



A. Permission Application Number and Name of Applicant **SUB 401**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Rebecca Bland
Organisation	
Date	09.12.24

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

My reasons for my objection or submission are:

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

How do I submit my objection or submission?

Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.

OBJECTION OR SUBMISSION

OBJECTION OR SUBMISSION

A. Permission Application Number and Name of Applicant

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter

Organisation

Deborah Gibbs

Date

9.2.24

D. Statement of Support, Neutrality or Opposition

I **Support** this Application (I am making a submission)

I am **Neutral** on this Application (I am making a submission).

I **Oppose** this Application (I am making an objection).

E. Hearing Request

I **Do Not** wish to be heard in support of this objection or submission at a hearing.

I **Do** wish to be heard in support of this objection or submission at a hearing

Permissions Application Number 109883-SKI

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

All parts. I **support** the granting of concessions to Pure Turoa Ltd.

My reasons for my objection or submission are:

I **support** the granting of concessions to Pure Turoa Ltd because:

- We have strong personal and family connections to the mountains of Tongariro National Park going back to 1978, and we enjoy skiing/snowboarding, tramping and mountaineering as forms of recreation together with our family and many of our friends. We are regular and respectful visitors to TNP and being there is one of our favourite things to do.
- As noted on p35 of the Tongariro National Park Management Plan (2006) Mt Ruapehu is ‘nationally important’ for skiing as it is the only place in the North Island where lift-serviced alpine snowsports can be provided (notwithstanding a small club field at Taranaki). Given the failure of Ruapehu Alpine Lifts, it is important to ensure that another entity takes over immediately. Snow sports account for about half of all TNP visitors according to the TNPMP.
- The proposal is within the amenity area of Turoa Ski Area identified in the TNPMP and is generally consistent with the TNPMP’s objectives.
- Granting the concession would **foster recreation** and therefore be consistent with section 6(e) of the Conservation Act, which states:
“to the extent that the use of any natural or historic resource for

recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism.”

- While there are reasons to consider delaying the granting of concessions until after Te Tiriti o Waitangi claims have been settled, I believe that the applicant’s growing relationship with Ngāti Rangī and others, combined with the relatively short term sought (compared with the current RAL concession’s 60 years) and the proposal to eventually remove and replace the Ngā Wai Heke, Park Lane and Giant lifts with one gondola or high capacity chair with a mid-station, plus the fact that the infrastructure will be damaged by ice if not operated each winter, mean granting the concession now and then working with iwi collaboratively is the best approach.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I submit that the Department of Conservation:

- **Grant the concessions sought by Pure Turoa Ltd to operate Turoa Ski Area**

- Consider how the term of the concession can be extended to provide sufficient time for payback of the capital investment required to remove and replace some of the lifts as shown in the indicative development plan, while also respecting and providing for collaboration with Ngāti Rangī and any other relevant iwi so that the outcomes of their treaty settlement can be recognised and provided for by the applicant and DOC when the time comes.

- Note that climate change will potentially render commercial ski areas on Mt Ruapehu economically unviable at some point during this century if the 2,300m elevation remains the upper limit for development, so allowing lift development in the 1,900m – 2,300m zone within the current ski area boundary may be desirable to ensure that popular and

rewarding lift- serviced alpine snow sports can continue on the maunga for as long as possible.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 403**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	John Laurenson
Organisation	Ossies Motel
Date	9 feb 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Ownership and operation of the Turoa Skifields to be independent of Whakapapa

My reasons for my objection or submission are:

In recent years we have seen several negative effects on our business and the Ohakune township in general as a result of the combined RAL ownership.

To cite some examples

- 1- The original intention to open the Turoa side after the school holidays last year was unbelievable for several reasons.
- 2- The decision to offer no beginner facilities on the Turoa side in an earlier year had huge negative effects and again hard to believe.
- 3- An apparent coordinated opening of one side only at times.
- 4- Unwillingness to allow timed racing on the Turoa side impacted on events like North Island Secondary Schools Skiing and Boarding competitions and ultimately where the teams chose to stay.

Whilst I could give further examples these are sufficient to give our whole hearted support for the Pure Turoa Application.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Simply want Turoa owned/operated independent of Whakapapa.

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A. Permission Application Number and Name of Applicant SUB 404

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter

Tim Tries

Organisation

Date

9 February 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I oppose the concession - specifically

- removal of lifts and the additional footprint of new lifts that have been proposed
- the privatisation of a ski field in a dual heritage/national park, potentially limiting other users ability to access the mountain
- the short time frame of the applied for concession
- lack of information on the skills, experience and financial viability of PTL
- redacted, hidden information
- only one side being sold with no actual plans for the other side

My reasons for my objection or submission are:

I have been skiing this mountain since I was an eight year old, almost 40 years now. National Parks are for the use and enjoyment of all kiwis and in my opinion designed to encourage outdoor education and experiences. As a non profit, community model this is exactly what has happened. Families have enjoyed the use and had new memorable experiences in this beautiful national park. It is my firm opinion that privatising this field and reducing the skiing capacity will limit the opportunity for the average kiwi or international visitor to enjoy the area. The talk around charging parking fees are also concerning and proved a frustration during the covid disruption.

Why is this process being rushed through? The TNP treaty settlement will be happening in the next couple years...a sale prior to this is disrespectful to iwi and the local community. Giving the field away for a dollar is even more disrespectful. PTL have stated they have iwi support, but I am yet to see any verified report from iwi on this. All iwi conversation points have been redacted.

Reducing the number of lifts will create greater congestion and damage to the local environment and enjoyment of users. What guarantees are in place to ensure that these corporate raiders don't just milk profits, strip assets and leave us another "chateau tongariro"? NONE!!!

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Stop the privatisation of the ski fields, keep to a community owned model for the use, enjoyment and benefit of the community. Stop trying to rush things through and gift a private company millions of dollars worth of assets for \$1. Undertake proper due diligence, don't remove the lifts. Keep the mountain available to all users, not just the rich that can afford whatever high prices and limitations that PTL are going to impose. Engage properly with iwi and delay this process until after the Tongariro National Park treaty claims are settled.

No need to waste tax payer money on DOC removing lifts....this should remain as a make good clause for any owner/operator....otherwise there is nothing stopping a cash grab from private individuals looking to make some easy money.

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A. Permission Application Number and Name of Applicant **SUB 405**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	John Laurenson
Organisation	The Laurenson Trust
Date	9 Feb 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Operation of Turoa Skifield independent from Whakapapa

My reasons for my objection or submission are:

The Laurenson Trust is a non-profit trust set up primarily to benefit Ruapehu College Students. Part of the Laurenson Trust operation involves the co-ordinating of both the North Island Secondary Schools Skiing and Snowboarding competitions. I have been involved with these events since we first started 44 years ago in 1980. At that point it was a three way partnership between Ruapehu College, Turoa Skifield and the Ohakune township. The original skiing competition grew to well over 500 competitors and eventually we started a stand alone Snowboarding event along similar lines. Although we had some reservations at the time of the RAI takeover, things progressed along ok with Sec 9(2)(a) at the helm. Once he departed and in recent years however the monopoly has been hugely detrimental to the competition. There was a clear attempt to move the event to the Whakapapa side. RAL would not allow any timing on the Turoa side thereby forcing our hand. In the most recent years we have had covid, lack of snow and the recent financial issues preventing us running for four consecutive years. We had also been faced with ever increasing costs from RAL where we have no redress. I fully believe that if Turoa was independently operated we would be back to a truly competitive market and we would possibly be able to return to how we originally started. My fellow trustees fully support the Pure Turoa application.

The outcomes that need to be addressed by this application are:
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I would be interested to hear what priority Pure Turoa would give to reintroducing ski racing options.

G. Attachments

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A. Permission Application Number and Name of Applicant SUB 406

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Myles Perry
Organisation	
Date	09 February 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Overall and Term in particular

My reasons for my objection or submission are:

My family and I are skiers Sec 9(2)(a). We are very keen to see skiing continue on Mt Ruapehu. Skiing is an activity which is beneficial for the wellbeing of the participants and is critical for the economy of the region.

I can understand that PTL needs to work collaboratively with and respect the wishes of local iwi particularly given the cultural significance of the mountain. However, I am concerned as a user of the skiing facilities about the length of concession. RAL was granted a 25 year concession in 2017, i.e. through to 2047, with 7 rights of renewal, through to 2077. Whereas, PTL are applying for a 10 year concession, i.e. through to 2034,, with an option to extend another 20 years with 5 year reviews, i.e. through to 2054. The reason for my concern is ski operations are a capital intensive and I worry that it will be hard for PTL to adequately fund capital projects without a longer guaranteed pay-back period. To be honest I do not fully understand the certainty of the 20 year extension and how funders would perceive this risk.

I am sure that PTL have carefully considered this matter and have agreed to a proposed concession that they feel is commercially sustainable whilst balancing the needs and wishes of key stakeholders, however I wished to share my thoughts.

At this stage it appears that PTL is the only option available for continuing ski operations at Turoa and I therefore fully support them. However, I note that as a skier over the next ten years PTL's plan to reduce skiing capacity and skiing footprint compared to the current RAL operation / concession. If this in reality is the only way of securing the future of skiing at Turoa then I accept and understand this, but it is disappointing as a skier.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

My preference would be for term to be longer.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 407**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter

Lynette Demler

Organisation

Date

09/02/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. The duration of the concession is only 10 years.
2. The Tongariro National Park (TNP) treaty claim(s) have not been negotiated or settled.
3. Not enough information to know if Pure Tūroa Limited (PTL) will be financially sound.
4. The decreased access to the mountain if the concession is awarded.
5. The concession excludes wider alpine snow sports assets on Mt Ruapehu, specifically Whakapapa.
6. Compressed negotiation and consultation period.
7. Redaction of important information, including parties involved and consulted.

My reasons for my objection or submission are:

1. There currently remains an existing concession on the site of 60 years.

The short length of the concession sought indicates a clear lack of a long-term commitment to the operation, to the wider area and opens the door for asset stripping and an imbalance between commercial priorities and public interest. Environmentally, the longer the commitment to a place, the more invested a party is in the sustainability of a place. The PTL concession falls short on this front.

2. Tongariro National Park (TNP) treaty claim(s) may lead to immediate litigation costs.

The well publicised interests of other parties (including those under a Treaty claim) in the existing concession and RAL assets mean that should this PTL concession be awarded at this time, there is high risk of conflict and subsequent litigation which will bleed resources which could otherwise be used to enable and ensure equitable access to the assets and the ski field.

3. It is difficult to tell if the business will be financially viable.

Appendix 7 cash flow model makes it difficult to tell if the business makes commercial sense.

Information provided excludes information on what DoC and MBIE will need to pay to remove infrastructure from the mountain if the business fails.

4. Increased costs and decreased mountain capacity will make Tūroa less accessible to New Zealanders.

The reduction in capacity with the removal of the Nga Wai Heke chair, Giant Chair, and the Wintergarden Platter and less operational days, longer inactive vs active time on the mountain and lowered accessibility to the Maunga during the operating season. The lower capacity of 4500 would see increased demand, leading to price increases which will take the cost of utilising this natural resource beyond the reach of most New Zealanders.

5. Competing business interests with Whakapapa and lack of complementary business operation.

A lack of synergy between the other snow sports assets on Mt Ruapehu lowers the chance of mitigating partial operational closure across the Maunga – further reducing access for those who have travelled some distance to stay and experience the thrill and majesty of Mt Ruapehu.

6. Past concessions negotiations took around four years.

The short period of time between the consultation period and opening of the 2024 season means that there cannot be full consideration of important aspects.

7. Key information has not been provided.

The extensive redaction of names (e.g. Directors of PTL), this information is a matter of public record and should not be redacted.

Iwi engagement has been completely redacted.

The outcomes that need to be addressed by this application are:
 Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Any concession needs to be for a longer period of time (minimum 30 years).

Any concession needs to show partnership and/or endorsement from mana whenua. Cease ignoring iwi and retract from seeking new concessions, as they have said they will not approve new concessions until Treaty claims are settled on the Maunga.

Keeping the existing RAL concession in place provides a safe working relationship while the TNP treaty claims are being negotiated between the Government and various iwi interests over coming years.

Any concession should be for the whole mountain, being Whakapapa and Tūroa.

Any concession needs to show active consideration of ongoing accessibility (including socio-economic) to the Operation within this National Park. Especially as a non-profit operator is seen as being more compatible with public access to a National Park environment.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 408**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Andrew Holroyd
Organisation	Individual
Date	9 February 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The issue of a lease and license to operate the Turoa Ski field area as a separate entity to the Whakapapa Ski field area.

The development plan for Turoa Ski field, in particular the removal of the Giant chair lift.

The crowd funding for development purposes.

My reasons for my objection or submission are:

The Whakapapa and Turoa Ski fields have been operated under the same management for many years and the two ski fields complement each other. When weather conditions are bad on one side of the mountain they are often more favourable on the other side of the mountain. The ability to buy a season pass to cover both areas allows for a more sustainable skiing experience. The six monthly report from the liquidators recently issued indicated that RAL operating under the direction of the liquidators made a profit for the previous financial year.

Pure Turoa should be required to review the financial statements and indicate provide a compelling reason for separating the two ski fields. The summer revenue from the Whakapapa ski field should be able to support the ability for the two ski fields to remain operational for a longer period of time than one on its own.

The development plan indicates the upgrading of the Movenpick chair lift and the removal of the Park Lane chairlift and the removal of the Wintergarden platter, which I can understand with the extension of the alpine meadow area giving easier access for beginners at a lower altitude.

The removal of the giant chair lift will leave the skiable area of the mountain significantly reduced.

This will mean that when it is not possible to ski all the way to the bottom of the Movenpick chair lift the ski area will be reduced to skiing the High Noon Express only and skiing back to the top of the Movenpick chair to get down the mountain. With the Giant chair in place there will be a transition from skiing the whole of the field to being able to ski 70% of the field rather than only being left to ski 25% of the ski area from the High Noon Express.

This is the same situation that has occurred at Whakapapa when the Skywhaka was installed and the waterfall chair was removed. The waterfall chair lift was probably the most used chair lift for intermediate and competent skiers. The removal of the Giant Chair will impact on the enjoyment of the Turoa Ski field for the purposes of skiing.

The other main objection is that the development plans are based on profit and crowd funding.

I can only assume that the crowd funding will be similar to that carried out for the Whakapapa Ski field where life passes were sold. I am not opposed to the crowd funding option but as a life pass holder, who has had no control over the direction the combined ski fields have taken in the past I believe there would have to be more stringent controls over the operation and rights of the funding option.

I am very keen to see the future operation of the ski fields in the National Park and the longevity of the skiing operations.

The liquidators have managed to operate the combined ski fields in a manageable format and with the summer visitors using the SkyWhaka there is a more sustainable future in sight. It was an unforeseeable set of international and national events that pushed RAL into liquidation. Now that the situation is returning to a more foreseeable future the department of conservation needs to look at both ski fields together not in isolation.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The application should be combined with an application for the Whakapapa Ski field to keep both Ski fields under the same management.

The Giant Chair lift should remain part of the long term development plan and not be removed to provide access to the ski area.

A clearer format for how development costs will be sourced. Is the crowd funding going to constitute the sale of Pure Turoa Shares. This needs to be explained in more detail within the proposal.

G. Attachments

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A. Permission Application Number and Name of Applicant SUB 409

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Andrew Holroyd
Organisation	Individual
Date	9 February 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The issue of a lease and license to operate the Turoa Ski field area as a separate entity to the Whakapapa Ski field area.

The development plan for Turoa Ski field, in particular the removal of the Giant chair lift.

The crowd funding for development purposes.

My reasons for my objection or submission are:

The Whakapapa and Turoa Ski fields have been operated under the same management for many years and the two ski fields complement each other. When weather conditions are bad on one side of the mountain they are often more favourable on the other side of the mountain. The ability to buy a season pass to cover both areas allows for a more sustainable skiing experience. The six monthly report from the liquidators recently issued indicated that RAL operating under the direction of the liquidators made a profit for the previous financial year.

Pure Turoa should be required to review the financial statements and indicate provide a compelling reason for separating the two ski fields. The summer revenue from the Whakapapa ski field should be able to support the ability for the two ski fields to remain operational for a longer period of time than one on its own.

The development plan indicates the upgrading of the Movenpick chair lift and the removal of the Park Lane chairlift and the removal of the Wintergarden platter, which I can understand with the extension of the alpine meadow area giving easier access for beginners at a lower altitude.

The removal of the giant chair lift will leave the skiable area of the mountain significantly reduced.

This will mean that when it is not possible to ski all the way to the bottom of the Movenpick chair lift the ski area will be reduced to skiing the High Noon Express only and skiing back to the top of the Movenpick chair to get down the mountain. With the Giant chair in place there will be a transition from skiing the whole of the field to being able to ski 70% of the field rather than only being left to ski 25% of the ski area from the High Noon Express.

This is the same situation that has occurred at Whakapapa when the Skywhaka was installed and the waterfall chair was removed. The waterfall chair lift was probably the most used chair lift for intermediate and competent skiers. The removal of the Giant Chair will impact on the enjoyment of the Turoa Ski field for the purposes of skiing.

The other main objection is that the development plans are based on profit and crowd funding.

I can only assume that the crowd funding will be similar to that carried out for the Whakapapa Ski field where life passes were sold. I am not opposed to the crowd funding option but as a life pass holder, who has had no control over the direction the combined ski fields have taken in the past I believe there would have to be more stringent controls over the operation and rights of the funding option.

I am very keen to see the future operation of the ski fields in the National Park and the longevity of the skiing operations.

The liquidators have managed to operate the combined ski fields in a manageable format and with the summer visitors using the SkyWhaka there is a more sustainable future in sight. It was an unforeseeable set of international and national events that pushed RAL into liquidation. Now that the situation is returning to a more foreseeable future the department of conservation needs to look at both ski fields together not in isolation.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The application should be combined with an application for the Whakapapa Ski field to keep both Ski fields under the same management.

The Giant Chair lift should remain part of the long term development plan and not be removed to provide access to the ski area.

A clearer format for how development costs will be sourced. Is the crowd funding going to constitute the sale of Pure Turoa Shares. This needs to be explained in more detail within the proposal.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

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A. Permission Application Number and Name of Applicant **SUB 410**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Andrew Holroyd
Organisation	Individual
Date	9 February 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The issue of a lease and license to operate the Turoa Ski field area as a separate entity to the Whakapapa Ski field area.

The development plan for Turoa Ski field, in particular the removal of the Giant chair lift.

The crowd funding for development purposes.

My reasons for my objection or submission are:

The Whakapapa and Turoa Ski fields have been operated under the same management for many years and the two ski fields complement each other. When weather conditions are bad on one side of the mountain they are often more favourable on the other side of the mountain. The ability to buy a season pass to cover both areas allows for a more sustainable skiing experience. The six monthly report from the liquidators recently issued indicated that RAL operating under the direction of the liquidators made a profit for the previous financial year.

Pure Turoa should be required to review the financial statements and indicate provide a compelling reason for separating the two ski fields. The summer revenue from the Whakapapa ski field should be able to support the ability for the two ski fields to remain operational for a longer period of time than one on its own.

The development plan indicates the upgrading of the Movenpick chair lift and the removal of the Park Lane chairlift and the removal of the Wintergarden platter, which I can understand with the extension of the alpine meadow area giving easier access for beginners at a lower altitude.

The removal of the giant chair lift will leave the skiable area of the mountain significantly reduced.

This will mean that when it is not possible to ski all the way to the bottom of the Movenpick chair lift the ski area will be reduced to skiing the High Noon Express only and skiing back to the top of the Movenpick chair to get down the mountain. With the Giant chair in place there will be a transition from skiing the whole of the field to being able to ski 70% of the field rather than only being left to ski 25% of the ski area from the High Noon Express.

This is the same situation that has occurred at Whakapapa when the Skywhaka was installed and the waterfall chair was removed. The waterfall chair lift was probably the most used chair lift for intermediate and competent skiers. The removal of the Giant Chair will impact on the enjoyment of the Turoa Ski field for the purposes of skiing.

The other main objection is that the development plans are based on profit and crowd funding.

I can only assume that the crowd funding will be similar to that carried out for the Whakapapa Ski field where life passes were sold. I am not opposed to the crowd funding option but as a life pass holder, who has had no control over the direction the combined ski fields have taken in the past I believe there would have to be more stringent controls over the operation and rights of the funding option.

I am very keen to see the future operation of the ski fields in the National Park and the longevity of the skiing operations.

The liquidators have managed to operate the combined ski fields in a manageable format and with the summer visitors using the SkyWhaka there is a more sustainable future in sight. It was an unforeseeable set of international and national events that pushed RAL into liquidation. Now that the situation is returning to a more foreseeable future the department of conservation needs to look at both ski fields together not in isolation.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The application should be combined with an application for the Whakapapa Ski field to keep both Ski fields under the same management.

The Giant Chair lift should remain part of the long term development plan and not be removed to provide access to the ski area.

A clearer format for how development costs will be sourced. Is the crowd funding going to constitute the sale of Pure Turoa Shares. This needs to be explained in more detail within the proposal.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 411**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Andrew Holroyd
Organisation	Individual
Date	9 February 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The issue of a lease and license to operate the Turoa Ski field area as a separate entity to the Whakapapa Ski field area.

The development plan for Turoa Ski field, in particular the removal of the Giant chair lift.

The crowd funding for development purposes.

My reasons for my objection or submission are:

The Whakapapa and Turoa Ski fields have been operated under the same management for many years and the two ski fields complement each other. When weather conditions are bad on one side of the mountain they are often more favourable on the other side of the mountain. The ability to buy a season pass to cover both areas allows for a more sustainable skiing experience. The six monthly report from the liquidators recently issued indicated that RAL operating under the direction of the liquidators made a profit for the previous financial year.

Pure Turoa should be required to review the financial statements and indicate provide a compelling reason for separating the two ski fields. The summer revenue from the Whakapapa ski field should be able to support the ability for the two ski fields to remain operational for a longer period of time than one on its own.

The development plan indicates the upgrading of the Movenpick chair lift and the removal of the Park Lane chairlift and the removal of the Wintergarden platter, which I can understand with the extension of the alpine meadow area giving easier access for beginners at a lower altitude.

The removal of the giant chair lift will leave the skiable area of the mountain significantly reduced.

This will mean that when it is not possible to ski all the way to the bottom of the Movenpick chair lift the ski area will be reduced to skiing the High Noon Express only and skiing back to the top of the Movenpick chair to get down the mountain. With the Giant chair in place there will be a transition from skiing the whole of the field to being able to ski 70% of the field rather than only being left to ski 25% of the ski area from the High Noon Express.

This is the same situation that has occurred at Whakapapa when the Skywhaka was installed and the waterfall chair was removed. The waterfall chair lift was probably the most used chair lift for intermediate and competent skiers. The removal of the Giant Chair will impact on the enjoyment of the Turoa Ski field for the purposes of skiing.

The other main objection is that the development plans are based on profit and crowd funding.

I can only assume that the crowd funding will be similar to that carried out for the Whakapapa Ski field where life passes were sold. I am not opposed to the crowd funding option but as a life pass holder, who has had no control over the direction the combined ski fields have taken in the past I believe there would have to be more stringent controls over the operation and rights of the funding option.

I am very keen to see the future operation of the ski fields in the National Park and the longevity of the skiing operations.

The liquidators have managed to operate the combined ski fields in a manageable format and with the summer visitors using the SkyWhaka there is a more sustainable future in sight. It was an unforeseeable set of international and national events that pushed RAL into liquidation. Now that the situation is returning to a more foreseeable future the department of conservation needs to look at both ski fields together not in isolation.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The application should be combined with an application for the Whakapapa Ski field to keep both Ski fields under the same management.

The Giant Chair lift should remain part of the long term development plan and not be removed to provide access to the ski area.

A clearer format for how development costs will be sourced. Is the crowd funding going to constitute the sale of Pure Turoa Shares. This needs to be explained in more detail within the proposal.

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A. Permission Application Number and Name of Applicant **SUB 412**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Andrew Holroyd
Organisation	Individual
Date	9 February 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

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The development plan for Turoa Ski field, in particular the removal of the Giant chair lift.

The crowd funding for development purposes.

My reasons for my objection or submission are:

The Whakapapa and Turoa Ski fields have been operated under the same management for many years and the two ski fields complement each other. When weather conditions are bad on one side of the mountain they are often more favourable on the other side of the mountain. The ability to buy a season pass to cover both areas allows for a more sustainable skiing experience. The six monthly report from the liquidators recently issued indicated that RAL operating under the direction of the liquidators made a profit for the previous financial year.

Pure Turoa should be required to review the financial statements and indicate provide a compelling reason for separating the two ski fields. The summer revenue from the Whakapapa ski field should be able to support the ability for the two ski fields to remain operational for a longer period of time than one on its own.

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The removal of the giant chair lift will leave the skiable area of the mountain significantly reduced.

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I can only assume that the crowd funding will be similar to that carried out for the Whakapapa Ski field where life passes were sold. I am not opposed to the crowd funding option but as a life pass holder, who has had no control over the direction the combined ski fields have taken in the past I believe there would have to be more stringent controls over the operation and rights of the funding option.

I am very keen to see the future operation of the ski fields in the National Park and the longevity of the skiing operations.

The liquidators have managed to operate the combined ski fields in a manageable format and with the summer visitors using the SkyWhaka there is a more sustainable future in sight. It was an unforeseeable set of international and national events that pushed RAL into liquidation. Now that the situation is returning to a more foreseeable future the department of conservation needs to look at both ski fields together not in isolation.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The application should be combined with an application for the Whakapapa Ski field to keep both Ski fields under the same management.

The Giant Chair lift should remain part of the long term development plan and not be removed to provide access to the ski area.

A clearer format for how development costs will be sourced. Is the crowd funding going to constitute the sale of Pure Turoa Shares. This needs to be explained in more detail within the proposal.

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A. Permission Application Number and Name of Applicant SUB 413

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Andrew Holroyd
Organisation	Individual
Date	9 February 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

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The development plan for Turoa Ski field, in particular the removal of the Giant chair lift.

The crowd funding for development purposes.

My reasons for my objection or submission are:

The Whakapapa and Turoa Ski fields have been operated under the same management for many years and the two ski fields complement each other. When weather conditions are bad on one side of the mountain they are often more favourable on the other side of the mountain. The ability to buy a season pass to cover both areas allows for a more sustainable skiing experience. The six monthly report from the liquidators recently issued indicated that RAL operating under the direction of the liquidators made a profit for the previous financial year.

Pure Turoa should be required to review the financial statements and indicate provide a compelling reason for separating the two ski fields. The summer revenue from the Whakapapa ski field should be able to support the ability for the two ski fields to remain operational for a longer period of time than one on its own.

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This is the same situation that has occurred at Whakapapa when the Skywhaka was installed and the waterfall chair was removed. The waterfall chair lift was probably the most used chair lift for intermediate and competent skiers. The removal of the Giant Chair will impact on the enjoyment of the Turoa Ski field for the purposes of skiing.

The other main objection is that the development plans are based on profit and crowd funding.

I can only assume that the crowd funding will be similar to that carried out for the Whakapapa Ski field where life passes were sold. I am not opposed to the crowd funding option but as a life pass holder, who has had no control over the direction the combined ski fields have taken in the past I believe there would have to be more stringent controls over the operation and rights of the funding option.

I am very keen to see the future operation of the ski fields in the National Park and the longevity of the skiing operations.

The liquidators have managed to operate the combined ski fields in a manageable format and with the summer visitors using the SkyWhaka there is a more sustainable future in sight. It was an unforeseeable set of international and national events that pushed RAL into liquidation. Now that the situation is returning to a more foreseeable future the department of conservation needs to look at both ski fields together not in isolation.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The application should be combined with an application for the Whakapapa Ski field to keep both Ski fields under the same management.

The Giant Chair lift should remain part of the long term development plan and not be removed to provide access to the ski area.

A clearer format for how development costs will be sourced. Is the crowd funding going to constitute the sale of Pure Turoa Shares. This needs to be explained in more detail within the proposal.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 414**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Campbell McLeod
Organisation	
Date	9 th February 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

My submission relates to Pure Turoa’s application for the lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

My reasons for my objection or submission are:

The first time I skied Tūroa was with my mother when I was 10 years old. We took the day off school and drove to the mountain. From what I can recall there was not a cloud in the sky for the whole drive. That was a special day for me and planted a seed for my passion in snow sports which I discovered later in life. A memory that I cherish.

Sec 9(2)(a)

The memories & friendships I made up the mountain were priceless. I’m so grateful for what Tūroa has given me.

I am making this submission in the hope that others get the opportunity to experience what I did. Most days I catch myself thinking about my time in the mountains. Not only is it important for north island skiers to have easier access to the sport they love, but also the local economy. There are so many jobs created by a ski season and I fear what will happen to the central plateau if Tūroa goes away. It’s such a beautiful part of our country.

Thank you for considering my submission.

Campbell.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The outcomes needed to be addressed is a lease and license for Pure Tūroa to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this ‘objection or submission form’.

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A. Permission Application Number and Name of Applicant **SUB 415**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Nicholas Grove
Organisation	
Date	9/2/2024

D. Statement of Support, Neutrality or Opposition

I **Support** this Application (I am making a submission)

I am **Neutral** on this Application (I am making a submission).

I **Oppose** this Application (I am making an objection).

E. Hearing Request

I **Do Not** wish to be heard in support of this objection or submission at a hearing.

I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. The treaty claims for the Tongariro Nation Park have not been resolved/settled/negotiated and these claims include the Turoa Ski Field area.
2. There has been a short consultation and negotiation period
3. Redacted information, including that of parties involved and consulted, is important to assess the submission.
4. Can't determine from the information supplied if Pure Turoa Limited will be financially sound
5. The duration of the concession is only 10 years
6. The concession excludes wider alpine snow sports assets on Mt Ruapehu, specifically Whakapapa.
7. The decreased access to the mountains if the concession is awarded.

My reasons for my objection or submission are:

1. Tongariro National Park (TNP) treaty claim(s) may lead to immediate litigation costs.

The well publicised interests of other parties (including those under a Treaty claim) in the existing concession and RAL assets mean that should this PTL concession be awarded at this time, there is high risk of conflict and subsequent litigation which will bleed resources that could otherwise be used to enable and ensure equitable access to the assets and the ski field.

2. Past concessions negotiations took around four years.

The short period of time between the consultation period and opening of the 2024 season means that there cannot be full consideration of important aspects.

3. Key information has not been provided.

The extensive redaction of names (e.g. Directors of PTL), this information is a matter of public record and should not be redacted.

Iwi engagement has been completely redacted.

4. It is difficult to tell if the business will be financially viable.

Appendix 7 cash flow model makes it difficult to tell if the business makes commercial sense.

Information provided excludes information on what DoC and MBIE will need to pay to remove infrastructure from the mountain if the business fails.

5. There currently remains an existing concession on the site of 60 years.

The short length of the concession sought indicates a clear lack of a long-term commitment to the operation, to the wider area and opens the door for asset stripping and an imbalance between commercial priorities and public interest. Environmentally, the longer the commitment to a place, the more invested a party is in the sustainability of a place. The PTL concession falls short on this front.

6. Competing business interests with Whakapapa and lack of complementary business operation.

A lack of synergy between the other snow sports assets on Mt Ruapehu lowers the chance of mitigating partial operational closure across the Maunga – further reducing access for those who have travelled some distance to stay and experience the thrill and majesty of Mt Ruapehu.

7. Increased costs and decreased mountain capacity will make Tūroa less accessible to New Zealanders.

The reduction in capacity with the removal of the Nga Wai Heke chair, Giant Chair, and the Wintergarden Platter and less operational days, longer inactive vs active time on the mountain and lowered accessibility to the Maunga during the operating season. The lower capacity of 4500 would see increased demand, leading to price increases which will take the cost of utilising this natural resource beyond the reach of most New Zealanders.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Any concession needs to show partnership and/or endorsement from mana whenua. Cease ignoring iwi and retract from seeking new concessions, as they have said they will not approve new concessions until Treaty claims are settled on the Maunga.

Keeping the existing RAL concession in place provides a safe working relationship while the TNP treaty claims are being negotiated between the Government and various iwi interests over coming years.

Any concession needs to be for a longer period of time (minimum 30 years).

Any concession should be for the whole mountain, being Whakapapa and Tūroa.

Any concession needs to show active consideration of ongoing accessibility (including socio-economic) to the Operation within this National Park. Especially as a non-profit operator is seen as being more compatible with public access to a National Park environment.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 416**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Emily Jones
Organisation	N/A
Date	9/2/24

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The whole application

My reasons for my objection or submission are:

I agree with Pure Turoa's plan of action for the running of Turoa, and I believe this is the way forward.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

N/A

G. Attachments

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C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Keri Aves
Organisation	
Date	9/2/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I wholly support Pure Turoa's bid to operate the skifield on Turoa, Mt Ruapehu. The skifield is critical to our region (Ruapehu) and town's (Ohakune) economy, ski culture and differentiated tourism offering.

My reasons for my objection or submission are:

A viable and thriving skifield on Turoa...
Provides employment for a huge number of people, including local iwi and whanau.
Provides flow-on spending and employment for local businesses.
Enriches the lives of locals, New Zealanders and international visitors by providing access to our maunga, our National Park and to a vibrant sport enjoyed by so many.
Helps create an economically-viable region that is self-sufficient and thriving
Provides a foundation for future growth opportunities for our region, through possible diversified offerings like sightseeing, hiking, mountain biking, business and visitor growth.
Is a source of pride for locals and kiwis alike – so many have built, developed and enjoyed snowsports on Turoa in the past, and we want to see that investment enjoyed by future generations for years and years to come.

Kiwis are connected to place and nature and maunga. We actively promote being Pure NZ in our tourism. Allowing Pure Turoa to operate the skifield on Turoa continues this connection and helps ensure we thrive as a region and town.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

No changes

G. Attachments

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Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Daniel Fergus
Organisation	
Date	9 th Feb 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

6.6

My reasons for my objection or submission are:

My support relates in the largest form for the continued operation of Turoa Ski Area under Pure Turoa to provide employment and growth to an area of the country I have spent 20+ years in. This is an amazing place to live and work and play and Pure Turoa, I wholeheartedly believe, are the company to maximize this areas potential.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Grant this concession ASAP so Pure Turoa can operated to its full potential.
They are local industry experts and have the passion and skills to run this business successfully.
Their application is thorough and precise and I look forward to being apart of it.

G. Attachments

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Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Nicola Sanders
Organisation	
Date	30/01/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

- 2.2 Proposed Licence and Lease
- 2.5 Planned Upgrades and Replacements
- 3.3 PTL Aspirations
- 3.4 Financial Performance

My reasons for my objection or submission are:

See following pages

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The application must be declined

G. Attachments

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See following pages		

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Permission Application: Pure Tūroa Limited 109883-SKI Attachment to Objection by Nicola Sanders

EXECUTIVE SUMMARY

- 1 It is hard to imagine an application more poorly suited to the long-term financial sustainability of the Tūroa skifield than this one. The specific details of the proposals attached to the application, when viewed in the context of the history of the skifield and its weather patterns, make it perfectly clear that medium-term (and perhaps within an even shorter timeframe) the Tūroa skifield simply will not exist under Pure Tūroa Ltd (PTL) ownership, and may well not exist at all. This goes directly against the Department's duty, in section 6(e) of the Conservation Act 1987, to "...foster the use of natural and historic resources for recreation...".
- 2 Furthermore, there are significant safety concerns arising from a careful reading of their indicative development plan.
- 3 In short, in order to comply with section 6(e) of the Act, the Director-General has no option but to decline the application.

HISTORY OF THE TŪROA SKIFIELD

- 4 The Department will already be well aware of the history of this skifield and in particular, of its various corporate owners. Analysis shows that prior to the purchase by Ruapehu Alpine Lifts (RAL), the skifield was financially viable for an average of less than 10 years each under two owners. Under RAL's not-for-profit ownership this extended to more than 20 years, and was only put in jeopardy due to two years of COVID restrictions on the Auckland skiing public and a further poor snow year.
- 5 Modelling¹ performed by the Ruapehu Skifields Stakeholders' Association (RSSA) in 2023 shows that in fact this is no coincidence: Tūroa skifield is too small, even at its current design carrying capacity of 5,500 visitors, to sustainably operate solo without the advantages of shared overheads with Whakapapa and a portion of that side's summer revenue. Therefore, even without adding constraints on its ability to attract visitors (which PTL is proposing in multiple ways to do), the company's financial sustainability is very much in doubt.
- 6 It is critical that concessionaire(s) for the Ruapehu skifields be financially sustainable in the long-term, since willing investors are not exactly thick on the ground, nor have they ever been. If the concessionaire(s) fail and the skifield(s) close due to lack of subsequent owner(s), a large segment of the North Island public will be denied the opportunity to enjoy the alpine environment. This is thus a very important aspect for the Department to satisfy itself over. Unfortunately, the PTL proposal fails to assure it in several different respects.

SPECIFIC ASPECTS OF THE PURE TŪROA PROPOSALS

- 7 There are a number of troublesome aspects in the PTL proposals:
 - 2.2 Proposed Licence and Lease
 - 2.5 Planned Upgrades and Replacements
 - 3.3 PTL Aspirations
 - 3.4 Financial Performance

2.2 Proposed Licence and Lease

- 8 This section asserts that the Nga Wai Heke chairlift is "now not fit for purpose". The skiing public who have been riding the lift could be forgiven some surprise at this statement, as well as

¹ See Appendix 1

significant concern at its proposed removal. This is an important lift for Tūroa and the entire skifield runs better when it is open.

- 9 "The Glacier" (Mangaehuehu) is regarded by many skiers as the premier lift-accessed back-country terrain on Tūroa; the Nga Wai Heke was installed precisely to support return from it to the in-bounds terrain, so removal of the lift will relegate the Glacier to hiker-only, i.e. a huge decrease in the number of skiers able to access it. Not only will older skiers be denied access, so will families.
- 10 The lift and associated back-country terrain also serve an important role of spreading out crowds on busy days so there will be a concomitant rise in congestion on other lifts and ski trails, impacting both on safety and visitor enjoyment.

2.5 Planned Upgrades and Replacements

- 11 In this section, PTL claim that their plans will "provide high quality skiing experiences ... safer and more enjoyable experiences" but it is hard to imagine this will actually materialise given the 10-year plan detailed in this section.
- 12 There are a number of concerns with this material, many of which revolve around the effects of climate change on snow levels and the unique and extreme weather which all areas on Ruapehu suffer.
- 13 The weather has impacts both on visitors directly (to their persons) and on the lifts, making stoppages and breakdowns more common as well as requiring deicing, all of which in turn have indirect impacts on visitors.
- 14 All of the above must be borne in mind when assessing the PTL planned changes to the skifield.

Lift Removals – Impacts on Visitor Enjoyment

- 15 The proposed removals will result in a "single spine" layout for Tūroa's lifts: the (upgraded/replaced) Movenpick largely for access at least uphill (see point 16), and the High Noon Express for skiing. This latter is hardly the most reliable of lifts, having earned the moniker "the lemon" amongst the staff soon after its installation.
- 16 Expecting that significant numbers of visitors will ski the Movenpick instead of the High Noon Express is simply whistling in the wind. Even assuming sufficient snowbase on the lower mountain trails (which itself is questionable – see point 29), the fact remains that the vast majority of non-beginners want to be on more challenging terrain than this and will not be prepared to confine themselves to the lower trails.
- 17 The "single spine" will thus obviously cause increased congestion on the High Noon Express trails and queuing area, which will be frustrating and unpleasant, especially at those times when skiing to base is impossible and thus there will be zero choice; if one wants to ski, it will be on that lift and on those trails. From RAL's 2011 IDP² we have the following uphill capacities, in persons per hour:

Parklane	1,500
Wintergarden	780
Giant	<u>1,431</u>
Total:	3,711

High Noon Express 3,200

(The Nga Wai Heke did not exist at the date of that report) If we very generously assume that perhaps 25% of those 3,711 skiers are prepared to ski the lower mountain trails because they are less congested (assuming there is snow on them), there will still be nearly 2,800 extra skiers on the High Noon Express – an increase of 87%! It should also be noted that the High Noon Express figure quoted above is its maximum capacity and for varying reasons it often does not run at this rate. Queuing times will thus nearly double, at least.

² See Appendix 2

- 18 Of course, with double the number of skiers waiting for the same chairlift seat and competing for the same trail space, inevitably many will choose to spend their future skiing dollars either at Whakapapa or, in many cases, in the South Island. This will not help PTL's financial sustainability.
- 19 But beyond this, with a single lift at any one altitude any breakdown or deicing problem will instantly rule out any skiing at that level whatsoever. Given the extremes of weather which Ruapehu regularly suffers, this will happen many, many times in a season (even multiple times in a day) and be a cause of major frustration for hopeful customers many of whom, again, will choose to go elsewhere after their first such experience.
- 20 A further concern regarding the financial sustainability of this proposal is that PTL does not appear to have considered the importance of the Giant on days when the weather is too poor on the High Noon Express slopes to open that lift (or the lift itself is simply suffering a breakdown). It is not at all unusual in these days of rising snow levels that the Giant is skiable but the Movenpick is not. On such days, under the PTL proposal there would be nothing at all for customers to ski. Again, this is not a recipe for encouraging customers to return to Tūroa in the future.

Lift Removals – Impacts on Safety

- 21 The "single spine" will also have large negative impacts on safety at Tūroa, which of course has its own impacts on visitor enjoyment.
- 22 The increased congestion on the High Noon Express trails will obviously increase the likelihood of collisions. Further, the Giant and Nga Wai Heke carry a lot of progressing intermediates and when skiing to base is not possible they will be forced to ski the High Noon Express, whose trails are in the main not appropriate for them. This in itself will inevitably cause accidents, some of which will be serious on the increased slope angles of those trails.
- 23 One can also easily imagine a scenario where skiing to base is not possible due to lack of snow, and the Movenpick suffers a failure. How does PTL propose to safely transport the customers from Blyth Flat down to base? Will they walk over the rocks? And if the weather happens to be cold, wet and windy? This is not at all far-fetched on Ruapehu. Hypothermia is not out of the question. The Parklane is forced to close much less often than the Movenpick and a lift in this location (whether upgraded or replaced) at least allows customers to ride down that part of the mountain in safety if skiing down is not possible.

Reduction in Design Carrying Capacity

- 24 At first blush a reduction from 5,500 to 4,500 seems minor, but this is a nearly 20% reduction and one has to question how this can possibly be good for business. Naturally, the decrease in customers can in theory be made up for with higher prices, but with competition at Whakapapa this will be difficult to achieve longer-term and will inevitably drive skiers either there, or to the South Island with its more stable weather and better quality snow.
- 25 It is easy to imagine Tūroa entering a death spiral of higher lift prices combined with increased congestion on the remaining very limited lifts and trails, driving a growing reputation for dangerous and unpleasant skiing conditions, leading to further price increases and so on. At some point of course the congestion will ease but this will hardly be healthy for PTL's finances!

Summary

- 26 Lift redundancy at various levels of the mountain is a necessary feature of a sustainable and safe skifield operation and the fact that PTL is proposing removing every vestige of it from Tūroa is alarming, to say the least.

3.3 PTL Aspirations

- 27 Whilst aspirations are desirable, more important is the ability to actually achieve them. Unfortunately, PTL's proposal does not inspire confidence that they are able to do anything beyond aspiring.

- 28 It is curious, to say the least, that PTL expect to offer "a higher value experience" for visitors when, as demonstrated above, there will be twice the crowd trying to use the High Noon Express and associated trails! One frustrating visit where they get perhaps one or one and a half runs per hour and they will not return to Tūroa. As word of mouth spreads that Tūroa is now a frustrating (and dangerous) place to attempt to ski, this shift will only increase in momentum.
- 29 PTL quite reasonably expect that snowmaking will become ever more important to their operations, and mention it in a number of places in their application. In section 2.5 *Planned Upgrades and Replacements*, they propose extending the snowmaking reticulation and installing a snow factory, whose output is seemingly only planned to be used on the Alpine Meadow: "snow factory' located at the base area ... gives the local economy confidence in opening dates and continuous winter operation of the beginner's area". This is indeed important, but equally or perhaps more important is the ability to ski down to base from the upper mountain. There is always a marked increase in patronage as soon as the lower trails are skiable, and a corresponding decrease if downloading to base becomes necessary. And yet PTL propose removing lifts which currently enable visitors to continue to enjoy slopes lower than those on the High Noon Express (the Giant, the Nga Wai Heke) and to download from a much lower altitude than Blyth Flat (the Parklane).
- 30 Simply engaging in hand-waving at "smarter snowmaking software technology" does nothing in the face of rising temperatures. Software can only be so smart; to quote Mr Scott from Star Trek "Ye cannae change the laws o' physics". And yet PTL propose putting all their eggs in one basket with their lift offerings. This makes zero sense.
- 31 A further concern in this section is more hand-waving, this time at the possibility of summer operations. PTL can of course be forgiven for not having all their ducks in a row at this nascent stage, but one might have expected a little more thought and detail to have been devoted to this, given its critical importance to their financial sustainability. It is frankly ridiculous to think that large numbers of visitors will be enticed to Tūroa for its "retail and food and beverage facilities", when just on the other side of the mountain they can ride a gondola to 2,000m and have lunch in an award-winning restaurant! One must conclude that PTL fully intend to attempt financial sustainability on three and a half months' operation per year, which RAL with the benefits of scale managed only thanks to its taxfree status. Once again this calls into serious question the financial sustainability of this proposal.

3.4 Financial Performance

- 32 This section continues the hand-waving at summer operations and the equally ridiculous assertion that "other investors" will be attracted by these completely undefined offerings and "efficiencies in staffing", this latter suggesting that PTL intend attempting to get ever more blood from the stone of staff goodwill and ability to live on the smell of an oily rag, a process which RAL has arguably been refining and intensifying for a great many years already and which can hardly be expected to bring many further dividends.
- 33 We are given no ability whatsoever to comment on the reasonableness or otherwise of their financial forecasting, since the entirety of appendix 7 is redacted. This flies in the face of adequate public consultation, especially given Tūroa's chequered past on this score under for-profit ownership.

GENERAL COMMENTS

- 34 The application overall exhibits a disturbing lack of care in its preparation which must give pause for thought, given that PTL had six months in which to prepare it after the June 2023 RAL creditors' watershed meeting.
- 35 There are inconsistencies throughout (for example, whether the Movenpick replacement will be a detachable express chair or a gondola). There are also a great many instances in the Cheal report where the present tense is used ("The Tūroa base area is managed", "erosion and sediment control methods are employed", "Ski runs are constantly monitored", "Rock grooming is kept to an absolute minimum"). It is clear that this report has been largely recycled from previous RAL applications, with a hurried search-and-replace operation and a few modifications. One has to

wonder just how much effort PTL will be willing to expend as a concessionaire, if they put this little care into their application when they had everything to lose from a slipshod presentation!

- 36 Another and much more disturbing inconsistency revolves around just how much of their own money the PTL investors are actually going to put into Tūroa. In section 8 *Conclusion* they state "Upgrades of the existing infrastructure will require investment in excess of \$32 million during the next 10 years" and in section 2.4 *Licence Term* they make much of the importance of a long enough term to "realise the benefit of investment", but in section 3.3 *PTL Aspirations* it is clear that the \$25 million for the Movenpick replacement is to come from outside the company ("equity funding"). Thus, if we disregard working capital requirements, they are only proposing to spend \$7 million of their own funds, which is in the ballpark of the amounts RAL typically raises in a single season pass campaign.
- 37 This issue and the multiple significant concerns outlined above, not the least of which is the near-impossibility of maintaining high enough visitor numbers to ensure financial sustainability, lead to two disturbing speculations. Does PTL have no intention of long-term ownership of Tūroa – are they simply planning to benefit from "equity funding" and Kānoa's cash, extract the maximum revenue as long as they can from North Island skiers, and exit stage right? Or is their indicative development plan no more than that: indicative, and they have no intention of honouring it? After all, once the inevitable financial consequences of the early steps in their plan become obvious, no-one who wishes to remain living in the area (or to have their descendants do so) will wish them to continue down that path.
- 38 It seems that one might therefore conclude that PTL are at best deluding themselves (with the future of a national taonga at stake), and at worst acting duplicitously in offering this proposal to the Department and the public.

CONCLUSION

- 39 We are at a turning point in Ruapehu skiing. In order for future generations of North Islanders to have the chance to pursue snow sports on Ruapehu (recreation in a natural resource, in the parlance of the Act), long-term financial sustainability of the concessionaire(s) operating its skifields is critical.
- 40 A likely conclusion from the PTL proposal is that this company will not be running the Tūroa skifield long-term, which jeopardises public access to those slopes as it is not clear that another purchaser would be found at the point when PTL ceases operating.
- 41 Therefore there seems to be only one possible remedy open to the Director-General: this application must be declined in its entirety.

Appendix 1

Benefits to Tūroa from Shared Operation with Whakapapa

RSSA v s on for the Sk f e ds on Mt Ruapehu

Based on feedback and engagement with our wider groups over the last six months, we are proposing the following:

1. **Retain both Tūroa and Whakapapa** under the same company ownership where profits are reinvested in the ski fields not paid out in dividends. This provides the following benefits:
 - a. The ability to achieve economies of scale for efficient corporate overhead and support costs.
 - b. The winter ski season is short and with climate change likely to further shorten the ski season over time, therefore efficient corporate overhead is critical to the long-term financial sustainability of both ski fields. DOC concessions are unlikely to change which limits the ability to develop further on mountain summer revenue streams. Tūroa is limited to a winter only revenue stream, DOC concessions limit summer on-mountain activities, therefore Tūroa will rely on cost efficiencies in the corporate administration from economies of scale with Whakapapa.
 - c. Keeping both fields together maximises crowdfunding potential in the form of Season Passes, Equity, and Life Passes. Surveys tell us the community has a strong preference to retain both ski fields as community-owned operations.
 - d. Having two ski field operations provides diversification to weather risk and volcanic risk. For example: The Highnoon Express Chair on Tūroa is within the 2km Volcanic precautionary exclusion area and therefore cannot operate at volcanic alert level 2.
 - e. Historical data shows that Tūroa's ownership has been unstable as a standalone ski field with ownership changing hands within four to ten years. Tūroa was stable for 20 years when combined with Whakapapa and only came into trouble when RAL pivoted away from its crowdfunding business model to become a debt funded business to finance the Sky Waka Gondola and other redevelopment programs.
2. **Community ownership structure and governance model**
 - a. RAL had operated successfully for its first 60 years by only spending money that it actually had (low debt model). The model worked and only became broken under the most recent 10 year governorship, which wandered down the pathway of ever more corporatisation. This inevitably led to a high debt model. Further, poor strategic planning had simply not made provision for the poor seasons that inevitably come around, for various reasons, beyond the control of the company. Examples being eruptions, La Nina, COVID and more. We believe that a revised/revived/reset RAL can again be a successful company with a significant amount of fiscal efficiency and good governance.
 - b. RSSA will retaining both Whakapapa and Tūroa Ski fields under the existing Ruapehu Alpine Lifts (RAL) company.

Appendix 2

Lift Capacities, from RAL's 2011 IDP

Proposed Developments

6. LIFTS

6.1 Stage 1 lift developments will include:

- relocation of the High Flyer to service terrain out of Sou East Basin; to be called the **Nga Wai Heke Triangle Quad Chairlift**
This upgrade completed in 2012 with installation of Nga Wai Heke Chairlift
- a second carpet lift on Alpine Meadows to replace the Platter
- Upgrade of the Movempick Quad Chairlift to a 4 seat detachable chairlift, the Movempick Express

Stage 2 lift developments will include:

- Replacement of the Jumbo T Bar with a detachable chairlift, the Sunset Express

6.2 A further review of lifts servicing the beginner and low intermediate terrain below the Wintergarden area and down to include Alpine Meadows will be undertaken once an outcome is determined from a review of the Alpine Flush and Mangawhero Gully zones which are currently excluded from ski area developments.

Current Facilities - 2010							Stage 2 Developed Facilities - 2020							
Lift	Capacity	Altitude Base	Altitude Top	Vertical Rise	Length Incl	vm/hr	Lift	Capacity	Altitude Base	Altitude Top	Vertical Rise	Length Incl	vm/hr	
	(pph)	(m)	(m)	(m)	(m)	(000)		(pph)	(m)	(m)	(m)	(m)	(000)	
Alpine Meadow 1	1 000	1 010	1 019	9	125	9	Alpine Meadow 1	Carpet Lift	1,000	1,010	1,019	9	125	9
Alpine Meadow 2	700	1 016	1 026	11	112	8	Alpine Meadow 2	Carpet Lift	1,000	1,016	1,026	20	150	20
Movempick	1 700	1 030	1 037	307	1 348	522	Movempick	Express Quad	2,800	1,030	1,037	307	1,348	860
Parklane	1 500	1 030	1 708	130	000	200	Parklane	Triple Chairlift	1,500	1,030	1,708	130	609	209
Winter Garden 1	780	1 753	1 791	38	231	30	Winter Garden 1	Platter	780	1,753	1,791	38	231	30
Lower Mountain						777	Lower Mountain						1,127	
Giant	1 431	1 747	2 057	310	1 221	444	Giant	Triple Chairlift	1,431	1,747	2,057	310	1,221	444
High Flyer	2 220	1 030	2 078	148	700	320	Nga Wai Heke Triangle	Quad Chairlift	2,000	1,738	1,958	220	891	440
Jumbo	1 400	1 020	2 212	202	007	400	Sunset Express	Express Quad	2,400	1,820	2,300	480	1,615	1,152
High Noon Express	3 200	1 024	3 322	308	1 350	1 274	High Noon Express	Express 6 seat	3,200	1,024	2,322	308	1,350	1,274
Upper Mountain						2 455	Upper Mountain						3 308	
TOTALS						3 231	Total						4 436	
							cc Current Facilities - 2010						37%	



A. Permission Application Number and Name of Applicant **SUB 420**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Greg Lawson
Organisation	
Date	04.02.2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I am objecting to the overall application by Pure Turoa Ltd (PTL) and the transfer of the concession from Ruapehu Alpine Lifts Ltd to Pure Turoa Ltd.

My reasons for my objection or submission are:

1. Community owned model vs Commercial entity

I believe that for the long-term survival of Turoa ski area it needs to remain as a "Not for profit" community owned entity. As an avid user of Turoa's facilities for over 25 years and a shareholder in RAL for approximately 18yrs I've enjoyed using the facilities and contributed to capital raising initiatives to fund improvements within the ski area. I have seen the effects of adverse weather patterns, naturally occurring events and mechanical failure limit or entirely disable use of the facilities through the winter trading period. I believe that as a community owned entity there is a large group of people who have a vested interest in contributing financially to periods where winter trading is limited or unable to be carried out, ^{Sec 9(2)(a)}

I do not believe that same level of support will be given to a "For profit" commercial entity as that support will fall to investors and be based entirely on their Return on investment rather than the need to provide facilities to snow users and economic benefit for the entire region.

2. Unknown financial strength of Pure Turoa Ltd

I have serious concerns with the lack of financial data in PTL's application other than a promise that they have strong private equity backers with no actual data being supplied to the general public / snow users. I feel this is completely unfair when these facilities were paid for by generations of snow users. There has been a complete lack of information coming from PTL with regards to how they are going to fund their intended developments. Also of concern is the redacted names of all those involved in the governance of PTL including their directors, advisory board and management team. I question how a concession already in place for a community owned entity can fairly be transferred to a private operator under a shroud of secrecy, why is there even the need for the secrecy? The concession is in place to allow snow users access to a National Park and said users should absolutely know who will be making the decisions prior to any concession being granted.

3. PTL's Indicative Development Plan

While there are aspects of PTL's IDP I agree with, I wholeheartedly disagree with the removal of the Giant Chairlift / Nga Waiheke Chairlift / Wintergarden Platter. While these assets are old I believe they are still within their serviceable life and now is not the time to remove them given the financial difficulties being faced. I also believe the removal of these lifts will create massive congestion on the central groomed runs and cause issues with access to the top of the field from the wider Eastern /Western boundary runs. In essence there would be no choice but to return to the base area to gain access to the top again. This will create a lot of congestion in the base area and lessen the experience for a snow user. I believe PTL's desire to remove these lifts is based on their need to decrease OPEX rather than the benefit of the snow user. The reduction in daily visitor numbers is also concerning as it will have a direct impact on much needed cashflow over a very short 4 month operating period. Turoa currently has no ability to generate income outside of ski field operations and likely won't have for the foreseeable future. Of further concern is the proposed replacement of the current 60 year concession with a 10 year concession, even with the right of renewal up to 30 years in place I think this would put PTL in a significantly difficult position to attract capital investors in the first 10 year period and even more so if there is a repeat of the recent poor snow season.

The outcomes that need to be addressed by this application are:
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

The commercialization of a community owned “not for profit” operation and the long-term financial viability of that entity.

Full disclosure of PTL’s financial position and their ability to fund their development plan.

Full disclosure of names and experience of those that will be tasked with operating Turoa.

The short duration of the initial concession period being sought.

The removal of current infrastructure and reducing facilities creating congestion and lessening the experience of the user.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this ‘objection or submission form’.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

How do I submit my objection or submission?

Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



A. Permission Application Number and Name of Applicant **SUB 421**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	BRYCE HARRIS
Organisation	
Date	

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

My reasons for my objection or submission are:

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

G. Attachments

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A. Permission Application Number and Name of Applicant

SUB 422

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter

PAUL WOOD

Organisation

Date

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

LEASE AND LICENSE TO OPERATE

My reasons for my objection or submission are:

THE PERIOD OF 10 YEARS TOO SHORT AND DOES NOT ALLOW PURE TURQA LIMITED ENOUGH TIME TO DEVELOPE THE SKI FIELDS TO ITS FULL POTENTIAL. PURE TURQA HAVE NOT PROVIDED ENOUGH FINANCIAL AND FUTURE PLANS INFORMATION TO BE GRANTED A LEASE TO OPERATE CONTINUED PAGE 4B

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

THE APPLICATION SHOULD BE DECLINED AND A NON PROFIT OPERATOR BE APPOINTED SO PROCEEDS RUNNING THE 2 SKI FIELDS GO BACK INTO THE COMMUNITY

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

How do I submit my objection or submission?

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THE REMOVAL OF KEY LIFTS AND NO PLANS OFFERED TO REPLACE OR UPGRADE EXISTING LIFTS

REDUCING SKIER CAPACITIES THEREBY REDUCING INCOME WHICH MOST LIKELY WILL LEAD TO INCREASED SKI PASS COSTS AND LIMITING THE GENERAL PUBLIC BEING ABLE TO AFFORD TO ACCESS THE SKI FIELD

THE POSSIBLE INTERFERENCE TO THE VARIOUS IWI AND CROWN NEGOTIATIONS OVER THE ENTIRE TONGARIRO NATIONAL PARK

NO SOLUTION OFFERED FOR THE LARGER SKI FIELD WHAKAPAPA IN LIQUIDATION AND RECEIVERSHIP

THE PALTRY OFFER OF \$1 TO PURCHASE THE ASSETS AND BUSINESS ALREADY IN PLACE AT TURUA



A. Permission Application Number and Name of Applicant **SUB 423**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Simon Yates
Organisation	.
Date	09.02.24

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. *The duration of the concession is only 10 years.*
2. *Redaction of important information, including parties involved and consulted.*
3. *Not enough information to know if Pure Tūroa Limited (PTL) will be financially sound.*
4. *The decreased access to the mountain if the concession is awarded.*
5. *The concession excludes wider alpine snow sports assets on Mt Ruapehu, specifically Whakapapa.*
6. *Compressed negotiation and consultation period.*
7. *The Tongariro National Park (TNP) treaty claim(s) have not been negotiated or settled.*

My reasons for my objection or submission are:

1. *The 10 year duration does not provide for appropriate resource management of the primary purpose - snow sports. Duration is too short for long term management and investment of lift infrastructure.*
2. *Tongariro National Park (TNP) treaty claim(s) may lead to immediate uncertainty of a private business.*
3. *Short duration leading to volatility combined with limited information provided, excludes information on what DoC and MBIE will need to pay to remove infrastructure from the mountain if the business fails.*
4. *The purpose of snow sports is degraded with proposed reduction in capacity with the removal of the Nga Wai Heke chair, Giant Chair, and the Wintergarden Platter and less operational days, longer inactive vs active time on the mountain and lowered accessibility to the Maunga during the operating season. The lower capacity of 4500 would see increased demand, leading to price increases which will take the cost of utilising this natural resource beyond the reach of most New Zealanders. This fails the primary intention to operate, fails the customer base, ultimately fails the company – where the company fails all the objectives under the Conservation Act are compromised / thereby not promoted.*

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

If the application is approved, then I support -

A concession needs to be for a longer period of time (minimum 30 years).

Maintain the RAL concession for both Whakapapa and Tūroa ski fields to allow for appropriate combined management in an extreme alpine environment. Should PTL fail then the RAL concession permit may be revisited.

Keeping the existing RAL concession in place provides a safe working relationship while the TNP treaty claims are being negotiated between the Government and various iwi interests over coming years.

Any concession needs to show active consideration of ongoing accessibility (including socio-economic) to the Operation within this National Park. Especially as a non-profit operator is seen as being more compatible with public access to a National Park environment: This is achieve objectives of Conservation Act.