



COMMENT SUBMISSION FORM

Publicly notified application for leases, licences, permits, or easements.

This form is to be used to provide submissions concerning publicly notified applications for leases, licences, permits, or easements under section Sections 17SC and 49 of the Conservation Act 1987.

Notes to Submitter:

Please download and complete this form, scan and send to permissionshamilton@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Private Bag 3072, Hamilton, 3240.

Closing Date: The closing date and time for serving submissions to the Director-General on this matter is 5:00pm on 5 March 2025 (Wednesday).

Please note that submissions are public documents. Your name and submission will be included in documents that are available to the media and the public. You may request that your contact details be kept confidential, but your name, organisation and your submission itself will become a public document.

Privacy:

The Department will deal with any personal information you supply in your submission in accordance with the Privacy Act 1993. The Department will only use your contact details for the purposes of processing the notified permissions application that it relates to (or in exceptional circumstances for other reasons permitted under the Privacy Act 1993).

Where your submission is made publicly available, your contact details will be removed only if you have indicated this as your preference in the tick box on page two.

Under the Privacy Act 1993, you may request the right of access to, and correction of, personal information provided in this submission.

The Department is likely to post your submission on its website at www.doc.govt.nz. Once submitted, submitters' information is subject to the Official Information Act 1982 and may be released under that Act.

Do not send page one of this document with your submission. If you require additional space for providing your submission, please attach extra pages as needed and label according to the relevant section.

Note: Include pages two and three of this form with your response to DOC. Do not include page one.

A. Permission Application Number and Name of Applicant

Ngā Waihua o Paerangi Trust 118578-OTH

B. Name of Proposed Activity and Location(s)

For phase 2 of a multi-staged approach to the trail known as Te Ara Mangawhero. The Applicant has applied for a 20-year licence for the development and operation of the trail. In addition, they have applied for a Works Approval under the Tongariro National Parks Management Plan for construction works and a 20-year filming permit.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

Sec 9(2)(a) on behalf of Bike Taupō Inc

Address for Service (Postal Address):

PO Box 1850, Taupō

Post Code: 3351

Telephone: Sec 9(2)(a)

Email Address: Sec 9(2)(a)

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

☐

I wish to be contacted alternately by: _____

☐

I wish to keep my contact details confidential

D. Statement of Support/Opposition

I **Support** this Application.

E. Hearing Request

I **Do** wish to be heard in support of this submission at a hearing - only if a hearing is to be held.

F. Submission

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

All of the application

My submission is [include the reasons for your views]:

Bike Taupō supports the development of the proposed shared use trail by the Trust. The proposed trail will be beneficial to the land and the people. It will provide economic, environmental, social and cultural benefits.

Bike Taupō is familiar with the proposed trail and its route. The trail will be an important riding and walking experience within the central north island for locals and visitors alike. The route of the trail and its design respects the important environmental and cultural values of the site.

The development of the proposed trail will have a beneficial impact on the central north island as a riding destination. The trail will provide a unique rider experience that is not found anywhere else in New Zealand. It will be very popular and will result in positive benefits to the local communities as well as NZ which is fast becoming a world-renowned bike destination.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

That the concession and works approval for the trail as proposed be granted by the Department.

G. Your Signature

Sec 9(2)(a)

Signature of submitter or person authorised to sign on behalf of submitter

Sec 9(2)(a)

Printed name of submitter or person authorised to sign on behalf of submitter

04 February 2022

Date

Please complete this form and send to permissionshamilton@doc.govt.nz (*Marked for the attention of J. Methorst*). You may also post your submission to: Director-General, c/o Department of Conservation, Private Bay 3072, Hamilton, 3240 (*Marked for the attention of J. Methorst*).



Forest & Bird

TE REO O TE TAIAO | *Giving Nature a Voice*

5 March 2025

Submission on concession for Phase Two of Te Ara Mangawhero, Tongariro National Park

To: Department of Conservation
Submitted via email to permissionshamilton@doc.govt.nz
Attention: Joke Methorst, Permissions Advisor

From: Royal Forest and Bird Protection Society Inc (Forest & Bird)

Sec 9(2)(a)

Sec 9(2)(a)

or Sec 9(2)(a)

Introduction

1. Forest & Bird is New Zealand's largest independent conservation organisation. Our mission is to protect New Zealand's unique flora and fauna and its habitat. We are listed in Appendix 5 of the Tongariro National Park Management Plan as a Park Partner, assisting the Department in producing good environmental outcomes in Tongariro National Park.
2. Thank you for the opportunity to submit on this concession application for phase 2 of a multi-staged approach to the trail known as Te Ara Mangawhero. The Applicant has applied for a 20-year licence for the development and operation of the trail. In addition, they have applied for a works approval under the Tongariro National Parks Management Plan for construction works and a 20-year filming permit to promote the use of the trail.
3. Forest & Bird has had long standing concerns¹ regarding the construction of a cycle path in a currently untouched and fragile part of Tongariro National Park, a dual World Heritage Area. Based on the Application presented to the Department for Phase 2 of Te Ara Mangawhero, our position remains unchanged.
4. We would like to speak in support of our submission.

¹ See Appendix 2 of the Application.

PROJECT OVERVIEW

5. “This second phase of Te Ara Mangawhero Trail will involve construction of approximately 12 kilometres of trail, from Rimu Hill to Massey Hut, on the upper slopes of Maunga Ruapehu. The entire length of the proposed trail is within Tongariro National Park, which is recognised as a World Heritage Site for its international cultural, ecological, and landscape significance.
6. As a whole, the project area of Phase 2 Te Ara Mangawhero Trail, at Ruapehu is of “**exceptional** ecological value”.²

SUBMISSION

7. Forest & Bird considers that this concession application is inconsistent with the National Parks Act 1980, the General Policy for National Parks, the Tongariro National Park Management Plan (TNPMP) and the subsequent Addendum to the TNPMP Partial Review, as well as the Conservation Act 1987 and the Tongariro/Taupō Conservation Management Strategy.
8. All of the aforementioned Acts and statutory documents have clear direction that preservation and/or conservation is the primary objective in national parks and that public use or access is subject to that primary principle.
9. We have further concerns about the Assessment of Ecological Effects. We can see no analysis regarding its conclusions that effects of the proposed works will be less than minor. There is no evidence that the methodology followed the Department of Conservation guidance for Environmental Impact Assessments³ and the assessment lacks any rigour regarding the magnitude of effects in relation to the loss of 1.5ha (linear) of habitat in a dual World Heritage Area.
10. It remains Forest & Bird’s position that construction of a cycle path, particularly above the bush line, on Mt Ruapehu presents unacceptable effects on landscape, geology, ecosystems and habitat and is incompatible with the statutory direction for Tongariro National Park.

Statutory concerns

11. Forest & Bird disagrees with the interpretation of the hierarchy of considerations for decision makers as presented in Section 5.1 of the Statutory Assessment of the AEE.

² Page 33: Wildland Consultants (2024). Assessment of ecological effects for a proposed shared use trail on the slopes of Mount Ruapehu: Phase 2 - Rimu Hill to Massey Hut. Wildland Consultants Contract Report No. 5405i. Prepared for Ngā Waihua o Paerangi Trust. 92 pp.

³ <https://www.doc.govt.nz/documents/about-doc/concessions-and-permits/concessions/guide-to-environmental-impact-assessments.pdf>

12. S4 of the National Parks Act is clear in its direction that Parks are to be maintained in their natural state, and the public shall have freedom of entry and access. National parks have been set aside to preserve in perpetuity areas of New Zealand that contain scenery of such distinctive quality, and natural features so beautiful, unique or scientifically important that their preservation is in the national interest (section 4(1), National Parks Act). Section 4(2)(a) gives important context to the general purpose in subsection (1) stating that national parks shall be so administered and maintained under the provisions of the National Parks Act that—

(a) they shall be preserved as far as possible in their natural state:

13. According to Wildland’s Assessment of Ecological Effects: “Most of the proposed trail footprint (with the exception of Section 6 - Blyth Track) is within areas that have very little modification by people, and do not have existing official tracks. All vegetation and habitat types present are dominated by indigenous species, with very few exotic pest plants present. In general, the high-quality and intact, lowland to alpine ecological gradients that support a wide diversity of ecosystem types within the proposed Phase 2 trail footprint are of tremendous biological and conservation importance”.⁴

14. Given the **exceptional** nature of the habitat within the project area, construction of a cycle path must be subject to preserving and protecting the intrinsic worth and values of the place. Forest & Bird contends that no matter how sensitively done, avoidance of effects is impossible in such a sensitive environment. Cutting a path through currently unmodified habitats is incompatible with preserving those habitats in their natural state and construction of a cycle path is in direct contravention of s4 of the National Parks Act.

15. Further to this, the same principle can be found in s6 of the Conservation Act which sets out the Department’s functions. Section 6(e) 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” [Our emphasis]. Forest & Bird contends that conservation of these habitats will be compromised if a path is constructed through them, and that the proposed cycle path is not consistent with conservation as defined in the Act. Forest & Bird therefore maintains that this proposed concession activity would be in contravention of the Conservation Act.

16. Of note in Section 5.1 of the Statutory Assessment is the complete absence of analysis against the General Policy for National Parks. Although the 2017/18 partial

⁴ Page 33: Wildland Consultants (2024). Assessment of ecological effects for a proposed shared use trail on the slopes of Mount Ruapehu: Phase 2 - Rimu Hill to Massey Hut. Wildland Consultants Contract Report No. 5405i. Prepared for Ngā Waihua o Paerangi Trust. 92 pp.

review of the TNPMP can be deemed consistent with the General Policy, this does not remove the need to consider the General Policy in circumstances where the TNPMP merely directs consideration of the appropriateness of a specific type of concession (in this case the proposed cycle path).

17. The Wildlands Assessment of Ecological Effects goes into great detail regarding the ecological values within the project area, including the presence of rare, threatened and naturally uncommon flora, fauna and habitats. There is no evidence that Wildlands considered the ecological effects in relation to the General Policy, in particular Policy 4.1(b).
18. Considering the very high value indigenous species, habitats and ecosystems found within the project area, the construction of infrastructure (in this case a cycle path) for use and enjoyment should be limited to places (habitat) which are common and resilient to the effects of use and enjoyment or where adverse effects can be avoided.
19. It is Forest & Bird's contention that, when assessed against the suite of policies in 4.1 of the General Policy, a cycle path is inappropriate above the bush line and arguably inappropriate throughout the project area. The Application fails to present any evidence as to how Policy 4.1(b)(i-iv) can be achieved. Any development in the National Park should avoid places that are uncommon, distinctive, special and/or vulnerable as use in these areas is highly likely to affect a place's intrinsic worth and value. Based on the evidence presented in the AEE, this concession application does not give effect to, and is incompatible with, the policies in 4.1 of the General Policy for National Parks.
20. Similarly, there is clear direction in 4.5 of the General Policy regarding geological, landform and soil features. Section 6.8 of Wildlands Assessment of Ecological Effects identifies Section 9 of the proposed cycle path falls within habitat which "...is formed from stabilised mid-Holocene lahars (c.5,000 years ago) (Lecointre et al. 1998) and contains sparsely vegetated shrubland amongst patches of exposed bed rock, boulders, and gravel. Well-delineated terraces are present, including part of *one of very few mid-Holocene deposits that are preserved in the western Ruapehu plain and the only post-A.D. 1850 deposits* (Lecointre et al. 1998)"⁵ [Our emphasis]. Again, no evidence is presented in the AEE as to how the General Policy applies to a proposed activity on such unique geological landforms, particularly Policy 4.5(b). Forest & Bird reiterates that, based on the evidence presented, this Application fails to give effect to, and is incompatible with, the General Policy for National Parks.

⁵ Page 23: Wildland Consultants (2024). Assessment of ecological effects for a proposed shared use trail on the slopes of Mount Ruapehu: Phase 2 - Rimu Hill to Massey Hut. Wildland Consultants Contract Report No. 5405i. Prepared for Ngā Waihua o Paerangi Trust. 92 pp.

21. Forest & Bird disagrees with the assessment presented in Appendix 6 of the AEE assessing the proposed development against the relevant provisions in the Tongariro/Taupō Conservation Management Strategy. Principle 1 of the CMS gives highest priority to retaining and restoring natural biodiversity and protecting threatened indigenous natural resources within the conservancy.⁶ Of considerable relevance is the objective under mountain biking which states: “To provide mountain bike opportunities on public conservation land where neither natural and historic values nor the experience of other visitors are compromised.”⁷
22. The assessment in Appendix 6 suggests that the mountain biking objective has been met. It remains Forest & Bird’s contention that based on the evidence presented in the AEE, that this is not the case. The assessment suggests monitoring is to be undertaken by the Department and suggests no ongoing effects or physical impacts from the trail are anticipated. Given the highly erodible and fragile nature of the volcanic habitats through which this cycle path is to go, the presence of boardwalks above vegetation and beside rare and naturally uncommon wetlands, Forest & Bird challenges this position. We would like to see what monitoring data has been collected and question how the CMP anticipates ongoing erosion risk, above the bush line in particular, when it primarily addresses construction effects, not long-term use.
23. Forest & Bird has significant concerns regarding the construction of a cycle path through currently unmodified ecosystems and we question how this is compatible with the TNPMP. The key management philosophy of the TNPMP is to protect Tongariro National Park in its natural state in perpetuity.⁸ All activities are subject to being consistent with national park principles. Creation of a cycle path in such sensitive volcanic ecosystems creates risk of future disturbance of currently untracked areas of vegetation, especially sensitive alpine, subalpine, volcanic and wetland ecosystems. It is our view that this is inconsistent with the key philosophies within the TNPMP.
24. Objectives and policies in the TNPMP are intended to protect representative ecosystems, to prevent the establishment of new pest plant species in the Park etc. The clearance of vegetation required for track construction may have an immediate adverse effect, but Forest & Bird is concerned that these previously undisturbed, unmodified areas will become disturbed, tracked and opened for things like weed

⁶ Page 15: <https://www.doc.govt.nz/globalassets/documents/about-doc/role/policies-and-plans/cms/tongariro-taupo-cms-2002-2012.pdf>

⁷ Page 88: Ibid.

⁸ Page 39: <https://www.doc.govt.nz/globalassets/documents/about-doc/role/policies-and-plans/national-park-management-plans/tongariro-national-park/tongariro-national-park-management-plan.pdf>

invasion, littering and trampling by people getting off the track in contravention of the direction of the TNPMP.

25. Forest & Bird is also concerned about the assessment against the objectives and policies of TNPMP. For example, the objective under 4.3.2 (e) which states: “To encourage regional tourism stakeholders to develop activities and attractions at appropriate sites off public conservation lands”.⁹ However, this objective is not mentioned in the analysis.
26. Furthermore, the overarching premise of the concession application is that, because a partial review of the TNPMP was undertaken in 2017/18, then Phase 2 of Te Ara Mangawhero has a mandate to proceed.
27. For example, in the analysis against the TNPMP regarding whether the activity could instead be conducted outside the Park, the response is: “In this case the activity is the development of a trail which is specifically mandated by the Plan. The question of whether the trail should be in the Park was considered through the Plan amendment process which confirmed its appropriateness.”¹⁰
28. Forest & Bird disagrees with this assessment. The amendment to the TNPMP does not mandate the development of this cycle path within the Park, or confirm the appropriateness of the proposed route. The amendment simply states “*Consider ...the development of a shared-use cycling and walking track from the Turoa car park to Waitonga Falls...*” [our emphasis]
29. The Department of Conservation is under no obligation to grant this concession on the basis of the amendment to the TNPMP. As outlined in our submission above, this Application is at odds with the principles to be applied in National Parks (i.e. s4 of the National Parks Act), at odds with the Conservation Act and is incompatible with achieving the General Policy for National Parks or giving effect to the TNPMP. To quote the former Chair of the Conservation Authority:
- “The bottom line, of course, is that national parks are preserved and maintained in perpetuity. We must be ever vigilant to ensure that this basic tenet is not massaged or eroded.”¹¹*
30. We request this concession be declined.

⁹ Page 129: Ibid.

¹⁰ Appendix 5. Page 63: TAM Phase 2 AEE <https://www.doc.govt.nz/globalassets/documents/getting-involved/consultations/2025/nga-waihua-o-paerangi-trust/nga-waihua-o-paerangi-trust-assessment-environmental-effects.pdf>

¹¹ Foreword by Sec 9(2)(a) to the General Policy to National Parks, page 3: <https://www.doc.govt.nz/globalassets/documents/about-doc/role/policies-and-plans/general-policy-for-national-parks.pdf>



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A. Permission Application Number and Name of Applicant

Ngā Waihua o Paerangi Trust 118578-OTH

B. Name of Proposed Activity and Location(s)

For phase 2 of a multi-staged approach to the trail known as Te Ara Mangawhero. The Applicant has applied for a 20-year licence for the development and operation of the trail. In addition, they have applied for a Works Approval under the Tongariro National Parks Management Plan for construction works and a 20-year filming permit.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

Sec 9(2)(a) on behalf of Tongariro Tramping Club Inc.

Address for Service (Postal Address): Sec 9(2)(a), Post Code: Sec 9(2)(a)

Telephone: Sec 9(2)(a) Email Address: tongarirotc@gmail.com

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

☐ I wish to be contacted alternately by: _____

☐ I wish to keep my contact details confidential

D. Statement of Support/Opposition

I **Oppose** this Application.

E. Hearing Request

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

F. Submission

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

The section of the proposed track our club is most concerned with is the upper alpine section proposed to follow the true right bank of the Mangawhero Stream below the Massey University Alpine Club (MUAC) hut and on to the Waitonga Falls, Blyth Track junction. The upper Te Ara Mangawhero Phase 2 section is mainly alpine with bare rock, and streambed, tussock and alpine vegetation. This landscape is acutely sensitive to disruption and this section of track is likely to have the greatest adverse effects on natural, ecological and landscape character. TTC strongly opposes this high alpine section of phase 2 and proposes starting the Mountain to Sea route from lower altitude (such as the Waitonga Falls/Blyth track intersection). At the very least maintains that this section warrants significant further review of environmental and ecological impacts.

My submission is [include the reasons for your views]:

As a Tramping Club with a history back to 1935 and a significant body of local recollections spanning many years, we know the area well.

- The track to the old Blyth track hut which was last used almost 50 years ago still has deep erosion paths and damage to the natural vegetation today that has changed watercourses permanently
- The underlying substrate below the vegetation is fragile consisting of predominantly ash, mud and loose rocks. It is easy to damage and difficult to construct permanent surfaces on top of without significant machinery damage to the surrounding environment which will not recover quickly.
- A cycle trail will result in persistent, ongoing erosion creating deep scars, changing watercourses in the terrain as evidenced by the alpine portions of the old Blyth Hut track
- This terrain is a unique area within the national park. Sloping swampy terrain mixed with original bush patches on the southern side of Ruapehu is not replicated either in other parts of Tongariro National Park or the adjacent Kaimanawa ranges

In addition to our environmental concerns, we do not consider safety in a high alpine environment above 1600m has been adequately considered:

- The area is frequently subject to extreme weather with wind, snow, sleet and rain at any time of year
- Easy road access to a high alpine cycle trail where the mid-sections are inaccessible to emergency vehicles will pose safety risks
- In the proposed area wind, snow, sleet and rain can appear with little warning
- A bike crash in this terrain could have an adverse outcome for a rider unable to continue: Consider a lightly clad rider at 1600m, unable to continue after a fall under wind, sleet, snow conditions with no possibility of a vehicle or helicopter rescue.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

3. What outcomes would you like to address with our submission? [giving precise details, including the parts of the application we wish to have amended and the general nature of any conditions sought]

We suggest the upper alpine section of the Phase 2 track above the Waitonga Falls track should not proceed, mitigating the likely damage and safety risks outlined above. Our rationale is:

- The forest environment at lower altitudes is more resilient to disruption and recovery post-development of the cycle trail
- The chance of changing of watercourses would be less significant within the forest
- Erosion is easier to manage within the forest environment with boarded track boundaries as on the Waitonga Falls walking track
- Weather conditions are less extreme at the lower altitude within the forest
- The Waitonga/Blyth point is still on the mountain, so this still constitutes a “Mountains to Sea” route. After all, Massey Hut is not the top of the mountain – it is merely an arbitrary point selected as the start of the mountain section. Why not start it lower down? Riders can still cycle from the Massey Hut/Turoa skifield carpark to the Waitonga Falls track using the existing Turoa Mountain Rd if the weather and their skills permit but without the costs to environment and safety.

In the eloquent words of one member of Tongariro Tramping Club Sec 9(2)(a) :

I wish to make a submission regarding the proposed Te Ara Mangawhero phase 2. I think that starting the trail at the upper Blyth car park would be a much better idea than beginning at the Massey University Alpine Club Hut.

I must confess to having a strong emotional attachment to the area above this having experienced its great beauty and magic on foot for much of my life. We have a lot of bike ways in the North Island of this country but high, wild alpine environments are rare. This one is precious and fragile. Any changes cause erosion, changes to water courses and damage to wildflowers than never really recover. Sometimes mountains just need to be respected and left as they are.

Safety that high up is also an issue. Mountain bikers don't usually carry full storm gear and they crash quite often. It's an unforgiving place to get stranded in when the weather turns bleak.

Please consider starting the trail just a little lower for the protection both of a wild and beautiful ecosystem and for the safety of the people using it.

G. Your Signature

Sec 9(2)(a)

Signature of submitter or person authorised to sign on behalf of submitter
Sec 9(2)(a), Tongariro Tramping Club Incorporated.

26 February 2025

Please complete this form and send to permissionshamilton@doc.govt.nz (*Marked for the attention of J. Methorst*). You may also post your submission to: Director-General, c/o Department of Conservation, Private Bay 3072, Hamilton, 3240 (*Marked for the attention of J. Methorst*).



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Ngā Waihua o Paerangi Trust 118578-OTH

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C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

Sec 9(2)(a) . Visit Ruapehu

Address for Service (Postal Address):

Sec 9(2)(a) Post Code: Sec 9(2)(a)

Telephone: Sec 9(2)(a) Email Address: Sec 9(2)(a)

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

☐

I wish to be contacted alternately by: _____

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I wish to keep my contact details confidential

D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one) Do / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

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

Support for allowing the trail to be built as submitted

My submission is [include the reasons for your views]:

I support the concession application submitted by Ngā Waihua o Paerangi Trust for the development of Phase 2 of the Te Ara Mangawhero shared use trail near Ohakune. This project presents a significant opportunity for the region, providing multiple benefits across tourism, economic growth, improved safety, and cultural storytelling.

Enhancing Tourism and Economic Growth

The Ruapehu region is a major destination for both domestic and international visitors. The Mountains to Sea – Ngā Ara Tūhono Great Ride and the Round the Mountain track are crucial assets within this tourism framework, drawing many thousands of mountain bikers and hikers each year. The development of Phase 2 will further elevate Ruapehu's profile as an adventure tourism hub. By improving the visitor experience, this project will attract more tourists and encourage longer stays in the region, directly benefitting our surrounding towns. Increased visitor numbers translate to significant economic benefits, supporting existing businesses and creating new employment opportunities for locals.

Improving Safety and Accessibility

The proposed trail will replace a section of road with a purpose-built off-road track for both cyclists and hikers. Currently, pedestrians and cyclists must share Ohakune Mountain Road with vehicles, creating safety risks, especially during peak tourism seasons. By moving this section off-road, the new trail alignment will significantly reduce conflicts between different types of users and provide a safer, more enjoyable experience.

Cultural and Environmental Significance

Ngāti Rangi has a deep spiritual and cultural connection to Mount Ruapehu, and this project provides a unique opportunity for iwi to share their stories at place. Through the integration of cultural narratives and interpretive signage along the trail, visitors will gain a deeper understanding of the significance of Ruapehu to Ngāti Rangi and the wider rohe.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended, and the general nature of any conditions sought]:

The development of Phase 2 of Te Ara Mangawhero shared use trail presents an outstanding opportunity to enhance visitor experiences, improve safety, create local jobs, and showcase the rich cultural heritage of the region. We urge DoC to approve this application so building can commence.

G. Your Signature

Sec 9(2)(a)

Signature of submitter or person authorised to sign on behalf of submitter

Sec 9(2)(a)

Printed name of submitter or person authorised to sign on behalf of submitter

05 March 2025

Date

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I (circle one) Support / Neutral / Oppose this Application.

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I (circle one): Do / Do Not wish to be heard in support of this submission at a hearing.



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Do not send page one of this document with your submission. If you require additional space for providing your submission, please attach extra pages as needed and label according to the relevant section.

F. Submission

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

PLEASE ACCEPT MY LATE SUBMISSION
I DID NOT SEE NOTIFICATION FOR SAME
IN OHAKUNE

My submission is [include the reasons for your views]: THIS EXTENSION IS ECONOMICALLY VITAL


AS THE ^{TO OUR OHAKUNE TOWN!}  OF THE OHAKUNE COMMUNITY GROUP WHO MET SEVERAL YEARS TO PLAN AND SUPPORT THE STAGE TRAIL DOWN THE OHAKUNE MOUNTAIN RUN - OFF ROAD USING OLD FOOTPRINTS WHERE POSSIBLE AND TO PROMOTE THE BUILDING OF THE TRAIL BY OUR LOCAL NGATI RANGI IWI. AFTER SEVERAL YEARS OF PLANNING AND OBTAINING PERMISSION TEARS MANGAWHERO HAS BEEN DEVELOPED APPROX HALF WAY OF ORIGINAL APPROVED PLAN. THE OUTSTANDING REPORTS WE AS A COMMUNITY ARE THAT THE TRAIL IS WORLD CLASS SO STAGE II MUST CONTINUE PROMPTLY TO FULFIL

THE NEED OF OUR COMMUNITY VISITORS AS SOON AS POSSIBLE
What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

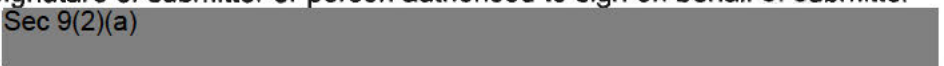
WITH STAGE II CONTINUE TO BE BUILT IN THE PROFESSIONAL WAY STAGE I HAS BEEN AS SOON AS PRACTICABLE

NO AMENDMENTS.

G. Your Signature


Sec 9(2)(a)

Signature of submitter or person authorised to sign on behalf of submitter


Sec 9(2)(a)

Printed name of submitter or person authorised to sign on behalf of submitter

7/3/2025
Date

Signature of submitter or person authorised to sign on behalf of submitter
Sec 9(2)(a)

Printed name of submitter or person authorised to sign on behalf of submitter

7/3/25

Date

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COMMENT SUBMISSION FORM
**Publicly notified application for leases,
licences, permits, or easements.**

**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

A. Permission Application Number and Name of Applicant

Ngā Waihua o Paerangi Trust 118578-OTH

B. Name of Proposed Activity and Location(s)

For phase 2 of a multi-staged approach to the trail known as Te Ara Mangawhero. The Applicant has applied for a 20-year licence for the development and operation of the trail. In addition, they have applied for a Works Approval under the Tongariro National Parks Management Plan for construction works and a 20-year filming permit.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

Sec 9(2)(a) on behalf of Mountains to Sea - Ngā Ara Tūhono Great Ride_

Address for Service (Postal Address): Sec 9(2)(a)

Telephone: Sec 9(2)(a) Email Address: Sec 9(2)(a) / info@mountainstosea.nz_

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

☐

I wish to be contacted alternately by: _____

☐

I wish to keep my contact details confidential

D. Statement of Support/Opposition

I (circle one) (**Support**) / ~~Neutral~~ / ~~Oppose~~ this Application.

E. Hearing Request

I (circle one): (**Do**) / ~~Do Not~~ wish to be heard in support of this submission at a hearing.

F. Submission

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

All sections

My submission is [include the reasons for your views]:

Introduction

Mountains to Sea – Ngā Ara Tūhono submits this letter in strong support of Ngā Waihua o Paerangi Trust's application for Phase 2 of Te Ara Mangawhero. As a governance partnership responsible for one of New Zealand's **23 Great Rides**, we recognize the significance of this project for both the cycling and walking communities and its wider economic, environmental, and cultural benefits for the Ruapehu region.

Support for Te Ara Mangawhero Phase 2

Phase 1 of Te Ara Mangawhero, funded through Kānoa and the NZ Cycle Trail Enhancement Fund, was successfully completed and officially opened on **1 November 2024**. This section has already demonstrated the demand for high-quality, scenic trails that celebrate the natural and cultural heritage of **Tongariro National Park with over 10,000 journeys completed to date**.

Phase 2 will complete the **21.4 km trail**, extending it to the Massey University Alpine Club Hut near **Tūroa**, further enhancing the experience for riders and walkers. This extension is an essential step toward completing the **Mountains to Sea – Ngā Ara Tūhono Great Ride**, which spans **over 320 km from Ruapehu to Whanganui**. The project aligns with our long-term vision to create a world-class cycling and walking network that contributes to regional prosperity and environmental sustainability.

Key Benefits of Phase 2

Cultural and Heritage Values

- Ngāti Rangi has provided leadership in the design and storytelling of this trail, ensuring its deep connection to the iwi and whenua of the Ruapehu District.
- The trail traverses' significant cultural landscapes and this trail will connect and bring to life the histories of both **Māori and early European settlement**.

Environmental Considerations

- Te Ara Mangawhero is being developed **with environmental integrity**, ensuring minimal impact on the natural landscapes of **Tongariro National Park, a Dual World Heritage site**.
- Sustainable trail-building practices, as demonstrated in Phase 1, will continue into Phase 2, ensuring the protection of fragile alpine and sub-alpine environments.
- The **Mountains to Sea – Ngā Ara Tūhono connected pathways** are integrally connected with our **environment and communities**. As a **Great Ride**, we are looking forward to having the **completed vision**, which will connect future generations to looking after and appreciating the **cultural and natural environments** in which we live.
- As part of the **kaitiaki of this Dual World Heritage Park**, along with our connections along the **Whanganui River and across two districts**, we aim to be part of ensuring that our environment is **supported to be in better condition than we have found it**.

Economic and Tourism Benefits

- **Regional Economic Impact:** The expansion of the Mountains to Sea trail network is expected to generate over **\$60 million annually** for the local economy once completed.
- **Job Creation:** The construction of Phase 2 will support **local contractors, trail builders, and hospitality providers**, many of whom have been impacted by downturns in forestry and tourism.

- **Year-Round Tourism Resilience:** The trail provides an alternative tourism offering to mitigate the challenges of unreliable winter ski seasons, supporting businesses and communities dependent on visitor revenue.
- **Alignment with the Ruapehu Destination Management Plan:** This project contributes to the Accelerate 25 goals by enhancing regional tourism infrastructure and creating sustainable visitor experiences.

Alignment with Conservation and Recreation Goals

- **Alignment with the Conservation Management Strategy (CMS):** The extension will continue to uphold the agreed principles for cycling and walking access within the National Park.
- **Visitor Experience & Safety:** The project enhances access to natural landscapes while ensuring safe, high-quality, managed infrastructure.
- **Connection to Other Trails:** The completion of this section bridges the missing link between the Tūroa ski field and Ohakune Old Coach Road and onwards, allowing for seamless multi-day cycling and walking journeys.

Conclusion

Mountains to Sea – Ngā Ara Tūhono fully supports Ngā Waihua o Paerangi Trust's application for Te Ara Mangawhero Phase 2. This project aligns with **DOC's goals for conservation, recreation, and cultural storytelling**, while also delivering **strong economic and social benefits** for the Ruapehu District.

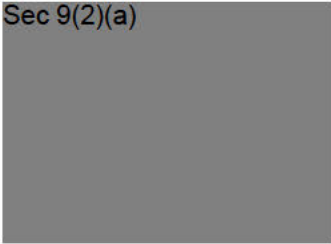
Additionally this project will help realise the vision for the wider trail and all the benefits it will bring.

We urge the Department of Conservation to approve this application and enable this vital project to proceed.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended, and the general nature of any conditions sought]:

G. Your Signature

Sec 9(2)(a)



Signature of submitter or person authorised to sign on behalf of submitter

Sec 9(2)(a)

Printed name of submitter or person authorised to sign on behalf of submitter

__05/03/2025

Date

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COMMENT SUBMISSION FORM

Publicly notified application for leases, licences, permits, or easements.

This form is to be used to provide submissions concerning publicly notified applications for leases, licences, permits, or easements under section Sections 17SC and 49 of the Conservation Act 1987.

Notes to Submitter:

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Closing Date: The closing date and time for serving submissions to the Director-General on this matter is 5:00pm on 5 March 2025 (Wednesday).

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Note: Include pages two and three of this form with your response to DOC. Do not include page one.

A. Permission Application Number and Name of Applicant

Ngā Waihua o Paerangi Trust 118578-OTH

B. Name of Proposed Activity and Location(s)

For phase 2 of a multi-staged approach to the trail known as Te Ara Mangawhero. The Applicant has applied for a 20-year licence for the development and operation of the trail. In addition, they have applied for a Works Approval under the Tongariro National Parks Management Plan for construction works and a 20-year filming permit.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

Sec 9(2)(a) - Waireka Accommodation and R Design (Architectural Design)

Address for Service (Postal Address): Sec 9(2)(a)

Post Code: Sec 9(2)(a)

Telephone: Sec 9(2)(a)

Email Address: Sec 9(2)(a)

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

☐

I wish to be contacted alternately by: _____

☐

I wish to keep my contact details confidential

D. Statement of Support/Opposition

I (circle one) **Support** / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): **Do** / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

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

This submission relates to all aspects of the application.

For phase 2 of a multi-staged approach to the trail known as Te Ara Mangawhero.

The Applicant has applied for a 20-year licence for the development and operation of the trail.

In addition, they have applied for a Works Approval under the Tongariro National Parks Management Plan for construction works and a 20-year filming permit.

My submission is [include the reasons for your views]:

I request that this submission is accepted as a late submission as the notification of this was missed and I was only notified about it yesterday.

I fully support the application as presented.

As a provider of short stay Visitor Accommodation this project is a key element in the tourist development of Ohakune and the Ruapehu Region.

The growth of cycle tourism in Ohakune has seen a significant increase in visitors coming into the area. This growth in visitors leads to an increasing demand for supports services.

This then leads on to an increase in the permanent population to run the businesses.

All of this growth is good for the area and in sync with the desire of Central Government to see Tourism as the number one export earner for the NZ economy.

The completion of the trail and the management of the trail

by Ngā Waihua o Paerangi Trust 118578-OTH is key to the growth of the Ruapehu Region

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

G. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter

Sec 9(2)(a) - Waireka Accommodation and R Design (Architectural Design)

Printed name of submitter or person authorised to sign on behalf of submitter

7 March 2025

Date

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B. Name of Proposed Activity and Location(s)

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C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

Sec 9(2)(a) The Kitchen La Pizzeria Thames St Junction

Ohakune

Address for Service (Postal Address): Box 145

Sec 9(2)(a)

Post Code:

Sec 9(2)(a)

Telephone: Sec 9(2)(a) Email Address: Sec 9(2)(a)

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

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I wish to be contacted alternately by: _____

☐

I wish to keep my contact details confidential

D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): **Do** / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

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

PLEASE ACCEPT THIS AS A LATE SUBMISSION. THE NOTIFICATION THAT THIS PROJECT WAS CALLING FOR SUBMISSIONS WAS UNFORTUNATELY MISSED BY MANY IN THE LOCAL COMMUNITY.

Assessment of Environmental Effects:

Section 7.1.1 Recreation Opportunities

Section 7.1.2 Tourism & Economic Development.

My submission is [include the reasons for your views]:

Sec 9(2)(a) is in full support of the application by Nga Waihua o Paerangi Trust for a licence to develop and operate a trail in Tongariro National Park.

The completion of Phase 2 of the trail is vital to ensure that the economic benefits of the complete trail are realised. The projected 41,000 visitors that are expected to use this trail will have a transformative impact on Ohakune and the whole Ruapehu District. As a business owner in the Junction, Ohakune I recognize the importance that this trail will have to our local community.

Tourism is the second largest employer in our region and our growth engine. It is self-evident that we need our tourism sector to thrive to ensure our local businesses stay in business thereby providing employment for our local community. The cycleways provide much needed resilience for our tourist economy.

The completed trail will greatly enhance the recreational opportunities in and around Ohakune, including the Junction not only for cycling, but also through the improvements to various walking trails proposed in the application.

Equally as important is the wellbeing of our local community. The improvement of all outdoor recreational facilities provides immeasurable benefit to our people. It also helps with creating employment and the ability to provide employment opportunities that benefit our community.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

No amendments are proposed. I have reviewed the Effects outlined in sections 7.2 to 7.10. I am confident that the effects (including any potential negative effects) of this trail have been thoroughly considered and are confident that the project will be well executed by competent parties.

G. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter
Sec 9(2)(a)

Printed name of submitter or person authorised to sign on behalf of submitter

7/3/25
Date

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C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

Sec 9(2)(a), Sec 9(2)(a) Ohakune Community Charitable
Trust

Address for Service (Postal Address):

Sec 9(2)(a)

Post Code:

Sec 9(2)(a)

Telephone: Sec 9(2)(a)

Email Address: Sec 9(2)(a)

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

☐ I wish to be contacted alternately by: _____

☐ I wish to keep my contact details confidential

D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): **Do** / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

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

PLEASE ACCEPT THIS AS A LATE SUBMISSION. THE NOTIFICATION THAT THIS PROJECT WAS CALLING FOR SUBMISSIONS WAS UNFORTUNATELY MISSED BY MANY IN THE LOCAL COMMUNITY.

Assessment of Environmental Effects:

Section 7.1.1 Recreation Opportunities

Section 7.1.2 Tourism & Economic Development.

My submission is [include the reasons for your views]:

The Ohakune Community Charitable Trust ('OCCT')* is in full support of the application by Ngā Waihua o Paerangi Trust for a licence to develop and operate a trail in Tongariro National Park.

The completion of Phase 2 of the trail is vital to ensure that the economic benefits of the complete trail are realised. The projected 41,000 visitors that are expected to use this trail will have a transformative impact on Ohakune and the whole Ruapehu District.

Tourism is the second largest employer in our region and our growth engine. It is self-evident that we need our tourism sector to thrive to ensure our local businesses stay in business thereby providing employment for our local community. The cycleways provide much needed resilience for our tourist economy.

The completed trail will greatly enhance the recreational opportunities in and around Ohakune, not only for cycling, but also through the improvements to various walking trails proposed in the application.

Equally as important is the wellbeing of our local community. The improvement of all outdoor recreational facilities provides immeasurable benefit to our people.

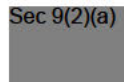
*The OCCT (and its predecessor entities Ohakune2000 and OhakuneInc) have been working for the betterment of Ohakune and surrounds for over 25 years. Through a team of dedicated volunteers the organisation has led and executed many iconic projects in our town, including - Carrot Park, Ohakune Mainstreet & Junction Upgrade, iSite, Mangawhero River Walkway, Disc Golf Park and the Old Coach Road.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

No amendments are proposed. We have reviewed the Effects outlined in sections 7.2 to 7.10. We are confident that the effects (including any potential negative effects) of this trail have been thoroughly considered and we are confident that the project will be well executed by competent parties.

G. Your Signature

Sec 9(2)(a)



Signature of submitter or person authorised to sign on behalf of submitter

Printed name of submitter or person authorised to sign on behalf of submitter

7/3/25
Date

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C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

Sec 9(2)(a), Pure Turoa

Limited

Address for Service (Postal Address): Sec 9(2)(a)

Sec 9(2)(a)

Post Code: Sec 9(2)(a)

Telephone: Sec 9(2)(a)

Email Address: Sec 9(2)(a)

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☐

I wish to keep my contact details confidential

D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): **Do** / **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

PLEASE ACCEPT THIS AS A LATE SUBMISSION.

Assessment of Environmental Effects:

Section 7.1.1 Recreation Opportunities

Section 7.1.2 Tourism & Economic Development.

My submission is [include the reasons for your views]:

Pure Turoa Ltd fully supports the Ngā Waihua o Paerangi Trust's application for a licence to develop and operate a trail within Tongariro National Park. The projection that the completed trail will attract approximately 41,000 visitors to the Ruapehu District is of paramount importance for the community in Ohakune, in sustaining business to operate full time, and fostering the growth of a sustainable tourism economy.

The successful completion of Phase 2 of the trail is essential, particularly given the substantial investment already made in its development. This phase is critical for unlocking the significant economic benefits that this initiative promises. The positive impact of the initial trail opening has already been evident, bolstering local businesses and providing valuable recreational opportunities for residents who are discovering and enjoying their own backyard.

Tourism is the second-largest employer in our region and serves as a primary driver of economic growth. It is evident that the prosperity of our tourism sector is critical for maintaining local enterprises and providing employment opportunities for our community.

Moreover, the completed trail will greatly enrich recreational options in and around Ohakune, not only for cycling but also through the proposed enhancements to various walking trails outlined in the application. Promoting knowledge and appreciation of the national park is crucial in educating future generations about its significance, as well as the necessity of cultivating economically responsible tourism practices. This initiative represents not only an economic opportunity but also a commitment to environmental stewardship and community engagement.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

No amendments are proposed. We have reviewed the Effects outlined in sections 7.2 to 7.10.

We are comfortable that the Effects detailed in sections 7.2 to 7.10 have been thoroughly considered and we are confident that the project will be executed by competent parties.

Sec 9(2)(a)

Signature of submitter or person authorised to sign on behalf of submitter
Sec 9(2)(a)

Printed name of submitter or person authorised to sign on behalf of submitter

____7/3/25_____
Date

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Ngā Waihua o Paerangi Trust 118578-OTH

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C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

Sec 9(2)(a) Member of Future Ohakune Governance

Group. _____

—

Address for Service (Postal Address): Sec 9(2)(a)

Sec 9(2)(a)

Post Code:

Sec 9(2)(a)

Telephone: Sec 9(2)(a) Email Address: Sec 9(2)(a)

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I wish to be contacted alternately by: _____

☐

I wish to keep my contact details confidential

D. Statement of Support/Opposition

I (circle one) **Support** this Application.

E. Hearing Request

I (circle one): **Do Not** wish to be heard in support of this submission at a hearing.

F. Submission

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

PLEASE ACCEPT THIS AS A LATE SUBMISSION. THE NOTIFICATION THAT THIS PROJECT WAS CALLING FOR SUBMISSIONS WAS UNFORTUNATELY MISSED BY MANY IN THE LOCAL COMMUNITY.

Assessment of Environmental Effects:

Section 7.1.1 Recreation Opportunities

Section 7.1.2 Tourism & Economic Development.

My submission is [include the reasons for your views]:

As a member of the Future Ohakune Governance group* and dual resident of Ohakune I am in full support of the application by Nga Waihua o Paerangi Trust for a licence to develop and operate a trail in Tongariro National Park.

Phase I of the trail has already proved to be very popular notwithstanding that it is only partially complete. Continuation and completion of Phase 2 of the trail is not only essential to unlock the economic benefits but is already adding to the outstanding reputation of the Ohakune and surrounding district as a mountain bike and low-level family walking / hiking destination. Given the publicity of the total trail over recent years and especially following the completion of phase 1 to not proceed would be totally unexpected and a significant disappointment not only to the active public but also to the town and surround district already trying to recover from recent closures and insolvency of RAL. As it is a shared trail the benefits of hiking / walking the trail is very high especially as it is mostly at low levels, with clear loop trails. It is ideal for family walking.

The projected 41,000 visitors that are expected to use this trail will have a transformative impact on Ohakune and the whole Ruapehu District.

Tourism is the second largest employer in our region and our growth engine. It is essential for tourism sector to thrive and develop to ensure our local businesses stay in business thereby providing employment for our local community. The cycleways provide much needed resilience for our tourist economy.

The completed trail will greatly enhance the recreational opportunities in and around Ohakune, not only for cycling, but also through the improvements to various walking trails proposed in the application. The trail will be an essential part of creating a mountain bike and walking trails interlinked network. Participants particularly like linked networks rather than single return trails.

Equally as important is the wellbeing of our local community. The improvement of all outdoor recreational facilities provides immeasurable benefit to our people.

*The Future Ohakune Governance Group membership comprises representatives of Ruapehu District Council, Ngati Rangi, Waimarino / Waiohuru Community Board and the Business and town folk of Ohakune. The GG has completed extensive public consultation and prepared a detailed Future Ohakune Spatial Plan with particular focus on development of activity based infrastructure in and around the world heritage National Park and the town and district.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

No amendments are proposed. We have reviewed the Effects outlined in sections 7.2 to 7.10. We are confident that the effects (including any potential negative effects) of this trail have been thoroughly considered and we are confident that the project will be well executed by competent parties.

G. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter
Sec 9(2)(a)

Printed name of submitter or person authorised to sign on behalf of submitter

__7/3/25_____
Date

Please complete this form and send to permissionshamilton@doc.govt.nz (*Marked for the attention of J. Methorst*). You may also post your submission to: Director-General, c/o Department of Conservation, Private Bay 3072, Hamilton, 3240 (*Marked for the attention of J. Methorst*).



This form is to be used to provide submissions concerning publicly notified applications for leases, licences, permits, or easements under section Sections 17SC and 49 of the Conservation Act 1987.

Notes to Submitter:

Please download and complete this form, scan and send to permissionshamilton@doc.govt.nz. You may also mail your submission to: Director-General, c/o Department of Conservation, Private Bag 3072, Hamilton, 3240.

Closing Date: The closing date and time for serving submissions to the Director-General on this matter is 5:00pm on 5 March 2025 (Wednesday).

Please note that submissions are public documents. Your name and submission will be included in documents that are available to the media and the public. You may request that your contact details be kept confidential, but your name, organisation and your submission itself will become a public document.

Privacy:

The Department will deal with any personal information you supply in your submission in accordance with the Privacy Act 1993. The Department will only use your contact details for the purposes of processing the notified permissions application that it relates to (or in exceptional circumstances for other reasons permitted under the Privacy Act 1993).

Where your submission is made publicly available, your contact details will be removed only if you have indicated this as your preference in the tick box on page two.

Under the Privacy Act 1993, you may request the right of access to, and correction of, personal information provided in this submission.

The Department is likely to post your submission on its website at www.doc.govt.nz. Once submitted, submitters' information is subject to the Official Information Act 1982 and may be released under that Act.

Do not send page one of this document with your submission. If you require additional space for providing your submission, please attach extra pages as needed and label according to the relevant section.

**Note: Include pages two and three of this form with your response to DOC.
Do not include page one.**

A. Permission Application Number and Name of Applicant

Ngā Waihua o Paerangi Trust 118578-OTH

B. Name of Proposed Activity and Location(s)

For phase 2 of a multi-staged approach to the trail known as Te Ara Mangawhero. The Applicant has applied for a 20-year licence for the development and operation of the trail. In addition, they have applied for a Works Approval under the Tongariro National Parks Management Plan for construction works and a 20-year filming permit.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

Sec 9(2)(a)

Address for Service (Postal Address):

Sec 9(2)(a)

Sec 9(2)(a)

Post Code:

Sec 9(2)(a)

Telephone:

Sec 9(2)(a)

Email Address:

Sec 9(2)(a)

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

☐ I wish to be contacted alternately by: _____

☐ I wish to keep my contact details confidential

D. Statement of Support/Opposition

I (circle one) / Support Neutral / Oppose this Application.

E. Hearing Request

I (circle one): **Do** / Do Not wish to be heard in support of this submission at a hearing.

F. Submission

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

PLEASE ACCEPT THIS AS A LATE SUBMISSION. THE NOTIFICATION THAT THIS PROJECT WAS CALLING FOR SUBMISSIONS WAS UNFORTUNATELY MISSED BY MANY IN THE LOCAL COMMUNITY.

Assessment of Environmental Effects:

Section 7.1.1 Recreation Opportunities

Section 7.1.2 Tourism & Economic Development.

My submission is [include the reasons for your views]:

Under Construction is in full support of the application by Ngā Waihua o Paerangi Trust for a licence to develop and operate a trail in Tongariro National Park.

Tourism is a huge part of our area. The cycleways provide much needed resilience for our tourist economy. Ohakune is slowly growing in summer and getting more and more visitors in what used to be our off season.

Phase 1 of the trail has had nothing but positive comments, this has created an outdoor activity for local and visiting families to enjoy. Phase 2 will be just as essential and help with the growth of visitors. The completion of Phase 2 of the trail is vital to ensure that the economic benefits of the complete trail are realised.

Ohakune needs upgrades and recreational activities to keep the town busy and businesses to keep businesses turning over.

Under Construction is a local business and we strongly believe things like the cycle trail are essential to continue the growth and development of the town.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

No amendments are proposed. We have reviewed the Effects outlined in sections 7.2 to 7.10. We are confident that the effects (including any potential negative effects) of this trail have been thoroughly considered and we are confident that the project will be well executed by competent parties.

G. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter
Sec 9(2)(a)

Printed name of submitter or person authorised to sign on behalf of submitter

__7/3/25_____
Date

Please complete this form and send to permissionshamilton@doc.govt.nz (*Marked for the attention of J. Methorst*). You may also post your submission to: Director-General, c/o Department of Conservation, Private Bay 3072, Hamilton, 3240 (*Marked for the attention of J. Methorst*).

From: [Permissions Updates](#)
To: [Joke Methorst](#)
Subject: FW: Submission in support by NZCT Inc of Nga Waihua o Paerangi Trust - Te Ara Mangawhero - Phase 2
Date: Friday, 7 March 2025 9:30:43 am
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.png](#)

From: Sec 9(2)(a)
Sent: Thursday, 6 March 2025 7:46 pm
To: Permissions Hamilton <permissionshamilton@doc.govt.nz>
Cc: Sec 9(2)(a)
Subject: Submission in support by NZCT Inc of Nga Waihua o Paerangi Trust - Te Ara Mangawhero - Phase 2

Some people who received this message don't often get email from Sec 9(2)(a) [Learn why this is important](#)

Submission in Support of Ngā Waihua o Paerangi Trust's Application for Te Ara Mangawhero Phase 2

To: Director-General, Department of Conservation
Email: permissionshamilton@doc.govt.nz
Subject: Submission in Support – Ngā Waihua o Paerangi Trust – Te Ara Mangawhero Phase 2

Submitted by: Ngā Haerenga New Zealand Cycle Trails Inc. (NZCT)
Contact Person: Sec 9(2)(a) NZCT Inc , and Sec 9(2)(a) NZCT Inc

Introduction

Ngā Haerenga New Zealand Cycle Trails Inc. (NZCT) strongly supports Ngā Waihua o Paerangi Trust's application for Te Ara Mangawhero Phase 2. As the national body overseeing New Zealand's network of 23 Great Rides, we recognise the vital role this project plays in enhancing the Mountains to Sea – Ngā Ara Tūhono Great Ride, delivering national, regional, and local benefits.

Te Ara Mangawhero is a critical section of the Mountains to Sea – Ngā Ara Tūhono Great Ride, contributing to the safety, connectivity, and visitor experience of this iconic multi-day cycling route. The completion of Phase 2 will allow for a more seamless and accessible journey, strengthening New Zealand's reputation as a world-class cycling destination.

Key Benefits of Te Ara Mangawhero Phase 2:

Strengthening New Zealand's Great Rides Network

The Mountains to Sea – Ngā Ara Tūhono Great Ride is one of New Zealand's premier multi-day cycling experiences, offering over 320 km of world-class riding.

Completing Phase 2 of Te Ara Mangawhero closes a crucial missing link,

improving connectivity between Tūroa, Ohakune Old Coach Road, and the wider Great Ride network.

NZCT prioritises the completion, maintenance and development of safe, high-quality trails, and this section ensures riders and walkers can enjoy a well-formed, scenic, and culturally rich route.

Economic and Tourism Growth

The completion of Te Ara Mangawhero will increase visitor numbers, driving significant regional and local economic benefits for the Ruapehu and Whanganui Districts.

The Great Rides generate over \$950 million annually in regional economic benefits nationally; completing this section will further contribute to local businesses, accommodation providers, and tourism operators.

This project supports New Zealand's tourism recovery efforts, providing sustainable, year-round visitor attractions beyond traditional seasonal tourism.

Cultural and Environmental Leadership

Developed in partnership with Ngāti Rangi, Te Ara Mangawhero ensures that iwi narratives, tikanga, and environmental stewardship are embedded in the trail experience.

This project aligns with the principles of conservation, sustainable tourism, and cultural integrity, reinforcing the New Zealand Cycle Trail's commitment to protecting and celebrating our natural and cultural heritage.

Conclusion

NZCT fully supports Ngā Waihua o Paerangi Trust's application for Te Ara Mangawhero Phase 2. The completion of this section will enhance the Mountains to Sea – Ngā Ara Tūhono Great Ride, providing better access, greater economic benefits, and a richer cultural experience for riders and walkers.

We urge the Department of Conservation to approve this application and support the ongoing development of New Zealand's Great Rides network.

Ngā mihi nui,

Sec 9(2)(a)

Sec 9(2)(a) of Ngā Haerenga New Zealand Cycle Trails Inc.

Ngā mihi

Sec 9(2)(a)

Sec 9(2)(a) NZCT Inc



Sec 9(2)(h)



This communication is confidential and may contain legally privileged information. By the use of email over the Internet Le Pine & Co is not waiving either confidentiality of, or legal privilege in, the content of the email and of any attachments. If the recipient of this message is not the intended addressee, please call the practice immediately at our cost.

No responsibility is accepted for changes made to this email or to any attachments, after transmission from this office.

F. Submission

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

PLEASE EXCEPT THIS LATE SUBMISSION. IT SEEMS THE NOTIFICATION WAS NOT SENT TO OHAKUNE.

My submission is [include the reasons for your views]:

THE STAGE 2 OF THE TE ARA MANGAHIA IS VITALY IMPORTANT TO THE ONGOING SURVIVAL OF OHAKUNE BUSINESSES.

THE OHAKUNE BUSINESS NETWORK REPRESENTS APPROX 80 DIFFERENT BUSINESSES IN THE OHAKUNE DISTRICT.

IN 2009 WHEN THE OHAKUNE OLD COACH RD WAS ONE OF THE 1ST CYCLEWAYS TO BE OPENED, IT HAS MEANT 5 CAFES & 5 RESTAURANTS ARE NOW OPEN ALL YEAR ROUND. WITH THE DEMISE OF WPM & THE TANIHIA MILL IT HAS MEANT LOCAL BUSINESS IS DEPENDENT ON TOURISM FROM SKIING IN WINTER AND MOUNTAIN BIKING IN SUMMER.

THE STAGE 2 IS VITAL FOR THE AREA TO CONTINUE TO GROW & PROVIDE EMPLOYMENT OPPORTUNITIES FOR LOCALS.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

STAGE 2 CONTINUE TO PROGRESS AS PROPOSED AS SOON AS PRACTICAL.

NO AMENDMENTS

G. Your Signature

Sec 9(2)(a)

Signature of submitter or person authorised to sign on behalf of submitter
Sec 9(2)(a)

Printed name of submitter or person authorised to sign on behalf of submitter

OF OHAKUNE BUSINESS NETWORK

Date

7-3-25

Note: Include pages two and three of this form with your response.
Do not include page one.

A. Permission Application Number and Name of Applicant

Ngā Waihua o Paerangi Trust 118578-OTH

B. Name of Proposed Activity and Location(s)

For phase 2 of a multi-staged approach to the trail known as Te Ara Mangawhero. The Applicant has applied for a 20-year licence for the development and operation of the trail. In addition, they have applied for a Works Approval under the Tongariro National Parks Management Plan for construction works and a 20-year filming permit.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

OHAKUNE BUSINESS NETWORK

Address for Service (Postal Address):

Sec 9(2)(a)

Post Code:

Sec 9(2)(a)

Telephone: Sec 9(2)(a)

Email Address: Sec 9(2)(a)

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

- ☐ I wish to be contacted alternately by: _____
- ☐ I wish to keep my contact details confidential

D. Statement of Support/Opposition

I (circle one) Support / Neutral / Oppose this Application.

E. Hearing Request

I (circle one): Do / ~~Do Not~~ wish to be heard in support of this submission at a hearing.

Note: Include pages two and three of this form with your response to DOC.
Do not include page one.

A. Permission Application Number and Name of Applicant

Ngā Waihua o Paerangi Trust 118578-OTH

B. Name of Proposed Activity and Location(s)

For phase 2 of a multi-staged approach to the trail known as Te Ara Mangawhero. The Applicant has applied for a 20-year licence for the development and operation of the trail. In addition, they have applied for a Works Approval under the Tongariro National Parks Management Plan for construction works and a 20-year filming permit.

C. Submitter Information-

Full Name (also list organisational name if submitting on behalf of a business, community group, etc.):

TCB SKI BOARD & BIKE LTD

Address for Service (Postal Address): 29 AYRE ST ONAKEUNE

Post Code: 4625

Telephone: 063858433

Email Address: Sec 9(2)(a)

Note: Communication from DOC will be via e-mail unless alternate contact is requested below.

☐ I wish to be contacted alternately by: _____

☐ I wish to keep my contact details confidential

D. Statement of Support/Opposition

I (circle one) Support / ~~Neutral~~ / ~~Oppose~~ this Application.

E. Hearing Request

I (circle one) Do / ~~Do Not~~ wish to be heard in support of this submission at a hearing.

F. Submission

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

PLEASE ACCEPT THIS LATE SUBMISSION, THE RECCURMENT WAS ONLY NOTIFIED TO US 1 DAY AGO.

My submission is [include the reasons for your views]: THE STAGE 2 EXTENSION IS VITAL TO OHAKUNE & SURROUNDING DISTRICT.

TCLB SKI BOARD & BIKE WAS ONE OF THE 1ST BUSINESSES TO PROMOTE MOUNTAIN BIKING AFTER THE OPENING OF THE OHAKUNE OLD COACH ROAD IN 2010, OUR BUSINESS USED TO CLOSE FOR 5 MONTHS, BUT SINCE MOUNTAIN BIKING, WE NOW EMPLOY 10 LOCALS ALL THROUGH SUMMER.

IN 2009 YOU COULD NOT GET A CUP OF COFFEE IN OHAKUNE BETWEEN XMAS & NEW YEAR, NOW THERE ARE 5 CAFES & 5 RESTAURANTS OPEN ALL YEAR ROUND.

THE FINANCIAL EFFECT OF MOUNTAIN BIKING AROUND THE DISTRICT IS HUGE, PLUS EMPLOYMENT FOR LOCALS.

THE BIKE TRAILS NOT ONLY SUPPORT OUR BUSINESS, BUT TRANSPORT, ACCOMMODATION, RESTAURANTS, CAFES, PETROL STATIONS ETC, THE ALL EMPLOY LOCALS. THE COMMUNITY NEEDS THIS TRAIL TO KEEP GROWING.

What outcomes would you like to address with your submission? [give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought]:

THE STAGE 2 NEEDS TO BE OPERATING AS SOON AS POSSIBLE.
THE 11 YEAR DELAY FROM THE ORIGINAL PERMISSION HAS SEEN ONLY THE 1ST STAGE COMPLETED WITH THE MONEY GRANTED FOR THE WHOLE TRAIL.

NO AMENDMENTS

G. Your Signature

Sec 9(2)(a)

Signature of submitter, or person authorised to sign on behalf of submitter
Sec 9(2)(a)

Printed name of submitter or person authorised to sign on behalf of submitter

TCLB SKI BOARD & BIKE

Date

7-3-2025