Mosman and Cremorne, as well as anyone boating or riding ferries on the Harbour, major heritage landmarks such as the Opera House and suburbs and historic public viewing points on the southern shore.

Taronga Zoo is a strategic foreshore site under the State Environmental Planning Policy (Biodiversity and Conservation) 2021(SEPP 2021). No attempt has been made in the Visual Impact Statement to assess the impact of the Sky Safari on views from the many heritage items in and surrounding Sydney Harbour, pursuant to SEPP 2021, Part 6.4 s6.52(f)(i), including but not exclusive of the following:

- Opera House.
- Fort Denison
- Garden Island
- Clark Island
- Bath House and Jetty
- Man O'War Steps

An independent investigation, including an analysis from an accredited sight-line specialist, and assessment of the visual impact of the Sky Safari on the heritage items should have been carried out and should have informed part of the Amendment Report. This omission must be rectified.

The Amended VIA in the Response to Submissions reads on P4 Table 1, *'Visual impact arising from a proposal is (sic) this nature is unavoidable. What is important is whether appropriate steps have been taken to mitigate this impact to an acceptable level It is considered that this has occurred.'* Mitigation is one thing, but **for the applicant to recognise the impact but not having it exhaustively investigated and assessed is unacceptable**. Who determines the 'acceptable level'? It appears from the responses that the community does not agree it is acceptable..

HPG acknowledges that considerable time has been spent on planning and designing the new Sky Safari. However, it is concerned that a fundamental aspect of the design (the size and weight of the gondolas themselves), which determines the overall structure, was not decided when the EIS was lodged. Therefore, the true impact was not known when the DA was released to the public in September 2024. Considering the amended DA involves more structural excavation and incursions into the landscape, it seems hasty to proceed without an Amended Visual Impact Assessment which reflects a proper investigation and transparent public exhibition.

The Visual Impact Assessment excluded 'consideration of the cable cars' (P 27). Surely the constant movement of 20-25 cable cars during operating hours warrants consideration in assessing the impact of the overall structure? **The proposal makes no attempt to illustrate the effect an increased number of gondolas and an increase in their frequency will have on the visual impact** when viewed from various vantage points e.g. from the harbour, from land points such as Cremorne Point.

The Amendment Report states *"The consistent feedback from stakeholder engagement is that the proposed design has clearly responded to feedback on animal welfare, heritage, tree canopy, remnant bushland and views."* HPG disagrees with this since concerns expressed about the visual impacts on Sydney Harbour and surrounds, including heritage sites, have been ignored.

Pylon Heights

HPG notes that the pylon heights have not been reduced; the maximum height is still 36.5 metres (equivalent to a 10-storey building) at P5. The revised design has necessitated increased heights for P1 and P2 and revisions to P5 'to allow for additional structural support' ("SSD-46807958 Re-exhibition Notice") to handle the weight of the gondolas, as a result of 'ongoing consultation with the cable car contractor.'

The DA assessed whether the new Sky Safari could be constructed at the height of the old cable car system, determining that it would not conform to current planning regulations. However, there was **no attempt to find a middle solution that would satisfy regulations while lowering the overall height and lessening the visual impact**. Instead, the proposal contends *"the proposed height is unavoidable to fulfil the proposal's intent"* (P66 S3.5.1). This 'intent' is the key driver behind the structural requirements, and as stated before it is that which should be questioned.

There is no engineering justification for the 36.5 metre height given, rather the decision rests on preservation of the two heritage hoop pines which would be affected. These trees will be lopped whatever the height, and indeed have been in the past. The corridor has increased from 9 metres to 12.5 metres under the new development. Taronga Zoo maintains that if the height of the pylons is reduced, the corridor would need to be wider, resulting in the removal and trimming of more trees; however Taronga Zoo offers no evidence to support this conclusion. (Appendix HH Landscape 3D views)

Gondolas

The new Sky Safari will have 20-25 cabins continually moving throughout operating hours. That is 10-12 up, coinciding with 10-12 down over the 916 metre line of cable. The impact of this on the skyline towering over the bush canopy is considerable. Despite this, **the DA does not include illustrations featuring the cabins on the cables** to help the public understand how this will look.

The design allows for these accessible cabins to be larger and, therefore, heavier, now accommodating 10 people / wheelchairs / large prams. However, HPG has been informed the design, aesthetics and lighting have not been finalised, making it difficult to get a picture of the true impact.

Expansion of Lower Station

The Lower Station is a large structure. Whilst an attempt has been made to create a structure that fits into the landscape with well considered design elements, it will be a very dominant feature visible from a distance. Granted, moving the ramp from the eastern side to the western side will create a less intrusive visual from the street approach. The disturbance of the landscape, however, and **removal of 55 trees is significant**. There is no illustration showing how the Lower Station will now look from the western side. HPG presumes the removal of the 55 trees will expose the larger structure to western viewpoints.

The 'refinements' to the Lower Station and the increase in height of pylons P1 and P2 have been made to meet safety and clearance requirements of the cable car. HPG considers it dissembling to characterise this as an improvement to queuing. These technical requirements should have been considered in the original EIS. As the cable car system is fundamental to the design of the project, HPG is of the opinion that the EIS was released prematurely before a provider was selected. It appears to be a waste of taxpayer dollars.

Illumination

The impact at night is important. Increased illumination from the Lower Station and 20-25 moving cabins during the proposed extended hours will further impact and urbanise the dark natural headland, whatever mitigation measures are taken. The proposal cites existing illuminated structures, including the Zoo's own developments such as the Taronga Centre, as justification for adding one more illuminated development. There is no excuse to refer to existing illuminated structures which sit within the vegetation coverage to justify the addition of an illuminated structure which protrudes from and sits high above the landscape.

Disruption of Natural Landscape

Tree Removal will no doubt be required on any development within the Zoo site. However, for the Sky Safari project this could be minimised if the vision for this new tourist attraction were not so grand. On p72, S3.5.5 of the Amendment Report states '*additional tree removal* (of 55 trees on the western side of the expanded Lower Station) *is necessary to meet the infrastructure and servicing requirements of the cable car supplier.*'

It takes a long time for replacement planting to achieve mature growth. The DA allows for planting elsewhere around the Zoo in line with the 2:1 policy, but there is no guarantee that this will compensate for the canopy loss on the headland area. The plan also suggests carbon offsets, but this is not an acceptable alternative for this sensitive site.

The corridor required for the cable car route has increased from 9 metres to 12.5 metres. According to the DA, this corridor must be kept clear and no replacement planting will be undertaken. As it stands, this will create a considerable scar on the hillside.

Community Engagement

The Taronga Zoo Sky Safari is no standard development within the confines of the Zoo site, such as the addition of the hotel or hospital, and screened by the bush canopy. Instead, because **of the impact on the entire vista of Sydney Harbour and the interruption of the natural values of the headland, the Sky Safari is a project of great significance to the community at large.**

Taronga Zoo has engaged with local stakeholder organisations such as HPG, but HPG posits that the public has been largely kept uninformed about the extent and true impact of the project. Articles did not appear in the local media such as Mosman Daily until half way through the consultation period. From speaking with members of the community, HPG has been surprised at how **many are either not aware of the development or are unclear about the overall visual impact.**

The EIS with DA and a vast number of supporting documents was put on exhibition for four weeks only (the minimum requirement) and this occurred during the school holidays and Council elections. The Submission Response and Amendment Report is no less dense for people to absorb and respond to, with 39 supporting documents.

In any documents for public exhibition, artist's impressions or photomontage are critical to convey the visual impact of the project. The DA includes an impression (faint) of the pylons and cables, but it is disappointing that the cabins are not included. Including 20 cabins plus the pylons gives an accurate picture of a transformed skyline. HPG understands that these were excluded for reasons of accuracy (the cable car supplier not having been decided), yet artist's impressions of the cable cars appear elsewhere in the DA. This is an egregious omission.

Likewise, the most significant amendment in the revised EIS is the expansion of the Lower Station and the repositioning of the ramp and entrance. As noted, this involves removal of 55 trees. However, there is no attempt to illustrate this change to the design and the western aspect of the Lower Station. There is only an architect's plan which the layperson can find difficult to visually interpret.

Omissions in the Amendment Report regarding important information are unacceptable and mislead the public. For example, **S6.52(f)(i) of the State Environmental Planning Policy (Biodiversity and Conservation) 2021 (SEPP) is a crucial requirement for compliance but it is missing from the DA.**

Taronga Zoo is a much-loved attraction and an iconic part of Sydney's foreshore. The public has developed strong affinity with the Zoo, and therefore many accept without scrutiny the Zoo's assurance that the Sky Safari is merely a (better) replacement for the old cable car system. It is HPG's experience that **the community does not have a clear concept of the impact of the new Sky Safari** and is merely looking forward to having it up and running again. This cannot be mistaken for support of the project.

The submission process, executed via the NSW Planning Portal, is daunting for many who would prefer to send an email or letter to express their views. This bureaucratic requirement is understandable given the many state projects that are underway at any given time, but it is **not community-friendly**. Offering this as the only method of lodging a submission HPG believes is discriminatory. Furthermore, for a period in the days leading up to the close of submissions, the portal was not accessible, causing frustration. Furthermore to add to the confusion **as recently as Monday 9 June 2025 the portal clearly stated "submissions closing in 14 days."**

Conclusion

HPG objects to the height and mass of the Sky Safari development and its intrusion on the landscape of the headland. If allowed to proceed in its current form, the Sky Safari will have a detrimental impact on the scenic beauty of Sydney Harbour for the next 40 years.

Taronga Zoo has not transparently conveyed the visual impact of the development to the wider public. While the various interest groups were invited to meet with Taronga Zoo executives, there has been a failure to adequately inform the public and hold a public forum to explain the amendments.

In summary, it is HPG's opinion that **the grand vision for an exciting new visitor attraction is ill-conceived and sets a dangerous precedent, with far greater implications for the unique internationally-lauded Sydney Harbour**. The towering structure is at odds with the natural and heritage values of this part of Sydney Harbour and the proposal ignores the significant and permanent visual impact it will have. The project should be halted and a scaled-down accessible internal solution for Zoo traffic should be sought.

Jill L'Estrange

President HPG

on behalf of the HPG Committee:

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10 June 2025