



A. Permission Application Number and Name of Applicant **SUB 351**

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	Nigel Little
Organisation	
Date	09/02/24

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

All

My reasons for my objection or submission are:

Skifields are a high risk, capital-intensive business – nowhere more so than on the highly weather exposed Mt Ruapehu. Turoa in particular has suffered from years of under investment, and it appears unlikely that any organisation will have the capital reserves and risk appetite to purchase both fields at Ruapehu.

Therefore I support this application on the basis that the submitter is a local organisation committed to the upgrading and continuation of the Turoa skifield with a clear vested interest in seeing it continue to operate.

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'.

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Printed name of submitter or person authorised on behalf of submitter	Richard Stalker
Organisation	
Date	9/2/2024

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- 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 a lease and licence of at least 10 years for Pure Turoa Ltd

My reasons for my objection or submission are:

There needs to be a long term lease to provide long term thinking and long term solutions. Skiing on the maunga is intergenerational, as are the iwi connections to the mountain.

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.

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F. Objection or submission

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

The concession is only for 10 years.
No proof that PTL will be financially sound
Excludes other assets – Whakapapa ski field
Proposed reduction of lifts resulting in reduced skier capacity numbers

My reasons for my objection or submission are:

The short term of the concession doesn't allow for long-term commitment to the operation of PTL.

New businesses can take 5-7 years to be commercially viable

The reduction of lifts shows poor knowledge around good ski field design and will put the beginners with the more advanced skiers while will increase risks of accidents, as well as long lift queues. On a good day having 3000+ skiers all on the same two lifts makes no sense. Upgrading the current lifts would make more sense.

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

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.

Reject any privatisation/ sale of RAL ski area assets. The crown to retain the existing concessions. Crown to engage in good faith with iwi and the wider community to run the ski areas to best industry practice, to allow the time and safe working relationship for TNP claims to be settled.

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

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

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Printed name of submitter or person authorised on behalf of submitter

Shaun Galway

Organisation

Date

09/02/2024

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F. Objection or submission

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

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

My reasons for my objection or submission are:

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

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

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

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

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

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

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

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

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

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

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

6. Past concessions negotiations took around four years.

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

7. Key information has not been provided.

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

Iwi engagement has been completely redacted.

I do feel more consultation is required as the deal with PTL under labour was not seen as good exercise more of a backroom deal.

Some locals support PTL and some don't, as a taxpayer and skier I don't know who they are, I don't know what experience they have in running a mountain, with the removal of lifts shows me they actually don't have the right knowledge.

One of my concerns is, as a Health & Safety Professional myself, what background in ski field management do PTL have in running a ski field. PTL will need to provide a bit more documentation on what they are doing it is all very shady right now. Transparency is what is required, this whole thing could become a nothing if the new government took the reins and said lets get going, and not selling to PTL.

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

- Any concession needs to be for a longer period of time (minimum 40 years).
- Any concession needs to show partnership and/or endorsement from mana whenua. Cease ignoring iwi and retract from seeking new concessions, as they have said they will not approve new concessions until Treaty claims are settled on the Maunga.
- Keeping the existing RAL concession in place provides a safe working relationship while the TNP treaty claims are being negotiated between the Government and various iwi interests over coming years.
- Any concession should be for the whole mountain, being Whakapapa and Tūroa.
- Any concession needs to show active consideration of ongoing accessibility (including socio-economic) to the
- Operation within this National Park. Especially as a non-profit operator is seen as being more compatible with public access to a National Park environment.

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A. Permission Application Number and Name of Applicant SUB 355

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter

Reid Mossman

Organisation

Long Time Fields User

Date

09-02-2224

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.
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F. Objection or submission

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

While there is two fields that are of public interest and a legacy for a not for profit system that has been operating for 75 odd years. This isn't the way to give an entity a five year lease while there is so much else going on in the public interest with this mountain and this hasn't been consulted on fully and openly , the cards have been held close and tight by Govt Departments – Poorly handled and not in the public interest.

I don't think Pure Turoa has been open enough in the public realm to satisfy the general NZ Public and community that they are a viable alternative. Financially long term or otherwise.

It was the Government of NZ who got this mountain into strife along with the Past Directors of RAL and Poor Management.

I object because RAL could have its dept. forgiven and be restructured in the public interest with full consultation and less expense than this fiasco currently.

Pure Turoa is not the best option currently also given the recent news of whakapapa bidders withdrawing.

Pure Turoa and the Govt departments handling this don't have the long term interest in hand and this should not be given a lease currently.

My reasons for my objection or submission are:

As above more open discussion and forgiveness of dept should be the highest consideration and a well thought out path discussed with the possibility of RAL continuing in the same format (not for profit) with a new operating team from Past.

I have no issue with the current management of RAL in Liquidation.

Trade it out.

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.

Don't Bring an outsider into and split the sides of the mountain. Between different origination's.

Forgive the Dept.

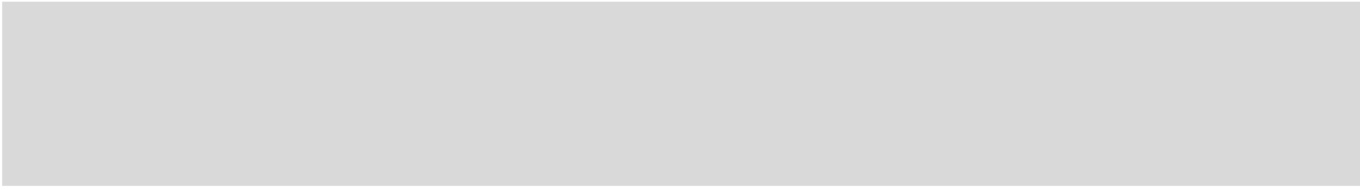
Restructure RAL into a new professional management team

Keep the not for profit system that has worked mostly well for its entirety.

Keep MiBI on a tighter lead as they've shown they have no idea and have cost more money.

Get local involvement like RESSA iwi Ral together and have a public forum and talk about the possibilities without grrred.

Keep whakapapa and turoa under the same structure. Put in a statutory diverse board of managers in place voted by the public/



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Organisation

Date

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

My reasons for my objection or submission are:

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

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

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

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

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

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

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

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

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

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

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

6. Past concessions negotiations took around four years.

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

7. Key information has not been provided.

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

Iwi engagement has been completely redacted.

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

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

Will the private ownership drive environmental damage to the park through the drive for profits.

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

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

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

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

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

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From: [Murray Wilson](#)
To: [Mtruapehusubmissions](#)
Subject: Pure Turoa Limited Concession Application
Date: Friday, 9 February 2024 11:49:35 am

SUB 357

You don't often get email from [Sec 9\(2\)\(a\)](#). [Learn why this is important](#)

I support the application in principle to allow for winter and summer activities
But have concerns about some details.

Licence

The 10 year period is unrealistic for a substantial long-term investment. The current licence is a 60 year one and there is no evidence for such a dramatic reduction in the proposed term.

Lease

It is unclear for the need for a lease. Concessions have operated for many years successfully without a lease. It seems that this becomes another bureaucratic impediment without any practical application. The aspects of safety should be covered by the day-to-day operations and not by a lease. I do not support the need for a lease when a licence should be satisfactory.

The Alpine Flush

This protected area being situated so close to many activities needs specific protection in the concession arrangements. Particularly when developments of extending the Alpine Cafe floor area by 20% (which way?) and the possible siting of the Snow Factory and additions to the beginner's area.

Company Structure

Important details have been redacted without reason. These details are important to the integrity of the whole concession and the public is expected to rely on the advice of paid consultants. This is not good disclosure on such a major issue in the TNP.

Summer Activities

Are there any details on this as it may have an impact on the amenities area and surrounding areas of the TNP? It would be good to have this information when considering the details of the licence of the TNP.

Dark Sky Initiative

Ruapehu District Council agreed to a proposal of mine to prepare a Dark Sky Strategy for the Ruapehu District in 2021. So far it has published information on its website and there is a great opportunity for Pure Turoa to adopt any practical means to protect our naturally dark night sky when replacing or installing lighting. Using LED lights and controlling the dispersal of upward and sideways light and excessive use would be a good start. There are commercial opportunities for dark sky tours with the Maori cultural significance of the heavens could be included in a summer programme.

<https://www.ruapehudc.govt.nz/our-district/dark-sky-ruapehu>

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

Regards

Murray Wilson

Sec 9(2)(a)

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Printed name of submitter or person authorised on behalf of submitter	Helen Coyte
Organisation	
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
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E. Hearing Request

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

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

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Printed name of submitter or person authorised on behalf of submitter

Scott Cursons

Organisation

Date

06/02/2024

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- 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. Economically it doesn't work for Pure Turoa
2. Splitting the two RAL ski fields
3. Reduction in the number of Ski lifts
4. The lack of transparency in the application to the public, the Creditors, the Shareholders
5. Adherence, commitment, and method of application to the Tongariro National Park Management Plan
6. Adherence to the Treaty of Waitangi
7. Commitment to working with all Iwi
8. Only one concession applicant
9. Concession application timeframe – Pure Turoas expectation that it will just go through quickly.

My reasons for my objection or submission are:

I write this objection on Waitangi Day. How appropriate.

I seek a holistic and all-encompassing solution to this situation. One that encompasses the whole of the Tongariro National Park, the agreements presently governing all decisions that consider all the requirements of the Tongariro National Park Management Plan and the Treaty of Waitangi. Considerations must be made of the Iwi who reside at the foot of the mountain as a group, all with valid needs and requirements that consider their spiritual and economic needs of their people. Many people, young and old, are employed directly and indirectly by the activities on the mountain, their water is affected by the commercial operations of the present concession holders. The beginning and end of commercial operations on the mountain must include Iwi at 'every' level. The only solution I see is a multi-Iwi led takeover of the present RAL company.

This would be the simplest solution, the cheapest for the Government, the most holistic for the environment and economically the best chance of a long-term successful outcome for both Ski-fields and the National Park as a whole. With Iwi involved at every level, the pristine alpine environment can be sustained and it's in the Iwi's best interest spiritually, economically and environmentally to do so - 'Rangatiratanga'.

What I see with the Pure Turoa application is a bunch of businesspeople trying to make it work (nice try team) however a bunch of businesses rallying around to try to make it work is one thing; it is another to successfully make it grow. The public/creditors/shareholders have not been presented with a transparent plan of their application, that clearly defines how they will do it, how they will pay for it and how they will invest in the future operations. The evidence is clear, they will reduce the operation to only a few lifts, to save money, they are not committed to the status quo of operations and seem to only commit to 10 years operation. The details are too few, the vagueness of their application to share with the public/creditors/shareholders leaves me with dis-trust of their intentions. I am concerned at the type of governance that Pure Turoa seems to project, due to a lack of transparency, a lack of a solid plan and most importantly a solid inclusion of Iwi at all levels of the operation – most importantly at executive level – embedding them in governance. It is my opinion that Pure Turoa will come to trouble within five years of their tenure. History has shown, and this is well documented, that a Corporate model of operation will fail. And when that happens, who will pick up the pieces and who will pay for the resumption of operations – or remove the plant and fixtures? Just because Pure Turoa has made an application – the only application, it is not a reason for the Government to approve it.

Economically there are challenging aspects that no other New Zealand Ski field operators have to consider such as; Dual World Heritage Site, National Park, Active Volcanism, Tangata Whenua living around the mountain who are spiritually connected. No other ski fields in New Zealand have these unique characteristics – and this is why the likes of NZSki haven't come to the table. Ruapehu is unique, it is special and because of this a special outcome is required – one that the New Zealand Government must make happen. I note that Whakapapa Holdings has now also pulled the pin – due to not being workable.

Splitting the two ski fields provides no benefit to the operator(s) and in fact it means greater expense as there are less economies of scale; more staff required, more equipment, more vehicles, more impact on the environment because those very specific items – will no-longer be shared between the two fields. It is more efficient in every way and more flexible to operate the two ski fields together.

Reducing the number of ski lifts actually intensifies the activity into a smaller corridor, more damage will occur, there will be more accidents as skiers/snowboarders are crammed into the smaller space. The existing lifts have been provided for, have concessions to run and provide excellent coverage. The present footprint with all the lifts allows the operator to make enough to operate. Reducing the number of lifts - will reduce the viability of the operation and set it to fail. If Pure Turoa decides to not operate certain lifts then they need to be removed, the footprint reduced, the environmental impact reduced. Who will be paying for these lifts to be removed? The concession applicant is purchasing the going concern so foot this cost. By removing lifts, there will be much less flexibility and therefore much less potential income for the operator (consider the number of occurrences where the Giant has saved the operation when the High Noon has not operated).

Transparency though the whole process has been appalling.

Pure Turoa has not provided Financials to the public to how they will make the operation work. To be truly transparent they need to show these figures rather than hiding behind a non-disclosure agreement and stating it is commercially sensitivity information. They have not shown how their Governance will work, who will be persons behind it. Coincidentally, the Government has been extremely poor at showing transparency.

Adherence to the Tongariro National Park Management plan must be followed. It is a good document and offers a checklist to the complete consideration of the bigger picture and the concession process it. It must be followed.

Adherence to the Treaty of Waitangi. There has been little comment about this except for the fact there is a fairly large treaty settlement pending for the area. This must be considered in the complete picture.

Regarding the Concession process, in the past a typical concession timeframe has been a minimum of four years. The expectation that Pure Turoa can just whizz it through and be up and running by this winter season is incredibly incorrect. Due process must be carried out. If it has taken four years previously for a concession process of due diligence, then why would it take less than it has taken in the past – what short cuts are being taken to achieve a shorter time frame? What considerations are not being taken which were valid prior? What due diligence is not being considered?

The government is playing silly games, by paying huge prop up loans to continue the receivership and yet forgive loans to the new potential operator and yet not include Iwi led applicants. There is an extreme lack of transparency in what the Government is doing – and to some extent I'm not sure even they know what they are doing. The Government need solve this for the best interest of everyone and yet first and foremost the Tangata Whenua. The Administration process was incredibly poor, non-transparent, and blind to the needs of the Iwi, the requirements laid out in the Tongariro National Park Management Plan, the Creditors, and the shareholders. The administration was poorly run and to some extent unlawful in its handing of procedures. As a result, three ministers of Parliament have had to formally apologise to Iwi.

Summary:

The only outcome is for the Tangata Whenua as custodians, backed by the New Zealand Government (in partnership).

The New Zealand Government passes RAL to the Iwi collective, loans are forgiven, the Ski fields can operate as they have in the past with the present concessions. And with Iwi led interventions, a better management of the operation can occur with better executive governance (which is the core of the original issue here and the cause) the Ski field foot print of its commercial operations is improved, the spiritually of the mountain is regained and the original intention of the gift of the Tongariro National Park and its mana is retained – for the people.

I see Iwi led collation taking over the present RAL operation as the perfect panacea that could create a unique operation with significant spiritual opportunities for Māori in New Zealand on a world stage. Imagine 'Tino Rangatiratanga' on a world stage. What an opportunity.

This is 'the' most fantastic opportunity for the Government to 'do the right thing' and show case how to 'get it right' in one easy solution.

In summary, Pure Turoa's application does not get even close, and I do not support it.

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.

Honour the Treaty of Waitangi.

Honour the Tongariro National Park Management Plan and the agreements made by the government with the people of New Zealand; Development Issues for He Kaupapa Rangatira

The following issues are indicative (but not exhaustive) of the matters which need to be resolved to the satisfaction of iwi and the department in order to achieve cooperative conservation management:

- consultation between the parties;
- participation in conservation management projects;
- sharing of resource information;
- recognition of the parties' perspectives and sharing of resources;
- development of resource management approaches to achieve the protection of taonga;
- involvement in the process of considering concession applications;
- iwi involvement in concession opportunities;
- cultural resource allocation;
- management of wāhi tapu;
- participation by iwi in the preparation of management plans, strategies, and policy;
- development of projects which give effect to the principles of tino rangatiratanga and kaitiakitanga;
- involvement in visitor services to achieve ongoing protection of taonga;
- identification of restoration projects for iwi participation;
- use of tikanga Māori in the department's work;
- staff development in cultural learning; and
- departmental involvement in relevant Treaty claims.

Honour the concession process – do it correctly – do the due diligence - do not rush it.

When these principles have been achieved (and this may take some time), then and only then will there be an applicant that can be approved with the support of all New Zealanders.

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 360

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	Nathan Warnock
Organisation	
Date	9/02/2024

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:

Cultural
Tourism
Future generations

My reasons for my objection or submission are:

Local organizations work closely with Pure Turoa and Ngati Rangī and we are satisfied that the two groups have worked productively prior their submitting their plans and ideas.

Sec 9(2)(a) [redacted] who understands the specific challenges and opportunities to our region I strongly support Pure Turoa Ltds concession application .

For future generations to enjoy, discover the environment and cultural aspects of our region is important for our younger generations all year round.

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 have no requests or amendments

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?

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 361**

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	Thomas Robert Cummings
Organisation	Myself and Whanau
Date	9 February 2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

Concession for Pure Turoa to Operate Turoa Ski Area

My reasons for my objection or submission are:

I am aged 72. I have skied at Turoa since it was first operated by Alex Harvey Industries. I am passionate about my skiing and love the environment of the area. While being saddened at the demise of RAL I see that Pure Turoa as being the only viable alternative for skiing at the Turoa side of Mt Ruapehu. In addition, being focussed on the Ohakune side of the mountain and being primary local, Pure Turoa understands the need for a symbiotic relationship with the townships of Ohakune and Raetahi and the wider area.

Pure Turoa will breathe life back into the local communities that have been in limbo on this matter. For too long, under I have felt the Turoa has been the poor cousin in the skiing relationship with RAL

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 main outcome for me would be granting the concession to Pure Turoa so that there is certainty moving forward. Frankly I was hoping for more than a 10 year concession but given my age that will ok 😊. I am comfortable that Pure Turoa are well aware of the cultural and conservation significance and importance of Ruapehu and its surroundings. I would hope that they can foster summer activities on the Maunga and therefore make for a more sustainable and enjoyable future that can be shared by all who visit the area. There is huge scope here for employment with sustainable tourism here. Skiing is one of the main things that keep me 72 years young. I would find the loss of skiing at Turoa hard to swallow. Pure Turoa and their concession is the only realistic option on the table.

Thank you for your consideration

Tom

G. Attachments

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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 362

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

Peter Cheesmur

Organisation

Turoa Patrol, Coronet Peak
b.k.e patrol

Date

8/2/2024

D. Statement of Support, Neutrality or Opposition

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

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

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

E. Hearing Request

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

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

F. Objection or submission

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

I believe pure karoa operating the ski area is essential to the community and empowers the mountain

My reasons for my objection or submission are:

respect from the people for the mountain comes from having people on the mountain so if there is no ski area, there are no people to pay respect

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 has my full approval

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 363**

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 Bowen
Organisation	N/A
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:

De-commissioning of lifts.

My reasons for my objection or submission are:

Nga Wai Heke – Removal of this lift removes return access from one of the longest in field runs in the country (Triangle) that retains snow all season. Also access further out to the glacier. This is a significant area of the field that can't be accessed. Is there an environmental concern? What is wrong with it? No information on that. 2023 it was reported it may be repaired through the season now its take it out.

The Giant - Removal of this lift which is used by so many intermediate and advanced skiers will only increase pressure on the High Noon with more intermediates mixing it with them on advanced terrain.

It will also shrink the length of the season as the High Noon takes a lot of snow to open. Not enough snow low down and not enough high up due terrain. No Giant , no Nga Wai Heke. Late season people use The Giant as a return from out West especially when snow cover is marginal or not even there, not allowing access back to Base lifts. Also all that Giant/Nga Wai Heke traffic will add to the current rerun to base traffic (when there is snow). It's a safety problem now and you want to push more people down Clarry's track?

An eventual two lift system confines everyone to the inner field and early season into a few groomed lanes unless full snow cover and tightens the skiable season. A lot of advanced skiers enjoy heading out East or West – takes them off the main runs for half an hour at a time. And is a national treasure not to be enjoyed?

Redundancy – Lose the High Noon – effectively that's the season over with rising snow levels.

Consider the days the High Noon has been not open due visibility or avalanche clearing unable to be completed because it wasn't clear for the helicopter pre-opening time, However, the Giant and Nga Wai Heke were able to operate.

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.

Retain the Giant and Nag Wai Heke lifts in some form. The Naa Wai Heke could be a T bar – The Giant really needs to be chair. It's been upgraded recently for \$5M or so, it should be good for some years yet.

I would approve if the lifts were retained.

G. Attachments

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A. Permission Application Number and Name of Applicant

SUB 364

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 Martin

Organisation

Date

9/2/24

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

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

My reasons for my objection or submission are:

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

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

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

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

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

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

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

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

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

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

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

6. Past concessions negotiations took around four years.

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

7. Key information has not been provided.

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

Iwi engagement has been completely redacted.

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

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

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

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

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

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

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 365**

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	Saul Gudsell
Organisation	n/a
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

Support the application as a whole

My reasons for my objection or submission are:

I support the continued use of ski operations at Tūroa. I welcome the idea of less structures and better efficiency on the Maunga contributing to a better experience for skiers, while balancing the visual impact of structures on the environment.

Although I am a keen trumper and back country user and highly value our natural and wild environments, I am also aware that Tūroa (alongside whakapapa) provides the only skiing (outside of a couple of small club fields) for the whole of the North Island and generates significant income for the Central North Island area. I feel the pathway PTL has laid out within the application is a great way to move forward in this space.

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?

A. Permission Application Number and Name of Applicant **SUB 366**

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

Melissa Bahler

Organisation

Date

9.2.2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

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

My reasons for my objection or submission are:

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

Leaving RAL in place well supported with government oversight and backing would allow the current concession of 60 years to remain in place. Alternatively, we wish the concession to be extended beyond 10 years.

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

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

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

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

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

The removal of the Giant Chair before any new chair is imminent is short sighted and will cause huge lines for the few lifts that are available. I think you underestimate the skiers who use the Giant as an intermediate skiing option, thus they will go to other ski fields that suit their abilities. The changes without an actual timeline of when new lifts will be introduced shows a lack of business planning – this will result in a mountain with little facilities and if money proves tight (which it will if you raise the prices and get less people on the field) then the new lift may never eventuate.

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

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

This would also be detrimental for the town of Ohakune that rely on the tourism the mountain brings.

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

5. Past concessions negotiations took around four years.

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

6. Key information has not been provided.

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

Iwi engagement has been completely redacted.

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

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

Keeping the existing RAL concession in place provides a safe working relationship.

Many livelihoods rely on this mountain being fully operational, families who live in the area may not even be able to afford to ski on the mountain if the current plan by Pure Turoa to increase prices goes ahead.

I believe that Ruapehu Alpine Lifts successfully ran the mountain last season and with proper support from Government could continue to run Turoa as a not for profit.

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

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

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

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

G. Attachments

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 367

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	Ei Leen Voon
Organisation	–
Date	09.02.2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

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 368**

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

Kim Hill

Organisation

N/A

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:

De-commissioning of lifts.

My reasons for my objection or submission are:

Nga Wai Heke – Removal of this lift removes return access from one of the longest in field runs in the country (Triangle) that retains snow all season. Also access further out to the glacier. This is a significant area of the field that can't be accessed. Is there an environmental concern? What is wrong with it? No information on that. 2023 it was reported it may be repaired through the season now its take it out.

The Giant - Removal of this lift which is used by so many intermediate and advanced skiers will only increase pressure on the High Noon with more intermediates mixing it with them on advanced terrain.

It will also shrink the length of the season as the High Noon takes a lot of snow to open. Not enough snow low down and not enough high up due terrain. No Giant , no Nga Wai Heke. Late season people use The Giant as a return from out West especially when snow cover is marginal or not even there, not allowing access back to Base lifts. Also all that Giant/Nga Wai Heke traffic will add to the current rerun to base traffic (when there is snow). It's a safety problem now and you want to push more people down Clarry's track?

An eventual two lift system confines everyone to the inner field and early season into a few groomed lanes unless full snow cover and tightens the skiable season. A lot of advanced skiers enjoy heading out East or West – takes them off the main runs for half an hour at a time. And is a national treasure not to be enjoyed?

Redundancy – Lose the High Noon – effectively that's the season over with rising snow levels.

Consider the days the High Noon has been not open due visibility or avalanche clearing unable to be completed because it wasn't clear for the helicopter pre-opening time, However, the Giant and Nga Wai Heke were able to operate.

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.

Retain the Giant and Nag Wai Heke lifts in some form. The Naa Wai Heke could be a T bar – The Giant really needs to be chair. It's been upgraded recently for \$5M or so, it should be good for some years yet.

I would approve if the lifts were retained.

G. Attachments

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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 369**

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	Julie Bezett
Organisation	Bezett family Cameron Bezett, Julie Bezett, Wayne Bezett, Elijah Bezett, Zoe Bezett
Date	7/02/24

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:

Lease and Licence to Operate Turoa Ski Area
Aircraft and Filming activities

My reasons for my objection or submission are:

We are writing to support the application by Pure Turoa to operate Turoa Ski Area. It has been run by a private company in the past and we have no problem with a private company running Turoa in the future. Access to the National Park, will continue, under Pure Turoa.

As locals, we see Pure Turoa as the most viable of any alternative put forward to run Turoa Ski Field. They have the support of the RAL staff who presently work at Turoa. They have the support of many, or possibly most of the businesses in Ohakune and they have the support of many locals. And they are ready to go.

Our community deserves to have some security for the future. The closure of Turoa would be the death knoll for so many of us living here. Our towns would suffer, our schools will suffer, and business will suffer. The value of our homes will plummet, making it almost impossible for families to sell and move on.

We live here, because of the ski fields, the Maunga and our love of the outdoors. We were here when it was Privately owned previously. We have businesses here, and want our area to thrive. We can see that any more protracted negotiations regarding the skifields, could possibly result in no ski fields at all.

Pure Turoa is driven by passionate people who want Ohakune and it's environs to thrive. Their mission is to ensure a culturally aligned, environmentally sustainable and commercially viable Turoa. They speak of iwi values, being a cornerstone of all operations on the Maunga.

Pure Turoa is offering all local children at our local schools, free Season Passes. An amazing offer to our communities.

It has been acceptable to grant a concession in the past to RAL, and we believe Pure Turoa deserve the same consideration.

Sec 9(2)(a)

We believe what Pure Turoa are offering, to be the best outcome for all our communities.

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.

Turoa will operate for the next 10 plus, years

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 370**

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	Ben McMaster
Organisation	
Date	08 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:

A viable ski field operator for Tūroa going forward.

My reasons for my objection or submission are:

To ensure the continuation of snow sports on Tūroa for years to come.

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 371**

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	Bridget Dougherty
Organisation	
Date	8/2/24

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 submission are:

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

- Turoa is what has brought us to Tongariro National Park and the mountains and by extension to Ohakune. As a family we have been visiting and enjoying the area for 25 plus years ^{Sec 9(2)(a)} [REDACTED] Skiing off the high noon and looking up at the summit and around at expansive open terrain is a special and spiritual experience that you don't get at any other field in New Zealand.
- 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 snow sports 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.

G. Attachments

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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.

OBJECTION OR SUBMISSION



Department of Conservation
Te Papa Atawhai

New Zealand Government

A. Permission Application Number and Name of Applicant **SUB 372**

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 Barry Menzies

Organisation

Date 9-2-2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

- Proposed reduction in lifts.
- Short term of the concession applied for.
- Splitting up of the two ski areas.

My reasons for my objection or submission are:

The Proposed reduction in lifts for Turoa seems a very negative long term move for the Ski Area and also the local economy as a reduction in terrain most possibly will lead to patrons going elsewhere to ski (the South Island).

To apply for a short term concession (10 years) does seem a bit hard to be basing a business model on for such an important local tourist attraction.

I think the splitting of the ski areas which already have long term concessions is a bad idea as on the marginal days on one field the resources can be transferred to the busier field as required which should not only enhance the visitor experience but should make for a more sustainable business model if managed correctly.

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.

Reject any sale of RAL ski area assets and the crown to retain the existing ski area concessions and have RAL run the ski areas without the high debt corporate attitude and return to low debt conservative management that worked for so long.

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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Attachments

If you are using attachments to support your objection or submission, please attach each attachment to the form below and send your attachments with the objection or submission form.



A. Permission Application Number and Name of Applicant **SUB 373**

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	Richard Hanson
Organisation	
Date	9 Feb 2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

1. That the term of the Concession be approved for a term of 30 years or what originally applied for Ruapehu Alpine Lifts.
2. That the fee payable for the Concession be no different from that paid by Ruapehu Alpine Lifts
3. That no further costs or obligations are placed on Pure Turoa above what was provided by Ruapehu Alpine Lifts

My reasons for my objection or submission are:

I wish to recommend that the proposed concession for Pure Turoa provide the commercial incentive for people to invest in the business. A successfully run Ski Area at Turoa will substantially reduce the long term risk for the Crown.

The key aspects that influence the ability of a ski area to raise money and successfully operate are:

- Term of Concession / Lease
- Rate of Fee Paid
- Rehabilitation Obligations & Guarantees

I recommend that the proposed concession to Pure Turoa be no more onerous than the original Concession operated by Ruapehu Alpine Lifts. Any increased cost, obligation or decreased term is a substantial disincentive for the successful operation of the business.

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 374

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	Joanne Nikora
Organisation	-
Date	8/2/2024

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:

This submission relates to the harm to Ohakune businesses by no decision being made. Pure Turoa are locals who know the mountain & they are businessmen.

My reasons for my objection or submission are:

I wish to see Pure Turoa successful in their bid so skiers do not, like last year go elsewhere. The uncertainty is ~~an~~ crippling for this small town.

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

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

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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How do I submit my objection or submission?

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A. Permission Application Number and Name of Applicant **SUB 375**

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	Megan Younger
Organisation	
Date	9/02/2024

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 entire document/s

My reasons for my objection or submission are:

I am submitting in support of this concession. I feel that it is a move in the best interest of the community. As a permanent member of this community, I feel there has been a greater due diligence and focus on the wellbeing of those that have established livelihoods here in the community of Ohakune.

I see the reduction of infrastructure in the best interest of mana whenua's wishes to not have infrastructure in or on their tupuna maunga and have had to live with that grievance for the lifetime of the road and ski 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.

Less so to be addressed, as I feel that a significant portion of this has been covered in the application, but it is worth noting;

The waters that run from Ruapehu is some of the most pristine water in the country. The ski area(s) compromise this life source that is not only for human consumption, but for the incredibly unique species that we have in this region. This is inclusive of the alpine flush wetland systems and their delicate nature, and those systems we cannot see, like aquifers. The biggest indirect source of pollution to these spaces are from those travelling up to the area recreationally and as a byproduct of maintaining this area, so any efforts to protect these are important.

We should also be reminded that the faces of Ruapehu are wilderness areas. While the health and safety of visitors to the region is important, we are at the mercy of that climate and volcanic system I feel that any excessive human intervention or development to mitigate that risk should not be undertaken.

Also, as the iwi entities of Ngāti Rangi and Uenuku continue to build capacity, engagement and understanding of their tools they use to manage the taiao should be employed. Data should be continually provided or available on request early to these groups to allow for early decision making; for example around water leaving the site (contributing to Te Waiū o te Ika).

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 376**

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	Melody Krebs
Organisation	
Date	9/02/2024

D. Statement of Support, Neutrality or Opposition

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How do I submit my objection or submission?

UPDATED

Buyer for insolvent Ruapehu Alpine Lifts' main skifield walks away

By [Kate MacNamara](#)

8 Feb, 2024 05:00 AM ⌚ 7 mins to read

The Crown's preferred bidder for the [insolvent Whakapapa skifield](#) has walked away from negotiations, throwing the future of skiing in the North Island, and tourism in the central region, into further doubt.

"It's a dead bid... there's inadequate [Crown] funding," Tom Elworthy told the *Herald*.

He said a combination of factors now make a commercial business case for the operation impossible: the untenably short licence to operate the ski field on offer by the Department of Conservation (DoC) - the skifield is in the Tongariro National Park - and a "fiscal cut" to the Crown's commitment to the bid, a change since the election of the new Government in October.

Any new operator of the skifields is required to seek a fresh operating concession from DoC; the department offered Elworthy's group a 10-year concession, however its terms are subject to review in five years. The timeframe is a drastic reduction from the status quo.

"We're on the sidelines, definitely... no sane person is going to take on a business with a looming \$15m debt [repayment], deferred maintenance and the other risks, and a very short concession," Elworthy said.

Last year, Elworthy and partners from the Christchurch-based private equity firm The South Island Office were the government's [preferred bidder](#), through Whakapapa Holdings Ltd, for assets of the Whakapapa skifield on Mt Ruapehu, the largest of the two fields operated by Ruapehu Alpine Lifts (RAL), now in receivership.

The skifield now appears to face a funding crunch next month. Without further taxpayer money to help it prepare for the ski season and to hire staff, it's not clear that Whakapapa can operate this winter.

For the last 16 months insolvent, not-for-profit operator RAL [has been kept afloat with \\$20m of taxpayer money](#), none of which is expected to be repaid. The last round of funding

was approved by the Labour Government in early October. At the time, \$4.3m was earmarked to keep RAL operations afloat until March 2024 (and \$3m was earmarked for Crown commitments to a separate bid for the Tūroa skifield).

The previous Government claimed that the importance of the skifields to the economy of the central North Island, and particularly to the local tourism sector, justified the hefty expense. The new National-led coalition Government may be altering course.

The Ministry of Business, Innovation and Employment (MBIE), the government agency driving the process to sell RAL's assets, said in a statement: "Commercial arrangements for the Whakapapa skifields are under active consideration. MBIE cannot comment any further on this process."

Finance Minister Nicola Willis' office directed questions on the matter to Minister for Regional Development Shane Jones. Jones provided no comment on the matter, beyond that offered by MBIE.

The Crown is RAL's biggest creditor and largely controls its fate. However, three iwi have interests in the Tongariro National Park and among these, Ngāti Tūwharetoa, in particular, opposes the commercial sale of the skifields.

Iwi interests in the two ski areas differ. Ngāti Tūwharetoa's interests are centred on the Whakapapa field on northern side of Mt Ruapehu, while Ngāti Rangī and Uenuku interests centre on areas including the Tūroa skifield on the mountain's southwest slopes.

DoC is required to meaningfully consult iwi on the matter of the skifields' concessions.

Treaty settlement in Tongariro National Park

Ngāti Tūwharetoa is connected to the Whakapapa skifield through its traditional rohe (territory), and additionally through bond holdings totalling \$9.5m which give it security over the field's gondola - the \$25m gondola was built in 2018 and it was also funded with an ill-fated \$10m loan from the Crown's Provincial Growth Fund.

A bid on behalf of Ngāti Tūwharetoa for all or part of RAL was expected in 2023, but in October the iwi advised ministers of a change of heart: it now opposes the commercial tender process.

A November briefing by officials to the new Minister of Conservation, Tama Potaka, noted: "Ngāti Tūwharetoa wrote to ministers and officials [in 2023] to advise that they would not bid for RAL's assets, do not support a private commercial tender for the purchase of RAL and would prefer to work with the Crown to develop an acceptable transition plan that would operate until the successful conclusion of the Tongariro National Park settlement negotiations."

The iwi's treaty 2018 settlement requires the Crown to negotiate terms of "cultural redress" over the Tongariro National Park. This process is also expected to include other iwi and

hapū with interests in the park. Negotiations started last year after a long delay and are likely to take at least several years.

“Given some of the positions expressed by iwi regarding a commercial operation on Mt Ruapehu, there is a risk of a prolonged concession process, legal challenges and additional costs to the Crown to keep running the skifields prior to the completion of any transaction,” officials warned.

In 2023, the previous Government acknowledged considerable deficiencies in officials’ consultation and engagement with iwi on the matter of the RAL insolvency.

Pure Tūroa bid moving ahead

Separately, the sale of RAL’s Tūroa skifield to Pure Tūroa Ltd is slowly moving ahead - the company is jointly owned by businessmen Greg Hickman of Ōhakune and Cameron Robertson of Taupō. The purchase price is \$1; the terms commit both the buyer and the Crown to further investment in the company.

After considerable delay, Pure Tūroa signed a conditional agreement to buy the skifield at the beginning of the month, but completion is contingent on the issuance of a new operating licence by DoC.

Public hearings on Pure Tūroa’s licence application are expected later this month. If executed, the deal requires a Crown investment of at least \$3m in the company, and it would take a 25 per cent equity stake.

Pure Tūroa is seeking a licence to operate the Tūroa ski field for a 10-year term, with a review after three years. It would also have rights to a 20-year extension, with further reviews every five years.

Sticking points for Whakapapa Holdings

Elworthy said his company would need a much longer licence term to make a viable, commercial investment in the Whakapapa skifield.

A 10-year licence, reviewable at five years, would be a remarkable departure: RAL’s current licence to operate the Whakapapa skifield runs for 30 years (2017 to 2046). It also contains considerable rights of extension from 2046.

Elworthy also noted the requirement to assume more than \$14m in secured “gondola bonds”, which come due in 2026. Elworthy said the debt is structured as “equipment bonds” and the bondholders have security over the physical gondola.

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Crown costs sunk into the failing RAL operations, or anticipated against it, now top \$100m. The lion's share is made up of a \$47m to \$88m contingent liability for the clean-up of infrastructure on the mountain in the event of the ski fields' closure. The liability, which previously sat with RAL, appears to have been assumed by DoC.

In addition, the Provincial Growth Fund, also under the direction of Shane Jones as the former Regional Development Minister in the Labour-led coalition Government of 2017, lent \$15m to RAL in 2018 and in 2020. This is expected to be written off entirely.

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A. Permission Application Number and Name of Applicant **SUB 377**

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.

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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	David Krebs
Organisation	
Date	9/02/2024

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Printed name of submitter or person authorised on behalf of submitter	Heather Krebs
Organisation	
Date	9/02/2024

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Complete environmental impact reporting.

Complete cultural impact reporting

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How do I submit my objection or submission?

UPDATED

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By [Kate MacNamara](#)

8 Feb, 2024 05:00 AM ⌚ 7 mins to read

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He said a combination of factors now make a commercial business case for the operation impossible: the untenably short licence to operate the ski field on offer by the Department of Conservation (DoC) - the skifield is in the Tongariro National Park - and a "fiscal cut" to the Crown's commitment to the bid, a change since the election of the new Government in October.

Any new operator of the skifields is required to seek a fresh operating concession from DoC; the department offered Elworthy's group a 10-year concession, however its terms are subject to review in five years. The timeframe is a drastic reduction from the status quo.

"We're on the sidelines, definitely... no sane person is going to take on a business with a looming \$15m debt [repayment], deferred maintenance and the other risks, and a very short concession," Elworthy said.

Last year, Elworthy and partners from the Christchurch-based private equity firm The South Island Office were the government's [preferred bidder](#), through Whakapapa Holdings Ltd, for assets of the Whakapapa skifield on Mt Ruapehu, the largest of the two fields operated by Ruapehu Alpine Lifts (RAL), now in receivership.

The skifield now appears to face a funding crunch next month. Without further taxpayer money to help it prepare for the ski season and to hire staff, it's not clear that Whakapapa can operate this winter.

For the last 16 months insolvent, not-for-profit operator RAL [has been kept afloat with \\$20m of taxpayer money](#), none of which is expected to be repaid. The last round of funding

was approved by the Labour Government in early October. At the time, \$4.3m was earmarked to keep RAL operations afloat until March 2024 (and \$3m was earmarked for Crown commitments to a separate bid for the Tūroa skifield).

The previous Government claimed that the importance of the skifields to the economy of the central North Island, and particularly to the local tourism sector, justified the hefty expense. The new National-led coalition Government may be altering course.

The Ministry of Business, Innovation and Employment (MBIE), the government agency driving the process to sell RAL's assets, said in a statement: "Commercial arrangements for the Whakapapa skifields are under active consideration. MBIE cannot comment any further on this process."

Finance Minister Nicola Willis' office directed questions on the matter to Minister for Regional Development Shane Jones. Jones provided no comment on the matter, beyond that offered by MBIE.

The Crown is RAL's biggest creditor and largely controls its fate. However, three iwi have interests in the Tongariro National Park and among these, Ngāti Tūwharetoa, in particular, opposes the commercial sale of the skifields.

Iwi interests in the two ski areas differ. Ngāti Tūwharetoa's interests are centred on the Whakapapa field on northern side of Mt Ruapehu, while Ngāti Rangī and Uenuku interests centre on areas including the Tūroa skifield on the mountain's southwest slopes.

DoC is required to meaningfully consult iwi on the matter of the skifields' concessions.

Treaty settlement in Tongariro National Park

Ngāti Tūwharetoa is connected to the Whakapapa skifield through its traditional rohe (territory), and additionally through bond holdings totalling \$9.5m which give it security over the field's gondola - the \$25m gondola was built in 2018 and it was also funded with an ill-fated \$10m loan from the Crown's Provincial Growth Fund.

A bid on behalf of Ngāti Tūwharetoa for all or part of RAL was expected in 2023, but in October the iwi advised ministers of a change of heart: it now opposes the commercial tender process.

A November briefing by officials to the new Minister of Conservation, Tama Potaka, noted: "Ngāti Tūwharetoa wrote to ministers and officials [in 2023] to advise that they would not bid for RAL's assets, do not support a private commercial tender for the purchase of RAL and would prefer to work with the Crown to develop an acceptable transition plan that would operate until the successful conclusion of the Tongariro National Park settlement negotiations."

The iwi's treaty 2018 settlement requires the Crown to negotiate terms of "cultural redress" over the Tongariro National Park. This process is also expected to include other iwi and

hapū with interests in the park. Negotiations started last year after a long delay and are likely to take at least several years.

“Given some of the positions expressed by iwi regarding a commercial operation on Mt Ruapehu, there is a risk of a prolonged concession process, legal challenges and additional costs to the Crown to keep running the skifields prior to the completion of any transaction,” officials warned.

In 2023, the previous Government acknowledged considerable deficiencies in officials’ consultation and engagement with iwi on the matter of the RAL insolvency.

Pure Tūroa bid moving ahead

Separately, the sale of RAL’s Tūroa skifield to Pure Tūroa Ltd is slowly moving ahead - the company is jointly owned by businessmen Greg Hickman of Ōhakune and Cameron Robertson of Taupō. The purchase price is \$1; the terms commit both the buyer and the Crown to further investment in the company.

After considerable delay, Pure Tūroa signed a conditional agreement to buy the skifield at the beginning of the month, but completion is contingent on the issuance of a new operating licence by DoC.

Public hearings on Pure Tūroa’s licence application are expected later this month. If executed, the deal requires a Crown investment of at least \$3m in the company, and it would take a 25 per cent equity stake.

Pure Tūroa is seeking a licence to operate the Tūroa ski field for a 10-year term, with a review after three years. It would also have rights to a 20-year extension, with further reviews every five years.

Sticking points for Whakapapa Holdings

Elworthy said his company would need a much longer licence term to make a viable, commercial investment in the Whakapapa skifield.

A 10-year licence, reviewable at five years, would be a remarkable departure: RAL’s current licence to operate the Whakapapa skifield runs for 30 years (2017 to 2046). It also contains considerable rights of extension from 2046.

Elworthy also noted the requirement to assume more than \$14m in secured “gondola bonds”, which come due in 2026. Elworthy said the debt is structured as “equipment bonds” and the bondholders have security over the physical gondola.

He said earlier iterations of the deal between WHL and the Crown made some “provision” for these costs, “but that’s changed”.

Mounting Crown costs

Crown costs sunk into the failing RAL operations, or anticipated against it, now top \$100m. The lion's share is made up of a \$47m to \$88m contingent liability for the clean-up of infrastructure on the mountain in the event of the ski fields' closure. The liability, which previously sat with RAL, appears to have been assumed by DoC.

In addition, the Provincial Growth Fund, also under the direction of Shane Jones as the former Regional Development Minister in the Labour-led coalition Government of 2017, lent \$15m to RAL in 2018 and in 2020. This is expected to be written off entirely.

Further government funding of \$20m has floated skifield operations since October 2022.

Kate MacNamara is a South Island-based journalist with a focus on policy, public spending and investigations. She spent a decade at the Canadian Broadcasting Corporation before moving to New Zealand. She joined the *Herald* in 2020.

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A. Permission Application Number and Name of Applicant **SUB 379**

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	Ann Krebs
Organisation	
Date	9/02/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
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F. Objection or submission

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

1. The Tongariro National Park (TNP) treaty claim(s) have not been negotiated or settled. Doc cannot be complicit in yet another Treaty Breach.
2. Rushed Concession process.
3. Not enough information to know if Pure Tūroa Limited (PTL) will be financially sound even though PTL are being gifted the business for a \$1 with MBIE funding attached.
4. The decreased access to the mountain if the concession is awarded.
5. The duration of the concession is only 10 years.
6. The concession excludes wider alpine snow sports assets on Mt Ruapehu, specifically Whakapapa.
7. Compressed negotiation and consultation period.
8. Redaction of important information, including parties involved and consulted.
9. The concession holder must be responsible at their cost for removal of redundant structures from the Maunga. Absolutely not a cost for Doc who struggle to fund their normal activities.
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A. Permission Application Number and Name of Applicant SUB 380

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	Kelvin Ward
Organisation	
Date	9/2/24

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

Removal of lifts at Turoa. Specifically Giant, Nga Wai Heke, Parklane chairs and Wintergarden Platter lift.

My reasons for my objection or submission are:

1. **The removal of the Giant and Nga Wai Heke chairs will as noted reduce total uphill capacity (from 5500 to 4500/hr), which in itself will increase lift line congestion and reduce user satisfaction. However the effects on skiable terrain, congestion, and user satisfaction / amenity value of the ski field is related to more than just the absolute reduction in numerical uphill capacity.**
 - a. **Removing the Giant and Nga Wai Heke will reduce the skiable terrain (both westerly and easterly) that can be accessed from the top of the high noon without having to return to the base area. The base areas of the Giant and Nga Wai Heke both sit lower than the base station of the High Noon Express and allow the skier to access more terrain from the top of the high noon without returning to the base of the current Movenpick Chair. This reduction in skiable terrain will reduce skier experience and enjoyment and increase congestion at the base area lift.**
 - b. **The Wintergarden Platter provides an excellent “step up” for beginner skiers beyond the very basic Alpine Meadow learners area. Access to this Wintergarden is currently via the Parklane (without having to navigate the boneyard run from the top of the Movenpick). Removing these 2 lifts will significantly reduce beginner and “next step beginner” skiable terrain in the Wintergarden and also down Clary’s track. The proposed lowest access for these beginner skiers would be the top of the current Movenpick. This would require them to descend via the “boneyard” – which again with be increasingly congested and hazardous for beginners. Beginner Skiers will be significantly and negatively affected by the loss of these lifts.**

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 proposed removal of lifts will have multiple negative effects by limiting uphill capacity, increasing congestion and pinch points, reducing skiable terrain and reducing options / terrain for beginner skiers. The applicants should be required to provide updated plans to at least maintain current terrain access, beginner terrain and uphill capacity.

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?

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 381**

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	Belinda Meszaros
Organisation	
Date	9 Feb 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:

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 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?

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A. Permission Application Number and Name of Applicant **SUB 382**

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 Meszaros
Organisation	
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

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, biking 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. Without visitors surrounding businesses will suffer.
- 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 Rangi 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 Rangi 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

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A. Permission Application Number and Name of Applicant **SUB 383**

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	FLORA TAVISH
Organisation	N/A
Date	09/02/24

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

Lease + licence for PTL to operate Tūroa ski area

My reasons for my objection or submission are:

The ski field needs to operate to ensure the continued survival of the township of Ohakune and Ruapehu district. PTL represents the best chance of this happening.

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 must consult with and have right to local iwi.

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 384**

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 Kimpton
Organisation	N/a
Date	9/2/24

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

I **Do Not** 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 385**

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	Wade Kimpton
Organisation	N/a
Date	9/2/24

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

My reasons for my objection or submission are:

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

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 386**

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	Gareth Mackenzie
Organisation	
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

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

My reasons for my objection or submission are:

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

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

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

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

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

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

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

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

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

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

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

6. Past concessions negotiations took around four years.

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

7. Key information has not been provided.

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

Iwi engagement has been completely redacted.

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

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

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

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

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

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

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

G. Attachments

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 387**

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	Amilie Paynter
Organisation	
Date	9 Feb 2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

I support this submission based on the following reasons:

1. Iwi consultation and the planned consultations moving forward
2. The 10 year initial time frame which gives PTL an opportunity to prove that they are going to do what they promisee in regards to iwi conversations
3. The limiting of numbers to 4,500 to help preserve the mountain.

My reasons for my objection or submission are:

First and foremost Tūroa sits on the sacred mountain of Ruapehu. That means that the priority for me sits with iwi and their approval and there being structures of accountability in place that give them the power and influence to have a meaningful say in how things are run. What other parties such as the RSSA or even PTL want to do is of secondary concern to me, even though as a snowboarder I of course would love PTL to run the

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.

While I love the thought of reducing the footprint with the removal of some of the lifts that aren't use frequently, I am concerned about the environmental impact of the plans around Alpine Meadow and the carparks.

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 388**

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	Garth Shields
Organisation	Nil
Date	9/2/24

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

Pure Turoa is the only viable option to run turoa ski area. For too long there has been uncertainty on the future of the mountain, should this continue the surrounding area will continue to suffer the effects

My reasons for my objection or submission are:

I look forward to seeing pure turoa run a successful ski operation on the mountain. If they are declined the area will turn into a ghost town and we would be forced to move at great personal financial loss

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 pure turoas 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 @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 389

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	Samuel Buck
Organisation	
Date	8/2/24

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 submission are:

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

- Turoa is what has brought us to Tongariro National Park and the mountains and by extension to Ohakune. As a family we have been visiting and enjoying the area for 25 plus years^{Sec 9(2)(a)}. Skiing off the high noon and looking up at the summit and around at expansive open terrain is a special and spiritual experience that you don't get at any other field in New Zealand.
- 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 snow sports 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.

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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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 390**

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

Donna Deadman

Organisation

Date

9/02/2024

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:

Cultural
Tourism
Future generations

My reasons for my objection or submission are:

Local organisations work closely with Pure Turoa and Ngati Rangi and I am satisfied that the two groups have worked productively together with their future and submitting their ideas.

As an Ohakune local who was born and raised here, I understand the specific challenges and opportunities to our region, I strongly support Pure Turoa Ltd and their concession application.

For future generations to be able to enjoy and discover the environment and cultural aspects of our region, it is important that we keep Ohakune and the surrounding areas alive and well, and I believe Pure Turoa will have a huge part to play in doing this, they are an asset to our community,

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 have no requests or 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

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 391**

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 Rodgers
Organisation	N/A
Date	9/02/2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

1. The term of the concession being applied for as referenced in section 2.4. of application.
2. Redaction of information. Specifically information on p9 of application (2.4 – last paragraph), p14-p15 of application (3.2 – Company Structure and key personnel), Appendix 7-PTLs cashflow model, Appendix 10 – Record of Iwi Engagement.
3. Appendix 3 – Assessment of Landscape and Visual Effects
4. Appendix 4 – Ecological Assessment of the Tūroa Ski Area.
5. Omission of an Environmental Impact Assessment for the 'snow factory'.
6. Removal of lifts – Appendix 1 Licence and Lease Area Plans and Appendix 9 – Draft Indicative Development Plan
7. Introduction of car park barriers – Appendix 9 - Indicative Development Plan 6.4.3 Public Transport
8. Introduction of a car park space booking system – Appendix 9 – Indicative Development Plan 6.4.3 Public Transport.
9. Omission of a Cultural Impact Assessment.
10. Omission of consultation/independent research with the potential customer base of Tūroa ski area
11. The redacted cashflow model only covers 3 years.
12. Relationship agreement with Ngāti Rangī and Uenuku

My reasons for my objection or submission are:

"What's the hurry to get things wrong? You want to take your time to get it right." Ruapehu District Councillor Fiona Kahukura-Chase, Newsroom, 20 June 2023

I write this objection to this submission for myself and my family. We are snow sports enthusiasts. Skiing and snowboarding are the only sporting activities that we do as a family together. We are members of a ski club with club accommodation in Okakune and at Iwikau village. The time we spend together on Ruapehu is immensely precious to us. One of the things that attracts us to the ski areas on Ruapehu is that they are owned and operated by RAL, which is a limited purpose public benefit entity where all profits are reinvested back in the ski areas in accordance with the constitution. We also value the transparency around governance, finance and operations that this status provides.

The reasons for my objection are:

1. RAL currently holds a concession for Tūroa skifield which expires on 30 November 2042, with rights of extension making a total of 60 years. The applicant is applying for a 10 year concession, with a review in year 3, and rights to 20 year renewal. In my opinion, the length of the concession being requested is insufficient to:
 - show a long-term commitment by the applicant to operate the Tūroa skifield sustainably.
 - make commercial sense in light of the investment that would be necessary to carry out the applicants plans in the draft IDP.
 - provide peace of mind for all stakeholders that the Tūroa skifield will exist beyond the term of the concession."Ski area infrastructure is expensive to construct, but the high capital cost can be justified provided a long period of operation is available to realise the benefit of investment" (p9, Application for Licence and Lease). "Upgrades of the existing infrastructure will require investment in excess of \$32 million during the next 10 years." (8. Conclusion (no page number) Application for Licence and Lease). I would suggest that the initial 10 year term is not in any way sufficient to release the benefit of investment. In addition, there is no guarantee that any further terms will be forthcoming.
 - "Ruapehu Alpine Lifts Ltd holds all licences relating to Whakapapa and Tūroa ski areas. 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 quality of the skier experience. A unified approach to ski area management enables the department and the concessionaire to work effectively together in the best interests of the park and the public." (p21 Application for Licence – Policy Assessment). This application is for a concession to operate Tūroa Ski Area in isolation. What impact will that have on the management of the concession?

2. The following information has been redacted:

PTL's cashflow model

Record of iwi engagement

Information about the replacement cost of Tūroa assets

Company structure and key personnel

Key information has been redacted from the submission. The provision of this information is necessary in order to assess the application and make an informed submission.

In particular, without seeing the applicant's cashflow model, we have no way of knowing if they have sufficient capital to run a sustainable business. And without knowing who key personnel are, particularly at governance level, we have no way of knowing if they have the necessary skills, experience and integrity for operating and governing the Tūroa Ski Area.

3. Appendix 3 – Assessment of Landscape and Visual Effects

The Assessment of Landscape and Visual Effect is dated 2011 and was written for RAL and RAL's IDP, not the applicant's draft IDP. According to the applicant, this is "due to time constraints". It appears that the applicant is trying to rush this concession application through without taking the time to provide all the information needed.

4. Appendix 4 – Ecological Assessment of the Tūroa Ski Area.

The Ecological Assessment of the Tūroa ski area is dated 2011 and was written for RAL and RAL's IDP, not the applicant's draft IDP. Again, the reason given was 'time constraints'. I don't consider it sufficient that the applicant made an assessment themselves that an update Ecological Assessment wasn't necessary (p27 Application for licence and Lease).

5. Omission of an Environmental Impact Assessment for the 'snow factory'.

On page 16 of the applicant's 'Application for Licence and Lease', there is mention of "investment in a state of the art 'snow factory'". There is no information though on the water consumption of the 'snow factory' or an Environmental Impact Assessment or similar of snowmaking in this way.

6. Removal of lifts – Appendix 1 Licence and Lease Area Plans and Appendix 9 – Draft Indicative Development Plan

Removal of lifts as detailed in the draft IDP will:

- reduce the terrain accessible by lift and thereby reduce enjoyment of the Tūroa Ski Area.
- make the Tūroa Ski Area less appealing as a ski area and therefore is likely to result in reduced income and/or higher lift ticket prices as more snowsports enthusiasts move to other ski areas with better offerings.
- will likely affect the economic sustainability of Tūroa Ski Area, with the knock on effect for the local community. decreased capacity resulting from lift removal will likely push the cost of lift passes up, resulting in reducing access for the public.
- lead to a reduction in the overall capacity of the lifts (although this information is not provided within the application)? Reducing slope capacity by approximately 1/5 (18%) judging by the mention of reducing peak skier numbers to 4500 from 5500. Surely this will be detrimental to the economic wellbeing of the surrounding area?

7. Introduction of car park barriers – Appendix 9 - Indicative Development Plan 6.4.3 Public Transport

"National Parks Act 1980 for public benefit, use and enjoyment. The Act also provides for the public to have freedom of entry and access to national parks, so that the public may receive the inspiration, enjoyment, recreation, and other benefits that may be derived from mountains and other natural features." (p28, Application for Licence and Lease). This is concerning as it seems that the introduction of car park barriers will limit the public's access to the Tūroa Ski Area, and/or limit the public's access to parts of the National Park accessed through the Tūroa Ski Area.

8. Introduction of a car park space booking system – Appendix 9 – Indicative Development Plan 6.4.3 Public Transport.

RAL ran a car park booking system which caused huge problems for people trying to access the Tūroa Ski Area and the area of the National Park around the Tūroa Ski Area. A car park booking system, which will presumably be an online system, discriminates against people with slow internet access and/or without access to the internet

and/or who are less familiar with using online booking systems. Access should be retained on a first come, first served basis with no booking system implemented.

9. Omission of a Cultural Impact Assessment.

I was surprised to see that there was no Cultural Impact Assessment provided as part of the applicant's concession application given the location of the Tūroa Ski Area and the importance of the maunga for Tāngata Whenua.

10. Omission of consultation/independent research with the potential customer base of Tūroa Ski Area around the draft IDP.

"PTL are committed to reinvest in higher quality, lower impact facilities to enhance the customer experience." (p15, Application for Licence and Lease). There is no reference to any consultation or research with the potential customer base of Tūroa Ski Area in relation to the applicant's draft IDP. I would suggest that this is critical in ensuring that the contents in the applicant's draft IDP are likely to attract the strong customer base necessary for the sustainability of the Tūroa Ski Area.

11. The short time period covered by the redacted cashflow model (which seems to coincide with the concession review at year 3) concerns me. It suggests a lack of forward planning and makes me concerned that the applicant may not be considering operating Tūroa Ski Area beyond year 3.

12. Relationship agreement with Ngāti Rangī and Uenuku

The applicant references, several times in their application, the desire to form a 'Relationship Agreement' with Ngāti Rangī and Uenuku ("Tāngata Whenua") (p6, p9, p10, p12, p15,p18, p24, p31 Application for Licence and Lease). This is an excellent idea. A confirmed 'Relationship Agreement' would strengthen the applicant's concession application. Unfortunately, there is no current 'Relationship Agreement'.

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. I would like to see PTL make a revised application for a longer concession term.
2. Redacted information needs to be provided to the public so a well-informed assessment of the submission can be made.
3. An updated Assessment of Landscape and Visual Effects needs to be provided that refers to the applicant's draft IDP.
4. And updated Ecological Assessment needs to be provided that refers to the applicant's draft IDP.
5. Provide an Environmental Impact Assessment of the 'snow factory', and/or further information about expected water consumption and other environmental factors relating to the 'snow factory'.
6. A revised draft Indicative Development Plan that does not include removal of lifts. I would also like it to include broad consultation with a wide range of stakeholders.
7. Revision of the application for a concession to remove the reference to installation of car park barriers.
8. Revision of the application for a concession to remove reference to a car park booking system and a commitment to not implementing the car park booking system.
9. Inclusion of a Cultural Impact Assessment.
10. Inclusion of the results of independent research and consultation with the potential customer base of Tūroa ski area, particularly with regards to the applicant's draft Indicative Development Plan.

11. Inclusion of an unredacted cashflow model that goes beyond a 3-year period.

12. Inclusion of a Relationship Agreement between the applicant and Tāngata Whanua.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 392**

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	Joshua Morgan
Organisation	
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

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

My reasons for my objection or submission are:

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

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

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

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

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

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

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

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

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

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

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

6. Past concessions negotiations took around four years.

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

7. Key information has not been provided.

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

Iwi engagement has been completely redacted.

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

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

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

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

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

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

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

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 393**

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 Bland
Organisation	
Date	09.12.24

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

My reasons for my objection or submission are:

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

G. Attachments

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A. Permission Application Number and Name of Applicant SUB 394

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter

Organisation

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:

I fully support the application as presented by Pure Turoa

My reasons for my objection or submission are:

My reasoning for support is that I believe this commercial venture is the most suitable option for the future of skiing at Turoa.

I believed at the time that allowing RAL to acquire Turoa establishing RAL in a North Island monopoly position was in fact a recipe for eventual failure. Tukino is not large enough to be an effective competitor and in reality the majority of skiers do not have the money or flexibility of time to travel to the Sth Island a number of occasions in the season.

As a not for profit monopoly the RAL lacked the necessary financial and business disciplines to succeed in the long term.

The two founding directors of Turoa Pure have very successful business records that have required them to work with other people. From what I read and witnessing their attitude to date they will be most valuable to the two lwi partners to provide opportunity for their own people.

The partnership of the two lwi will also ensure that Māori values regarding the Maunga, both spiritually and environmentally, are respected and preserved.

Pure Turoa under local ownership with the right people at the helm is the best outcome for the town and community of 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.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 395**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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

C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	Daniel King, Julie King
Organisation	
Date	9/2/2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

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 1995, and we enjoy skiing/snowboarding, tramping and being out in the alpine environment.
- 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 Rangi 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 Rangi 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

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Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	Nathan Warnock
Organisation	
Date	9/02/2024

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:

Cultural
Tourism
Future generations

My reasons for my objection or submission are:

Local organizations work closely with Pure Turoa and Ngati Rangī and we are satisfied that the two groups have worked productively prior their submitting their plans and ideas.

Sec 9(2)(a) [redacted] t who understands the specific challenges and opportunities to our region I strongly support Pure Turoa Ltds concession application .

For future generations to enjoy, discover the environment and cultural aspects of our region is important for our younger generations all year round.

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 have no requests or amendments

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 397**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	Sec 9(2)(a)
Organisation	
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:

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

Having a commercial ski field operating at Tūroa provides an access point for many people to, consistent with the National Parks Act, visit use and enjoy the area. It connects people to the region which is the only true alpine area in the North Island. For most, the ski fields provides the only way to interact with an environment of its type and the maunga.

I 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.

There are vocal groups (mainly the Ruapehu Skifields Stakeholders Association), active in the media and on social media, who appear to be trying to derail the Pure Tūroa bid as it does not align with their proposed solution. These groups received an initial upswell of support when the stated aim was only "Save Mt Ruapehu" but as time has gone on my opinion is they have become fixed to one solution and less representative of those whose broader aim is to see continued use of Tūroa as a ski field for the public. As set out in the Administrator's Report prior to the Watershed meeting, I would encourage the careful consideration of what is a realistic/viable way to save the ski fields of Ruapehu and the public's method of access for this 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.

That DOC grant the concessions sought by Pure Tūroa Limited in their entirety.

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 398

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	Taine Alsweiler
Organisation	
Date	09.12.24

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

My reasons for my objection or submission are:

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

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

G. Attachments

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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 399

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Bryony coutanche
Organisation	
Date	9/02/2024

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:

Cultural
Tourism
Future generations

My reasons for my objection or submission are:

Local organizations work closely with Pure Turoa and Ngati Rangī and we are satisfied that the two groups have worked productively prior their submitting their plans and ideas.

As a local Ohakune resident who understands the specific challenges and opportunities to our region I strongly support Pure Turoa Ltds concession application .

For future generations to enjoy, discover the environment and cultural aspects of our region is important for our younger generations all year round.

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 have no requests or amendments

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 400**

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	Martin Gould
Organisation	
Date	9/02/2024

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:

Cultural
Tourism
Future generations

My reasons for my objection or submission are:

Local organizations work closely with Pure Turoa and Ngati Rangī and we are satisfied that the two groups have worked productively prior their submitting their plans and ideas.

Sec 9(2)(a) [redacted] who understands the specific challenges and opportunities to our region I strongly support Pure Turoa Ltds concession application .

For future generations to enjoy, discover the environment and cultural aspects of our region is important for our younger generations all year round.

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 have no requests or amendments

G. Attachments

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