



## A. Permission Application Number and Name of Applicant **SUB 251**

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	Rachel Hall
Organisation	n/a
Date	8/02/2024

## 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:

Licence and lease to operate the Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years.

My reasons for my objection or submission are:

The application is consistent with the Tongariro National Park Management Plan which provides for skiing related activities to occur within the Tūroa amenities area. The management plan in turn, is consistent with the higher level legislation including the National Parks Act. The key reason being that it will preserve access to part of the Tongariro National Park for the benefit, use and enjoyment of the public.

Granting the concession and lease to Pure Tūroa Limited will:

- provide for the public enjoyment of the magnificent natural and cultural heritage of this part of Mt Ruapehu.
- provide for recreational opportunities for skiers and the public generally. This includes tourists and trampers accessing national park using the skifield access road and skifield lifts.
- provide national and regional benefits through the provision of employment and tourism opportunities in the Ruapehu district.

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

I support the application and do not seek any amendments.

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## 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



Department of  
Conservation  
Te Papa Ahurea

New Zealand Government

## A. Permission Application Number and Name of Applicant

**SUB 252**

Pure Tūroa Limited 109883-SKI

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Printed name of submitter or person authorised on behalf of submitter	Erin Larsen
Organisation	The Nail Place Ohakune
Date	8 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

Permissions Application Number 109883-SKI

#### F.Objection or submission

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



My reasons for my objection or submission are:

I believe having a company of people who are from here, fully invested in our mountain, and 100% believe it will continue to be a strong tourism vantage point, will not only bring more people the area, but will also help local businesses to thrive. It's exhausting seeing our town lack vivaciousness and excitement during months when it should have been the opposite. With new owners brings fresh eyes. Particularly those who have the experience and knowledge behind them to carry Turoa forward.

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

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



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### How do I submit my objection or submission?

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

**OBJECTION OR SUBMISSION**

**OBJECTION OR SUBMISSION**



## A. Permission Application Number and Name of Applicant **SUB 253**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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## C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Shelly Brock
Organisation	Black Sand Pizzeria
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:

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.

---

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## A. Permission Application Number and Name of Applicant **SUB 254**

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	Ayla Fryer
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:

I support the entire application

My reasons for my objection or submission are:

It is the best chance for the Ohakune community to continue to thrive, and Turoa ski field. The benefits of Pure Turoa operating significantly outweigh any other submissions that have been put forward. Turoa desperately needs renewed infrastructure and the only way we can get that is with more investment, which Pure Turoa are willing and able to provide.

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 ski field needs to be sold so people can start moving on with their lives and planning for the future. The amount of time we have been waiting around with our lives in limbo on our jobs and livelihoods is frustrating.

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**How do I submit my objection or submission?**

## A. Permission Application Number and Name of Applicant SUB 255

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	Jane Hutchings
Organisation	
Date	08/02/2024

## 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:

Supportive of the application

My reasons for my objection or submission are:

Supportive of PTL's application as it will help protect snow sports in the central north island and will allow for further growth and opportunities in the surrounding region(s).

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.

NA

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## A. Permission Application Number and Name of Applicant SUB 256

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	Taryn Smith
Organisation	Private individual
Date	8/02/2024

## 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

Permissions Application Number 109883-SKI

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## 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:

Tūroa ski field, now more than ever, requires effective financial and operational management for a considerable time period. Pure Turoa Ltd's proposal, in my view, stands out as the most thorough and practical plan among those submitted to DOC for achieving this objective. We advocate for DOC's approval of the lease and operating license for Tūroa Ski Area for a duration of 10 years, as we believe it serves the best interests of DOC, current RAL employees (under liquidation), taxpayers, residents, business owners in the Central Plateau, tourists, and the general public.

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?**

## A. Permission Application Number and Name of Applicant SUB 257

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

### C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	PAUL SUTHERLAND
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:

Support the concession to Pure Turoa

My reasons for my objection or submission are:

Pure Turoa are committed to operating Turoa Ski Area and there are no other realistic options on the table.

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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## G. Attachments

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Date submitted: 2024-02-07

Director General  
Department of Conservation  
Permissions Hamilton  
Private Bag 3072  
Hamilton 3240

Attention: Lynette Trewavas - Senior Permissions Advisor

### **Submission on Tūroa Ski Field Concession Application**

Ruapehu Skifields Stakeholders Association (RSSA) welcomes the opportunity to participate in, and provide feedback on, the application by Pure Tūroa Limited to operate recreational and tourism operations within the Tongariro National Park.

### **Vision and Background of RSSA**

The RSSA was started by a mix of volunteers from the local community, life pass holders, season pass holders, former mountain staff and local businesses. Several of the founding members were members of the RAL Shareholders and Life Pass Holders Group. The RAL Shareholders and Life Pass Holders Facebook Group was originally created in 2016 as a place for the shareholders of RAL to connect together and discuss areas of common interest regarding the company. Over time, the group had advocated for more transparency from the Company, Board of Directors, and the Shareholding Trust (who acts as the legal majority shareholder).

The RSSA has a large representative base of 1000 plus financial members and donors. As well as representing tens of thousands of mountain users and life pass holders via the Save Mt Ruapehu website, mailing list and Facebook groups. Based on our large surveys of these mountain users the people's vision for the Whakapapa and Turoa Skifields is to:

- Retain both Tūroa and Whakapapa under the same ownership and governance.
- Retain a community ownership structure and governance model.
- Finance the operation through crowdfunding, long-term product pre-sales, and equity investment from the skiing community.

This was further supported by the vote outcomes of the watershed meeting.



## **Submission**

RSSA, as representatives of tens of thousands of stakeholders, are opposed to the concession application from Pure Tūroa Limited due to several negative downstream impacts.

We are firmly of the view that maintaining and enhancing not for profit skifield operations on Mount Ruapehu is a critical priority for all stakeholders, most importantly Iwi and local residents, and for the thousands of members of the public that visit every year.

Our members are passionate skiers and snowboarders, lovers of the Maunga, everything it represents, and everything that happens on it. Ruapehu provides the primary North Island access for winter snowsports. We are acutely aware that skiing on Ruapehu is vital for the economic and social wellbeing of communities in the Central North Island.

The importance of the mountain to everyone is eloquently captured in the *Tongariro National Park Management Plan* where it says, "In New Zealand, national parks are areas of publicly owned land that are preserved in perpetuity for their intrinsic worth and for the benefit, use and enjoyment of the public." The management plan reflects the intent of the National Parks Act.

## **Primary Concerns**

We do not believe that the application for concessions by Pure Tūroa Limited is well aligned with the Management Plan (or Act) just quoted, with other earlier and current proposed options being more aligned. More importantly, the timing of granting a concession to a privately owned operation does not reflect well on current Treaty negotiations in the region, with Tongariro National Park being at the heart of these negotiations. Treaty obligations are firmly embedded in the Conservation Act and the Conservation Management Strategy. Although these two concerns are the most pertinent, there are other concerns we will elaborate on later.

## **Positive Aspects**

There are a number of aspects within Pure Tūroa's application that we consider are positive, and for that, they are to be commended. These are as follows:

### *Low environmental impact of operations:*

Pure Tūroa outlines their vision for reducing the environmental impact of their operations within the Tūroa Ski Area. Whilst we have some concerns over aspects of how this will be achieved, we are generally in full support of implementing measures to ensure skifield

operations appropriately minimise environmental impact. In particular, we are supportive of all measures which:

- Minimise the disturbance to natural flora and fauna
- Minimise the risk to contaminants to land and waterbodies
- Reduce energy use, particularly the use of fossil fuels
- Reduce the production of solid waste, particularly that sent to landfill.

#### *Summer Activities:*

Pure Tūroa outlines a desire to establish low impact summer operations within the Tūroa Ski Area. RSSA would like more information about proposed summer activities, and acknowledge that this could provide financial diversification, and may provide a local tourism benefit year-round.

However, RSSA understands that these positive environmental aspirations were already being pursued by RAL so there is nothing uniquely different being proposed by PTL to that of the current concession holder.

## **Negative Impacts**

### *Reduction in lift capacity:*

RSSA fully supports the removal of infrastructure that is truly redundant and has no further use, such as buildings, pylon foundations, cables and pipes. However, the removal of ski area lifts concentrates skiers and snowboarders onto fewer lifts, reducing the spread of customers over the field, and eroding the overall customer experience. In particular, the Nga Wai Heke opens up access to the Triangle and the Glacier areas, which provides exceptional skiing and snowboarding when conditions permit. This area can often be Tūroa's finest experience and is looked forward to by many as a highlight in the season.

We don't believe there is much merit on environmental grounds. The infrastructure is already in place, and a far larger part of the damage is caused by construction rather than the pre-existence of the pylons and stations.

Running additional terrain like the Triangle and the Glacier make the field more attractive to a diverse range of visitors who might otherwise choose to go to the South Island. Keeping customer satisfaction high is imperative to financial viability, and more importantly to the region generally.

The proposal that the Giant and Wintergarden lifts also be removed and that both the Parklane and the Movenpick lifts be replaced by a single lift, means that only two lifts will be operating on the whole upper mountain. This will create some major issues:

- 1) Regardless of how new and well maintained a lift is, it will still experience outages, sometimes caused by unavoidable ice build-up and other weather events. This considerably increases the risk of the ski area being partially or fully inaccessible.



- 2) Reducing lifts channels the customers into choke areas on the mountain, creating a significant impact on visitor experience and enjoyment, and overloading key parts of the mountain.
- 3) Reduced lifts places skiers of all abilities into the same areas and as such creates these choke points because slope capacity may be exceeded. Once slope capacity has been exceeded and combined with a high concentration of beginner/intermediate skiers adding in expert skiers into the same terrain causes high traffic congestion. This in turn ruins the customer experience and is likely to create serious safety issues in a sport where H&S management is already paramount. No responsible operator would create these kinds of choke points or design a skifield with a high risk that the slope capacity will be exceeded.

*Reduction of overall ski area capacity:*

RSSA appreciates that crowd control and managing visitor numbers is a critical component of achieving a good overall user experience. However, we refute the assertion made in the Pure Tūroa application that a reduction from a maximum carrying capacity from 5500 to 4500 is 'slight'. Rather, this represents a 18% reduction in capacity, which is notable and has likely flow on effects:

- 1) Reduced visitors to the Ruapehu District over the winter months, particularly during the busiest part of the season (August to mid-September)
- 2) Increased frustration for visitors that have booked weekend trips, and potentially cannot get up the mountain. For example, the Covid restrictions on numbers, albeit significantly greater, highlighted this frustration.
- 3) Possibly unforeseen increase in visitors to the Whakapapa Ski field causing potential issues on that side of the Mountain, also impinging on visitor experience.
- 4) Reduces accessibility to snow sports in the North Island where most of our population is, and particularly to New Zealanders who want to participate in snow sports, with the majority of overseas visitors going straight to Queenstown.

Note that reducing visitor numbers does not address the issues created by the reduction in lifts that is discussed above. These issues would still exist, with H&S being of particular concern. The reduction in visitor numbers reduces viability while the reduction in ski area and usable lifts negatively impacts the customer experience and their safety.

*Splitting the skifields:*

The skiing community wants the skifield operations to be kept together. This provides important benefits including improved financial stability and flexibility of choice for the customer to ski both sides on one pass. Ruapehu is renowned for its variable weather conditions where quite often Tūroa and Whakapapa will experience variability in conditions between the two fields on any given day, for example one field could be closed for strong winds while the other side is open with light winds. Keeping the fields together means more



of the public benefit from experiencing the mountain, while also making the whole operation more viable.

*Short concession term:*

The application as submitted is somewhat misleading in that it appears to seek approval for a 10-year concession, with what appears to be a 20-year right of renewal. However, the subsequent email clarification (on the Department of Conservation website) appears to confirm that only 10 years is being sought, and presumably Pure Tūroa will need to apply for a fresh concession after 10 years.

That noted, RSSA accepts that any operator of Tūroa Skifield will face significant infrastructure expenditure and will require a reasonable concession duration in order to justify such infrastructure. RSSA remain concerned that the 10-year concession being sought does not provide an adequate time frame for Pure Tūroa to justify and implement any significant investment.

As mentioned earlier, a more logical approach would be to utilise the concessions already granted by restructuring the existing organisation. This approach was put forward by the RSSA at the watershed meeting and received the support of 72% of the creditors. The RAL Liquidation Committee is currently advocating a similar approach for a Creditors Compromise that has the benefit of longer concessions, allowing for a much more feasible investment period.

*Incompatibility with Treaty negotiations:*

Shifting away from a not-for-profit community-based organisation to a private for-profit entity in the midst of Treaty negotiations that encompass the whole mountain, is not only poorly timed but shows a significant lack of respect for the current process and the history behind the creation of the Tongariro National Park. The August 2022 edition of North & South magazine<sup>1</sup> provides critical context for why the shift that is being proposed in the Pure Tūroa concession is not appropriate and not beneficial to securing the best future of the Taonga and all who benefit from it:

“In 1887, as the Crown was rapidly buying up land for settlement on the Central Plateau, Ngāti Tūwharetoa paramount chief Horonuku Te Heuheu Tūkino IV sought to protect the iwi’s most sacred lands. He signed a deed giving the volcanic cones of Tongariro, Ngāuruhoe and Ruapehu to the government to form the country’s first national park, the world’s fourth by DOC’s count...

But in 2013, the Waitangi Tribunal found the story of the gift was a myth. Te Heuheu never intended to give the land to the Crown, the tribunal wrote in its Te Kāhui Maunga report. Instead, he was “inviting the Crown to share their taonga as joint owners and trustees”. The

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<sup>1</sup> North & South Magazine, August 2022, The Fate of Our National Estate

tribunal found the translations between the English and Māori texts of the deed were “fundamentally incompatible”. The iwi claimed the peaks were “their sacred taonga” and “the very essence of their identity” which they would never have given away. The tribunal agreed this was inconceivable.

Two years later, in its report on claims relating to Tongariro National Park, the [Waitangi] tribunal recommended it be taken out of Crown ownership and become jointly owned and managed with iwi.

In 2018, the Supreme Court found DOC’s policies for national parks and conservation wrongly asserted that the treaty clause could be trumped by other parts of the Conservation Act. It said the department was required to take into account the economic interests of iwi when making decisions under the treaty principle of active protection. In essence, if DOC failed to give effect to the principles of te Tiriti o Waitangi in all of its work, it was open to legal challenge from iwi.

“Sustainable use is an essential part of the conservation ethic for the sustenance of tangata whenua as a people; it is critical for cultural survival, identity and knowledge,” the report said.”

It is important to note that Uenuku Iwi from whom the name “Tūroa” originated have already signed a deed of settlement, further highlighting the significance of Treaty negotiations at the current time.

It is imperative that both ski fields continue to benefit Maori and their lands economically, with further delays only creating economic and social pain for all those connected to the region.

The RSSA believe that it is highly likely and desirable that Iwi and the skiing community become the owners/guardians of the ski fields and that their ongoing operation should benefit Iwi and all New Zealanders. RAL is already a public benefit entity that should be restructured to involve Iwi in a Kaitiakitanga role. At the very least the existing structure should be retained until the treaty settlement process has concluded.

*RAL already has concessions to operate Tūroa and has 70 years of experience operating on Ruapehu.*

The PTL proposal will require significant debt forgiveness of the Crown, this is taxpayer money. There is already a ski operator in place that has concessions to operate the Tūroa skifield. RAL has operated for 70 years, and financial modelling shows it will be financially viable if the Crown provides the same debt forgiveness to the existing operator that is being offered to PTL and other private bidders. The RAL Liquidation Committee is pursuing a creditors compromise which provides significantly more certainty to the region as it provides



a solution to both Tūroa and Whakapapa. The creditors at the watershed voted over 71% in support of restructuring RAL.

*Lack of transparency:*

The PTL proposal has redacted the names and experience of key governance and management personnel. The RSSA cannot make an informed opinion on whether PTL have the appropriate level of experience to operate a skifield (note earlier concerns regarding slope capacity limitations of proposed tow line model). This is particularly concerning considering that the three earlier operators of Tūroa (prior to RAL) were all short-lived, as opposed to RAL's 70-year tenure.

The PTL proposal has redacted the financial forecast and key assumptions. The RSSA cannot make an informed opinion on whether PTL have the financial capacity to fund the ski operations long term and whether their business model is financially sustainable. The RSSA due diligence and financial modelling shows that Tūroa will be significantly more financially viable if the skifield is kept together with Whakapapa. The skiing community wants the skifields to remain together and they are the customer.

This is also in line with the key recommendations from the Commerce Commission findings when RAL purchased Tūroa in 2000. Specifically, that both ski fields together were substantially stronger. It must be noted that Tūroa has been in receivership twice prior to the RAL.

[https://comcom.govt.nz/\\_data/assets/pdf\\_file/0017/77210/Decision-410-\\_7.pdf](https://comcom.govt.nz/_data/assets/pdf_file/0017/77210/Decision-410-_7.pdf)

*Removal of the make good provisions:*

The RSSA understands that the PTL concession will exclude the make good provisions. This means at the end of PTL ten-year concession, the cost of removing the infrastructure will fall onto DoC, and therefore falls onto the taxpayer. The RSSA does not think this is appropriate and alternative approaches should be considered to minimise this burden to the taxpayer. For instance, a restructured solvent RAL has lengthy concessions in place to accumulate capital to put aside to fund the future make good provisions, therefore minimising the future burden on the taxpayer.

## Summary

The RSSA are supportive of increased investment and improvements to the field but cannot support lift removals or splitting of the ski fields as proposed by PTL, which is detrimental to the ski field and will negatively impact the general public's enjoyment of the national park. The short length of the concession period does not support increased investment considering the type of capital works required. The ski field proposed by PTL does not support the explicit aim of *Tongariro National Park Management Plan*: "In New Zealand, national parks are areas of publicly-owned land that are preserved in perpetuity for their intrinsic worth and for the benefit, use and enjoyment of the public." This is because the range of people who can actually benefit from the ski field will almost certainly reduce, with the proposed visitor cap reduction and changes to lifts impacting skiable terrain and creating choke points.

A move into private ownership away from a community-based structure directly conflicts with the Treaty negotiations already occurring. This is not helped by a lack of transparency in this process, including PTL's governance and management team, source of investment, and redacted financials.

Tūroa ski field has a bright future ahead of it if we act now, but the PTL proposal is not the appropriate answer on many levels. These ski fields have already served multiple generations and are uniquely important to those families; and we want to see them serve many generations to come.

Nāku



Rob Eller

President

Ruapehu Ski fields Stakeholders Association





## A. Permission Application Number and Name of Applicant **SUB 259**

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	Jason Naumann
Organisation	
Date	08/02/2024

## D. Statement of Support, Neutrality or Opposition

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

## E. Hearing Request

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

## F. Objection or submission

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

I am support of the application as it is consistent with my belief that the Turoa ski area remain viable and open.

My reasons for my objection or submission are:

Personally the Turoa ski field provided me with some of the most incredible childhood memories skiing with my father, brother and friends. I learned a lot on that mountain and cannot wait to bring my own children there. This is all something that every Kiwi kid should be able to enjoy now and moving forward.

From a wider perspective, the ski area provides the local economy with an enormous influx of tourists. This provides employment, attracts investment and encourages people to explore the region.

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

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

I wish for the application to be accepted so that the Turoa ski field can remain open, is a viable entity for Pure Turoa Limited, and continues to provide benefit to Kiwi's and the local economy and community.

## G. Attachments

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

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

### How do I submit my objection or submission?

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto: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 260

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	Brooke Tomoana
Organisation	N/A
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:

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.

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## 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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**From:** [Lawrence Snithson](#)  
**To:** [Mtruapehusubmissions](#)  
**Subject:** Submission for turoa  
**Date:** Thursday, 8 February 2024 4:15:59 pm

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SUB 261

[You don't often get email from **Sec 9(2)(a)**. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Yes please u have my support to have the green light to get pure turoa on the roll I've always been a turoa person and was lucky to work up there last season so it would be a awesome opportunity for turoa the locals and myself for the chance to be up there working and loving everything turoa  
Sent from my iPhone



## A. Permission Application Number and Name of Applicant **SUB 262**

Pure Tūroa Limited109883-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	Brian Pike
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:

### 1. Ski field concessions

The current concessions subsist with Ruapehu Alpine Lifts Ltd (RAL), and while that company continues to trade then the operation of the skifields at Whakapapa and Tūroa. Pure Tūroa Limited (PTL) do not have a concession to operate the Tūroa ski field.

### 2. Business structure

PTL are a for profit company with commitments to pay Income Tax to the government and Dividends to its shareholders (unlike RAL whose profits are reinvested in the business due to its Special Purpose business structure).

### 3. Skifield Capacity

The PTL proposes to reduce the uphill capacity of the lifts.

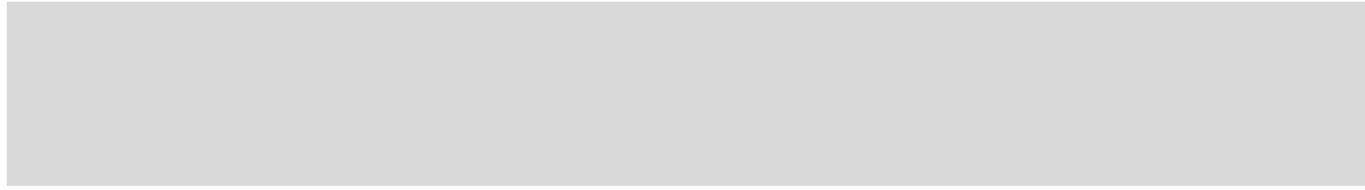
My reasons for my objection or submission are:

1. It is good to see an organisation put their hand up to run the concession for the Tūroa Skifield. However Pure Turoa does not have a concession to do that and it is unlikely to be negotiated in the near future. This is the experience of obtaining / renewing concessions on Mt Ruapehu in the past. Statements from local Iwi who are party to the granting of concessions have indicated that it will be some time before their agreement will be forthcoming for any new concessions. The current concessions subsist with Ruapehu Alpine Lifts Ltd (RAL), and while that company continues to trade then the operation of the ski fields at Whakapapa and Tūroa.
2. There is little transparency in the application by PTL as to its predicted viability.
3. The already reduced capacity of the current lift configuration run by RAL has proved to be inadequate.

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. Careful transition to any new organisation must be made to ensure that the (legal) ability to run the concession is in place.
2. The unavailability of business / governance / financial structure of PTL application needs to be reversed to allow assessment of its capacity to run a successful operation.
3. Evidence that a smaller uphill lift capacity can produce a viable business.



## G. Attachments

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## A. Permission Application Number and Name of Applicant SUB 263

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

Olivia Stewart

Organisation

Bayleys Ruapehu

Date

8th 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:

Pure turoa running the skifield

My reasons for my objection or submission are:

They have a great business model for Turoa and will succeed, also will help the 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.

Na

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## 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 264

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

## C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	SIMON WOODLAND
Organisation	
Date	08/02/2024

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

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## A. Permission Application Number and Name of Applicant **SUB 265**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

## C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter

Organisation

Date

## D. Statement of Support, Neutrality or Opposition

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

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

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

## E. Hearing Request

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

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

## F. Objection or submission

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

All requests related to this application

My reasons for my objection or submission are:

I support this application because I love snowboarding and want my kids to experience that same joy

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](mailto: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 266

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

## C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	Simon Tupman/Susan Adams
Organisation	Private
Date	8 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:

Sec 9(2)(a)

We support the Pure Turoa application in its entirety.

My reasons for my objection or submission are:

Sec 9(2)(a)

we wish to see this application succeed for reasons set out above.

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

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

---

## G. Attachments

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

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

### How do I submit my objection or submission?

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**A. Permission Application Number and Name of Applicant** **SUB 267**

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

Matina Blackley

Organisation

Date

8/02/2024

**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:

Pure turoa running the ski field for 10 years.

My reasons for my objection or submission are:

I support pure turoa in the running of the turoa ski field.

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

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

---

## G. Attachments

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

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

### How do I submit my objection or submission?

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## A. Permission Application Number and Name of Applicant SUB 268

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

Pauline Ingles

Organisation

Date

8 February 2024

## D. Statement of Support, Neutrality or Opposition

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

## E. Hearing Request

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

## F. Objection or submission

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

I fully support the application of Pure Turoa Limited to lease and have a license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. I understand that Pure Turoa Limited's application also includes associated aircraft and filming activities.

My reasons for my objection or submission are:

Sec 9(2)(a) I believe having professional and knowledgeable operators on the mountain will have huge benefits to the town and surrounding areas. I believe the management of Pure Turoa Limited have the knowledge and experience to deliver the performance and experience that is required.

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

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

---

## G. Attachments

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

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

**How do I submit my objection or submission?**



## A. Permission Application Number and Name of Applicant SUB 269

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

## C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	Andrew McLaren
Organisation	Contractor
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:

For new owner/management of Turoa ski area

My reasons for my objection or submission are:

Sec 9(2)(a) I believe that a locally owned and operated ski area will have positive benefits for Ohakune. Many businesses rely on the the ski area operating and have invested large sums of money to attract and accommodate people who wish to visit the District. This is now becoming not only winter environment but a summer one to.. Pure Turoa will be a significant part of the future 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.

I support the application as it has been presented.

---

## 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 270**

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 Carrad
Organisation	
Date	8 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:

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'.

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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 271**

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 Ellis
Organisation	-
Date	2 February 2024

## D. Statement of Support, Neutrality or Opposition

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

## E. Hearing Request

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



## F. Objection or submission

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

Pure Turoa Ltd application to run a private business (ski field) at Turoa, Ruapehu Maunga.

My reasons for my objection or submission are:

I would like to support the application which I understand to be made in good faith by Pure Turoa to operate the ski field known as Turoa.

While the consultation process(es), and Parties who should rightfully be consulted are numerous and complex, this support is given on the understanding that this has been, and is properly being undertaken by Pure Turoa, the crown and its Treaty partners (even if not publicly evidenced in the MBIE approaches, liquidation and receivership processes).

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.

As above, outlines conditions in terms of my understanding of rightful and proper consultation and processes.

---

## 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
No attachm,ents		

**How do I submit my objection or submission?**

## A. Permission Application Number and Name of Applicant SUB 272

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	Hollie Reed
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:

Approving Pure Turoa's application to take over operations.

My reasons for my objection or submission are:

I support Pure Turoa in their venture to take over operations of Turoa Ski Field. They are the right organisation for the job and I know many agree. It's a special place that can only be run by local people with the right knowledge and Pure Turoa are those people. It is not fair to the people who love Turoa and use it yearly if this doesn't go to plan. Pure Turoa will take care of the maunga and have the locals best interests at heart. I know that if this application is successful the operations of Turoa will advance in new directions and be taken care of well. Thank you.

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

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

---

## G. Attachments

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

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

How do I submit my objection or submission?

## A. Permission Application Number and Name of Applicant **SUB 273**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

## C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	Simon Barlow
Organisation	SBPainting
Date	08 Feb 2024

## D. Statement of Support, Neutrality or Opposition

**tick**  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

**tick**  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:

PTL's application to purchase and operate Turoa skifield

PTL's application for a long term concession to operate from DOC

My reasons for my objection or submission are:

I am submitting in favour of all of PTL's applications for purchasing and operating the Turoa skifield.

Pure Turoa has excercised professionalism, patience and cultural sensitivity in the heat of a very divided debate over the future of Mt Ruapehu. Despite considerable challenges and a negative campaign against their proposal, that persists in a populist tone today, PTL has maintained and not deviated from their goals. These goals, by most metrics, clearly define the best net outcome for the Ruapehu region for the long-term continuation of our vital ski season resource.

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

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

I do not wish any parts of PTL's application to be removed or amended.

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## 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 274**

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 Harris

Organisation

Date

8 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 am strongly in support of this application. I have reviewed the submission with an objective view of the stated criteria. My view is that the applicant has thoroughly addressed the requisite consultation and environmental impact aspects, and these are manifest in the development plan. I understand the need for some redaction, and do not perceive that with suspicion.

I am a Life-pass holder (2019), and have therefore been directly privy to the objections raised by the organisation and groups that have expressed an incrementally subjective opposition to the proposal by PTL. The oppositional voices appear to have been increasingly repetitive of some public assertions made by the more vociferous in the groups, rather than from individuals who have allowed themselves to determine some fundamental facts. I do not see their assertions as objectively founded, nor do I see that they are based on the criteria required to be met for the concession.

My reasons for my objection or submission are:

The reason for my strongly supportive submission is based on the view that the concession criteria as stipulated have been met.

The development plan is congruent with the consultation and environmental impact considerations.

The plan balances commercial operational imperatives with well-reasoned developments and alterations, such as reducing footprint.

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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## 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](mailto: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 275**

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	Hamish Carnachan
Organisation	N/A
Date	February 8, 2024

## D. Statement of Support, Neutrality or Opposition

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

## E. Hearing Request

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

## F. Objection or submission

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

I fully support this application by Pure Turoa Ltd.

My reasons for my objection or submission are:

The ski field is vital for the wellbeing and livelihood of the people of the Central Plateau and Ohakune.

Sec 9(2)(a)

I would like the timeframe for the concession to be longer than 10 years if that is the preference of the applicant. This would provide surety to the applicant as well as the business and people in Ohakune (and surrounds) who rely on the ski field operating.

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

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

N/A – I support the application.

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## G. Attachments

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

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





## A. Permission Application Number and Name of Applicant SUB 276

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	Rod McIntyre
Organisation	Life member <sup>Sec 9(2)(a)</sup> of Iwikau Ski Club Inc. (due to time constraints this is <u>not</u> a submission by Iwikau Ski Club Inc.)
Date	8 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:

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
R McIntyre Attachment - objection to PTL concession.docx	Word	7 pages concerning patronage, review of Whakapapa and Turoa weather and snow falls, Turoa lift requirements to suit terrain, skier abilities, skier traffic flows, and safety, and opinion on financial viability and skier commitment of separated Turoa operation. Importance to viability of economies of scale through a single entity for both fields under the same RAL model, i.e. non-profit and non-dividend paying, retaining earnings for poor seasons, and funding R&M and future improvements capex. Lack of long term commitment, inevitable collapse of

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
		Whakapapa skiing effective immediately under separate Turoa operation, with resulting substantial collapses of North Island ski related businesses.

**How do I submit my objection or submission?**

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto: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.

# Attachment - R McIntyre objection to Pure Tūroa Limited concession

8 February 2024

I have regularly skied on Turoa and Whakapapa ski fields since 1971. I am a Life Member [REDACTED] Sec 9(2)(a) [REDACTED] of Iwikau Ski Club Inc<sup>1</sup>. Due to time constraint this is not submitted on behalf of the Club but I'm confident it fits with the sentiments of the members and committee.

## Commercial viability

These factors are pivotal to the commercial viability of the Ruapehu ski fields:

1. Customer commitment to North Island skiing. The vast majority of North Island skiers drive long distances from Auckland, Wellington and elsewhere. This together with erratic weather can for many become untenable unless the skiing is worthwhile. So, reduced ski lift numbers and separate season passes for Turoa and Whakapapa would seriously reduce skiers' commitment to and enthusiasm for North Island skiing.

Meanwhile, South Island ski fields, the Remarkables and Cardrona are making significant new ski lift investments, opening up more terrain. Due to the South Island's better snow, weather and number of ski fields, North Island patronage in preference to Ruapehu is growing noticeably, as is skiing overseas.

The South Island ski fields are patronaged at more than full capacity due to North Island skiers switching to the South Island in response to the uncertainties of skiing continuing on Ruapehu. The result in the South Island is overloaded carparking, very long lift queues, and skier congestion on the slopes. None of this helps environment or safety. Meanwhile there is a whole ski industry and community in the North Island at risk.

2. Snow cover, inclement weather, and changes in climate. The weather patterns vary on each side of the mountain affecting the length of the skiable season of each. Hence diversification across the two ski fields is critical to patronage, personnel and equipment resourcing, and financial viability.
3. Continuity, economies of scale and diversification of resources and capital. Of immediate concern is that there is no apparent solution for Whakapapa so that absent RSSA's appeal success Whakapapa is liable to collapse. This is despite the 2023 season producing a combined RAL operations positive cashflow over \$2 million.

There are considerable financial strengths of diversified resourcing across the combined ski fields. That begins with season pass revenue for skiers. Then there is the flexibility of resource deployment according to snow conditions and season durations.

Ngāti Tūwharetoa reported that "the ski fields requires a significant increase and expansion of operations for there to be commercial viability." PTL's plans to remove three lifts counters that, in addition to decimation of a combined ski field entity.

4. A non-profit and tax free entity (the RAL model). Profits are as variable as snow and weather so that any profits must be retained in full, dividend and tax free, to cover poor years, CAPEX and R&M expenditure, and cross-subsidy between the two fields.

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<sup>1</sup> Iwikau Ski Club Inc. owns three ski properties at Ruapehu; a 32 bunk lodge half way up the Whakapapa Rockgarden slope (recently reclad and reroofed at a cost of \$230,000), a 24 bunk lodge in National Park, and a 12 bunk house in Ohakune.



## Season Passes

A major concern is the prospect of separating the ski fields, as this would put a lot of skiers off committing to the costs of season passes. If anything, with both fields run by one operator that would be more palatable even as season pass prices increase.

In contrast, it would be untenable for many to buy a season pass for just one side of the mountain given the proof that skiing conditions are often very different and unreliable on each, with their seasons tending to be staggered. It certainly would not be viable or justifiable for the vast majority (98%?) to buy season passes for both sides<sup>2</sup>.

## Reducing the number of lifts at Turoa

A challenge of both fields is overcrowding of carparking, slopes, and lift queues, however that overcrowding has not put people off. This benefits the wider ski industry and economy.

### Specific lift comments:

1. Giant chairlift

This is a very popular ski run and is particularly suited to beginner-intermediates. It provides skiing to a quite wide areas of terrain with a number of runs. It gives important diversity to deal with weather and snow conditions elsewhere on the field. Sometimes the weather does not suit skiing higher on the mountain, and insufficient snow cover lower down. It also provides the only direct access to the High Noon café, without which most skiers would have to return to the Wintergarden or base cafés which are far too small for added patronage.

Frankly, I'm very surprised that removal of the Giant chairlift is proposed, and believe it is extremely ill-conceived showing a lack of understanding of Turoa weather and snow conditions, skier traffic on the mountain, and terrain suitability for different skier and snow boarder skills.

My experience on the mountain supports the following in RSSA's email to interested public on 25 January 2025 and available on its website:

*Health and safety concerns should the ski slope capacity be exceeded, dangerously disrupting skier flow (skier traffic congestion/bottle necks due to all skiers being uploaded and offload to limited number of offload and upload points). Slope capacity is an essential component of a properly planned and functioning ski area. To put too many users onto limited terrain is dangerous.*

To put more beginner-intermediate skiers on the High Noon Express territory would be particularly dangerous! I have ample experience witnessing that, through collisions, insufficient skills for the steeper slopes, risks of excessive adventurism leading lower skilled skiers to venture onto steeps on-piste and off-piste, plus not infrequently some seriously icy conditions.

Despite being experienced and accomplished on Turoa ice I got into potential trouble on a patch of sheet ice above one of the off-piste steeps accessible from the High Noon

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<sup>2</sup> Contrary to some perceptions the majority of skiers are not rich, but yes skiing is costly.

Express. Without the skills and maintained sharp ski edges I'd have slid over the steep drop off. It took me about 20 minutes to very carefully side step up to safety.

During one season in the early 1990's Turoa was basically like an ice skating rink. This was especially dangerous on the High Noon T-bar area. I accompanied some athletic but intermediate skiers to the top of the High Noon who were badly frightened by the ice and gradient which their rented skis and skills were not adequate for. I had to coax them down advising on technique to avoid falling and sliding.

On another occasion I spent 30-40 minutes coaxing a beginner skier, a young lady, down an on-piste run below the Movenpick chair lift, because it was far too icy for her and her rented skis. Her friends had lead her there, and disappeared down the slope, leaving her petrified and unable to proceed. I provided her with simple (for experienced!) methods for edging and sidestepping down to safer terrain, which took time.

The point is that the terrain and conditions higher up on the High Noon Express are more severe, and consequential due to altitude, terrain, and less possibility of rescue. It also shows that inexperienced skiers do enter terrain way beyond their skills and some on their own.

These risks lie in the very tempting off-piste skiing renowned on both sides of Turoa beyond the patrolled on-piste limits. There is a trap for less skilled and younger skiers who traversing out beyond on-piste areas can become trapped by terrain and or snow and ice conditions. The off-piste areas on Turoa have numerous bluffs, and terrain trap valleys that can be very difficult to get out of for the less experienced, with added risk of becoming lost.

It should be appreciated that visibility and weather on Ruapehu can go from clear ski to howling gale and next to no visibility in as little as 30 minutes. Hence it is critical that there remain ample tows for intermediates at lower, safer levels, in presence of others and patrollers.

## 2. Wintergarden platter

The Wintergarden is a very important beginner-intermediate tow, as it is on a gentle low pitch slope free of challenges and dangers. It is also very useful when visibility is low because it can still be skied on safely. Again, I'm very surprised and disappointed that removal of it is proposed (I often skied on it in my early years during white-outs and recently with beginners and kids). I think this also very ill-conceived.

## 3. Ngā Wai Heke chairlift

The business case for this lift is less certain. It is closed more often, and serves comparatively little on-piste terrain. Part of that terrain is steep, with bluffs, and prone to ice, because it is lower. It certainly opens up very large areas of fantastic off-piste skiing but that adds operational costs of grooming and safety controls. The removal of this might be disappointing, but we can't have it all! The considerable off-piste ski terrain would still be accessible by experienced skiers which it is suited to, by traversing from the top of the High Noon lift as we have done for decades.

Because it opens up the large areas of off-piste skiing it adds to the risks to less skilled skiers for the same reasons as the High Noon Express. So removal of this lift should be a consideration under which ever operator.

## Historic weather and snow conditions

Ever since the beginning of developing Turoa in the mid 1970's, up to 2023, the variable snow and weather conditions have been well proven.

Weather extremes and dependency on storms for snow fall have long featured, as noted in this 2019 article titled "Celebrating 40 years of skiing Tūroa"<sup>3</sup>:

*The seeds were sown and in 1974 [...] a feasibility study for Tūroa for Swiss company Populaire Investments [...] were bringing out Austrian ski expert Hannes Strolz [...] Ohakune chemist Bruce Wilde [...] recalls how nervous they were. It was late June and there was no snow. Three days before Strolz arrived a "dinkum storm blasted Tūroa".*

For a number of years during the late 1980's and early 1990's there were particularly heavy snowfalls right through the ski seasons, on both Whakapapa and Turoa. The top sections of the roads up the mountain had to be cut through several metres of snow depth. The ski fields or at least Turoa was kept open until mid and even the 30<sup>th</sup> of November for about 3-4 years, and re-opened on Whakapapa and maybe Turoa for restricted skiing for about three weeks during the December-January holiday period.

During the mid 1990's the Grimwade family, who operated Turoa, also experienced the vulnerability to detrimental weather on Turoa, as shown in this 2022 article "The Ruapehu Saga"<sup>4</sup>:

*Turoa went through three bad seasons in four. Both 1995 and 1996 were badly affected by Ruapehu's most recent eruptions, and 1998 was an even worse snow season than this one with the season lasting a mere six weeks.*

That "worse snow season" was in 2000 when RAL acquired Turoa. So snow deficits are a periodic feature, with adequate to good snow falls during the years in between.

By the time that the Grimwade's exited, the ski field assets were run down and little new investment had been made during their tenure. I understand that the Grimwade venture became insolvent.

It is normal for the snow cover on both fields to gradually build throughout the season, with heavy snow falls possible at any time.

Turoa was blessed with above average snowfall during the 2023 winter, and Whakapapa had about average snow. For the past few decades adequate snow on Whakapapa has been weeks later than at Turoa which typically has a longer season, starting earlier and lasting later, until Labour weekend (or after).

Hence the importance of risk and cost diversification of access to both sides of the mountain, both for skiers with their season pass, and the ski fields operator with the flexibility of deploying resources where and when needed.

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<sup>3</sup> <https://www.nzherald.co.nz/rotorua-daily-post/news/celebrating-40-years-of-skiing-turoa/VMV2KZB3K46GUETWRDD4RON2KA/>

<sup>4</sup> <https://www.sportsfreak.co.nz/the-ruapehu-saga/>

## **Comparison of Turoa and Whakapapa conditions**

From my over 50 years of skiing almost every year on Mt Ruapehu, equally on Turoa and Whakapapa, I have witnessed that significant snow falls are dependent on southerly storms. Daytime temperatures for much of the season when there are no storms from southerly quarters are not often low enough for snowfall.

The southerly quarter storms bringing snow are sporadic and can occur anytime from May until late in the season, not uncommonly mid-October when in many years there have been heavy snow falls of 30 to 60cm. This pattern continues, albeit with less snow at lower levels, requiring snow making which successfully enables skiing.

Turoa generally receives more snow and for a longer season than Whakapapa due to its more southerly aspect. However, it is also more prone than Whakapapa to bad weather with days of restricted visibility of cloud and mist, high winds, and snow or rain. It is often closed due to the harsh weather it receives. Even when it is open the skiing is often in poor to abysmal weather – wind which can lower temperatures to below -20 degrees C, low visibility, and driving rain or snow.

Even although Turoa often receives more snow, when warmer weather comes from northern aspects it can become much more icy than Whakapapa when southerlies re-freeze melted snow. Conversely, on northerly exposed Whakapapa the snow becomes slushy with warmer temperatures in October.

Due to the different timing of snow and weather conditions, many of us start the season skiing at Turoa, then ski at Whakapapa for several months, and then from late September tend to ski at Turoa.

These weather conditions have always existing, albeit the climate is warming being at the tail end of the last ice age, with the added effects of AGW.

Despite the challenges the skiing on both Whakapapa and Turoa is mostly good to fantastic. The terrain on both sides is varied, with gentle-moderate slopes, and for experienced skiers there is ample terrain with more undulating and challenging slopes and wide plateaus. Indeed the mix of nice, tamer and steeper slopes, on and off-piste, on good days is as good as any ski field globally, albeit on a smaller scale.

The two fields feature similarities but also considerable differences in terrain and snow conditions. The terrain on Whakapapa is more varied and aside from beginner-intermediate areas is more challenging due to more undulations including exciting steeps! Turoa's terrain is comparatively gentler and more wide open, suiting all abilities, yet provides great off-piste terrain and snow for experienced skiers. Its downsides however are frequent weather extremes for days on end and tendency to be particularly icy<sup>5</sup>.

The result is that skiing on Ruapehu is much more attractive under combined operation accessible by a common season pass, and more financially sound as the 2023 season appears to have shown.

## **Continuity of North Island skiing**

Whakapapa appears to remain unsolved with withdrawal of an earlier bidder. It will not be permissible to run the Whakapapa operation in 2024 as things stand with a potential transfer of

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<sup>5</sup> South Island snow is far superior to Turoa ice.

Turoa to a separate operator, PTL. This must mean the collapse of skiing at Whakapapa, resulting in breakdown of the North Island skiing and related businesses and employment by perhaps 60-70%, with immediate and future flow on business failures.

As stated by Ngāti Tūwharetoa in its announcement that it has taken its offer for Whakapapa off the table (and that it will take legal action if the Turoa sale isn't halted):

*"We have undertaken commercial and legal due diligence with the support of KPMG and Bell Gully which has demonstrated that the ability for any operator to continue operating the ski fields requires a significant increase and expansion of operations for there to be commercial viability."*

Based on that, scale is necessary for the commercial viability of the ski fields. Sale or lease of Turoa, with reduction in lifts, and likely closure of Whakapapa would give the opposite effect.

## **Finally**

I do believe that a longer term commitment than the ten years proposed for Turoa is necessary for both investment commitment to the ski field operation and also certainty for the ski related businesses and employment.

Should PTL find that it cannot achieve commercially acceptable returns it should be expected that for at least the last few years of their lease, or even five years, it might curtail capex and R&M leaving the resort in the same condition as that of the Grimwade enterprise.

In my opinion it is highly doubtful that either ski field can survive long under separate operators. I think that Whakapapa on its own would be the most vulnerable owing to its shorter season (later start and earlier finish). Yet it is Whakapapa which has the highest funds invested and value of assets, patronage and support of ski related businesses.



## PURE TUROA LIMITED (PTL) NZ Companies Office register

### Summary from Company Extract:

- Company number: 8650346
- Incorporated: 13 March 2023
- Annual Return Filing Month: June [none filed for June 2023]
- Ultimate holding company: none
- Total Number of Shares: 100
- Directors & Shareholders: Messrs Hickman and Robertson

### Observations:

With just 100 issued shares it is probable that PTL has very little capital actually contributed by shareholders. Typically 100 shares suggests a paid up capital of just \$100.

There is no Ultimate holding company so that PTL is a standalone company and not a subsidiary of another company which typically is larger with greater capital.

PTL having just two directors is consistent with this being a very small company probably lacking *committed* resources.

The Constitution of Pure Turoa Limited in the Companies Office register is extremely basic comprising less than one page, with just basic formalities, and nothing relating to current or future funding, management, and operating other than in its Application prepared with advisors.

No website or business premises and the likes are given in PTL's Application.

This shows preliminary endeavours by the shareholders, yet to put a credible amount of their own "money in the game."

Therefore PTL's application to lease, absent evidenced substantive capital input necessary to run a very costly ski field, an inherently risky business, which must be expected to run at losses in some years, on the information available, does not look complete enough to warrant jeopardising Whakapapa immediately and all North Island skiing within ten years..

It certainly cannot be considered to be a credible saviour of North Island ski related businesses, skiers, and Iwi interests. It leaves one half of Mt Ruapehu skiing without solution for survival.

\*\*\*\*\*

## A. Permission Application Number and Name of Applicant **SUB 277**

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	Lachlan Coleman
Organisation	N/A
Date	8/02/2024

## 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:

- Removal of lifts and other assets
- Lack of transparency of financials and directors/board
- Sale of community funded assets into a private enterprise with little recognition of the community funding
- Long term viability
- Upcoming treaty settlement
- Division of the community

My reasons for my objection or submission are:

The proposed plan to remove ski lifts and consolidate ski terrain at Turoa overlooks essential ski area design principles, posing significant risks to both the safety and enjoyment of skiers by leading to increased slope congestion. Such changes threaten to undermine the intrinsic value and appeal of Turoa, not just for the skiers but also for the surrounding communities of Ohakune and Raetihi, which are deeply interconnected with the ski area's well-being and prosperity. By concentrating skiers into a narrower range of terrain, the experience becomes less enjoyable and more hazardous, potentially deterring visitors and impacting the local economy. Additionally, this consolidation is likely to push more skiers towards Whakapapa, further straining its capacity and exacerbating congestion issues. This approach not only detracts from the quality of the skiing experience but also risks the long-term sustainability and attractiveness of both ski areas.

RAL's financial difficulties can be attributed to a series of poor decisions made by its management and by government policies over the years, leading to decreased usage and a perilous tilt towards high-debt, high-risk management strategies. (even though last year RAL made money with a ~30% downturn in ski days) The acquisition of community-funded assets and the government's 25% ownership stake in these ventures underscore the imperative to maintain transparency and accountability to the stakeholders and shareholders—the people of New Zealand. This ownership structure should obligate Pure Turoa to keep the public informed and engaged in decision-making processes, ensuring that the management and future direction of ski area operations align with public interest and sustainable practices. The current proposal's lack of detail on the management team's expertise in ski area operations and their financial strategies exacerbates concerns, making it difficult for stakeholders to endorse. This opacity necessitates a concerted opposition to safeguard the mountain's and the communities' welfare, emphasizing the need for a management approach that is not only transparent but also inclusive of the diverse interests and voices within New Zealand.

The Ngā Wai Heke lift at Turoa serves as a critical safety feature and a distinctive landmark, playing a pivotal role in safeguarding skiers and enhancing their experience on the mountain. Its presence has dramatically reduced the risks associated with navigating the challenging terrain of the ski area, particularly when compared to the era of the High Flyer lift when from memory deaths occurred. Prior to the installation of Ngā Wai Heke, skiers faced the perilous choice of crossing a steep valley to maintain elevation and minimize walking time or risk getting lost in the complex terrain, situations that tragically led to fatalities. The introduction of the Ngā Wai Heke lift eliminated the need for such hazardous crossings by providing a safe and efficient route from the end of the Triangle run, significantly reducing the likelihood of accidents and enhancing overall safety.

Moreover, Ngā Wai Heke acts as a vital orientation point for those who may find themselves disoriented or lost, preventing skiers from descending too low into areas where a strenuous walk back would be necessary. This lift not only contributes to the physical safety of skiers but also ensures a smoother, more enjoyable skiing experience by maintaining easy access to key parts of the ski area.

It's important to acknowledge that the establishment of the Ngā Wai Heke lift would have been preceded by an environmental impact study, which deemed its location acceptable. Any decision to remove this lift would not only reverse its safety benefits but also likely have significant environmental repercussions. Additionally, the operational reliability of Ngā Wai Heke has proven to be a crucial factor in attracting visitors, as evidenced during the season when the High Noon Express was out of service. For many, including myself, it was the availability of the Ngā Wai Heke lift that continued to draw us to Turoa, underscoring its indispensable role in the ski area's appeal and functionality.



The proposed changes to the pass structure could have a detrimental impact on Ohakune and Turoa, particularly favoring the larger ski field in terms of pass sales. This shift risks undermining the unique value and contributions of smaller, community-oriented organizations, including ski clubs and other not-for-profit entities in Ohakune, many of which are managed by individuals holding life passes. These life passes for some people are the only drawcard that they have to continue to be part of the community of volunteers and are integral to the sustainability and vitality of these organizations. The potential discontinuation of life passes under a new management model for Turoa threatens to disrupt the management and operation of these crucial community organizations. Given that the holders of life passes typically use them sparingly, according to available data, the decision to invalidate these passes overlooks the significant, albeit less quantifiable, contributions these individuals make to the community. Such a change could lead to a decline in the management quality of these organizations or prompt their leaders to leave, ultimately eroding the social and recreational infrastructure that enriches Ohakune and supports Turoa. This approach not only neglects the historical and ongoing investments of these community members but also fails to recognize their role in fostering a vibrant local ski culture and economy.

The sale of community-funded assets to a private entity for profit raises significant moral concerns and necessitates a cautious approach, especially when alternative proposals are available. These assets, developed and supported by the community's investments, are not just physical properties but represent the collective efforts, hopes, and contributions of individuals who envisioned them as resources for public enjoyment and benefit. Utilizing these assets and the surrounding national park for profit-driven motives casts doubt among skiers and the broader community about whether the revenue generated will be reinvested in the community that originally funded these developments. This concern is particularly acute in contexts where the community has historically played a central role in financing and supporting ski field operations, expecting that their contributions would enhance local infrastructure, promote recreational opportunities, and foster economic growth. The prospect of diverting the benefits of these investments to private gains undermines the trust and spirit of community partnership, making it imperative to scrutinize such transactions carefully to ensure they align with the interests and well-being of the community and maintain the integrity of public resources.

Furthermore, the proposal's short-term concession period raises doubts about the willingness to invest in essential ski area infrastructure, mirroring concerns of potential exploitation similar to past failures under for-profit management models.

Critical too is the consideration of iwi interests amidst ongoing Treaty of Waitangi settlement processes for Tongariro National Park. Privatizing parts of Ruapehu before these settlements are concluded disregards the importance of these negotiations and the rights of iwi to be involved in decisions affecting their ancestral lands.

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.

**Opposition to Privatization and Support for Non-Profit Management:** I stand against privatizing community-funded assets, suggesting Pure Turoa (for profit), could manage the ski field Turoa (not for profit) to build trust. This setup, pending treaty settlements, could later transition to a formal concession with Pure Turoa, while the Crown maintains oversight for continuity.

**Community Impact Passes for Committee Members and volunteers:** if life passes are to be invalidated Propose exploring passes for those in key roles within local non-profits supporting Turoa and its community, acknowledging their critical, often volunteer, contributions across sectors. This support aims to recognize and encourage their invaluable service, enhancing community bonds.

**Transparency Requirements for Pure Turoa:** Demand that Pure Turoa publicly shares its financials and board details before any concession is granted allowing public feedback, ensuring accountability and transparency to its stakeholders and shareholders (the New Zealand people).

**Retaining the Ngā Wai Heke Lift:** Stress the importance of keeping the Ngā Wai Heke lift for its vital role in skier safety and orientation, essential for the ski field's appeal and functionality. Its continued presence is crucial.

Push for longer concession timeframe to allow for significant investment as required.

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## 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 278

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

Susan Delaney

Organisation

Date

8 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 am strongly in support of this application. I have reviewed the submission with an objective view of the stated criteria. My view is that the applicant has thoroughly addressed the requisite consultation and environmental impact aspects. I understand the need for some redaction, and do not perceive that with suspicion.

I am a Life-pass holder (2019), and have therefore been directly privy to the objections raised by the organisation and groups that have expressed an incrementally subjective opposition to the proposal by PTL. The oppositional voices appear to have been increasingly repetitive of some public assertions made by the more vociferous in the groups, rather than from individuals who have allowed themselves to determine some fundamental facts. I do not see their assertions as objectively founded, nor do I see that they are based on the criteria required to be met for the concession.

My reasons for my objection or submission are:

The reason for my strongly supportive submission is based on the view that the concession criteria as stipulated have been met. It

The development plan is congruent with the consultation and environmental impact considerations.

The plan balances commercial operational imperatives with well-reasoned developments and alterations, such as reducing footprint.

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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## **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 279**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

## C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	
Organisation	
Date	8 February 2024

## D. Statement of Support, Neutrality or Opposition

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

## E. Hearing Request

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

## F. Objection or submission

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

The reduction of the number of Lifts.

There has been insufficient disclosure of information to assess whether the applicant is financially and professional sound to run Turoa.

The short term of the Concession applied for.

Privatisation of the skifield (out of community ownership).

Conflict with future TNP treaty claims.

My reasons for my objection or submission are:

As a user of Turoa for more than 40 years **Sec 9(2)(a)** I do not agree with the privatisation of Turoa to Pure Turoa Ltd.

The proposal to remove lifts does not make sense – and this what has happened at Whakapapa when the Waterfall quad chair was removed (and thereby reducing the skiable area). Everyone is funnelled into the middle of the field and this will result in more congestion & eventually to a standstill.

There has been extremely limited information available regarding Pure Turoa Ltd, their financial, capacity, and expertise in running this skifield – and why they have been selected over others. I support the not for profit business model (under new management). Why has Pure Turoa Ltd been selected. My understanding is that they were bought in by the administrators to advise – and then (by having insider knowledge) became the preferred bidders. This appears underhanded and a conflict of interest.

A ten year concession (if approved) is insufficient to enable a new owner to invest in infrastructure and improve the mountain. There is too much uncertainty to enable to smooth transition and a high degree of public risk.

Privatisation of one skifield is detrimental to the current users, and will result in significant price increases. The not for profit ownership model worked well for many decades, and with (willing) community investment and new management, it can correct itself and continue to flourish. Rather than a select few profiting from Turoa – the community should be given the opportunity to invest and enjoy Turoa in perpetuity.

Iwi have expressed their desire to be meaningfully engaged and to be part of a future ownership model. The consultation to date has been rushed and solutions rammed-through without adequate iwi input. There is an outstanding Treaty Claim which should be resolved before any discussion of privatisation takes place.

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 the privatisation of the RAL ski area.

The crown should meaningfully engage with local iwi and the wider community to run the ski field to best industry practise and to allow sufficient time for TNP claims to be settled.

Reject the application which will have a detrimental effect on the Turoa skifield, it's users, local iwi, and the surrounding community. Privatising a single skifield with a ten year concession is a poor outcome for all.





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## 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 280**

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	Conor Rutherford
Organisation	
Date	07/02/2024

## 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 concession for Pure Turoa Ltd to continue recreational ski operations with the existing infrastructure on Mt Ruapehu.

My reasons for my objection or submission are:

Myself and many others believe that Pure Turoa Ltd. is the only viable option for the future of Turoa ski area moving forward. There are countless jobs, lifestyles and culture up in the air on the mountain itself and throughout the wider region. Pure Turoa has shown that they are putting their name forward for the continued operation of the ski area with respect to the Iwi, cultural significance of the Maunga and Whenua, the many people who this decision will affect, the history behind where we are today and the unique environment that we have all been so blessed to enjoy. Their values as a company align with those of DOC and the people of New Zealand, focusing on a smaller environmental footprint with replacing older infrastructure with more efficient technology, lowering maximum capacity for guests to reduce strain on infrastructure and environment, reducing emissions and traffic by offering more sustainable and efficient transport, grooming and snowmaking options, also looking at how the operations can be viable for future generations by taking the Turoa experience through winter and into a year round operation. Turoa has an undeniably huge footprint on the history of New Zealand's recreational alpine experiences, and is far too important for us to leave behind.

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

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

## G. Attachments

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

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

**A. Permission Application Number and Name of Applicant** **SUB 281**

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	Frances Herriman-Holmes
Organisation	N/A
Date	08/02/2024

**D. Statement of Support, Neutrality or Opposition**

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

**E. Hearing Request**

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

## F. Objection or submission

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

I support Pure Turoa Ltd to run all aspects of the Turoa ski fields at Mt Ruapehu.  
I support Pure Turos Ltd to manage the environmental and cultural impact of a Ski field along with DoC and local Iwi Authority.

My reasons for my objection or submission are:

Ruapehu is the only viable North Island ski area and it is wonderful to have access to this magnificent maunga for recreational pursuits.  
It is a primary source of income and livelihood for the local business both directly and indirectly involved with activities on the maunga.

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 DoC and local Iwi Authorities to work collaboratively with Pure Turoa Ltd to assess and considerstely manage any environmental and cultural implications impacted by running a ski field (and related activities) on Mount Ruapehu.

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## 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 282**

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	Karen Maria Giron Roncal
Organisation	
Date	08/02/0224

## 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:

PTL's application to maintain and operate Tūroa Ski Area on Mount Ruapehu.

My reasons for my objection or submission are:

PTL's mission of a culturally aligned, environmentally sustainable and commercially viable Tūroa for years to come is aligned with my values. The livelihood of many of my friends and their families largely and sometimes solely, depends on the sustainable and profitable operation of the Turoa ski field.

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?

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto: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 283

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	Gus Falvey
Organisation	
Date	08/02/2024

## D. Statement of Support, Neutrality or Opposition

Yes 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

(This one) 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.

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## G. Attachments

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## A. Permission Application Number and Name of Applicant **SUB 284**

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	Ariana Andrews
Organisation	
Date	08/02/2024

## D. Statement of Support, Neutrality or Opposition

Yes 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

(This one) 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.

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## 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](mailto: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 285**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

## C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter

Organisation

Date

## D. Statement of Support, Neutrality or Opposition

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

## E. Hearing Request

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



## F. Objection or submission

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

1. Insufficient disclosure of important information e.g. financial projections and key personnel.
2. Proposed reduction in lifts and skier capacity, which impacts employment opportunities and economic benefits.
3. The short term of the concession.
4. The discounting of alternative possibilities.
5. The Tongariro National Park treaty claims.

My reasons for my submission are:

I have a strong personal and whānau connections to the mountain and am submitting on behalf of future generations of skiers and snowboarders.

1. Experience tells us that a standalone field at Tūroa is not financially viable. The applicants have not released details around their financial projections nor the key personnel who will be involved in running the proposed skifield. We therefore cannot be confident that this operation will be any different to those of the past and financial demise will follow.
2. A number of lifts are proposed to be removed at DOC's expense. This will reduce skier number therefore reduce employment opportunities both onfield and in the surrounding area. Coupled with the demise of Whakapapa, this is at direct odds with much of the application. In additional, the skiable terrain will be limited therefore compromising the "customer experience".
3. The proposed 10 year concession timeframe is too short and will further comprise the financial viability of the skifield operation.
4. RAL hit the wall due a combination of poor governance, poor management and a corporate mentality on the board that took it away from a previously-successful stewardship. But since they do have a long-term concession for both Tūroa and Whakapapa a rejuvenated RAL is the way forward for snowsports in the Tongariro National P
5. It would be inappropriate to grant a concession before the Tongariro National Park treaty claim is heard and settled.

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:

- a) **Reject the concession application.**
- b) Allow the exiting concession holder (RAL), under new management and governance, to run the Turoa and Whakapapa ski fields jointly following good faith negotiations with the Crown and iwi.
- c) Allow the Tongariro National Park treaty claim to run its natural course.

## G. Attachments

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

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



## A. Permission Application Number and Name of Applicant SUB 286

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	Dave Johns
Organisation	Self
Date	8 February 2024

## D. Statement of Support, Neutrality or Opposition

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

## E. Hearing Request

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

## F. Objection or submission

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

The proposal by Pure Turoa Limited to acquire a ten year lease and licence to operate the Turoa Ski Field on Mt Ruapehu.

My reasons for my objection or submission are:

Sec 9(2)(a)

Sec 9(2)(a)

Yes, I have been around a while, watched with interest the happenings over the years.

We as a town worked very hard to encourage growth in the community, creating jobs, and new businesses to support the new ski field, accommodation, restaurants, fast food outlets, ski hire and sales, both on and off the mountain, the ski field has encouraged the development of subdivisions in the town and surrounds, accommodating new people and not just to ski, but to enjoy the Maunga, etc.

Millions have been spent in support of the ski field, particularly in the area that used to be known as the Waimarino, the Govt stepped in to support it as well.

I'm in support of the continuance of the ski field as the alternative is daunting, demolition...!

Sec 9(2)(a)

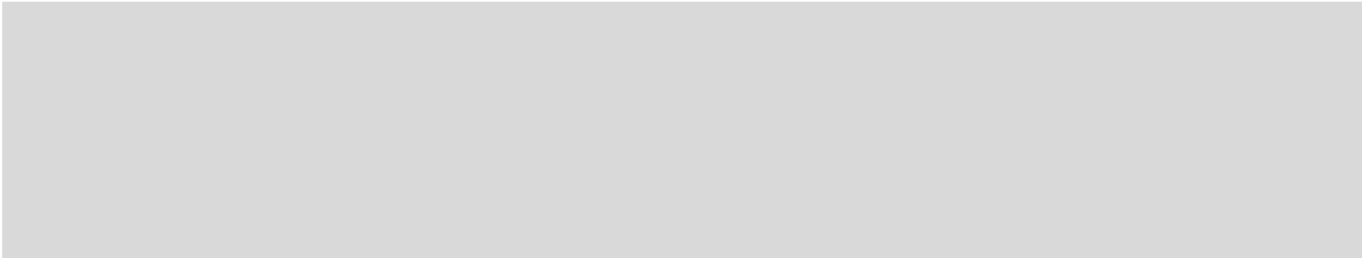
I know what is involved to pull it apart, not an option in my opinion..!

Good luck and, "in the spirit of co-operation by all" approve this application please.

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
N/A		

### How do I submit my objection or submission?

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## A. Permission Application Number and Name of Applicant SUB 287

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

## C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	Scott Rabone
Organisation	Private individual
Date	8 February 2024

## D. Statement of Support, Neutrality or Opposition

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

## E. Hearing Request

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

## F. Objection or submission

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

I generally support the submission but believe it should allow for upgrade or replacement of the Nga Wai Heke with a new chairlift in the same location.

My reasons for my objection or submission are:

The Nga Wai Heke chair opens up a large area of potential skiing terrain and allows people to enjoy and appreciate the glacier area. There is no need to make its removal a condition of the license

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.

As above, removal of the Nga Wai Heke chairlift should not be a condition of the license. I.e. If PTL wish to install a chairlift in this location or upgrade the existing this should be 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 288**

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

Susie Hancorn

Organisation

Date

8 Feb 2024

## D. Statement of Support

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. Submission

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

I support the application of Pure Turoa to operate Turoa ski area.

My reasons for my submission are:

Ohakune urgently needs a functional company with a robust future plan operating Turoa ski area – without this many local businesses will not survive and the town will go into significant decline. The wider region also benefits from a thriving town on the south side of Tongariro National Park.

Pure Turoa have emerged as the only contender for operating Turoa. They have been diligent in consultation and through this Ngati Rangī have indicated their support, subject to conditions. These conditions are chiefly environmental and focus on the reduction of ski field footprint. This is directly in line with the Department of Conservation’s stated purpose to ensure that the land is well so the people can thrive.

The future of Ohakune is at stake and I believe granting Pure Turoa a concession to operate will pull economic, environmental and Iwi interests together in a way we have not previously seen. In this regard, RAL have been a long-running, dysfunctional, unmitigated disaster. Now a new approach is possible and Pure Turoa is it.

On behalf of the families and businesses who have invested their lives in this unique and utterly beautiful place, I urge you to help ensure there are no further delays in this process. I really can’t stress enough how important this decision is. Thank you.

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.

A new entity (Pure Turoa) to come into the arena forthwith, focussing on a year round, environmentally and culturally sensitive mountain operation that provides a sustainable, harmonious future for Turoa, Ngati Rangī, and the residents and businesses of Ohakune/Raetihi, and the wider Ruapehu region.

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## 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 289**

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	Tianling Lu
Organisation	
Date	08 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. 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.

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 290**

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	Dan Lowery
Organisation	
Date	08.02.24

## 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:

MBIE/PTL's previous refusal to fairly engage and be transparent with the local iwi & invested public.  
Privatisation prior to negotiation (let alone settlement) of current Tongariro National Park treaty claim(s).  
Lack of disclosure of important information to help inform interested parties to make educated decisions.  
Proposed reduction in lifts servicing Turoa.  
Relatively short term of the concession applied for.

My reasons for my objection or submission are:

By default, the incumbent Ruapehu Alpine Lifts non-profit entity has been established to preserve and protect in perpetuity "the benefit, use and enjoyment of the parks by the people" reflected by RAL's existing commitment to care for people and place with the 'At Our Peak / Kei tō tātou tihi' framework.

Privatisation of one field under Pure Turoa's 10-year concession, renewable at 5-years is a massive departure from RAL's current licence to operate Turoa until 2042 (with rights to extend a further 25-years). In my mind, whilst this was the only option available to PTL, this short-sightedness threatens the viability of both ski fields, and poses the real commercial risk of PTL asset stripping Turoa for profit, with minimal incentive for capital investment over this period (\$32 million has been earmarked), noting this existing infrastructure was erected for the enjoyment of all, and for the next generation, with no expectation of a commercial return.

Whole sections of Pure Turoa Limited's application had been plagiarised wholesale from RAL's existing concession, suggesting a lack of professional consideration or interrogation.

Lift removal seems ill-considered, with zero redundancy in the event of the proposed Movenpick Express (with mid-station) breaking down. All skiers will be concentrated into relatively challenging, narrow terrain, essentially mixing expert, intermediate and beginner skiers onto limited slopes that will be nearing capacity.

Keeping both ski-fields together under one umbrella ensures long-term financial viability and secures these valuable community owned assets for the employment and future enjoyment of our Maunga - 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 PTL's application, based on the above, noting that the privatisation of Turoa, where there is still no viable solution for Whakapapa is an unacceptable risk to the region.

Should PTL's application be approved, the Crown should consider ceding their 25% ownership to local iwi to help resolve any outstanding Tongariro National Party Treaty Claims.

PTL's concession and potential renewal should be dependent on key performance indicators, ensuring the mountain remains accessible for all New Zealander's.

---

## 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 291**

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	Darren Grbic
Organisation	RAL life pass holder
Date	07/02/2024

## 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 removal of lifts.  
The prescribed length of the concession to operate within the national park.  
The decrease in skier numbers that can access the ski area.

My reasons for my objection or submission are:

There will be LESS opportunity to access skiable terrain on days when the upper lifts will not open due to avalanche risk; adverse weather conditions through the removal of the Giant and Nga Wai Heke chairs. The lack of operation of the latter has been primarily due to economic pressure which is understandable. However, once this is removed there is NO opportunity for reinstatement even if there are NO economic concerns.

The removal of the platter @ the midfield area will minimise learner facilities and graduated access to the upper mountain.

The largest skier populations in NZ reside in between both the Auckland and Wellington regions and a lower cap on skier numbers will limit access on certain days (weekends/public holidays). The last two years should be viewed as an anomaly in terms of lower skier numbers due to both localised weather conditions and snow user uncertainty related to receivership.

The current concession to operate with the national park far exceeds that proposed by Pure Turoa Ltd.

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

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

No lift removal.  
Current concessions remain to ensure enduring viability and access of ski area operation.

---

## 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](mailto: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 292**

Pure Tūroa Limited 109883-SKI

## B. **Name of Proposed Activity and Location(s)**

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

## C.2 **Your name**

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

Printed name of submitter or person authorised on behalf of submitter	Wayne Marshall
Organisation	
Date	2/9/2024

## 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'.*

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

### **How do I submit my objection or submission?**

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## A. Permission Application Number and Name of Applicant **SUB 293**

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	Alison Chamley
Organisation	
Date	8 February

## 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:

Future of the rohe and towns. Pathways for tamariki and future work it will bring. Economical development and growth to the rohe.

My reasons for my objection or submission are:

Believe in Pure Tūroa and the tangata that support and bring their experience to create a ski area again.

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

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

---

## G. Attachments

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

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

### How do I submit my objection or submission?

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## A. Permission Application Number and Name of Applicant **SUB 294**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

## C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter

Andrew (Andy) Bogacki

Organisation

Date

8<sup>th</sup> February 2024

## D. Statement of Support, Neutrality or Opposition

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

## E. Hearing Request

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

## F. Objection or submission

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

The entire application

My reasons for my objection or submission are:

I support the application because I believe that the applicant is the only currently interested party that has a business model capable of operating Turoa skifield.

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](mailto: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 295**

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	Tricia Eves
Organisation	Eves Construction Ltd
Date	08/02/2024

## 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:

Lease and license for Pure Turoa to operate Tūroa Ski Area on Mount Ruapehu in  
Tongariro National Park .

My reasons for my objection or submission are:

Pure Turoa are the only Viable option to run a successful operation on the mountain.

The local economy of Ohakune needs the mountain to survive, the business both retail & trade rely on the people that come to visit the Munga . It brings people to our town and surrounding communities which keeps our economy going.

It also brings professional people, which we need , it is hard now to find teachers & doctors , which will be near impossible if we don't have a mountain with skiing.

The Town has struggled the last few years with uncertainty, Pure Turoa will bring positivity for everyone.

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

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

---

## G. Attachments

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

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

**How do I submit my objection or submission?**

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**From:** [Lisa Bamberger](#)  
**To:** [Mtruapehusubmissions](#)  
**Subject:** Submission against the application to lease and the license to operate under a new concession the Ski area known as Turoa on Mt Ruapehu  
**Date:** Thursday, 8 February 2024 8:25:48 pm  
**Attachments:** [L Bamberger Objection to turoa-submission.pdf](#)

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You don't often get email from [lisa@bamberger.nz](mailto:lisa@bamberger.nz). [Learn why this is important](#)

I attach my submission.

I repeat my objection is primarily on grounds that this is a rushed, botched, process. The apparent lack of transparent consultation with Tanaga tawhenua will result in further insult to the maunga's mana. These resources, which belong to all New Zealanders are being given to just a few with absolutely no guarantee of future good stewardship or conservation.

As the Department of Conservation this must be your priority. Do not bow down to the Ministry of Business, Innovation and Employment. Best business practice innovates, it does not rape and pillage, as MINBIE wishes to do.

We must wait until the final settlement of the treaty claims are resolved. Better yet if you are hell bent on removing RAL, then please consider awarding our mountain and its ski infrastructure assets to an Iwi partnership with crown appointed expert advisors.  
Sincerely

Lisa Bamberger

## A. Permission Application Number and Name of Applicant

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

## C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	Lisa Bamberger
Organisation	Individual
Date	08/02/2024

## 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 greatest concern is the compressed consultation period and lack of evidence ALL iwi groups have been consulted. This should not be awarded prior to full and final outcome of the Waitangi Tribunal claims process.

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.

I agree with all the points made here but this is the most important to me.....

**Iwi engagement has been completely redacted.**

I am very unhappy that our natural guardians of the land are not being allowed the last word on how our precious mountain is going to be desecrated for the profit of a very few.

**I repeat my objection is primarily on grounds that this is a rushed, botched, process. The apparent lack of transparent consultation with Tanaga tawhenua will result in further insult to the maunga's mana. These resources, which belong to all New Zealanders are being "given" to a commercial interest to line the pockets of a select few, just a few with absolutely no guarantee of future good stewardship or conservation.**

**As the Department of Conservation this must be your priority. Do not bow down to the Ministry of Business, Innovation and Employment. Best business practice innovates, it does not rape and pillage, as MINBIE wishes to do.**

**We must wait until the final settlement of the treaty claims are resolved. Better yet if you are hell bent on removing RAL, then please consider awarding our mountain and its ski infrastructure assets to an Iwi partnership with crown appointed expert advisors.**

Sincerely

**Lisa Bamberger**

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 clear (not lip service) 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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## G. Attachments

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

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

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## A. Permission Application Number and Name of Applicant SUB 297

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

## C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter

Organisation

Date

## D. Statement of Support, Neutrality or Opposition

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

## E. Hearing Request

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

## F. Objection or submission

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

Lack of consultation  
Separation of the ski field pass system  
Reduction in lifts  
Removal or asset and no replacement  
No mid mountain base  
Not enough disclosure of their finance set up  
Reducing the amount of people being able to use the park  
Getting the mountain for free at the cost of our taxpayer money

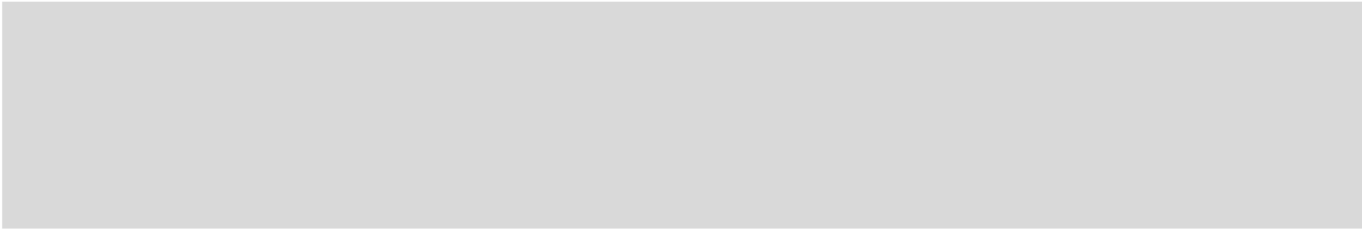
My reasons for my objection or submission are:

I do not believe a rush to privatise is the answer, the taxpayer, owns RAL. So not only Doc should make the call. In a sense we own the concessions.  
I want both ski areas under one umbrella because this mountain is so unpracticable and it makes easier choice to have both sides under the same administration.  
It should saty a not-for-profit  
The corporate solution, as proposed goes in exactly the opposite direction.  
The proposals to remove lifts is nonsense for the future, if this area wants to gain in visitors it needs to offer more choices do not reduce them. The existing lifts were negotiated and agreed to. They should remain. The removal of lifts to concentrate riders into a narrower set of terrain features is detrimental to benefit, use and enjoyment of the park.  
The danger of having too many people at the same spots is also a reality in the plan they are proposing.  
  
Turning Turoa into a two-lift is a very bad idea, look at what the gondola has done on the other side.  
  
The application as is available for the public, contains none of the information required to be able to make any judgement on their ski area expertise, financial prowess etc. If I cannot support a proposal that leaves me no choice but to oppose.  
  
Privatising any the upper reaches of Ruapehu, or the facilities thereon is an absolute slap in the face to the good faith require by the process. It's putting the cart before the horse.  
I have heard iwi voice these concerns already. I support those concerns.

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 and not rush to a short term benefit of a few and a divided ski area.



## G. Attachments

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

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

### How do I submit my objection or submission?

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## A. Permission Application Number and Name of Applicant **SUB 298**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

### C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter

Organisation

Date

## D. Statement of Support, Neutrality or Opposition

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

## E. Hearing Request

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

## **F. Objection or submission**

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

Future financial viability of Turoa skifield if it is split off from Whakapapa. Refer to the trading forecasts that were provided by the PwC VA to the RSSA as attached.

A major concern that Hapu and Iwi have not been properly consulted with. This is disappointing and frustration was expressed by the previous Minister Kiri Allen.

Short term of the concession applied for.

My reasons for my objection or submission are:

Poor management lead to financial troubles with RAL. A high-debt structure meant that the skifields could not weather the covid situation and a bad snow year. To remain financially viable. both skifields need to operate together, with prudent management. Refer to the trading forecasts that were provided by the PwC VA to the RSSA as attached. Otherwise, in the coming years Turoa will likely be back in the same sad situation!

The local Hapu and Iwi need to be consulted with properly. Also, the Tongariro National Park Treaty claim is going through the process. It seems illogical to apply for a 10 year concession, all parties should meet together with the view to a multidecade concession to give future assurances of viability.

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 privatisation of RAL ski area assets to be rejected. The crown to retain the existing concessions. The crown to consult and engage local Hapu and Iwi properly.



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## 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
Long_term_FM	jpg	Picture file of modelling

### How do I submit my objection or submission?

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto: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.

**Table 8: 2.12 RAL Long Term Financial Model Trading Forecast projections**

	2024	2025	2026	2027	2028	2029	2030	2031	2032
	\$'000s	\$'000s	\$'000s	\$'000s	\$'000s	\$'000s	\$'000s	\$'000s	\$'000s
<b>RAL Enterprise Value</b>									
<b>Whakapapa</b>									
Whakapapa Net Operating Contribution - Winter	9,208	9,692	9,703	9,715	9,732	9,754	9,782	9,816	9,858
Whakapapa Net Operating Contribution - Summer	634	1,211	1,477	1,946	2,577	3,365	4,351	5,583	7,101
Whakapapa corporate overhead allocation	-5,218	-5,252	-5,262	-5,280	-5,304	-5,334	-5,372	-5,419	-5,477
Whakapapa non-cash winter life pass revenue	-1,001	-1,001	-1,001	-1,001	-1,001	-1,001	-1,001	-1,001	-1,001
<b>Whakapapa EBITDA</b>	<b>3,624</b>	<b>4,651</b>	<b>4,917</b>	<b>5,380</b>	<b>6,004</b>	<b>6,785</b>	<b>7,760</b>	<b>8,979</b>	<b>10,482</b>
Whakapapa Gondola coupon payments	-919	-1,181	-1,233	-1,377	-1,557	-1,782	-2,062	-2,414	-2,845
Whakapapa Capex allocation	-2,525	-2,200	-1,875	-1,800	-2,000	-2,000	-2,000	-2,000	-2,000
<b>Whakapapa Free Cash Flow before change in working capital &amp; tax</b>	<b>180</b>	<b>1,270</b>	<b>1,809</b>	<b>2,203</b>	<b>2,447</b>	<b>3,003</b>	<b>3,698</b>	<b>4,566</b>	<b>5,636</b>
<b>Tūroa</b>									
Tūroa Net Operating Contribution	4,746	4,746	4,746	4,746	4,746	4,746	4,746	4,746	4,746
Tūroa corporate overhead allocation	-3,665	-3,690	-3,699	-3,712	-3,731	-3,754	-3,783	-3,819	-3,863
Tūroa non-cash winter life pass revenue	-746	-746	-746	-746	-746	-746	-746	-746	-746
<b>Tūroa EBITDA</b>	<b>335</b>	<b>309</b>	<b>300</b>	<b>287</b>	<b>268</b>	<b>245</b>	<b>217</b>	<b>181</b>	<b>136</b>
Tūroa Capex allocation	-2,675	-3,000	-1,875	-1,150	-1,000	-1,000	-1,000	-1,000	-1,000
<b>Tūroa Free Cash Flow before change in working capital &amp; tax</b>	<b>-2,340</b>	<b>-2,691</b>	<b>-1,575</b>	<b>-863</b>	<b>-732</b>	<b>-755</b>	<b>-783</b>	<b>-819</b>	<b>-864</b>

Sec 9(2)(a)



## A. Permission Application Number and Name of Applicant

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

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

## C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	MAXWELL DIVETT
Organisation	PERSONAL
Date	8/02/2024

## 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

Permissions Application Number 109883-SKI

## F. Objection or submission

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

I SUPPORT THIS APPLICATION

My reasons for my objection or submission are:

I WANT TO SKI

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.

IT BRINGS INCOME INTO OHAKUNE

## G. Attachments

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

**How do I submit my objection or submission?**

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**From:** [Mark Holmes](#)  
**To:** [Mtruapehusubmissions](#)  
**Subject:** Proposed sale of Turoa  
**Date:** Thursday, 8 February 2024 8:35:53 pm

SUB 300

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

To whom it may concern

I do not support the sale of Turoa to PTL

I believe the best interests of mountain users is when RAL is restructured with new management and initially supported through the process by MBIE

Existing consents would be in place and staff could be retained and incentivised under new management. There is no financial advantage to the tax payer by splitting the fields and offering capital to another group and not the existing RAL

Local Iwi will want a big voice going forward after the National Park tribunal hearing. Iwi should have a big presence on any management committee as the path forward will need to be consistent with the aspirations of both Iwi and DOC

The last 70 years has seen the sports of skiing and hiking serve the needs of a big section of the community and this was achieved largely by the efforts of people who gave their time ,efforts and money to help create what is the largest alpine recreation are in NZ

The last three years have given every body a wakeup shock that has exposed weaknesses on several fronts but the future is bright if every one pulls together as we once did

Regards Mark Holmes