



The Department recommends that you contact the Department of Conservation Office closest to where the activity is proposed to discuss the application prior to completing the application forms. Please provide all information requested in as much detail as possible. Applicants will be advised if further information is required before this application can be processed by the Department.

This form is to be used when the proposed activity is the building or use of any private or commercial facility or structure on public conservation land managed by the Department of Conservation. Examples may include lease of land to erect an information centre; authorisation to erect a weather station; or construct or lease a private/commercial campground or lodge. This form is to be completed in conjunction with either Applicant Information Form 1a (longer term concession) or Applicant Information Form 1b (one-off concession) as appropriate.

Please complete this application form, attach Form 1a or Form 1b, and any other applicable forms and information and send to [permissions@doc.govt.nz](mailto:permissions@doc.govt.nz). The Department will process the application and issue a concession if it is satisfied that the application meets all the requirements for granting a concession under the Conservation Act 1987.

If you require extra space for answering please attach and label according to the relevant section.

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## A. Description of Activity

Please describe the proposed activity in detail – where the site is located, please use NZTM GPS coordinates where possible, what you intend to use the building for, whether you intend to make any changes to the infrastructure.

Please include the name and status of the public conservation land, the size of the area for which you are applying and why this area has been chosen.

If necessary, attach further information including a map, a detailed site plan and drawings of proposal and label Attachment 3b:A.

we are seeking to establish a guided zipline operation in the 12-mile delta

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## B. Alternative sites considered

If your application is to **build, extend or add** to any permanent or temporary structures or facilities on public conservation land, please provide the following details:

- Could this structure or facility be reasonably located outside public conservation land? Provide details of other sites/areas considered.
- Could any potential adverse effects be significantly less (and/or different) in another conservation area or another part of the conservation area to which the application relates? Give details/reasons

We have assessed alternative locations but have been unable to identify any private or public land that offers the same combination of attributes as the Twelve Mile Delta Recreation Reserve. The features that make this site uniquely suitable include:

- A high-quality natural setting, characterised by regenerating beech forest that provides both an immersive visitor experience and a meaningful context for ecological restoration.
- Proximity to Queenstown, enabling convenient customer access while reducing transport-related emissions and operational inefficiencies.
- The ability to integrate active conservation work with interpretation, allowing visitors to engage with a genuine conservation land narrative.
- The opportunity to interpret an important element of Queenstown's heritage, particularly the area's gold-mining history, which is not well represented elsewhere and for which the site provides an authentic and compelling backdrop.

The only existing zipline operations in the district are:

- Queenstown Hill – an exotic pine forest setting, which does not provide the conservation character or educational opportunities sought for this product.
- Glenorchy – located further from Queenstown, requiring a long drive that significantly increases operational challenges and makes the commercial model more difficult.

By contrast, the Twelve Mile Delta site is a Recreation Reserve under the Reserves Act 1977. Its statutory purpose specifically provides for recreation activities of this type, provided that natural and amenity values are protected. The attached Assessment of Effects' sets out in detail how potential impacts will be managed, mitigated, and offset, ensuring that the activity is both appropriate for this location and consistent with statutory outcomes.

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## C. Larger area

Is the size of the area you are applying for **larger** than the structure/facility

**YES / NO**

If **yes**, please detail the size difference in the box below, and answer the following 3 questions, if **no** please go on to the next section:

We are seeking a concession in the form of:

- Lease areas (exclusive use):  
A lease over the specific land occupied by the zipline infrastructure. This includes 8 platform structures, each with a footprint of less than 25 m<sup>2</sup>. These areas are required for our exclusive use to ensure safety and operational control of the structures.
- Licence areas (non-exclusive use):  
A licence to guide participants along the public track and on short connecting paths between zipline stations, some of which already exist and others which may need to be formed.

This approach—combining leases for fixed infrastructure with licences for guiding—mirrors the concession model already in place at Rotorua Canopy Tours. That framework has DOC’s support and has proven to work effectively, balancing operational needs with public access.

#### Summary

In short, the answer is both *yes and no*. Yes, we are seeking a licence over track sections that extend beyond the structures, but no, we are not seeking exclusive use of those areas. Exclusive use is sought only for the leased platform areas where the infrastructure itself is located.

Is this necessary for safety or security purposes? – **exclusivity over lease area**

**YES / NO**

Is this necessary as an integral part of the activity? – **both lease and license areas are integral**

**YES / NO**

Is this essential to carrying on the activity? – **both lease and license areas are essential**

**YES / NO**

If the answer to any of the above is yes, please provide details and attach supporting evidence if necessary and label Attachment 3b:C.

A lease is required over the land directly occupied by the zipline platforms. These areas must be under our exclusive control to ensure safety for participants and the public, provide security for the infrastructure, and protect the integrity of the product.

A licence is required over the tracks to move customers between ziplines and for access and exit. This includes short connector paths and limited sections of the existing public track. The licence is non-exclusive, meaning public access is not precluded, but it enables us to lawfully guide participants through these areas as part of the activity.

This lease/licence framework mirrors the concession structure successfully operating at Rotorua Canopy Tours, which has DOC’s support and has proven effective in balancing operational safety and public access.

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## D. Exclusive possession

Do you believe you need **exclusive possession** of the public conservation land on which your structure/building is located, ie no one else can use the land during your use of it?

**YES / NO**

*(Exclusive occupation requires a lease which requires public notification of the application)*

If **yes**, please answer the following 3 questions, if no please go to the next section:

Is exclusive possession necessary to protect public safety?

**YES / NO**

Is exclusive possession necessary to protect physical security of the activity?

**YES / NO**

Is exclusive possession necessary for the competent operation of the activity?

**YES / NO**

If the answer to any of the above is yes, please provide details and attach supporting evidence if necessary and label Attachment 3b:D.

Exclusive possession is required for the platform structures (leased areas) but not the tracks (licensed areas).

It is essential that we retain the ability to lock out the ziplines so that no other parties can access or attempt to use them. This is necessary for several reasons:

- Integrity of structures and cables: If third parties interfere with or tamper with the equipment, we cannot verify that it remains safe for use by our customers. Exclusive control ensures we can guarantee the structural integrity of the system.
- Unsupervised use: Ziplines are not safe for untrained or unsupervised use. Preventing third-party access ensures that only trained guides and supervised participants operate on the system.
- PCBU responsibilities: As a PCBU (Person Conducting a Business or Undertaking) under the Health and Safety at Work Act 2015, our responsibilities extend to third parties. The only practical way to meet these obligations is by ensuring we can secure the ziplines and prevent unauthorised use.

This approach is already applied successfully at Rotorua Canopy Tours, with DOC's support. It provides certainty over safety, integrity, and compliance with statutory health and safety responsibilities while preserving public access to all non-exclusive licensed areas.

## E. Technical Specifications (for telecommunications sites only)

### Frequencies on which the equipment is to operate

n/a

### Power to be used (transmitter output)

n/a

### Polarisation of the signal

n/a

### Type of antennae

n/a

### The likely portion of a 24 hour period that transmitting will occur

n/a

### Heaviest period of use

n/a

## F. Term

Please detail the length of the term sought (i.e. number of years or months) and why.

*Note: An application for a concession for a period over 10 years must be publicly notified, an application for a concession up to 10 years will not be publicly notified unless the adverse effects of the activity are such that it is required, or if an exclusive interest in the land is required.*

We wish to apply for a 30-year concession term.

The proposed activity requires a significant upfront capital investment, estimated in the order of [REDACTED]. This investment includes site-specific infrastructure, engineering and construction costs, safety systems, as well as brand development, marketing, and establishment costs associated with launching a new operation. Much of this investment is fixed in nature, cannot be relocated, and can only be recovered over a long operating period.

As a start-up operation, the business will also require time to establish its market presence, build brand recognition, recruit and train staff, and reach operational maturity. Experience in the adventure tourism sector indicates that new operations of this nature commonly require between five and ten years to reach a break-even position. During this period there is ongoing cash burn and commercial risk, which is borne entirely by the applicant, with no guarantee of success.

A 30-year concession term is therefore sought to provide a realistic opportunity to recover the initial investment, manage commercial risk, and ultimately generate a reasonable return. A materially shorter term would constrain the ability to justify the scale of investment required and would undermine the long-term viability of the proposal.

In addition, the applicant proposes to establish and fund a long-term conservation programme at Twelve Mile Delta, modelled on the programme operated at Rotorua Canopy Tours. At Rotorua, the applicant has funded conservation work, including pest control, monitoring, and ecological restoration. That programme has taken approximately 12 years to move the forest from a degraded condition to one of high ecological quality.

Similar timeframes are anticipated at Twelve Mile Delta. Ecological restoration and pest management require sustained effort over long periods, and once improvements are achieved, they must be maintained to avoid regression. A 30-year term provides the certainty necessary to invest in these outcomes, embed conservation funding into the business model, and ensure that ecological gains are durable and financially sustainable over the long term.

For these reasons, a 30-year concession term is sought as being proportionate to the level of investment, risk, and conservation and public benefits proposed, and consistent with DOC's approach to infrastructure-based recreation concessions with long-term outcomes.

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## G. Bulk fuel storage

Under the Hazardous Substances and New Organisms Act 1996 (HSNO Act) 'Bulk fuel storage' is considered to be any single container, stationary or mobile, used or unused, that has a capacity in excess of 250 litres of Class 3 fuel types. This includes petrol, diesel, aviation gasoline, kerosene and Jet A1. For more information on Hazardous Substances, go to:

<http://www.business.govt.nz/worksafe/information-guidance/legal-framework/hsno-act-1996>

Do you intend to store fuel in bulk on the land as part of the activity?

**YES / NO**

If you have answered yes, then please provide full details of how and where you intend to store the fuel, and label any attachments including plans, maps and/or photographs as Attachment 3b:G. If your concession application is approved you will be required to provide a copy of your HSNO compliance certification to the Department before you begin the activity.

## H. Environmental Impact Assessment

This section is one of the most important factors that will determine the Department's decision on the application. Please answer in detail.

In column 1 please list all the locations of your proposal, please use NZTM GPS coordinates where possible. In column 2 list any special features of the environment or the recreation values of that area. Then in column 3 list any effects (positive or adverse) that your activity may have on the values or features in column 2. In column 4 list the ways you intend to mitigate, remedy or avoid any adverse effects noted in column 3. Please add extra information or supporting evidence as necessary and label Attachment 3b:H.

Refer to Steps 1 and 2 in your Guide to Environmental Impact Assessment to help you fill in this section.

Location on public conservation land	Special feature or value	Potential effects of your activity on the feature or value (positive or adverse)	Methods to remedy, mitigate or avoid any adverse effects identified
<i>EG: Tararua Forest Park</i>	<i>Northern rata - threatened species</i>	<i>Damage to the plants by construction</i>	<i>Brief construction and maintenance staff of the location and importance of the species; clearly tape off areas with the species to avoid damage</i>
Our assessment of effects is set out in the attached papers:			
Supplementary information in support of concession application			
Ecological Assessment of Effects – Restore NZ			
Archaeological Survey Data - Kopuwai			

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## I. Other

Is there any further information you wish to supply in support of your application? Please attach if necessary and label Attachment 3a:l.

This application is supported by additional documentation, submitted to provide clarity on the proposed activity and its effects:

- Two other DOC forms – 3b; and application for land based activity
- Maps identifying the location of the proposed zipline alignment, including platform positions, access points, and track connections.
- Planning Opinion prepared by John Edmond & Associates, which analyses the applicability of the Resource Management Act 1991 and concludes no requirement for resource consent.
- Construction Drawings showing plans of zipline structures, platforms and anchors.
- Supplementary Information in Support of Application
- Heritage – Archaeological Survey Data - Kopuwai
- Ecological Assessment – Restore NZ

These documents are provided alongside this application to assist DOC in understanding the proposal, the planning context, and the type of infrastructure proposed.