

# Supplementary Information in Support of 12-mile Zipline Application

## 1) Proposal Overview

**Proposal:** Guided zipline activity (launch and landing platforms, cables, and guide-led operations) within the Twelve Mile Delta Recreation Reserve and the Mt Crichton Scenic Reserve, Queenstown.

**Applicant:** The applicant is RCT Group Limited, the parent company of Rotorua Canopy Tours Limited, a multi-award-winning zipline operation based in Rotorua. Rotorua Canopy Tours is recognised nationally and internationally for both its visitor experience and its successful conservation programme.

RCT Group Limited also owns Million Dollar Cruise in Queenstown.

Two of the company's directors are long-term Queenstown residents, with a strong commitment to the local community and environment.

Some of the RCT Group Limited shareholders are also shareholders and Directors in other leading adventure and guiding businesses on the conservation estate, including Canyon Explorers (Queenstown), Fox Glacier Guiding (Fox Glacier), and Mt Cook Glacier Guiding (Aoraki/Mt Cook).

Collectively, their experience reflects a deep understanding of operating in sensitive environments, managing safety and conservation responsibilities, and maintaining long-standing working relationships with the Department of Conservation.

### Activity Description

- **Transport and Access:** Customers will be transported from Queenstown in up to 15-seater Toyota Hiace/Ford Transit-type vans (max capacity: 13 customers, 2 guides). Customers will be dropped at the top car park (marked as "Start" on the attached QT Zip course map).
- **Guide Operations:** One guide will remain with the group, while the second guide relocates the vehicle to the Twelve Mile Delta campsite car park (marked as "end" on the attached map). The second guide will run back up the track to re-join the group.
- **Entry and walk-in:** The group walks approximately 250 metres along the public track before entering the bush, following the dotted alignment shown on the attached map leading to Zip 1.
- **Zipline route:** Zip 1 is ~50 metres long. A short walking track then leads to Zip 2, which is ~30 metres long and crosses the river to the true right bank. From there, an ~85-metre walk takes customers to Zip 3, which is ~80 metres long. Following Zip 3, participants undertake a short scenic and educational diversion through an historic water race, allowing interpretation of gold-mining features such as tailings and sluiced gullies. This route leads to Zip 4, which is ~300 metres long.
- **Exit and collection:** Zip 4 terminates on a bare gravel, sparsely vegetated, alluvial deposit. From here, customers rejoin the Bob's Cove track and walk back to the waiting van at the location marked "End" on the map.

## **Land Status and Administration**

The proposed activity is located across two categories of public conservation land.

- The customer drop-off at the Mt Crichton car park, the walk-in to Zip 1, Zip 1, the link track to Zip 2, and the launch of Zip 2 - are all located within the Mt Crichton Scenic Reserve.
- The remainder of the activity, including the Zip 2 receive platform, Zips 3 and 4, and the walk-out route, is located within the Twelve Mile Delta Recreation Reserve.
- The boundary of the reserves is marked on the map

Both reserves are administered by the Department of Conservation (DOC).

## **2) Statutory and policy framework (and how we fit)**

### **A. Reserves Act 1977 – Recreation Reserve purpose (s17)**

s 17(1): Recreation reserves are held *“for the purpose of providing areas for the recreation and sporting activities and the physical welfare and enjoyment of the public, and for protecting the natural environment and beauty, with an emphasis on retaining open space and outdoor recreation.”*

s 17(2)(a): *“The public shall have freedom of entry and access to the reserve,”* subject to reasonable restrictions and bylaws for protection and control.

It is therefore submitted:

- Ziplining is appropriate recreation: The Act’s core purpose is provision for *“recreation and sporting activities”* and the *“physical welfare and enjoyment of the public.”* A guided zipline fits squarely within that recreation purpose.
- Small physical footprint / open space maintained: s 17(1) places emphasis on retention of open spaces; our design’s small footprint and canopy-level siting align with that emphasis.
- Avoiding sensitive vegetation / protecting values: s 17(1) also requires protection of the natural environment and beauty — our avoidance of sensitive vegetation and non-intrusive construction meets this obligation.
- Enhancing visitor enjoyment in a managed way: The statute’s reference to *“physical welfare and enjoyment of the public”* supports our guided, safety-controlled experience that complements existing walking use.
- Maintaining public access: s 17(2)(a) confirms public freedom of entry and access. Our operation only uses existing tracks briefly and does not displace general users.
- Contributing to conservation awareness: In addition to recreation, our operation will actively enhance public appreciation of conservation values. Through guided commentary and product delivery, visitors will be educated on local biodiversity, ecological restoration, and carbon sequestration. This aligns with the Act’s emphasis on protecting the natural environment and beauty while fostering public enjoyment and understanding of those values.

### **Conclusion:**

Given the purposes of s 17(1), reinforced by the access principle in s 17(2)(a), our activity is consistent with the statutory framework for Recreation Reserves when coupled with our

small footprint, vegetation protection, managed operations, and the added benefit of conservation education for visitors.

## **B. Reserves Act 1977 – Scenic Reserve purpose (s19)**

Section 19(1)(a) of the Reserves Act 1977 provides that Scenic Reserves are held “for the purpose of protecting and preserving, in perpetuity, for their intrinsic worth and for the benefit, enjoyment, and use of the public, such qualities of scenic interest or beauty or natural features or landscape that their protection and preservation are desirable in the public interest.”

Unlike Recreation Reserves, the primary statutory focus for Scenic Reserves is the protection of scenic and landscape values, with public use provided for only where it does not compromise those values.

### **Application to this proposal**

A limited portion of the proposed activity is located within the Mt Crichton Scenic Reserve, specifically:

- the customer drop-off location,
- Zip 1,
- the commencement of Zip 2, and
- the tracks that link these elements.

The remainder of the activity is located within the Twelve Mile Delta Recreation Reserve.

It is therefore submitted:

- **Protection of scenic and landscape values:**  
The drop-off area, Zip 1, and the start of Zip 2 have been deliberately sited away from prominent viewpoints and public track corridors. These elements are not visible from the public walking track and are screened by existing topography and regenerating vegetation. As a result, the intrinsic scenic qualities of the reserve, as experienced by the public, are maintained.
- **Visual effects are low and localised:**  
Zipline infrastructure within the Scenic Reserve is modest in scale, uses natural-toned materials, and avoids ridgelines or skyline exposure. Platforms and cables are set back from the track and visually absorbed into the forest backdrop. There is no adverse effect on the wider landscape character or scenic coherence of the reserve.
- **Public enjoyment preserved:**  
Public access and enjoyment of the Scenic Reserve remain unchanged. The activity does not obstruct tracks, alter viewpoints, or diminish the public’s ability to experience the reserve’s scenic and natural values.
- **Contribution to protection of natural features:**  
The applicant’s commitment to conservation work will support the ongoing protection and enhancement of the reserve’s natural features and forest condition. This approach is informed by the applicant’s experience delivering a comparable conservation programme within Dansey’s Scenic Reserve in Rotorua, where

sustained pest control and restoration work has measurably improved forest health and ecological resilience.

- **Consistency with Scenic Reserve purpose:**  
Because the activity components within the Scenic Reserve are largely screened from public view, do not detract from scenic or landscape values, and are supported by active conservation management that enhances the condition of natural features, the proposal is consistent with the purpose of Scenic Reserves under section 19 of the Reserves Act 1977.

**Conclusion:**

The limited extent of the activity within the Mt Crichton Scenic Reserve, combined with careful siting, visual screening, and low-profile design, ensures that scenic and landscape values are protected and preserved. The proposal therefore meets the statutory tests for activities on Scenic Reserve land.

**Overall conclusion:**

When assessed against both:

- the recreation-focused purposes of the Twelve Mile Delta Recreation Reserve, and
- the scenic protection purposes of the Mt Crichton Scenic Reserve,

the proposal is appropriately located, carefully designed, and managed to ensure that statutory purposes are upheld. Effects on scenic, natural, and recreational values are avoided or mitigated, and public access and enjoyment are maintained.

### **C. Conservation General Policy (CGP) 2005**

**Relevance**

The CGP provides overarching policy direction for all concessions on conservation land outside National Parks. Under the Conservation Act, DOC is required to “give effect to” the CGP when making concession decisions.

**Key Policy Themes**

The most relevant principles include:

- Protection of natural and historic values, with avoidance or minimisation of adverse effects.
- Provision for recreation opportunities where consistent with the purposes of the land and the outcomes set for the Place.
- Management of cumulative effects, visitor safety, and potential conflicts between users.
- Fostering public appreciation and understanding of natural and historic heritage.

It is therefore submitted:

- Protecting values: Our design avoids sensitive vegetation, uses a minimal footprint, and incorporates protocols for heritage protection and ecological monitoring. This ensures natural and historic values are safeguarded in accordance with CGP principles.

- **Appropriate recreation provision:** The CGP supports recreation activities where they align with statutory purposes. Our guided zipline operation offers a low-impact outdoor activity consistent with the recreation purpose of Twelve Mile Delta.
- **Managing effects and conflicts:** We have incorporated measures to control cumulative effects (e.g., limiting group sizes and trip frequency and spacing), ensure visitor safety (via a Safety Management System), and minimise conflict with other users (through shuttle access, limited use of tracks, and noise controls).
- **Education and conservation awareness:** Through guided commentary and product delivery, visitors will be introduced to the area's biodiversity, ecological restoration work, heritage values and carbon sequestration initiatives. This aligns with the CGP's emphasis on fostering public understanding of natural and historic heritage conservation values, ensuring the concession contributes positively to DOC's wider goals.
- **Protecting scenic values where the activity overlaps a Scenic Reserve:** The CGP requires particular care where activities occur in areas with high scenic values. The limited components of the proposal within the Mt Crichton Scenic Reserve (customer drop-off, Zip 1 and the start of Zip 2) have been deliberately sited away from public viewpoints and walking tracks. These elements are not visible from the track network and are screened by vegetation and landform. As a result, scenic and landscape values are protected in accordance with CGP policy.

### **Conclusion**

With the mitigation and operational conditions proposed, our activity accords with the CGP 2005, respecting conservation values while enabling managed recreation and contributing to public appreciation of natural heritage.

## **C. Otago Conservation Management Strategy (CMS) – Western Lakes & Mountains / Ngā Puna Wai Karikari a Rākaihautū Place**

### **Relevance**

The Otago Conservation Management Strategy (CMS) sets desired outcomes and activity policies for the Western Lakes & Mountains / Ngā Puna Wai Karikari a Rākaihautū Place. This includes the Twelve Mile, Bob's Cove, and Mt Crichton area, with both Recreation Reserves and Scenic Reserves identified in the Place inventory. DOC must give effect to these outcomes when considering concessions.

### **Desired Outcomes for this Place**

- High-quality, nature-based recreation opportunities are provided.
- Natural character, ecological values, and landscape integrity are protected.
- Recreation is managed to ensure compatibility with conservation outcomes and to avoid crowding or conflict.
- Visitors are encouraged to understand and appreciate conservation values.

It is therefore submitted:

- Provision of nature-based recreation: The CMS encourages high-quality, outdoor recreation in this Place. Our guided zipline operation delivers a low-impact, nature-based activity that complements the walking and canyoning already available at Twelve Mile Delta and Bob’s Cove.
- Protection of natural and landscape values: By keeping a small infrastructure footprint, using natural-toned materials, and avoiding sensitive vegetation, our proposal aligns with CMS requirements to maintain ecological values and natural character.
- Managing recreation demand and conflicts: The CMS recognises the need to manage high visitor use in order to protect conservation outcomes. Our model of pre-booked, guided trips with capped group sizes and adequate spacing between groups, ensures visitor flows are controlled, minimising interaction with other track users and avoiding crowding.
- Education and conservation awareness: The proposal also advances CMS outcomes by building public understanding of conservation. Through guided commentary, visitors will be educated about biodiversity, ecological restoration, and carbon sequestration. This strengthens appreciation of the area’s natural values, linking recreation directly to conservation outcomes.
- Consistency with Scenic Reserve outcomes: Where the activity overlaps the Mt Crichton Scenic Reserve, the proposal has been designed to ensure scenic and landscape values are not compromised. The drop-off location, Zip 1, and the commencement of Zip 2 are located away from prominent viewpoints and are not visible from public tracks. Infrastructure is visually recessive and absorbed into the forest setting. Public access, views, and enjoyment of the Scenic Reserve are therefore maintained, consistent with CMS outcomes for scenic protection.

### **Conclusion**

The proposal is consistent with the CMS outcomes for this Place. It enhances recreation diversity in a managed and controlled way, protects natural, ecological, and scenic values, and contributes to public awareness of conservation and heritage values.

### **Overall statutory consistency**

When assessed holistically across the Recreation Reserve and Scenic Reserve components of the site, and against the CGP and CMS, the proposal is appropriately located and carefully designed. Recreation outcomes are delivered where they are anticipated by statute, scenic and landscape values are protected where required, and effects are avoided or mitigated through siting, screening, and operational controls.

### **D. Ngāi Tahu Claims Settlement Act 1998 – Statutory Acknowledgement (Whakatipu-wai-māori / Lake Wakatipu)**

#### **Relevance**

Under the Ngāi Tahu Claims Settlement Act 1998, the Crown acknowledges the particular cultural, spiritual, historical, and traditional association of Ngāi Tahu with Whakatipu-wai-

māori (Lake Wakatipu). The Department of Conservation is required to have regard to these statutory acknowledgements when considering concessions, and to consult with iwi where activities may affect recognised values.

### **Statutory Acknowledgement**

Schedule 50 of the Settlement Act records Ngāi Tahu's deep connection to Whakatipu-wai-māori, including associations with customary use, mahinga kai, whakapapa, and wāhi tapu. The acknowledgement requires decision-makers to recognise and provide for these values.

It is therefore submitted:

- Recognition of cultural values: We acknowledge Ngāi Tahu's statutory association with Whakatipu-wai-māori. Our proposal respects this connection by ensuring no works are undertaken in the lake, its margins, or waterways.
- Engagement with rūnaka: We will consult with the appropriate rūnaka to ensure their values and preferences are understood and provided for. We are open to developing cultural interpretation within the visitor experience, subject to rūnaka guidance. During pre-submission discussion, DOC advised that it wishes to manage the iwi consultation process, as part of its processing of our application.
- Operational safeguards: Our activity is limited to terrestrial areas of the Reserves, well separated from the lake edge. We will adopt an accidental discovery protocol for any taonga or wāhi tapu encountered during works.
- Positive opportunities: There is potential for cultural narratives, te reo Māori place names, and Ngāi Tahu stories of Whakatipu-wai-māori to be incorporated into visitor interpretation, strengthening cultural visibility and understanding.

### **Conclusion**

Through active engagement with Ngāi Tahu rūnaka, avoidance of impacts on the lake and its margins, and the incorporation of cultural values into visitor experiences, our activity will be consistent with the expectations of the Ngāi Tahu Claims Settlement Act 1998.

### **3) Setting and Existing Use**

Twelve Mile Delta is located on the northern shore of Lake Wakatipu, forming part of a highly valued recreation landscape. The reserves include:

- DOC-managed tracks, including the popular Twelve Mile Delta to Bob's Cove route.
- A DOC campground that attracts a mix of domestic and international visitors.
- High scenic values, with regenerating native forest, open lake-and-mountain vistas, and easy access from the Glenorchy-Queenstown Road.

Recreation demand is high during summer. Parking congestion does occur, although this is concentrated at the Bob's Cove car park. The car parks we intend to use (the Mt Crichton Loop track car park for drop-off and the campsite car park for collection) are not nearly as busy. The design of the operation, allowing for no customer transport and drop offs at the Mt Crichton car park, will ensure minimal contribution to congestion.

## 4) Activity description

### Infrastructure Elements

The proposal involves modestly scaled infrastructure designed to blend with the existing landscape and minimise disturbance:

- Platforms: Launch and landing platforms will typically be at or around ground level (less than 1m high). Where they need to be between 1-2m, they will be less than 5sqm. The larger, low (less than 1 metre) platforms will be capable of supporting up to 15 persons, fitted with stairs or ramps, handrails, and gated access as required to meet building regulations. The higher platforms (1-2 metres off the ground) will accommodate 1-2 persons, with the remaining customers gathering in waiting areas at ground level. None of the platforms will be buildings as defined by the Building Act 2004.
- Cables and Supports: Steel cables will be installed between engineered steel or timber poles. Support structures will typically use 220 mm CHS (circular hollow section) steel, or 300mm timber posts, anchored into rock or ground with engineered backstays.
- Ancillary Structures: 2 small PPE storage boxes (primarily for emergency equipment), will be discretely stored at strategic locations, for convenient access.

### Scale and Timing of Operations

- Operating period: The activity will operate year-round (12 months).
- Summer operations (8.00 am – 5.30 pm): Trips will depart on the hour, with additional half-hour departures during the peak summer period (late December - early January). This means up to 10 trips per day for most of the summer and up to 20 trips per day during the peak.
- Winter operations (10.00 am – 3.00 pm): Trips will depart on the hour, with additional half-hour departures during peak periods (school holidays). This means up to 6 trips per day for most of the winter and up to 11 trips per day during the peak.
- Group size: A maximum of 15 people per group (13 customers and 2 guides).
- Theoretical capacity: The maximum theoretical capacity is 260 customers per day in peak summer (130 per day for most of summer) and 143 customers per day in winter (78 per day for most of winter).
- Group spacing and experience: When half-hour departures are used, the result will be that groups are spaced at least two ziplines apart, meaning no more than two groups will be on the course at any one time. This spacing ensures a high-quality visitor experience and avoids a sense of crowding.
- Vehicle movements and parking: Each group will arrive in a single van. Customers will be dropped off at the Mt Crichton loop car park, and the vehicle will relocate to the pick-up point at the end of Zip 4. Each trip has a duration of approximately 1 hour and 20 minutes from drop off to pick up. During hourly departures, this results in 1–2 vehicles parked at the pick-up location at any one time. During peak summer periods with half-hour departures, this may increase to 3–4 vehicles.

### Access and Track Use

- Groups will use existing public tracks to enter and exit the key zipline locations.

- Short connecting trails will be required between ziplines. No new vehicle routes will be created.
- Construction of trails will remain on existing ground; gravel may be added where necessary for safety and erosion control. Some low impact timber-framed, gravel-infilled steps may be required to control erosion and improve user safety.

### **Course Construction Methods**

- Construction will prioritise hand tools and light, portable equipment.
- No earthworks will occur in waterways.
- Heavy machinery such as diggers will not be used to avoid permanent disturbance to flora and fauna.
- If concrete is required for footings, it will either be carried in dry and mixed by hand on site (small footings). A helicopter may be required for the larger footing at zip 4.
- Footings will generally consist of 600 mm holes filled with rammed earth or concrete base plates drilled/fixed into existing rock.

### **Safety and Operational Systems**

- The zipline course will use the KONG Coudou Pro ZAZA2 continuous belay system, which means customers are always attached to the system. This essentially eliminates the risk of falling from heights and providing the highest level of participant safety available in ziplining globally.
- All platforms and structures will comply with relevant building standards.
- The public will not be able to access the ziplines. This will be achieved by utilizing fenced sections, by ensuring the ziplines cables are out of reach from the ground and installing “lock out” systems where necessary.
- Exits and entries to/from the public Bob's Cove trail will be discrete and not obvious to walkers.
- Operations will be guided only and pre-booked and transport will be provided with no self-drive options available.
- A comprehensive Safety Management System will be in place, aligned with WorkSafe and the Adventure Activities Regulations.
- The applicant (RCT Group Limited) has extensive operational experience in managing zipline and adventure tourism activities in sensitive environments. Its 13 years of experience at Rotorua will be applied to the design and operation of this product and it will be supported by its external expert advisors - Dynamic Access.

## 5. Statement of Effects

### Noise

#### Effects

Track users are generally located 30–70 metres from the water’s edge, depending on the section of track. Zip 1 and the launch platform of Zip 2 are located on the true left bank and are typically 30–50 metres from the public track. All remaining ziplines—the Zip 2 landing platform and Zips 3 and 4—are located on the true right bank, placing track users generally 60–100 metres from the activity, with Twelve Mile Creek lying between the ziplines and the public track.

At these separation distances, zipline sound is reduced through distance alone and further attenuated by intervening vegetation and terrain. The creek provides a continuous natural background sound that masks any intermittent noise generated by the activity, resulting in clear acoustic separation between the ziplines and track users.

Measurements undertaken at Rotorua Canopy Tours, using the same zipline system proposed here, show that at distances of 50–70 metres—representative of typical separation distances at Twelve Mile Delta—zipline sound levels average in the low 40s dB(A). For example, at 70 metres from a 70-metre zipline, recorded levels ranged from 26–55 dB(A), with an average of 42 dB(A).

By comparison, measurements of Twelve Mile Creek taken on 29 August 2025 during moderate flow recorded ambient sound levels of 50–65 dB(A) at the upper track exit point and 55–75 dB(A) at the section of track closest to the river (approximately 30 metres away). This indicates that the creek generates a continuous natural sound environment that is generally higher than, and therefore masks, the brief and intermittent sound of the ziplines. While lower flows will result in reduced water noise, the creek will continue to provide a steady background sound.

For context, normal human conversation typically occurs at approximately 55–65 dB(A). At operational distances, average zipline noise levels are below conversational sound. Participants may occasionally call out during flight, producing short-lived increases in sound level; however, these are transient and moderated by distance, vegetation, and natural masking.

Overall, the zipline activity will generate brief and intermittent sound consistent with the existing recreation setting. Given the separation distances involved and the presence of continuous creek noise, the acoustic effects experienced by track users will be no more than minor.

#### Mitigation

The layout of the course places most ziplines on the true right bank, ensuring that distance and the creek itself provide effective acoustic buffering. Retained forest cover around the lines provides additional sound attenuation. Group sizes are capped and departures staggered to avoid cumulative noise effects, and guides will brief participants to limit unnecessary shouting, recognising that occasional calls may occur but will be masked by the creek’s background sound.

The activity is also located on a less frequented section of the Bob's Cove–Twelve Mile track, further reducing potential effects on other users. Any noise monitoring required by DOC can be undertaken, with results shared transparently to confirm ongoing compliance.

### **Conclusion**

With the combination of separation distance, continuous river noise, cross-river siting of most ziplines, and operational controls, zipline noise will be brief, intermittent, and effectively obscured within the natural sound environment. The proposal will therefore result in no more than minor acoustic effects on the reserve or the experience of track users.

## **Visual / Landscape**

### **Effects**

The Twelve Mile Delta is characterised by regenerating beech forest, steep terrain, and remnant gold-mining landscapes. Within this context, there is potential for skyline intrusion or visual dominance if infrastructure is poorly sited. Platforms, cables, and safety equipment may be partially visible from sections of the Bob's Cove Track and from the river corridor. Also, construction activities could temporarily alter the visual experience, with short-term disturbance from equipment and personnel.

### **Mitigation:**

- All platforms will be constructed below canopy height to blend with surrounding vegetation and will be located away from the public track
- Materials will be natural in tone (timber, low-gloss finishes, non-reflective cable).
- Skyline intrusion will be avoided/mitigated through careful site selection. Nothing will be visible from the state highway. Walkers may see a cable or customers zipping, on zip 4, as they walk along the Bob's Cove track just past the camp ground.
- Construction will be managed to minimise duration of disturbance.
- Any inadvertently disturbed areas will be promptly rehabilitated with eco-sourced native plantings.

## **Ecology**

This section is covered by the Restore NZ impact assessment, attached to this application.

## **Cultural / Ngāi Tahu Values**

### **Effects:**

The activity falls within the Whakatipu-wai-māori Statutory Acknowledgement area, recognising Ngāi Tahu's cultural, spiritual, and historical associations with the catchment. Potential adverse effects may arise if activities disregard cultural values, stories, or wāhi tapu/taonga. However, the activity also presents opportunities for interpretation and

education that align with Ngāi Tahu aspirations for cultural visibility on public conservation land.

**Mitigation:**

- Active consultation with Kāi Tahu rūnaka will occur before, during, and after establishment. DOC has advised that it wishes to conduct this consultation as part of its processing of this application.
- Cultural narratives relevant to the area will be incorporated into the visitor experience, with rūnaka input.
- Guides will undergo cultural awareness training.
- An accidental discovery protocol will be adopted, ensuring immediate cessation of works and engagement with rūnaka if cultural materials are uncovered.

## Recreation

**Effects:**

The Bob's Cove Track and Twelve Mile Delta area are popular for walking and running. The zipline operation could potentially create congestion at access points, in car parks, perceived crowding on trails, or conflicts if participants intersect with public tracks. Some visitors may perceive occasional noise or visual presence of infrastructure as detracting from the natural character of their experience.

Conversely, the activity offers a new recreation opportunity that complements the area's existing use and provides guided access with education components.

**Mitigation:**

- All customers will be transported in van shuttles. Groups will be dropped at the upper car park solely for access to the walking track and zipline entry point. Vans will then be relocated and parked at the Twelve Mile Delta campground car park, where parking capacity is not constrained. This approach eliminates additional public parking pressure, reduces traffic risk, and ensures compatibility with DOC's management of the reserve.
- Departure intervals will be at least half an hour apart so that groups are completely independent of one another; and group sizes capped at 15 (including guides) to avoid congestion.
- Use of Public tracks will be limited to a 250m stretch at the top and 500m at the bottom, with the remainder of the product being delivered "off track" and mostly on river right, on the opposite side of the river to the public track. All safety briefings and commentary will be provided on platforms so as to avoid congestion on the public tracks.
- Infrastructure will be sited away from primary recreation nodes to minimise visibility and interaction.
- Introduction of the zipline adds to visitor recreation options in the 12 mile Delta.
- The only other commercial user in the area, Canyon Explorers, consents to this application. It should be noted the ziplining activity is designed to avoid the area used by Canyon Explorers, so there is no detrimental effect on canyoning operations.
- Regular feedback channels will be maintained with DOC and user groups to address any concerns.

## Construction

### Effects:

Construction will involve temporary noise, minor vegetation clearance, and potential soil disturbance. Risks include sedimentation, fuel spills, and compaction if not carefully managed. The works are short-term and localised but could temporarily affect recreational amenity and ecological values if poorly managed.

### Mitigation:

- Use of hand tools and lightweight machinery.
- No in-stream work.
- Erosion and sediment controls will be implemented, including silt fencing if and where required.
- Spill kits will be on site at all times.
- Works will ideally be timed for low-use visitor periods.
- All disturbed sites will be rehabilitated and monitored.

## Heritage

This section is covered by the Kopuwai Consulting report, attached to this application.

In preparing the report, Kopuwai Consulting suggested that it work through any mitigations in conjunction with Matt Schmidt, senior archaeologist with DOC.

In discussing process with Olivia Graham from DOC, it was suggested that the engagement of Matt Schmidt should follow the lodging of this application and that any mitigations should form part of the application for an archaeological authority, which granting could then become a condition of the granting of this concession.

## Safety / Natural Hazards

### Effects:

The zipline activity carries inherent participant risks, and the forested terrain adds exposure to natural hazards such as wind, falling branches, and slope instability. These risks must be managed to ensure visitor safety and protect DOC's reputation as land manager.

### Mitigation:

- Infrastructure will be designed and certified by a qualified engineer to meet safety standards.
- Trees used in and around platforms will be inspected annually by a qualified arborist.
- A full Safety Management System will be maintained, including weather cut-offs, guide training, and emergency response procedures. The applicant brings proven capability from operating Rotorua Canopy Tours, a recognised example of safe and sustainable zipline operations.
- Ongoing hazard assessments will be reported to DOC as part of compliance.

## 6. Resource Consent

### **Resource Management Act 1991 – Resource Consent Considerations**

In addition to requiring a DOC concession, activities of this type may also trigger assessment under the Resource Management Act 1991 (RMA). We have obtained professional planning advice on this matter, which confirms that the proposed guided zipline activity at Twelve Mile Delta does not require a resource consent. The advice from John Edmond and Associates (attached) demonstrates that the activity falls within the permitted activity standards of the Queenstown Lakes District Plan and does not contravene relevant performance criteria. Accordingly, no separate RMA approval is required, and this concession application represents the sole statutory authorisation necessary to enable the activity.