



A. Permission Application Number and Name of Applicant SUB 51

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	Grant Drummond
Organisation	Ohakune Court Motel
Date	24 January 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 reasons for my objection or submission are:

We support the plan for improved facilities due to the improved environmental outcomes. We also support pure Turoa's involvement of local iwi in matters relating to environment and culture and believe this relationship is a fantastic foundation upon which an environmentally, culturally, and economically successful business can be built on. Pure Turoa has our full support.

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.



A. Permission Application Number and Name of Applicant SUB 52

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	Dr Philip Dabrowski
Organisation	
Date	24/01/2024

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:

All parts supported

My reasons for my objection or submission are:

I strongly support Pure Turoa's bid for a concession to operate Turoa skifield. I believe they have demonstrated and provided a robust plan to care for the maunga and the unique environment of the National Park. I support the reduction of structures on the maunga as a way to both protect and minimise the human impact while also increasing the efficiency and sustainability of the ski area. I would urge DOC to issue PT a concession to operate and additionally strongly suggest that a longer term than 10 years is also reasonable, particularly in view of the 60 year term RAL was granted.

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.

Strongly urge a longer 20 year term to be granted.

G. Attachments

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A. Permission Application Number and Name of Applicant SUB 53

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	
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:

First and foremost I completely support Pure Tūroa Limited (PTL) in their approach to identify early on in the process, Year 3, whether or not the outworking of their business plan meets Iwi expectations. For too long Iwi have largely been ignored when it comes to their thoughts on what is happening to Koro Ruapehu. This plan gives me hope that there can finally be a strong relationship between the caretakers of Tūroa ski field and Iwi.

I also endorse PTL's approach to actually reducing the numbers to 4,500 as opposed to the current limit of 5,500. With my kids I often ask them, "Just because we can, does it mean we should?" For the best experience possible for anyone who comes to Tūroa there are several factors at play such as parking, access, staffing numbers etc. Lowering the maximum to 4,500 means that a better experience should be able to be provided. Additionally, the human impact on Koro Ruapehu will be significantly less with 1,000 less people a day. In addition to this, streamlining and removing lifts that are not fit for purpose or only open 10-15% of the time means that the environmental impact is significantly lessened.

In closing, I completely and wholeheartedly support PTL's application for a concession to operate the Tūroa ski field.

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?



A. Permission Application Number and Name of Applicant SUB 54

Pure Tūroa Limited 109883-SKI

JOHN + MARY ANN WHITE
SUBMISSION PAGE TWO OF THREE

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 + Mary Ann White
Life Pass members

Organisation

Date

24/01/2024

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

SUBMISSION PAGE THREE OF THREE

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

We are submitting this a general response to yet another document requesting comments to the future of Ruapehu. We have previously submitted that the process so far has been non-transparent, non-timely, not acknowledging the past inputs and support and funding given by many persons including on Life Passes which were used to raise funds for the development of facilities on the mountain.

My reasons for my objection or submission are:

As above, but also again MBE, MBE appointed liquidators have ignored, bulldozed and put through their own agenda seemingly not considering what has been previously ~~met~~ ^{extensively} met on, extensively discussed and voted on real few years since RAL got into financial trouble. Again it is Jan 2024, the next ski season is looming and we are not far ahead, with out relevant consents from IWI DOC etc not yet in place. The applicants financial support from the Govt is over generous for their 10 yr (maybe 20) 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.

- ① Timely procedure & more level playing field & transparency
- ② Future costs to skiers should be fair, not make it a skifield for the wealthy only as previous pure Ruapehu ski pass quotes seem to be. Especially with the taxpayer support they are supposedly to receive.
- ③ Get on with proper process to reassure everyone from the area and the skiers, Ruapehu has a future as a skifield.

G. Attachments

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Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
RSSA UPDATE	JPG	2 PAGES OF LETTER TO CHRIS LUXON,

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.

JOHN + MARY-ANN WHITE
SUBMISSION FOR 109883-SKI

RSSA update and a simple solution!

ATTACHMENT
PAGE 1/2



RSSA letter to the incoming Prime Minister Christopher Luxon

Current RAL Receivership. Tēnā koe Chris I write in relation to Ruapehu Alpine Lifts (RAL) recently being moved into receivership. We understand that MBIE has now taken control of Ruapehu Alpine Lifts by purchasing the ANZ debt for \$1 and appointing Calibre Partners as receivers to seize the assets.

Tēnā koutou

A successful ski season has passed, and summer is arriving. Unfortunately, 14 months on and uncertainty around the maunga is still with us.

The RSSA sees two key issues which are:

1. Various iwi have directly [opposed](#) the sale of RAL assets and new concessions being granted, as that will prejudice their upcoming Tongariro National Park (TNP) treaty claims, as outlined in the most recent letters to the Government from collective iwi.
2. MBIE via Calibre Partners is still aggressively pursuing a private commercial solution, requiring new concessions and ignoring the above issue.

While [concessions](#) have now been sought for Tūroa, they still require approval from collective iwi. If that approval had been forthcoming, the current commercial transactions would have been completed many months ago.

At present, the above two aims are diametrically opposed, and so the process is effectively stalemated. Furthermore, there are likely to be legal challenges if the process proceeds. In short, there will be no real progress. In addition, MBIE has managed to disrespect multiple iwi, ignore key stakeholders, divide the community, and waste \$3m of taxpayers' money on consultants and lawyers.

~~The Solution - Iwi Collective with Ski Community and Government Support~~

~~Patūtokōtokō is an iwi collective who has a plan to take over management of the ski fields with the backing of the Government and the ski community. Given the unique circumstances of Mt Ruapehu's operation, we believe they are the 'natural owners' because of the following key reasons:~~

The Solution – Iwi Collective with Ski Community and Government Support

Patūtokōtokō is an iwi collective who has a plan to take over management of the ski fields with the backing of the Government and the ski community. Given the unique circumstances of Mt Ruapehu's operation, we believe they are the 'natural owners' because of the following key reasons:

- The Government now owns most of the secured RAL debt (approx. \$40m+) and assets.
- Iwi, via the Tūwharetoa Gondola Limited Partnership own the Whakapapa Gondola as a secured asset.
- Various iwi control transfer of concessions.
- Life Pass Holders (LPH) are \$32m unsecured creditors and the majority of the current RAL lift assets were financed through life pass capital raises since 2000 (approx. \$45m).
- The solution needs to be intergenerational, with a 50+ year strategic planning horizon, which goes against the way in which Private Equity companies (PE) operate.

The RSSA support this approach via a creditors compromise, keeping the existing concessions and restructuring RAL. This also provides adequate time and respect for iwi to conclude the Tongariro National Park Treaty Settlement which may take many years. We have written to the new Prime Minister and Ministers to advocate for this in the linked letter.

Unfortunately, it is the view of the RSSA that if this does not happen soon, we will arrive at March 2024 with no resolution, no season passes, and much more Government money needed for the fifth time in 17 months, along with continued uncertainty for the long-suffering staff, local businesses, community, and clubs.

To help avoid this, the RSSA team and supporters are continuing to work with various iwi and other stakeholders to ensure a sustainable long-term outcome and we appreciate all of your support. To date the RSSA has helped:

- Successfully lobby the government on the importance of Ruapehu ski fields and the need to provide further funding.
- Unify the unsecured creditors and Life Pass Holders so that they have leverage throughout the insolvency and liquidation process.
- Ensure the season pass and day pass purchases were affordable for the 2023 ski season.
- Provide a strong voice to advocate what the wider ski community would like to see for the Ruapehu ski fields.

We hope you all have a wonderful holiday with family and friends, looking forward to a positive outcome in 2024.

Ngā mihi

The RSSA whānau

JOHN + MARY-ANN WHITE
SUBMISSION FOR 109883-SKI
ATTACHMENT PAGE 2/2.



A. Permission Application Number and Name of Applicant SUB 55

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	Jonathan Dean
Organisation	
Date	25/01/24

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:

General content of the application
The applicants directors
Term
Conservation Act 1987, National Parks Act 1980 and the Tongariro National park Management Plan.

My reasons for my objection or submission are:

General submission highlighting the quality of the applicants, their commitment to protection of the values identified within the Conservation Act 1987, National Parks Act 1980 and the principles of the Tongariro National Park Management Plan.

Particularly, Pure Tūroa have exhibited a strong engagement with mana whenua and made a strong commitment to further the tikanga of Maori within the region and further support the ambitions of the people of Ngāti Rangi, Uenuku, Ngāti Haua and wider Tūwharetoa.

The directors of Pure Tūroa have demonstrated a sound proposal and have the commercial acumen to ensure the long term delivery of the concession for all New Zealanders. I particularly appreciated their commitment to furthering the Kaupapa Maori, Kura Kaupapa youth Ski Academy and also ensuring commitment to bring tangata whenua along on the journey through joint programs

Whilst the term is limited, 10years is a reasonable period of time to ensure they demonstrate their actions and deliver on the commitments contained within their application. It will be crucial for North Island Snow Sports for the company to be granted a longer term inline with their development ambitions, subject to their fulfilment of their commitments.

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 comment

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



A. Permission Application Number and Name of Applicant SUB 56

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	Stuart Grant
Organisation	
Date	26 January 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 concession to operate parts of the skifield
2. The length of term of the concession (and the short review term)
3. Access to and use of buildings and assets of RAL
4. The diminished scale of the operation should the PTL concession be awarded
5. The fact the concession excludes wider alpine snowsports assets on Mt Ruapehu (Whakapapa in particular)

My reasons for my objection or submission are:

1. There remains an existing concession on the site of 60 years. Issuing another risks conflict
2. The short length of the concession sought indicates a clear lack of 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 patently short on this front.
3. The well publicised interests of other parties (including 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 skifield.
4. The reduction in capacity with the removal of some lifts means less operational days, longer inactive vs active time on the mountain and lowered accessibility to the Maunga during the operating season. Lower capacity 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. In a similar vein, a lack of synergy between the other snowsports assets on 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 Ruapehu.

Sec 9(2)(a)

It has been difficult to see it change from a family mountain to something more akin to Queenstown -not really for most New Zealanders. Sec 9(2)(a)

hat Mana Whenua are included and respected in their role as kaitiaki (something which was very obvious in the staffing and culture of RAL as an operator). The mauri of Ruapehu and the kaupapa of Tongariro as our oldest national park -a gift to the people of New Zealand- are really not evident in the approach that PTL are taking. The manner in which MBIE and RAL receivers have disregarded and alienated such a wide section of Ruapehu's stakeholders in enabling this concession application is abysmal. Conversely, DOC is known for its partnership approach, its focus on making and keeping our natural environment both safe and accessible to the people of New Zealand -and for its valuing of public interest over short-term commercial exploitation. Please hold true to your own kaupapa on this one.

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 the whole mountain -both Whakapapa and Tūroa.
- 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
- Any concession needs to show active consideration of ongoing accessibility (including socio-economic) to the operation within this National Park
- There must not be any existing unresolved concession at the time any new concession is agreed

Nga mihi
 Stuart Grant (on behalf of the Grant whanau)

G. Attachments

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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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A. Permission Application Number and Name of Applicant SUB 57

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	William Papple
Organisation	Rocky Mountain Chalets
Date	26/01/2024

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:

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.



A. Permission Application Number and Name of Applicant SUB 58

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	Eddie Hoskin
Organisation	Strange Dog
Date	26-1-24

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 believe this concession is the best way forward for the mountain and its surrounding communities. The local economy relies heavily on the ski fields running, and Pure Tūroa provides a well planned and fair solution to the ski field issues. Further delays or stalling could result in no ski season which will directly cause more business closures and economic harm to the towns around the area. Sec 9(2)(a)

Pure Tūroa's plans for year-round operation on the mountain will provide a much needed boost to the community by encouraging more visitors to the region.

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



A. Permission Application Number and Name of Applicant SUB 59

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	Beverlie Robitaille
Organisation	
Date	26/01/24

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:

I fully support Pure Turoa's proposal and consider it will benefit Ohakune and the surrounding region. A prompt decision on the application will ensure a smooth lead-up to the ski season and avoid last year's nailbiting run-up to the July opening when nobody knew if we'd get a season or not. The town needs that certainty to attract accommodation bookings well in advance.

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.



A. Permission Application Number and Name of Applicant SUB 60

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	Urszula Tansley
Organisation	n/a
Date	27/01/2024

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:

All of them.

My reasons for my ~~objection or~~ submission are:

I support the approach that Pure Turoa is taking with this application. My family and I are new skiers but have long loved Ruapehu (Mountain and Area). We have come to know the area well and while the people are resilient, there is an obvious dependence upon winter sport activities. They need to exist and continue for as long as is possible.

As a lover of mountains and 'being outside' I understand the impacts of the infrastructure on the mountain. I also have a deep respect for the culture of the local Iwi. I see competing demands to have a sustainable/profitable business, be respectful of culture and ecology, maintain the local economy and provide sport activities that are safe.

I believe that the community investment model used by RAL has not been sustainable. For example, there is under investment in safety systems. While there are arguments for a continuation of RAL under a new management structure, I have little confidence in what I have seen.

Pure Turoa appear to me to have been the only organisation that are considering the multi-faceted approach that is required. The retirement and (importantly) removal of legacy infrastructure is to be applauded. The mountain is a beautiful place, and less infrastructure will return the aesthetics. I applaud the central lift access area. This will, hopefully, satisfy and show respect to cultural concerns as well as reducing the impact of infrastructure on the mountain.

The proposed snow factory and extension of the base/learner area is also to be applauded. This will give more certainty to the local economy and provide more reliable jobs for the local community.

The eventual replacement lifts will provide a safer environment, better access to the mountain. Importantly the investment in the learner area will separate learner and intermediate/advanced skiers and provide a safer environment for all. The improved efficiency and environmental approach to this strategy is respectable.

As someone who has enjoyed the great outdoors for many years, through walking, cycling and now skiing it is important that we have access to our National Parks. Wrapping them in bubble-wrap or a glass case and only allowing viewing from a distance will not help education or people to respect the beauty of these locations. There must be a balance, that respects the location, the National Park status, and the culture whilst providing for employment opportunities and a sustainable local economy. I believe that Pure Turoa have presented the best case for this. They are also showing themselves to be committed to working with DoC and IWI, and to continue to evolve their overall approach.

Whilst some people will be concerned at the 10-year concession being too short. I believe that it allows Pure Turoa to be tested, for a trial period to be undertaken. I hope that in that time they will provide themselves to be strong stewards and guardians. I also hope they live up to their vision. If, and only if, they do that they we will support an extension to the concession if it's applied for.

On reading the concession application, the overriding feeling I get is one of respect for the mountain. I also feel that they want to do better, to listen, and to work with all interested parties to create a better Turoa. I support their determination and I support their application for a concession.

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 do not want to see changes to the application. I believe that the tone is correct, the approach is sound, and that this is the best option on the table for the local 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?

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 61

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	Scott Tansley
Organisation	n/a
Date	27/01/2024

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:

All of them.

My reasons for my ~~objection or~~ submission are:

I support the approach that Pure Turoa is taking with this application. My family and I are new skiers but have long loved Ruapehu (Mountain and Area). We have come to know the area well and while the people are resilient, there is an obvious dependence upon winter sport activities. They need to exist and continue for as long as is possible.

As a geographer/environment scientist (in education) I understand the impacts of the infrastructure on the mountain. I also have a deep respect for the culture of the local Iwi. I see competing demands to have a sustainable/profitable business, be respectful of culture and ecology, maintain the local economy and provide sport activities that are safe.

The community investment model used by RAL has not been sustainable. For example, there is under investment in safety systems. While there are arguments for a continuation of RAL under a new management structure, I have little confidence in what I have seen.

Pure Turoa appear to me to have been the only organisation that are considering the multi-faceted approach that is required. The retirement and (importantly) removal of legacy infrastructure is to be applauded. The mountain is a beautiful place, and less infrastructure will return the aesthetics. I applaud the central lift access area. This will, hopefully, satisfy and show respect to cultural concerns as well as reducing the impact of infrastructure on the mountain.

The proposed snow factory and extension of the base/learner area is also to be applauded. This will give more certainty to the local economy and provide more reliable jobs for the local community.

The eventual replacement lifts will provide a safer environment, better access to the mountain. Importantly the investment in the learner area will separate learner and intermediate/advanced skiers and provide a safer environment for all. The improved efficiency and environmental approach to this strategy is respectable.

As someone who has enjoyed the great outdoors for many years, through walking, cycling and now skiing it is important that we have access to our National Parks. Wrapping them in bubble-wrap or a glass case and only allowing viewing from a distance will not help education or people to respect the beauty of these locations. There has to be a balance, that respects the location, the NP status, the culture whilst providing a sustainable local economy. I believe that Pure Turoa have presented the best case for this. They are also showing themselves to be committed to working with DoC and IWI, and to continue to evolve their overall approach.

Whilst some people will be concerned at the 10-year concession being too short. I believe that it allows Pure Turoa to be tested, for a trial period to be undertaken. I hope that in that time they will provide themselves to be strong stewards and guardians. I also hope they live up to their vision. If, and only if, they do that they we will support an extension to the concession if it's applied for.

On reading the concession application, the overriding feeling I get is one of respect for the mountain. I also feel that they want to do better, to listen, and to work with all interested parties to create a better Turoa. I support their determination and I support their application for a concession.

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 do not want to see changes to the application. I believe that the tone is correct, the approach is sound, and that this is the best option on the table for the local community.

G. Attachments

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How do I submit my objection or submission?

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A. Permission Application Number and Name of Applicant SUB 62

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	Pim de Monchy
Organisation	De Monchy family
Date	28/1/24

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:

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

My reasons for my 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 1986, and we enjoy skiing/snowboarding, tramping and mountaineering as forms of recreation together with our four sons and many of our friends. We are regular and respectful visitors to TNP and being there is one of our favourite things to do – it brings us joy!
- 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, at least until climate change renders the activity commercially unviable in the future. 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, Wintergarden 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:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area
2. 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.
3. 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

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 63

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 Hishon

Organisation

Date

27 January 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:

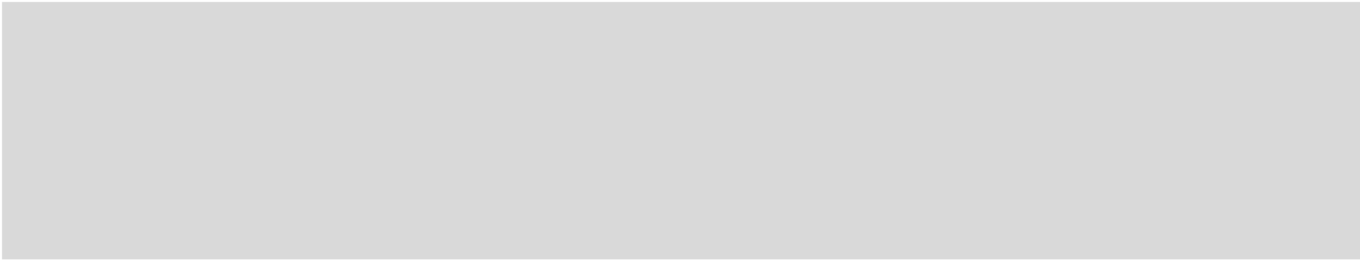
1. The length of concession being sought is 10 years.
2. Removal of key lifts – Nga Wai Heke chair, Giant Chair, and the Wintergarden Platter
3. Failure to address a solution to Whakapapa’s part in the liquidation and receivership of RAL.
4. Transparency around PTL’s Governance and Management Team, and redactions of financials.

My reasons for my objection or submission are:

1. I am concerned the length of concession does not allow for any operator to make any significant and serious investment into the skifields.
2. Additional environment damage created by removing the structures.Reducing ski uphill capacity and concentrating users onto reduced lift-accessed terrain. Reduced public enjoyment due to limiting the skiable terrain. Health and safety concerns should the ski slope capacity be exceeded, dangerously disrupting skier flow (skier traffic congestion/bottle necks due to all skiers being uploaded and offload to limited number of offload and upload points). Slope capacity is an essential component of a properly planned and functioning ski area. To put too many users onto limited terrain is dangerous.
3. The concession application for Tūroa does not address a solution for Whakapapa, leaving the administration/liquidation/receivership of RAL to be resolved.
4. This process is rushed to try and get a deal done before the 2024 ski season. Privatising Turoa is not the best way forward to a viable, generational future.

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?

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A. Permission Application Number and Name of Applicant **SUB 64**

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 <u>Roupe van der Voort</u>
Organisation	
Date	28 January 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:

Removal of lift infrastructure.

Other matters.

My reasons for my objection or submission are:

The final objective of Pure Turoa is to have only the Movenpick chair (upgraded to detachable) and the High Noon Express.

This will manifestly degrade the recreation capacity of the Turoa ski area. Currently learners begin in the Alpine Meadow. Upon gaining some skills they progress to the Wintergarden area, using the platter lift there. Upon further skills they then ski the Parklane.

Once they have intermediate skills they then ski the Movenpick and/or the Giant, and progress from there wider out and onto the High Noon.

With Pure Turoa's proposal there is no transition area between the magic carpet of the Alpine Meadow and the intermediate level slopes of the Movenpick. You can see from the trail map that the **only** Green (beginner) trail from the mid-area leaves from the bottom of the Wintergarden accessed from the Parklane chair. This proposal will increase risk of injury to transitioning skiers, and - due to lack of skills - to other skiers they share the slopes with.

What will happen is that all skiers will be concentrated onto 2 lifts. This will increase wait times (which last season with twice as many lifts extended as long as 20 minutes). The recreation experience will degrade significantly.

During the most recent season, towards the end in August when I skied there, the lower reaches of the mountain - Clarry's Track - became unskiable due to lack of snow. RAL closed skiing on it until end of day unloading, and even then downloading on Parklane was encouraged. With only a Movenpick, the entire middle section of the mountain then becomes unskiable, because if Clarry's Track is closed there is no way to get back up once you have skied below the top of Movenpick. Previously that was made available by way of the Giant lift, which PTL proposes to remove.

PTL have stated that lift infrastructure is expensive because it is all bespoke. This is utter nonsense. **Sec 9(2)(a)** [redacted] The lift infrastructure is all exactly the same. It's poles in the ground, a ropeway and chairs. It is not difficult, it is done thousands of times around the world. PTL are lying about the infrastructure difficulties. About the only positive suggestion is making Movenpick detachable chairs, so that they can be garaged overnight or in bad weather.

How do they intend to supply the cafeterias currently at the Giant and at the top of the Parklane? Remove the lifts leading to those places and supply becomes difficult.

S3.4 Financial Performance. This section says that Kanoa will take a 25% stake in PTL. So the Government **will** invest into the mountain, but only by way of PTL. It is not the function of the government to "pick winners" and they have shown themselves to be very bad at it in the past. If all the debts are being written off, and Kanoa is willing to invest tens of millions into Turoa, why is this not available to either a re-worked RAL, or RSSA? This cosy arrangement, established in secret, excluding all other options, plain stinks. It has all the hallmarks of private equity coming in, convincing the government to put in money, and then raid the asset for everything it's worth. The removal of the lifts shrieks short term planning, and walking away in 10 years.

S6.5 Recreational values. In this section PTL states: *Chairlifts can provide transport to members of the public that would otherwise be physically unable to access the mountain beyond the road end and therefore provides a valuable facility for all persons. Appreciation for nature often requires experience with it...*

What are they suggesting? That foot traffic - with physical limitations - will take the Movenpick up to where it ends? What will they do there? The nearest cafe is the Giant, which is several hundred metres away, uphill, on a heavily used trail. If a bunch of pedestrians start milling around in that area between the end of the Movenpick and the loading station of High Noon, there will be chaos, and injury is likely. The nearest cafe downhill is down an intermediate Boneyard trail. It's called Boneyard for a reason and again, adding pedestrians to it is ludicrous. The proposal **reduces** access to the ski area, not enhances it.

Pure Turoa has said in its submission that PTL have been consulting with Ngāti Rangi and Uenuku regarding the Tūroa licence application since February 2023, and will continue to do so. I doubt this is true, but even if it is, it was an afterthought. At the watershed meeting in June 2023, it was clear the neither PTL or WHL had consulted with iwi to date, as neither group had achieved a concession from DoC, which is predicated on consultation with iwi.

Pure Turoa can sprinkle as much Te Reo as they like through their proposal, but they are not genuine in this regard.

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.

PTL should not be awarded this concession. They will reduce the amenity value, strip asset value by removing lifts and sucking as much revenue out of it for ten years, before walking away and leaving a mess. They say that's not their intent, but their actions have all the hallmarks of this happening.

Remove infrastructure (so they don't have to invest), raid the pockets of those that do come up for a poorer experience.

In my view there is no remedial activity that could make this proposal work. Doc and Kanoa should go back and look at how RAL can be restructured to put an improved, expanded and reliable ski operation in.

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 65

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

Allen Noel Blithe

Organisation

N/A

Date

28/1/24

D. Statement of Support, Neutrality or Opposition

- 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:

I totally support in full all aspects of the Pure Turoa application to take over Turoa ski field and its continued operations.

My reasons for my objection or submission are:

I am a life long skier who has seen the local economy grow and would like to see skiing continue in a sustainable manner at Turoa for the benefit of the local community, economy and skiers. RAL have shown themselves incapable of doing so and the RSSA are unable to unite the skiing community. Pure Turoa has a wide support base and experience

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 entire application should be accepted as submitted by Pure Turoa.

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
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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 66

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	Karyn Skerrett
Organisation	
Date	28/01/2024

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:

I support in full the Pure Turoa application to operate Turoa Ski Area for a period of 10 years.

My reasons for my objection or submission are:

I am a life long skier of the Turoa ski area and feel that the Pure Turoa application to operate over the next 10 years is the best option to benefit not only the skiing community, but more importantly the local community and economy. Pure Turoa has wide support and experience.

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 full application should be accepted as submitted by Pure Turoa

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 67

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	Nina Hennig
Organisation	
Date	29/01/24

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:

I support the entire application.

My reasons for my objection or submission are:

I support Pure Tūroa operating Tūroa skifield and believe the continued operation of the skifield is incredibly important to the surrounding community, both from direct employment by Pure Tūroa and the support the operation of Tūroa gives to local businesses.

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.



A. Permission Application Number and Name of Applicant **SUB 68**

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	James Bell
Organisation	Ohakune Community Charitable Trust
Date	8 January 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. Environmental
2. Cultural
3. Tourism Impact

My reasons for my objection or submission are:

1. Environment

We have engaged with the Pure Turoa Ltd management team throughout the process leading up to their DoC Concession Application and understand their application to be aligned with our organisation's environmental values for the region. We believe they have a team that is experienced and highly competent in operating within the framework of the Tūroa concession and their company's stated values indicate they aim to greatly exceed the environmental performance of historical ski operations on the mountain.

2. Cultural

Our organisation works closely with local iwi, primarily Ngati Rangī, and we are satisfied that Pure Turoa Ltd has worked closely and productively with Ngati Rangī prior to submitting their application. They have kept Ngati Rangī fully informed and have listened to their concerns and ideas resulting in a plan for the Tūroa ski area that aligns with iwi cultural and environmental aspirations to the long term benefit of all stakeholders.

3. Tourism Impact

As a local community organisation who understand the specific environmental challenges and opportunities important to our region, we strongly support Pure Turoa Ltd's Tūroa ski area concession application. We believe they have an excellent understanding of what is required to ensure that such a vital tourism activity for our region is managed for long term sustainability that will benefit generations to come.

As an organisation we look forward to working with Pure Tūroa Ltd in development opportunities for Ohakune.

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.

None. We have no requests for amendments.

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
NA		

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 69

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	Ms. Kordula Daniel
Organisation	Ohakune TOP 10 Holiday Park
Date	29/01/2024

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:

I support all parts of the application.

My reasons for my objection or submission are:

It is vital to have Turoa operating for the benefit of the whole town and surrounds.

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.

A. Permission Application Number and Name of Applicant **SUB 70**

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	Stu Robinson
Organisation	Kings Ohakune
Date	15.01.24

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:

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.

My reasons for my objection or submission are:

Economic stability within the town and region including many businesses such as Kings Ohakune and all the staff and families of the staff effected by not having this business operating.

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



A. Permission Application Number and Name of Applicant SUB 71

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	Paul Ridley-Smith
Organisation	NA
Date	30 January 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 support the application in its entirety.

My reasons for my objection or submission are:

1. I have carefully read the application and supporting documents. It is clear to me that the applicant has given significant and detailed thought to its application and how, if the application is successful, it will operate the Turoa snowfield for the benefit of snowfield users and the wider community.
2. A few aspects of the application could have been given greater emphasis:
 - (a) The use of the Turoa snow field has, over many years, given NZers a huge amount of pleasure, joy and respect/appreciation for the natural environment. That has been my, and my family's, experience, over four generations. Skiing/snowboarding instils in young people a love of physical activity and appreciation for the outdoors. The camaraderie that comes with adventures (sometimes challenging when the weather is poor) away from home gives them confidence and positive life skills. I know that in my family skiing adventures at Turoa bonded us together and gave us life opportunities. Sec 9(2)(a) - a benefit that can't be measured. It would be a great pity if through PTL not being granted a concession other families are denied these opportunities.
 - (b) Most New Zealanders are urban and there's been a disappointing trend away from young people getting into the outdoors. Anything that encourages people to get into our national parks and get first hand appreciation of the beauty and the sometimes raw power of nature is a good thing. We want people to understand our obligations to protect our natural environment. To achieve, it is essential that they're intimately exposed to that environment in an appropriately managed way. The scale of the activities proposed are very modest relative to size of Tongariro National Park and I consider the environmental effects also modest. Allowing the skiing/snowboarding activities to occur denies others nothing. Those who want the undisturbed beauty of Ruapehu will still have vast areas to enjoy. Arguments that granting the concession in some way pollutes are, in my view, spurious. In my mind, there is a strong net positive to the environment in granting the concession because of the increased exposure that people (esp younger people) will have to the mountains, and the need to appropriately manage our wider environmental resources.
3. I have no particular views on the applicant's business case and asset management proposals. The proposed reduction in the number of lifts (in the medium term) surprises me, but I believe the applicant is best placed to decide such matters.
4. I'm also surprised that concession period sought is only 10 years. I'd prefer that the period is longer, as security of tenure will create better incentives to invest and manage wisely.
5. I'm not especially aware of the statutory tests that DOC must assess this application against. Perhaps the points I now make are to matters that are irrelevant (in which case, apologies).
 - (a) That the applicant is a private, for profit, company (vs RAL's rather confused status) is a positive attribute. What DOC should satisfy itself about is that the applicant is sufficiently well capitalised (and managed and governed) that it can execute its business plan, even when external events work against it (poor weather, COVID etc). Any submission that a community owned operator is somehow better or more virtuous or because the applicant is a private, for profit, DoC should mark down should be dismissed. My view is that a co-operative type operator would carry greater risks of failure. RAL failed, in part, because it had no access to capital (other than the endless sale of now worthless life passes). The net result is the effective abandonment of the infrastructure on the DOC estate. It would be a great shame if that mistake was repeated. Community interests can be satisfactorily addressed through the terms of the concession, just as they are with the vast majority of DOC concessions awarded to private operators.
 - (b) Skiing/snowboarding are relatively expensive pursuits (unfortunately). However, they are especially expensive for North Islanders who travel to the South Island. While the Turoa experience will never be cheap, it has been (and should continue to be) much more affordable for North Islanders than the South Island. There is a good equity and access argument for DOC doing what is needed to help keep the large North Island snowfields in operation.
 - (c) Related to this, I note that the applicant seeks exclusive rights. That is logical and understandable and I have no objection to it. But I would like to see commitments to allow people to have access to the concession area without charge – with charges only applying for the use of the lift infrastructure. That has long been the practice. Perhaps it is already in the draft concession agreement (or

embedded in RALs existing agreement). Hikers, climbers and telemark skiers use the concession area without charge, along with alpine skiers. Families bring up toboggans etc and use the concession area without charge. This should be protected.

- (d) There are environmental effects from operating the snowfield (the fixed infrastructure being the most obvious and the tracks necessary to get access to it). In my view these effects are trivial in the context of the entire mountain. They are a small price to pay to provide many thousands of NZers the encouragement to get into the mountains and appreciate (and ultimately across the much wider DOC estate) protect what we have.
- (e) Arguments have been made (esp by some involved in the Ruapehu Skifields Stakeholders Association) that a new concession shouldn't be granted until local iwi Treaty of Waitangi claims over Tongariro National Park are settled. I disagree with this view. All over New Zealand there are unresolved Treaty claims that involve, one way or the other, the DoC estate. DoC, none-the-less carries on its business and grants concessions. Mt Ruapehu is no different. An unresolved claim(s) is no reason not to grant this concession.
- (f) Other arguments are made that the Turoa and Whakapapa snowfields should be managed under a single concession. It is my preference that season pass holders can use both fields with a single pass. But the absence of that feature is no reason to mark down the assessment of this application – indeed I think that submission irrelevant to DoC. In any event, my expectation is that if a separate concession is granted to operate the Whakapapa field to another operator (fingers crossed) then the two operators will negotiate a sensible mutual recognition system because that would be mutually beneficial.

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.

None – although as noted above if the applicant were to revise its application to seek a longer concession period then that would create a better outcome for all.

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



A. Permission Application Number and Name of Applicant

SUB 72

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	Bill Bamber
Organisation	
Date	24.1.24

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:

Support Pure Turoa gaining a concession
for Turoa ski field,

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.



A. Permission Application Number and Name of Applicant

SUB 73

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	Jo Bambe ✓
Organisation	
Date	24.1.24

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:

Support Pure Turoa gaining a concession
for Turoa skifield.

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.

Submission on Application

By Pure Turoa Ltd 109883-SKI

1) Introduction

I make my submission with extensive experience of managing licences and leases in National Parks and other Conservation areas over a period of thirty-eight years.

My initial experience was at Turoa Ski-field when I was involved in the Ski-Field Feasibility Studies, the Environmental Impact Assessment and the licence allowing Alex Harvey Industries to develop the ski-field.

As Chief Ranger and then DOC Conservator, I personally negotiated with RAL their current licence to operate at Iwikau, as well as licences for all club huts in Iwikau and Whakapapa Villages. I was the responsible DOC manager when RAL took over the Turoa licence.

I was the Manager responsible for developing and signing off both the current Tongariro National Park Management Plan and the Tongariro/Taupo CMS. I am a strong believer in the principals of the National Parks Act and the need for strong/effective Management Plans, in order to protect parks and public access to them.

My experience taught me that licences are the most effective tool to provide concession opportunities whilst best protecting National Park values and managing impacts from commercial development. They also optimise public access whilst not impeding a licensee from carrying out their mission. A lease on the other hand, provides essentially exclusive ownership rights to land and increases the impacts of development, through a greater area of land being included in the leased area.



2) The Application

I am not opposed in principal to the transfer of the Licence from RAL to Pure Turoa but completely opposed to the issue of leases for the specific activities detailed in the application. My submission will outline why leases should not be granted and why the proposed activities should be included in the licence.

3) Lease v Licence

This is a fundamental question unlikely to be understood by the public. My discussions with DOC staff indicate the distinction is not understood by most of them.

There is no requirement in the National Parks Act 1980 to issue a lease for infrastructure outlined in the application. The legislation offers both options, a licence and a lease as a concession.

The Tongariro National Park (TNP) Management Plan is quite clear that it directs licences to be issued for the three ski-fields. Clause 5.2.6 SKI AREA LICENSES states that “the Department believes that a ski area operated and managed by one concessionaire has benefits through a co-ordinated approach to public safety, the development of facilities and ultimately the skier experience”.

OBJECTIVE 1 states “To protect the values of Tongariro National Park through co-ordinated, effective licence management for ski areas”.

There are many reasons why a single licence should be offered at Turoa Ski-field.

- a) As explained above, the National Parks Act 1980 allows it and the TNP Management Plan requires it.
- b) A licence minimises the amount of land used exclusively by the concessionaire to that required to operate the Ski-field in a safe manner. This is essential in a National Park. It ensures that only required land is developed as well as allowing optimum public access.
- c) A lease is virtually an alienation of land. It provided the right of “exclusive possession”. This means the licensee can manage the entire area of the lease for their own requirements without regard for the general public. The Department has many examples of lease holders managing land without regard for the principles of the legislation that the land is held for. The Chateau lease is a local example.

- d) At expiry of a lease there can be a commitment for the Department to pay out lease holders. This has occurred in the South Island high country with farming leases and it appears, it is a current issue with the lease at the Chateau?
- e) There is a strong precedence for licences being used for all ski-field concessions in Tongariro National Park; for the reasons I am emphasising. It has not happened by error or omission. Licences have been used since 1953 and are reflected in current licences to operate the three ski-fields and in keeping with the TNP Management Plan. I urge the Department to think carefully about the legal, environmental, management and public access consequences of a change to issuing leases. There would be significant management issues should Club Hutt licences be changed to leases.
- f) At Turoa Ski-field areas like carparks, snow making and even restaurants are not exclusive to customers of the Ski-field Licence holder. For example; the general public are permitted to use carparks even if not skiing. General public are entitled to use restaurants for shelter, rest, eat their lunch or use the toilet facilities. This is outlined in the Turoa Ski-field Management Plan and also the Ski-field Licence held by RAL. These issues appear to be overlooked by the Department?
- g) As indicated in (f) above there are many issues of **public access** affected by the proposed change to leases. Section 49 (c) of the National Parks Act 1980 allows concessions to be granted, but protects the rights of the public. Public access is a fundamental right under the National Parks Act 1980. This is strongly reflected in TNP Management Planning and issuing of Ski-field Licences. In particular, I draw your attention to the following clauses; all of which indicate the appropriateness of facilities being licenced and not leased in order to recognise Public Access.

5.2.1 (d) Management of Existing Ski-fields

5.2.3 Base Area Strategies – Policy 3

5.2.7 Cafeterias and Day Shelter

5.2.13 Public Safety

5.2.14 Public Access to the Ski-field

Issuing leases as proposed would be a direct contravention of the rights held by the public under the current National Parks Act 1980 and the TNP Management Plan and Ski-field Licence.

There would be additional administration costs to both the Ski-field licence holder and the Department should a mix of licence and leases be granted. The Government has consistently stated their desire to reduce compliance costs.

Secondly setting an appropriate concession fee will be much more complex using a mix of Ski-field licence fee and lease fees.

Clause 5.2.6 Ski Area Licence Areas should remind the Department that ski-field services are required to be integrated and should take a holistic approach to managing the ski-field as a part of managing Tongariro National Park.

4) Protection of the Turoa Alpine Flush (TAF) and Upper Mangawhero Stream

I emphasise the importance to protect these two areas. The TNP Management Plan spells out their values and the measures to be taken to ensure their protection. They are excluded from the Amenities Area in recognition of this.

Section 4.1.3 of the TNP Management Plan emphasises how Tongariro National Park is a World Heritage Site based on the natural landscape values and they need to be retained in perpetuity.

Policy 5.1.1 **Turoa Ski-field Natural Values** emphasises the value of the TAF and Upper Mangawhero Stream and associated Map 11 shows its exclusion from the Amenities Area.

Policy 5.2.3 **Base Area Strategies** further explains this and **Policy 4** how it should be protected.

Creating a lease for facilities and structures in the Ski-field Base area would **increase** the risk of additional degradation to the TAF in particular. Degradation to the TAF has occurred over the years as a result of an illegal building intrusion, gravel run off and its use when there has been inadequate snow cover. The proposed lease with its significant increase in size needlessly increases the likelihood of these impacts. In particular the intention to further develop access to the Park Lane Chair, increase the size of the cafeteria by twenty per cent, and the development of a snow farm are concerns.

It is not adequately explained what a snow farm is and how any environmental risks will be mitigated?

5) Removal of Facilities

I welcome the intention of Pure Turoa to not replace the chairlifts that are to be removed. I note this work is to be funded by DOC. I would like to stress the need for this work to be carried out to the highest environmental standards under the direction and supervision of someone suitably qualified and experienced.

6) Aircraft use Application

I am concerned at the broad increase of planned helicopter use and intention to use drones, as a daily occurrence. There are significantly additional impacts – visual and noise here and I ask that DOC limit the use of aircraft and/or drones as to what is stated in the TNP Management Plan.

I would like to be heard in support of my submission.

Paul Green

Sec 9(2)(a)

[Redacted]



SUB 75

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

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	Branislav Petricek
Organisation	
Date	31.01.2023

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 endorse the Pure Turoa application and hope to maintain and ideally expand skiing capacity. The Department of Conservation should not grant exclusive decision-making or veto powers regarding this application to individuals, organizations, or any stakeholders based solely on their racial affiliation or religious beliefs.

My reasons for my objection or submission are:

Support and hope for long term viable skiing and snowboarding in the Turoa area.

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.



A. Permission Application Number and Name of Applicant SUB 76

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	Mark Armstrong
Organisation	
Date	30 January 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:

In relation to the Pure Turoa Limited (PTL) application:

- The paucity of financial information provided. DOC, for some reason, has allowed the public version of PTL's application to be issued with redactions at Appendix 7, the iwi engagement section, as well as other redactions that make it impossible for me to determine whether PTL's application makes commercial sense, or whether it is the best outcome for the taxpayer.
- The lack of information on DOC's (i.e. taxpayer) contingent and actual liabilities under the proposed PTL arrangement, as well as the counter factual.
- The lack of information on MBIE's (i.e. taxpayer) contingent and actual liabilities under the proposed PTL arrangement, as well as the counter factual.
- The extensive redaction of names, where in many cases (e.g. names of the PTL directors) this information is a matter of public record. It strikes to the credibility of PTL's submission that it would do this when it ought reasonably to know information was in the public domain.

In relation to DOC's approach:

- It is unclear whether there is any alternate credible bidder, or what DOC's counter factual is that benches PTL's proposal as offering the highest value to the Crown and the taxpayer.
- It is unclear what funding &/or debt forgiveness DOC is proposing in relation to PTL's proposal.
- It is unclear what funding &/or debt forgiveness MBIE, or any other government agency, is proposing in relation to PTL's proposal.
- It seems DOC is unaware MBIE is managing the decommissioning the Tui oil field after the operator went into receivership and left the Crown as last person standing (see link at www.mbie.govt.nz/building-and-energy/energy-and-natural-resources/tui-project/), and has not factored this into its view of the PTL application.

It is therefore unclear whether PTL's application represents the best value for the Crown and the taxpayer.

My reasons for my objection or submission are:

PTL's business case deals with how it will manage its future which assumes of course the redacted numbers are credible, which off the information provided I cannot tell. PTL, and for that matter DOC, does not deal with the Crown's contingent and actual liabilities under the proposed PTL arrangement.

DOC has not provided a counter factual to assess the relative merits of PTL's proposal against a credible alternative.

PTL's redaction of names is ridiculous when the following examples are matters of public record. As examples:

- Registered office (page 4 of 8), the PTL directors (page 14/32, page 46) and the LA4 directors at page 118 & elsewhere. In both cases, the Companies Office records show there are only two directors, so it is no secret who signed both reports.
- The person's name at page 204 is a matter of record yet is deleted.
- The RAL CE's name is also matter of public record yet is deleted (pages 164, 220, 264 & elsewhere)
- The RAL directors who signed the variation of concession document at page 277 are a matter of record yet deleted, but the DOC people's names are not. So clearly the Privacy Act is not a concern for PTL.
- The 2014 PWC report at pages 163 to 195 is in the public domain – so I do not understand why the names have been deleted unless PTL, or perhaps PWC, has something to hide.

PTL's business case, especially Appendix 7, seems to rely on the 2014 PWC report, which incidentally is about 10 years old and may be out of date. But there is nothing in the public version (apart from some capex values at page 29) that enable to two to be tied either to the 2014 numbers or the 2023 assumptions.

PTL does not address, and DOC seems not to have asked, what make good funding for any contingent or actual liabilities PTL has in the event it surrenders its proposed licence. Is the taxpayer back on the hook?

While it is hard to work out from PTL's submission, it seems the PTL business case is assuming a reduction in peak lift capacity of 18% (4,500/day down from 5,500/day at page 33), by retiring some lifts and upgrading others. It is accepted there will be less staff requirements with fewer lifts, but most of PTL's costs would be fixed rather than variable cost which implies a greater than 20% increase in lift fees. Whether this is sustainable is not addressed.

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.

Require PTL to:

- Resubmit with all redactions removed, unless there are in DOC’s (and not PTL’s or MBIE’s point of view) genuine reasons why certain details should remain redacted.
- Fully disclose its business case, including assumptions in Appendix 7
- Fully disclose its iwi consultation and iwi agreement (subject to the redaction comments above)
- Advise how it will handle make good for its contingent and actual liabilities in the event of early surrendering/termination or ending of the proposed licence.

Require DOC to:

- Fully disclose its assessment of the PTL application and DOC’s counterfactual assessment.
- Fully disclose the value of any benefits, including debt forgiveness, make good payments in relation to contingent and actual liabilities, etc, proposed to be made by DOC to PLT.
- Require MBIE to fully disclose its counterfactual assessment.
- Require MBIE to fully disclose the value of any benefits, including debt forgiveness, make good payments, in relation to contingent and actual liabilities, etc, proposed to be made by MBIE to PLT.
- Require MBIE to prepare and fully disclose a business case along the lines of “The Crown’s Approach to Decommissioning the Tui Oil Field in Response to Operator Tamarind Liquidation” (see link at www.mbie.govt.nz/dmsdocument/11505-the-crown-s-approach-to-decommissioning-the-tui-oil-field-in-response-to-operator-tamarind-liquidation-proactiverelease-pdf) that deals with the Crown’s contingent and actual liabilities in relation to make good.
- Basis MBIE’s business case above, require DOC to provide its estimate of the Crown’s:
 - Gross contingent and actual liabilities for make good assuming PTL’s application is declined.
 - Net contingent and actual liabilities for make good assuming PTL’s application is approved.

Re-start the consultation process once all the requirements above have been made available to submitters to enable submitters to evaluate the merits of PTL’s application with better information.

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
None		

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.

SUB 77

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
 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 Max Christopher Horon-Blithe

Organisation N/A

Date 31/1/24

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-SK1

F. Objection or submission

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

I totally support in full all aspects of the Pure Turoa application to take over Turoa ski field and its continued operations.

My reasons for my objection or submission are:

I am a life long skier who has seen the local economy grow and would like to see skiing continue in a sustainable manner at Turoa for the benefit of the local community, economy and skiers. RAL have shown themselves incapable of doing so and the RSSA are unable to unite the skiing community. Pure Turoa has a wide support base and experience

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 entire application should be accepted as submitted by Pure Turoa.

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
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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.

TO: mtruapehusubmissions@doc.govt.nz

Submission on the Pure Turoa application to transfer the licence to operate Turoa Ski field.

Pure Tūroa Limited 109883-SKI

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.

Person Submitting:

Karen Grimwade

Sec 9(2)(a)

Please note that this is a *personal* submission.

Contact Information

Sec 9(2)(a)

Statement of Support

I support the application by Pure Turoa in principle.

I would ask that the points outlined below are considered as part of the process.

Hearing Request

I would like to be heard – depending on the dates/my availability to attend.

I wish to speak to only one of the issues listed below – the protection of the Turoa Alpine Flush.

General principle of the running of ski fields

Tongariro National Park Management Plan states in Section 5.2.1 – under Objectives (d):

To ensure that the operations of ski areas does not adversely affect the experience of park visitors, the natural landscape and the biophysical environment beyond ski area boundaries.

This section really sums up my concerns and if it is adhered to – then I support the application.

Tongariro Taupo Conservation Management Strategy

States in Section 3.6 (commercial use) “Management of these ski fields is by way of concession licences.

In saying that, the following are two specific concerns I have;

Public Access

I have concerns about the plan to include ‘leases’ in the concession as this has the potential to impede public access. I am told that DOC MUST issue leases – as they have been given legal advice that this is the correct process. I question that legal advice is always ‘right’. Legal advice is often just ‘convenient’ for those giving it – and I would say probably not in the interest of park users. And that the leases have the potential to be difficult, expensive and most importantly impede public access.

Historically the licence to operate has been a ‘licence’. Leases are more complex to manage, administer and understand. There is potential for public access to be limited or discouraged if buildings, infrastructure, or outdoor areas are operated under a ‘lease’.

Public Access to National Parks/conservation land is a key pou in our democratic principles in New Zealand/Aotearoa. It would be a shame to undermine confidence in that principle.

The Tongariro National Park Management Plan refers in several places to the need for public shelter and public access.

Relevant Objectives:

TNPMP- 5.2.7 Objective (a)

To ensure that sheltered public space is available for skiers and other TNP visitors at the base areas.

TNPMP – 5.2.14 Objective (a)

TO maintain public access to those parts of the TNP that are ski areas.

Ensure continued protection of the Turoa Alpine Flush

The Turoa Alpine Flush (TAF) is excluded from the operations area. For good reason, as it is a special and fragile landscape. The level of protection offered to the TAF over the year has been varied. In the last three years there have been boundary markers installed, signage supplied by Project Tongariro and a general agreement among stakeholders to take better care of this special place.

Anything that imposes on the TAF (including the upper TAF along the Mangawhero stream) and the health of the Mangawhero Stream must be a 'no go'. The proposed snow farm and possible earthworks nearby are likely to cause damage. Other options should be considered.

The ski field management of recent years have been unable to adequately control sediment spilling into the upper and lower TAF. Provision for the protection of the Turoa Alpine Flush is outlined on page 220 of the TNP MP. Although careful monitoring of ski field construction and operations is allowed for in the TNP MP – this has not happened in recent years.

Water Quality is provided for in [section 5.2.8 Objective \(a\)](#)

[To protect water within TNP, as far as possible, in its natural state.](#)

An adjacent 'Snow Farm' is unlikely to enhance the Turoa Alpine Flush.

.....

I have two more points I would like to have the hearing committee consider – although more aimed at the Department of Conservation as administrators of the licence to operate, rather than the application to operate Turoa. But I would like to make note of them:

Removal of Infrastructure:

I would ask that all due care is taken in the removal of old infrastructure and the need to remove is taken into consideration – ie. Will removal do more damage than good?

The removal of the Nga Wai Heke is likely to impact on the flush at the South-East Basin. I would ask that extreme care be taken in this process – with close supervision of contractors.

Dark Sky Concept

Ruapehu District Council supports in principle the concept of Dark Sky. It is likely that this concept will be progressed in the near future. I would submit that this concept should be taken into consideration when planning buildings & lighting by any new operator. Lights can be aimed downward – led bulbs used and generally consideration taken to light pollution. The huge lights visible from Ohakune at Turoa – seem very unnecessary. This is a basic and easy way to further the principle of conservation on the maunga and likely to engender goodwill and set a good conservation example.

[DarkSky International | Protecting the night skies for present and future generations](#)

Karen Grimwade

Sec 9(2)(a) February 2024

To: mtruapehusubmissions@doc.govt.nz

SUB 79

Submission on the Application to transfer the Licence to Operate Pure Tūroa Limited 109883-SKI

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.

Entity Submitting: Project Tongariro (Tongariro Natural History Society)

Project Tongariro is a local conservation organisation that has carried out hands-on conservation on the Central Plateau/Tongariro Taupo rohe for the last 40 years. We as a conservation group are advocates for all local conservation and spend over a million dollar per year in pursuit of our conservation aims. Our core business is the care of Tongariro National Park and thus we wish to advocate for it on two main issues regarding the Pure Turoa application.

We are not usually a political or lobby organisation, but we feel strongly about the need to advocate for Tongariro National Park and are thus engaging in this process. We are strong supporters of strong planning and stress our wish to see the Tongariro National Park management plan principles adhered to. We would prefer to see an up-to-date CMS and TNP MP but without such, we advocate for the current one to be adhered to. We do not wish to see the integrity of the National Parks Act, nor the TNP Management Plan undermined by 'legal advice' and a move to leases.

Contact Information

Kiri Te Wano (CEO) e. Sec 9(2)(a)

Sec 9(2)(a)

Karen Grimwade (Executive) e Sec 9(2)(a)

[Redacted]

Statement of Support

Project Tongariro is not opposed to the transfer of the Licence to Operate to Pure Turoa to run Turoa Ski Field.

We understand that the TNPMP Objective (5.2.1d): *To ensure the operation of ski areas does not adversely affect the experience of park visitors, the natural landscape, and the biophysical environment beyond ski area boundaries.*

And outline below our concerns that this objective might be compromised;

Hearing Request

Yes please, we would like to be heard.

Project Tongariro Submission as follows;

Protection of the principle of Public Access

We, Project Tongariro executive, feel the proposed intention to use leases rather than a licence to operate is an alienation of public land and infers private ownership.

RAL have operated under licences to operate since 1953, and we question the need or reason for the legal advice for this to change. There is nothing in the National Parks Act that prevents the issue of a licence rather than a lease for the facilities outlined in the application. The CMS states that it should be a licence to operate (see references).

Transferring the licence maintains a precedence maintained since 1953. It also honours the TNPMP that has policy saying there will be a single licence on each ski field.

A licence minimises the area controlled by the licence holder to that which is strictly required to safely operate a ski field. This is important in a National Park. It safeguards both protection of the National Park and public access to the National Park.

In day-to-day operation, a lease could enable the operator/concession holder to exclude the public from shelter or access. Public Shelter is required to be provided (TNP MP Sections: Sections: 5.2.7, 5.2.14). If a lease is required, we request it should be buildings only and then only the footprint of the building – no further. And then there must be provision for Public Shelter as stated in the TNPMP. Access for other park users, such as trampers, climbers, ski tourers across public land should not be impeded by leases over out side areas (such as the Plaza). Public access to National Parks is a part of our culture and we strongly state our support for this principle to continue to be upheld by the landowner and the operator of the concession.

Administration of leases are likely to be more expensive for both parties. Multiple leases rather than one concession are likely to be problematic to ‘manage’. Why make administration more difficult and expensive? Government has spent millions buying out of leases whereby leases have been problematic to manage in various other instances. Also does this allow for the provision of sub-leases whereby the sub-lease may not be as accountable for public access. The lease of the Chateau Tongariro, and the cattle leases in the Dart Valley Mt Aspiring National Park, are examples of where a lease can go wrong and be very expensive for the public of New Zealand/Aotearoa.

Relevant sections of the Tongariro National Park Management Plan:

5.2.1: Management of Existing Ski Areas (Objectives)

5.2.3: Base Area Strategies

5.2.7: Public Shelter

5.2.14: Public Safety

Relevant section of the Tongariro Taupo CMS

3.6 Commercial Use.

Protection of the Turoa Alpine Flush (TAF)

Project Tongariro has an interest in seeing the continued projection of the Turoa Alpine Flush. The TAF has specific protection under the Tongariro National Park Management Plan and this area has always been excluded from the ski field amenities area.

Although protected, the TAF has had a hard time over the years, being trampled on and subject to the ingress of sediment – among other things. Over the last three years we have strongly advocated for its protection and funded boundary markers (to prevent the previous instances of boundary ‘creep’)

and boundary signs, along with an interpretation sign. We do not want to see further damage to the flush by the proposed development.

We are concerned at the proximity of the snowmaking farm, and the proposed earthworks at the drive stations. Without very careful management and monitoring, this will impact on the health of the TAF and the nearby Mangawhero stream. Although careful monitoring of ski field operations is provided for in the TNP MP and the CMS – this does not actually happen.

We include the Upper Turoa Alpine Flush in this concern – which is a flush area following the stream up the valley beside the Parklane Chairlift. Also at risk from construction and sediment runoff.

We would also advocate for the careful removal of old infrastructure, as another alpine flush in the South East Basin is likely to be impacted by the removal of the Nga Wai Heke.

Relevant sections of the Tongariro National Park Management Plan

5.2.3 Base Area Strategies

5.2.8: Water Uses and Snowmaking

Kiri Te Wano – Chief Executive

On behalf of the

Project Tongariro Executive Board

1st February 2024



A. Permission Application Number and Name of Applicant SUB 80

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	Michael Beech
Organisation	
Date	1/2/2024

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) I object to providing a concession for just the Turoa ski area thereby separating this ski area from the Whakapapa operation.
- 2) I object to the proposed length of the concession.
- 3) I object to the proposed concession because it doesn't best serve the interests of all stakeholders of the ski areas and the national park.

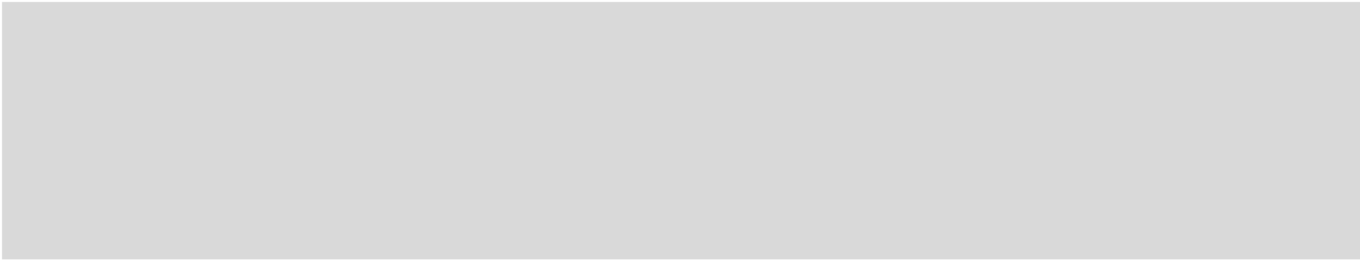
My reasons for my objection or submission are:

- 1) It does not make sense to split the two existing ski area operations (Turoa and Whakapapa) into separate entities. Successful management of these ski area operations is very difficult for many reasons that I'm sure you are already aware of, so I will not repeat them here. Having the two ski areas continue as one entity (either managed in the current form by RAL or by a new owner) will give the best opportunity for long term financial survival of the ski areas. Prior to RAL purchasing Turoa it had been managed as a for profit enterprise and had twice become insolvent and failed – if Turoa is again separated as a standalone entity the chances of this failure repeating is very high. Having the two ski areas remain as one enterprise creates synergies that greatly improve the chances of long-term financial survival. In particular the SkyWaka gondola on the Whakapapa ski area is a significant source of non-ski season revenue that will play an important role in the financial survival of the future operations – if Turoa is separated from Whakapapa and cut off from this source of revenue this greatly reduces the chances of financial survival for Turoa. The long-term financial success of the business is important if the operation is to best serve the stakeholder community. A financially successful operation will also have more resources to ensure they do their best to protect the natural environment within the concession area. DOC should not issue a concession to operate in the national park unless they have high confidence of long-term financial success.
- 2) Successfully managing a ski area operation requires long term planning and strategy. 10 years is far too short to allow the necessary long-term focus and far too short for investors to have confidence to provide capital. My understanding is that the existing RAL concession is for 60 years – this is a much more realistic timeframe to give a genuine chance of long-term success for the operation.
- 3) As I'm sure DOC is well aware there are many different stakeholders in the existing ski areas and interested parties with respect to the use of the natural assets in the national park, including multiple iwi groups. Managing and considering all of these different interests is complex and time consuming. In order to manage this process as effectively and efficiently as possible it makes sense to just have one party with one concession for operating both ski areas.

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 cannot support a concession application that is for running just one ski area thereby splitting the existing operation in two. If Pure Turoa wish to bid for the purchase of the whole business including both ski areas and thereby change their concession application to be for both ski areas I would no longer oppose their application.



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 81

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	Sarah Churchill
Organisation	
Date	2.2.2024

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:

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.



A. Permission Application Number and Name of Applicant SUB 82

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	Shaun Churchill
Organisation	
Date	2.2.2024

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:

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.



A. Permission Application Number and Name of Applicant SUB 83

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	Wayne D Grattan
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:

The appointment of Pure Turoa Ltd (PTL) as the holder of a lease and licence to operate Turoa ski area and associated activities in Tongariro National Park

My reasons for my objection or submission are:

I support the granting of a lease or licence as outlined generally in this application however there is no evidence that PTL has the resources or experience to operate any lease or licence if granted.

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.

Decline this application

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
PTL Organisational Issues	word	Bullet points in support of my submission

How do I submit my objection or submission?

Pure Turoa Ltd (PTL) Organisational Issues

1. PTL is an unlisted (private) company registered in New Zealand with 2 directors and effectively 2 shareholders. There is no information available, including from this application, which shows that either party has been involved in the governance or management of a large company here in New Zealand or overseas.
2. While the application states that an Advisory Board has been appointed there is no recourse to this Board in the event of a failure, financial or otherwise. They remain, as the title describes, an advisory part of any legal structure.
3. Ski fields are inherently risky operations and operators therefore need to be able to call on significant resources, financial and otherwise, to cover this risk. There is no evidence that these resources are available or that if available that they have been or will be committed to this lease.
4. A failure from PTL, financial or operational, will leave the Crown exposed to the risk of significant liability. This risk is compounded by the lack of experience of both the Crown and PTL.
5. The information provided purports to show the applicants have an historical involvement with Ruapehu, Turoa and Ohakune. While laudable this does not show that the applicants have sufficient experience to operate a ski field, or the associated activities being applied for. Turoa as a ski field is subject to climatic extremes that make day to day operations very weather dependent. Lives are dependent on the decisions made as to how and when to operate. The implications of these decision fundamentally rest with the Board and are underpinned by the overall decision made as to investment and operating parameters.
6. In addition, ski fields are seasonal, and skiing is discretionary expenditure also now competing with an independent operation at Whakapapa to entice the skiers required to sustain financial viability. You would expect to see such an operation backed by very experience corporate directors, a locked in management team and shareholders with significant free cash resources and a locked in commitment to sustained funding to underwrite the losses that will occur from time to time.
7. A failure, financial or operational will leave DOC, the community and the Crown generally, exposed to significant risk:
 - a. Reputationally - tourism is a large part of our economy and skiing is an international sport
 - b. Internationally - White Island by way of example where the disaster was international news and the failures have reverberated globally

- c. Financially - Pike River where the Crown has been required to pick up the cost (and the risk)
 - d. Environmentally e.g. a fuel leak is a recent example of the community exposure to open ended risk
 - e. Politically – the incident at Cave Creek had a significant negative impact on DOC and the Crown (as well as those personally involved) which still resonates today some 28 years on
 - f. Health and Safety
8. The application overstates the importance of people and organisations who are peripheral to, but not actually party to, the licence. This appears to be an attempt to cover for the shortfalls in experience and resources noted above. For example, section 3.1. advises that PTL was formed by a team of people including business owners, ski field operators, management and finance professionals. None of these people are associated directly with PTL nor does PTL have staff resources in place to operate a major ski field with the associated significant financial, operational and marketing requirements.
9. There is also significant information provided with the application that is generic to the region, the park or past operation of the ski field. While interesting it is not relevant to what is proposed for the future. Nor is it specific to how PTL might operate. Section 4,5 and 6 refers.
10. Section 3.4 of the application briefly covers some of the operational risks and attempts to downplay these by advising that PTL has “built an experienced executive and operational team, many with many years’ experience on Mt Ruapehu”. The reality appears to be that PTL does not have these staff on its payroll nor have contracts signed that secure these services.
11. Section 3.4 also enlightens that the Crown via Kanoa will own a 25% shareholding in PTL. There is no evidence that Kanoa have any experience in ski field operations nor that the proposed equity and Board representation will give it more than token/minority rights input. The risk is that a Crown shareholding will further expose the Crown to significant ongoing financial and operational risk with no control and insufficient experience.
12. Kanoa accepting bids and participating in the receivership/liquidation also leaves the Crown exposed to a charge and legal claim arising from its failure to act impartially and/or to declare a conflict of interest and recuse itself from the process.



A. Permission Application Number and Name of Applicant SUB 84

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	Haigan Murray
Organisation	
Date	2 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 reasons for my objection or submission are:

I support the application of Pure Turoa Ltd Turoa Ski Field Concession Application in its entirety, as being in the best interests of balancing the north island winter sport opportunity with the public access to and conservation of the national park in which t Pure Turoa Ltd will operate.

I am satisfied that Pure Turoa Ltd are able to comply with and uphold both the terms and the wider aims of the concession in the best interests of all stakeholders.

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?



A. Permission Application Number and Name of Applicant SUB 85

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

Christian Williams

Organisation

Date

02/02/2024

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:

The Overall application, but particularly pertaining to section 4.2.

My reasons for my objection or submission are:

My primary objection to this application relate to my concerns around Crown-Iwi relations. Various Iwi (particularly Ngati Rangi and Uenuku) with links to Ruapehu have expressed their concerns about the speed and pressure this process is under. It has not been done according to what was agreed within Te Tiriti o Waitangi. This Maunga is sacred to the central North Island iwi and as they are still in the process of treaty settlements, rushing through a new concession for a private company will prejudice and complicate that treaty settlement process. The current claim is likely to result in a co-governance approach. While PTL state they are happy to work in partnership, a new concession at this time will complicate things and PTL will likely be resistant to giving up genuine decision making if it impacts on their bottom line.

As there is an existing concession in place, a better approach would be to maintain the concession with RAL until the treaty settlement process (Wai 1130) is complete.

I am of Pākeha ancestry, however I have spent my life skiing on Whakapapa and Turoa. I would rather lose access to the ski fields than have any further injustices pushed through on the local Māori people. If they do support the PTL concession in full, then I support their wishes, however from what I have read, that sounds unlikely and therefore their voice should be heard and heeded.

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.

Unless local Iwi give full support to the concession, then the application should be declined.

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

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 86

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	Athul Harris
Organisation	NA
Date	2/02/2024

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:

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.



A. Permission Application Number and Name of Applicant **SUB 87**

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

BRUCE STOCKWELL

Organisation

Date

02/02/24

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:

[Redacted area]

My reasons for my objection or submission are:

THE CONTINUED VIABILITY AND ECONOMIC AND SOCIAL SUSTAINABILITY ARE DIRECTLY LINKED TO CONTINUED VIABILITY OF TUROA SKI AREA. THE CONTINUED DEDICATION OF SHAREHOLDERS OF PTL IN FACE OF SIGNIFICANT ADVERSITY IS HIGHLY COMMENDABLE. TUROA AND THEREFORE OHAKUNE MUST BE SEPARATE FROM FATE OF WHAKAPAPA.

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.

[Redacted area]

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
[Redacted]	[Redacted]	[Redacted]

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 88

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	Stephen Harwood
Organisation	Personal
Date	02-02-2024

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 fully support the application by Pure Turoa Ltd for the continued operation of a commercial ski field at Turoa on Mount Ruapehu.

My reasons for my objection or submission are:

The continued operation of Turoa is financially important for the whole of the Central Plateau area, the ski field provides hundreds of jobs and is a major attraction for both domestic and international visitors. If the application were to be refused this would result all North Island skiers having to travel to the South Island creating further impact on the ski fields operating on Doc land (land belonging to the public of New Zealand) and having an even greater environmental impact through more plane travel. The application should be approved and the removal of the existing ski field infrastructure built up over decades would create much greater physical impacts on the Mountain than allowing the continued operation which other than vehicle movements on the roads involves activity on what is a temporary surface (snow) which is refreshed by mother nature every year.

The land managed by Doc is preserved for the use of all New Zealanders and is not to be locked away to only look at – the great outdoors and access to them is a right for all of us and the continued operation of the Turoa ski field is the right choice for this location – everything is in place for its continued operation so permission should be granted.

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 to continue operation of a ski field at Turoa should be approved, with an allowance to improve the ski field and infrastructure as is required to maintain a world class ski feild.

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 89

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	Sheryl Helliwell
Organisation	
Date	02 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 reasons for my objection or submission are:

I support all of the hard work that has gone into re-establishing a viable tourist area. Ohakune should be proud.

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.



A. Permission Application Number and Name of Applicant SUB 90

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	Michael Corkill
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:

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

My reasons for my 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 at-least 20 years, 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, Wintergarden 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:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area
2. 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.
3. 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

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

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

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

Organisation

Philip Couch

Date

2.2.24

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:

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

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 92

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	Andy Haslett
Organisation	
Date	2 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:

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

My reasons for my 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 1980, 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, Wintergarden 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:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area
2. 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.
3. 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

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 93

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	Aidan Knox
Organisation	
Date	03/02/24

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:

I am in support of the whole application.

My reasons for my objection or submission are:

The forward thinking of the application and community involvement underlies why this application should be granted. Ohakune and surrounding towns need this ski field. The community benefits, Ohakune housing market remains positive and prices remain stable, employment within the town is still available and with the application being granted the whole country benefits from this.

No one can afford for the surrounding towns and local businesses to be further affected by the uncertainty or what is happening with the ski field and Pure Turoa have demonstrated that they have a solid plan and one that benefits everyone.

To imagine no ski field and the devastating impact that would have on the community is something that would impact so many and would have huge financial ramifications.

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

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 94

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	Suzienne Slegers
Organisation	-
Date	03.02.2024

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 support the granting of the concession to Pure Turoa Limited in its entirety for at least 10 years.

My reasons for my objection or submission are:

The proposal provides for public use and enjoyment of Tongariro National Park while maintaining its preservation in perpetuity.

I have been a life pass holder and shareholder in Ruapehu Alpine Lifts (in liquidation), ^{Sec 9(2)} _(a) and know that the continued operation of the Turoa Ski Area will secure significant ongoing benefit for central north island communities.

The continued operation of Turoa Ski Area is consistent with the General Policies for National Parks 2005, Conservation Act 1987, National Parks Act 1980, Tongariro Taupo Conservation Management Strategy 2002-2012 and the Tongariro National Parks Management Plan.

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.

Condition to ensure that free public access to and through the plaza area is maintained.

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 95

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 Eley, Chairperson
Organisation	Horopito Residents & Ratepayers Society Incorporated
Date	03Feb2024

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:

All parts

My reasons for my objection or submission are:

The Horopito Residents and Ratepayers Society was incorporated to represent the residents of Horopito, to foster and promote the interests and wellbeing of the ratepayers and supporters of the township of Horopito.

The Society's Management Committee has voted unanimously to support Pure Tūroa Limited's concession application.

Tūroa represents a major pillar of life in Horopito. Many of our visitors and residents' decision to visit or live in Horopito is strongly connected to Tūroa and its operation as ski area. It is an area we are connected to for work, play, our livelihoods, as well as a place we are deeply connected to emotionally. If Tūroa were to close the impact on Horopito would be significant and detrimental.

We believe Pure Tūroa Limited's plans to be consistent with good management and custodianship of the Tongariro National Park.

We believe Pure Tūroa Limited's to be the most/only viable option for Tūroa. Further reviews, waiting on other matters, or other delays are likely to place the operation of Tūroa by anyone in jeopardy.

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.

We submit that DOC grant the concessions sought by Pure Tūroa Limited in their entirety.

We also submit that DOC do so as quickly as possible. The effects of the delays and uncertainty we have experienced since RAL went into liquidation have been massive and negative for our area. Any further waiting on other matters, further reviews or other delays will jeopardise the likelihood of Tūroa as a ski area and have a profound impact on our region.

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 96

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	Ana-Maria Mocanu
Organisation	
Date	03 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:

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

My reasons for my submission are:

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

- I have a strong connection to the mountains of Tongariro National Park^{Sec 9(2)(a)} and I enjoy skiing/snowboarding, tramping and mountaineering as forms of recreation together with my family and many of my friends. I am a regular and respectful visitor of the TNP, I visit there almost every weekend in the winter and it's my favorite thing 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, Wintergarden 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:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area
2. 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.
3. 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

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 97

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 Jones
Organisation	
Date	3/02/24

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:

I support the full plan of Pure Turo Ltd

My reasons for my objection or submission are:

There needs to be a reliable company supporting the community and the field to support snow sports in the north island. With out this moko, whanau and friends will miss out on the fun and exciting experience of snow sports in the north island.

NOTE: Being a LPH I have no hesitation in giving this up for the better good of skiing in the north island. I don't support the LPH group or RSSA and what they stand for.

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 Support the PTL application 100% and feel nothing needs to be changed.

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?

A. Permission Application Number and Name of Applicant SUB 98

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	Grant Fleming
Organisation	Private individual
Date	Feb 3, 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 support Pure Turoa's applications for concessions to operate on Mt Ruapehu so snow sports can continue to operate on the current Turoa snow field.

My reasons for my objection or submission are:

I believe Pure Turoa's concession application, vision and plan for the Turoa snow field is an opportunity to recapitalise the operation and run it on a more sustainable basis, allowing access to this incredible part of New Zealand for current and future generations of skiers, snowboarders and other alpine enthusiasts. Furthermore I believe they provide the best chance of upgrading and improving the operation of the field. Through the ongoing existence of the snow field I believe many thousands of New Zealanders develop a passion for our alpine spaces and as a result want to protect and conserve these, which has a broad benefit for NZ's alpine environments.

I think it is highly unlikely that the snow field can be run as a non-profit operation – as suggested by the RSSA. This is a challenging operation in a challenging environment and organisational structure and governance needs to be as simple as possible to allow good decisions to be made in a timely manner and also to provide access to the capital Turoa needs to run sustainably for future generations. The individuals involved in Pure Turoa appear to have experience and credibility and a real commitment to the maunga.

I believe granting Pure Turoa a concession so they can run Turoa is also the best way forward of securing the livelihoods of many in the local communities surrounding the maunga and the broad economic benefits that accrue to the wider region as a result of the snow field. These benefits are important to ensuring the local communities can thrive.

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 don't seek any amendments, but support Pure Turoa's aspiration to have a longer concession so they can make long-term plans and investments with certainty.

G. Attachments

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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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A. Permission Application Number and Name of Applicant SUB 99

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	William Nagle
Organisation	
Date	03 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:

Effects on the Biological Environment

My reasons for my objection or submission are:

This application is being processed with undue haste.

Citizens were presented with a 277 page application which is not readily indexed.

It is unreasonable to expect citizens without professional expertise to analyse such a dog's breakfast of a document and make a coherent submission.

Much of the ecological information is decades old and there is no comparison of areas within and without the skifield boundaries.

It is clear that any native biodiversity that survives on Ruapehu maunga has special qualities to withstand extreme temperatures, volcanic activity and disparate communities. Those species need protection and restoration.

The general nature of information supplied for developments of "snow play areas" and "summer activities" is not acceptable.

Scant attention is being paid to the introduction of invasive species with the plans for "summer activities".

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 conditions I would like to see are -

Monitoring of native biodiversity within and without the ski area and remedial or restorative actions where necessary.

Particular attention paid to the health of populations of 'At Risk' species or Species of Significance.

"Snow play areas" must avoid alpine flushes and sensitive habitat.

"Summer activities" must not include cycling. The alpine environment, in particular soils, is not robust enough to withstand wheels. Mountain bikers throughout Aotearoa have shown scant respect for built tracks and search out thrills.

Any extension to the Alpine Café or Alpine Meadow areas must not cause any further damage to the alpine flush immediately adjacent. The alpine flush should be fenced to prevent inadvertent or deliberate damage.

Early detection of invasive species and a rapid response to deal with them must be part of any broadening of 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'.

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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A. Permission Application Number and Name of Applicant **SUB 100**

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	Kendra Mower
Organisation	Aria Logging Ltd
Date	3/2/2024

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:

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

My reasons for my 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 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 we love the recreational activities on the mountain ^{Sec 9(2)(a)}.
- 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, Wintergarden 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:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area
2. 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.
3. 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

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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