

INTRODUCTION

1. My full name is Mark William Geddes.
2. This is my statement of evidence in relation to Resource Consent Application RM230149 by Queenstown Commercial Parapenters Limited to establish and operate a commercial ropes course at Lakeside Drive, Tekapo.
3. I did not prepare the subject resource consent application but have been involved with the application, by providing planning input and liaising with Council since June 2024.

EXECUTIVE SUMMARY

4. The application proposes a commercial ropes course at Lakeside Drive, Lake Tekapo.
5. While the application was lodged as a non-complying activity under the operative Mackenzie District Plan (MDP), the MDP has since been subject to several plan changes as part of a rolling plan district review, being Plan Changes 20-30. These plan changes amend the activity status of the application to discretionary activity. This change to a more enabling framework reflects an intentional and clear policy change in the new Open Space Zone promulgated under Plan Change 29 that anticipates passive and active recreation, and complementary commercial recreation activities, whereas the focus of the operative MDP was more on passive recreation.
6. Legal counsel will address the effect of Section 88A RMA in relation to the proposal. In particular where the status of an activity becomes less restrictive as a result of a plan change, the less restrictive activity status should be applied. To assist the commissioners, I have however also undertaken an assessment of the application as a non-complying activity overall.
7. The key potential issues with the application identified by Council officers and submitters include:
 - a. adverse effects on other recreation users, including the “exclusive occupation” of the public space under the course.
 - b. adverse effects on public access to the foreshore of Lake Tekapo.
 - c. landscape, visual, natural character effects
 - d. effects on traffic safety and parking
 - e. alignment with district plan zoning provisions.

8. However, the recreational evidence from Ms. Strong establishes that the activity is unlikely to adversely affect other recreation users, exclusively occupy the space, or cause any issues with public access to the foreshore of Lake Tekapo. On the contrary her evidence is the proposal will have positive effects by activating a public space (in and under trees) which is largely dormant. This increases the utility and amenity that the public obtains from this space. The acoustic evidence from Mr. Hay supports Ms. Strong's conclusion that the proposal will not adversely affect other recreation users of the area from an acoustic amenity perspective.
9. Mr. Craig's evidence is that the proposal's potential adverse effects on landscape, visual amenity and natural character values will be acceptable in the context of the site and relevant planning documents.
10. The transport evidence from Mr. Leckie confirms that there is sufficient capacity in the existing carpark to accommodate demand generated from the proposal and that the activity will not likely have adverse traffic safety effects.
11. My evidence found that the activity is not inconsistent with the Passive Recreation Zone of the Operative MDP and is consistent with the Open Space Zone of Plan Change 29. The operative MDP focuses on protecting areas appropriate for passive recreation but does not exclude active or commercial recreation activities. Policy 1 expressly seeks to encourage opportunities for a range of active recreation stating *"To provide for a large range of active and passive recreation opportunities in close proximity to Lake Tekapo"*. Policies 2 and 3 relate to built form, open space and naturalness, which are matters addressed in Mr Craig's evidence.
12. Plan Change 29 zones the site Open Space Zone, the purpose of which is to provide for passive and active recreation. It should be noted that the reporting officer has not considered the latest version of the Open Space Zone that provides several important changes from the notified version of that chapter that he has considered. Policy OSZ-P2 specifically provides for commercial recreation activities which are of a nature and scale that is complementary to the recreational focus of the zone. The Open Space Zone implements this policy by providing for commercial recreation activities as a restricted discretionary activity. The activity defaults to a discretionary activity in the Open Space Zone as the buildings proposed are not associated with a permitted activity. My assessment of the relevant matters of discretion and objectives

and policies of the Open Space Zone found that the proposal aligns with those provisions. Mr Craig and Ms Strong also have the same view. Given that decisions on submissions have been made on Plan Change 29, I consider that significant weighting should be given to that document over the operative MDP.

13. Overall, my evidence found that:

- a. there is adequate information to determine the application
- b. any adverse effects of allowing the activity will likely range from less than minor to minor
- c. there will be positive effects of the activity
- d. the proposal is consistent with relevant statutory planning documents
- e. the proposal is consistent with other relevant Council documents
- f. the proposal aligns with relevant matters of Part 2 RMA.

14. The proposal in my view, is likely to result in a positive, synergistic and sustainable outcome by utilising a public open space that is not currently used (i.e. the trees), activating a public space (below the trees) that is underutilised, complementing other recreational activities in the area, while not compromising the experience of existing users of the area, or adversely affecting landscape and visual amenity values.

15. Accordingly, my evidence concludes that the application passes the gateway test provided by Section 104D of the Resource Management Act 1991 (RMA), is acceptable in terms of the matters under Section 104 RMA and therefore should be granted consent subject to conditions.

QUALIFICATIONS AND EXPERIENCE

16. I am a director and planning consultant at Perspective Consulting Ltd. I have 25 years experience as a professional planner, in three different countries, in both the private and public sectors. This experience includes leading major plan making and policy projects; providing expert planning evidence in the Environment Court and Council hearings; consenting a range of developments; enforcement action; making submissions on national legislation, and national or regional policy; and acting a Hearings Commissioner.

17. My qualifications include a Bachelor of Resource Studies from Lincoln University, New Zealand, and a Master of Science (Spatial Planning) from Dublin Institute of Technology, Ireland (first class honours). I am a full member of the New Zealand Planning Institute.

18. I have previously worked at Mackenzie District Council as a Planner and I am very familiar with the site and environment, having holidayed in the area for nearly 5 decades. I have also spent significant periods of time boating on the foreshore of Lake Tekapo in front of the site.

CODE OF CONDUCT

19. While this is not an Environment Court hearing, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

SCOPE OF EVIDENCE

20. My evidence is discursively set out to providing the following information:
- a. a list of the documents considered in preparing this evidence
 - b. a description of the site and surrounding environment
 - c. a description of the proposed activity
 - d. a list of the resource consents required
 - e. a summary of the relevant statutory considerations
 - f. an assessment of the proposal's actual and potential effects on the environment
 - g. an assessment of the relevant statutory planning documents
 - h. comment in relation to any other relevant matters
 - i. an assessment of the issues raised in the submissions and s.42A report
 - j. an assessment of the proposal against Part 2 RMA
 - k. comment on the sufficiency of the information
 - l. a conclusion
 - m. proposed conditions of consent

DOCUMENTS CONSIDERED

21. In preparing this statement of evidence I have considered the:
- a. resource consent application and associated documents
 - b. submissions
 - c. s.42A RMA Officers' report
 - d. statements of evidence from:

- i. Mr. Andrew Leckie in relation to traffic and access effects
- ii. Mr. Rob Hay in relation to noise effects
- iii. Ms. Samatha Strong in relation to recreation and open space effects
- iv. Mr. Andrew Craig in relation to landscape, visual and natural character effects
- v. Mr. Jamie McMurtrie on behalf of the applicant company
- e. timelapse photography prepared by Mr. Stuart Jackson
- f. landscape plan prepared by Jamie Ward
- g. Resource Management Act 1991
- h. Operative Mackenzie District Plan (MDP)
- i. Mackenzie District Plan Changes 23, 28 and 29 and the proposed designation chapter.

SITE DESCRIPTION

22. The site is located on land owned by Mackenzie District Council and is situated between Lakeside Drive and the Lake Tekapo shoreline in the western end of the township. The location of the site is illustrated in Figure 1. Mackenzie District Council have confirmed they will finalise lease arrangements for the site with the applicant post the decision on the resource consent application.

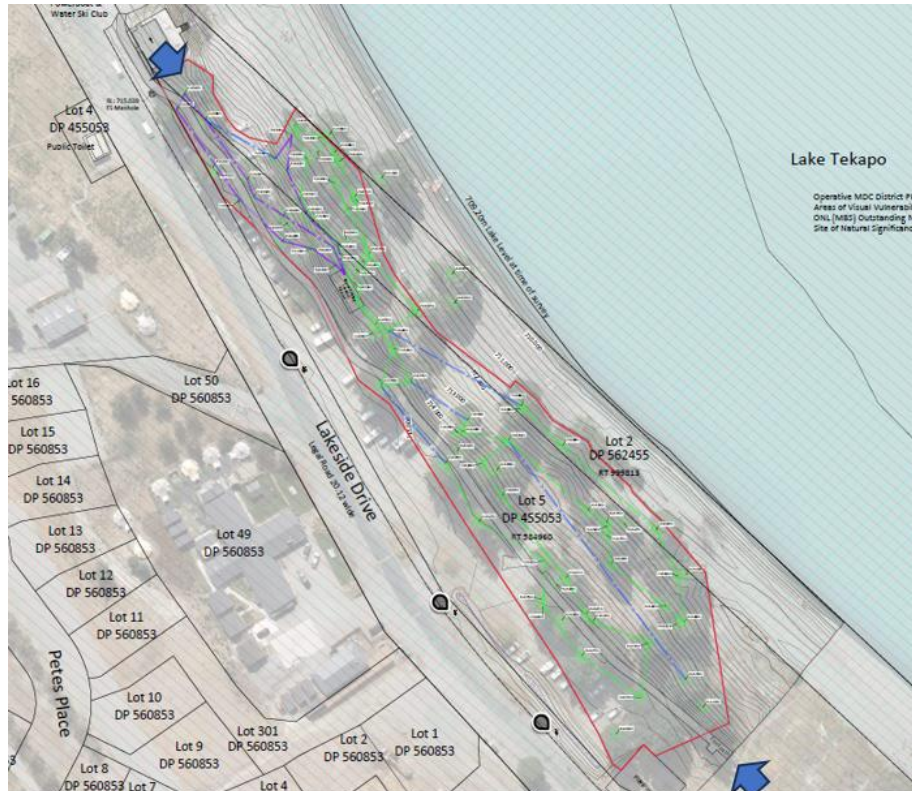


Figure 1 – Location of the site. The extent of the site is illustrated by the red line. The position and orientation of the two cameras that took timelapse photographs of the site are indicated by blue arrows. The indicative alignment of the course is also illustrated. However, the plans in Appendix 1 should be deferred to

23. The site has an area of 8,210m² and includes two parcels of land legally described as:

- a. Lot 2 DP 562455, held in Record of Title 999813, which is 3.092 ha
- b. Lot 5 DP 455053, held in Record of Title 584960, which is 1.477 ha.

24. The site is irregular in shape as its boundaries generally follow the alignment of a group of large existing pine trees.

25. The topography of the site generally slopes gently from south to north towards Lake Tekapo. The ground underneath the pine trees is mostly unvegetated and consists of stones, pine needles and pine cones. Where the ground is vegetated, vegetation consists of brown top grass. Ground conditions under the trees are illustrated in Figure 2.



Figure 2 – Ground conditions under the site’s trees and the footpath that runs through the site. On the left-hand side of the picture is the carpark that adjoins the site to the south. On the right-hand side of the picture is the foreshore of Lake Tekapo. As illustrated in this photo, people using the foreshore generally site forward of the trees or under the trees that are not part of the site.

26. A foot path runs through the site on a west-east orientation and connects the township with the Tekapo hot springs and the other amenities west of the site. In my experience, this footpath is regularly used in busy periods by pedestrians and occasionally by cyclists.

27. The foreshore of Lake Tekapo adjoins the site to the north. As illustrated in Figure 2 the foreshore of Lake Tekapo is a popular destination for recreationalists, particularly in summer. It is used for a variety of active and passive recreation pursuits associated with the lake including powerboating, swimming, kayaking, lounging and walking. However, as illustrated in Figure 2, the area under the trees is not intensively used by recreationalists. The ground conditions under the trees make the area undesirable for sitting. Further, people involved in boating, swimming and lounging tend to sit forward of the site close to the water. While people do use some of the trees on the foreshore for shade in summer, the trees generally used are located north of the site.
28. The site is adjoined by a carpark to the south, which is unsealed, unmarked and largely devoid of metal. During busy periods this car park is well used, but in my experience, it is almost never full. People use this carpark to access the foreshore and lake. People in campervans often park here and have lunch in the carpark.
29. Lakeside drive adjoins the carpark to south and consists of a two laned sealed road that has a west-east orientation. Mr. Leckie's evidence confirms that traffic volumes range from approximately 600-700 vehicle movements per day in winter to approximately 2,500 vehicle movements per day in summer.
30. To the north of the site exists the foreshore of Lake Tekapo, which is used in summer by boaties, swimmers and sunbathers. To the north-west of the beach is a large area of the lake that is cordoned off for swimmers.
31. Accordingly, there are four main activity areas in and adjoining the site, being the foreshore, the walking path, the carpark and the space under the trees. All these areas are well utilised, particularly during summer except for the area under the trees.
32. To provide an evidential basis for how people use the open space under the site's trees, the applicant commissioned a commercial photographer, Mr. Stuart Jackson to take some timelapse photographs of this area. Photographs were taken on Friday 31 January 2025 on a warm clear day at 1 minute and 5 minute intervals starting from approximately 8:30am and

finishing at approximately 7.30pm¹. Cameras were positioned either end of the site opposing each other situated at the Boat Club and near the playground (refer to Figure 1). A link to the photographs is provided separately with the evidence bundle and illustrate that the space under the trees is seldom utilised and is generally only used by people walking between these other spaces.

33. A backpackers and camping ground exist on the southern side of Lakeside Drive opposite the site. Further to the south exists a residential subdivision, named Station Bay. A public toilet block also exists on the southern side of Lakeside Drive.
34. To the west of the site exists the Lake Tekapo Water Ski Club building, which we understand has a membership of 75 families. Their building sits in front of a boat ramp and a large area used for boat trailer manoeuvring and parking. Paddle Tekapo, a kayak and paddle board hire business exist to the north of the ski club on the foreshore of the lake.
35. Further to the west of the site exists the Tekapo Springs hot pools complex that also includes an ice rink and two snow slides during winter and a large inflatable water slide during summer.
36. Also to the west of the site is the Mt John walking track, which is heavily used by walkers, regularly by the local horse trekking business and occasionally by mountain bikers.
37. Resource consent was issued in 2022 (Ref. RM220060) for a Mini Golf in the area between the camping ground and the start of the Mt John walking track and hot pools. I am unsure as to whether that consent has been implemented to date. A café has been consented on Lakeside Drive adjacent to the site.
38. Immediately to the east of the site exists a new Council playground. Further to the east exists the water intake for the Tekapo hydroelectric power facility.
28. The various activities referred to above are indicated in Figure 3. As illustrated, this includes several recreational activities in close proximity to the site. These recreation activities include both commercial and non-commercial recreation activities and passive and active recreation

¹ Note there was a 17minute period when one of cameras batteries were depleted and photos are missing from this period.

activities. The site is also located on the fringe of an urban area that has and is being developed for commercial and residential activities. In terms of the zoning of this adjacent area, it is zoned Mixed Use Zone, Medium Density Zone and Travellers Accommodation. Accordingly, in my opinion, the receiving environment is characterised by a mixture of recreation activities but includes a strong component of active recreation, commercial and residential activities.

29. A Preliminary Site Investigation was carried out in 2014 that confirmed the possible asbestos remnants may be present in the soil on Lot 2 DP 455053 from historic cabins that were demolished between 1954 and 1977. That issue is addressed later in this evidence.

39. A description of the site selection process is provided in Mr. McMurtrie's evidence.



Figure 3 – The context of the site. The yellow line illustrates the foot path and walking tracks.

PROPOSAL DESCRIPTION

40. The application seeks to establish and operate a commercial recreational ropes course on the site. A 56m² base station is proposed along with structures, ropes and associated equipment within the pine trees. Most of the course will be located 3-10m above ground. The activity will operate from 9am to 7pm 365 days a year. The conceptual layout of the ropes course is illustrated in the plan attached as **Appendix 1**. That plan replaces all previous plans.

41. After receiving a briefing from staff, participants will climb along a series of ropes, navigate challenges and utilise zip lines. The ropes course is intended to challenge participants agility and tolerance of height.
42. There are some minor amendments to the activity proposed by the applicant during the course of the application. There are summarised below:
- a. No zip lines will finish at ground level. This means that other than the base station building and some exit ladders, no parts of the course will be at ground level.
 - b. The six picnic tables are proposed at locations on the plan attached as **Appendix 1**. However, a condition of consent is offered to agree the exact location of the picnic tables with Mackenzie District Council. These will be made available to the public and are intended to enhance and activate the area for recreational use, which otherwise has no seating or picnic facilities.
 - c. The base building will no longer be a shipping container, but a bespoke designed building that will be relocatable. It will be clad in a mixture of cedar, glazing and Corten steel at ground floor level with a glazed balustrade at roof level. A feature of the new base station building design is that it will be located downslope of the footpath. This will help mitigate the prominence of this building when viewed from the footpath and Lakeside Drive. Figure 3 provides a render of the base station building, while its plans are set out in **Appendix 1**. It should be noted that base station illustrated in Figure 3 and **Appendix 1** differs from the photomontage submitted with the application and referred to the Council Officer's report and does not include the landscaping proposed in front of the building.
 - d. Some flexibility is required in relation to the alignment and configuration of the ropes course given that the trees are natural and therefore could die, fall or become unsafe. It is also desirable operationally to have some degree of flexibility and to be able to change the challenges in the course. Accordingly, a certification condition is offered to manage that matter.

43. **Appendix 2** of this evidence outlines the latest version of the conditions offered by the applicant.

44. Mr. McMurtrie's evidence provides some photos of similar ropes courses. The photos show a variety of different challenges that will be suspended in the course. The applicant seeks the flexibility of being able to change the obstacles used in the course within a prescribed envelope. The reason for this is that there is a degree of trial and error in terms of what will work for participants. Also, it is desirable to be able to change the course so that it provides a varied experience for repeat customers.

45. While all ropes courses are slightly different in their configuration and context, I note that there are existing ropes courses in Auckland, Christchurch, the Bay of Plenty and Wellington. A link to videos of these courses can be found at www.adrenlin-forest.co.nz.



Figure 3 – Render of the proposed base building. Note that it is located downslope, which will reduce its dominance and obstruction of views

RESOURCE CONSENTS REQUIRED

46. While the application was lodged as a non-complying activity under the operative Mackenzie District Plan (MDP), the MDP has since been subject to several plan changes as part of a rolling plan district review, being Plan Changes 20-30. These plan changes amend the activity status of the application from a non-complying activity to a discretionary activity in respect of commercial recreation. This change to a more enabling framework reflects an intentional and clear policy change in the new Open Space Zone promulgated under Plan Change 29 that anticipates passive and active recreation, and complementary commercial recreation, whereas the focus of the operative MDP was more on passive recreation.
47. Section 88A of the RMA states that the description of activity remains the same as when an application was first lodged and does not change as a result of a plan change or proposed plan resulting in a more restrictive activity status. However, as will be addressed in legal submissions, caselaw confirms that Section 88A RMA does not work so as to preclude an applicant from taking advantage of a more permissive activity status change. This means that where the status of an activity becomes less restrictive as a result of a proposed plan change, the less restrictive activity status should be applied. The reason for this is that there is no need to protect the local authority as it has promoted the easier status (even if has not finally decided upon it as in this case) and it could have prevented the new rule from having interim effect.
48. However, there is not complete certainty that the provisions of these plan changes will not be challenged through an appeal. On this basis I have, out of an abundance of caution, assessed the activity as a non-complying activity overall. However, in some respects, this is a non-complying activity by name but not by nature. As stated above, the recent plan changes promulgate a new zoning that anticipates complementary commercial recreation activities. Accordingly, and given that weight must be given to these new provisions, the non-complying activity status is more technical in nature rather than representing an activity that is not conformity with the expectations of these new plan changes.
49. At the time the application was lodged (December 2023), only plan changes 20-22 had legal effect. However, that has since changed. The status of the various plan changes is identified in Table 1 below.

No.	Chapter	Status
20	Introduction and strategic directions	Operative on 19.12.22
21	Residential, commercial, mixed use, industrial, Tekapo precinct, commercial visitor accommodation	Operative on 27.04.23
22	Light	
23-27	General Rural Zone, Natural Features and Landscapes, Natural Character, Sites and Areas of Significance to Māori, Rural Lifestyle Zones, Renewable Electricity Generation and Infrastructure, Subdivision, Earthworks, Public Access and Transport	Decision made on 31.07.24 but under appeal except the SASM chapter. None of the provisions had legal effect upon notification (4 November 2023). Any provisions that have not been appealed, are to be treated as operative under s.86F RMA.
28-30	<p>Plan change 28 includes Hazards and risk, historic heritage, notable trees and Variation 1 to Plan Change 26 and Variation 1 to Plan Change 27.</p> <p>Plan Change 29 includes Open Space and Recreation Zones, Noise, Signs and Temporary Activities and Variation 1 Plan Change 23, Variation 2 to Plan Change 26, and Variation 2 to Plan Change 27.</p> <p>Plan change 30 includes Special Purpose Zones and Variation 2 to Plan Change 23, Variation 3 to Plan Change 26, and Variation 3 to Plan Change 27</p>	Decisions on submissions were made on 24 July 2025 with the appeal period finishes on 4 Sept 20225. The applicant intends to lodge an appeal against Policy OSZ-P4.2 and the introduction section of the Open Space Zone that states “ <i>Use of these areas is generally informal in nature.</i> ”

Table 1 – Status of Plan Changes 20-30 of the Mackenzie District Plan

Activity Status under the Operative Mackenzie District Plan

50. I firstly consider the activity status of the application under the Operative MDP. The site is located in the operative MDP’s Recreation P (Passive) Zone. The following resource consents are required under the MDP:

- a. Picnic facilities consisting of seating and tables, permanent barbecues and rubbish facilities require resource consent as a controlled activity under Recreation P Zone Rule 4.5.1.a.

- b. The establishment and operation of a commercial recreation activity within the Lake Tekapo Lakefront Recreation P Zone requires resource consent as a discretionary activity under Rule 4.6.2. While the term 'commercial recreation activity' is not defined, I consider that Rule 4.6.2 has been purposely and specifically created to address commercial recreation activities in the Recreation P zone and should be considered separate from 'commercial activity' which require a non-complying activity consent under Rule 4.7.3. It is logical that commercial recreation activities are given a separate and reduced activity status than commercial activities because they are occurring in a recreation zone.
 - c. Buildings and structures for all activities not associated with 'passive recreation' in the Recreation P Zone require resource consent as a non-complying activity under Recreation P Zone Rule 4.7.4. While the MDP does not contain a definition of 'passive recreation', I consider it is reasonable to assume a commercial recreation activity is not a passive recreation activity and therefore a non-complying consent is required under this rule.
 - d. A discretionary activity resource consent is required under the following rules of section 15 (Transport) of the MDP:
 - i. Rule 2a, as the proposal does not provide any dedicated onsite car-parking spaces whereas this rule requires 15 car-parking spaces.
 - ii. Rule 2i, as the proposal does not provide a dedicated on-site loading space whereas this rule requires one loading space.
 - iii. Rule 2d, as the proposal does not provide a dedicated on-site accessible carparking space whereas this rule requires one space.
51. Resource consent is also not required under Rule PREC1-R1 of the Tekapo Precinct under the operative MDP. While the rules of the Tekapo Precinct were made operative in September 2023, before the lodgement of the application in December 2023, the boundaries of the precinct at that stage did not include the site.
52. The proposed sign attached to the base station building is assessed as a permitted activity pursuant to Rule 8.b.
53. Overall, the activity is classified as a Non-Complying Activity under the Operative MDP.

National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

54. Resource consent is not required under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health as the disturbance of land associated with the base station building is within the permitted activity thresholds provided under Regulation 8(3)(c).

Activity status under the plan changes to the Mackenzie District Plan

55. The activity status of the application under the recent plan changes to the MDP and is now considered.

Plan Change 28

Natural Hazards Chapters

56. The base station building is located in the flood assessment area of Plan Change 28. However, the flood hazard assessment attached as **Appendix 4** confirms the building is not subject to any significant flooding risk. Therefore, the requirements of Rule NAT-R1 are met, and the activity, flood hazard perspective, is permitted.

Plan Change 29

57. Plan Change 29 included new chapters for the open space and recreation zone, noise and signs chapters. This plan change is still under the appeal period.

Open Space Zone:

58. A restricted discretionary activity resource consent is required under Rule OSZ-R6 for commercial recreational activities. The matters of discretionary are:

- a. The nature, scale and intensity of the activity.
- b. Compatibility with recreational activities.
- c. Any impacts on other users of the site, or on accessibility.

- d. Consistency with the zone's anticipated character and amenity values.
- e. Any positive impacts of the proposal for users of the area.

59. The application also requires are discretionary activity consent under Rule OSZ-R5.1 as the buildings and structures associated with the ropes course are not ancillary to a permitted activity.

Natural Character Chapter:

60. A restricted discretionary activity resource consent is also required under Rule NATC-R1 in relation to non-compliance with Standard NATC-S1 that requires buildings and structures to be setback 25 from lakes identified in Schedule 1. Lake Tekapo is identified in schedule 1. This standard was amended as a consequence of Variation 2 to Plan Change 23. In terms of the extent of the proposal's non-compliance with the standard, that starting point is Figure NATC-1 that indicates that the 25m setback must commence at the top of the bank. However, it is difficult to determine where the top of the bank is in relation to the site. In this absence of clarity on that matter, I have assumed the setback should be measured from the maximum control level of the lake indicated in Appendix 1. This means the base station building is not within the setback but parts of the course are.

61. The matters of discretion for NATC-R1 are restricted to:

- a. The extent to which the proposed activity will affect the natural character of the surface water body and its riparian margins.
- b. The effects of the proposed activity on any indigenous vegetation, habitat or ecosystem.
- c. Those matters in SASM-MD1 Activities in a SASM.
- d. The nature of any proposed mitigation measures that contribute to the preservation, maintenance or enhancement of the natural character values of the surface waterbody.
- e. The extent to which any restoration or rehabilitation of the natural character of the area is proposed.
- f. The extent to which alternative practicable options have been considered and their feasibility, including the functional need and operational need for the activity to locate in a riparian margin.

- g. Whether the activity maintains and enhances public access along the surface waterbody.
- h. The type and extent of planting proposed and the impact of this on natural character values.
- i. The effectiveness of any erosion and sediment control measures proposed.

Tekapo Precinct:

62. The boundaries of the Tekapo Precinct were changed to include the site in Plan Change 29 to the MDP, which was determined on 24 July 2025. A restricted discretionary activity resource consent is required under Tekapo Precinct Rule PREC1-R1 in relation to non-compliance with Standard PREC1-S4 that requires buildings and structures to have a maximum height of 7.5m.

Matters of discretion in relation to this non-compliance are restricted to:

- a. The consistency of the proposal with the Takapō / Lake Tekapo Character Design Guide contained in Appendix APP2.
- b. The impact of the height on views to the lake.
- c. The location, design, scale and appearance of the building or structure.
- d. Adverse effects on the streetscape.
- e. Adverse effects on the amenity values of neighbours on sites containing residential or other sensitive activities, including visual dominance, shading and effects on privacy.
- f. The extent to which the increase in height is necessary due to the functional and operational requirements of an activity.

Noise Chapter:

63. Noise from the proposed activity is managed by NOISE-R1 and is permitted where it does not exceed the limits set out in NOISE-TABLE 1. The noise limits that apply are that of the zone which receives the noise and in this instance is the Medium Density Residential Zone, the Mixed Use Zone and the Accommodation Special Purpose Zone. NOISE-TABLE 1 does not include a noise limit for noise in the Open Space Zone, so that noise is permitted. Mr. Hay's evidence confirms that the noise from the activity will not exceed the standards set out in NOISE-TABLE 1 for the before mentioned zones. A condition is proposed to ensure compliance with those standards.

Signs Chapter:

64. The Council reporting officer states that resource consent is required for the activity under Rule SIGN-R1 due to non-compliance regarding Standard SIGN-S3.2 that prescribes standards in relation to signs on buildings that project over a public space. I disagree that the proposed sign projects over public space as it will sit flush with the façade of the building. The intention of the rule was clearly to address safety issues or amenity issues with signs projecting over public spaces. As for the signs non-compliance with the minimum letter heights standard, the applicant accepts a condition regarding compliance with those heights.

Traffic Chapter:

65. The Traffic Chapter was introduced into the MDP by way of Plan Change 27. Its provisions are now operative. The proposal does not meet TRAN-R6/TRAN-S1 that states minimum parking requirements as no on-site carparks are proposed. This results in restricted discretionary activity status. The matters of discretion are restricted to those set out in TRAN-MD3 Parking.

66. Overall, the application under the abovementioned plan changes to the MDP is classified as discretionary activity.

67. No other resource consents are required.

Overall Activity Status

68. The activity is classified as a non-complying activity overall in terms of both the operative MDP and the abovementioned plan changes.

STATUTORY CONSIDERATIONS

69. Section 104 RMA lists the relevant matters a consent authority may consider in determining a resource consent application. Relevant to the consideration of this application are:
- a. part 2 RMA
 - b. actual and potential adverse effects on the environment of allowing the activity
 - c. positive effects on the environment to offset or compensate for any adverse effects
 - d. the discretion to disregard adverse effect that are permitted

- e. any relevant provisions of a statutory planning document
- f. any other matter the consent authority considers relevant and reasonably necessary to determine the application.

70. Section 104B RMA provides that in relation to a resource consent application for a discretionary or non-complying activity, a consent authority may grant or refuse the application, and if grants the application, may impose conditions under section 108.

71. Section 104D RMA states that despite any decision made for the purpose of notification in relation to adverse effects, a consent authority may grant a resource consent for a non-complying activity only if it is satisfied that either—

- (a) the adverse effects of the activity on the environment (other than any effect to which section 104(3)(a)(ii) applies) will be minor; or
- (b) the application is for an activity that will not be contrary to the objectives and policies of—
 - (i) the relevant plan, if there is a plan but no proposed plan in respect of the activity; or
 - (ii) the relevant proposed plan, if there is a proposed plan but no relevant plan in respect of the activity; or
 - (iii) both the relevant plan and the relevant proposed plan, if there is both a plan and a proposed plan in respect of the activity.
- (2) To avoid doubt, section 104(2) applies to the determination of an application for a non-complying activity.

72. Section 108 and 108A specify requirements for conditions of resource consents.

ASSESSMENT OF EFFECTS ON THE ENVIRONMENT

73. Before assessing the effects of the activity on the environment, I firstly consider any written approvals, the adverse effects from the existing environment, the permitted baseline and the alternatives considered by the applicant.

Written Approvals

74. Written approvals have been provided by Genesis Energy and Te Arowhenua o Rūnanga. Accordingly, any adverse effects on these parties must be disregarded in the assessment of the effects of the proposed activity.

Existing Environment

75. Section 104(1)(a) RMA requires the consent authority to have regard to any actual or potential effects on the 'environment' of allowing the activity. This is a mandatory consideration rather than a discretionary consideration and must involve a comparison of the actual or potential effects of the activity against the 'environment' as modified by:
- a. the effects on the environment as it exists at the present time
 - b. the future state of the environment as it may be modified by permitted activities
 - c. the effects of the implementation of any resource consents.
76. This is an important component of the assessment of effects on the environment under the RMA as it recognises that activities never occur in a vacuum or environment with no adverse effects.
77. The present environment has been described in the application and has been summarised in this evidence. I consider that the adverse effects on the existing environment of the site includes:
- a. Noise from people, traffic and boats. This includes noise from people walking and riding through the site, primarily on the footpath and Lakeside Drive. It also includes noise from people congregating on the foreshore beside the site where they undertake water sports activities. These activities are often noisy and can involve jetboats, jet skis and power boats. Noise also emanates from vehicles using the carpark and people using the carpark.
 - b. The evidence from Mr. Hay quantifies the existing noise environment and states that existing noise ranges from 56 db to 58 db at the eastern end of the site and 52 db to 54 db LA_{eq} at the western end of the site with the noise primarily coming from local and distant traffic, informal play and boat noise. This noise is above the 50 db LA_{eq} noise limit stated in the new MDP Noise Chapter approved as part of Plan Change 29. This noise monitoring results indicate that the noise environment at the time of recording was

dominated by mostly unnatural noise and is more akin to an urban area than a pristine natural area. Mr. Hay describes it as a moderately noisy environment.

- c. Visual, landscape and natural character effects from the site's existing exotic pine trees, a range of built form in the area, and the activity of people, vehicles and boats moving along Lakeside Drive, using the walking track, and moving through the site and on the lake foreshore and parking area beside the site.
- d. Traffic safety effects from the existing traffic circulating in the area.

78. In summary, the existing environment surrounding the site can at times be busy and often noisy.

79. I now consider the future state of the environment as it may be modified by permitted activities that may occur legally through Plan Change 29 (Open Space Zone) and other recent plan changes.

80. Under the operative MDP, there are no permitted buildings and structures. However, I am mindful that Plan Change 29 may become operative during the course of this hearing and as such its provisions should be considered in the context of what will likely be permitted to occurring the future.

81. As the Natural Character Chapter requires consent for any structures within the 25 m lake setback, there are no permitted activity structures within that setback. However, permitted buildings and structures could occur in the future that are associated with recreational activities under Rule OSZ-R5 in areas outside the 25m natural character setback. Any building or structure would have to comply with the standards for the Open Space Zone and the Tekapo Precinct. Under these rules, a building or structure of 7.5m high and no more than 100m² or 5% of the site could be constructed on the site. Accordingly, it would not be fanciful to assume that a small recreation building could be constructed on the site as a permitted activity. The effects of this building would be comparable to the proposed base building.

82. Recreation activities can occur on the site as a permitted activity. While the definition of recreation activities does not include commercial recreation activities, I consider that the

adverse effects of permitted non-commercial recreation activities can be comparable in character, intensity and scale to proposed activity.

83. There are several activities occurring in and beside the site that are permitted to occur and will in my view likely to continue to occur. As stated above, this includes pedestrians and cyclists using the footpath, people and vehicles using the car park and Lakeside Drive and people and boats using the lake and foreshore. Some of these activities will generate similar levels of noise and activity (e.g. pedestrians and cyclist) while other activities (e.g. boats and vehicles) will likely generate higher levels of noise and activity than the proposal. While sometimes the site and adjoining area is quiet, it is also often busy. The activity levels of the ropes course will tend to reflect the activity levels of the area and therefore when the area is busy, the ropes course will be busy, and when the area is quiet, the ropes course will also likely be quiet. Therefore, in my view, the effects of the ropes course, in terms of character, intensity and scale, will be comparable to the permitted activities that are likely to continue in this area.

84. In terms of the effects of the implementation of any resource consents, the existing environment includes the effects associated with the consented mini golf course to the west of the site as indicated in Figure 3. It also includes the reception/café complex being located to the south of the site identified in Figure 3 under RM220003. In my view, both the mini golf course and café will tend to increase activity levels. The mini golf course will produce comparable effects in terms of noise and activity.

85. In summary, the receiving environment is not a pristine or unmodified area of open space. It is an area that has been highly modified, partly urban and is characterised by high levels of activity during certain times of year, and in particular, is characterised by high levels of existing (and some consented and likely to be implemented) active recreation activities that will likely continue as permitted activities in the future.

Permitted Baseline

86. Section 104 of the RMA allows the consent authority to disregard an adverse effect on the environment that is permitted by a plan or national environmental standard. As stated above, non-commercial recreation activities are permitted and do occur on the site and in the area adjoining the site. This generates adverse effects on the environment such as noise and

activity. Considering that this is how people currently use the area, it is realistic to assume that these non-commercial recreation activities will continue. Therefore, I see no reason why the permitted baseline should not be considered and the adverse effects of noise and activity generated by the ropes course, at least to a certain extent, are disregarded as part of the permitted baseline. Similarly, the adverse effects of permitted buildings should be disregarded.

Alternatives Considered

87. Sub-clause 6(1)(a), Schedule 4 of the RMA requires a description of any possible alternative locations or methods for undertaking the activity if it is likely that the activity will result in a significant adverse effect on the environment. However, there is no evidence to suggest that the proposed activity will likely have a significant adverse effect on the environment. Accordingly, an assessment of alternatives is not required under Schedule 4 RMA.
88. Notwithstanding, the evidence from Mr. McMurtrie explains the applicant considered five alternative sites at Tekapo prior to deciding to proceed with the proposed site. His evidence makes it clear that the four other sites considered were unsuitable for obvious reasons, while the proposed site met the key criteria.
89. With the leading site identified, the applicant then progressed a design process that sought advice from landscape architects, noise consultants, traffic engineers and planners to design a ropes course that will provide for operational requirements and sustainably manage any actual and potential adverse effects of the activity on the environment.
90. This design process has been iterative and started with design team meetings prior to the ropes course design being developed. Comment was then made by the expert on the draft design before it was finalised and the resource consent application lodged. Subsequent revisions of the design and mitigation measures were made in response to Council's further information request, notification report, section 42A report and submissions. This iterative process has considered alternative methods of undertaking the activity (including mitigation measures) throughout the process. The design has now evolved into proposed activity that is presented in this evidence and by the proposed consent conditions.

Economic Effects

91. While the applicant has not commissioned any expert economic evidence, and I am not an economist, it is reasonably obvious that the proposal will have several positive economic effects. These include that the activity will:

- a. Provide a new visitor attraction that will increase local expenditure.
- b. Diversify visitor attractions in Tekapo giving visitors more choice of things to do.
- c. Be an additional reason for people to visit the area and encourage people to stay longer.
- d. Support visitor expenditure across all seasons.
- e. Generate a small number of jobs (up to 6).
- f. Create additional tax revenue.
- g. Create increased demand for local accommodation and services.
- h. Create minor short term positive benefits for the construction industry.

82 Ms Strong's evidence also supports a number of these conclusions. The ability of the ropes course to create an additional reason for people to visit the area and encourage people visiting the area to stay longer has some wider strategic significance. As stated in my evidence further below, this aligns with the Destination Management Plan for the area that seeks to create a range of visitor products to increase longer stays. It also aligns with some specific outcomes which that document seeks for Tekapo, including creating a zip line and providing additional experiences/attractions for youth. The benefits of the proposal creating an additional visitor activity is specifically supported by the Mackenzie Industry Tourism Association submission that states:

"Offering a broad range of activities for visitors encourages a longer length of stay in the region, giving visitors more choice of things to do and see. When providing an activity which is delivered all year round, this supports visitation across all seasons and this helps support spreading economic growth outside the current busy summer season."

92. The proposed activity will also likely support visitor expenditure in other commercial activities in the area. For example, parents and family waiting for participants to use a ropes course are likely to avail of the proposed café adjacent to the site, or combine using the ropes course with visiting another café and restaurant in Tekapo. People visiting the ropes course may also visit the consented mini golf course, hot springs or other attractions in Tekapo as part of a combined visit.

93. It is unlikely that the proposal will have any negative economic effects, noting that trade competition is not a valid resource management issue.

94. Accordingly, I considered the proposal will likely have positive local economic effects.

Social Effects

95. While there is no expert evidence from a sociologist, it is obvious that there will be some social benefits from the proposal. The proposal will generate additional employment which will attract people to the area, who will subsequently contribute socially to the area. The activity will also have positive social benefits by providing a fun and challenging experience for locals and visitors. Ropes courses are designed to challenge people's fear of height and motor skills and in that regard, they can have a positive psychological benefit in encouraging people to overcome their fears and face challenges. It will also have the social benefit of providing children in the area with more things to do. Accordingly, I consider that the proposal will likely have moderate positive social effects.

Cultural Effects

96. Te Rūnanga O Arowhenua is a hapu of Te Runanga o Ngai Tahu and has manawhenua of the area. Aoraki Environmental Consulting Ltd (AECL) represent Arowhenua in relation to resource management matters. I understand they have provided their written approval to the application and therefore no further consideration in terms of impacts on mana whenua is provided.

Landscape, Visual Amenity and Natural Character Effects

97. Mr. Craig has provided landscape evidence for the applicant.

98. As a starting point Mr. Craig considers the receiving environment and notes that it is clearly dedicated to tourist, residential and recreational activity and as a result is quite diverse², essentially urban in character and will become increasingly so as further development occurs³. He also notes that Lake Tekapo and Mt John are prominent natural features within and

² Paragraph 9 Mr. Craig's evidence

³ Paragraph 11 Mr. Craig's evidence

adjoining the receiving environment and the natural character of site is moderately high, although not at all pristine.

99. In terms of landscape classification, Mr Craig notes that the site is not located in an outstanding natural landscape/feature, lakeside protection area, or site of significance but is located in an area of high visual vulnerability, although there are no district plan provisions associated with the latter. The site is also located in the Natural Character Chapter's 25m setback from Lake Tekapo.

100. Mr. Craig's evidence provides a comprehensive assessment of visual amenity, landscape and natural character effects and concludes that:

- a. visual effects are not uniform due to variation in the density of the trees
- b. the course has very little visual bulk and will be mostly visually absorbed into the trees
- c. based on first hand observation, the activity is largely sedate, albeit punctuated by more active use of zip lines
- d. main contributing landscape elements (the trees and landform) will remain relatively unaltered
- e. visual effects and natural character effects will range from minor to less than minor as the proposal is in keeping with its setting.

101. Mr. Craig's evidence points out that the New Zealand Institute of Landscape Architects landscape assessment guidelines, Te Tangi a te Manu, refers to Policy 13 of the NZ Coastal Policy Statement that states that natural character includes "*a range of natural character from pristine to modified*" and reiterates that while natural character is moderately high at the site it is not at all pristine. I agree.

102. Policy 13 also states that natural character includes "*experiential attributes, including the sounds and smell of the sea; and their context or setting.*" The context or setting in this case includes contiguous mixed-use and residential zoned land, Lakeside Drive, a busy pedestrian footpath and foreshore, and a range of active recreational activities. People will experience noise and activity from this existing context. They will also experience any noise, activity and structures that occur as permitted activities in the future. The existing and future context of the site does not appear to have been considered by Ms. Faulkner. Her chief concern appears to be that the noise and the busyness of the activity will diminish visual amenity of the passive

recreation area. However, this view does not consider the existing and future context of the site, nor has it been prepared with the benefit of expert recreational evidence input, unlike Mr Craig relying on Ms Strong's conclusions.

103. Mr. Craig's evidence states that there will be some positive effects resulting from the proposal in terms of removal of some tree limbs that are currently blocking the views to Lake Tekapo from the properties located to the south of the site. Nonetheless he also points out that the beach trees planted in front of the Station Bay subdivision are likely to block those lake views in the future.

104. In terms of long terms effects, Mr. Craig's evidence also states out that the proposed activity is not irrevocable, can be removed, and so the underlying landscape character of the site can potentially be fully restored.

105. Mr. Craig's evidence goes on to consider the proposal's visual amenity, landscape and natural character effects in the context of the relevant district plan provisions and concludes that the proposal:

- a. Ensures amenity expected in PC29 Open Space Zone will be maintained
- b. accords with the Takapō / Lake Tekapo Character Design Guide
- c. more or less aligns with the Passive Recreation Zone assessment matters
- d. is not contrary to both the ODP and PDP objectives and policies.

106. Mr. Craig's evidence⁴ concludes that the proposal's potential landscape, visual amenity and natural character effects are acceptable given the context of the setting and what is expected of it.

107. In terms of mitigation measures in relation to the landscape and visual matters, the applicant proposes a suite of consent conditions requiring:

- a. a maximum limit on the area of earthwork for the base station
- b. a 2m wide area of planting (tussocks) around the base building
- c. regularly water the landscaping around the base building
- d. landscaping around the carparking area adjoining the site
- e. timber platforms to be made from Macrocarpa timber and left to silver off

⁴ Paragraph 217 Mr. Craig's evidence

- f. no single timber ropes course platforms to exceed 2m²
- g. no exterior lighting
- h. cedar, Corten steel and glazing materials for the base building
- i. paint colours of the base building to have a light reflectivity value of between 5 - 30% with natural hues comprising greens, greys and black.
- j. any visible foundations shall be plastered and either painted black or the same colour as the wall cladding.

108. Condition 10 requires the consent holder to install landscaping around the carparking area adjoining the site having regard to any Mackenzie District Council landscaping guideline or master plan for the area. The landscaping must be mutually agreed with the consent holder and the Mackenzie District Council and implemented in a timeframe agreed by Council. This condition is offered as the applicant sees that the upgrade of the adjoining car-parking area will be inevitable. They also consider the amenity of the carpark is low and wants to achieve a positive outcome for the community.

109. Having regard to Mr Craig's evidence and the proposed mitigation measures, I consider that the landscape, visual amenity and natural character effects of the proposal are likely to be minor or less than minor.

Noise Effects

110. Noise evidence is provided by Mr Hay of Marshal Day Acoustics.

111. The evidence from Mr. Hay establishes the existing ambient noise environment ranges from between 57 to 58 dBL_{Aeq} at the eastern end of the site and between 52 to 54 dBL_{Aeq} at the western end of the site with the noise primarily coming from traffic, the carpark, boats and people in the area. This noise is above the 50 db LA_{eq} noise limit stated in the Noise Chapter approved as part of Plan Change 29. The noise monitoring indicates that the noise environment is mostly unnatural and more akin to an urban area than a pristine natural area. Mr Hay describes the noise environment as relatively noisy.

112. Mr. Hay states that outside of peak periods, he would expect the ambient (residual) noise level to drop by up to 6 dB. However, he also expects that the activity noise would also drop

similarly, meaning that the nature of the noise effect will not become greater during quieter periods.

113. Mr Hay assesses the dominant character of noise generated by the activity is traffic noise and vocalisation. However, he states that the character of this noise will be identical or very similar to the existing traffic noise, parking, and informal play that occurs in the area. While he acknowledges that zip lines will have a different character, that noise is not predicted to be intrusive or dominating, or change the level of amenity for other users of the space. Mr. Hay's evidence confirms that the proposal will comply with the noise standards in the Noise Chapter approved as part of Plan Change 29 and recommends a condition to require the same.

114. Mr Hay's evidence concludes that the noise effects of the proposal to be minor at worst, and often less than minor, will be acceptable in the receiving environment and will not significantly alter or degrade the existing amenity afforded by the ambient environment. He also considers that the level and character of noise arising from the proposal will not be unreasonable in terms of s.16 of the RMA and that the proposed conditions related to noise are sufficient to avoid, remedy or mitigate noise from the activity.

115. I accept Mr. Hay's evidence. As such, I consider that actual and potential noise from the activity is expected to range from minor to less than minor.

Effects on Open Space and Recreation

116. A key issue raised by the reporting officers is the extent to which the activity will adversely affect how the site is currently used for recreation. The Council reporting planner expresses concern over the sense of 'exclusive occupation' and potential for discouraging passive recreation beneath the course.

117. However, out of the 8,210m² of site area, only 66m² or 0.8% of that area is occupied by the base building at ground level. Signs will also indicate that the area is public space, while the new picnic tables will encourage people to use the area. At its lowest, the ropes course will be 3m above ground level, with most of the course substantially higher. Accordingly, I consider that the proposal will have a negligible adverse effect in terms of physically occupying available open space in this area or limiting public access.

118. There is also no evidence to suggest that the ropes course will create a perception of exclusive occupation. Ms. Strong dispels that notion by stating that these “assertions of exclusive occupation are not supported by the facts of the proposal nor the reality of similar recreation spaces elsewhere in New Zealand”⁵.

119. Ms. Strong’s evidence was commissioned by the applicant to help understand any actual and potential adverse recreation effects resulting from the proposal. Her evidence firstly examines national research on recreation conflict, identifies a set of assessment criteria suitable for evaluating the proposal's impact on recreational values; and then evaluates the proposal against those criteria. In summary, her key findings in relation to these matters are that the proposed ropes course⁶:

- a. Is unlikely to significantly alter how existing users access or experience Lakeside Drive; will not cause major changes in pedestrian traffic or safety; and will have minimal impacts on existing recreational patterns.
- b. Will not dominate or detract from the primary recreation experience and will continue to allow for current and future recreation to occur.
- c. Will not exceed the site’s carrying capacity, is unlikely to lead to significant user conflict; and will have an overall minor impact on the experience of most users.
- d. The proposed ropes course will activate a previously under utilised space, but it will not displace or compromise any specialised recreation resources at the site.
- e. Will align with the existing tourism context of Lake Tekapō, including the various commercial activities present in the area; and will enhance the recreational options available.

120. Her evidence also states that that the forest floor beneath the trees is covered in uninviting natural debris from the trees⁷ and the additional seating proposed will enhance the visual amenity of this space, activating an unused space⁸. In my opinion, the proposed activity will

⁵ Paragraph 162 of Ms. Strong’s evidence

⁶ Paragraph 78 of Ms. Strong’s evidence

⁷ Paragraph 55 of Ms. Strong’s evidence

⁸ Paragraph 57 of Ms. Strong’s evidence

increase utilisation of the site by the public, not just by the proposed seating, but by the utilisation of the ropes course, which, while being privately owned will be used and enjoyed by the public.

121. In terms of the potential effects on the peacefulness of the area she suggests that passive recreation areas are not synonymous with quiet and tranquil environments, as recreation is seldom noiseless⁹. She also states that when the ropes course is busy, Lake Tekapō, along with the shared pathway and lakefront beach, will also typically be experiencing high levels of activity. Her evidence goes on to state that people seeking remote experiences that involve views of the lake have several options to fulfil that experience nearby¹⁰.

122. I agree with Ms. Strong's evidence and note there is no expert recreation evidence to the contrary. I prefer, and rely on, Ms Strong's conclusions in this regard over those addressed by Ms Faulkner and the S42A report author.

123. With Ms. Strong's evidence in mind, I consider the proposal's actual and potential adverse effects on recreational values and open space will be less than minor and there will be net positive recreational effects from the creation of a new recreation activity and increased seating and picnic tables in the area.

Traffic Effects

124. I consider the key potential traffic issues associated with the proposal are effects on:

- a. the capacity and safety of Lakeside Drive
- b. pedestrian safety
- c. the availability of parking spaces in the area.

125. In relation the potential effects on the capacity and safety of Lakeside Drive, Mr. Leckie's evidence estimates the traffic generation from the activity to be 120 two-way vehicle movements per day, being 60 vehicles arriving and 60 vehicles leaving¹¹. This traffic generation is relatively small in comparison with the existing peak traffic generation at Lakeside Drive of

⁹ Paragraph 17 of Ms. Strong's evidence

¹⁰ Paragraph 62 of Ms. Strong's evidence

¹¹ Paragraph 36 Mr. Leckie's evidence

2,500 vehicles per day¹² or 250 vehicle movements per hour. Mr. Leckie's evidence concludes that the level of additional vehicle traffic will have a negligible effect on the safety and efficiency of Lakeside Drive¹³.

126. In relation to pedestrian safety, Mr. Leckie's evidence similarly concludes that the low traffic generation of the ropes course will have a negligible effect on the safety of pedestrians using Lakeside Drive¹⁴.

127. In respect of the potential effects on the availability of parking spaces in the area, Mr. Leckie's evidence considers the proposal will create a parking demand for less than 10 parks at any one time even on busy days¹⁵. Given this low demand he concludes that there will be more than adequate carparks available in the immediate vicinity of the site to accommodate this demand at almost all times throughout the year¹⁶. He also states that it is common industry practice to not design parking supplies for the busiest time of year¹⁷. If there is any displacement of carparking because of the proposal, he states¹⁸ that:

- a. it will be small in scale
- b. would only occur on the very busiest days of the year
- c. is typically accepted at the busiest times of the year
- d. is a very low-severity effect or inconvenience for a small proportion of users.

128. I agree with the conclusions in Mr. Leckie's evidence. Having visited the site on numerous occasions over the years, my experience is that traffic speed and volumes along Lakeside Drive are generally low and that there is almost always sufficient parking. I have never not been able to park in the area, even on the busiest times of the year.

129. While the application does not comply with the operative MDP parking rules, because dedicated onsite carparking is not provided, I note the site adjoins a public carpark, which has capacity to accommodate the demand for parking generated from the activity.

¹² Paragraph 37 Mr. Leckie's evidence

¹³ Paragraph 40 Mr. Leckie's evidence

¹⁴ Paragraphs 44 and 45 Mr. Leckie's evidence

¹⁵ Paragraph 47 Mr. Leckie's evidence

¹⁶ Paragraph 48 Mr. Leckie's evidence

¹⁷ Paragraph 49 Mr. Leckie's evidence

¹⁸ Paragraph 53 Mr. Leckie's evidence

130. I agree with Mr. Leckie that it is common practice, both in New Zealand and where I have worked overseas, not to design parking to meet the demand of the busiest time of year. The reason for that is that providing for peak parking demand is an inefficient use of land and other resources to address an adverse effect that occurs only occasionally.
131. However, I am conscious that the site's adjoining public carpark is not surfaced with metal, does not have delineated carparking spaces, and does not contain any landscaping. Accordingly, I encouraged the applicant to liaise with Mackenzie District Council transport staff regarding a potential collaboration between the applicant and Council to upgrade the adjoining carpark. To help facilitate those discussions, the applicant commissioned a conceptual landscape plan (Appendix 1) and parking layout for the carpark to illustrate that a better outcome was possible. Council staff were initially receptive to that proposition and thought there was funding to finance the same in the draft budget presented to Council for the Long Term Plan. However, after the Council Long Term Plan was adopted, they confirmed that it did not contain sufficient funding for the carpark upgrade.
132. Notwithstanding, and while I cannot confirm that Council will upgrade the carpark, I consider that it is likely that the carpark will be upgraded sometime in the future. As such and as the applicant will use the carpark, the applicant is still willing to contribute to its upgrading. Condition 17 proposes to pay \$8,000 to Mackenzie District Council for the cost of the gravel to resurface the carpark adjacent to the site within six months of Council confirming that the carpark will be upgraded. It is envisaged that any upgraded carpark would delineate parking spaces, including providing spaces for boat trailers, campervans and buses. Landscape plantings would be established between the carpark and walkway and any buildouts. The delineation of parking will make the carpark more efficient, safe and increase its capacity. The landscaping will increase the amenity of the area. If the carpark upgrade does occur, it will result in potential future positive effects in terms of the efficiency, safety capacity and amenity.

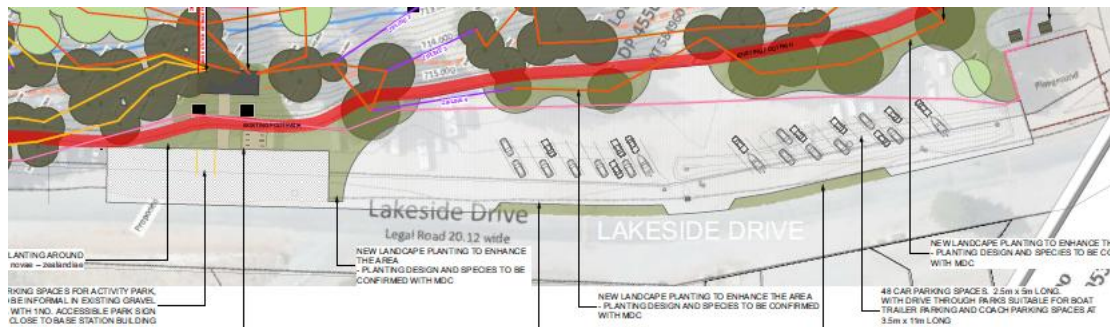


Figure 4 – A indicative parking layout and landscape plan for the carpark that adjoins the site.

133. In terms of other mitigation, the applicant offers a staff travel plan with measures put in place to minimise staff parking in the area. They also offer travel demand management information (condition 22) on its website to encourage participants to use other travel modes. I consider that both will have a positive effect in terms of reducing the demand on carparks in the area. The applicant will also provide signage for an accessible carpark outside the base building.

134. While the Council reporting officer agrees transport effects will be acceptable, he does comment that a complicating matter is the fact that the Council is currently formulating a master plan for car-parking and traffic circulation areas surrounding the Tekapo lake front. However, I understand this master plan does not include the site and is therefore irrelevant.

135. Given the expert evidence from Mr. Leckie and the mitigation measures proposed, I concluded that the proposal's potential adverse transport effects will likely be less than minor.

Effects on Indigenous Biodiversity

136. To my knowledge the site does not contain any significant natural areas, or important biodiversity. The pine trees that the activity relies on are exotic as is most of the grass that exists in places under these trees. Accordingly, it is considered that the proposal is unlikely to have any adverse effects on indigenous biodiversity or habitats.

Infrastructure Effects

137. In respect of infrastructure provision, it is proposed to:

- a. connect to the existing water supply and sewer network
- b. discharge stormwater into a holding tank on site, which will be used for watering plants
- c. connect to the existing electricity network
- d. connect to the mobile telecommunications network.

138. The officers' report does not raise any issue in relation to these matters and accordingly I assume that Council is satisfied with the servicing arrangements. With this in mind, is unlikely that the proposal will have any actual or potential adverse effects on infrastructure.

Light Effects

139. No external lighting, including security light is proposed. Accordingly, it is considered that there will be no adverse effects on the night sky, amenity values, traffic or biodiversity resulting from light associated with the activity.

Natural Hazard Effects

140. The base station building is located in the flood assessment area of Plan Change 28. That plan change was notified on 5 November 2024 and requires under Rule NH-R1 a:

- a. A Flood Hazard Assessment.
- b. The building is located outside of a High Flood Hazard Area as stated in a Flood Hazard Assessment.
- c. The building has a finished floor level equal to or higher than the minimum floor level as stated in a Flood Hazard Assessment.

141. The base building is located 714m above sea level being above the maximum design flood level 713m. Please refer flood map attached as **Appendix 3** and the Flood Hazard Assessment attached as **Appendix 4** that states the site is not subject to any significant flood risk. Therefore, the activity complies with Rule NH-R1 and is therefore a permitted activity under that rule. Accordingly, I consider that any actual and potential adverse risks from flooding will likely be less than minor.

Safety Effects

142. The safety of participants and the public is addressed in Mr. McMurtrie's evidence.

Construction Effects

143. Conditions have been offered by the applicant in relation to construction effects. Conditions will:

- a. limit the scale and nature of earthworks
- b. require construction noise to comply with the relevant applicable New Zealand Standard
- c. require erosion and sediment control measures
- d. require an accidental discovery protocol.

144. Subject to these conditions, I consider that any actual and potential adverse effects associated with the construction of the activity will be less than minor.

Positive Effects

145. I consider the proposal will have several positive effects on the environment.

146. This includes the positive economic effects (discussed above) that in summary include the provision of a new high quality visitor attraction that will increase local expenditure, create diversity in visitor attractions, encourage people to stay in Tekapo longer, support expenditure across all seasons and create jobs.

147. As per Ms. Strong's evidence, the proposal also has the positive benefit of activating a public space (in the trees) which is largely dormant. This increases the utility and amenity that the public obtains from this space. Similarly, the proposal provides for picnic tables for public use in an area where there are currently none. The picnic tables will have the positive effect of enabling families to picnic near the playground and enable tourists who currently have lunch in the carpark, to sit at an appropriate table. This will be convenient and allow people to enjoy the area. As per Ms. Strong's evidence, the picnic tables and temporary seating will also activate a previously underutilised space under the trees.

148. As per Mr. Craig's evidence, the activity will improve the view from the properties to the south of the site by removal of some pine tree limbs that are currently blocking views to Lake Tekapo. The landscaping around the base building and the car park will also improve the amenity of the area.

149. The financial contribution offered by the applicant for the resurfacing of the car park will improve the amenity and functioning of this car park and likely reduce windblown dust on the properties to the south. However, I accept limited weight can be placed on this outcome due to some uncertainty in terms of Council progressing the upgrade.

Cumulative Effects

150. Mr. Craigs' evidence considers cumulatively landscape effects arising from the existing power boat club and proposed base station and concludes that "such effects are a long way from breaching an unacceptable threshold¹⁹".

151. I do not consider that there are any other cumulative effects on the environment.

STATUTORY PLANNING DOCUMENTS

152. The section of my evidence comments on the proposal's alignment with the relevant statutory planning documents referred to under Section 104(1)(b) RMA.

National Environmental Standards

153. There are no national environmental standards that are relevant.

Other Regulations

154. There are no regulations that are relevant.

National Policy Statements (NPS)

155. The activity is well setback from Lake Tekapo and does not generate any discharges and therefore the NPS for Freshwater is not relevant. Being well setback from the lake, it is unlikely that the proposal will adversely affect any hydro electricity generation infrastructure and therefore the NPS for Renewable Electricity Generation is not relevant. The site is not located on highly productive land and therefore the NPS for Highly Productive land is not relevant. Tekapo is not an urban area of over 10,000 people and therefore the NPS for Urban Development does not apply. Accordingly, there are no other National Policy Statements that are relevant to the consideration the application.

¹⁹ Paragraph 102 of Mr. Craig's evidence

Regional Policy Statement

156. The Canterbury Regional Policy Statement 2013 (CRPS) is the operative regional policy statement for the Canterbury area. There is no proposed regional policy statement.

157. Most of the provisions of the CRPS are high level, intended to inform district plans and are not relevant to the proposal.

158. The policies of the CRPS with the most relevance to the application in summary seek to:

- a. provide for activities in lake margins but ensure significant riparian values are maintained or enhanced²⁰
- b. protect and enhance lake margins from inappropriate use and development²¹
- c. maintain or enhance lake margins where they exist in a degraded state and when enhancement will achieve long-term improvement in those values²²
- d. maintain and enhance public and Ngāi Tahu access²³

159. In response to these policies, I note that Mr. Craig's landscape evidence confirms that potential adverse effects from the activities on natural character values will be minor. Ms. Strong's evidence confirms that public will be maintained. Accordingly, I consider the proposal aligns with the relevant provisions of the CRPS.

Mackenzie District Plan (MDP)

160. The entire site is located in the operative MDP's Passive Recreation Zone'. However, while the provision of the Passive Recreation Zone are considered in my assessment below, limited weight should be given to its provisions as the decisions on Plan Change 29 have been made and it changes the zoning of the site to 'Open Space Zone'. Accordingly, more weight can be given to Plan Change 29 with the exception of Policy OSZ-P4.2, which the applicant intends to appeal.

²⁰ Policy 10.3.1

²¹ Policy 10.3.2

²² Policy 10.3.2

²³ Policy 10.3.5



Figure 5 – Map 44B of the Operative Mackenzie District Plan

161. The site is not located in the operative MDP's 'Mackenzie Basin Sub-Zone and Outstanding Natural Landscape overlay' indicated on Map 61. It is located in a flight path protection area, but no rules apply.

162. Lake Tekapo adjoins the site to the north and is subject to the following overlays:

- a. Site of Significance (Operative)
- b. Site of Significance to Māori (Plan Change 24, operative)
- c. Outstanding Landscape (Plan Change 23, legal effect)

163. The High Density Residential zone and Residential 1 zoned land to the south and south-west of the site indicated in Figure 5 have now been rezoned as a result of Plan Change 21 to Mixed Use Zone and Medium Density zone. Plan Change 21 was operative before the application was lodged. However, the Special Travellers Accommodation Zone indicated in Figure 5 is still operative as decisions in relation to the 'Accommodation Special Purpose Zone' proposed under Plan Change 30 is still in the appeal period. The site and parts of the land to the south of the site are also located in the 'Lake Tekapo Precinct' and 'Specific Control Area 7' made operative by Plan Change 21.

141. Plan Change 28 includes a 'liquefaction overlay' over the site and a 'flood hazard assessment overlay' over part of the site.
164. A Notice of Requirement (MDC Designation 51) is indicated in the middle of the site, which is for stormwater treatment and disposal. This Notice of Requirement has been confirmed.
165. The site is not located in the Lake Side Protection area or Outstanding Natural Landscape provided in Plan Change 23 but is located in its Area of Visual Vulnerability (High) overlay.
166. The zoning of the site and surrounding area as per Plan Changes 21 and 30 are indicated in Figure 6, while the various overlays promulgated through the abovementioned plan changes are indicated in Figure 7.

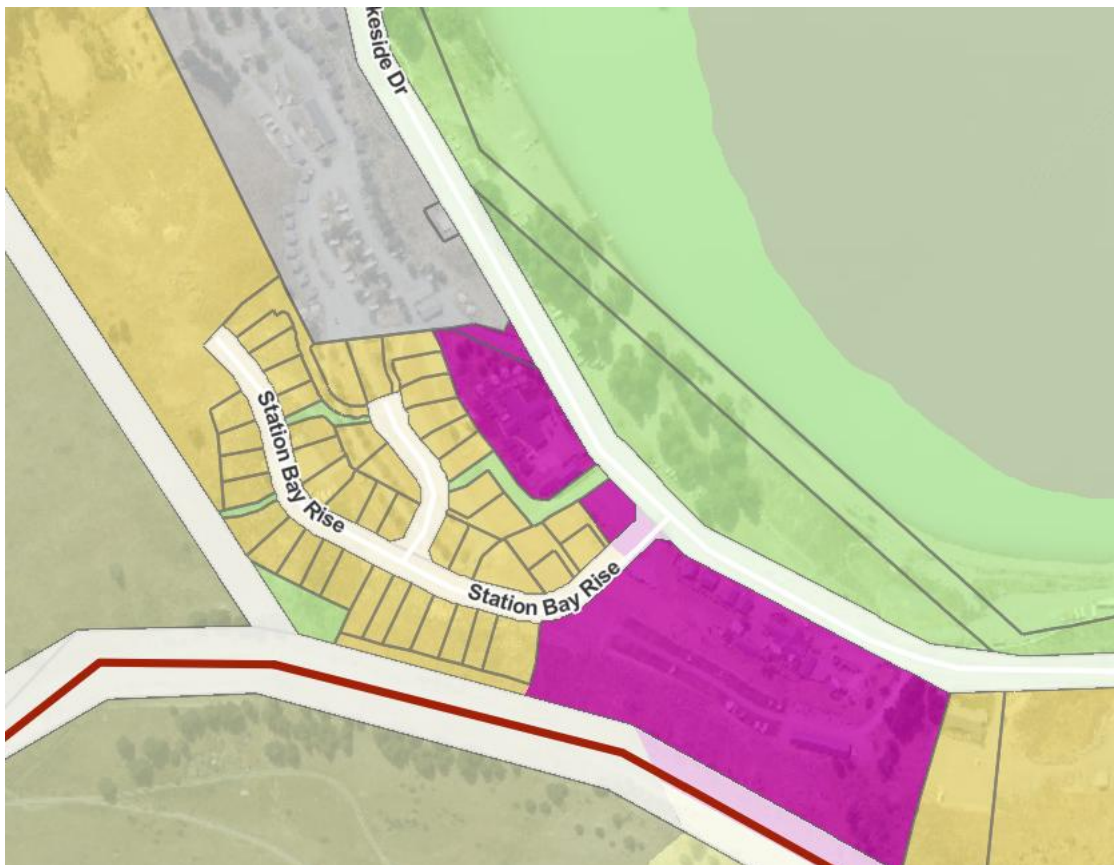


Figure 6 – Zoning of the site and surrounding area as per Plan Change 21 & 29

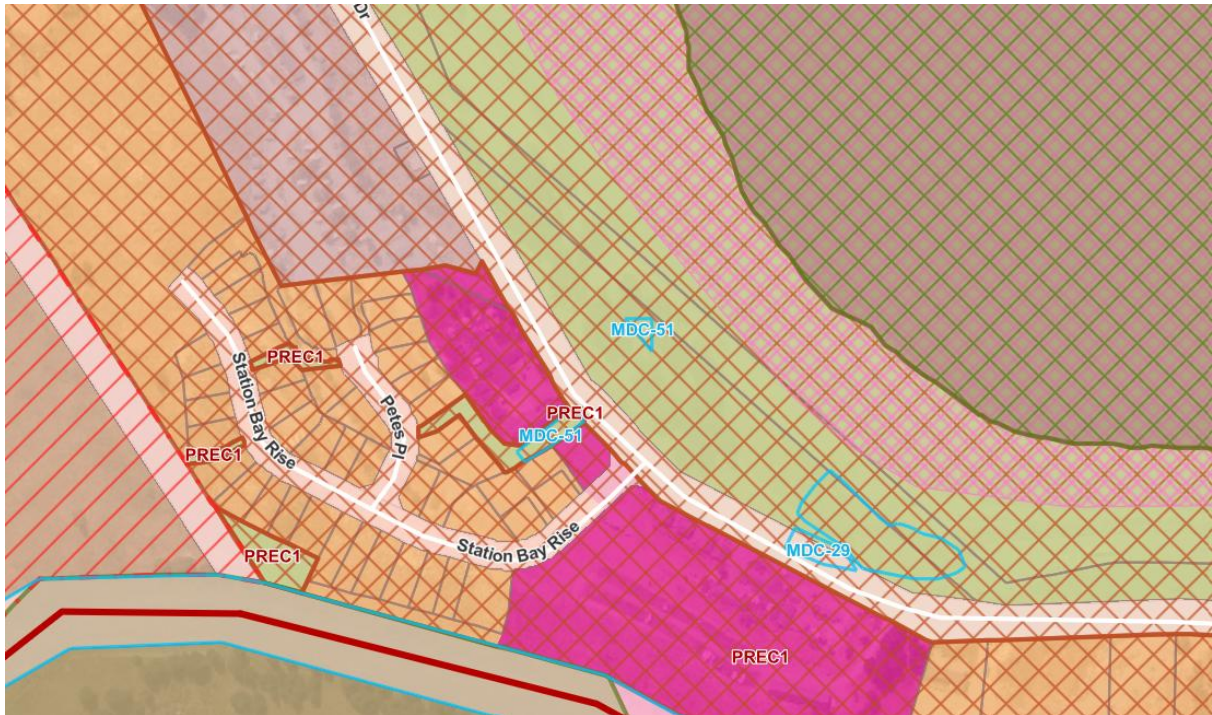


Figure 7 – Overlays of the site and surrounding area under recent plan changes. The site is located in the Open Space Zone (green colour) and is subject to the hatched Tekapo Precinct overlay. Designation 51 is on the site

167. The relevant provisions of the operative MDP are firstly considered.

Passive Recreation Zone

168. As stated, the operative MDP zones the site Passive Recreation Zone.

Purpose Statement

169. The purpose of the Passive Recreation Zone is stated under Section 4.1 of Chapter 9 of the operative MDP as:

“This zone is intended to protect areas considered by Council to be appropriate for passive recreation. Recreational use of these areas is mostly informal in nature involving activities such as walking and playing. These areas therefore often require seating, playground equipment or other small structures. It is the purpose of this zone to maintain their open space or planted character and avoid cluttering with facilities, while maintaining their important role as recreational areas and visual open space for local neighbourhoods and for all residents and visitors.”

170. The focus of the above statement is on protecting passive recreation areas. However, I do not consider that the proposal is inconsistent with protecting passive recreation by proposing

active commercial recreation. The reason for this is that the activity is largely elevated above ground level meaning that the site's existing passive recreational use can continue without constraint or alteration. The evidence from Ms. Strong is that the proposed activity will have very low adverse effects on how the site is currently being used for passive recreation.

171. The purpose statement also mentions the role of the zone is to maintain the zone's open space and planted character and avoid cluttering. The evidence from Mr Craig is that the site's existing landscape and visual character will be maintained.
172. The purpose statement also mentions that the Passive Recreation Zone will often require playground equipment or other small structures. The ropes course is consistent with this part of the purpose statement as it is very similar to, if not constitutes, play equipment and the structures proposed are small.
173. The purpose statement uses walking and playing as examples of the recreation activities anticipated in the zone. The proposed use of the ropes course has similar effects to walking and playing. For instance, people will walk along the ropes in the course and there is an aspect of playing involved in participating in the course. Therefore, it is considered that the proposal is generally consistent with the type of activities anticipated in the zone.
174. Accordingly, I considered that the proposal is not inconsistent with the Passive Recreation Zone purpose statement, it certainly could not be considered contrary to the purpose statement.

Environmental Results Anticipated

175. The environmental results anticipated in the Passive Recreation Zone are stated under Section 4.2 of Chapter 9 as:
 - *"A network of neighbourhood parks providing amenity value and informal recreational opportunities, particularly for children.*
 - *Provision for open space within walking distance of most suburban dwellings.*
 - *Enhancement of town/village amenities by the presence and further development of green open space and opportunities for tree planting.*
 - *In the Lake Tekapo township, the exclusion or mitigation of activities, buildings and structures that unduly interrupt views from the township to the north, or adversely affect*

the open space and visual amenity of the township, particularly along the lakefront of Lake Tekapo.”

176. While I acknowledge that the above-mentioned environmental results anticipated have limited relevance to the proposal, I considered that the proposal is consistent with the above stated environmental results anticipated by:

- a. not adversely affecting the network of neighbourhood parks in the area
- b. providing recreation equipment for children albeit commercial
- c. providing for the further development of open space
- d. ensuring that the structures do not unduly interrupt views to the north or adverse effect visual amenity.

177. The latter is supported by the evidence of Mr. Craig.

Objectives and Policies

178. Objective 1 of the Passive Recreation Zone and its associated policies generally relate to the provision of new open space and recreation facilities. However, they have some relevance and state:

- a. *“Provide a conveniently distributed and accessible range of public open space, community facilities and recreational areas and facilities to meet the diverse needs of residents and visitors to the District²⁴.*
- b. *To encourage, and where possible, provide for a range of recreation opportunities and community facilities within the District²⁵.*
- c. *To ensure the provision of open spaces and recreational areas within or in reasonable proximity to new residential subdivisions to meet the needs of the future community²⁶.*
- d. *To require contributions towards public open space and recreation areas from residential²⁷.”*

179. I consider the proposal is consistent with the above objectives and policies by:

- a. providing a recreation facility that will meet the diverse needs of residents/visitors
- b. being located within reasonable proximity to a new residential subdivision
- c. contributing to the upgrading of landscaping and car-parking in the area.

180. Objective 2 is more relevant as it directly relates to open space at Lake Tekapo, stating:

²⁴ Objective 1, Recreation and Open Space, Chapter 9

²⁵ Policy 1, Recreation and Open Space, Chapter 9

²⁶ Policy 2, Recreation and Open Space, Chapter 9

²⁷ Policy 3, Recreation and Open Space, Chapter 9

“A continuous reserve of open space and passive recreational areas located along the lakeside between and either side of the Lake Tekapo township and Lake Tekapo”.

181. The supporting policies of Objective 2 seek to:

1. *“To provide for a large range of active and passive recreation opportunities in close proximity to Lake Tekapo. [Emphasis added]*
2. *To ensure that built form is minimised, and the open spaces and visual amenity of the lakeside areas are safeguarded.*
3. *To retain the naturalness of the lakeside, and preserve uninterrupted views from the township.*
4. *To provide for the development and maintenance of the Tekapo Domain.”*

182. I consider the proposal is consistent with Objective 2 and its supporting policies by:

- a. not affecting the provision of a continuous reserve of open space along the Lake
- b. providing for and increasing the range of active recreation opportunities close to Lake Tekapo
- c. minimising built form and safeguarding visual amenity
- d. largely preserving views from the lake and its naturalness.

183. The explanation and reasons for adoption of Objective 2 and its associated policies, amongst other things, states:

“In doing so, there may be certain types of activities that may locate within the area that may provide for opportunities for active recreation while safeguarding the amenity and open space. Such activities are provided for as fully discretionary matters within this section of the Plan.”
[Emphasis Added]

184. I consider the proposal is consistent with this statement as it provides an opportunity for active recreation.

185. Although many of the above-mentioned provisions do not specifically refer to commercial activity recreation activities, they refer to providing for opportunities for a large range of active recreation activities. Considering that commercial recreation activities in the Recreation P Zone are provided for by way of a discretionary activity under Rule 4.6.2, I consider the references to active recreation was likely intended as an umbrella term for both commercial active recreation and non-commercial activities. As per Ms Strong’s evidence, the proposed

activity provides for commercial active recreation activities in a way that is complementary to and does not detract from passive recreation opportunities.

186. With these matters in mind, I consider the proposal is consistent with the objectives and policies and associated provisions of the Recreation and Open Space section of the MDP.

Assessment Matters

187. Section 4.8 of the operative MDP contains several assessment matters that it states must be had regard to in considering whether or not to grant consent or impose conditions. These assessment matters are set out below in italics and are followed by a brief comment as to the proposal's alignment with that matter.

4.8.1 The extent to which the proposal will achieve the Anticipated Environmental Results listed in Part 4.2.

188. As stated above, the proposal is consistent with the Anticipated Environmental Results listed in Part 4.2.

4.8.2 The effect of the Proposed Building, Structure or Facility on the open space and visual amenity of the Recreation P zone, and in particular the Zone on the lakefront at Lake Tekapo township.

189. Mr. Craig's evidence²⁸ concluded that *"the proposed ropes course and base station building will have less than a minor effect on the open space amenity of zone in which they are located"*.

4.8.3 The effect on the amenities of adjoining properties, and in the case of Lake Tekapo Township, Lake Tekapo frontage. Consideration should be given to matters of nuisance from noise, dust, glare, hours of operation, obstruction of views, car parking, and visual amenity.

²⁸ Paragraph 148 of Mr. Craig's evidence.

190. In respect of views, Mr. Craig's evidence²⁹ states that the ropes course will have very little effect on the maintenance of views, and views to the lake will actually be improved due to the limbing of some of the pines supporting the activity. His evidence³⁰ does however acknowledge that the base building will obstruct views, but only to a minor extent given its relatively small size. Mr. Hay's evidence confirms that noise and hours of operation will be unlikely to cause a nuisance. Mr. Leckie's evidence confirms that proposal will unlikely cause inappropriate adverse effects in terms of parking availability.

4.8.4 Whether the proposed development will adversely affect the visual coherence and integrity of open space of the zone and the wider landscape.

191. Mr. Craig's evidence³¹ acknowledges there will be an adverse effect on visual coherence and open space integrity, as the proposal will introduce a degree of visual complexity which is not currently present. However, his evidence goes on to state that it will not be to such an extent that it will result in more than minor adverse effects.

4.8.5 The cumulative effect of the development in the context of existing and confirmed future development on the integrity and maintenance of the open space and visual amenity of the zone.

192. Mr. Craig's evidence³² notes that while the proposed activity will add to the sum of physical features within the zone, due to the reasonable degree of separation between each activity, the cumulative adverse effects will be no more than minor.

4.8.6 In respect of the Recreation P zone along the lake shore of Lake Tekapo, the effect of the development on the natural character, visual amenity, retention of views and open space values.

4.8.7 Whether and to what extent the proposed development is likely to adversely affect the open space values with respect to the site and surrounding landscape.

²⁹ Paragraph 149 of Mr. Craig's evidence.

³⁰ Paragraph 150 of Mr. Craig's evidence.

³¹ Paragraph 151 of Mr. Craig's evidence.

³² Paragraph 152 of Mr. Craig's evidence.

193. In relation to these two assessment matters Mr. Craig's evidence³³ concludes that the effects on natural character, visual amenity, retention of views and open space values will range from less than minor to minor.

4.8.8 Whether the site is defined by natural elements such as topography and / or vegetation that may contain and mitigate any adverse effects associated with the development.

194. Mr. Craig's evidence³⁴ states that the key natural elements contributing to the mitigation of potential adverse effects are the pine trees which support the ropes course. He states that the pine trees will visually absorb the ropes course, are visually bulky compared to the course, and elevate the course to avoid visual disruption. He also states that the base building will take advantage of the natural dip in the slope to lower its profile.

4.8.9 The proposed development shall not be visually prominent such that it detracts from public or private views otherwise characterised by natural landscapes.

195. Mr. Craig's evidence³⁵ concludes that the proposal will not be visually prominent due to the inherent character of the activity – namely its largely transparent nature and the fact that it is set among evergreen trees.

4.8.10 The choice of surfacing of vehicle accesses and car parks such that dust nuisance is avoided. The degree to which vehicle access and car parking is necessary, and is located to avoid visual intrusion into the open space and visual amenity of the zone, and to which this is mitigated by earthworks, planting or the like.

196. This matter is not relevant as the carpark is existing. However, as noted above, the applicant is willing to pay for landscaping around the carpark which will mitigate the visual effects of vehicles.

³³ Paragraph 153 of Mr. Craig's evidence.

³⁴ Paragraph 155 of Mr. Craig's evidence.

³⁵ Paragraph 160 of Mr. Craig's evidence.

4.8.11 Whether the location of any new vehicle access or car park is such that access is to a local or collector road and whether direct access to an arterial road is avoided.

197. Not relevant.

4.8.12 The extent to which the design and appearance of new buildings complies with the standards set out in the Lake Tekapo Design Guide contained in Appendix P.

198. This guideline has been superseded by the *Takapō Lake Tekapo Character Design Guide and Medium Density Design Guide*. Mr. Craig's evidence³⁶ confirms that the proposed base station building accords with the design principles listed in the Guide.

199. In summary, the proposal aligns with the assessment matters under Section 4.8 of the operative MDP.

Transportation

200. I now consider the Transportation Chapter of the MDP (Section 15), which is relevant as consents are required under that chapter. However, while consent was required under the Transportation Chapter at the time of lodging the application, its provisions are now inoperative as the new Transport Chapter brought about by Plan Change 27 has not been appealed. Nevertheless, I have considered its provisions in the instance there is debate over its relevance.

201. Objective 1 of the Transportation Chapter seeks:

"Vehicle parking, loading and access which does not detract from the efficiency, safety and amenity of the various activity areas, particularly the state highway network within the District."

202. This is supported by Policy 1A that seeks:

³⁶ Paragraph 163 of Mr. Craig's evidence.

“To protect the efficiency, safety and amenity of various activity areas, the state highway network and the road hierarchy in the District by ensuring adequate on-site parking, loading and access provisions exist.”

203. While no additional or dedicated parking or loading is provided, Mr. Leckie’s transport evidence confirms that adequate parking is provided in the adjoining carpark which is on same site as the activity. The proposal also provides for an accessible carpark, makes a contribution to the landscaping and forming of the carpark, provides 12 cycle parks and provides a travel demand management plan. Accordingly, I consider that despite the technical non-compliance with the Transportation Chapter’s rule, the proposal aligns with the intent of Policy 1A.

204. Overall, I consider that the proposal is in general alignment with the operative MDP.

PLAN CHANGES

205. I now turn to consider the proposal against the relevant plan changes to the MDP.

Plan Change 29 – Open Space and Recreation Zones

206. Plan Change 29 zones the site as ‘Open Space Zone’. As stated, decision on submissions were made on 24 July 2025 but is subject to applicant’s appeal in relation to Policy OSZ-P4.2 and the clause in the introduction about informal activities. As such full weight cannot be placed on those provisions.

207. The version of the Open Space Zone referred to in the s.42A report is the version that was notified as part of Plan Change 29, not the decision version. Therefore, the wrong version of the Open Space Zone has been referred to in the officer’s report. The decision version of the Open Space Zone contains several amendments that change the focus of the zone to include active recreation and how commercial recreation activities are to be assessed. Therefore, I have relied on this decision version of the Open Space Zone instead. The decision version of the objectives and policies of the Open Space Zone are stated below.

Objectives	
OSZ-O1	Zone Purpose
The Open Space Zone provides areas of open space which predominately provide for a range of passive and active ⁴ recreational activities.	
OSZ-O2	Zone Character and Amenity Values
The Open Space Zone contains limited facilities and structures which support the purpose of the zone and maintain the predominance of open space.	

Policies	
OSZ-P1	Recreational Activities
Enable informal recreation opportunities, and facilities that support these, including walking and cycling connections, toilets, playgrounds, sporting equipment and picnic and barbeque areas.	
OSZ-P2	Compatible Activities
Provide for community facilities and commercial recreation activities which are of a nature and scale that is <u>complementary</u> complimentary ⁵ to, and does not detract from, ⁶ the passive recreational ⁷ focus of the zone.	
OSZ-P3	Other Activities
Only allow other activities where they: <ol style="list-style-type: none"> 1. have a functional need or operational need to locate within the zone; or 2. are compatible with the purpose of the zone and do not conflict with recreational uses; and 3. are of a location, nature and scale that does not preclude development of new open space and recreational activities. 	
OSZ-P4	Built Form
Limit the scale of built form within the Open Space Zone to: <ol style="list-style-type: none"> 1. retain a clear predominance of open space; and 2. maintain uninterrupted views from urban areas to any lake and maintain the visual⁸ amenity of lakeside areas. 	

208. My assessment of the provisions of the Open Space Zone firstly addresses the proposal against each provision separately. I then subsequently provide an overview of how I interpreted the provisions collectively.

209. Objective OSZ-O1 makes it clear that the OSZ predominantly provides for a **range** of passive and **active** recreation activities. As the proposal is an active recreation activity, I consider that it is consistent with Objective OSZ-O1. I also consider that the use of the word 'range' was purposefully included to indicate that a variety of recreation activities were contemplated in the zone. As the proposal will be the only ropes course in the zone, I consider that it is also consistent with this objective by providing for a range of active recreation activities.

210. In my opinion the proposal is consistent with Objective OSZ-O2 as limited facilities and structures are proposed and that facilities and structures that are proposed support the purpose of the zone to provide for active and passive recreation. For instance, the proposed ropes course supports the purpose of the zone to provide for active recreation. Further, as

most of the structures are provided above ground, it also supports the purpose of the zone to provide for passive recreation under the course and maintain open space. Mr. Craig's evidence is that the proposal will maintain the predominance of open space and accord with several other associative landscape matters³⁷ expected in this zone and therefore further align with Objective OSZ-O2.

211. I consider that Policy OSZ-P1 is intended to specifically apply to informal recreation permitted activities in the zone and therefore is not directly relevant to the proposal which is directly addressed under Policy OSZ-P2. However, while the proposed activity is not an informal recreation activity (it is commercial) it still enjoys some consistency with Policy OSZ-P1 in that it provides an activity, albeit in a commercial capacity, that is very similar to playground equipment and could be considered sporting equipment, both of which are anticipated by that policy.
212. Policy OSZ-P2 is the zones most relevant policy to the application. That policy specifically provides for community and commercial recreation activities which are of a nature and scale that are complementary to the recreation focus of the zone. The proposal is a commercial recreation activity, so it meets the prerequisite of Policy OSZ-P2 in that it is either a community or commercial recreation activity. In terms of whether the proposed activity's nature complements the recreational focus of the zone, it is an active recreation activity, which aligns Objective OSZ-O1 that specifically states the purpose of the zone is to provide for passive and active recreational activities. Its nature, being predominantly located above ground level also aligns with that objective by still enabling most of the area at ground level to be used for passive and other active forms of recreation. Ms. Strong's evidence agrees, stating that the nature and scale of the activity will complement and will not detract from recreation focus of the zone.
213. Policy OSZ-P3 is not relevant to the application as it applies to activities that are not anticipated to occur. Commercial recreation activities are anticipated to occur as they are listed as a restricted discretionary activity in the Open Space Zone and Policy OSZ-P2 specifically refers to commercial recreation activities. Even if Policy OSZ-P3 was to be applied to the proposed activity, it would meet its underlying criteria by:

³⁷ Prevalent greenery, lake views, access, informal character

- a. Having a functional need to locate in the Open Space Zone which is a zone that's specific purpose is to enable a range of recreational activities to function. It also has an operational need to locate on the site as not all sites in the Open Space Zone have trees which meets the operational requirements of a ropes course in terms of size, strength, number and configuration of trees.
- b. It is compatible with the purpose of the zone (as stated above) and does not conflict with other recreation uses.
- c. As the space below the trees is largely maintained, the location, nature and scale of the activity does not preclude the development of other recreation activities.

189. In terms of the consistency of the proposal with Policy OSZ-P4, I defer to Mr Craig's evidence, which states it will retain the clear predominance of open space, maintain views and the visual amenity of the lakeside area. While Policy OSZ-P4 refers to maintain uninterrupted views from urban areas to the lake, I consider that the views of the urban area to the south and southwest are not uninterrupted and are currently interrupted by the trees on site and vehicles parked in the carpark. In terms of the properties in Station Bay Rise, views of the lake will also be interrupted by the landscaping provided as part of that subdivision. Therefore, I do not consider that this policy applies to the application as it was obviously intended to apply to areas that had uninterrupted views of the lake. Mr. Craig's evidence states that the proposal will maintain the views of properties to the south and southwest. In any event, full weight cannot be placed on this policy as the applicant intends to appeal it.

214. I now turn to the standards of the Open Space Zone.

215. While the 10m height of proposed ropes course is above the 5m height limited provided by Standard OSZ-S1, that standard is superseded by the 7.5m height limit provided in the Lake Tekapo Precinct discussed below.

216. While the proposal is within the 6m site boundary setback provided by OSZ-S2 in places, it predominantly complies with this setback.

217. The proposal aligns with the building coverage standard OSZ-S3 by having a building coverage of 56m², which is significantly less than 5% of site area or 100m² provided by the standards.

218. The proposal aligns with the reflectivity standard OSZ-S4 by having materials that have a light reflectivity of less than 40%.
219. I now turn to the matters of discretion under Rule OSZ-R6 that limit the discretion of the application under this rule to the following matters:
- a. The nature, scale and intensity of the activity.
 - b. Compatibility with recreational activities.
 - c. Any impacts on other users of the site, or on accessibility.
 - d. Consistency with the zone's anticipated character and amenity values.
 - e. Any positive impacts of the proposal for users of the area.
220. Ms. Strong's, and Mr. Craig evidence confirm that the nature, scale and intensity of the activity are appropriate.
221. Ms. Strong's evidence confirms that the proposal will not only be compatible with but will complement the other recreational activities in the area.
222. In terms of any impacts on other users of the site, or on accessibility, the evidence from Ms. Strong confirms that any impact on other users of the site or on accessibility will be very low.
223. Mr. Craig and my evidence confirms that the proposal will be consistent with the zone's anticipated character and amenity values.
224. In terms of positive impacts for users of the area, the proposal will provide a new fun, exciting and challenging activity for users and that will complement the other activities on offer. Ms. Strong's evidence states that the inclusion of publicly accessible additional seating, picnic tables, and signage, will significantly enhance the visual amenity of this space and will activate the unused space underneath the pine trees. I agree. It will also provide picnic facilities where there are none.
225. In my opinion the provisions of the Open Space Zone specifically provide for commercial recreation activity so long as they are complementary to the purpose of the zone which is to provide for a range of active and passive recreation activities. The assessment matters under Rule OSZ-R6 are the principle means in which the appropriateness of the active is to be judged.

Considering the evidence of Ms Strong, Mr Craig and Mr Hay, I considered that overall the proposal is appropriate in the context of the assessment matters of Rule OSZ-R6. Accordingly, and considering my assessment of the relevant provisions, I consider that the proposal has strong alignment with the provisions of the Open Space Zone.

Plan Change 30 - Takapō / Lake Tekapo Precinct

226. The Takapō / Lake Tekapo Precinct is proposed in Plan Change 30 to overlay the Open Space Zone, although it is not yet shown on the e-plan. As stated in the introduction section of the Takapō / Lake Tekapo Precinct, the provisions of both the underlying zone and the precinct apply and where there is conflict between the rules or standards, the rules and standards in the precinct apply and the equivalent rule in the underlying zone does not apply.
227. Rule PREC-R1 permits buildings and structures in the precinct subject to the standards of that precinct and any standards in the relevant zone chapter. Table 1 below summaries the standards of the precinct and states whether the proposal complies with the standards or not. As can be seen from Table 2, the proposal complies with all the relevant standards with the exception of the 7.5m height limit. As stated above, the ropes course has a maximum height of 10m and is therefore 2.5 m higher than the height standard in the precinct. However, it is noted that the effects of that non-compliance are judged by Mr. Craig to be less than minor.

Ref. No.	Standard	Summary of standard	Compliance
PREC1-S1	Materials & colours	Natural unpainted or stained timber, board and batten. Painted or weathering steel.	Complies
PREC1-S2	Roofs	Primary roof forms shall have a flat roof	
PREC1-S3	Building scale	Max. 14m building length along a road	
PREC1-S4	Height	Max. building height 7.5m	Non-compliance 10m

Table 2 – A statement of compliance with the applicable standards of the Takapō / Lake Tekapo Precinct

228. The only objective and policy of the Takapō / Lake Tekapo Precinct are stated below:

PREC1-O1 - Precinct Purpose

“Development within Takapō / Lake Tekapo maintains the distinctive character and identity of the Township and is complementary to the surrounding landscape.”

PREC1-P1 - Adverse Effects

“Control the scale, appearance and location of buildings to ensure that:

- 1. the built form character of the Township is maintained and enhanced;*
- 2. development is integrated with the landscape setting, including the topography, land form, and views to and from the area;*
- 3. key viewshafts within and through land on the south side of State Highway 8 are protected, and accessibility to the Domain and lake are maintained; and*
- 4. views to the lake from properties on the north side of State Highway 8 are maintained.”*

229. In relation to the above-mentioned objective and policy, I note that:

- a. As the proposal complies with most of the standards of the precinct, it aligns with the specific expectations for the zones and subsequently its objectives and policies.
- b. The proposed ropes course is integrated into the site’s trees and therefore the landscape setting.
- c. Mr. Craig’s evidence is that key views will not unnecessarily be disrupted.

230. The matters of discretion under Rule PREC1-R1 in relation to the height non-compliance are restricted to:

- a. The consistency of the proposal with the Takapō / Lake Tekapo Character Design Guide contained in Appendix APP2.
- b. The impact of the height on views to the lake.
- c. The location, design, scale and appearance of the building or structure.
- d. Adverse effects on the streetscape.
- e. Adverse effects on the amenity values of neighbours on sites containing residential or other sensitive activities, including visual dominance, shading and effects on privacy.
- f. The extent to which the increase in height is necessary due to the functional and operational requirements of an activity.

231. Given Mr. Craig’s evidence, I am confident the proposal does not offend any of these assessment matters. The height of the course is an operational requirement of the activity.

232. Accordingly, it is considered that the proposal generally aligns with the provisions of the Takapō / Lake Tekapo Precinct.

Plan Change 23 – Natural Features and Landscapes

233. Some of the provisions of Plan Change 23 have legal effect but are not yet operative as they are subject to appeal, while other provisions are considered operative as they are not subject to appeal. While the site is included in the 'Area of Visual Vulnerability (High)' overlay identified in Plan Change 23, the site is not located in an Outstanding Natural Landscape, Outstanding Natural Features, Lakeside Protection Area, Scenic Viewing Area, Site of Natural Significance or Scenic Grassland area. As such none of the rules of the Plan Change 23 Natural Features and Landscapes Chapter apply, nor do any of its objectives or policies that are all directed at the before mentioned landscape classifications. There are no provisions in the Natural Features and Landscape chapter that address Areas of Visual Vulnerability by themselves without another landscape classification.
234. Further, there are also no provisions in Plan Change 29's Open Space Zone or the operative Strategic Directions Chapter that indicate the Area of Visual Vulnerability should be applied to the consideration of the application.

Plan Change 23 - Natural Character

235. A Natural Character Chapter was included in Plan Change 23 and is now treated as operative as no appeals have been received. However, Variation 1 to Plan Change 23 was notified on the 5 November 2024 and changes a key standard (NATC-S1 and Table NATC-1) that reduces the setback of structures from Lake Tekapo from 100m in Plan Change 23 to 25m in Variation 1. That variation is still in the appeal period. Structures are classified as a permitted activity if this setback is complied with and a restricted discretionary activity if not complied with.
236. The setback of structures under Standard NATC-S1 is measured from the edge of bank of the lake. In my opinion the measurement of riparian area of lake based on the edge of the bank is problematic because often lakes do not have defined banks. This is the case in this instance, as this area of Lake Tekapo does not have a defined bank. As stated above, it would be more appropriate to measure the setback from the maximum operating level of the lake, which would exclude the base station building.

237. The evidence from Mr. Craig is that the proposal will have a less than minor effect on the natural character values of Lake Tekapo. Accordingly, I consider that the proposal will align with the objectives and policies of the Natural Character Chapter that seek to preserve the natural character of surface waterbodies and their margins and protected them from inappropriate subdivision, use and development.

238. I now briefly address the matters of discretion for NATC-R1 which are set out in italics below, followed by my comment in non-italics.

- a. *The extent to which the proposed activity will affect the natural character of the surface water body and its riparian margins.*

Mr. Craig's evidence suggests that effects on natural character will be less than minor.

- b. *The effects of the proposed activity on any indigenous vegetation, habitat or ecosystem.*

There is no indigenous vegetation, or important habitat or ecosystems on the site.

- c. *Those matters in SASM-MD1 Activities in a SASM.*

As AECL have provided their written approval to the application, I consider it does not offend any of the assessment matters under SASM-MD1.

- d. *The nature of any proposed mitigation measures that contribute to the preservation, maintenance or enhancement of the natural character values of the surface waterbody.*

The visual mitigations measures mean that any effects on natural character are low.

- e. *The extent to which any restoration or rehabilitation of the natural character of the area is proposed.*

Restoration has not been recommended by the landscape architects.

- f. The extent to which alternative practicable options have been considered and their feasibility, including the functional need and operational need for the activity to locate in a riparian margin.*

Alternative sites have been considered and discounted. There is a functional and operational need to locate on site.

- g. Whether the activity maintains and enhances public access along the surface waterbody.*

Public access is maintained.

- h. The type and extent of planting proposed and the impact of this on natural character values.*

Planting is limited to the road side of the site. Mr. Craig's evidence suggests that effects on natural character will be less than minor.

- i. The effectiveness of any erosion and sediment control measures proposed.*

None needed or proposed.

239. Considering the alignment of the proposal with these assessment matters, I consider that the proposal is consistent with the natural character chapter.

Plan Change 28 – Hazards and Risks

240. The site is located in the liquefaction overlay and partly located in the flood hazard assessment of the Natural Hazards Chapter of Plan Change 28. As stated, the flood hazard assessment raises no issues with the proposal.

241. While the site is located in the liquefaction overlay of Plan Change 28, the provisions of Plan Change 28 in respect to liquefaction only relate to new subdivision. Therefore, they do not apply to the proposed activity.

242. Accordingly, the proposal does not offend any of the provisions of Plan Change 28.

Plan Change 27 - Transport

243. A Transport Chapter was introduced as part of Plan Change 27. As there are no appeals relation to this chapter, its provisions must be treated as being operative.

244. Rule TRAN-R6 requires 16 car-parking spaces for the activity, one of which is a mobility space. A landscaping strip is also required but no loading space is required.

245. Objective TRAN-O1 is relevant and seeks to promote the use of alternative modes of transport. Policy TRAN-P1 is also relevant and seeks to maintain the safety, effectiveness and efficiency of the district's transport network by amongst other things managing the levels of service by compliance with design standards.

246. While the activity does not provide additional dedicated parking, Mr. Leckie's transport evidence confirms that adequate parking is provided on the same site as the activity. The proposal also provides for the:

- a. an accessible carpark
- b. makes a contribution to the landscaping around the carpark
- c. makes a contribution to forming of the carpark
- d. provides 12 cycle parks
- e. provides travel demand management information on their website to encourage other travel modes to the ropes course
- f. provides a travel plan to Mackenzie District Council with measures to minimise staff parking in the area.

247. Accordingly, I consider that despite the non-compliance with the rules of the Transport Chapter, the proposal aligns with the intent of its objectives and policies.

Designation Chapter

248. The designation chapter was notified on 5 November 2024. It identifies designation MDC-51 on the site (see Figure 6) which is for the conveyance, treatment and disposal of stormwater. My conversation with a Mackenzie District Council three waters officer on 12 February 2025 confirmed that this piece of infrastructure consists of multiple pipes leading to a sump that

discharges stormwater below ground into the lake. Accordingly, it is not likely that the ropes course will affect the designation, or designation will affect ropes course.

Other District Plan Provisions

249. Lake Tekapo is in close proximity to the site to the north and is located within the following overlays:

- a. Site of Significance (Operative)
- b. Site of Significance to Māori (Plan Change 24, operative)
- c. Outstanding Natural Landscape (Plan Change 23, legal effect)

250. However, the Site of Significance overlay and the Outstanding Natural Landscape overlay is located 76m to the north of the site at its closest. While the Site of Significance to Māori overlay is located closer (approx. 30m), AECL has provided their written approval to the application.

Conclusion

251. Overall, I conclude that the activity is consistent with most of the relevant provisions of the operative MDP and the recent plan changes.

Plan Weighting

252. I have commented on the weight to be given to the relevant operative MDP versus the various relevant plan changes and variations in Table 3 below. My recommendations reflect the standard practice of giving more weight to plan provisions that are operative or are well progressed through the plan making process compared with those that have only just been notified.

ODP Chapter	Plan Change & Chapter	Recommended Weighting
Passive Recreation Zone	PC29 - Open Space Zone	Greater weight should be given to Open Space Zone provisions except for Policy OSZ-P4.2 which is under appeal.
Transportation	PC27 - Transport	Full weighting should be given to PC27 as it is not subject to appeal.

Not addressed	PC23 - Natural features & landscapes	Not relevant as the site is not classified as an ONL, ONL or other landscape overlay that has associated provisions.
PC23 Natural character Chapter	Variation 1 to PC23 – Natural character Chapter	Weight should be given to riparian setback standard in Variation 1, which has now been determined.

Table 1 - Comment on the weighting to be given the various plans, plan changes and variations

OFFICER'S REPORT

253. The Section 42A RMA report recommends the refusal of the application. However, this appears to be based on:

- a. An emphasis on the Passive Recreation Zone provisions of the operative MDP.
- b. The incorrect version of the Open Space Zone provisions as originally notified.
- c. Potential adverse effects on recreation, public access and visual amenity.
- d. A notion that the activity will exclusively occupy the public open space.

254. I address these matters briefly in turn.

255. In accordance with the normal practice, weight should be given to the Open Space Zone provisions of Plan Change 29 over the operative MDP Passive Recreation Zone provisions, given the progression of that plan change through the plan making process.

256. The Open Space Zone provisions have been amended in the decision version of Plan Change 29 so that the purpose of the zone is to provide for active recreation. This change of emphasis, along with the other amendments to the zone have not been assessed by the reporting officer. The Applicant's evidence is that the proposal is consistent with the Open Space Zone.

257. The evidence from Ms. Strong dispels any suggestion that the proposal will have inappropriate effects on recreation activities, exclusively occupy or adversely affect public access to the foreshore. The evidence from Mr. Craig and Mr. Hay is that any adverse effects on amenity values will be low and acceptable.

258. In my opinion, the s.42 report places insufficient emphasis on the fact that:

- a. the land under the trees as underutilised
- b. the existing environment is characterised by active recreation activities

- c. those active recreation activities will likely continue and develop in the future
- d. the proposed activity will be consistent with the established recreational activities and the outcomes sought by Council through its new Open Space Zone
- e. the positive effects of the proposal.

SUBMISSIONS

259. I now address the issues raised in the submissions in Table 2 below.

Issue	Response
There are more suitable alternative locations	The Schedule 4 RMA requirement for an assessment of alternative locations only relates to activities with significant adverse effects. There are no significant effects associated with this activity. Accordingly, there is no statutory requirement to consider alternative locations or locate the activity in the best location. In any case, the evidence from Mr. McMurtrie is that alternative locations were considered and that the site was the best location.
Loss of public access	There will be no loss of public access as a result of the proposal as people will be able to access the lake through the ropes course. Signage will clarify that public access is permitted, while the proposed seating and public tables will access into the area.
Loss of public space	The evidence from Ms. Strong is that effects on the loss of public space will be negligible and that the proposed activity will increase the utilisation of the public space. The public space will be enhanced through seating and picnic tables.
Noise effects	The evidence from Mr. Hay is that the noise from the proposal will be acceptable and within the relevant limits.
Effects on passive recreation	The evidence from Ms. Strong is that any effects on passive recreation use of the area will be less than minor. In any case, Plan Change 29 changes the site's zoning to Open Space Zone, which anticipates complementary commercial recreation activities.
Contrary to zone	My evidence is that the proposal is not contrary to the ODP's zone or the new Open Space Zone.
Contrary to the spatial plan	My assessment of the Tekapo Spatial Plan below finds that the proposal it is consistent with it.
Contrary to Part 2 RMA	My evidence is that the proposal is not contrary to Part 2 RMA.

Impact on parking	The evidence from Mr. Leckie is that parking effects will be less than minor.
Impact on traffic safety	The evidence from Mr. Leckie is that proposal's traffic safety and capacity effects will be less than minor.
Visual effects	The evidence from Mr. Craig is that visual effects will be minor.
Natural character effects	The evidence from Mr. Craig and the Council landscape witness is that natural character effects will be less than minor.
Loss of view	The evidence from Mr Craig is that effects on views will be less than minor.
Wilding tree spread	Council has confirmed they are not removing the trees and therefore the proposal will not make any difference to wilding spread.
Stormwater consent	The activity does not require stormwater consent under the regional plan.
Natural hazards	The activity is not sensitive to natural hazards.
Submitter not consulted	There is no statutory requirement for applicants to consult potentially affected parties.
Tree safety	An arborist will confirm the safety of the trees before commencement of the operation.
Container on public land	A shipping container is no longer proposed.
Precedent	My evidence below states that the proposal is unlikely to create an undesirable precedent.
Merit of business	The merit of the business is not a relevant statutory consideration.
Effects on holiday park	The noise and landscape evidence establishes that effects will be less than minor and minor respectively. The activity will complement the holiday park by providing a visitor attraction.
MDC not identified as being affected	MDC were consulted prior to the application being lodged and have add an opportunity to lodge a submission.
Effect from overflow camping overflow	The activity will not affect the ability of the campground to use the adjoining carpark for overflow parking.
Methodology & conclusion of landscape assessment	Mr. Craig provides new landscape evidence and therefore the submission points on the methodology and conclusion of the landscape assessment submitted with the application are irrelevant. Notwithstanding, Mr. Craig's evidence supports the conclusion of the original landscape assessment.

260. In summary, I consider the issues raised in the submissions cannot be substantiated or are satisfactorily addressed by the application and the conditions.

OTHER MATTERS

The Takapō | Tekapo Spatial Plan

261. Mackenzie District Council has recently undertaken a spatial planning process, which led to the adoption of the Mackenzie Spatial Plans 2021. The Takapō | Tekapo Spatial Plan is provided as Figure 8 and indicates that the site is to be used for 'open space'. It does not elaborate on what activities are anticipated as open space. However, the Spatial Plan has been used to inform Plan Change 29 of the MDP. That plan change zones the site Opens Space Zone that includes active recreation and specifically provides for complementary commercial recreation activities. Accordingly, the proposed activity is consistent with the Tekapo | Takapō Spatial Plan and particularly consistent Plan Change 29 that implements the Tekapo | Takapō Spatial Plan.

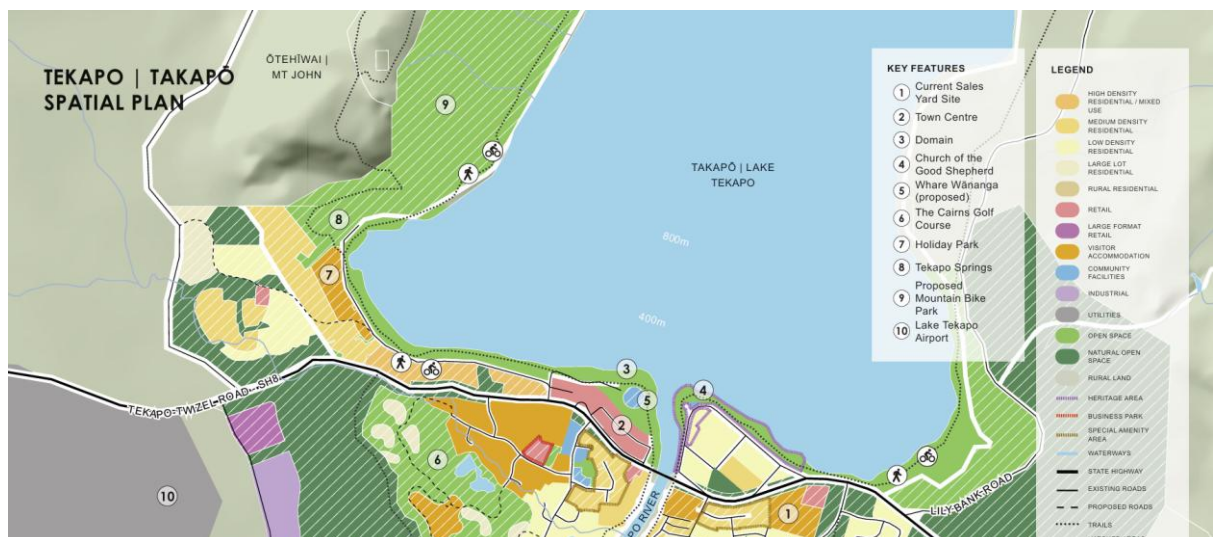


Figure 8 – The Tekapo | Takapō Spatial Plan

Destination Management Plan

262. *Te Manahuna Ki Uta / Destination Mackenzie 2022 Shaping Our Tourism Values for the Future* is a multi-partner strategic plan for the Mackenzie District led by Mackenzie District Council. It provides a Destination Management Plan for the Mackenzie District as part of a wider tourism journey that includes Aoraki Mt Cook National Park, the upper Waitaki Valley and the Lindis Pass. It outlines a coordinated approach to the management of all the elements that contribute to a visitor's experience and aims to create a sustainable and resilient tourism eco-

system for the benefit of the local community. It creates a vision for the next 100 years and has a planning horizon of 30-50 years.

263. Seeking to create a range of visitor products to increase longer stays is key tenet of the preferred scenario of the Destination Management Plan. As discussed above, the proposal provides a visitor attraction that is not currently provided and therefore will diversify visitor attractions and help increase longer stays in the district.
264. Under the 'big moves for Te Manahuna' section of the plan, a Takapō hillside activity precinct is proposed as part of the Top 10 projects. The project description describes the inclusion of a state-of-the art zipline, or similar, and downhill mountain bike tracks. Another recommendation is to create experiences/attractions for youth and 18-35-year-olds including indoor climbing facilities, pump tracks, gym and recreation equipment and other entertainment facilities.
265. While the proposed ropes course is not located on the hill side anticipated by the Destination Management Plan, it aligns with its aspiration to provide experiences and attractions for youth and a zipline and climbing activity anticipated by the plan.

Precedent

266. While the activity has been assessed as a non-complying activity overall, Plan Change 29 classifies the activity as a discretionary activity. As such, Plan Change 29 anticipates this type of activity. Accordingly, it is considered that the proposal is unlikely to establish an undesirable precedent in the future. In any case, I consider that the proposed activity is sufficiently unique and distinctive that it will be difficult for other commercial recreation activities to draw comparisons with it. With these matters in mind, I consider the proposal is unlikely to establish an undesirable precedent.
267. There are no other relevant matters.

PART 2 RMA

268. I understand that reference to Part 2 RMA when considering a resource consent should not be necessary if the applicable planning documents have been competently prepared in a manner

that appropriately reflects Part 2 and with a coherent set of policies designed to achieve clear environmental outcomes.

269. In the context of this application, I considered that the recently approved plan changes have been competently prepared to reflect Part 2 RMA and those provisions are coherent and comprehensive. Therefore, there is no need to go beyond the relevant provisions and specifically assess Part 2 in making a decision. However, in the interest of completeness, I briefly comment on the proposal's consistency with Part 2 RMA.

270. Section 5 RMA states the purpose of the act is 'sustainable management'. I consider that the proposal is consistent with that purpose by:

- a. enabling a commercial recreation activity that will enable people and communities to provide for their social and economic well-being and for their health and safety
- b. not affecting the potential of natural and physical resources to meet the reasonable foreseeable needs of future generations
- c. not affecting the life supporting capacity of air, water soil and ecosystems
- d. being designed to to avoid, remedy or mitigate adverse effects on the environment.

271. Section 6 RMA states several matters of national significance that must be recognised and provided for by decision makers in exercising powers and functions under the Act. The proposal does not offend any of those matters as:

- a. the site is not located in an outstanding natural landscape/feature
- b. the protects the site's natural character
- c. the site does not contain any significant natural areas
- d. it maintains public access to Lake Tekapo
- e. the site is not located in a site of significance to Māori
- f. the site does not contain any historic heritage
- g. there are no customary rights associated with the site
- h. it is not sensitive to the rest of natural hazard.

272. Section 7 RMA provides several other matters that decision makers must have particular regard to in exercising powers and functions under the Act. The key matters of relevance are 'kaitiakitanga' and the maintenance and enhancement of amenity values. In terms of the former, AECL have been consulted and provided their written approval, which provides for the exercise of kaitiakitanga. In relation to the latter, the landscape evidence from Mr. Craig is that

amenity values will be maintained and enhanced. Accordingly, I consider the proposal aligns with Section 7 RMA.

273. In terms of section 8 RMA which requires decision makers to take account the principles of the treaty of Waitangi, it is considered the applicant's consultation with AECL meets that obligation.

SUFFICIENCY OF INFORMATION

274. Considering the noise, landscape, recreation, traffic, applicant, planning and legal evidence provided and the extensive information provided in the application and further information response, I consider there is sufficient information to determine the application.

CONCLUSION

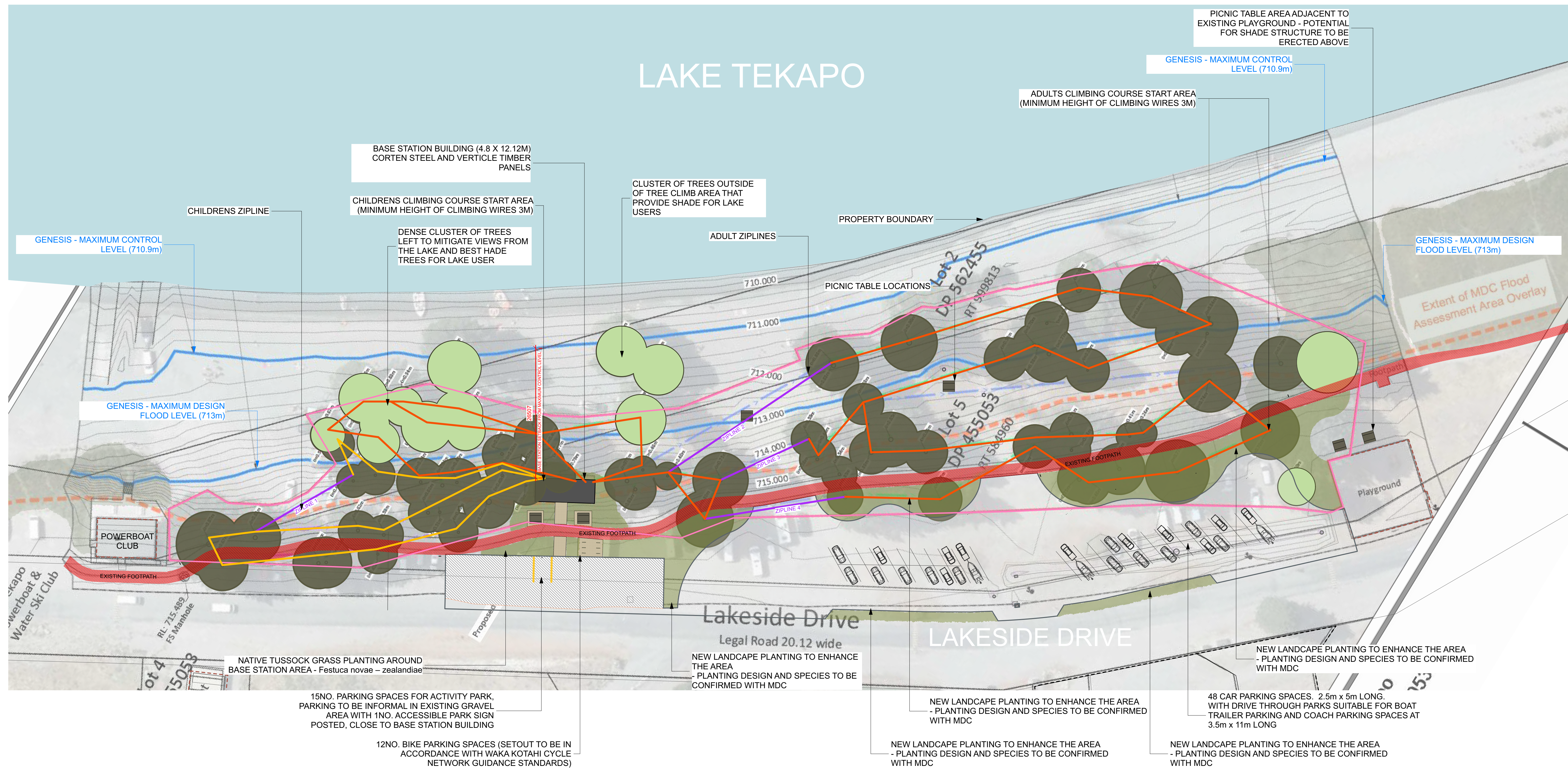
275. The application proposes a commercial recreation ropes course at Lakeside Drive, Lake Tekapo. The activity is classified as a non-complying activity in terms of the operative MDP and a discretionary activity in terms of the recent changes to the MDP. However, the overall non-complying activity status of the application is 'technical' rather than representing an activity that is contrary to the new Open Space Zone promoted by Council through Plan Change 29. Considering the progress of Plan Change 29 through the plan making process, greater weight should be given to the provisions to the Open Space Zone that specifically anticipates commercial recreation activities.
276. The pertinent policy of the Open Space Zone in respect of this application is whether commercial recreation activities complement the recreational focus of the zone. The Applicant's evidence concludes that the activity will be complementary to the recreational focus of the zone that seeks to provide for areas of open space that predominantly provide for passive and active recreational activities.
277. The proposal in my view, is likely to result in a positive, synergistic and sustainable outcome by utilising a public open space that is not currently used (i.e. the trees), activating a public space (below the trees) that is underutilised, complementing other recreational activities in the area, while not compromising the experience of existing users of the area.

278. My evidence found that:

- a. any actual and potential adverse effect of the activity will likely range from less than minor to minor
- b. the proposal will have several positive effects on the environment
- c. the proposal is consistent with relevant statutory planning documents
- d. the proposal is consistent with other relevant Council documents
- e. the proposal aligns with relevant matters of Part 2 RMA
- f. there is adequate information to determine the application

279. Accordingly, my evidence concludes that the application passes the gateway test provided by Section 104D of the Resource Management Act 1991 (RMA), is acceptable in terms of the matters under Section 104 RMA. Consequently, I considered that resource consent should be granted subject to conditions.

APPENDIX 1 – PLANS



LANDSCAPE KEY

EXISTING FOOTPATH

AREA FOR 15NO. CAR PARKS

CARPARKING AREA

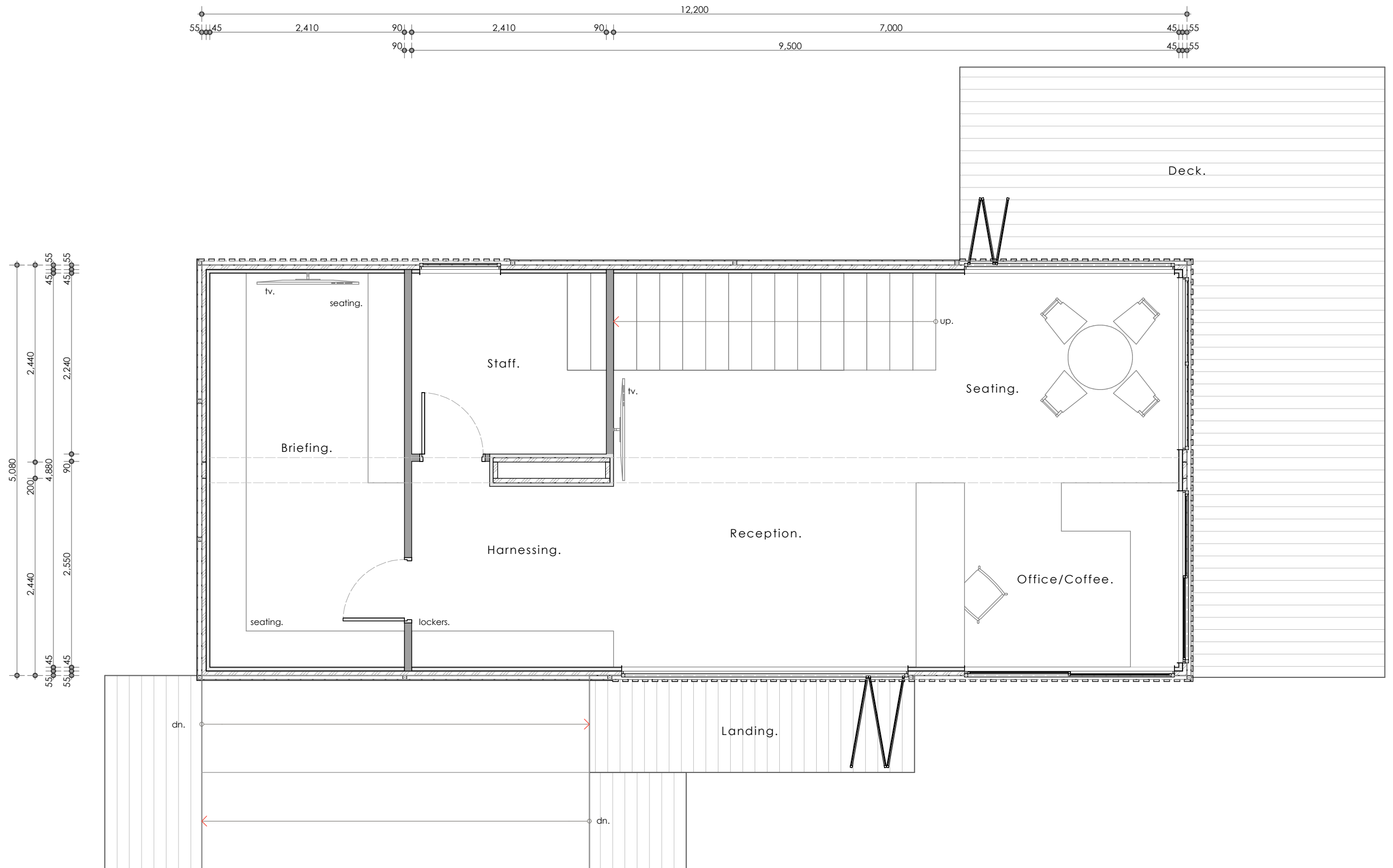
PROPOSED ROPES COURSE AREA

ZIPLINES

ADULTS CLIMBING COURSE

CHILDRENS CLIMBING COURSE

TREES OUTSIDE OF TREE CLIMBING COURSE



Ground Floor Plan.
Scale 1:50





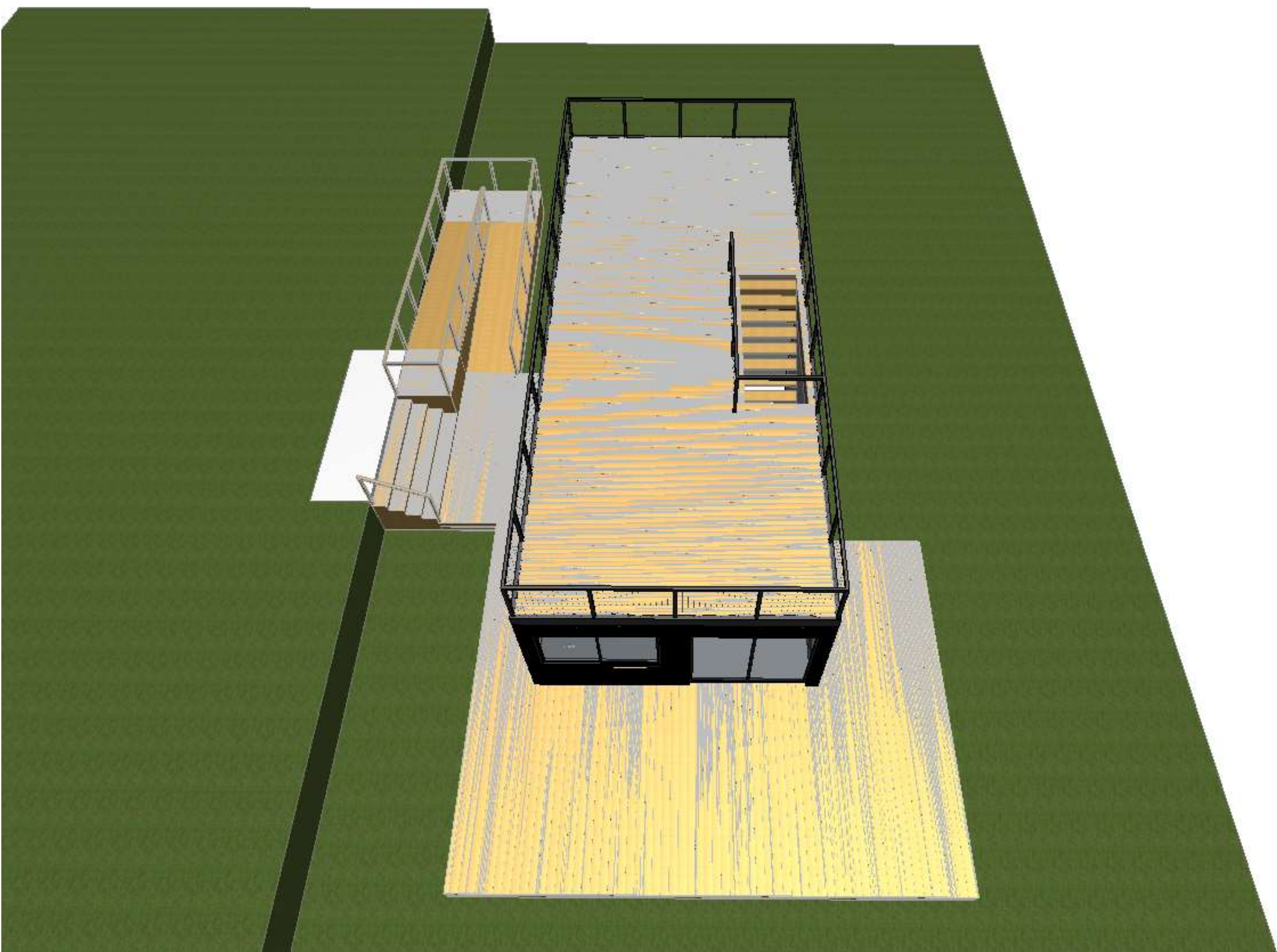














APPENDIX 2 - PROPOSED CONDITIONS OF CONSENT

Amendments to the proposed conditions of consent suggested in the application are shown as ~~strikeout~~ (for deletions) or red underlined (for additions)

General

1. The development shall be carried out in general accordance with the application as submitted under reference number XXXX and Site Plan stamped as approved on [date], unless otherwise amended by the conditions of consent.

Arborist Assessment

2. Prior to the commencement of earthworks and construction, each tree which forms part of the approved ropes course must be assessed and confirmed as being structurally sound and capable to appropriately support the ropes course. The assessment and confirmation must be carried out by a suitably qualified arborist and be provided to Mackenzie District Council's Parks and Recreation Manager.

Earthworks

3. Earthworks, excluding the establishment of the landscaping, shall only be undertaken in association with the footing of the base station building. The maximum area of disturbed ground shall be 60m², the maximum volume of earthworks shall be 30m³, while the ~~to a~~ maximum depth of earthworks shall be 1m.

Construction

4. During the construction period, noise shall comply with NZS 6803:1999 for Construction Noise.
5. During the earthworks period, erosion and sediment control measures shall be implemented by the Contractor.

Accidental Discovery Protocol

6. Should an accidental discovery of any archaeological material (including oven stones, charcoal, shell middens, ditches, banks and pits, building foundations, artefacts of Māori and Non-Māori origin or human burials) occur during the undertaking of any earthworks:
 - (a) Earthmoving operations in the affected area shall cease immediately, and the affected area shall be secured to ensure the archaeological material is left undisturbed;

- (b) Heritage New Zealand Pouhere Taonga and Te Rūnanga o Arowhenua shall be advised of the disturbance and provided access to the affected area to enable appropriate procedures and tikanga to be undertaken;
- (c) If the material is confirmed by Heritage New Zealand Pouhere Taonga as being archaeological, under the terms of the Heritage New Zealand Taonga Act 2014, an archaeological assessment shall be carried out by a qualified archaeologist, and if appropriate, an archaeological authority shall be obtained from Heritage New Zealand Pouhere Taonga before earthworks resume;
- (d) If there is evidence of burials or human (kōiwi tangata) having been uncovered, the New Zealand Police shall be contacted immediately;
- (e) Such earthworks shall not recommence until an archaeological assessment has been made, all archaeological material has been dealt with appropriately, and approval to recommence has been given by Heritage New Zealand Pouhere Taonga, and if human remains are involved, the New Zealand Police.

Landscaping

- 7. Prior to the commencement of the activity (following the construction phase), a 2m wide landscaping area shall be established around the perimeter of the base station building. The landscaping strip shall be planted with *Festuca novae-zelandiae* (tussock) with 7600mm spacings and planted immediately following the installation of the base building.
- 8. The landscaping required by Condition 7 shall be regularly watered for at least 2 years from the date of planting, and shall be appropriately maintained. If any of the landscaping required by Condition 7 is diseased or dying, the species shall be removed and then replaced in the following planting season with the same species.
- 9. In a timeframe agreed with Mackenzie District Council, the consent holder must install landscaping around the carparking area adjoining the site having regard to any Mackenzie District Council landscaping guideline or master plan for the area. The landscaping must be mutually agreed with the consent holder and the Mackenzie District Council.

Ropes Course

- 10. At least 20 working days prior to development commencing, the consent holder must submit plans detailing the alignment and configuration of the ropes course to the consent authority to certify that the ropes course meets the following requirements:
 - a. The ropes course must be located within the site boundary as indicated on the plan attached to this consent and stamped as approved.

- b. The ropes course must be located no less than 3m above ground level, except for course entry and exits points.
 - c. Zip lines must not finish at ground level.
 - d. The ropes course can consist of 1 to 5 support wires on each span between trees.
 - e. Each group of support wires can include challenging points or obstacles, which the consent holder may change periodically.
 - f. The ropes course can include any wires, ropes, structures and equipment required to secure the platforms and lines to the trees while ensuring health and safety outcomes are achieved.
 - g. Only zip lines can span the central gap between trees as illustrated on the ropes course conceptual layout plan stamped as approved and attached to this consent.
 - h. Each tree in the course can have up to 3 platforms which may include ladders, devices or structures to ascend or descend the tree. Individual timber platforms must not exceed 2m² in area measured horizontally.
 - i. All timber platforms must ~~shall~~ be Macrocarpa timber and shall be left to silver off naturally.
11. The activity must not commence until the details of the ropes course required in Condition 10 have been certified by the Consent Authority as implementing the requirements of that condition.
12. The Consent Holder may amend the ropes course alignment and configuration at any time to:
- a. Change the course to address any tree(s) that is/are damaged, dying, fallen, diseased or has otherwise become unsafe.
 - b. To further reduce the potential for adverse effects on the activity.
 - c. To create positive effects on the environment.
 - d. To address any operational requirements.
13. Any amended ropes course design under Condition 12 must be provided to the Consent Authority within 20 working days of its amendment for recertification in accordance with Condition 10. The ropes course must not be amended in a manner that contravenes the requirements set out in the conditions of this resource consent.

Base Station Building

11. The ground floor exterior cladding of the base station building must ~~shall~~ be either cedar timber stained ~~with a natural hue or dark charcoal, browns, greys,~~ or left to silver naturally, and ~~for~~ Corten steel and glazing. The roof of base station building must have a glazed balustrade supported by steel posts and rails that are painted or powder coated with a matt

or powder finish. Paint colours shall have a Light Reflectivity Value of between 5 - 30% and shall have natural hues comprising greens, greys and black.

12. Any visible foundations shall be plastered and either painted black or the same colour as the wall cladding.
13. A timber deck is permitted around the base station building but must not be more than 50m².

Land Transport

14. Prior to the commencement of the activity, an accessible parking space shall be established, as shown on the approved plan that is stamped as approved and attached to this consent, and shall be formed and marked in accordance with an approved service consent, or to a standard otherwise approved by Mackenzie District Council's Roading Manager.
15. Prior to the commencement of the activity, 12 cycle parks shall be established, as shown on the approved plan that is stamped as approved and attached to this consent, ~~Concept MasterPlan dated XXXX~~ and shall be formed and marked in accordance with an approved service consent, or to a standard otherwise approved by Mackenzie District Council's Roading Manager.
16. The consent holder is to provide travel demand management information on their website to encourage other travel modes to the ropes course. This will include a warning that car parking can be in short supply at busy times of year, and that walking and cycling from the village centre is viable for most people. It will also include a simple map highlighting the location of the site relative to the lakeside walking / cycling path and information on the cycle parking available.
17. The consent holder is to provide a travel plan to Mackenzie District Council with measures to minimise staff parking in the area.
18. The consent holder must pay up to \$8,000 to Mackenzie District Council for the cost of the gravel to resurface the carpark adjacent to the site within six months of confirmation from Mackenzie District Council that the carpark will be upgraded.

Noise

19. Following the commencement of the activity, noise levels shall not exceed ~~50dBA Leq at the notional boundary of any residential activity between 7am and 10pm, and 40dBA Leq and~~

~~70dBALmax at all other time~~ the following noise levels at any point within the boundary of another site

- 50 dB LAeq (15 min) between 0700 and 2200
- 40 dB LAeq (15 min) between 2200 and 0700
- 70 dB LAFmax at any time

Noise shall be measured in accordance with NZS 6801:2008 Acoustics – Measurement of Environmental Sound and assessed in accordance with NZS 6802:2008 Acoustics – Environmental Noise.

20. The ropes course may operate 7 days a week, 365 days a year but only between 9am and 7pm.

Course Users

21. There shall be no more than 60 users on the course at any one time.

Sign

22. A 2.5m² sign may be attached to the southern exterior façade of the base station building and must sit below the roof profile. The sign shall ~~state “Tree Climb Lake Tekapo” and~~ have a ~~maximum~~ minimum lettering height of ~~1500~~mm. The sign shall have a Light Reflectivity Value of between 5-30% and must not be illuminated.
23. Signs indicating that the area under the site’s trees is a public open space shall be located at the locations indicated on the plan attached to this consent and stamped as approved.

Hours of Operation

24. The activity may operate between the hours of 9am and 7pm, 365 days of the year.

Picnic Tables

25. Prior to the activity commencing, six timber picnic tables must be located at the site at locations indicated on the plans stamped as approved and attached to this consent or as otherwise agreed in writing with Mackenzie District Council in writing. Each picnic table must have a small sign indicating they are available for public use.

Lighting

26. There shall be no exterior lighting incorporated into the ropes course.

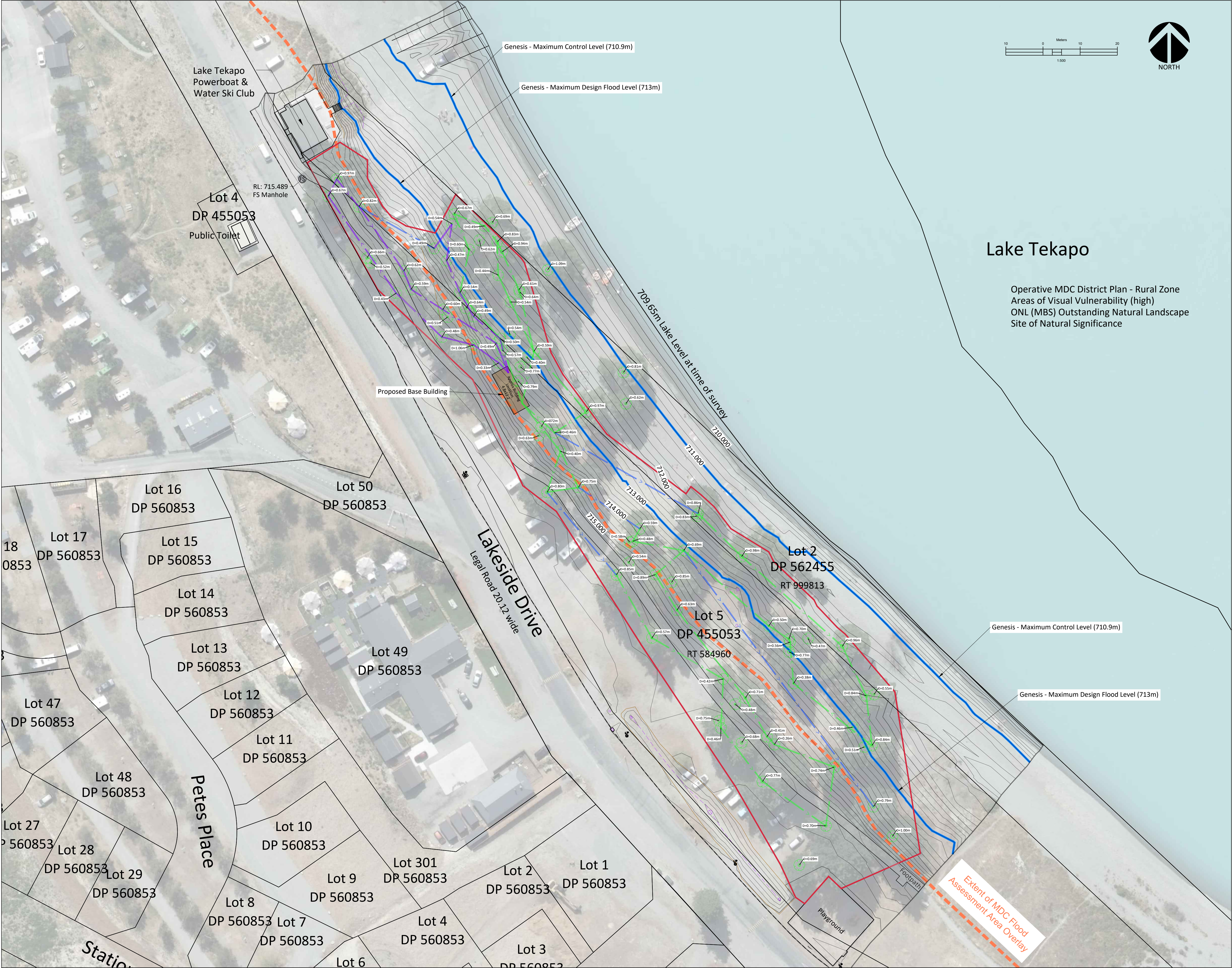
Stormwater

27. Stormwater from the base building must be collected and stored and used to irrigate landscaping on the site.

Electricity Supply

28. The electricity supply must be provided underground to the base building.

APPENDIX 3 – FLOOD MAP



Issue	Date	Reason	Approved
A	07/23	For discussion	DJS
B	02/24	Update site area	DJS
C	08/25	Vertical datum change. Add FHA area.	GPM

Client: QCP Limited
Owner: Mackenzie District Council
Address: Lakeside Drive, Lake Tekapo
Appellation: Lots 2 & 5 DP 455053
RT Reference: RT 999813 & RT 584960
Total Area: 4.569 ha

Survey Datum:
Horizontal: NZGD2000, Timaru Circuit
Vertical: Lyttelton Vertical Datum 1937

Origin Point: MN B DP 352127
Easting: 353000.719 mE
Northing: 843784.571 mN
RL: 746.31 mH

- Notes:
- All dimensions in metres unless shown otherwise;
 - Survey Completed by Malvin Howey and Zoltan I Levay on the 24/04/2034
 - Equipment used: Leica GNSS RTK GS14 receivers SN #2810935, #2810968 and Leica TS15 Robotic Total Station SN # 162559
 - Heights transferred using GNSS
 - Existing boundaries adopted from GRIP Online database
 - Boundary dimensions and areas are subject to title survey
 - Aerial Photography: <https://basemaps.linz.govt.nz/> DXF created by Grip on 10/05/2023. (<https://grip.co.nz>)
 - For dimensions, areas, easement, covenants and consent notice information, refer to Lots 2 & 5 DP 455053, RT 584960 and RT 999813
 - Major contours shown at 1.0m intervals
 - Minor contours shown at 0.2m intervals
 - Existing services shown are based off MDC's GIS recorders and should be treated as indicative only
 - Visible service at ground level were picked up as part of this survey, a full assessment of underground services was not undertaken
 - Existing services are located within the proposed works area, including services not necessarily shown on this plan. It is the Contractors responsibility to locate and protect all existing services including liaison with the relevant Service Authority, Council or Land Owner

- Key:
- Fence
 - Building Line
 - Bottom of bank
 - Tree with diameter (DBH)
 - Sump
 - Foul Sewer manhole
 - Stormwater manhole
 - Lamp pole
 - Proposed Ropes Course Area
 - Ropes Course (Adult)
 - Ropes Course (Kids)
 - Zip Line
 - Operative MDC Plan; Rec P zone
 - Areas of Visual Vulnerability (High)

CAD ref: C:\12ds\data\DO-TIMARU\30648 TM - Lakeside Drive, Tekapo 1097\06 CADD\DWG\DOA 30648 Application Plan AP01 C LVD37.dwg

APPENDIX 4 – FLOOD HAZARD ASSESSMENT

11 August 2025

Mark Geddes
Perspective
79 Orbell Street
Timaru 7910

75 Church Street
PO Box 550
Timaru 7940
P. 03 687 7800
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Customer Services
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Dear Mark

**Flood Hazard Assessment – Proposed New Building
0 Lakeside Drive, Tekapo, Lot 5 DP 455053, Valuation No: 25311 023 05**

This property is located on the northeast side of Lakeside Drive near the southwestern shore of Lake Tekapo. The property slopes steadily from Lakeside Drive down to near the lake edge. You propose a non-residential building located near the northern end of the property – refer attached plan.

Environment Canterbury holds no records of flooding having occurred at the proposed site.

Ground level at the proposed building site is at least approximately 800 mm above the design maximum flood level of Lake Tekapo and as such is not considered at risk of flooding from that source.

Environment Canterbury has no information to suggest local runoff is a risk at the proposed site. The property is sloping and freely draining.

There does not appear to be any significant flood risk to the proposed site and Environment Canterbury has no recommendation for the floor level of the building (above that of the Building Act).

I hope this information is of assistance. Please don't hesitate to contact me if you require any clarification.

Yours sincerely



Chris Fauth
Senior Scientist (Natural Hazards)

cc: planning@mackenzie.govt.nz
Mackenzie District Council

Key Ref: 25174
Contact: Chris Fauth

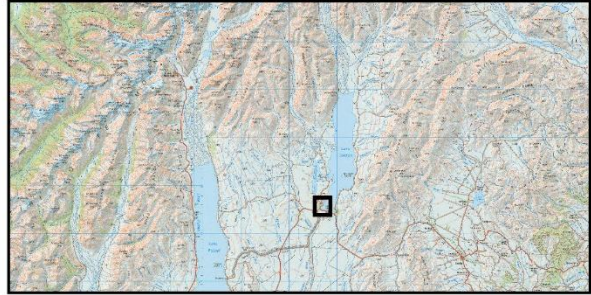
Attachments:

- Topographic map showing location of property
- Aerial photograph of the property
- Site Plan provided by the applicant including ground level contours.

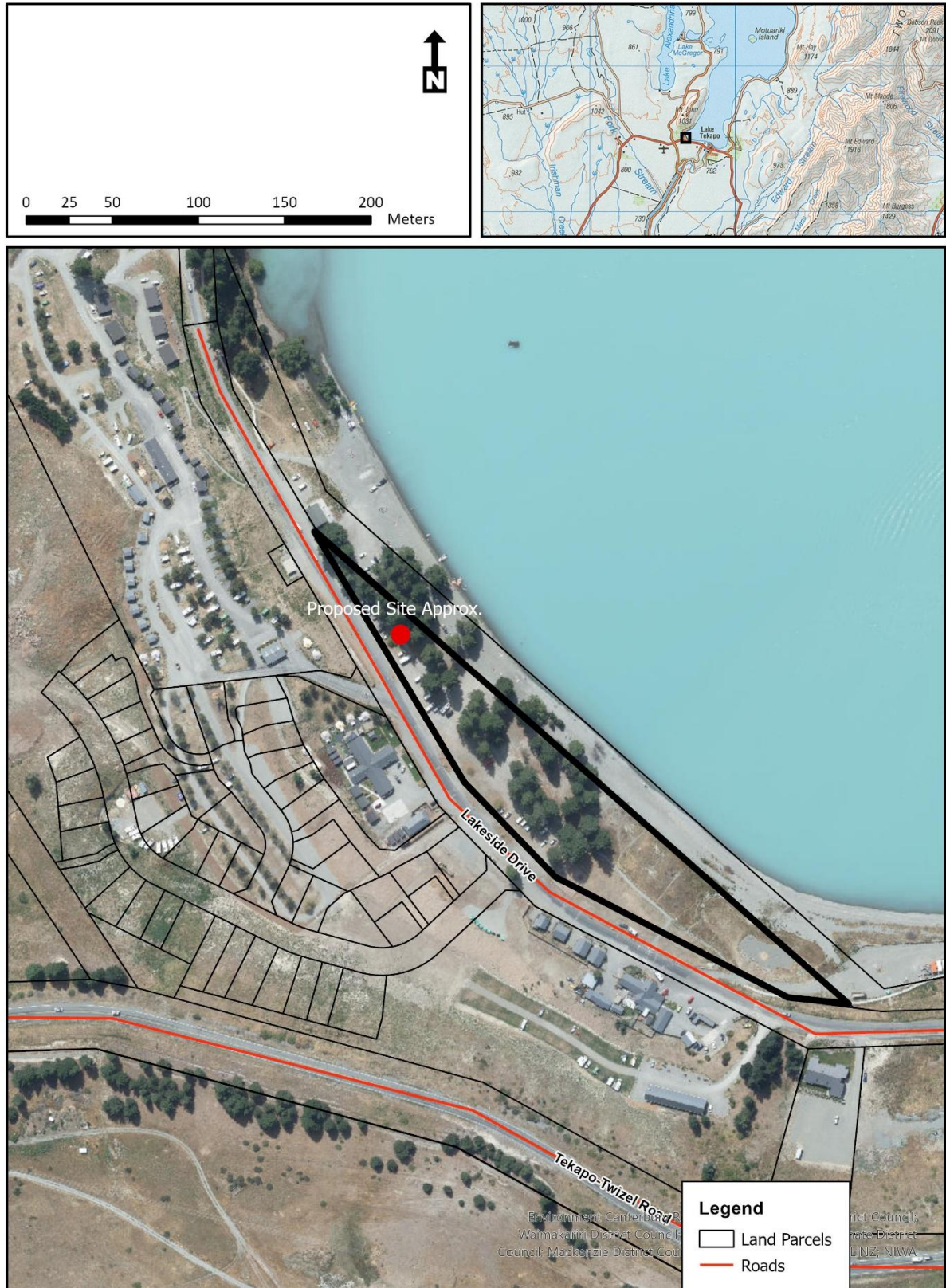
Lakeside Drive, Lake Tekapo



0 100 200 400 600 800
Meters



Lakeside Drive, Lake Tekapo





Survey Datum:
Horizontal: NAD83/2011, Timaru Circuit
Vertical: Lyttelton Vertical Datum 1937

Origin Point: MN 8 DP 351127
Easting: 353000.719 mE
Northing: 843784.571 mN
RI: 746.31 mH

Keywords: child sexual abuse, child sexual exploitation, child sexual abuse, child sexual exploitation, child sexual abuse, child sexual exploitation

- All dimensions in metres unless otherwise specified.
- Survey Completed by Malvin Honey and Zebian Lacey on the 24/04/2024
- Surveyed by RPS RTK G514, westward 1515
- 12100983, 12100968 and Lake 1515 Rubric. Total Station SW 6 1625.59
- Height transferred using GNSS
- Existing boundaries adopted from GMP Define
- Boundary dimensions and areas as per outline
- Aerial Photography: <https://bairnsmapz.liv.gov.au/>
- Data created by Gimp on 10/03/2023.
- For dimensions, areas, easement, covenants and consent notice information, refer to Lnts 2 & 5 OP 45205, L 584160 and LIT 999813
- Major contours shown at 10m intervals
- Existing services shown as per GMP
- Existing services shown are based off MDC's GIS records and should be treated as indicative only
- Visible service at ground level was picked up as per the survey, a full assessment of underground
- Existing services are located within the proposed works area, including services not necessarily shown on this plan. It is the Contractor's responsibility to locate and protect all existing services including but not limited to: water, sewer, gas, electricity, Council Land Drainage

Wang

- Fence
 Building Line
 Bottom of bank
 Tree with diameter (DBH)
 Swamp
 Foul Sewer manhole
 Stormwater manhole
 Lamp pole
 Proposed Ropes Course Area
 Ropes Course (Adult)
 Ropes Course (Kids)
 Zip Line

Advertisement for *Levi's®* jeans.

OPERATIVE AND PLASTIC SURGERY

Areas of Visual Vulnerability (High)

1000

Design	Distance	Q4 (ft)	Q5 (ft)
1	10	10	10
2	20	20	20
3	30	30	30
4	40	40	40
5	50	50	50
6	60	60	60
7	70	70	70
8	80	80	80
9	90	90	90
10	100	100	100

5	71	
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姓名	性别	年龄	职业	住址
张三	男	35	教师	北京市朝阳区
李四	女	28	医生	北京市海淀区
王五	男	42	工程师	上海市浦东新区
赵六	女	31	公务员	广东省广州市
孙七	男	25	学生	浙江省杭州市
周八	女	38	经理	北京市西城区
吴九	男	45	农民	河南省郑州市
郑十	女	33	护士	四川省成都市
陈十一	男	29	程序员	广东省深圳市
林十二	女	36	律师	北京市东城区
周十三	男	41	会计师	上海市黄浦区
吴十四	女	34	作家	江苏省南京市
郑十五	男	27	设计师	浙江省宁波市
陈十六	女	39	教授	北京市昌平区
林十七	男	43	企业家	广东省东莞市
周十八	女	32	记者	上海市静安区
吴十九	男	46	科学家	北京市海淀区
郑二十	女	37	艺术家	北京市丰台区
陈二十一	男	30	翻译	上海市虹口区
林二十二	女	40	心理咨询师	北京市石景山区
周二十三	男	26	产品经理	广东省佛山市
吴二十四	女	35	市场专员	浙江省温州市
郑二十五	男	44	项目经理	北京市顺义区
陈二十六	女	33	人力资源	上海市徐汇区
林二十七	男	28	数据分析师	广东省珠海市
周二十八	女	36	运营专员	浙江省嘉兴市
吴二十九	男	41	销售主管	北京市通州区
郑三十	女	34	客服经理	上海市杨浦区
陈三十一	男	29	培训师	广东省惠州市
林三十二	女	38	行政助理	北京市大兴区
周三十三	男	43	IT支持	上海市嘉定区
吴三十四	女	32	财务专员	浙江省绍兴市
郑三十五	男	45	仓库主管	北京市怀柔区
陈三十六	女	30	质检员	上海市金山区
林三十七	男	37	物流专员	广东省中山市
周三十八	女	42	采购经理	浙江省金华市
吴三十九	男	27	销售助理	北京市密云区
郑四十	女	35	市场专员	上海市崇明区
陈四十一	男	40	培训师	广东省汕头市
林四十二	女	33	行政助理	北京市平谷区
周四十三	男	28	IT支持	上海市奉贤区
吴四十四	女	36	财务专员	浙江省衢州市
郑四十五	男	41	仓库主管	北京市延庆区
陈四十六	女	30	质检员	上海市浦东新区
林四十七	男	37	物流专员	广东省江门市
周四十八	女	42	采购经理	浙江省台州市
吴四十九	男	27	销售助理	北京市门头沟区
郑五十	女	35	市场专员	上海市宝山区
陈五十一	男	40	培训师	广东省茂名市
林五十二	女	33	行政助理	北京市房山区
周五十三	男	28	IT支持	上海市闵行区
吴五十四	女	36	财务专员	浙江省丽水市
郑五十五	男	41	仓库主管	北京市昌平区
陈五十六	女	30	质检员	上海市虹口区
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林七十二	男	37	物流专员	广东省肇庆市
周七十二	女	42	采购经理	浙江省金华市
吴七十二	男	27	销售助理	

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Ropes Course - Lake Tekapo
Lot 2 DP 562455 & Lot 5 DP 455053

QCP Limited
Lakeside Drive, Lake Tekapo

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