A retired, experienced Town Planner and Project Manager lodged this objection to the development application.

Rather than a submission, this is an **objection** to the proposed Zipline development..

1. **Introduction**

This proposal is **wrong** in every conceivable way. It is **wrong** in that it is being mis-represented. In effect it is a proposal to develop a commercial adventure park in Mount Coot-tha Forest Park, a designated public park which is a rare and valuable broadacre recreational resource in a city with a fast-growing population.

Specifically**,** and **first** and foremost, it is wrong because approval is being sought from one department of Brisbane City Council from another department of the City Council. Without the intervention of the State government exercising its powers under the Deed of Grant in Trust or in relation to the proposed new Land Management Plan, it is inconceivable that this application will be refused despite its flaws, which are manifold.

This is Caesar judging Caesar. It is redolent of the Gold Coast in the early 1970s when the Canadian planning consultants to Cambridge Credit, the biggest developer in the Albert Shire, were also appointed to prepare the Albert Shire planning scheme. This arrangement was howled down and so should this Zipline proposal. If this cosy arrangement is deemed to be legal it simply shows how deeply flawed is the State planning legislation.

**Second**, the role of Brisbane City Council is to provide municipal services as required under the local government act and any other works or services that enhance the quality of life of its residents (ratepayers). It is not within the ambit of Brisbane City Council to spend upward of $18 million of ratepayers’ funds to enter into public-private partnerships to develop commercial businesses for which there is no demonstrated **need**.

The fact that there is no demonstrated **need** for this development is amply illustrated by the hundreds of submissions from Brisbane residents which are almost unanimously opposed to the development.

With very few exceptions, the only submissions in favour of this development are invalid because:

1. They have been submitted by Zipline Australia, which is a party to the application and a beneficiary of the development;
2. The individual applications submitted by Zipline Australia are not addressed to ‘Development Assessment’ as required of a properly made submission but to hello@zipline-australia.com.au;
3. Not all of these submissions contain addresses as required of a ‘properly made submission’.

Even if these submissions are deemed valid (which would expose another shortcoming of the State planning legislation) they should be treated as a single submission in the same way that a submission to the Taringa Neighbourhood Plan signed by 98 residents (58% of all households) of Marmion Parade, Montrose Road and Woodstock Avenue was treated as a single submission.

**Third**, the development delivers negligible **benefits** to the Brisbane ratepayers who are paying for it and numerous dis-benefits (see later). The so-called eco-tourism benefits it offers are merely high-cost alternatives (in the order of $55-$120 for adults) to obtaining nature-based experiences via ‘a walk in the park’ and views that can be enjoyed at no cost from the Mt Coot-tha Lookout.

Even when undertaken in the context of necessary infrastructure, such as airports or hospitals, public-private partnerships have a history of failure. Closer to home Brisbane City Council’s ‘City Cycle’ partnership with JC Decaux is costing ratepayers in excess of $1 million a year in subsidies. There is no guarantee that the Zipline proposal will be any different requiring ratepayers to subsidise the operation indefinitely.

**2. Project Assessment**

Apart from lacking a credible feasibility study to underpin the cost/benefit analysis and economic impact statement the project fails to satisfy any of the ten assessment criteria developed from the evaluation of six Queensland[[1]](#endnote-1) examples and several overseas examples[[2]](#endnote-2) of failed government tourism ventures as summarised below:

**First, the ‘attraction’ has no strong core theme.** It is an adventure playground masquerading as an eco-attraction. Contrary to the statement in the Economic and Social Impact Assessment it is not an attraction that is *“not available elsewhere”* (p2), there are no less than 14 similar zipline attractions in Australia, the nearest as close as Mount Tambourine. Most international tourists come from New Zealand where there are no less than six similar attractions, with another five in other neighbouring countries such as Indonesia and Guam.

**Second, it has not been demonstrated that the Zipline is the optimum medium to portray the alleged eco theme and enhance visitor experience.** What other options were considered to enhance the experience of visitors to Mt Coot-tha? What were their relative cost and benefits compared with the Zipline?

**Third, the attraction is not innovative.** Like the ‘Wheel of Brisbane’ the Zipline is another Brisbane ‘copy cat’ attraction. Whatever is meant by it being “*a world class experience”* (p2), it is one that can be readily replicated almost anywhere in the world (Belize, Nepal [where there are real mountains], U.A.E anyone?) - so it is unlikely to attract anyone to Brisbane unless they were coming here for other purposes.

**Fourth, it is not the optimal conservation approach.** Clearance for towers, launching and landing stations and associated visitor centre and gift shop will cause the unnecessary loss of vegetation of up to two hectares according to CPR Group spokesman, to create aerial views of flora, fauna and Aboriginal heritage that can be better viewed from the ground from footpaths or along much less costly boardwalks. Other adverse impacts on local for a and fauna are covered in other submissions by people far more qualified them me.

**Fifth, there is no identified product market – (i.e.** a bounded area within which the enterprise can compete successfully with substitutable products or services). The product is not innovative and does not offer any experiences that are not available elsewhere (as close as Tamborine Mountain). Has the potential market been profiled and what competitive advantage does the MT Coot-tha zipline have over other competing attractions?

**Sixth, there is no feasibility assessment to demonstrate the Zipline’s operating viability.** The numerous reports supporting the application show no evidence of any kind of objective feasibility study. Without a feasibility study profiling target markets and estimated market sector penetration rates and without patronage projections and estimates of average patron expenditure for each component of the operation over the first five years of operation the cost-benefit analysis and economic impact study are simply ‘pie in the sky’. Without this how can it be known whether the annual operating revenue will cover the annual operating expenses estimated to be $2.8 million in 2019 rising to $9.5 in 2031?

Where is the analysis underpinning the unsubstantiated estimate by Zipline Australia (one of the partners in the project) that 348,000 people will visit the attraction in 2021? Where is the analysis supporting the statement that patronage will increase at 5% per annuum thereafter? Has the patronage estimate of 348,000 in 2021 been validated by comparing it with other similar attractions already operating?

The research shows that typically patronage of government funded and/or initiated tourism ventures declines after the first (novelty value) year. For example, when Townsville’s Great Barrier Reef Aquarium, (now Reef HQ), opened in 1988 the attendance was 302,600. Thereafter visitor numbers declined progressively. Ten years later visitor numbers were down to 106,900 and by 2001 visitor numbers had plateaued at around 81,000. The aquarium only achieved an operating surplus in the first two years of operation and by 2001, the Commonwealth government was providing over $1.0 million per year in operating subsidies. The Australian Stockman’s Hall of Fame and the Waltzing Matilda Centre show similar, albeit less dramatic, falls in patronage.

Closer to home lessons can be learnt from the performance of the **Gondwana Rainforest Sanctuary** in the South Bank Parklands. This was a created ecosystem contained within a geodesic dome as a huge walk-through bird [aviary](https://en.wikipedia.org/wiki/Aviary) containing many species of Australian birds and mammals housed within a range of sculpted concrete panels coated and sprayed to look like rock. The Sanctuary went into receivership in 1993 within a year of opening due to the cost over-runs and was finally closed down in January, 1998 due to insufficient patronage. No doubt the cost of dismantling the dome was borne by South Bank Corporation and was reflected in subsequent rents and parking charges. This project was innovative at the time in that it offered a graded walk (more physical exercise than sitting in a zipline sling) up to canopy level among the fauna within which could be observed at one’s leisure. If this could not succeed in the much more accessible and much visited location like South Bank how is the Zipline with, presumably, higher capital and operating costs, expected to be viable in a much less accessible location? And, if it fails, who will bear the cost of dismantling it? Brisbane ratepayers, no doubt!

Regarding economic benefits, Zipline Australia estimates that 60% of visitors will be domestic visitors from outside of South East Queensland (i.e. overnight visitors), 25% from South East Queensland (i.e. daytrippers) and 15% from overseas. The research shows that, typically, the visitor origin profile for similar attractions in Australia is that around 50% to 60% of visitors come from within the daytrip catchment, 35% to 45% are domestic visitors and about 5% from overseas. How has Zipline’s calculation of market sources been derived and why is it so different from other tourist attractions? If only 40% to 50% of visitors rather than the 75% estimated by Zipline Australia require overnight accommodation this has a marked negative impact on the economic impact of the proposal.

**Seventh, where is the commitment to, and the assured source of, funding to subsidise the operation in the event that the operation is not operationally sustainable?** Judging from the almost universal opposition to the project the ratepayers of Brisbane would not willingly support the operation even if the aggregate net benefits prove to be positive.

**Eighth, confirmation that there is strong community support for the enterprise.** Up until the 10th of December, apart from the submissions made by Zipline Australia which should be deemed invalid for the reasons stated above, all but a very few submissions were universally opposed to the project. There is no community support for this project, and for very good reasons.

**Ninth, what is the level of significance of this project?** Does it justify the level of Council funding, in excess of $18 million, compared with other options? How reliable are the cost estimates? If a minor street corner ‘beautification’ project at the corner of Hillsdon and Goldsbrough Road in Taringa cost $300,000, how much confidence can ratepayers, who after all are funding it against their will, have in the cost estimates?

**Tenth, what is the strategic context?** Where is the evidence to show that this project is part of a structured product development and marketing strategy rather than just an opportunistic stand-alone product initiative. For example, where is the plan to enable passengers arriving at the new cruise terminal, which could be up to 10,000 a day, to visit the attraction in a time and cost-effective manner?

1. **Alleged ‘Benefits’ and Dis-Benefits**

The cost benefit analysis only compares the project with the ’do-nothing’ option. The relative costs and benefits of alternative initiatives are not considered. Moreover*, “it is noted that the values included here are costs and benefits to the community of Brisbane collectively, rather than to an operator or organisation”*.Surely, if has not been demonstrated that the net benefits to the operator are positive insofar as the attraction is operationally sustainable what is the justification to proceed when the collective benefits to the community are likely to be short-lived?

Given that the claim that the attraction is “*a world class experience”* that is *“not available elsewhere”* cannot be substantiated, the claim that “*Brisbane would be able to capture tourism expenditure that currently leaks to other areas in SEQ and further afield”* is highly questionable.

While true that there will be “*economic value from people attending the attraction and spending at the gift shop”,* the value of this benefit cannot be quantified without an estimate of the quantum of patrons using the gift shop and their average spend. Only then can the economic benefit be measured against the cost of the project.

How has it been determined that the physical activity of sitting in a sling on a zipline or walking along a cable way in a harness will *“avoid government health costs”* due to the increased physical activity involved. This is simply grasping at straws. Riding on a zipline probably involves less physical demands than simply going for a bushwalk on Mt Coot-tha and is equally likely to increase government health cost as a result of accidents.

The benefit from *“increased demand for tourist accommodation”* has already been shown to be questionable in Section 2, Criterion Six above.

The fact that the cost benefit analysis states that one of the benefits of the project is an *“additional recreational attraction in the Brisbane City area”* simply verifies that the project is not about ecological and cultural interpretation but more an adventure park located on valuable public open space.

Describing the project as providing an *“additional excursion opportunity for schools”* simply portrays it as a fun-day-out destination rather than an educational opportunity.

The whole gamut of claimed social and cultural benefits is simply a feelgood list without any substantiation. *“Retaining escape tourism within Brisbane City Council area”* adds to the confused message about what it is – how can it be an escape destination when the opening estimated attendance amounts to an average of nearly a thousand visitors a day?

How will *“further opportunities for indigenous employment and returned service veterans”* be effected? It is not a labour-intensive operation.

Will the operator be willing to provide *“further training opportunities in the hospitality and tour guiding areas”*?Labour is the biggest single operating cost of this type of operation so the operator will be keen to minimise this cost.

The benefit of “i*ncreasing awareness of indigenous history”* can be achieved through less costly means.

Rather than *“increasing attendance / awareness of botanic gardens and Mt Coot-tha area*” the project is likely to be a disbenefit in deterring visits by people who enjoy the tranquillity of the gardens which will be disturbed by the noise of the pulleys on the cables overhead to say nothing of the disturbance resulting from a constant flow of noisy low-flying objects overhead.

The unsubstantiated *“conservative estimate”* on p11 of the Cost Benefit Analysis that *“the increased amenity associated with the Mt Coot-tha eco-tourism attraction*” will attract *“30 percent of the local catchment area* (unquantified) *- or around 11,000 to 15,000 people (to) spend an additional hour in the precinct”*. is risible. The odds are that, given the intrusive nature of the Zipline on the tranquillity of the Botanic Gardens, fewer people will visit the Gardens and stay for a shorter time, leaving when the Zipline becomes busy.

 Despite the claimed *“improvements to the safety of the area given transport infrastructure”* improvements these will be offset by the increase in the number of visitors and vehicles attracted to the area.

Finally, where is the research to support the claim that riding in a sling on a zipline or walking on a cableway in a harness promotes tangible *“improved quality of life through increased physical activity*”?

1. **Conclusion**

Having undertaken the attendance and revenue projections for World Expo 88 and numerous other government-initiated tourism attractions in Queensland as well as market demand estimates for the prospectuses of a number of tourism IPOs, it is my opinion that the board of directors of a public corporation would not approve a project based on the flimsy information and analysis contained in the development application for this project, and neither should the Brisbane City Council.

**The application should be refused.**

**Dr Richard Bramley**

13-12-2018

1. Bramley, R. A. C. (2003). Why Government-Initiated and Funded Tourism Enterprises Fail: A critical evaluation of the roles of government in the development of visitor attractions in Queensland, Australia (PhD dissertation). School of Tourism and Hospitality Management. Lismore, Southern Cross University [↑](#endnote-ref-1)
2. Bramley, R. (2000) Cultural tourism; Will it work for you? The use of cultural resources as a catalyst for regional tourism development. Brisbane, CRC Tourism [↑](#endnote-ref-2)