

6 December 2018

Lord Mayor Quirk  
Brisbane City Council  
GPO Box 2287  
Brisbane Qld 4001

To whom it may concern,

**Re: Submission regarding the proposed Mt Coot-tha Zipline (A005011420)**

Thank you for the opportunity to make a submission regarding the proposed Mt Coot-tha Zipline.

The National Trust of Australia (Queensland) is the peak body for the protection, conservation and celebration of environmental, built and cultural heritage in Queensland. It is a member-based, not-for-profit charity that represents the interests of more than 16,000 members across the state. The National Trust of Australia (Queensland) has been advising, supporting and representing its members since 1963.

We do not support the development application as it stands due to unacceptable impact on the heritage significance of the Queensland Heritage Register listed Mt Coot-tha area. This letter explains our position in more detail.

**Access to documentation and submission period**

Please note that we encountered extreme difficulties accessing up-to-date development application documents on the Brisbane City Council's pdonline system. We acknowledge that while an alternate email address to make submissions was provided, we were hindered by the pdonline system shutting down as we were unable to access other group's submissions, essential development application documents and the letter of advice from SARA. We did contact BCC and request these documents to be emailed to us however we were informed that the only way to access them was via pdonline – which was inaccessible.

Lack of access to crucial documents combined with the extremely short public submissions period (14 days) and the Christmas period has greatly hampered the ability of submitters and this should be recognised by Brisbane City Council with an extension of the submission period and an alternative method of digitally accessing the appropriate documentation.

**Declaration of Interest**

We acknowledge a professional relationship with TreeTops Challenge, an external provider of the TreeTop Challenge at the National Trust property Currumbin Wildlife Sanctuary. TreeTops Challenge was an unsuccessful tenderer for the Mt Coot-tha Zipline.

**Heritage Significance of Mt Coot-tha Look Out and Kiosk, and Mt Coot-tha Forest**

National Trust of Australia (Queensland) is dedicated to the protection, conservation and celebration of environmental, built and cultural heritage.

The proposed development will affect two places listed on the Queensland Heritage Register – the Mt Coot-tha Look Out and the Mt Coot-tha Forest. The following table outlines the significance of these two places.

Mt Coot-tha Lookout and Kiosk	Mt Coot-tha Forest
<p><b>Criterion A</b>  <i>The place is important in demonstrating the evolution or pattern of Queensland's history.</i></p> <p>The Mt Coot-tha Lookout and Kiosk site has been recognised as the <b>best vantage point from which to view the surrounding area</b> since the first recorded European ascent in 1828. Since this time, the growing popularity of visiting the summit has <b>reflected the emergence of leisure and recreation time</b> for the general populace, and the advent and popularity of the motor car.</p>	<p><b>Criterion A</b>  <i>The place is important in demonstrating the evolution or pattern of Queensland's history.</i></p> <p>Mount Coot-tha Forest is an early example of the importance that the Queensland public placed upon recreational, scenic and environmental values. It has been used as a vantage point since the first recorded European ascent of Mount Coot-tha in 1828. Since then, the growing popularity of visiting the summit has reflected the emergence of leisure and recreation time for the general populace, and the advent and popularity of the motor car. The area has been continually used and enjoyed by the public since the early development of Brisbane. It is also important for demonstrating a range of different land uses such as a reference point for surveying, timber reserve, gold mining and military activities that are representative of Queensland history while retaining its original values.</p>
<p><b>Criterion D</b>  <i>The place is important in demonstrating the principal characteristics of a particular class of cultural places.</i></p> <p>The Kiosk is important as a building which has evolved to meet the changing requirements of use, but <b>has retained the integrity and character of the original structure</b>. The evolution of the Kiosk is displayed in its cohesive and legible form, with the c.1918 structure forming the basis of the present building.</p> <p>The Lookout is representative of a 1950s interpretation of the functionalist idiom.</p>	<p><b>Criterion B</b>  <i>The place demonstrates rare, uncommon or endangered aspects of Queensland's cultural heritage.</i></p> <p>The remnants of gold mining in Mount Coot-tha Forest represents a now uncommon aspect of Queensland's history. While gold prospecting was once a common way of life in Queensland, the proximity of gold prospecting activity so close to Brisbane is uncommon. These remnants are the only physical evidence left of the attempts to establish a fledging gold industry at Mount Coot-tha.</p>
<p><b>Criterion E</b>  <i>The place is important because of its aesthetic significance.</i></p> <p>Both structures are representative of the high quality of civic architecture produced by the Brisbane City Council Works Department and of the City Architect.</p>	<p><b>Criterion C</b>  <i>The place has potential to yield information that will contribute to an understanding of Queensland's history.</i></p> <p>The remnants of gold mining activity have the potential to yield information about the nature and scope of the activities that took place in Mount Coot-tha Forest which will contribute to an understanding of how the area was used over time.</p>

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Mt Coot-tha Lookout and Kiosk	Mt Coot-tha Forest
	<p><b>Criterion E</b>  <i>The place is important because of its aesthetic significance.</i></p> <p>Mount Coot-tha Forest is important because of its aesthetic significance as a prominent scenic and landmark element in the cityscape and affords spectacular views in all directions, as well as views to the mountain, particularly from the city.</p>
	<p><b>Criterion G</b>  <i>The place has a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.</i></p> <p>The recreational, scenic and environmental attributes of Mount Coot-tha Forest have been valued by the people of Brisbane since the early days of European settlement in Brisbane. The use of the area for leisure activities was strengthened with the legislation of the Saturday half day holiday in 1900 which heralded the beginning of the traditional weekend. The picnic areas and walking tracks are evidence of the continuity of recreational activities in Mount Coot-tha Forest since the late 1800s to the present and the area is popular with different recreational groups including scouts, bushwalkers, runners and mountain bike riders.</p>
	<p><b>Criterion H</b>  <i>The place has a special association with the life or work of a particular person, group or organisation of importance in Queensland's history.</i></p> <p>Mount Coot-tha Forest has strong association with former Queensland Premiers Sir Samuel Griffith, who was a trustee, and Sir William Jolly who, through his administration in the mid 1920s, was instrumental in maintaining and expanding Mount Coot-tha Forest and played an important role in ensuring the area was preserved for the enjoyment of the Queensland public into the future.</p>

### Submission Overview

Our submission relates only to the proposed zipline's impact on the cultural heritage significance of the Mt Coot-tha area. This should not be taken as meaning that there are no other potential impacts associated with the project.



The National Trust is supportive of developing initiatives that provide funds for the conservation of natural areas which increase awareness of the importance of conservation and facilitate greater public access to places of heritage significance.

However, the proposed Zipline represents a project that has been designed from a commercial perspective rather than conservation perspective. It will limit the amount of Mt Coot-tha Forest that is available to the non-paying public and its scale does not support the traditional, passive recreational of the Forest and will have an adverse visual impact on views to and from the Mountain.

The amount of tree clearing to support the large nature of the Zipline facility is unacceptable from a heritage perspective.

Closing access to a public place for non-fee paying visitors is unacceptable and will not support greater public awareness of the heritage significance of the place.

The scale of the facility, in particular the 6 large ziplines, will adversely impact the significance of Mt Coot-tha and will not support heritage aspects of the Brisbane City Plan 2014 Heritage Overlay Code and in particular, the Mt Coot-tha Neighbourhood Plan Code which requires “any development and design is responsive to the scenic landscape values afforded from this site.”

The proposal as it stands, including the 80metre wide Zipline corridor, extensive clearing, noisy activity and vegetation trimming is not responsive to these codes or to the heritage significance of the heritage listed Mt Coot-tha Forest.

### **Heritage Impact Statement**

Whilst we do not agree with all its findings, we acknowledge that the Heritage Impact Statement undertakes a robust assessment with regards to built heritage values and overall values of the place. However, we find that the Heritage Impact Statement is lacking in regards to aesthetic significance of views to and from Mt Coot-tha and underplays the visual impact of the facility.

We also find that the Heritage Impact Statement is lacking with regards to potential indigenous heritage values. A separate indigenous heritage assessment should be undertaken which follows the “Ask First” principles of robust consultation; acknowledges that that indigenous heritage is about more than simply ‘stones and bones’ (archaeological places) and includes the importance of living heritage, cultural practices and spiritual associations; and carries out a heritage assessment of tangible and intangible (living) indigenous heritage values.

Yours sincerely,



Jonathan Fisher  
Chief Executive Officer  
National Trust of Australia (Queensland)



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