

**A. Permission Application Number and Name of Applicant** **SUB 301**

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	Ruben Devis-Marks
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:

All in general

My reasons for my objection or submission are:

Submission:

I have faith that PTL will operate and adhere to all of the requirements of DOC, Iwi and the public while having a strong focus on the cultural significance, engagement with Iwi all the while providing valuable recreational activities for the public.

Reading their application, it is obvious that they are fully engaged and committed by their word on the matter.

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 amendments required.

Maintain engagement with tangata whenua, reduce footprint, provide excellent recreational service.

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 302**

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	David Watt
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:

A new separate company, Pure Turoa Limited, to be set up to operate the Turoa Ski Field.
The short duration of the lease, 10 years.
The removal of three lifts/tows from Turoa skifield.

My reasons for my objection or submission are:

The most rational, sensible and logical approach would be to keep RAL Lifts Ltd intact and to continue operating/maintaining the lifts and infrastructure on both Turoa and Whakapapa ski fields. They have been doing this for the last 70 years, at Whakapapa anyway, and have generally done a good job and this should be allowed to continue. It is through no fault of theirs that two seasons were seriously disrupted by Covid, followed by a poor snow season.

As RAL already have a 60 year lease to operate the skifields, surely it makes far more sense to allow them to operate Turoa instead of the proposed new company, Pure Turoa Ltd, who would have only a 10 year lease to operate.

The debt is still to be repaid regardless as to who operates the skifields.

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.

Allow RAL to continue to operate both Turoa and Whakapapa skifields and not allow a new company to operate Turoa.

I fully support the views given by the Ruapehu Skifields Stakeholders Association.

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'.

A. Permission Application Number and Name of Applicant **SUB 303**

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	Dion Cruse
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:

The granting of "Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years."

My reasons for my objection or submission are:

Turoa Ski Area is critical to the surrounding area, the residents, business, schools, tourism (this list goes on).

The presence of Pure Turoa will ensure there is a responsible entity on the mountain ensuring maintenance of infrastructure opposed to the current infrastructure rotting away on the Maunga and becoming a cost to the people of New Zealand via DOC having to remove it.

Having an operator on the Maunga also ensure safety for visitors as there will always be visitors venturing up the mountain with or without an operator – without an operator this will open up huge risk for public safety, especially in the winter months with avalanche risks, ice on the roads etc. Even if the roads are closed, people will always find their way up there.

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 am not seeking any parts of the application to be changed.

G. Attachments

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

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

A. Permission Application Number and Name of Applicant **SUB 304**

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	CORNELIA MARTIN-AUSTIN
Organisation	
Date	8.2.2024

D. Statement of Support, Neutrality or Opposition

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.

F. Objection or submission

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

Rushed process not taking into account the special nature/character of the maunga and the need to slow down and get things right.
Privatisation prior to settlement of Treaty claims.
Proposed reduction in lifts esp. beginner and intermediate lifts.
Lack of sufficient disclosure of important information such as finances.

My reasons for my objection or submission are:

I have always enjoyed skiing and especially so on Mt Ruapehu. One of my favourite things about it is the community; the ski villages, the intergenerational families, the academies. All of this could be lost through this privatisation; mainly due to the following reasons:

- 1) Where are beginners suppose to now ski at Turoa?
- 2) What about the congestion that is going to be created at the base area? Queues can already last up to 45 minutes before these lifts have been removed?
- 3) What about families that use the park facilities at Turora and Happy valley at Whakapapa. We should be retaining the ski fields under 1 umbrella.

This has been a hugely rushed process, with a large amount of money spent with few outcomes achieved. Why are we not using the money to get things right.

This corporate situation goes completely against the family approach set up by RALs founders.

The 10 year concession timeframe is not going to be long enough for anyone to want to be able to invest.

Where is the iwi accounted for in any of this? There is an entire National Park Treaty Settlement to process. Until that process is done we don't know who wants to be at the negotiating table, who wants to look after the mountain etc. We don't know the legal status of the peaks etc. We should be honouring and allowing this process to happen. We have all heard iwi voice their concerns already and we should support them.

The application available to the public also contains none of the information required to be able to make any judgement on the ski area expertise, financial prowess, ability to remove equipment off the mountain if they then go bust etc. If I cannot see and support a proposal then I must oppose.

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 assets. Crown should retain existing concessions.

The Crown needs to engage with iwi and the wider community to run the ski areas to best industry practice to allow a working relationship until the National Park Treaty claims are settled.

At that stage a proper solution can be worked towards. We all (including iwi) deserve better.

G. Attachments

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

How do I submit my objection or submission?

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

From: [Mitchell Job](#)
To: [Mtruapehusubmissions](#)
Subject: Vote pure turoa
Date: Thursday, 8 February 2024 9:12:30 pm

SUB 305

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

I hear by wish to give my vote and support to Pure Turoa Ltd and hope they are able to operate the ski field for years to come. I can not work the submission forms supplied.

So let this be my vote.

Pure Turoa Ltd

Sent from my iPhone

A. Permission Application Number and Name of Applicant **SUB 306**

Pure T roa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate T roa 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 Corkill
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:

The future of the Ohakune community and the accessibility of the Tongariro national park for all New Zealand to enjoy and create life long memories.

My reasons for my objection or submission are:

Sec 9(2)(a) that relies so heavily on the visitors generated by the sport of skiing and snowboarding at Tiroa and I know how much this community has already suffered with the covid years and now all the uncertainty if the concession was not granted.

Pure Tiroa has the opportunity to keep the dreams of many New Zealanders alive, by continuing skiing and snowboarding at Tiroa, Families, Friends, or anyone who has a passion for the outdoors or just wants to come and enjoy our national park will continue to have the opportunity to do so.

Sec 9(2)(a) and there is an allure to Ruapehu. So much power and so much beauty. I have meet life long friends, created a career and found a home. I encourage you to come and talk to the community of Ohakune. The people that this concession matters most too. Come and see the passion for life and adventure that comes with living and playing in this beautiful national park we all love and cherish.

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.

Give Pure Tiroa an opportunity to show us what they can do.

G. Attachments

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

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

How do I submit my objection or submission?

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

A. Permission Application Number and Name of Applicant SUB 307

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	J Harris
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:

- Reduced public access to the National Park.
- Concession application timing prior to the settlement of the Tongariro National Park (TNP) Treaty claims.
- DOC taking ownership of the make good obligations, placed on Applicants in previous concessions.
- New ecological assessment not commissioned or provided (RAL’s wider 2011 report used).

My reasons for my objection or submission are:

- Reducing public access to the National Park through:
- Reduced facilities for all skiers due to the planned removal of lifts.
 - Reduced facilities for learner skiers, and increased risk to learner skiers using higher level runs.
 - Reduced access for public due to reduced overall capacity.
- The TNP Treaty claims have not yet been heard, and Iwi have made multiple public statements that they do not support the PTL concession.
- No evidence has been provided to demonstrate that the Applicant will be able to maintain the facilities or the National Park environment and attract investment in the first 3 years (due to the 10 year concession limit), or after a 3 year renewal point. The required millions of dollars in Government support indicate deficiencies in this area. A PTL failure would leave DOC with a significant make good liability. The current situation with the Chateau demonstrates the risk of a for-profit private company leasing significant National Park infrastructure.
- The Applicant’s statement regarding “given time constraints” (page 27) indicates that the speed of the process is leading to the unnecessary use of assumptions, which may not be in the best interests of the National Park.

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 application, and any others, until the TNP Treaty claims are negotiated and settled.

G. Attachments

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

How do I submit my objection or submission?

A. Permission Application Number and Name of Applicant **SUB 308**

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	Brian Cruse
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:

The granting of "Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years."

My reasons for my objection or submission are:

Turoa Ski Area forms large part of back bone of the economy for the Ohakune and wider Ruapehu region via customers and seasonal staff. It is vital for the region's economic stability that Turoa continues to operate but in a more stable manner that address the requirements of the National Park status and lwi.

Pure Turoa have shown the want to work with lwi, the community and the requirements of running a business in a National Park.

Prue Turoa's plan respects the wishes to limit the footprint of the area while providing the level of facilities expected of a modern ski field.

The known head staff of Prue Turoa have worked in the industry for many years giving them a high level of understanding of the business and local knowledge to operate in the unique environment that is 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.

I am not seeking any parts of the application to be changed.

G. Attachments

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

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

A. Permission Application Number and Name of Applicant **SUB 309**

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	Charlotte Riedweg
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:

My reasons for my objection or submission are:

Would like to keep skiing and taking the family up to Turoa.

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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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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5. **A. Permission Application Number and Name of Applicant** **SUB 310**

Pure Tūroa Limited 109883-SKI

6. **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.

7. **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	Conrad david stephens
Organisation	La pizzeria - ohakune junction
Date	7/02/2024

8. **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).

9. **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

10. F. Objection or submission

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

The whole thing

My reasons for my objection or submission are:

As a local Ohakune business own of 20 years, I fully support PURE TUROA'S Application to operate turoa ski area

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

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

I would question the lease only being 10 years. Which seems to me a very short time for a business investing millions of dollars.

11. G. Attachments

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A. Permission Application Number and Name of Applicant SUB 311

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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

C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	Rebecca McMaster
Organisation	
Date	08 February 2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

I support the intentions Pure Tūroa have listed on their website which include:

- a commitment to work closely with iwi and environmental experts
- the plans to reduce the ski lift ground footprint at iwi request
- an environmentally focused operation
- upgrading infrastructure in the base area to create a year-round tourist experience
- better management of electricity and diesel use with a move to alternative sustainable fuels
- becoming a zero-waste consumable operation
- offering sustainable transport options

My reasons for my objection or submission are:

Paired with the above this is the only viable option on the table to ensure snow sports on Tūroa continue into the future, which will protect the livelihoods of many staff, businesses and others in the Ruapehu region.

I am happy to support this application if the local iwi are in support of this submission.

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.

Filming Concession

I have limited understanding in this area, but I believe that iwi have tikanga and/or restrictions around photography (and I assume filming) of the maunga. If this is correct I would hope this tikanga would be upheld for any filming Pure Tūroa undertakes.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 312**

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	Lucy Nolan
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:

Insufficient disclosure of important information.

Proposed reduction in lifts by the applicant.

Short term of the concession applied for.

Splitting the fields will pose a high risk of Turoa going under again.

RAL ran for 70 years as a non-profit entity, mostly successfully. Recent issues are primarily due to over-investment on/taking on too much debt for the gondola, compounded by COVID impacts and one very poor snow season. The best structure for the nature of the field remains not-for-profit.

Privatisation prior to negotiation (let alone settlement) of TNP treaty claim(s).

My reasons for my objection or submission are:

The insufficient disclosure of important information has made it impossible to assess the applicant's suitability.

I understand the wider ski community have communicated a clear preference for; Retaining both ski areas under one umbrella, retaining not-for-profit, and retaining community ownership/accountability. The proposal goes against what the people want.

The proposed removal of lifts (including those providing access to beginner and intermediate areas) will detrimentally affect the field by concentrating skiers/riders onto fewer runs. This will not only cause congestion and significantly reduce enjoyment of the field, but is a very real safety concern as skiers/riders of different abilities are lumped together on the same slopes. Ultimately, this is likely to drive patrons away to other fields, hurting PTL's bottom line, making the venture unprofitable, and harming the surrounding communities in the process.

The proposed 10 year concession timeframe is simply not long enough to be viable. Very few (if any) people will have the confidence to make the significant investments required to maintain quality ski area infrastructure, when there is only a 10 year guarantee of the ability to operate the field.

Further, Turoa has been run for-profit in the past - and failed. It has lasted no longer than 4 - 10 years on its own, split from Whakapapa (whereas it lasted 20 years under RAL ownership together with Whakapapa). It relies on the Whakapapa subsidy as it cannot meet it's own capital requirements, and is much stronger when paired together with Whakapapa.

Lastly, the Tongariro National Park Treaty claim process is yet to proceed, which means it is unclear who will be at the negotiating table, and who will ultimately have Mana Whenua over what. Privatising any of Ruapehu, or its facilities, is a breach of the good faith required in that process. I support the concerns of iwi in this regard.

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

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

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 reach a long-term, certain solution for all - not just skiers/boarders but the surrounding communities. In the meantime, the Crown to run the ski areas to best industry practice, to allow the time and safe working relationship for TNP claims to be settled.

G. Attachments

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

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

How do I submit my objection or submission?

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

A. Permission Application Number and Name of Applicant SUB 313

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	CAROL ANDERSON
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:

1. The duration of the concession requested is 10 years.
2. The Tongariro National Park (TNP) treaty claim(s) have not been negotiated or settled.
3. Redacted and missing information to know if Pure Tūroa Limited (PTL) will be financially sound.
4. Iwi Consultation has not been confirmed.
5. 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.

Has the existing concession been dissolved? If not, how can this application proceed?
The short length of the concession sought indicates a lack of a long-term commitment to the ski field operation. This has not been explained by PTL.

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

Given the current environment, there is a very high chance that litigation may result should the concession be awarded to PTL, without consideration and accommodation of the impending Treaty Claim. This is especially so, due to the existing RAL concession and relationship between RAL and the treaty claimants.

3. It is difficult to tell if PTL has the financial resources to run Turoa Ski field.

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

Information on the Directors etc has been redacted. The Business Plan is confidential. How are the public supposed to have confidence in a new entity that will need a large amount of capital and resources to establish and run a ski field on an active volcano, which is in an avalanche path and is subject to heavy winter icing on the infrastructure?

4. Iwi consultation has been the subject of hearsay. What is the real situation between PTL and the local Iwi?

Given (2.) above, what discussion have taken place between PTL and Iwi leaders? There seems to be some in support and some against the new private entity running Turoa. It is impossible to tell fact from fiction and very concerning especially as the maunga is sacred to the local Iwi. Is there a mutual respect and cooperation between Maori and PTL and will Iwi support this application or block it?

5. 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 giving rise to my objections (2.) and (4.).

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.

An explanation of the way in which the current concession has, or will be, extinguished. If it has not been extinguished and this concession is rejected, what is the outcome then? If it is that all infrastructure is removed, then how can this situation be mitigated to enable snow sports to continue at Turoa?

Why has PTL only applied for a 10 year concession (with right of renewal). Is this a lack of confidence in the climate, or in their operation?

Any concession needs to show partnership and/or endorsement from mana whenua. Clarify what the situation actually is and seek assurance from PTL that they have Iwi support for this concession, and especially with regard to future Treaty claims. If this ends up in court, then it is likely to send PTL into insolvency too.

PTL needs to explain to the public how they will operate a ski field in one of the hardest environments in the world. Specialist skills are needed to de-ice equipment after storms and ensure that the field is safe from avalanches. Will experienced staff be hired and paid well enough to attract and keep them?

Does PTL have the financial resources to safely run the whole Turoa operation?

staff the lifts and clear/manage the road

Ski patrol and avalanche clearance

Groom the runs

Run the ticketing and ski hire

Café(s)

Parking and crowd management (4500 max)

What will be the relationship between PTL/GNS and DOC with regard to monitoring volcanic hazards and clearing the mountain of customers quickly? Who/What has the ultimate responsibility for closure?

Will commercial imperatives win out against caution?

G. Attachments

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

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

How do I submit my objection or submission?

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

A. Permission Application Number and Name of Applicant SUB 314

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

Damon Forsyth

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:

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

My reasons for my objection or submission are:

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

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

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

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

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

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

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

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

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

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

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

6. Past concessions negotiations took around four years.

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

7. Key information has not been provided.

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

Iwi engagement has been completely redacted.

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

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

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

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

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

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

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 315**

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

Catherine Gafa

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:

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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From: [David Worth](#)
To: [Mtruapehusubmissions](#)
Subject: Pure Turoa
Date: Thursday, 8 February 2024 10:22:55 pm

SUB 316

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

Pure Turoa have my complete backing to continue operations at Turoa ski field Sec 9(2)(a)

The work they have done in pushing forward for the tender to operate the maunga in the last year of so has been immense and only confirms the passion they both have for this mountain and the ski community. They have my vote.

Sincerely.

David Worth.

Sent from my iPad

**A. Permission Application Number and Name of Applicant** **SUB 317**

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 OppositionYes I **Support** this Application (I am making a submission)No I am **Neutral** on this Application (I am making a submission).No I **Oppose** this Application (I am making an objection).**E. Hearing Request**Yes I **Do Not** wish to be heard in support of this objection or submission at a hearing.No I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

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

My reasons for my objection or submission are:

I want to see snow sports continue at Turoa.

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

G. Attachments

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

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

How do I submit my objection or submission?

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

A. Permission Application Number and Name of Applicant SUB 318

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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

C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter

Nicola Hoogenboom

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:

Splitting Whakapapa and Tūroa ski fields

My reasons for my objection or submission are:

For the past 30 years Ruapehu has been my favourite place to ski (and snowboard). When weather and social company permits, Tūroa has been our family's slope of choice, particularly as we enjoy visiting Ohakune, where we hire accommodation, buy clothing and gear, grab a drink at the end of the day, go out to dinner, and get coffee before we go up the mountain.

With the split of the two, Whakapapa will need to be our slope of choice, meaning that we will no longer stay in Ohakune, nor hire or buy gear in the town.

The reason for this is that friends who have not skied before prefer to visit Whakapapa on the first day, even with our encouragement.

As it is, a season pass is only marginally (and often not at all) value for money and with the split of the two sides it cannot be a Tūroa pass.

Skiing at Ruapehu is important to me, having the ability to jump in the car on the weekend (weather permitting), visit family on the way home, and enjoy a weekend away. With the two slopes as one entity we are more likely to be able to ski when we go away, meaning we are more likely to travel.

With the granting of this concession, we must say e noho rā Tūroa.

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.

Keep Whakapapa and Tūroa in the same organisation.

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

A. Permission Application Number and Name of Applicant SUB 319

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	David and Sonya Morgan
Organisation	Family of 4
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:

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

My reasons for my objection or submission are:

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

- Our family are skiers and we love Turoa - the Dark Side (a nickname given to Turoa as it sits in the shadow of the sun for the morning).
- Members of our family have skied at Mt Ruapehu on and off for the last 30 years. We hold two Life Passes purchased in 2019 from RAL. In recent years with my two kids 13 and 11 years of age, we average 20+ days per season on Ruapehu – primarily on Turoa but also at times at Whakapapa.
- I have skied at 17 of the circa 27 ski fields in NZ and Turoa has some of the most varied, remote, picturesque and challenging lift accessed terrain of all the ski fields in NZ – to lose this would be terrible.
- To be able to get the high noon lift and ski onto the Mangaehuehu glacier is in my view a spiritual and special experience that cannot be replicated on any ski field in New Zealand. At the end of the season in 2023 I took a group of circa 15 friends from 5 families (with kids ranging from as young as 6 years old) out to view the glacier and ski the Triangle– they all commented that this was the highlight of their season. We have attached a photo of the group.
- We have strong personal and family connections to the mountains of Tongariro National Park going back to the early 1990's and in addition to skiing we enjoy tramping and mountaineering as forms of recreation together with our family and many of our friends. Sec 9(2)(a) [REDACTED], we are regular and respectful visitors to TNP and being in TNP is one of our favourite things to do.
- In our view it is critical for the survival of snow sports that lift accessed skiing in the North Island continues. While the club fields of Tukino and Manganui are excellent – David has skied at both, they are low on the mountain and have a fickle season. Turoa is afforded a higher altitude and significant snow fall. It is clear to us as we travel extensively skiing in the South Island and also this year to Canada that many of the best NZ ski instructors and ski athletes have learnt their trade on Turoa – the saying goes if you can ski Turoa ice you can ski anywhere in the world.
- Granting the concession would continue to **foster recreation** and therefore be consistent with section 6(e) of the Conservation Act, which states:

“to the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism.”
- While there are reasons to consider delaying the granting of concessions until after Te Tiriti o Waitangi claims have been settled, we believe that the applicant's growing relationship with iwi and others, combined with the relatively short initial term sought (10 years) – noting the ability to discuss further extensions with iwi and the proposal to eventually remove and replace a number of the end-of-life or under utilised lifts mean granting the concession now and then working with iwi collaboratively would appear to be a favourable approach.

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

I submit that the Department of Conservation:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area
2. Consider how the term of the concession can be extended to provide sufficient time for payback of the capital investment required to remove and replace some of the lifts as shown in the indicative development plan, while also respecting and providing for collaboration with iwi so that the outcomes of their treaty settlement can be recognised and provided for by the applicant and DOC when the time comes.

G. Attachments

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

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
Photo of group of 15 people on Triangle. 5 families of Turoa supporters	Families on Triangle.jpg	Photo of group of 15 people on Triangle

How do I submit my objection or submission?

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



A. Permission Application Number and Name of Applicant **SUB 320**

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 of it.

My reasons for my objection or submission are:

I am a local with interest in our local tourism and overall economy. I fully support PTL in their endeavours.

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

A. Permission Application Number and Name of Applicant SUB 321

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	Chris Walls
Organisation	Two Rivers Ohakune
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:

Fully support Pure Turoa taking over and running the Turoa ski field

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

Approximately 50% of our B&B reservations are during the ski season: 200 room nights with 2 people staying. That's 400 hundred people skiing/boarding and using the cafes, restaurants, supermarket, petrol station, ski hire and other shops in town.

It is also 200 room nights that need to be cleaned, and we employ a local lady to clean the B&B.

We have a large, established garden and employ another lady to maintain our garden.

Our accountant is based in Ohakune.

Our solicitor is based in Ohakune.

We buy stationery and branded clothing within Ohakune.

The eggs we use for breakfast are sourced locally.

The jams we provide for breakfast are sourced locally.

The complimentary beers that we leave for our guests are brewed locally.

Our children work at Turoa in the winter, our son is full time maintenance at Turoa.

This is more than just a rich man's play area, it keeps many families together. It employs cleaners, baristas, gardeners, check out assistants, chefs, waiting staff etc not just for winter, but all year round, which in turn keeps the cafes, restaurants, shops etc open all year round too.

The local primary school and college students have an awesome asset on their doorstep, something the city kids most definitely envy, and several of the current ski and board talent competing worldwide, grew up and learned their skill at Turoa.

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.

Keep the ski fields open and allow Pure Turoa to take over at Turoa.

G. Attachments

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

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

How do I submit my objection or submission?

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

From: [Aedan Heketa](#)
To: [Mtruapehusubmissions](#)
Subject: Pure turoa
Date: Thursday, 8 February 2024 10:48:20 pm

SUB 322

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

I'm am all for pure turoa. I have done 25 seasons in ohakune and know all the best workers on the mountain and so does [Sec 9\(2\)\(a\)](#). He's a very skilled and intelligent man. If anyone can make ruapehu successful, it's him. He knows all the top workers in their field's. That's what it will take to be successful. Hard working people who love what they do. My vote isn't just for pure turoa, it's for the skilled workers that he will bring.

A. Permission Application Number and Name of Applicant SUB 323

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	Liana Smith
Organisation	
Date	8 th February 2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

The positive environmental impact and positive community impact Pure Turoa will have on the maunga and the local communities.

My reasons for my objection or submission are:

As a local and ^{Sec 9(2)(a)} a user of the skifields (both Turoa and Whakapapa) I fully support Pure Turoa's bid to take over the Turoa Skifield.

Positive environmental impacts: with the removal of the Nga Wai chairlift, and the limiting of visitor this will positively impact not only the environment of the Maunga with less infrastructure and human waste it will also positively impact the pollution from 4wd vehicles congesting the road most weekends. This also positively impacts the local township of Ohakune where we consistently see extra waste and rubbish around the place, heavy traffic on weekends.

Positive community impacts: although there is more to Ohakune and the local area other than the skifield, our community still heavily relies on the skifields to bring business to our local businesses, provides employment and income for a lot of families as well as a sport and physical exercise to our local kids.

I have a successful career here in NZ and a lot of those initial skills I learned in my early years were gained working on Ruapehu. This includes, mountain and outdoor safety, customer service, leadership, emergency management, how to read weather reports and weather patterns, safe driving to name a few.

The Pure Turoa team are a team of local residents who know the maunga, know its community, the weather patterns and environmental issues (ice, storms etc) the value it has on our community and the life long friendships and valuable skills gained by all those who have spent time on it.

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

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

The approval of the concession for Pure Tūroa to operate at Tūroa Skifield on Mt Ruapehu which will support the local environment, maunga environment and the local community surrounding Tūroa Skifield.

G. Attachments

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How do I submit my objection or submission?

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

A. Permission Application Number and Name of Applicant **SUB 324**

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	Alice Walls
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:

I support Pure Turoa in taking over the ski field.

My reasons for my objection or submission are:

Sec 9(2)(a) . I am very passionate about the ski field and the area we live in. Many businesses, families, and organisations rely on the ski field being open to make a living. I am in support of Pure Turoa to run the 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.

Pure Turoa to take over Turoa ski field, and keep the ski field open.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 325**

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 Huband
Organisation	N/A
Date	8 th February 2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

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

My reasons for my objection or submission are:

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

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

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

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

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

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

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

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

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

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

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

6. Past concessions negotiations took around four years.

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

7. Key information has not been provided.

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

Iwi engagement has been completely redacted.

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

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

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

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

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

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

G. Attachments

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**A. Permission Application Number and Name of Applicant** **SUB 326**

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 Maree Lilo	
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Organisation N/a	
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Date 8.2.24	
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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** 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 operating the mountain for the next 10 years

My reasons for my objection or submission are:

I believe it is detrimental for the community to keep turoa 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.

I support Pure turoa.

G. Attachments

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

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

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A. Permission Application Number and Name of Applicant SUB 327

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	Brett Dickson
Organisation	n/a
Date	7 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:

This submission relates to management of the Ohakune Mountain Road and visitor safety related to proposed infrastructure changes.

My reasons for my objection or submission are:

I have three specific items in the concession application that I believe require additional clarity:

1. The proposal talks about restricting access to the car parks as a demand management tool. However it not clear where on the Ohakune Mountain Road a barrier would be placed. This is important as the upper parts of the road provide access to other mountain activities – for example, the Round the Mountain/Lake Surprise track and the Te Ara Mangawhero cycle trail (when completed). Depending on how a barrier is used (for example, overnight closures), it is probable that some people would attempt to queue at (or near) the barrier. This could also have an impact on access for other mountain users.
2. An important function of the current cafe attached to the Giant return building is a bad weather shelter. This is important as the weather on Mt Ruapehu can go from clear skies to white-out in less than 90 minutes. On days with passing clouds it is normal to see the Giant cafe used by a large number of skiers when the weather makes it unwise to be outside. It is unclear if the return building (and cafe) will be removed alongside the planned removal of the Giant chair lift. Assuming the Giant chair is removed, there is an argument that the existing Giant cafe is in the wrong location for a shelter and that for safety reasons would need to be replaced with a new structure at Blyth Flat near the top of the Movenpick & base of the High Noon.
3. The planned removal of the Giant chair lift will force skiers who would normally use this lift to migrate to either the Movenpick or High Noon chair lifts. For many people, I expect this to be the High Noon chair as the easy terrain accessible from the High Noon is similar in difficulty to the terrain accessed from the Giant.

There are several ski runs that head west from the top of the High Noon and Giant chairlifts. Many of these runs (for example, Why Not, Bread run, Race line, Main trunk, & Branch line) return back to the main field below the level of the High Noon lift base station. Skiers using these runs currently use the Giant to head back up the mountain. It is not clear after the planned removal of the Giant if people would need to ski to the base area or if the Movenpick replacement chair lift would have a mid station (as has been speculated online). If people were forced to ski to the base area from these western runs, it is probable that many skiers would migrate to other runs that feed directly back to the base of the High Noon.

In my experience skiing at Turoa over the last 15 years, at weekends and on fine weekdays (especially Mondays and Fridays with people taking a long weekend), the queue for the High Noon can stretch along way up the hill from the drive building. With the migration of people to the High Noon and the move away from some western ski run, new choke points just above the High Noon base station are likely to be created (similar to those that already exist on Clary's Track). The concession proposal doesn't contain any analysis detailing how possible changes to the field might impact congestion or skier safety.

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. The concession application requires more detail around the management of the Ohakune Mountain Road to understand how access for other mountain users will be retained. Any barrier should be at or above the top of the planned Te Ara Mangawhero cycle trail. The barrier needs to be sited so that other mountain users are not impeded by the barrier or by people queuing for the barrier. If the barrier is installed near the Massey University Alpine Club (MUAC) hut, the Round the Mountain / Lake Surprise track should to be modified to leave from the car park opposite the MUAC hut.
2. Given how fast the weather can change on the mountain and the potential for serious harm (including death) presented by the weather, the concession application needs to detail how changes to lifts and buildings on the mountain will impact visitor safety.
3. The only skier safety analysis detailed in the concession application is retrospective crash analysis. Where major changes are planned to the field I would expect an applicant to have the knowledge necessary to produce the pre-emptive analysis required. This evidence needs to be presented in the concession application to demonstrate that there are no adverse safety implications.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 328**

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	Bruce Williams
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:

The way this whole process has been rushed, with limited consultation, in secrecy.
The plans of PTL regarding the future of Turoa.
DoCs plans for the future of Turoa.
Lack of consideration for existing users/investors (particularly Life Pass Holders).

My reasons for my objection or submission are:

I am an experienced and expert skier who has been skiing Turoa almost since its inception (40 years skiing there, my parents skied there when it opened and even visited it before it opened). Over the years I have gotten to know many of the staff up there and know many of the in's and out's of the resort. I have also skied the main South Island resorts and many resorts overseas including Canada, USA, Japan, Switzerland and Austria while also for a significant period of time selling ski holidays to many of these places so I know the industry very well.

The public has little to no information to base any decision on PTL. Everything has been kept secret. It does not bode well for transparency in a concession in a National Park.

PTL has stated that their plans for Turoa include removing all but 1 chairlift and replacing another (along with improvements to the lower beginners area). This is the complete opposite of ski field operators the world over! Firstly only operating 2 chairlifts means that in the even of disruption the whole ski field can't operate (the recent damage to the High Noon Express bares this out), there are also operational safety concerns with this approach.

Secondly by focusing skiing (also Snowboarding) on a narrow corridor it creates increased conflict between skiers due to the increased congestion. This leads to increased injuries and can lead to fatalities. It ruins the experience for everyone and makes the resort less appealing compared to other resorts (South Island and/or overseas). This has a direct impact on the viability of the resort and of the surrounding towns.

DoC and PTL have stated that they wish to remove the Nga Wai Heke Chairlift. I consider this to be a foolish decision. I can't think of any ski resort in the world that is actively removing lifts like this. It simply reduces the ability of the public to access the ski field/National Park while making the experience worse for all users and creating unnecessary safety hazards. Firstly it will cost DoC millions - better to leave it in place and if in 10 years time it is unneeded then remove it then - save the money in the meantime. It creates a safe option for people to return to the main ski area from some of the more advance runs (and the glacier). People used to ski this before the chairlift was there but then would be stuck and either need assistance or would need to undertake a dangerous traverse or walk (often in hazardous alpine weather conditions to return to the main area). There have been too many fatalities on Ruapehu to ignore the alpine weather factors. Furthermore, there is nothing wrong with this chairlift! It was first constructed in 1994 (as the High Flyer) meaning it is only 30 years young (The Parklane and Giant are 45 years old by comparison). Furthermore it was mothballed for a season when it was moved and became the Nga Wai Heke. It was then refurbished and during covid and the 2022 season it was basically not used to save money (and lack of snow cover). This means that really it is only about 26 years old (and having been recently refurbished is more like a 20 year old lift). Plenty of life left in it and it provides some of the best terrain on the whole mountain. The ONLY real issue with this lift is that in lean snow years it becomes expensive to operate as snow groomers have to push a lot of snow around to make it work. This would be easily resolved by limited snow making and/or some minor rock farming/grooming. The lift can't be seen from the surrounding area and even around the base area of Turoa it is hidden. It really is the least "problematic" in terms of appearances in a National Park of all the lifts. PTL wants rid of it presumably because DoC is paying for the removal, and to save money (which they already intend to do by removing 2 other chairlifts and another surface lift).

Wintergarden is an important area for people to improve and progress their skiing from the relatively flat and crowded beginners area (Alpine Meadow). While I applaud PTL for wanting to expand Alpine Meadow, I don't wish to see that at the expense of Winter Garden. Especially given that Alpine Meadow is below the snow line altitude for much of the season.

Finally PTL has given very little consideration to existing users of the ski field, particularly people who have invested in one way or another in the mountain. Quite simply the facilities would not exist were it not for these people, yet PTL has for the most part ignored them, been outright rude and dismissive of them, and finally presented an offer that is a slap in the face to most.

If they can't care about existing customers then how well are they going to look after a precious area that is a dual status park?

Many locals in Ohakune are supporting them, but in many cases only because they see them as the only option remaining and wish to have the resort remain open in any circumstance for their own livelihoods (can't argue with that). I don't like how RAL ran Turoa (for the most part it seemed that Turoa was treated like the poor cousin), but the synergies of not duplicating management, being able to use your pass at either resort when the weather (as it usually is) is bad made up for that.

Many local iwi would also prefer that RAL remains to run things also.

From my extensive experience, Turoa (and Whakapapa) are marginal ski resorts in many ways. Firstly they simply don't get as much snow (and poor quality at that) compared to international resorts.

Secondly the weather is atrocious – In a typical winter week you might get 2 good sunny days, 2 ok days, 1 atrocious day, 2 closed days. That can easily be worse – 2 atrocious days, 5 closed days.

Overseas many resorts don't have "closed" days. Even on bad days they are still usually good enough to enjoy. The wind on Ruapehu is a huge factor and can close the resort even if it is a sunny day.

The length of the season on Ruapehu is also fairly short. July to October and occasionally into November. 4 months, many international resorts get 5-7 months.

So tally that all up and you get maybe 32 good days, 32 ok days, and the rest is either atrocious or closed. Very hard to make a profit on that! Where RAL managed was by being a non-profit they didn't have to pay tax on profits and they could reinvest into the resort rather than paying shareholders.

Given the above, I don't see how PTL can manage unless they make it too expensive for the masses and make it a very exclusive resort with minimal costs. This will only force customers to look to the South Island or overseas (both of which cause an increase in carbon emissions).

The only reason that RAL went bust was because of 2 years of covid restrictions followed by the worst snow season in decades. If they had received sufficient government support during covid then they would still be operating. The financials of RAL show that it was profitable (with those profits being reinvested) prior to covid. The purchase of a big gondola with associated big loans also hampered their performance during this period. With tourism now returning along with hundreds of thousands of new migrants to NZ the ability of the gondola to generate revenue would be driving RAL to success right now barring the costly loans.

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.

Nga Wai Heke should remain and be operational for at least another 6 years.

Winter Garden should remain.

PTL needs to consider all ski users (including those that wish to use more of the terrain). They should offer previous users (particularly life pass holders) an improved offer (one suggestion is half price off any lift or season pass for the life of the life pass holder).

G. Attachments

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A. Permission Application Number and Name of Applicant SUB 329

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	Helen Leahy
Organisation	Ngā Waihua o Paerangi
Date	9 February 2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

Ko te Whare Toka o Paerangi, koia ko Ruapehu maunga e tū nei i te puku o te Ika-a-Māui hei poutokomanawa mō te Ika.

Ko ngā āhuetanga o te poutokomanawa e hāngai pū ana ki tōna tūranga i waenga i te Kāhui Maunga, tērā ko Matua te Mana.

Ko tēnei mana i ahu mai i te kōpu tonu o Papatūānuku, ka kumea ake e Pikimai Rawea, e Ranginui e tū iho nei, hei whenua, a nā wai rā, hei maunga kōrero, hei pātaka iringa mana mō te Ika-a-Māui tatū mai ki a tātau te kaupapa tangata.

Ko Ngāti Rangi ngā uri a Paerangi atua, a Paerangi tipua, a Paerangi tupuna e hono kau ana ki te mana tuku iho o ngā Atua o te pō heke iho ki a Matua te Mana. He hono tāngaengae i whakatōkia ki roto i te ira tangata taka iho ki a mātau ngā uri whakatupu o Ngāti Rangi, mai te wā i tapaina tō mātau maunga e Māui Tikitiki-a-Taranga e mea ana:

Nāku te ika i hī, nāku anō i whakatau

Ki te haere, whāia i te Pare-i-te-taitonga, tērā taku ika.

Nō Matua te Mana te mana motuhake o Ngāti Rangi, te iwi o Paerangi, heke iho ki a Ngāti Rangi e hāpai ana, e pupuru ana i te mana atua, i te mana whenua, i te mana tupuna urunga tomo ki hēnei rangi ki te mana kei te kaupapa tangata. Ko tōna mana, e hono kau ana ki ngā maunga whakahī me ngā wai tuku kiri o te Ika nui. Nō reira, me pēnei anō, ko te mana motuhake o hāna uri o Ngāti Rangi e tū nei hei tohu, hei whakaatu ki te ao.

Ngāti Rangi are one of the tāngata whenua of this region and take seriously our role as tāngata tiaki over our natural world. Our involvement is required on all consent and concession applications within our rohe, and in all cases, we wish for early and honest engagement with applicants to ensure meaningful collaboration towards a common goal.

Ngāti Rangi is based on the southern slopes of Matua te Mana (Ruapehu). Our cultural identity is linked to his essence; the lifeblood of our people cascade as waters from his slopes; his peaks above are our sacred altar.

When the Crown enabled Tūroa Skifield to be established in 1978 through the authority of a licence granted by the Crown to the then operating company, Ngāti Rangi was excluded from this process.

Ngāti Rangī's position on the skifield has always been one of opposition. Ngāti Rangī were never consulted regarding the construction of the skifield on the sacred slopes of Ruapehu. Our preference is that Ruapehu was left untouched and he be returned to his pristine state.

Ruapehu as our ancestral mountain is deemed tapu to Ngāti Rangī. Because of this level of sacredness Ngāti Rangī believe we have a responsibility to protect the mana and tapu of the maunga and continue to oppose development on the skifield. To protect Ruapehu's mana and tapu state, Ngāti Rangī do not support, and have never supported, development on Ruapehu.

However, given the skifield has been in operation for nearly fifty years Ngāti Rangī remains pragmatic and focuses always on the principle;

*Ko te anga whakamua ki āpōpō
We understand that decisions must be future focused*

With this principle in mind we seek to work in a mana-enhancing way where the spirit of reciprocity works for the benefit of both our environment and the people. This fits within our vision statement for Ngāti Rangī:

*Kia mura ai te ora o Ngāti Rangī nui tonu ki tua o te 1,000 tau
Ngāti Rangī continues to vibrantly exist in 1,000 years.*

On 10 March 2018 Ngāti Rangī signed its Deed of Settlement, Rukutia te Mana. This legislation set a pathway to unleashed potential within our area of interest. Te Waiū-o-te-ika Framework sets out four principles;

Ko te Kāhui Maunga te mātāpuna o te ora:

The sacred mountain clan, the source of Te Waiū-o-te-ika, the source of life

He wai-a-riki-rangī, he wai-ariki-nuku, tuku iho, tuku iho:

An interconnected whole; a river revered and valued from generation down to generation

Ko ngā wai tiehu ki ngā wai riki, tuku iho ki tai hei waiū, hei wai tōtā e:

Living, nurturing waters, providing potency to the land and its people from source to tributary to the ocean

Kia hua mai ngā kōrero o ngā wai, kia hua mai te wai ora e:

The latent potential of Te Waiū-o-te-ika, the latent potential of its hapū and iwi

These principles guide us in our decisions. The proposed activities of Pure Turoa will impact on Te Waiū-o-te-ika. This comprises the entire catchment of the Whangaehu River and all its tributaries. The origin of this waterway is Te Wai ā-Moe, the Crater Lake of our ancestral maunga Koro Ruapehu. This is our most significant awa culturally and spiritually due to its origin and the different qualities it provides for our people; wai ora, wai tapu, wai mouri, wai mana and wai mate. Te Waiū-o-Te-ika upholds the mana of the statutory recognition as a catchment-based approach, an indivisible whole.

The upper reaches of the Mangawhero river flow through the Tūroa ski field. The Mangawhero is the longest of the many tributaries that flow into the Whangaehu River, and is therefore an integral part of Te Waiū-o-te-ika.

Because of the special significance of Te Waiū-o-Te-Ika and in keeping with Te Mana o te Wai framework, our first priority is the health of the wai and the awa. Our second priority is human health and drinking water. Cultivated food production is our third priority. Recreational opportunities such as skiing have low priority. This extends also to the creation of snow using snow-making technology.

The environmental and cultural values of Ngāti Rangi are set out in our *Taiao Management Plan*, which we have attached as part of our submission. Our *Taiao Management* plan is based on four pou, foundations that are important to protecting our taiao. While all these are part of an integrated whole, the important pou as far as this submission is concerned are Tangaroa-i-te-wai for freshwater (p.33 of *Taiao Management Plan*), and Rūamoko, the atua of our maunga Ruapehu (p. 39).

Many of the proposals set out by the applicant will increase the environmental footprint of Tūroa skifield. These will be detailed further below.

Ngāti Rangi would prefer to see no increase in the environmental footprint on our maunga at all. Nevertheless, we acknowledge the economic contribution Ruapehu Alpine Lifts (RAL), and now Pure Tūroa Ltd (PTL) are making to the region, and we are prepared to work towards a resolution, provided sufficient mitigation and safeguards to our maunga and awa are met.

This accounts for our ‘neutral’ application.

Our proposals for mitigation and safeguarding the environment will be outlined below. These are our bottom lines.

We acknowledge that our position on the application from Pure Tūroa is also informed by Te Mana Paenga - our Conservation Partnership Agreement entered into pursuant to clause 7.6.2 of the Deed of Settlement which is attached to this submission. The purpose of Te Mana Paenga is to set out how the Department of Conservation and Ngāti Rangi will work together:

- In the spirit of partnership required under Te Tiriti o Waitangi/the Treaty of Waitangi;
- In a manner that recognises and respects the kawa, tikanga and ritenga of Ngāti Rangi;
- In a manner that furthers the intention of the Conservation Partnership Framework set out in Rukutia Te Mana: the Ngāti Rangi Deed of Settlement;
- To fulfil the agreed strategic objectives

Te Mana Paenga forms part of the Conservation Partnership Framework in order to foster the development of a positive, collaborative and enduring relationship into the future.

In light of Te Mana Paenga, we consider that the Department of Conservation should have prioritised the process by which feedback and response was received from Ngāti Rangi in regards to the Pure Tūroa application.

Te Mana Paenga, for example, requires the Department of Conservation to:

- Discuss “obligations and performance in respect of Te Waiū-o-te-Ika framework” [7.3.5]
- Discuss the Department’s regional and national priorities [7.3.6]
- Opportunities and processes to share scientific and cultural resource and information including data and research material (including to assist the Governance Entity to exercise their role under the Deed of Settlement and as kaitiaki [8.1.1]

- Opportunities for developing mutual understanding and developing relationships with respect to conservation, environmental and cultural matters within Te Mana Paenga area [8.1.2].

We believe that these foundation principles and commitments present a compelling context for how the application from Pure Tūroa should be received.

My reasons for my objection or submission are:

We have read the concessions and all the appendices. These include:

1. Application forms
2. Pure Tūroa proposed outline and Environmental Impact Assessment 2023
3. Cheal Consultants Policy Assessment 2023
4. Turoa ski area Assessment of landscape and Visual Effects 2014
5. Ecological Assessment of the Turoa Ski Area 2015
6. The Economic Benefits of the Ruapehu Ski-fields. RAL 2014
7. IUCN World Heritage nomination for Tongariro National Park
8. Memo on helicopter use 2023
9. Pure Tūroa draft indicative development plan
10. Record of iwi engagement (all information redacted)
11. Application for aircraft activities

Ngāti Rangī staff have also been on site to examine the proposed changes in works approvals from RAL and the Lines Company to ensure the Movenpick and Parklane chairs are compliant prior to selling to Pure Tūroa.

Based on these visits and our reading of the material we have the following concerns.

1. The reports are dated and should have been at least four to six months old not ten years old - A lot has happened since the last application was submitted. The environment has changed.
2. Increases in the total area of structures on the maunga.
3. Damage to the alpine flush and the upper reaches of the Mangawhero stream, which also has ecological value. These sensitive ecological areas are being degraded from:
 - a. Water being discharged from the cafeteria
 - b. Inadequate fencing to protect from the public and from hares
 - c. Sediment from Clarry's track, earthworks above the Mangawhero stream, diggers operating on Clarry's track, and removal of grit from the carpark onto the flush.
 - d. Rubbish.
 - e. The possibility of cycle trails on the upper areas of the maunga concerns us and could cause more damage to the alpine flush.
4. **Snow-making.** Pure Tūroa state that this is a better option than terrain modification, but saying that one option is better than something even worse, does not make it a good thing. Snowmaking may have the following effects.
 - a. Making snow is energy intensive
 - b. In some cases Snomax is used to help seed snow crystals. This comes from bacteria and has known environmental and health effects. It is banned in

Germany and Austria but used a lot in Switzerland. There is no evidence the Turoa snowmakers will use Snomax, but they have not committed to not using it either.

- c. Artificial snow is higher density than natural snow, which could mean it has reduced insulation effectiveness and lower oxygen under the snow. Keeping plants under snow for longer also means a shorter growing season for plants.
 - d. There are also possible hydrological effects, including erosion due to increased snow melt in spring, and the influence on stream flows and aquatic life.
 - e. The Assessment of Landscape and Visual Effects 2014 commissioned by RAL mentions frost heave and mud action as one reason why vegetation throughout the ski area is sparse. The effect of snowmaking and subsequent alterations of ground temperature and water flow on these effects needs to be established.
 - f. Snowmaking will involve abstracting water from the Mangawhero. Unlike the case with agricultural irrigation it does not lead to water loss. The water is 'borrowed' from the catchment, and then returned as snow melt in the spring. However, it does require pumping water from springs flowing into the upper Mangawhero Stream. This is a vital habitat for an alpine flush on the stream banks. The Mangawhero Stream is also part of Te Waiū-o-te-ika and the mauri of the wai will be affected.
5. **Construction of a second Clarry's track.** This was considered on the 2014 Ecological Assessment for RAL, which Pure Tūroa have submitted. It is disappointing that a more recent ecological assessment was not included within the submission. The assessment mentions 'new technology' that allows a stream to be covered so artificial snow can be piled on top for skiing. The snow and the cover can then be removed at the end of the season. The proposed route for the second track is the Mangawhero soak area, which is a sensitive habitat with high biodiversity. No details or assessment of effects for this proposal are provided. We absolutely oppose any development which could affect the mauri of the awa. This application for concession is not what I would expect from a company who has said to us that they want to tread lightly. We will not let the awa be buried by snow unless it is a natural occurrence. Te Waiū-o-te-ika is an indivisible whole and must be respected as such.
6. **Removal of human waste.** Pure Tūroa plan to continue with the present process of removing waste from the maunga to the Ohakune treatment plant. Proper treatment of human waste is an important component of the *Taiao Management Plan*. However, the present arrangement is contributing to the wastewater plant becoming overburdened in winter. This is due to both direct and indirect effects of the skifield. Directly because of waste being transported from Turoa. Indirectly because of the impact from ski tourists staying in Ohakune.
7. **Aircraft noise.** The Department of Conservation have strict controls over flights over the National Park, partly to preserve quiet enjoyment for visitors. This is specified in the General Policy for National Parks 2005 (Policy 8.1). Pure Tūroa have listed instances where flights are required for safety and commercial purposes, though they have indicated that drones will be used instead of manned aircraft where possible. Drones are quieter and less intrusive than aircraft.
8. **Lowering of the second carpark.** This is mentioned in the application. No details are given about how this will be done, but it will require substantial earth works, with

potential for damage through sediments and water scouring, as well as intensive energy requirements.

9. **Increase in summer activities including mountain biking.** This will increase the environmental footprint. Mountain biking disturbs the sub-alpine environment more than walking.
10. **Revegetation.** Pure Tūroa state they will revegetate areas they have disturbed. Alpine vegetation is hard to establish on site and often requires a separate nursery to grow it to a stage where it can be replanted.

There are some positive parts of the application.

1. Pure Tūroa have outlined their intention to reduce visitor numbers and co-operate with Department of Conservation in removing redundant infrastructure. While this has always been a request of ours to remove these the ski field operator has never followed through until the Crown has offered financial support to do so. This is absolutely an area that Ngāti Rangi will be watching closely and will expect this to be upheld. Ngāti Rangi is supportive of the redundant infrastructure being reduced and the remaining lifts being improved.
2. Pure Tūroa have stated their intention to co-operate with Ngāti Rangi. We are keen to both reinstate our Te Pae Toka partnership agreement where we can exercise kaitiakitanga and to update, strengthen and revitalise the desired outcomes. Te Pae Toka is a philosophical notion of upholding our duty as tangata tiaki to the Atua Rūaumoko, Tangaroa i te wai maori and our sacred ancestral mountain Ruapehu. As descendants of the maunga it is also our duty to protect our guests who come to the maunga for recreational, spiritual or to experience the presence and energy our maunga provides. Doing this allows us to express our rangatiratanga it allows Ngāti Rangi to tell our own stories and to control how those stories are told. Ngāti Rangi is open to having conversations to provide an opportunity as part of the tourism experience, that is resourced by Pure Tūroa. This should attract tourists and provide mutual benefit. We note also the commitment in Te Mana Paenga towards establishing a Centre of Innovation, the Southern Gateway to the Tongariro National Park [11.1]. Such a Centre will have tangible and enduring value in relation to cultural heritage, ecological protection, scientific and research exploration in areas such as volcanology, climate change, environmental awareness, tertiary education.

“The Department and Ngāti Rangi will explore opportunities to coordinate activities and services that would support this project within Te Mana Paenga Area”.

3. Pure Tūroa will be encouraging public transport by charging for carparking. This will reduce their carbon footprint and encourage new bus and shuttle businesses. Now that the Mountain Road re-alignments have made the road safer, public transport will become more of an option.
4. Pure Tūroa are not planning on extending any carparks. In terms of habitat destruction and visual impact, the car parks represent the most environmentally damaging aspects of the footprint.
5. Pure Tūroa have stated in their constitution that they will continue the business model of RAL and not pay dividends. This means profits can be re-invested in the area. According to information on the Companies Office website there are two directors and shareholders. One lives in Ohakune and is also a director/shareholder in Big Mountain Mead Ltd., Old Station Road Ltd., Ohakune Brewers Ltd. All local businesses. This means one of the owners will have an incentive to invest in the town, and to even cross subsidise between activities that assist Pure Tūroa and that assist the town.
6. Pure Tūroa have considered developing activities for the summer, which will provide income and employment for the town all year round. This includes using the lifts for sightseeing, not just skiing, something that RAL have not been doing.

We do however require that Pure Tūroa address our concerns, as listed below.

1. Pure Tūroa need to continue with the existing agreement between RAL, Department of Conservation and iwi to remove redundant structures. In order to mitigate the increase in environmental footprint from building new structures, these need to include structures other than those listed by Department of Conservation. Ngāti Rangī have identified redundant structures, including a hut used to store rope, and a plastic broken drain leading from the carpark. This was the topic of an incident report by RAL in December. Ngāti Rangī recommended the plastic drain be removed and drainage replaced by underground culverts.
2. Pure Tūroa need to employ at least one cultural monitor and guide, who will report to Ngāti Rangī. These people will uphold and administer tikanga and kawa and monitor for accidental discovery.
3. Likewise, Pure Tūroa need to employ at least one environmental monitor who will report to Ngāti Rangī. Environmental monitors will monitor for rubbish removal, sediment control, protection of the awa and maunga and ensure sensitive ecosystems are protected.
4. Cultural and environmental monitors will identify further redundant structures for removal.
5. Pure Tūroa will need to provide an assurance that snowmaking will use water only, and not snowmax or anything similar.

6. There should be regular monitoring of vegetation, stream flows and ground temperatures under artificial snow. The ecological assessment commissioned by RAL in 2014 recommends that vegetation monitoring, started in 1990, should be repeated every ten years. Ngāti Rangī recommend baseline monitoring at the start of the concession, then after three years, when the concession is to be renewed. If there is no adverse effect then monitoring should continue after a further seven years when the concession is to be renewed, then every ten years.
7. The application mentions 'smart technology' snowmaking that will reduce energy consumption. Pure Tūroa need to provide more details on what this technology involves and quantify what the energy savings would be.
8. Pure Tūroa will not lower the carpark, or perform any other work that requires substantial earthworks.
9. Pure Tūroa will not develop new tracks for mountain biking.
10. Pure Tūroa will not cover the Mangawhero Stream when constructing a new Clarry's track. We will not let our awa be buried by snow unless this is a natural occurrence. This will affect the mouri of the awa and of Te Waiū-o-te-ika.

11. Pure Tūroa will protect the two alpine flushes. These alpine flushes have high biodiversity and scientific value. They are not the best examples of their kind in the Park, but they are the most accessible. They are mentioned in the Ecological Assessment prepared for RAL. The Tūroa Alpine flush is also mentioned in the Tongariro Park Management Plan (5.2.3.4). This states that if the natural areas of the flush extend beyond the gazetted area the department will extend the boundaries. The first key principle in the Tongariro/Taupō Conservation Management Strategy 2002-2012 is that 'protecting ecosystems from the threats of fire, animal and plant pests will remain high priorities.

The attached letter to the Department of Conservation setting out our response to two works orders lists actions that need to be put in place to preserve the soaks. These include extending the protected areas, no discharge of water into the soaks, protection from silt damage, fencing to keep out hares, regular rubbish removal, and no pushing gravel used for grip in the snow off the carpark.

12. Pure Tūroa must specify exactly the circumstances where they still require aircraft, and where less intrusive drones can be used instead.
13. Pure Tūroa need to provide more detail on their revegetation plan, including locations of off-site nurseries.
14. Pure Tūroa need to pay a levy to Ruapehu District Council towards upgrading their waste water system to one that can cope with the winter overload. Although waste is removed from the National Park, and much of the waste is not even generated on the National Park, it is still activity in the National Park that is affecting our awa and the town infrastructure.

The above mitigations and modifications will require expenditure by Pure Tūroa. We consider that this is appropriate because of the Dual Heritage recognition of Tongariro National Park. The historical and cultural values were an important factor in obtaining Dual Heritage recognition. This has a tangible value in terms of tourism dollars. A paper in the journal *Ecological Economics* (attached) confirms that UNESCO Heritage sites have a tangible value, and this value is more when the cultural connection is live and evolving and not just historical.

This means that Ngāti Rangī are actively adding value to tourism, scientific exploration, innovation, cultural heritage, sport and recreation, protection of indigenous flora and fauna, both on the Maunga and in the town, both of which would benefit the shareholders of Pure Tūroa. It appears fair and equitable that Pure Tūroa can in return provide funds for cultural and environmental monitoring as well as for allowing us to protect and communicate our cultural heritage.

This could have mutual benefits for both parties. According to the PWC economic report on RAL, the company were planning to improve quality of the services they provide rather than increase visitor numbers. This could include services within Ohakune including cultural experiences provided by Ngāti Rangī.

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
Ngāti Rangī Taiao Management Plan	PDF	Environmental Management Plan
Te Mana Paenga	PDF	Conservation Partnership Agreement Pursuant to clause 7.6.2 of the Deed of Settlement
Letter to DOC in response to works approval by RAL and the Lines Company	PDF	Work approval: 1a Movenpick and Parkland upgrades
Paper quantifying benefits of UNESCO cultural heritage	PDF	Drivers of heritage value: A meta-analysis of monetary valuation studies of cultural heritage

How do I submit my objection or submission?

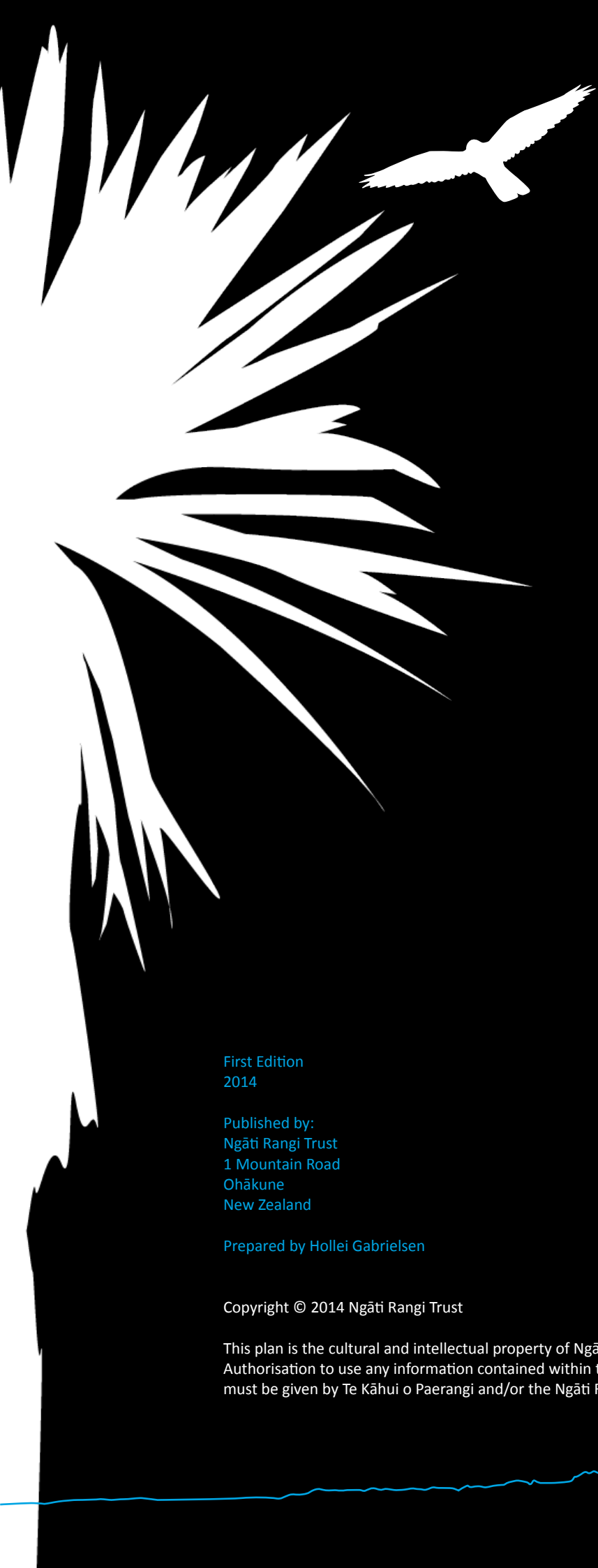
Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



TAIAO MANAGEMENT PLAN

2014

FIRST EDITION 2014



First Edition
2014

Published by:
Ngāti Rangī Trust
1 Mountain Road
Ohākune
New Zealand

Prepared by Hollei Gabrielsen

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TAIAO MANAGEMENT PLAN

2014

MIHI

Matua te kore!

Matua te pō!

Matua te ao!

Inā te oroko tīmatanga o te whenua nei ki tā Ngāti Rangi, otirā Whanganui nui tonu, e mea ana, mai i te hīrautanga ake o Te Ika-a-Maui ka pūpū mai te Kāhui Maunga, ā, ka heke iho a Paerangi (te atua o te Moungaroa) i te manu tipua Te Rau-hā-moa. I te taunga o Paerangi atua ka huri hei tipua, ā, ka mura mai te ahi-kā o Paerangi-i-te-Whare-Toka.

Ko Paerangi-i-te-Whare-Toka te pūtake o Ngāti Rangi, ā, e whakarite ana i tēnei Māhere Taiao kia rite ki te whare pērā ki tō mātau tupuna taketake nei. Nō reira, me pēnei pea ngē te kōrero hei whakatata mai i te pae tawhiti kia mau, kia ita:

*Rukutia ngā pou tāuhu o te whare nei
Rukutia ngā pou pou o te whare*

Rukutia ngā tukutuku o te whare

Rukutia! Rukutia kia ū, kia mau

Kei tae mai a te anu-matao ki roto i a koe e

Kia ninihi atu ai a ua-whatu, a ua-nganga

*Kei whakapā mai hoki a Haunui, a Hauroa, a
Tawhirimātea*

Tāku hoki i pai ai nō roto i a Tāne

E tū nei i:

Ko Mahana

Ko Pū-mahana

Ko Werawera

Ko Kohakoha

Pea tangata mō roto i a Tāne e tū nei

Hara mai te toki

Haumi e

Hui e

Tāiki e

ACKNOWLEDGEMENTS

Many hands have worked to build the Ngāti Rangi Taiao Management Plan, and thanks is owed to all of them. Firstly, to the iwi members who attended workshops and discussed a myriad of issues, putting forth ideas, solutions and aspirations, tēnā koutou. You provided the wood for the whare, the raupō for the panels, and the thatching for the roof. Thank you to Hollei Gabrielsen who took that wood, that raupō, that thatching and put it all together. It was a long and hard job, but you worked until the whare was finished. Then there were those of you who appraised the whare, and guided Hollei in where a pou needed strengthening, or a tukutuku more stitching. Your words have made the whare all the more resilient. To our tamariki who decorated the whare with their vibrant colours and illustrations of our taiao, thank you all. Finally, to those of you who will warm the whare, and use it – thank you. We trust you will enjoy what we have built, and that it will provide a shelter for you as we strive for our vision – a vibrant Ngāti Rangi that continues to exist in a 1000 years. Mauri ora!

Hannah Rainforth

*Pou Taiao
Ngāti Rangi Trust*

Acknowledgement from Te Kāhui o Paerangi Chair

I'd like to acknowledge all the work and contributions by all to complete our Environmental Management Plan. It captures our thoughts, our relationship and our interaction with our environment.

WORDS FROM THE CHAIR

The completion of Ngāti Rangī's Environmental Plan marks a significant milestone for the tribe. The Plan is an accumulation of thoughts, dreams, discussions and reactions to issues facing us in our roles and responsibilities as tangata whenua. We hold the expectation that our words will provide others with an understanding of us as a people, what we value, and the importance of our relationship with our taiao.

Our principal role as tāngata tiaki over our taiao was a responsibility handed to us by our tūpuna, and therefore a responsibility we hand on to our tamariki and mokopuna. Our document perhaps could be viewed as a challenge – a challenge to all users of our environment to hold some responsibility in their actions, their choices, and to be attentive to our special place in the world.

Consequently, this document is first and foremost for our people, a living document to aid in addressing the issues they have expressed. And secondly, for the managers of the environment to understand further our relationship with the taiao, what we deem to be culturally inappropriate activities, and those activities and actions that enhance and benefit our taiao.

Kemp Dryden

Chair

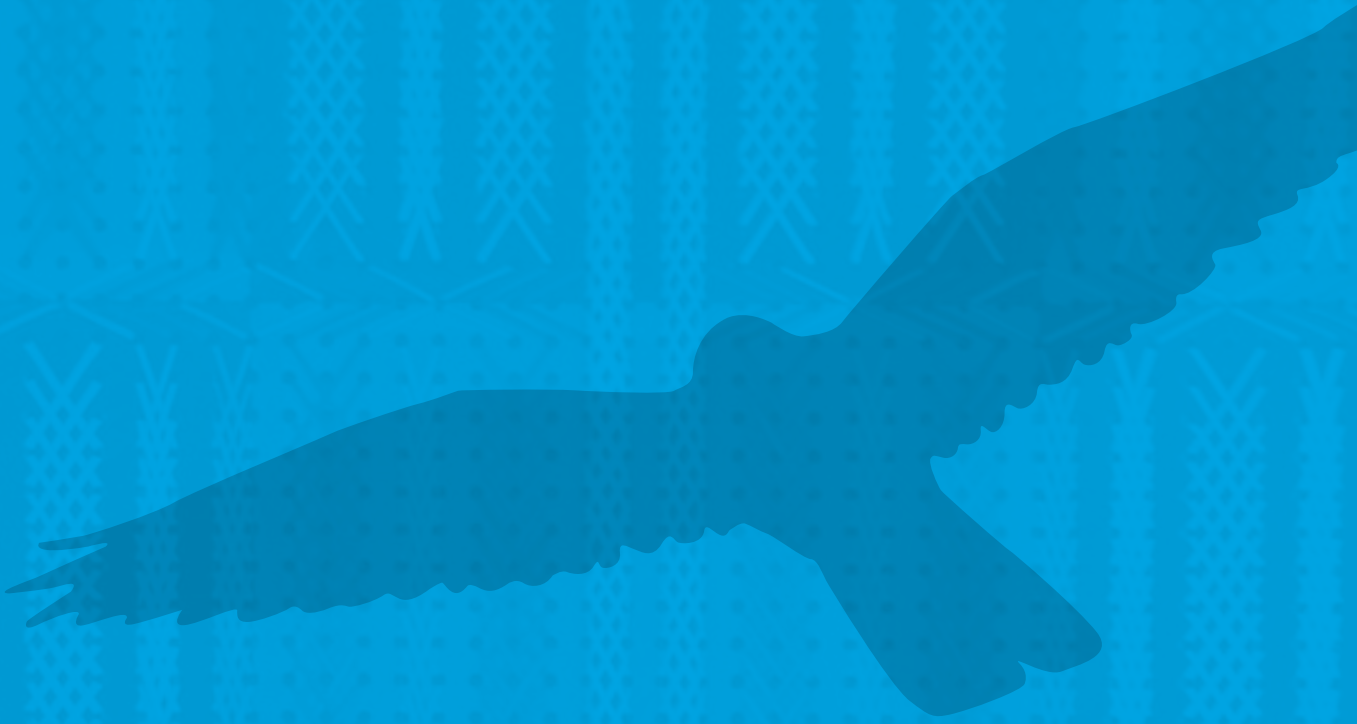
Ngāti Rangī Trust

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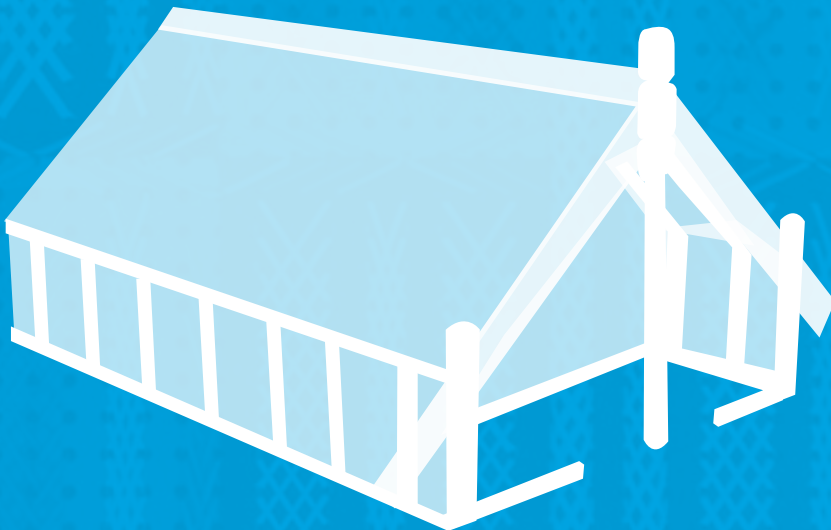
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TE HANGA WHARE



TE HANGA WHARE – INTRODUCTION

FRAMEWORK

The framework of our Taiao Management Plan is based on the structure of a whare. The utilisation of the whare to structure the plan is likened to our eponymous ancestor Paerangi-i-te-Whare-Toka and his House of Stone. Using this analogy allows Ngāti Rangi to have a strong conceptual base to develop our Taiao Management Plan.

This framework allows non-uri to gain a thorough understanding of Ngāti Rangi. The plan offers an invitation for people to enter the house of Ngāti Rangi, to view our tikanga and to understand our thoughts, viewpoints and responsibilities. For our own uri, it is an articulation of who we are as descendants of the House of Stone.

Our plan is divided into five sections: these emulate the different structural components of a whare.



Winner of the Taiao Management Plan art competition, Shauntae Karipa.

SECTION 1: TE RORO WHARE – THE VERANDAH OF THE HOUSE

Te Roro Whare is likened to a kuia and her role as the reo pōwhiri (or welcoming voice) for all manuhiri who enter the whare. The kuia sets the foundations for a pōwhiri; with regards to our plan, this refers to the outline, purpose, overall vision and the desired outcomes we seek.

SECTION 2: TE TATAU – THE ENTRANCEWAY

Te Tatau sets the scene for Ngāti Rangi as an iwi. It is the gateway into our whare and into a Ngāti Rangi worldview so

that all who walk through Te Tatau gain an understanding of us as an iwi. It depicts who we are, and the values and guiding principles we hold to. Again, for us as uri, it reaffirms who we are and what we believe.

SECTION 3: NGĀ POU O TE WHARE – THE PILLARS OF THE HOUSE

This section is the central element of our plan. The pou of the whare – the pillars of the house – are structurally important as the key element in the stability and support of a sound building. Without these pillars the whare will crumble. For this document, our pou are the atua. Ngāti Rangi have decided to utilise the atua to formulate our perspectives on issues relating to Ngāti Rangi and the care and management of the taiao within our tribal boundaries. Utilising the atua as our pou for this document aids in our interaction not only with the atua, but also our kaitiaki and tūpuna. We view ourselves as a reflection of the universe; therefore using this as a base to structure this section helps us to aspire to the beauty, brilliance and ultimately the purity of the atua. Ngā Pou refers to the key components that have been selected by the iwi as reference points and groupings for this mahi. Under each pou, our issues, objectives, policies and rules have been outlined. Where possible, rules have been developed for all issues under each pou. However, not every issue can be developed into a rule enforceable by Ngāti Rangi. In these circumstances, the reader should refer to the objectives and policies. The pou in this document are ordered in terms of their whakapapa, and are outlined below.



Artwork by Uenuku Ponga

Ranginui

Ranginui governs our skies and is ultimately the backdrop of our vistas. He stands higher than the peaks of Matua te Mana (Ruapehu) and his presence is seen and felt throughout the universe.

Papa-tū-ā-nuku

Papa-tū-ā-nuku is our ultimate mother, the mother of all things; she is planet earth. Her fertility and life force is a constant gift that sustains us.

Tāne-nui-a-rangi

As overlord of the ngahere, Tāne-nui-a-rangi (or Tāne Mahuta) is a significant ancestor of Ngāti Rangi. He governs the realm of the forest and all the indigenous plants and creatures that dwell within.

Tangaroa-i-te-wai-māori

The waters of Tangaroa-i-te-wai-māori are the bloodlines of Papa-tū-ā-nuku. These waters flow along her slopes and nourish Ngāti Rangi not only with a constant supply of mouri, but with kai and freshwater.

Rongomātāne

Rongomātāne governs the realm of cultivated foods, which is a major activity in our region.

Rūaumoko

Rūaumoko is the youngest child of Rangi and Papa; he was clutched to Papa's breast during the separation of Rangi and Papa. Earthquakes and volcanic activity are a result of Rūaumoko and his movements within the earth.

Matua te Mana

Otherwise known as Ruapehu, Matua te Mana is central to the cultural and spiritual identity of Ngāti Rangi. He is the stronghold for Ngāti Rangi, is beloved among his people and is referred to by uri as Koro Ruapehu, the tribal grandfather.

The different pou used to categorise our issues are interlinked not only because they are our whanaunga, but because impacts that occur in one area also impact on other areas of the environment, and ultimately on us as an iwi. The issues we have identified under each pou do not reflect the entirety of our concerns but do serve to outline our approaches in caring for our environment, and our responsibility to ensure it endures for a thousand years and more.

SECTION 4: NGĀ HEKE KŌRERO – RAFTERS

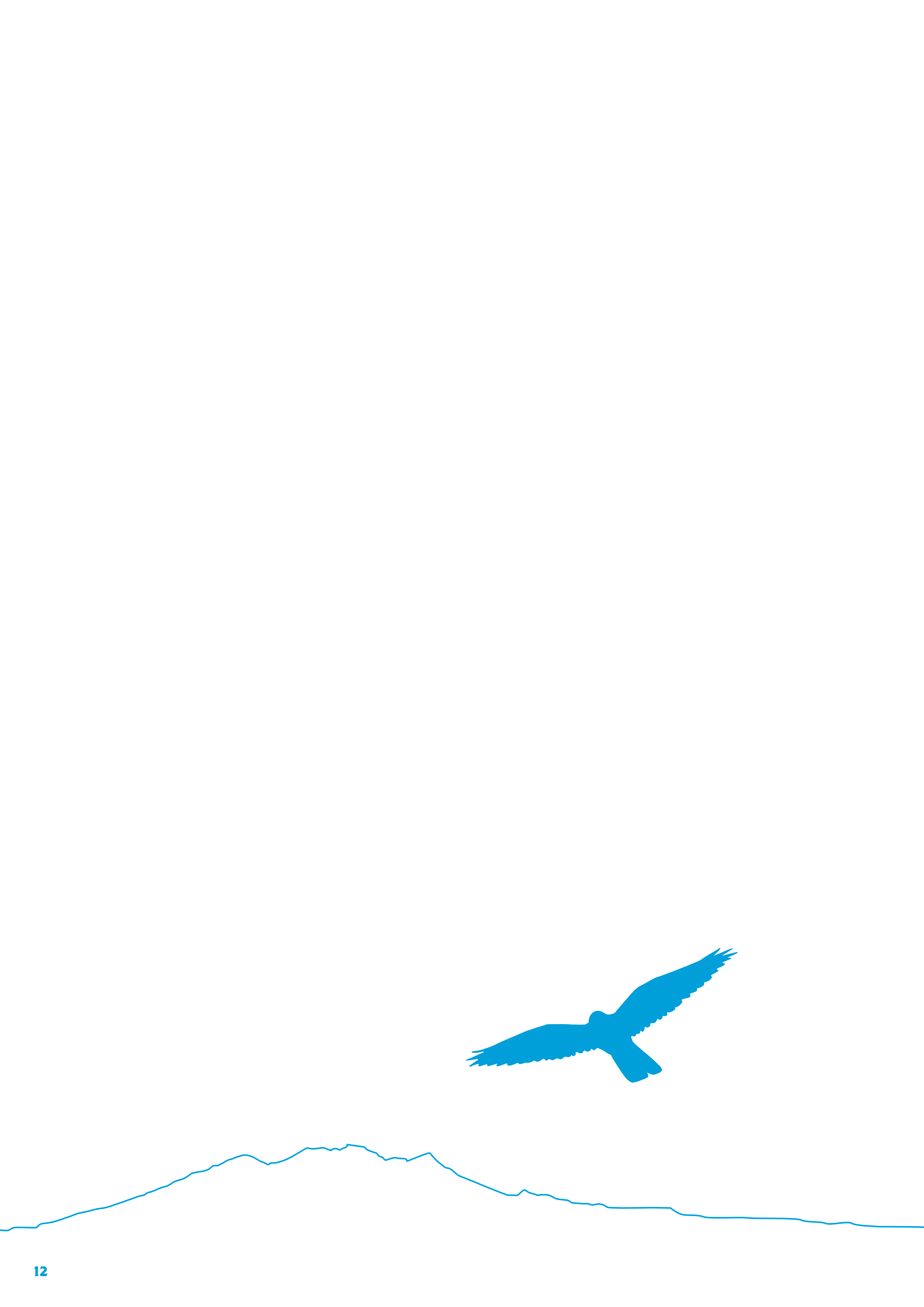
Ngā Heke Kōrero outlines the process of making a submission, as a guide for individual hapū and whānau members of Ngāti Rangi should they wish to prepare their own submissions on issues.

SECTION 5: TE PANI KŌKŌWAI – THE FINAL TOUCHES

Te Pani Kōkōwai are the final statements of Ngāti Rangi to conclude the document. In terms of our whare analogy, Te Pani Kōkōwai are the final touches on the whare, whether it be the paint or varnish, that ensure the structure is protected from deterioration.



Artwork by Tahatika Te Riaki





**SECTION 1:
TE RORO WHARE
– THE VERANDAH
OF THE HOUSE**

SECTION 1: TE RORO WHARE THE VERANDAH OF THE HOUSE

PŪTAKE – PURPOSE

The purpose for this management plan is to provide clarity and structure to the Ngāti Rangī approach to environmental management. Ultimately it provides a framework by which Ngāti Rangī can actively fulfil our role as tāngata tiaki. This plan is viewed as a living document, adaptable to the changing conditions of the environmental management sector, while holding to our principles of care, connectedness and responsibility. It will provide Ngāti Rangī with an avenue for continued participation in the resource consent process and involvement in the wider environmental policy and planning arena.

Under the Resource Management Act (sections 61, 66, and 74) local authorities must recognise iwi planning documents that are endorsed by iwi authorities when preparing or altering regional policy statements, regional plans and district plans. This Taiao Management Plan is Ngāti Rangī's iwi environmental management plan. It has been endorsed by the Ngāti Rangī Trust (our iwi authority) and Te Kāhui o Paerangi (our iwi rūnanga). As well as providing clarity and structure for ourselves as Ngāti Rangī, local councils will be able to use the plan to guide their alterations or development of district and regional plans and statements so that Ngāti Rangī values can be properly recognised and honoured in this place.

‘Kia mura ai te ora o Ngāti Rangī ki tua o te 1,000 tau

Ngāti Rangī continues to vibrantly exist in 1,000 years’

WHAINGA MATUA – OUTCOME

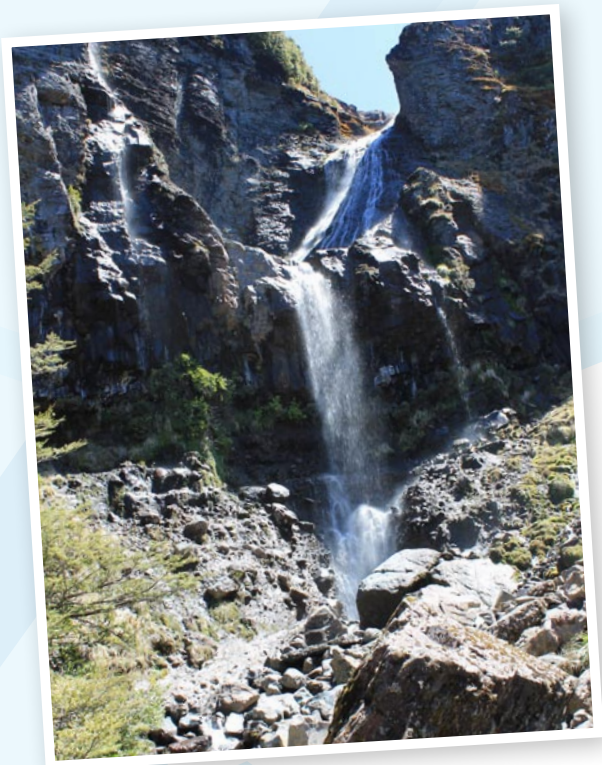
The desired outcome resulting from the creation of this plan is to capture and detail some of the Ngāti Rangī whakaaro about and approaches to caring for our environment, so that these can then be properly taken into account during decision making processes such as resource consent applications and concession applications. It also provides a direction for where Ngāti Rangī would like to go in terms of improvements to practices relating to the environment and its management. Some kaupapa are aspirational, and will require time to be fulfilled.

PAE TAWHITI – VISION STATEMENT

We as Ngāti Rangī iwi, hapū, whānau and individuals will live in a way that we and the world around us vibrantly exists in a thousand years. In order for Ngāti Rangī to be a flourishing tribal nation throughout and beyond the next millennium, the connections that exist with the natural world need to be strengthened. We can do this by: reconnecting with our whānau, hapū and wider iwi groupings; revitalising our connections with our natural world through talking with and listening to our waterways, ngahere, whenua and maunga; and playing an active role in the protection of the taiao.

ARA WHAKATUTUKI – APPROACH

To realise the vision statement, Ngāti Rangī wish to ensure that the environment is cared for in a way that ensures our descendants can enjoy the fruits of the atua as our tūpuna did. The approach aims to address all the different perspectives of Ngāti Rangī whilst ensuring that the main objective of active involvement and protection of our natural world is undertaken.



Waitonga Falls, Ruapehu

This is an iwi environmental management plan based on Ngāti Rangī values and principles. It is a collection of thoughts and perspectives that are a living embodiment of the connections that exist between Ngāti Rangī and the natural world. With this in mind, consultation with Ngāti Rangī is still required for any type of impact on our natural world – this document is not a replacement for face to face dialogue between applicants and the iwi.

TIKANGA TĀTARI – REVIEW PERIOD

Minor updates to the plan will be made biennially through an electronic version, which will be loaded to the Ngāti Rangī Trust website. A full review will be completed every 5 years.

MĀ WAI HEI WHAKATUTUKI – ROLES AND RESPONSIBILITIES

Ngāti Rangī Trust are the administrators of this plan. Any questions, queries or interpretation regarding this plan should be directed to the Ngāti Rangī Trust Office.

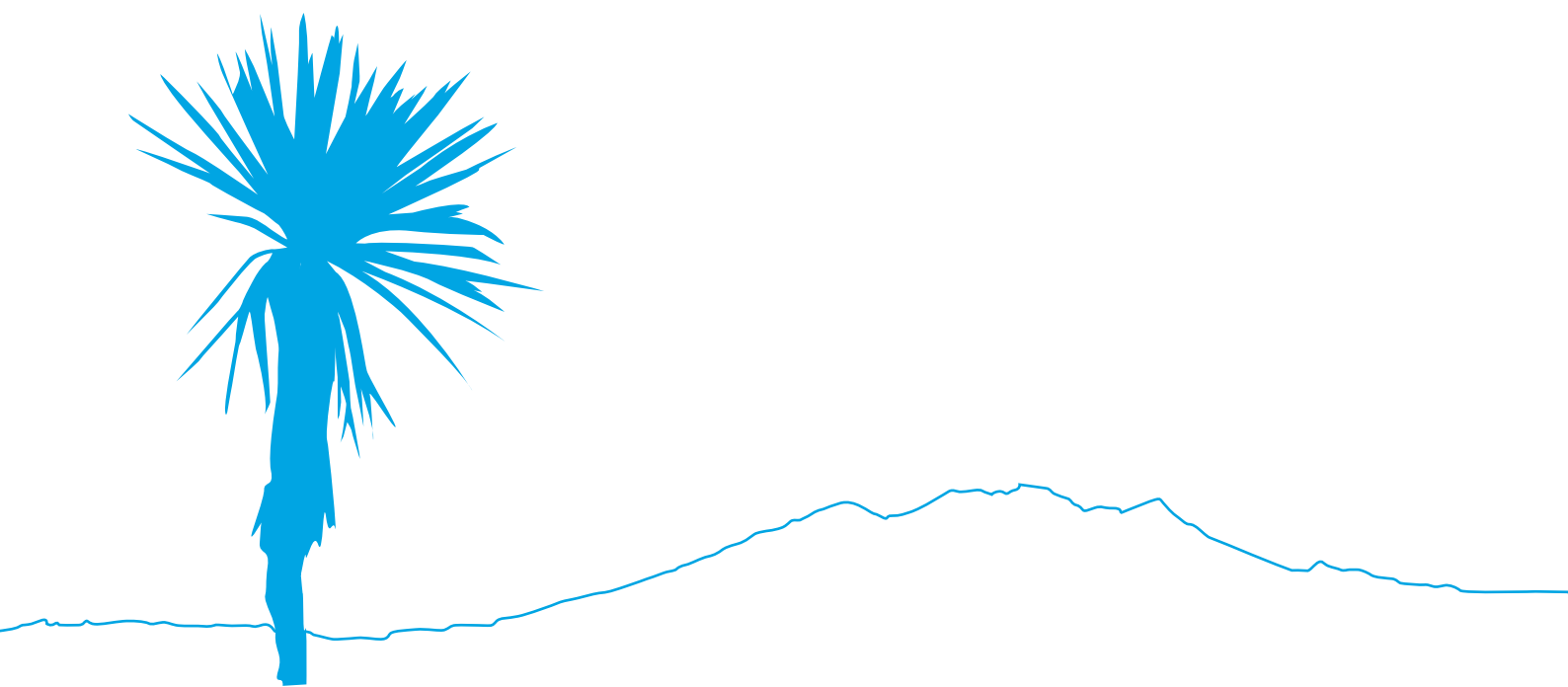
TE HONO KI NGĀTI RANGI – ENGAGEMENT WITH NGĀTI RANGI

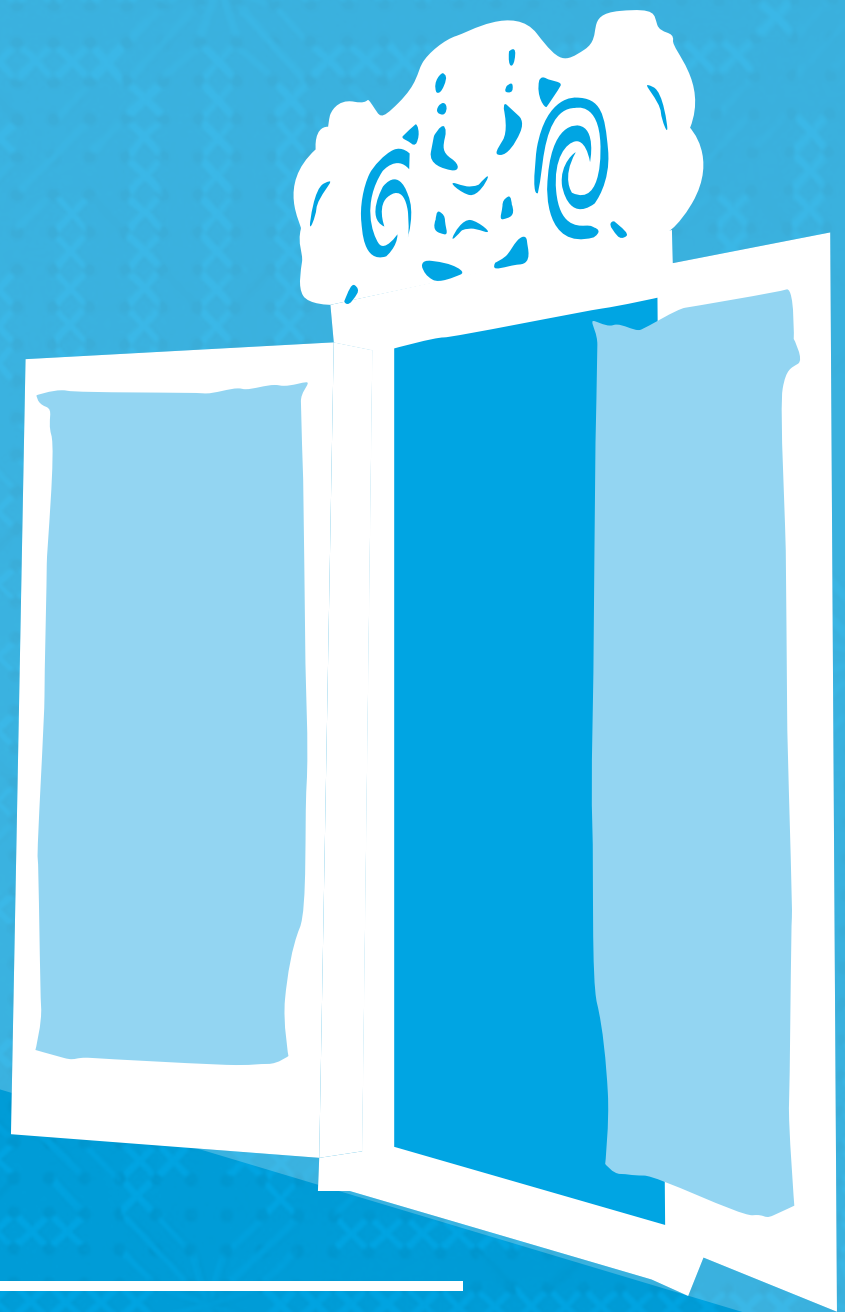
Early and full consultation with Ngāti Rangī on activities relating to any proposed use of our environment is an essential element within our environmental management. We welcome early engagement with applicants to ensure all matters concerning actual and potential environmental and cultural impacts are resolved prior to the lodging of a consent. This can avoid time and consumption of resources for both parties if we work collaboratively and in partnership through early and timely discussions. It can allow consent holders and Ngāti Rangī to work together through the consents process towards an outcome desired by both parties.

The guiding principles and values outlined in this plan outline what is important to Ngāti Rangī and what guides the decisions we make when responding to applications.



Rangataua-nui, Ohākune Lakes Reserve





SECTION 2:
TE TATAU
– THE ENTRANCEWAY

SECTION 2: TE TATAU THE ENTRANCEWAY

KO WAI MĀTOU – IWI DESCRIPTION

Ko Ruapehu te maunga

Ko Ngā Turi-o-Murimotu te taumata tapu

Ko Whangaehu te awa

Ko Ngāti Rangi te iwi

Ko Paerangi te tupuna

Ngāti Rangi is a founding iwi of the Whanganui confederation of tribes. Ngāti Rangi descends from the eponymous ancestor, Paerangi-i-te-Whare-Toka and has occupied the southern region of Te Kāhui Maunga since before the arrival of Aotea, Tainui and Te Arawa. There are approximately 8,000 uri and 10% are estimated to be living in the rohe with another 30% living in the Whanganui region.

There are 16 marae in the Ngāti Rangi rohe, and most are affiliated to the Ngāti Rangi rūnanga. Some of these marae have dual affiliations to both Ngāti Rangi hapū and other hapū in the Whanganui confederation of tribes.

The common founding ancestor of Ngāti Rangi is **Paerangi-i-te-Whare-Toka** (also known as Paerangi or Paerangi-o-te-Moungaroa), from where the name Rangi is taken (**Paerangi**). Paerangi's mana whenua passed down to **Taiwiri** (including her three principal children: Rangituhia, Rangiteauria and Uenukumanawawiri) and her two siblings **Ururangi** and **Tāmuringa**.

NGĀ TONGI – IWI BOUNDARIES

Our iwi boundaries are described by the following and depicted in the map in Figure 1.

Mai i Paretetaitonga ki te ūranga mai o te rā ki Te Roro-o-Taiteariki, mai i Te Roro-o-Taiteariki ki Moawhango-iti, mai Moawhango-iti rere whakatetonga ki Namunui. Mai Namunui ki Tiri-raukawa whiti atu ki Pohonui-a-Tāne ki Maungakāretu. Mai Maungakāretu ki Raukawa, mai Raukawa ki Waipuna, ko ngā pari kārangaranga o te uru tēnā. Mai Waipuna mārakiraki te topa atu ki Moturoa, Moturoa ki Te Kōhatu kia pae ake anō ki te pū ki Paretetaitonga, ko Ngāti Rangi te tū mai nei.

IWI LINKS

Ngāti Rangi links through whakapapa to our neighbouring iwi. Supporting our relationships with our whanaunga iwi is important for maintaining stability in our environment and a collective response to issues. This is crucial for the health of our maunga and our awa.

TE ROHE O NGĀTI RANGI

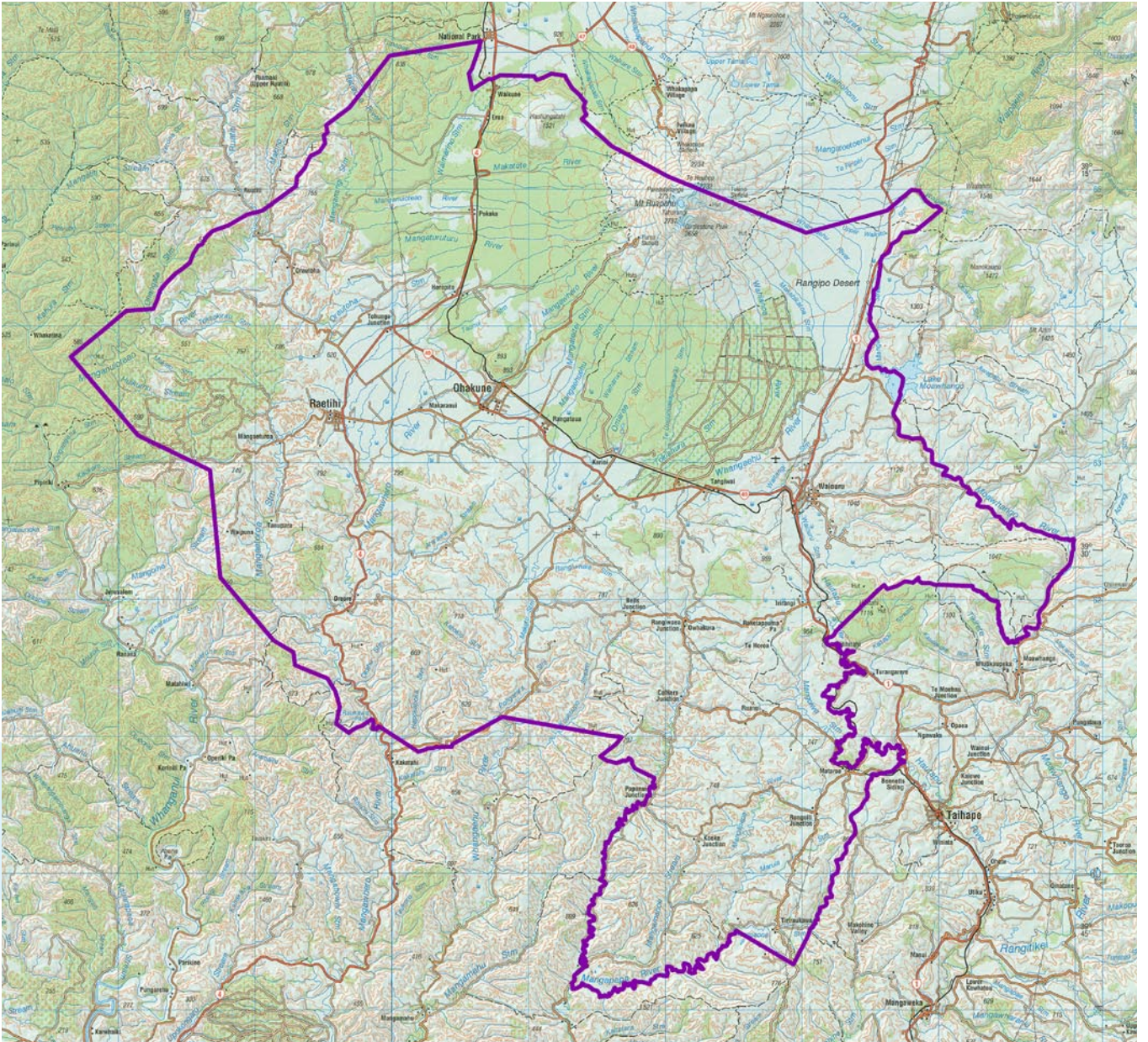


Figure 1: The Ngāti Rangī boundaries

TIKANGA WHAKATUTUKI – GUIDING PRINCIPLES

Ngāti Rangi links through whakapapa to our neighbouring iwi. Supporting our relationships with our whanaunga iwi is important for maintaining stability in our environment and a collective response to issues. This is crucial for the health of our maunga and our awa.



Te Mōkai a Rangataua, or Rangataua Pet, is a common local orographic cloud formation. Photo: Korty Wilson

‘So keeping that long term vision in how we live our lives can help us with the decisions we make.’

Hannah Rainforth

Table 1. Ngā Tikanga Whakatutuki mō Ngāti Rangi – Ngāti Rangi Values and Principles

NGĀ TIKANGA WHAKATUTUKI MŌ NGĀTI RANGI – NGĀTI RANGI VALUES AND PRINCIPLES

PRINCIPLES
<p>Ko te Kāhui Maunga te mātāpuna o te ora <i>We understand that the Kāhui Maunga is the source of our origin and well-being of Ngāti Rangi</i></p> <p>Me karioi te noho <i>We understand that we, as Ngāti Rangi, are here forever</i></p> <p>Kia mana ai ngā kōrero tuku iho <i>We understand that the teachings of our tupuna are upheld</i></p> <p>Ko te anga whakamua ki āpōpō <i>We understand that decisions must be future focused</i></p>
VALUES
<p>Kia MANA ai ngā mahi <i>To act with integrity and honour</i></p> <p>Kia mau ai ki te MANAAKITANGA <i>To care wholeheartedly</i></p> <p>Kia tika ai tō TŪRANGAWAEWAE <i>To be accountable</i></p> <p>Kia ū ki ngā TIKANGA <i>To be duty bound</i></p> <p>Kia rapu ai i te MEA NGARO <i>To unleash potential</i></p>



**SECTION 3:
NGĀ POU O TE WHARE
– PILLARS OF THE HOUSE**

SECTION 3: NGĀ POU O TE WHARE

THE PILLARS OF THE HOUSE

1. TE POU TUATAHI: RANGINUI

“... Ka rongo au ko Rangitaiki, Rangi-kimihia, Rui-ngā-rangi, Tuhi-ngā-rangi, Rangi-whakatekateka. Ehara hoki rā i te rangi hanga noa. Kei a rangi tohe atu, ka totohe tonu au e te iwi, ki te hura i te riu o te Punga-o-ngā-rangi. E rongo koe i a Rangi-ka-pakē, i a Rangi-ka-haruru, Rangi-tū-mua, tū-mai, tū-tahi, tū-hapa-hāpainga, kia rewa ki runga ki a Tūnuiārangi, Rangi-hiwi-nui, hiwi ake ki uta e te iwi e.”

Ranginui is significant to our iwi; it was he who established Matua te Mana to calm Te Ika-a-Māui. The quality of the air at ground level and also atmospheric pollution are indicators of the health of Ranginui. Human activities impact on his health; climate change and air pollution are two key examples of this. Connected to and reliant on Ranginui as we are, when his health is impacted, so is ours. The realm of Tāwhirimātea is also included in this chapter with regards to renewable energy production such as wind farms, as Tāwhirimātea resides with his father Ranginui in the space above Papa.

This section will cover issues such as climate change, air pollution and the production of energy. These issues are not the sole concerns of Ngāti Rangi but have been condensed into these three sections for ease of reading.

NGĀ TAKE – ISSUES

1.1 CLIMATE CHANGE

Climate change has very real direct and indirect impacts on Ngāti Rangi and the environment in our region. The potential impact through rising temperatures, climate variation, weather event intensities and unpredictability creates increased pressure on our waterways, ngahere, maunga, native species and also on us as people.

‘We should have a stance [on climate change]. We should be worried about it. Why? Because we want to save the environment – we want to save things for the future generations.’

Novena McGuckin

1.2 AIR POLLUTION

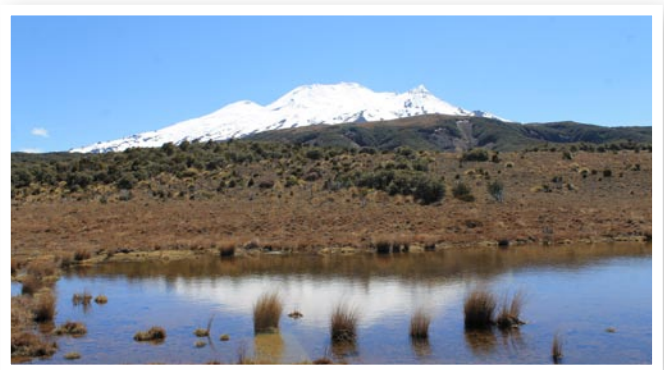
Industrial, vehicular and domestic sources contribute to air pollution within Ngāti Rangi tribal lands. During winter, household fireplaces contribute to poor air quality, which impacts on individual and whānau health and quality of life.

1.3 ENERGY PRODUCTION

The potential impacts resulting from the establishment of wind farms in this area are of concern to Ngāti Rangi. Issues include sedimentation from access roads, disruption or destruction of native trees and animals, and impacts on significant sites and wāhi tapu.

NGĀ WHĀINGA – OBJECTIVES

- The Ngāti Rangi and wider regional contribution to climate change is reduced.
- The air quality within our region is no longer affected by the consumption of fossil fuels, the use of inefficient wood burners or other sources of air pollution.
- Clean, renewable energy is harnessed in a way that does not impact on the environmental, cultural, visual and spiritual connections Ngāti Rangi have with Ranginui, our whenua and waterways.



Koro viewed from Rotokawau wetland on the Waitonga Falls track.

KAUPAPA TOHU – POLICIES

CLIMATE CHANGE

- 1.1.1 Ngāti Rangī commits to becoming carbon neutral.
- 1.1.2 Ngāti Rangī supports New Zealand reducing climate change emissions to safe levels.
- 1.1.3 Ngāti Rangī will advocate for electric vehicle use and the development of infrastructure to support electric vehicles.
- 1.1.4 Ngāti Rangī will actively support cycling and walking, and infrastructure to support this.
- 1.1.5 Ngāti Rangī will support initiatives by primary industry to reduce greenhouse gas emissions, and sequester carbon.
- 1.1.6 The iwi will support and encourage academic research regarding the impacts of climate change on the glaciers on Ruapehu.
- 1.1.7 Ngāti Rangī encourages the development of a plan by local government to address the potential for increased drought and intensity of weather events resulting from climate change. The plan should explore resilience measures such as wetland restoration and local water capture and storage. It should be noted however that Ngāti Rangī does not necessarily support large water capture infrastructure.

Air Pollution

- 1.2.1 Ngāti Rangī does not support air emissions within our region that cause any effects on Ranginui, our air quality or the health and wellbeing of our people.
- 1.2.2 The rohe should move towards clean, sustainable living. Ngāti Rangī wish to work with national and local government and the private sector to achieve this through:
 - a. securing efficient home heating options to improve the ambient air quality during winter;
 - b. ensuring 100% of all homes within the Ngāti Rangī region are insulated;
 - c. encouraging and supporting sustainable low impact energy sources, eg solar and wind energy;
 - d. investigating opportunities around sustainable low impact local micro-power generation schemes that provide benefits to local communities and individuals; and
 - e. phasing in appropriate objectives, policies and rules.
- 1.2.3 Please note that Climate Change Policies 1.1.3 and

1.1.4 also apply to the reduction of Air Pollution.

Energy Production

1.3.1 Ngāti Rangī will consider new energy production proposals (eg wind farm projects) within the rohe. These will be dealt with on a case-by-case basis. Potential developments will not however:

- a. interfere with the visual connections Ngāti Rangī has with the landscape;
- b. impact on any wāhi tapu and culturally significant sites and areas;
- c. impact on river flows;
- d. impact on flora and fauna; or
- e. occur on any unmodified landscape.

NGĀ TURE – RULES RANGINUI

Climate Change 1.1.2.1

Actions to reduce climate change, and to prepare for and mitigate its impacts will be supported.

Air Pollution 1.2.1.1

No new or renewed consent will be issued that results in air pollution.



Artwork by Ebony-Fair Thomas

2. TE POU TUARUA: **PAPA-TŪ-Ā-NUKU**

*“Awhi-nuku, awhi-rangi, awhi-papa, awhi-taua,
awhi-kerekere*

Tupu te weri, toro te aka

*Tū-awhitia-te-nuku! Tū-awhitia-te-rangi! Tū-āpiti!
Tū-aropaki!”*

The health of Papa-tū-ā-nuku, our eternal mother, is central to our health and wellbeing as humanity. She is the ultimate provider; we depend on her fertility and her gifts for survival. Ngāti Rangi is concerned about the unsustainable use and exploitation of Papa-tū-ā-nuku and her gifts. As tāngata tiaki we are duty bound to ensure care and reciprocity is actioned.

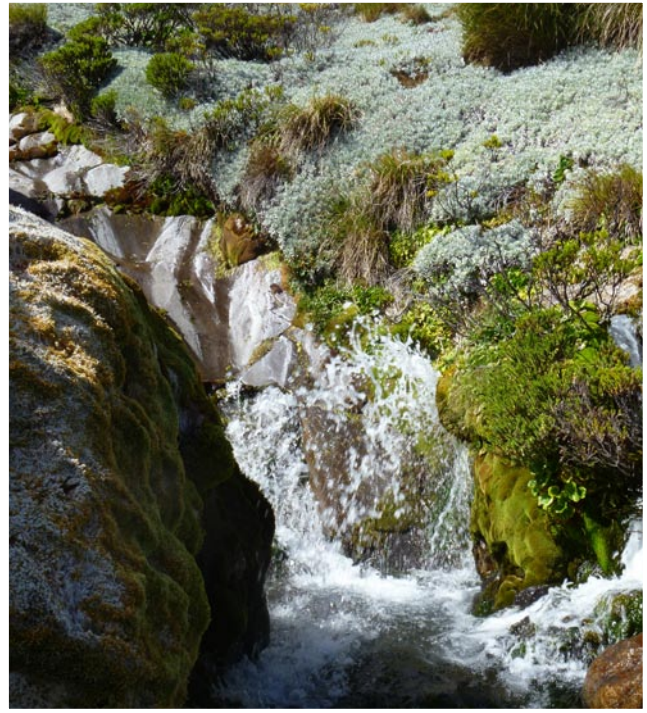
This section covers issues such as mining, subdivision, road works, soil contamination, erosion and sedimentation, land use, and waste management. These issues are based on how the whenua is used and managed and the pollution and waste that accompanies these issues. The issues identified are not the sole concerns of Ngāti Rangi; other issues may include:

- Live firing exercises
- Activity on Te One Tapu (Rangipō Desert)

‘The land needs to be healthier in a thousand years than it is now.

We need to give back more than we take, talk and listen to the land.’

Hannah Rainforth



An alpine flush on Ruapehu.

NGĀ TAKE – ISSUES

2.1 MINING AND QUARRYING

Mining is detrimental to the environment and destroys habitats. It is near impossible to restore mined sites fully. Ngāti Rangi considers that it is an activity that leaves a scar on Papa-tū-ā-nuku and depletes her gifts. Wastes resulting from mineral extraction are often toxic and dangerous to the environment. Some products of mining (eg fossil fuels) result in other critical environmental issues such as climate change. The extraction of gravel from our waterways and streambeds is also an issue for Ngāti Rangi.

2.2 SUBDIVISION AND DEVELOPMENT

Increased population density and structures associated with subdivision places extra pressure on the region’s waterways and water supply. This can cause an increase in contaminants entering waterbodies through storm water systems, as well an increase in abstraction pressure. Subdivision can result in an increase in pest species and can put local native flora and fauna at risk. It can also mean vegetation clearance, and an alteration of the natural drainage characteristics. There may be visual and landscape changes also. Subdivision in particular areas may be culturally inappropriate.

2.3 ROAD WORKS AND EARTH WORKS

Inadequate management of road construction and works can allow sediment to enter waterways. The maintenance and construction of roads in our region can encourage weed migration, noise, dust, vegetation clearance, vibration, stream diversion and water extraction from local rivers and streams for settling dust issues.

2.4 SOIL CONTAMINATION

Contamination of the soil occurs through a variety of avenues such as industrial operations, cropping, pastoral farming, household discharges, solid waste plants, use of agrichemicals and fertilisers, and sewage disposal. Soil contamination poses a threat to soil health, productivity, and the health of Ngāti Rangī, the local community and the environment.

2.5 EROSION AND SEDIMENTATION

Some land uses in vulnerable areas are causing erosion and ultimately leading to sediment entering waterways and a loss of soil productivity.

2.6 LAND USE

Lands in the Ngāti Rangī tribal area incorporate a number of differing land use activities, such as forestry, agriculture, horticulture, and residential use. Many of these have improved in their environmental awareness and practices over the last decade, however, some associated practices still contribute to a number of environmental issues experienced locally, such as algae and weed growth, soil loss, and stream sedimentation. Land Use Capability Classifications categorise land according to the underlying rock type, soil type, slope, erosion susceptibility and vegetation, and give a score of 1 to 8 as to what that land can be safely and practically used for. Basically, land use that is inappropriate for the Land Use Capability Classification results in environmental and safety issues.

2.7 WASTE

Waste accumulation is an issue. The use of plastic and polystyrene packaging is increasing. While some of this is recyclable, much of it ends up in landfills, taking up land space with rubbish. Rubbish tips also contain materials that can form leachate, potentially polluting waterways and contaminating the soil. Many waste products have a long life span that take time to break down or will not break down at all. Using Papa-tū-ā-nuku as a dumping ground for waste is an issue for Ngāti Rangī, and contrary to our values around caring for Papa. Likewise, wasteful use of resources through over-packaging, short life-time design or excess use of non-biodegradable material conflicts with our values.



Artwork by Taurimatanga Ponga

‘Working towards sustainable living and for Ngāti Rangī to be an example of that.’

Keith Wood

NGĀ WHĀINGA – OBJECTIVES

- Mining is prohibited in the Ngāti Rangi rohe unless it is categorically proven that there will be no effects, minor or otherwise, short or long term, including through the use of the products of the mining activity.
- Subdivision is undertaken in a controlled manner that avoids all risks to the environment and protects culturally significant areas.
- Roads, road construction and road maintenance are managed to prevent run-off entering waterways. For example, sediment traps, treatment wetlands and retention areas are utilised.
- Only local material will be used for roading, to prevent weed spread.
- Roading vehicles external to the region will undergo a full biosecurity clean before entering the rohe.
- Vegetation clearance will only occur with prior Ngāti Rangi approval.
- Stream use for dust treatment will be discussed with Ngāti Rangi before approval.
- Relevant authorities will work with Ngāti Rangi to compile a register of contaminated sites in our rohe for iwi reference. Relevant authorities will actively work to eliminate sources of soil contamination in our rohe. Contaminated soil will be rehabilitated.
- Land is used and managed in a way that is appropriate to its Land Use Capability Classification.
- Waste is reduced and prevented.

‘It’s a desecration of Papa-tū-ā-nuku. Here is Papa-tū-ā-nuku who feeds us, who looks after us, who clothes us and what do we do? Throw in as many bottles as we can. No, as many explosives as we can.’

Novena McGuckin

KAUPAPA TOHU – POLICY

MINING AND QUARRYING

2.1.1 No prospecting, exploration and extraction of minerals, coal or petroleum is to be conducted in Ngāti Rangi tribal lands as this is inconsistent with Ngāti Rangi values and principles.

2.1.2 Notwithstanding policy (i) above, Ngāti Rangi may consider potential small scale mining activities with proven low environmental impacts on a case-by-case basis.

2.1.3 If any mining projects are approved by Ngāti Rangi, adequate funding for full ecological restoration post mining shall be put aside in a secure and independent facility prior to the commencement of work.

2.1.4 No gravel extraction will be undertaken in-stream or within the 10 year flood zone. Any gravel extraction undertaken will be conducted in a way that avoids adverse effects on the environment and:

- a. does not occur in any unmodified area;
- b. does not occur in an area of environmental and cultural significance to Ngāti Rangi; and
- c. has no impact on native fish, their habitat, migration or spawning.

SUBDIVISION AND DEVELOPMENT

2.2.1 All subdivision and development requires adequate consultation with Ngāti Rangi.

2.2.2 Subdivision or development will not put at risk culturally significant areas, or native flora and fauna.

2.2.3 All new subdivision will ensure that an Accidental Discovery Protocol is adhered to. This is to ensure that the potential unearthing of archaeological material is protected. The conditions in this protocol must include the following:

- a. Ngāti Rangi be contacted immediately;
- b. work will cease until permission is given by Ngāti Rangi; and
- c. an archaeological assessment will be undertaken by an archaeologist approved by Ngāti Rangi.



Artwork by Heleena Kaire

2.2.4 Town planning within our region must ensure that new subdivisions or development include the following:

- a. <10% impervious surface across the properties and supporting infrastructure;
- b. storm water treatment facilities, eg treatment wetlands;
- c. no new piping of streams, and daylighting of existing piped streams;
- d. fish passage on any new culverts or in-stream structures;
- e. adequate community greenspace/openspace;
- f. adequate provision of pedestrian and cycle routes;
- g. inclusion of electric vehicle charging stations, if new fuel stations are included as part of the development;
- h. roading design to promote community connectivity, eg few to nil cul-de-sacs;
- i. twilight clauses on cats;
- j. promotion of avian aversion for dogs.

2.2.5 Future housing development projects will promote sustainable living and be in line with but not limited to the following attributes:

- a. be self-sufficient;
- b. be built with sustainable materials;
- c. have low to nil environmental impact;
- d. generate own power;
- e. have water storage facilities;
- f. have water recycling; and/or
- g. have composting toilets where this is beneficial.

Where possible, renovations will also follow these principles.

ROAD WORKS AND EARTH WORKS

2.3.1 Road works and earth works will utilise appropriate mitigation measures to ensure:

- a. no sediment enters adjacent waterways; and
- b. no air-borne sediment enters waterways

2.3.2 The Regional and District Councils will ensure that any new earthworks undertaken within the Ngāti Rangī iwi boundary have a condition addressing an accidental discovery protocol for the potential unearthing of any archaeological material. This must contain the following conditions:

- a. Ngāti Rangī be contacted immediately;
- b. work will cease until permission is given by Ngāti Rangī; and
- c. an archaeological assessment will be undertaken by an archaeologist approved by Ngāti Rangī.

2.3.3 Protocols are in place to ensure that the sourcing, transportation and stock piling of aggregate is conducted in a controlled manner to eliminate weed dispersal within and to our rohe.

2.3.4 All vehicles will be fully cleaned in accordance with biosecurity protocols between sites and catchments.

2.3.5 No vegetation clearance will occur without consultation with Ngāti Rangī.

2.3.6 Any road works and earthworks occurring on the Mountain Road will identify appropriate depository sites in consultation with the Department of Conservation and Ngāti Rangī Trust for all excess material as a result of slips or road maintenance. No naturally occurring material from the mountain is to be removed off the mountain under any circumstance without consultation directly with Ngāti Rangī.

SOIL CONTAMINATION

2.4.1 The use of chemicals that leave long-lasting residues in soil is not agreed to by Ngāti Rangī. Nor is the dumping of such chemicals.

2.4.2 Ngāti Rangī will develop positive relationships with the agricultural community with regard to the use and storage of fertilisers, pesticides and other chemicals to reduce the likelihood of soil contamination.

2.4.3 Adequate measures are undertaken by industry and regulators to eliminate current and avoid future soil contamination through leaching or deliberate application of chemicals.

2.4.4 Relevant authorities work with Ngāti Rangī to compile a register of contaminated sites in our rohe.

2.4.5 Contaminated soils will be cleaned and, where possible, kept within our Ngāti Rangī region.

Land Use

2.5.1 Ngāti Rangī are in support of organic farming and organic agriculture in our region.

2.5.2 Land within our region should be used according to its Land Use Classification and within its natural capabilities. Land currently used beyond its capabilities should be converted over time to more appropriate uses.

2.5.3 Where a change or intensification of land use is proposed, land users shall undertake nutrient benchmarking and implement an approved nutrient management plan for that property.

EROSION AND SEDIMENTATION

2.6.1 Areas at risk from erosion should be identified and planted with appropriate species to avoid damage to waterways, people, property and productivity.

WASTE

2.7.1 Ngāti Rangī support local and national zero waste initiatives that reduce the waste build up in rubbish tips within our region and country. This may include:

- a. encouraging food production companies to use recyclable packaging for their products;
- b. encouraging retailers to offer bulk buying or to allow customers to bring their own containers;
- c. banning plastic bags in the Ngāti Rangī rohe; and
- d. campaigning to reduce packaging sold in our region.

Challenging ourselves to be intergenerationally planning. Businesses and mine companies are here for the short term; we are going to be here for a thousand years and more.'

Hikoi Te Riaki



Artwork by Waimarama Sinai

NGĀ TURE – RULES

PAPA-TŪ-Ā-NUKU

Mining and Quarrying

- 2.1.1.1 No prospecting, exploration, or mining of any minerals, metals and/or fossil fuels shall take place in the Ngāti Rangī region.
- 2.1.1.2 No gravel extraction shall be undertaken in a river/stream bed or within the 10 year flood zone.
- 2.1.1.3 Any gravel extraction undertaken will be conducted in a way that avoids adverse effects on the environment and:
 - a. will not occur in any unmodified area;
 - b. will not occur in an area of environmental and cultural significance to Ngāti Rangī; and
 - c. must have no impact on native fish, their habitat, migration or spawning.

Subdivision

- 2.2.1.1 Any subdivision or development must be undertaken in accordance with the policies listed above and must:
 - d. Involve adequate consultation with and secure the approval of Ngāti Rangī
 - e. Not involve risk to culturally significant areas or native flora and fauna
 - f. Include an Accidental Discovery Protocol
 - g. Apply socially and ecologically sound town planning practices
 - h. Utilise sustainable materials and practices.

Road Works and Earth Works

- 2.3.1.1 Road works and earth works will utilise appropriate mitigation measures to ensure no sediment enters adjacent waterways.
- 2.3.1.2 All road and earth works will contain an Accidental Discovery Protocol.
- 2.3.1.3 Biosecurity protocols will be followed for both aggregate and machinery to prevent weed invasion and dispersal.
- 2.3.1.4 Appropriate consultation will be undertaken.
- 2.3.1.5 No naturally occurring material from the mountain is to be removed off the mountain under any circumstance without consultation directly with Ngāti Rangī.

Soil Contamination

- 2.4.1.1 Consenting authorities will not grant consents for activities that involve a risk of contaminants entering soil.

Erosion and Sedimentation

- 2.6.1.1 Consenting authorities will include conditions to appropriately manage erosion-prone areas when granting consents.

Land Use

- 2.5.1.1 Resource consent will not be granted by local authorities where it allows land to be used beyond its Land Use Capability classification.
- 2.5.1.2 Resource consent will not be granted by local authorities for intensification of land use unless that consent includes nutrient benchmarking and effective nutrient management mechanisms.

Waste

- 2.7.1.1 Waste creation and disposal will be considered by consenting bodies as part of resource consent application assessments, and conditions to avoid waste build-up will be included in any consents granted.

3. TE POU TUATORU: TĀNE-NUI-A-RANGI

“Nō mua mai anō e te iwi mōrehu, te tukitukinga i te whare o mata atua Tāne. Ka totoro tāhau waho ki te hura i te riu o te waka ki runga kia riro ake ko te puna o te kākāwai taiherehere iho ki te mātā wai puna, o puna i kimihia ...”

Ngāti Rangi’s history has been centred in the realm of Tāne, as we are people of the ngahere. The protection of native flora and fauna is paramount to Ngāti Rangi, but so too is the protection of our customary needs. The balance between this give-and-take relationship needs to be restored to enable the protection of our taonga as well as ensuring our cultural practices are not jeopardised.

The issues based around Tāne’s dominion include forestry, native flora and fauna, customary use, tourism, genetic engineering and pest control. These issues vary in nature from the health and wellbeing of the forest as a whole, to the customary use of the forest by Ngāti Rangi through to the use of the forest by others. The issues outlined are not definitive of the whole concerns of our iwi – other issues include:



The majesty of Tāne

*‘Kōrero to the rongoā plant;
they’re our whanaunga, our relations.*

*You’re asking for them to give up part
of them to support the māuiui in your
whānau.’*

Keith Wood

NGĀ TAKE – ISSUES

3.1 FORESTRY

Forestry itself provides numerous benefits for the environment in terms of reducing the likelihood of flooding, soil erosion, landslides, nutrient losses, and also improved water quality. Despite this, the clear fell harvesting and replanting phase increases the likelihood of impacts such as flooding, soil erosion, and landslides. This can impact our waterways, soil productivity, and native flora and fauna.

3.2 NATIVE FLORA AND FAUNA

Whilst the Ngāti Rangi area has extensive native bush patches, pasture and farmlands dominate the region. A number of taonga species have disappeared from the Ngāti Rangi tribal area due to the removal of native bush, pest invasions and modification of the landscape and freshwater systems.

3.3 CUSTOMARY USE

Administrative barriers and policies limit and restrain Ngāti Rangi in our continued use of native plants and animals for customary purposes.

3.4 TOURISM

Tourism has the potential to exploit and take advantage of Ngāti Rangi wāhi tapu and special places. Environmental and cultural impacts can include accumulation of waste, misuse, and a general lack of understanding regarding the importance of an area.

3.5 GENETIC ENGINEERING

The potential for negative and unforeseen outcomes resulting from the introduction of genetically engineered plants, animals and organisms is an issue for Ngāti Rangi.

3.6 PEST CONTROL

Ngāti Rangi is concerned with the threat posed to native flora and fauna populations from invasive species. Our taonga species are continually at risk not only from invasive species predation but also displacement of plants and animals by introduced species.



Tāne's child – the piupiu or crown fern

NGĀ WHĀINGA – OBJECTIVES

- Forestry practices actively protect rivers, streams and wetlands during harvesting and replanting periods.
- Populations of native flora and fauna throughout Ngāti Rangi rohe increase.
- Native flora and fauna is abundant and available for customary purposes at the discretion of Ngāti Rangi.
- Tourism is conducted in a way that is consistent with Ngāti Rangi values and principles.
- Ngāti Rangi as an iwi, our natural world, and the region will remain G.E. free.
- Pest control is conducted in a way that is consistent with Ngāti Rangi values and principles.



Art work by Pani Henare

KAUPAPA TOHU – POLICIES FORESTRY

- 3.1.1 All rivers, streams, and wetland margins within forestry plantations are planted with appropriate native plants (eg flaxes and grasses), with a 10 m or greater buffer. (More may be needed in steeper areas.)
- 3.1.2 Forestry roads are managed to prevent sediment entering waterbodies.
- 3.1.3 Ngāti Rangi support sustainable forestry and selective harvesting of planted forests. We do not support clear felling. We support the inclusion of native species in siviculture.
- 3.1.4 Ngāti Rangi are in support of forestry methods that reduce negative impacts during harvest and replanting.

NATIVE FLORA AND FAUNA

- 3.2.1 Ngāti Rangi considers there is a need for the development of a project that will enable the protection, access and storage of the seeds of local species.
- 3.2.2 Locally extirpated species will be reintroduced into Ngāti Rangi tribal lands.
- 3.2.3 Ngāti Rangi seek to establish a managed native forest, in line with sustainable practices and tikanga tuku iho, to provide wood for carving and other customary activities in the future.
- 3.2.4 Naturally occurring native forest should be left to stand, unless there are exceptional circumstances and approval is given by Ngāti Rangi.

3.2.5 When any native bush clearance is undertaken by the Department of Conservation, or native bird carcasses are recovered, Ngāti Rangī will have full access to these for cultural purposes.

3.2.6 Within the limits of what the forest is sustainably able to give, Ngāti Rangī uri and descendants have uninhibited access to traditional plant and animal species for cultural purposes. This could include, but is not limited to the following:

- a. native tree felling for cultural purposes;
- b. unearthing of any significant native timber for cultural purposes;
- c. sourcing material for weaving, structures and cultural purposes;
- d. access to plants as wai rākau and for the purposes of rongoā; and
- e. access to plants and animals for cultural purposes.

PEST CONTROL

3.3.1 Pest control (especially involving pigs and deer) within the Ngāti Rangī rohe should be undertaken in conjunction with iwi to ensure that food sources are not heavily impacted on.

Genetic Engineering

3.4.1 The Ngāti Rangī region will remain free of G.E. This includes but is not limited to:

- a. animal and plant gene manipulation;
- b. any G.E. field trials; and
- c. any food containing anything from a G.E. origin.

TOURISM

3.5.1 Current and potential new tourism ventures operations will comply with Ngāti Rangī guiding principles and values relating to the protection of our environment.

3.5.2 Tourism operators within the Ngāti Rangī rohe have at least 50% of their workforce sourced locally.

3.5.3 Ngāti Rangī cultural kōrero is delivered by Ngāti Rangī uri or Ngāti Rangī approved guides only.

NGĀ TURE – RULES TĀNE-NUI-A-RANGI

Forestry

3.1.1.1 Resource consents for forestry must include conditions for sediment control, planted riparian buffers and soil loss prevention that align with Ngāti Rangī policies and the best known practice at the time, internationally.

Pest Control

3.3.1.1 All pest control operations will involve Ngāti Rangī, and will be managed in a way so as to facilitate food recovery by uri and locals.

Genetic Engineering

3.4.1.1 Genetic engineering is prohibited within the Ngāti Rangī rohe, including any animal or plant gene manipulation. This will include any introduction of G.E. species.

Tourism

3.5.1.1 Ngāti Rangī kōrero will only be delivered by Ngāti Rangī uri, or other guides approved by iwi if appropriate.



Harakeke around Rangataua-nui, Ohākune Lakes Reserve

‘The trees themselves are always releasing their wairua energy to help revitalise us as well.’

Keith Wood

4. TE POU TUAWHĀ: TANGAROA-I-TE-WAI- MĀORI

“... Tukuna iho he wai, he wai nō te mata here o Ranginui-ā-Tāne

Tākirikiritia te wai pūpū, te wai pīpī, te wai patapata, turuturu o Tangaroa ...

Rere nui, rere roa, rere mai uta, rere ki tai

Rere atu ki moana uriuri, ki moana uraura, ki te moana tūātea!”

Tangaroa-i-te-wai-māori is the embodiment of freshwater within our region. He is present in the numerous waterways that run along the back of Papa-tū-ā-nuku; he is the lifeblood of Ngāti Rangi. Water is a fundamental element of all facets of life and is essential to our health and wellbeing. Our waterways provide us with a constant supply of mouri to replenish and revitalise our iwi. However, there are huge concerns over the state of our freshwater and its mouri, and how this impacts on Ngāti Rangi as an iwi.

There are a number of concerns identified in this section, including the following: issues with storm water and water takes, all discharges into waterways in our region, culverts, weirs and dams, the quality of water, the management of the riparian margin, and lastly diversions and water mixing.

‘The teardrops of Koro sharing his love for us and with us

And the beauty that flows from his tears of unconditional love

To the sparkling wai that runs down to create the essence of life

For all that humbly live on Papa-tū-ā-nuku.’

Marama Gray

NGĀ TAKE – ISSUES

4.1 WATER QUALITY

Water quality is impacted by point source discharges and leaching and run-off from urban and rural sources. Parameters affecting water quality include phosphorus and nitrogen (and the resulting increase in algal growth), sediment, effluent, heavy metals, bacteria, organic inputs and hydrocarbons. Abstractions also impact on water quality through loss of dilution factors. Water quality is linked to the mouri of our rivers and streams.

4.2 POINT AND NON-POINT SOURCE DISCHARGES

Protection of the mouri and the ecological values of individual waterways is a priority for Ngāti Rangi. Discharges can impact on the ability of the waterway to undertake its role in supporting the life contained within and around it. In the Ngāti Rangi rohe, discharges include agricultural and horticultural run-off, vegetable washing water, storm water, industrial discharges, hydro-generation discharges, and effluent discharges. Some of these are treated; others are not. Coupled with specific treatment systems to remove contaminants, passing wastewater through Papa-tū-ā-nuku can be a culturally acceptable means to cleanse discharges.

4.3 STORM WATER

Storm water carries a large array of contaminants. These include fertilisers, detergents, heavy metals, bacteria, hydrocarbons and sediment. Contaminants originate from roads, carparks, industrial sites and domestic properties. In most cases, storm water is not treated before it enters water bodies. Furthermore, during high rain events current storm water systems transport large volumes of water quickly to streams and rivers, causing rapid increases in water levels. This has negative impacts on native fish species, plants and bank stability. When not separated from sewage lines, storm water also impacts on the ability of treatment plants to process sewage.

4.4 RIPARIAN MARGIN MANAGEMENT

Many places in the region have little or no riparian planting, leaving them unmanaged and susceptible to increased temperatures, erosion, sedimentation and at a higher risk from run-off of nutrients, sediment and other contaminants into waterways.



A tributary of the Mangaturuturu River, Turoa Ski Field

4.5 WATER TAKES

Water takes are an issue for Ngāti Rangi. Water is abstracted in our region for hydroelectricity generation, irrigation, vegetable washing, snow-making, and industrial use. Ngāti Rangi are concerned with the impact water takes have on aquatic species, the hydrology and ecology of local water bodies, water quality, and the mauri of our waters. There is also concern over our region's aquifers and the impacts resulting from abstraction. Identifying acceptable abstraction limits and low flow limits for our waterways is essential to maintaining their ecological and cultural health.

4.6 DIVERSIONS AND WATER MIXING

The diversion of Ngāti Rangi waterways for power generation is an issue the iwi has been dealing with for over three decades. These diversions involve substantial cultural and ecological impacts, including the severing of spiritual connections, the unnatural mixing of the mauri of different waterbodies, loss of natural flow variability, and the dewatering of multiple streams. The diversions remain a cause of grief amongst Ngāti Rangi people.

4.7 CULVERTS, WEIRS AND DAMS

Badly designed or managed weirs and culverts pose a problem for the movement of native fish species throughout a catchment by blocking upstream and downstream passage.

4.8 WETLAND DRAINAGE

As with much of New Zealand, many historic Ngāti Rangi wetlands have been drained, taking with them the eels and kōura that lived there, the plant resources for weaving and housing, and the flood and drought protection these places provided.

4.9 RIVER AND 'DRAIN' CLEARANCE

Digging in rivers, streams and 'drains' on farmland and in urban settings destroys eel, fish and kōura habitats. Often these species are dug out with the sediment and die on the banks or are crushed by the digging equipment. Any kākahi present are also at risk of being dewatered. Better sediment management combined with targeted planting along the banks of these areas would alleviate the need for digging in 'drains' and streams in the first place.

NGĀ WHĀINGA – OBJECTIVES

- Water flowing out of our region will be clean and healthy, to ensure Ngāti Rangi's obligations to our downstream whānau are met.
- There are no discharges (either point source or non-point source) that impact on water quality.
- Land is utilised throughout the region as an added measure of purification for wastewater prior to any discharge into waterways.
- Storm water is captured and treated, and where possible utilised as a resource. Where released to streams, it is released in a manner aligned with natural flow regimes.
- All waterbodies and wetlands in the Ngāti Rangi region have planted riparian margins.
- Water takes are managed in a way that allows our rivers and streams to be healthy and flourishing.
- Waters flow in their natural catchments.
- Culverts, weirs and dams allow for native fish migration, but block trout access to uninvaded areas.
- All waterbodies and wetlands are free from digging.

KAUPAPA TOHU – POLICIES

WATER QUALITY

4.1.1 Water quality in the Ngāti Rangi rohe must be swimmable and fishable at all sites, at all times, unless it is naturally unswimmable.

4.1.2 Ngāti Rangi aims to be involved in all water quality monitoring in our region.

Point and Non-point Source Discharges

4.2.1 Ngāti Rangi does not support discharges to water.

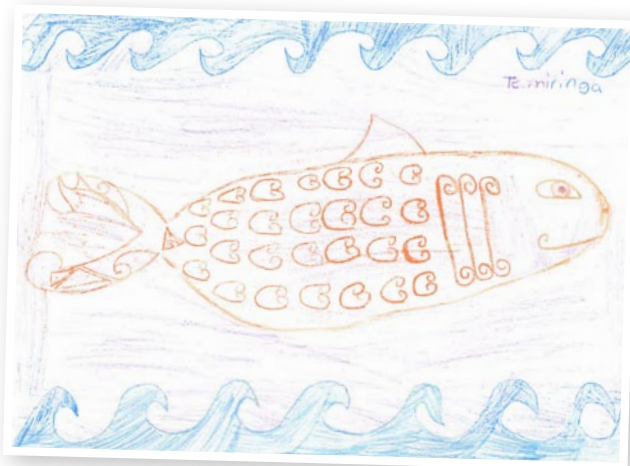
4.2.2 However, some discharges may be considered in exceptional circumstances. Any discharges agreed to by Ngāti Rangi will:

- a. pass through land or a wetland prior to release to water; and
- b. be high quality, free from contaminants, not contribute to cumulative impacts nor have any effect on the waterbody and its mouri.

4.2.3 There should be no impact on the mouri and ecology resulting from point or non-point discharges to water. Neither should there be any stress to aquatic species through algal blooms, temperature increases, or contaminants contributed by discharges.

4.2.4 Ngāti Rangi supports buffer zones around horticultural crops. We support soil retention practices, such as aligning crop rows to land contours to reduce run off.

4.2.5 Ngāti Rangi supports the full exclusion of stock from all water bodies in our region. Ngāti Rangi will seek opportunities to support landowners in practical ways as they work to exclude stock from their water bodies. Ngāti Rangi will support moves by local and national authorities to exclude stock access to waterbodies.



Artwork by Te Miringa Richards

STORM WATER

4.3.1 The management of storm water in the region needs to be such that:

- a. rainwater is collected and utilised (eg for irrigation of city and town gardens, use for private gardens, toilet flushing and clothes washing etc)
- b. storm water is able to be retained at source so that the rate of discharge is attenuated
- c. storm water treatment areas are created (eg constructed wetlands in urban streets, pooling areas in parks and on farms, etc)
- d. any storm water discharged to waterbodies is of a high quality and not contaminated with sediment, heavy metals, bacteria or other pollutants.

4.3.2 Ngāti Rangi supports the use of plants, gravel etc in urban storm water systems to aid in the purification of water prior to its reuse or discharge.

4.3.3 Local government policies and rules should facilitate the adoption of low impact systems in new buildings and renovation, including:

- a. building and decorating materials (eg paint) that is environmentally friendly and/or endorsed by 'Environmental Choice NZ';
- b. tanks to capture rainwater from roofs for domestic purposes other than for drinking water; and
- c. green roofs.

RIPARIAN MARGIN MANAGEMENT

4.4.1 Ngāti Rangi considers that the margins of all water bodies should be planted to:

- a. Prevent run off
- b. Provide shading,
- c. Provide a terrestrial food supply;
- d. Provide terrestrial corridors for birds and lizards;
- e. Provide rongoā; and
- f. Provide amenity values.

WATER TAKES

4.5.1 Abstractions that impact the ecology, hydrology or mouri of the waterbody are not supported by Ngāti Rangi.

4.5.2 Ngāti Rangi, in conjunction with the Regional Council, will conduct an audit to identify takes that occur within our rohe.

4.5.3 Ngāti Rangi will work with Horizons Regional Council at the common catchment review period to ensure the National Policy Statement for Freshwater Management policies and objectives on allocation are fully implemented, in particular, that over-allocation is eliminated.

4.5.4 Ngāti Rangi will work with Horizons Regional Council at the common catchment review period to ensure abstractions are ecologically and culturally sound, including an abstraction rate of not greater than 30% of MALF and low flow limits that retain 100% of critical habitat for streams in the Ngāti Rangi rohe.

DIVERSIONS

4.6.1 No new unnatural mixing of waters from different catchments will take place within the Ngāti Rangi region.

CULVERTS, WEIRS AND DAMS

4.7.1 All culverts and other structures are modified or designed to ensure that no disruption to the migratory path of native fish species occurs. Regular maintenance is undertaken to ensure continued passage.

4.7.2 Sediment issues on existing structures are managed to prevent sediment starvation, bed armouring and/or over-supply of fine material.

4.7.3 No new dams will be constructed in the beds of Ngāti Rangi waterbodies.

4.7.4 No new structures that affect natural flow variability will be built in the Ngāti Rangi rohe.

WETLAND DRAINAGE

4.8.1 All wetlands within the Ngāti Rangi region will be protected from drainage, and enhanced where possible.

RIVER AND 'DRAIN' CLEARANCE

4.9.1 No in-stream digging of any river, stream or 'drain' within our region is to be undertaken.

4.9.2 Sedimentation and flooding issues will be dealt using soft engineering methods, eg planting and water retention.



An example of a healthy, well-vegetated stream

When I think of the Whanganui and how that's the spiritual flow, if the river is not healthy, neither is its spiritual flow, and if we're polluting up the top of the Mangawhero then how does it affect our relations down the way?'

Korty Wilson

NGĀ TURE – RULES

TANGAROA-I-TE-WAI-MĀORI

Water Quality

4.1.1.1 No resource consent shall be granted that renders a water body unswimmable or unfishable, including resource consents that contribute to cumulative effects on swimming quality or fishability, or takes that impact on water quality and habitat.

Point and Non-point Source Discharges

4.2.1.1 In general, discharge consents to water should not be granted.

4.2.2.1 Any discharge consents that are granted must:

- a) Not impact upon the mauri of the waterbody;
- b) Have no impact on the receiving waterbody (as opposed to less than minor effects);
- c) Not contribute to cumulative effects; and
- d) Pass through Papa-tū-ā-nuku.

Storm Water

4.3.1.1 Resource consents for storm water will ensure that storm water:

- a) Is captured, treated and, where possible, utilised;
- b) Discharges are high in water quality; and
- c) Releases mimic natural flow regimes.

Riparian Margin Management

4.4.1.1 Resource consents for activities involving water (including but not limited to takes and discharges for industry, forestry, horticulture and agriculture) will require sufficient riparian planting, stock exclusion and other run-off control or discharge treatment mechanisms as appropriate.

Water Takes

4.5.4.1 No abstraction of greater than 30% of Mean Annual Low Flow (MALF) shall be granted for any waterway in the Ngāti Rangī rohe, unless agreed as part of a Ngāti Rangī Relationship Agreement for exceptional reasons.

4.5.4.2 No abstraction resulting in a low flow of less than 100% of MALF or 100% of critical habitat (whichever is naturally lower) shall be granted for any waterway in the Ngāti Rangī rohe, unless agreed as part of a Ngāti Rangī Relationship Agreement for exceptional reasons.

Diversions

4.6.1.1 No new resource consents to divert water between catchments will be granted in the Ngāti Rangī rohe.

Culverts, Weirs and Dams

4.7.1.1 No consent will be granted that allows the creation of a barrier to native fish passage, unless approved by Ngāti Rangī for conservation or cultural reasons.

4.7.1.2 No consent will be granted for any in-stream structure that creates sediment issues, including sediment starvation or over-supply of fine material.

4.7.1.3 No new dams in the beds of natural lakes or rivers will be consented in the Ngāti Rangī rohe.

4.7.1.4 No resource consent will be granted that affects the natural flow variability of any waterway in the Ngāti Rangī rohe, unless agreed as part of a Ngāti Rangī Relationship Agreement.

Wetland Drainage

4.8.1.1 No wetland drainage will be consented in the Ngāti Rangī rohe, for any part or whole of any wetland.

River and 'Drain' Clearance

4.9.1.1 No new resource consent shall be granted for digging in any channel or canal.

4.2.1.1 'Soft engineering' solutions will be given preference by decision-makers.

'I think sustainability is about a process you just start.

You don't stop, you just carry on.'

Nick Singers

5. TE POU TUARIMA: RONGOMĀTĀNE

"... Rongomātāne, Rongo-mā-eu e tū mai Tangaroa ki waho, tēnā te huhuki ka whano, ko te huhuki o te whare o Ranginui e tū nei."

As atua of cultivated food, Rongomātāne plays a fundamental role in our region. The fertility of our soils both from Papa-tū-ā-nuku and Matua te Mana allows the region to be a produce leader. Ngāti Rangī wish to maintain the fertility of our soils as part of the gifts from Papa-tū-ā-nuku and Matua te Mana.

Because Rongomātāne only covers cultivated food, the main issues for this section are connected with intensive horticultural land use activities, such as market gardens, and impacts on soil structure. Issues around water quality and land use have been covered in Tangaroa-i-te-wai-māori and Papa-tū-ā-nuku.

NGĀ TAKE – ISSUES

5.1 HORTICULTURE

The Ngāti Rangī rohe, with its rich volcanic soils, is a market gardening stronghold. However, market gardens can place pressure on local water bodies through abstractions and discharges, and can degrade soil structure and reduce its quality and quantity. The impacts of herbicides, pesticides and fertilisers are a matter of concern for Ngāti Rangī.

NGĀ WHĀINGA – OBJECTIVES

- Organic horticulture becomes the leading industry within the Ngāti Rangī rohe.
- Horticulture is conducted in a sustainable, zero-impact manner.
- Chemical use on the soils in our region decreases.

KAUPAPA TOHU – POLICIES

MARKET GARDENS

5.1.1 Ngāti Rangī supports movement towards local, commercially-grown, organic crops.

5.1.2 Market gardens utilise best practice methods¹ in all aspects of the industry from planting through to washing.

5.1.3 Vegetable washing does not result in discharges of nutrients, agrichemicals or sediment to waterbodies.



Artwork by Daneisha Karipa

'Encouraging natural processes that help feed the whenua, our land, keep it healthy and keep sustaining it for ourselves.'

Keith Wood

NGĀ TURE – RULES

RONGOMĀTĀNE

Agrichemicals

Relevant authorities will provide feedback to Ngāti Rangī every three years on the use of agrichemicals in the rohe.

Discharges

Consenting authorities will not grant consents for horticultural activities (including vegetable washing) where that consent allows discharges (diffuse or otherwise) of nutrients, agrichemicals or sediment to local water bodies (including groundwater).

1. Refers to the 2009 Franklin Sustainability Project support by the Ministry for the Environment <http://www.mfe.govt.nz/issues/land/rural/market-gardens.html>. Other updated standards may be used in the future.

‘A lahar is Koro sharing some of his mana with us.’

Che Wilson

6. TE POU TUAONO: RŪAUMOKO

*“E kore e ngaro te riringa o Ruapehu
Ka tuku te puehu, te auahi ee
Ko te riri koromaki, ka ngāruē te whenua
Ka puha, ka ngunguru me he tai tuki ee”*

Rūaumoko is the atua of our maunga Ruapehu; through Koro Ruapehu he is able to share his raw power with us. Rūaumoko is responsible for the many natural occurrences that we as Ngāti Rangi experience: earthquakes, lahars, volcanic eruptions and the associated thunder and lightning events. Ngāti Rangi have lived under the mantle of Matua te Mana for many generations and with that comes an acceptance and celebration of the natural events that take place here. We live alongside both Koro Ruapehu and Rūaumoko and have placed our pā and kāinga some distance from the pathways of volcanic events.

Our main issues around this area lie with the approach taken to address and mitigate Rūaumoko’s events, termed by managers as “natural disasters” or “hazards”. Other issues not included in here are:

- Volcanic monitoring and research
- Disaster response

NGĀ TAKE – ISSUES

6.1 MANAGEMENT OF NATURAL EVENTS

It is Ngāti Rangi’s view that Rūaumoko’s processes are natural, and should be allowed to occur. Rūaumoko was, after all, in existence before humans. We consider that ‘natural hazard management’ should not so much be a matter of constraining natural processes in order to protect humans, but of removing ourselves and our buildings from areas of risk in order to let these processes occur as intended. In some ways, the designation of tapu areas is a recognition that those areas are not necessarily safe and should probably be avoided.

NGĀ WHĀINGA – OBJECTIVES

- The natural processes of Ruapehu as a volcano are not restricted by human intervention.



Artwork by Rangihikitia O’Neil

KAUPAPA TOHU – POLICIES MANAGEMENT OF NATURAL EVENTS

- 6.1.1 Ruapehu Maunga will not be altered or tampered with in any way as part of any management strategy as a means to divert or withhold the flow of a lahar.
- 6.1.2 No new buildings will be erected in known lahar paths.
- 6.1.3 Monitoring and management of natural events in connection with Rūaumoko will involve Ngāti Rangi.

NGĀ TURE – RULES RŪAUMOKO

Management of Natural Events

- 6.1.1.1 Ruapehu maunga will not undergo any physical works, or have any structure installed as part of any emergency management strategies, to divert or withhold the flow of a lahar.
- 6.1.2.1 New consents will not be granted for buildings within known lahar paths.



The 2007 lahar in the Whangaehu River, Karioi.
Photo: Keith Wood.

7. TE POU TUAWHITU: MATUA TE MANA

*“... Kia tū wātea taku titiro ki te puke ki Ruapehu
Te whakaingo mai he tau pakipaki
Papaki rawa i taku uma
He puke nohoanga nō te keukeu roa
He roa te taringa kia whakaaria mai ngā tohu
tukutuku
Tukutahi te puehu turaki whakatua
Ka whakahoki mai hei tāpora mō te nohoanga i a
koutou mā eei”*

Matua te Mana is our ancestral maunga and the source of our identity. Koro Ruapehu is the anchor for us to our whenua, and he exists as the stronghold of our people. From Te Wai-a-Moe and from Koro’s slopes spring forth our waterways, which carry mouri and mana directly from Koro Ruapehu and through to our people.

The main issues we as Ngāti Rangī have in this section are based on the use and management of our maunga. Tourism in general in our area, and specifically on our maunga, has plusses and minuses. While many Ngāti Rangī uri spend time on Koro, using roads and lifts to go onto his slopes, we also recognise that these structures have an impact on him and the forests that cover his lower flanks. Ngāti Rangī is responsible for caring for Koro in this complex context.

Ruapehu’s glaciers serve as a cultural reference point for Ngāti Rangī and other iwi. The glaciers seem to have been decreasing in recent years, which has led to concern amongst uri. A further matter for consideration is the increasing number of requests to film on and around the maunga.

Because Rongomātāne only covers cultivated food, the main issues for this section are connected with intensive horticultural land use activities, such as market gardens, and impacts on soil structure. Issues around water quality and land use have been covered in Tangaroa-i-te-wai-māori and Papa-tū-ā-nuku.



Koro Ruapehu – Matua te Mana

NGĀ TAKE – ISSUES

7.1 TOURISM AND RECREATION

Ruapehu is a destination for many tourists, mountain bikers, skiers and snowboarders, and trampers. The high volume of visitors to the area brings rubbish, human waste, road works and air pollution to our ancestral maunga. The protection of Koro, significant sites and cultural heritage is a priority for Ngāti Rangī, particularly the peaks and Te Wai-a-Moe.

7.2 GLACIERS

There is concern over the loss of the glaciers on Ruapehu, most likely as a result of climate change. The loss of these glaciers will negatively impact on Ngāti Rangī culture and historical kōrero.

7.3 FILMING

Ruapehu is deeply sacred to us as Ngāti Rangī. We take our responsibility to care for Ruapehu and maintain his sacredness seriously. Ngāti Rangī are willing to consider requests to film on the maunga. However, such requests often come without sufficient time to be properly considered by the iwi. Ngāti Rangī are often rushed into making a decision. At times Ngāti Rangī are not consulted prior to applications being lodged with the Department of Conservation. This means we are restricted to unreasonable timeframes and cannot discuss proposals with applicants in a proper manner.

NGĀ WHĀINGA – OBJECTIVES

- The use of Ruapehu is managed in a way that adheres to the values and guiding principles of Ngāti Rangi, including the protection of the peaks and Te Wai-a-Moe.
- Rubbish and waste management (including human waste) on the maunga is exemplary and leaves Koro in a pristine state.
- Ruapehu’s glaciers will be protected, inasmuch as it is possible to do so.
- Filming activities are only undertaken in line with Ngāti Rangi values, principles and processes.

KAUPAPA TOHU – POLICIES TOURISM AND RECREATION

7.1.1 Te Wai-a-Moe and the peaks are sacred. Access to this area should be for significant cultural and scientific reasons only.

7.1.2 As an overarching principle, Ngāti Rangi considers it inappropriate and unacceptable to expand or increase infrastructure on the maunga.

7.1.3 The management of all facilities located on the southern side of Ruapehu must ensure:

- a. human waste is treated in a manner consistent with Ngāti Rangi values, not left on the maunga to decompose or be discharged in any form to the maunga
- b. all paints and chemicals used must be sourced under the ‘Environmental Choice NZ’ standard or equivalent
- c. operational and maintenance activities do not result in paint or chemicals reaching the ground or waterbodies.

7.1.4 Rubbish (especially smoke butts) will be managed by all parties, including the Department of Conservation and permit holders (formerly ‘concessionaires’), to ensure Ruapehu is maintained as a pristine environment. Ngāti Rangi considers that there is no excuse for any litter on the maunga.

7.1.5 The maunga becomes smokefree by 2020.

7.1.6 Alcohol should only be consumed in designated areas as agreed to by Ngāti Rangi. A total ban should be considered.

7.1.7 No further reservoirs will be allowed on Ruapehu.

7.1.8 As part of track maintenance, Department of Conservation must contact Ngāti Rangi Trust if any tōtara, miro, tōī, neineiriki or other taonga species are to be removed.

7.1.9 Ngāti Rangi will be fully involved in the decisions on any new tracks or cycle routes on and around Ruapehu.

7.1.10 Any road works and earth works occurring on Ohākune Mountain Road will identify appropriate depository sites in consultation with the Department of Conservation and the Ngāti Rangi Trust for all excess material as a result of slips or road maintenance. No naturally occurring material from the mountain will be removed off the mountain under any circumstances without consultation with Ngāti Rangi.

GLACIERS

7.2.1 Ngāti Rangi supports academic study regarding Ruapehu and his glaciers as a means to further understand the trends.

7.2.2 Ngāti Rangi encourages individual homes, papakainga, marae and businesses towards self-sustaining fossil-fuel free power.

7.2.3 Ngāti Rangi will promote the importance of the glaciers on Ruapehu and encourage decision-makers to prioritise their protection through appropriate climate change policies and mitigation strategies.

FILMING

- 7.3.1 Filming requests will only be considered when:
- Discussions are entered into with Ngāti Rangī prior to a concession application being lodged with the Department of Conservation.
 - Requests are made at least two months' prior to proposed filming dates; and
 - Provision is made for a Ngāti Rangī Cultural and Environmental Monitor to accompany film crews in our rohe, especially on the maunga.

*'Ascending up high and then the
Receding up here of our Koro
Accusingly, sigh in despair
Karanga mai, nau mai, hoki mai
Oh, I can see the
Piercings appear with each mount
Aroha mai
Karanga mai ra, arakopaka, hoki mai koe
Aroha mai.'*

Novena McGuckin



Artwork by Ebony-Fair Thomas

NGĀ TURE – RULES MATUA TE MANA

Tourism and Recreation

7.1.3.1 No consent shall be granted to discharge human waste in any form to the maunga or to leave human waste on the maunga to decompose. It will be removed from the maunga and treated in a manner consistent with Ngāti Rangī values.

7.1.3.2 All paints must meet the Environmental Choice NZ standard or equivalent.

7.1.3.3 No consents shall be issued by any consent authority that allow discharges of paint or contaminants to ground or water on the maunga.

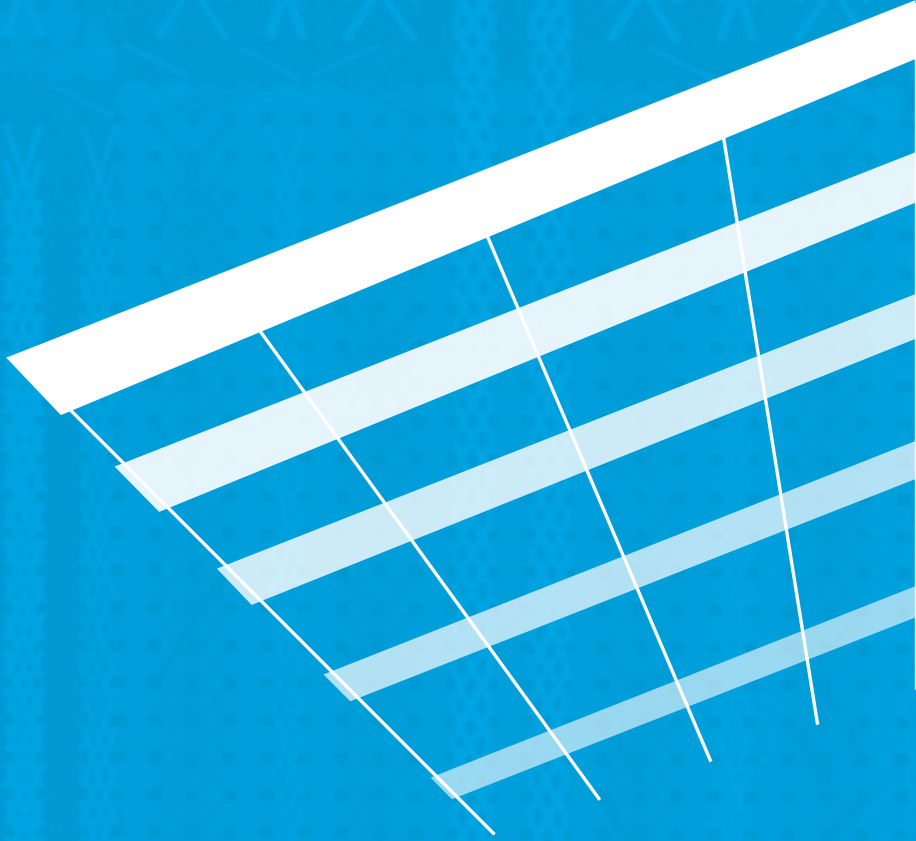
7.1.4.1 No litter is to be left on the maunga.

7.1.7.1 No further reservoirs will be consented by consenting authorities.

7.1.10.1 All inorganic material disturbed on the maunga during road works or construction will be left on the maunga, unless moved in consultation with Ngāti Rangī.

Filming

7.3.1.1 Filming will only be considered if it is in line with the policy outlined above.



SECTION 4: NGĀ HEKE KŌRERO – RAFTERS

SECTION 4: NGĀ HEKE KŌRERO

THE RAFTERS

MAKING A SUBMISSION

Ngāti Rangī Trust makes submissions on behalf of the iwi on consents that are of concern to us. However, if an individual, whānau, or hapū of Ngāti Rangī wish to make a submission on a specific notified consent or plan change they are able to do so. Our Ngāti Rangī Plan is available for use by our people for issues that concern them.

The issues outlined in this plan are aimed at informing applicants on issues that are central to Ngāti Rangī as an iwi. Therefore if you as a member of Ngāti Rangī are unsatisfied with an applicant or an activity, our Environmental Management Plan can act as a guide to your submission.

Our Environmental Management Plan is a relevant document for iwi use not only internally but also for external purposes. The Resource Management Act 1991 has a clause within it that requires local and territorial authorities to acknowledge our plan when developing or altering any planning document (ss66 & 74)².

Therefore, if you want to make a submission on either of the following:

- a notified resource consent application;
- a notice of requirement for a designation;
- a concession application;
- a new plan; or
- a proposed plan change or alteration,

the steps you need to consider are outlined below.

When you write your submission include the following:

- The name of the consenting authority the submission is going to
- Your name, address, phone and email address
- The name of the applicant
- Type of consent it is (describe in detail – proposed activity, location etc)
- Describe the part of the application the submission is concerned with
- State whether you support or oppose the application

- State your reason for making the submission
- Stake whether you think the application should be declined or granted
- State any conditions you think may be relevant to the application
- If it came to a public hearing, state whether you would speak on behalf of your submission.³

DEPARTMENT OF CONSERVATION CONCESSIONS

The Department of Conservation issues concession permits for activities taking place on public conservation land. Ngāti Rangī Trust process several concession applications each month and these follow a different process than Resource Consent Applications. Ngāti Rangī Trust have established a monthly meeting on the 4th Wednesday of every month to receive and process all applications going through the Department of Conservation.

The policies and rules outlined in our Environmental Management Plan will also guide our responses and processes when approached for consultation as outlined in Appendix A of this plan. The Department of Conservation have detailed information regarding the concession application process and also the different types of concession applications.

The development of this Iwi Management Plan utilised a number of other iwi management plans as a guide, namely:

- Ngāti Tūwharetoa Environmental Management Plan 2003;
- Hauraki Iwi Environmental Plan 2004;
- Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008; and
- Te Rūnanga o Kaikōura Environmental Management Plan 2009.

We acknowledge and thank the above iwi for valued inspiration and the lead they provided to us.

2. Ministry for the Environment. (2013). Making a submission about a resource consent application: Getting involved in the resource consent process. Retrieved March 10th 2013, from <http://www.mfe.govt.nz/publications/rma/review-effectiveness-iwi-management-plans-jul04/html/page2.html>

3. Ministry for the Environment. (2013). Review the effectiveness of Iwi Management Plans: executive summary. Retrieved March 10th, 2013, from <http://www.mfe.govt.nz/publications/rma/everyday/consent-submission/>



**SECTION 5:
TE PANI KOKOWAI
– THE FINAL TOUCHES**

SECTION 5: TE PANI KŌKŌWAI

THE FINAL TOUCHES

The use of a whare analogy to construct and develop this plan has provided us with valuable features and a structure to guide our work. This structure allows Ngāti Rangi, through the depiction of our whare, to be understood as we welcome others into our house. As they come into our building, they are able to gain an understanding of our relationship with our environment and the importance we place on the atua, as represented in our pou. This ensures that we as Ngāti Rangi can seek guidance from our atua through the act of 'leaning against the pou', which helps us to connect with and understand the nature of our atua and the realms in which they govern. Te Roro Whare in Section 2 provided an overview of the direction and outcomes we sought from the development of our plan.

Ngā pou o te whare allowed us to explore the domains of our atua and to identify as an iwi what we deemed as significant issues. The identification of issues allowed us to develop our policies and rules to adequately remedy these issues. We do note that not all issues are covered within this document, however, this as a living document and it will continue to grow and change with our people as time passes. If there is an issue of significance to you as an individual, whānau, or hapū please feel free to let us know.

For longevity, a whare requires an exterior and interior coating, traditionally called Te Pani Kōkōwai. This is a reference to the paints and oils used to protect the whare. Ngāti Rangi's vision of vibrantly existing in 1000 years is not a job that we as individuals can do alone but is the role of a collective whānau grouping that leads by example regarding the issues and policies we have identified. This indicates that the way we live today has a significant impact on our taonga and the connections we have to these places and resources. Holding fast to our cultural practices and strengthening the bond we have with our whenua, awa, ngahere and our maunga will ensure that we are receptive to the needs of our taiao as tāngata tiaki.

EXPLANATION OF TERMS:

Unmodified landscape: Landscape that has not been physically, chemically or spiritually modified by humans

Unmodified area: An area that has not been physically, chemically or spiritually modified by humans

Ngāti Rangi region/rohe/area/tribal lands: Tribal boundaries of Ngāti Rangi outlined on in Figure 1.

Low environmental impact: The mouri is unaffected

Sustainable: The equilibrium of the ecosystem and wider environment is maintained

Local authorities/government/bodies:
eg Horizons Regional Council and Ruapehu District Council

TRANSLATION OF MĀORI TERMS USED:

Atua	God, originator
Awa	River
Hapū	Sub-Tribe
Iwi	Tribe
Kai	Food
Kāinga	Home, settlement
Kaitiaki	Responsible guardian (physical or spiritual) of a place, people, group or thing
Kākahi	Freshwater mussel
Mana	Prestige, standing, responsibility
Manaakitanga	The act of caring for and serving others
Manuhiri	Guests, visitors
Maunga	Mountain
Matua	Principal, ultimate
Mouri	Life force, life essence
Ngahere	Forest, bush
Rongoā	Medicine, usually traditional
Pou	Posts, posts upholding a whare
Taiao	The environment
Tāngata tiaki	People responsible for caring for a place or thing
Tāngata whenua	People who belong to a place, people of the land
Taonga	Treasured item(s)
Te Ika-a-Maui	The North Island
Te Wai-a-Moe	'Crater Lake'
Tikanga	Protocols and practices
Tupuna	Ancestor
Uri	Descendent, iwi member
Wāhi tapu	Sacred area, special place
Wai rākau	Dyes
Wai mana	Responsibility to care for the waterways; connection to the waterways
Wairua	Spiritual or unseen matters
Wairuatanga	Matters relating to the spiritual or unseen world; beliefs and faith
Whare	House, meeting house
Whakapapa	Genealogy and connections
Whānau	Family
Whanaunga	Whanaunga
Whenua	Land



Artwork by Hinerauhamo Wilson

APPENDIX A

CONSULTATION INFORMATION PACKAGE NGĀTI RANGI TRUST

INTRODUCTION

This information package is designed to provide applicants with information on engagement with the Ngāti Rangi Trust. This will provide a guide as to how Ngāti Rangi Trust process resource consent applications and the estimate of costs that may be involved. More detail on this process can be provided upon request.

Ngāti Rangi are the tāngata whenua of this region and are the tāngata tiaki over our natural world. Our involvement is required on all consent applications within our rohe, and in all cases, we wish for early and honest engagement with applicants to ensure meaningful collaboration towards a common goal. The level of Ngāti Rangi involvement in applications is heavily dependent on the nature of the proposed activity, its complexity, and the potential effects on the environment and Ngāti Rangi itself. There will be activities that do not require resource consent but may still require consultation and input from Ngāti Rangi.

NGĀTI RANGI CONSULTATION PROCESS

Resource Consents are processed as they arise. For Department of Conservation concessions and permits, Ngāti Rangi Trust meets on the 4th Wednesday of every month to consider and process applications. Ngāti Rangi Trust welcomes direct discussions between the applicant and ourselves prior to the lodging of an application with the relevant authority. Early engagement will allow both parties to work through the application in a collaborative and positive way. Ngāti Rangi Trust, as an affected party, still welcomes consultation with applicants even after their resource consent or concession application has been lodged with local authorities and DOC, but we note that this places time pressures on the process that often results in a less than satisfactory outcome for everyone. If the applicant is engaging with Ngāti Rangi Trust prior to the lodging of their consent, the information we may require is provided in a form at the end of this package.

As part of the consultation process Ngāti Rangi Trust operates a cost recovery mechanism on all resource consent applications and concessions we receive. This reflects the time and energy involved in processing resource consent applications and concessions.

COSTS

In order to adequately recover the costs of processing all applications Ngāti Rangi Trust requires a processing fee for each application we process. Please enquire with the Trust as to current charges. The fee is payable by the applicant to Ngāti Rangi Trust prior to receiving our formal response. This fee is non-refundable and does not guarantee an approved application. Once the Trust has received payment from the applicant, we can then go through the application to begin processing it.

Applicants may apply for a reduced processing fee if they are small community organisations, student researchers, or where research can contribute to the knowledge base of Ngāti Rangi and/or the wider community. The applicant must apply in writing to Ngāti Rangi Trust detailing the need for this waiver.

Ngāti Rangi Trust may decline to process an application where the payment of this processing fee has not been agreed to. The Trust will follow this up with the consenting authority.

The cost outlined above will cover the standard procedures undertaken as part of our processing requirements:

- A meeting with Ngāti Rangi Trust;
- Assessing the application;
- Site visits;
- Wider iwi consultation;
- Discussions with the consenting authority regarding the application; and
- Responding with a formal letter.

The applicant needs to be aware of potential extra costs that may surface, depending on the nature of the application. If more time is required to process and/or respond to an application than that stated above (eg the application is large and requires a large amount of input, requires a Cultural Impact Assessment, or the attention of multiple staff members) the applicant will be charged at an hourly rate. Ngāti Rangi Trust will inform the applicant of any such costs before incurring them. Ngāti Rangi Trust will inform the applicant if there is a requirement for a Cultural and Environmental Monitor (mainly for filming, academic research, or any proposed activity occurring on the maunga). This will require a separate payment to the Cultural and Environmental Monitor, and may include travel costs.

TIMEFRAME

In order for adequate review of an application and consideration for a formal response, Ngāti Rangī Trust should be given adequate time to process an application. An additional fee may be paid if an applicant wishes for their request to be processed urgently.

PAYMENT

The following payment options are available to applicants:

- internet banking;
- cash; or
- bank deposit.

Please enquire at the Ngāti Rangī Trust office for payment details.



Artwork by Amohera Richards



Artwork by Koopu-te-Roirangi Mareikura Heta

NGĀTI RANGI TRUST RESOURCE CONSENT OR CONCESSION APPLICATION CONSULTATION FORM



A. APPLICANT DETAILS

ORGANISATION:	
ADDRESS:	
APPLICANT:	
POINT OF CONTACT:	
PHONE:	
MOBILE:	
EMAIL:	

B. PROPOSED ACTIVITY

- *Where (exactly) will the activity be taking place*
- *What will be involved*
- *Who will be involved*
- *Duration of the activity – start and finish date required*
- *Is this a new application, or a renewal of an existing consent?*



C. POTENTIAL ENVIRONMENTAL EFFECTS

In detail describe the actual and potential environment effects resulting from this activity

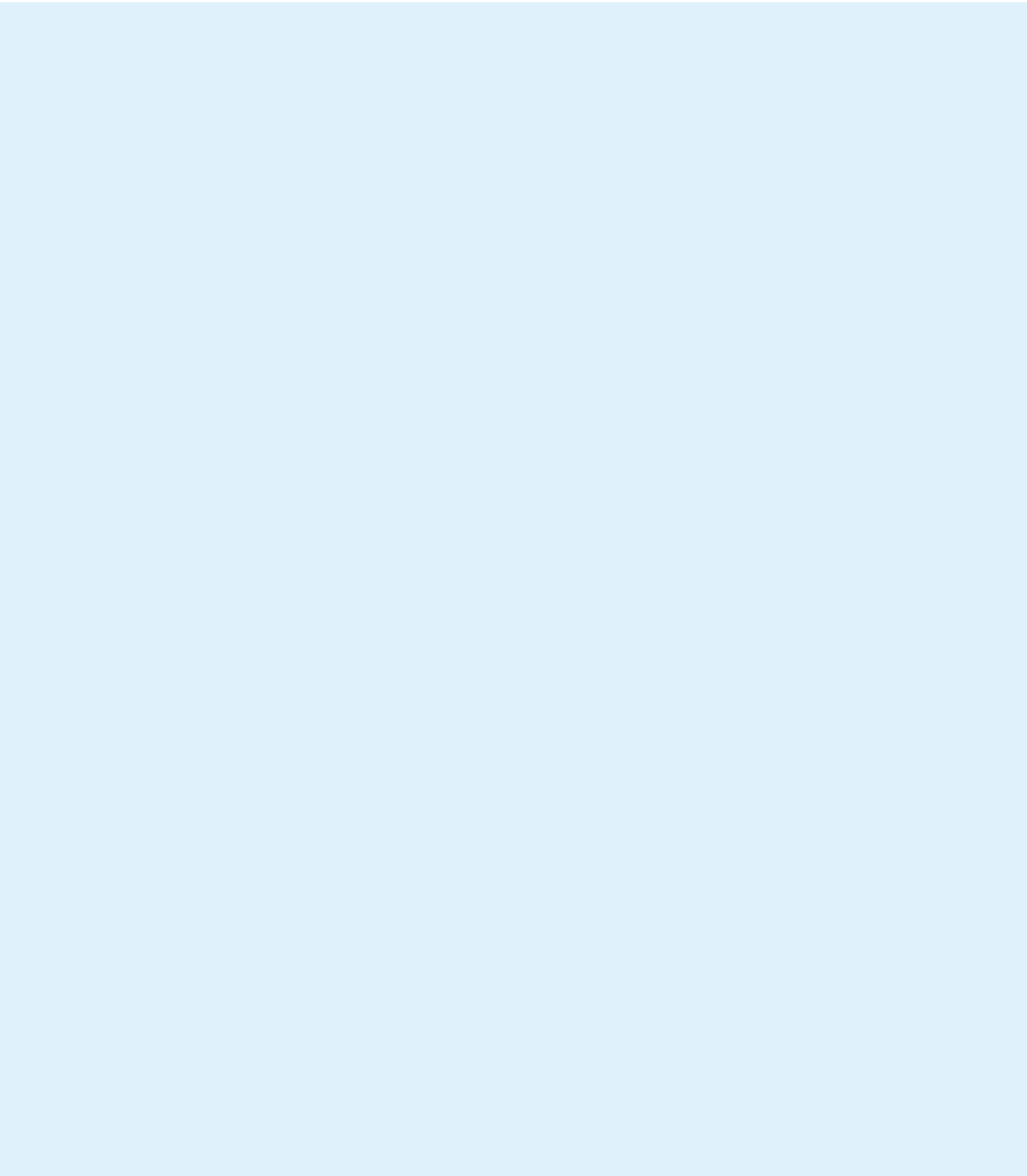
- *Will it be taking place near waterways? If so where?*
- *How will it impact on water bodies?*
- *Will there be earthworks? If so how much?*
- *Will this activity impact on native flora and fauna? If so, please describe.*
- *Will this activity take place on unmodified land?*
- *It is our principle to leave the environment in a better state than we found it in. How do you propose to do this in the context of your project? Examples include funding stoat traps to protect whio and kiwi, planting or fencing a stream, building a lizard home near your project, etc.*



D. POTENTIAL CULTURAL IMPACTS

In detail please describe the actual and potential cultural impacts resulting from this activity. Consider the following points when describing this section.

- *Ngāti Rangī as an iwi*
- *Our connections to our ancestral water bodies*
- *Our connections to our ancestral lands*
- *Our connections to our ancestral maunga*
- *Native flora and fauna*
- *Cultural traditions and activities*
- *Mouri of the area*



E. MITIGATION MEASURES

For the actual and potential impacts stated in points c and d please describe in detail the proposed measures that will be taken to mitigate, avoid or remedy the impact.

[Large empty light blue box for mitigation measures]

F. SIGNATURE

Signing this document indicated to Ngāti Rangī Trust that the information you have provided is true and accurate.

Applicant's Name:

Signature:

Date:





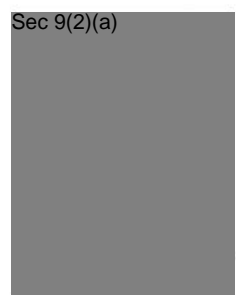




CONSERVATION PARTNERSHIP AGREEMENT (TE MANA PAENGA)

DOCCM-5948533

Sec 9(2)(a)



CONSERVATION PARTNERSHIP AGREEMENT (TE MANA PAENGA)

Agreed by

The Crown, through the Minister of Conservation and the Director-General

And

**The Trustees of Te Tōtarahoe o Paerangi, being the Ngāti Rangi
post-settlement governance entity through the Ngāti Rangi Deed of
Settlement**

1. BACKGROUND

- 1.1 The Crown and the trustees of Te Tōtarahoe o Paerangi (the "Governance Entity") have agreed that the relationship redress offered by the Minister of Conservation will include this partnership agreement, to be known as Te Mana Paenga, between the Governance Entity and the Department of Conservation (the "Department").
- 1.2 Te Mana Paenga will be based on and incorporate the Tuia ki te Mana principles set out below.

2. NGĀTI RANGI

- 2.1 Ngāti Rangi operates to, holds to, maintains and has the following principles, values, vision and goals:

2.1.1 Ngāti Rangi operates across all their mahi according to a set of principles:

Ko te Kāhui Maunga te mātāpuna o te ora - We understand that the Kāhui Maunga is the source of our origin and well-being as Ngāti Rangi

Me karioi te noho - We understand that we, as Ngāti Rangi, are here forever

Kia mana ai ngā kōrero tuku iho - We understand that the teachings of our tūpuna are upheld

Ko te anga whakamua ki apopo - We understand that decisions must be future focussed

2.1.2 Ngāti Rangi holds to the following values across all their mahi:

Kia MANA ai nga mahi - To act with integrity and honour

Ki mau ai ki te MANAAKITANGA - To care wholeheartedly

Kia tika ai to TURANGAWAEWAE - To be accountable

Kia u ai ki nga TIKANGA - To be duty bound

Kia rapu ai i te MEA NGARO - To unleash potential

- 2.2 Ngāti Rangi has determined a vision for the iwi that reaches across all its work and decision-making. That vision is:

Kia mura ai te ora o Ngāti Rangi nui tonu ki tua atu i te 1,000 tau - That Ngāti Rangi continues to vibrantly exist in 1,000 years.

- 2.3 In 2014 Ngāti Rangi launched its Strategic Plan for 2035. These goals included:

A healthy environment sustainably cared for by Ngāti Rangi

A healthy, connected natural world sustainably cared for and used by Ngāti Rangi

3. PURPOSE OF TE MANA PAENGA

- 3.1 Te Mana Paenga sets out how the Department and the Governance Entity will work together:

3.1.1 **in the spirit of partnership required under Te Tiriti o Waitangi/the Treaty of Waitangi;**

3.1.2 **in a manner that recognises and respects the kawa, tikanga and ritenga of Ngāti Rangi;**

3.1.3 **in a manner that furthers the intention of the Conservation Partnership Framework set out in Rukutia Te Mana – the Ngāti Rangi Deed of Settlement; and**

3.1.4 **to fulfil the agreed strategic objectives across Te Mana Paenga Area as outlined in Schedule 1.**

4. TUIA KI TE MANA PARTNERSHIP PRINCIPLES

- 4.1 Te Mana Paenga, between the Department and the Governance Entity, will operate under the following Tuiā ki te Mana partnership principles:

4.1.1 **kia mau ki te wairua o Te Tiriti o Waitangi: Uphold the spirit of the Treaty of Waitangi;**

4.1.2 **maintain a 'no surprises' approach;**

4.1.3 **acknowledge that the relationship is evolving, not prescribed;**

4.1.4 **work in a spirit of cooperation to achieve joint outcomes;**

4.1.5 **address issues and discuss disagreements openly and directly when they arise; and**

4.1.6 **recognise and acknowledge that the Parties benefit from working together by sharing their vision, knowledge and expertise.**

5. ROLES AND RESPONSIBILITIES

- 5.1 The Governance Entity, the Minister and the Director-General are committed to the restoration and protection of the health and wellbeing of public conservation land in Te Mana Paenga Area, for present and future generations.
- 5.2 Ngāti Rangi have, since time immemorial, maintained mana motuhake and exercised rights and responsibilities in relation to their rohe and to their whanaunga in accordance with their kawa, tikanga and ritenga.
- 5.3 Ngāti Rangi's rohe or tribal domain includes their whenua, maunga, awa and other taonga (lands, mountains and rivers and their surrounds), which are central to Ngāti Rangi's existence and survival and to their health and wellbeing, both physically and spiritually. The landscape is filled with sites reflecting Ngāti Rangi's ancient association with the whenua, named by or for significant Ngāti Rangi tūpuna and historical events.

I ahu mai te reo rākei kura i ngā tongi kura o te ao nei

The poetry of language and culture is a reflection of the poetry of the landscape

- 5.4 Sacred sites within Ngāti Rangi's rohe include nationally significant and iconic sites and places, including Ngāti Rangi's sacred maunga Ruapehu (situated within the Tongariro National Park), the Whangaehu River, known as Te Waiū o Te Ika, the Waiōuru Defence Lands and Tangiwai. As well as being of deep spiritual importance to Ngāti Rangi, these places are also of particular importance to Aotearoa/New Zealand's cultural and environmental heritage and economic development.
- 5.5 The Department's functions include managing "for conservation purposes, all land, and all other natural and historic resources" under the Conservation Legislation. In administering the Conservation Legislation, the Department must give effect to the principles of Te Tiriti o Waitangi/the Treaty of Waitangi in accordance with section 4 of the Conservation Act 1987.
- 5.6 The Ngāti Rangi settlement includes redress that together forms a Conservation Partnership Framework which provides that:
- 5.6.1 Ngāti Rangi will, on an interim basis, nominate a person for appointment by the Minister of Conservation to the Tongariro-Taupō Conservation Board;
- 5.6.2 Ngāti Rangi will, in conjunction with the Department, prepare a "place" within the Tongariro-Taupō Conservation Management Strategy relating to Te Paenga Nui as defined in clause 8.179 of the Deed of Settlement;
- 5.6.3 Ngāti Rangi will together with the Department jointly administer 8750 hectares of public conservation land as part of Te Pae Ao; and
- 5.6.4 Ngāti Rangi will be granted Te Tāpora - an overlay classification, statutory acknowledgements and deeds of recognition in relation to key sites within the Ngāti Rangi rohe.

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5.7 Te Mana Paenga forms part of the Conservation Partnership Framework in order to foster the development of a positive, collaborative and enduring relationship into the future.

6. COMMUNICATION

6.1 The Parties will maintain open, effective and efficient communication with each other on an ongoing and no surprises basis by:

6.1.1 maintaining a record of each other's office holders, and their contact details;

6.1.2 advising each other of their principal contacts and their contact details;

6.1.3 promptly informing each other of any changes to the contact information;

6.1.4 recognising the utility of upskilling each other's personnel on key matters relating to either party, including Ngāti Rangī's association and connection with their whenua, maunga, awa and other taonga;

6.1.5 meeting regularly on issues of shared interest that relate to Te Mana Paenga Area in accordance with the commitments in this Agreement and as agreed by Governance Entity and the Department;

6.1.6 taking a proactive approach to communication which reflects the intention and spirit of Te Mana Paenga; and

6.1.7 advising each other of any matters of significance to either party that relate to Te Mana Paenga Area.

7. STRATEGIC COLLABORATION AND SPECIFIC PROJECTS

7.1 As soon as is practicable after the signing of this Te Mana Paenga, the Parties will meet to agree long-term strategic objectives for their relationship.

7.2 Thereafter, the Governance Entity will meet with senior staff of the Department within Te Mana Paenga Area at least once a year. At these meetings, the Parties will determine whether further meetings involving senior managers of the Department and the Governance Entity are required on particular issues.

7.3 Business planning processes determine the Governance Entity's and the Department's work priorities and commitments for the year. For the Department, responsibility for business planning processes largely sits with the District Managers. The relevant District Managers and representatives of the Governance Entity will meet at an early stage in their annual business planning processes to:

7.3.1 discuss priorities and commitments for the new financial year, including the likely funding available for operations on lands administered by Te Pae Ao;

7.3.2 discuss, and where appropriate agree to, opportunities for the Governance Entity to undertake operational activities, such as species

work and pest control, with respect to the land administered by Te Pae Ao in accordance with clause 8.158 of the Deed of Settlement.

- 7.3.3 discuss timeframes for the development of annual work programmes;
 - 7.3.4 identify potential specific projects to be undertaken together or separately that are consistent with the strategic objectives for the relationship;
 - 7.3.5 discuss the Department's obligations and performance in respect of Te Waiū-o-Te-Ika framework; and
 - 7.3.6 discuss the Department's regional and national priorities.
- 7.4 If a specific project is undertaken, the Department and the Governance Entity will determine the nature of their collaboration on that project which may include finalising a work plan for that project. If a specific project is not undertaken, the Parties will advise one another of the reason(s) for this.
- 7.5 As part of annual discussions, and as part of ongoing dialogue, the Parties will advise each other of:
- 7.5.1 any significant changes that have occurred or are proposed (including structural, legislative, policy or administrative changes) regarding how either party is working in Te Mana Paenga Area;
 - 7.5.2 potential opportunities for applying for funding for conservation purposes from external sources (either jointly or individually with the support of the other party);
 - 7.5.3 potential opportunities for applying for funding for conservation purposes from contestable funds administered through Vote: Conservation, e.g. Ngā Whenua Rāhui (either jointly or individually with the support of the other party); and
 - 7.5.4 the status of any statutory or non-statutory planning documents that have an impact in Te Mana Paenga Area, including any planned or potential reviews.
- 7.6 Each year, the Parties will provide a letter or similar form of written advice to the other that describes the work that party has carried out in that financial year to achieve the strategic objectives for the relationship.

8. CROSS-ORGANISATIONAL OPPORTUNITIES

- 8.1 As part of the annual business planning process, the Parties will discuss:
- 8.1.1 opportunities and processes to share scientific and cultural resource and information, including data and research material (including to assist the Governance Entity to exercise their role under the Deed of Settlement and as kaitiaki);
 - 8.1.2 opportunities for developing mutual understanding and developing relationships, with respect to conservation, environmental and cultural

matters within Te Mana Paenga Area. Options may include wānanga, education, training, development and secondments;

8.1.3 opportunities to be involved or to nominate individuals to take part in relevant training initiatives run by the Parties, including potential opportunities for full time positions, holiday employment or student research projects which may arise within Te Mana Paenga Area. The Governance Entity may propose candidates for these roles or opportunities;

8.1.4 opportunities to share operational resources to support the work of Te Pae Ao; and

8.1.5 staff changes and key contacts in each organisation.

8.2 Where appropriate, the Department will consider using the Governance Entity individuals or entities as providers of professional services. Normal conflict of interest processes will be implemented to avoid a perceived or actual conflict of interest.

9. STATUTORY PLANNING DOCUMENTS

9.1 The Department and the Governance Entity will meet to identify and seek to address issues affecting Ngāti Rangi at an early stage (before public consultation, if any, and throughout the process) in the preparation, review or amendment of any statutory planning document within Te Mana Paenga Area.

9.2 The Parties acknowledge the different process required for the development of a "place" in the Tongariro-Taupō Conservation Management Strategy as provided for in the Deed of Settlement.

10. CONSULTATION

10.1 Where consultation is required under Te Mana Paenga, the Department will:

10.1.1 ensure that the Governance Entity is consulted as soon as reasonably practicable following the identification of the proposal or issues to be the subject of the consultation;

10.1.2 provide the Governance Entity with sufficient information and time to make informed comments and/or submissions in relation to any of the matters that are subject of the consultation;

10.1.3 approach the consultation with an open mind and genuinely consider any views and/or concerns that the Governance Entity may have in relation to any of the matters that are subject to the consultation; and

10.1.4 report back to the Governance Entity on any decision that is made.

10.2 With respect to consultation concerning Whangaehu River (Te Waiū-o-Te-Ika) see clause 12.6.

11. SOUTHERN GATEWAY PROJECT

11.1 Ngāti Rangi intend to establish a Southern Gateway to the Tongariro National Park at Ohakune.

11.2 The Department and Ngāti Rangi will explore opportunities to coordinate activities and services that would support this project within Te Mana Paenga Area.

12. FRESHWATER FISHERIES AND HABITAT

12.1 Ngāti Rangi and the Department share aspirations for conservation of freshwater fisheries and habitat within Te Mana Paenga Area.

12.2 Ngāti Rangi's aspirations and conservation ethic for freshwater fisheries include the sustainable and traditional use of freshwater fisheries in accordance with Ngāti Rangi kawa, tikanga and ritenga.

12.3 The Department's statutory functions include the preservation, as far as practicable, of all indigenous freshwater fisheries, and the protection of recreational freshwater fisheries and their habitats. The Department is responsible for the regulation of whitebait fishing under the Whitebait Regulations. Its work also focuses on national priority fisheries and habitats that are located on public conservation land, national priority species and biosecurity issues. In all other areas, advocacy for the conservation of freshwater fisheries is undertaken primarily through Resource Management Act processes.

12.4 The Parties will co-operate in the conservation of freshwater fisheries and freshwater habitats. Establishing freshwater aims in the strategic objectives for the relationship will ensure that actions towards these are integrated into the annual business planning processes.

12.5 The Parties may agree on actions that include areas for co-operation in the protection, restoration and enhancement of riparian vegetation and habitats; and the development or implementation of research and monitoring programmes.

Whangaehu River (Te Waiū-o-Te-Ika) catchment

12.6 The Department acknowledges the significance of the Whangaehu River (Te Waiū-o-Te-Ika) to Ngāti Rangi as manifested through their settlement. The Department has specific settlement obligations with respect to the Whangaehu River (Te Waiū-o-Te-Ika) and the associated framework and catchment document. Strategic objectives discussions will include actions in the business plan to collaborate on developing Departmental processes to ensure the Department meets its obligations to:

12.6.1 recognise and provide for Te Waiū-o-Te-Ika framework;

12.6.2 have particular regard to Te Tāhoratanga o Te Waiū;

12.6.3 recognise the Governance Entity's standing with respect to the Whangaehu River (Te Waiū-o-Te-Ika) in accordance with clauses 8.21 to 8.25 of the Deed of Settlement; and

- 12.6.4 engage with Ngā Wai Tōtā o Te Waiū including through attendance at any biennial hui/meeting convened under clause 8.45.2(b) of the Deed of Settlement.

13. FLORA AND FAUNA

- 13.1 The Parties share aspirations of protecting ecosystems and indigenous flora and fauna within Te Mana Paenga Area. These aspirations will be reflected in the strategic objectives for the relationship.
- 13.2 The Department aims to conserve the full range of New Zealand's ecosystems, maintain or restore the ecological integrity of managed sites, and ensure the survival of threatened species, in particular those most at risk of extinction. This work involves a number of national programmes.
- 13.3 The long history of working together on Karioi Rāhui to protect and improve ecosystems through establishing a 'mainland island' with the long-term objective of reintroducing missing taonga species will be enhanced by the administering body role of Te Pae Ao.
- 13.4 In recognition of the cultural, historic and traditional association of Ngāti Rangi with indigenous flora and fauna within Te Mana Paenga Area for which the Department has responsibility, the Department will inform the Governance Entity of the national sites and species programmes on which the Department will be actively working, and provide opportunities for Ngāti Rangi to participate in these programmes.

Pest Control

- 13.5 Preventing, managing and controlling threats to natural, historic and cultural values from animal and weed pests is an integral part of protecting the unique biodiversity of New Zealand. This is done in a way that maximises the value from limited resources available to do this work.
- 13.6 Sustaining pest control within the areas administered by Te Pae Ao that have been part of Karioi Rāhui will be essential to maintaining the investment of the Parties.
- 13.7 It is envisaged that the strategic objectives for the relationship will determine the strategic outcomes sought from pest control programmes within Te Mana Paenga Area, including:
- 13.7.1 monitoring and assessment of programmes;
 - 13.7.2 early consultation with the Governance Entity on pest control activities particularly the use of pesticides within Te Mana Paenga Area;
 - 13.7.3 regularly discussing and reviewing options for pest control; and
 - 13.7.4 co-ordination of pest control where the Governance Entity is the adjoining landowner.
- 13.8 The Parties will, through the annual business planning process, create actions to progress these strategic objectives.

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14. TAONGA MINERALS

- 14.1 The Parties acknowledge the redress provided for the taonga minerals of pākohe (including pākere), onewa and matā.
- 14.2 The Parties will share information about the location and availability of the taonga minerals to assist with the implementation of the redress in accordance with the Deed of Settlement and Ngāti Rangi Claims Settlement Act 2019.

15. STATUTORY AUTHORISATIONS

- 15.1 The strategic objectives for the relationship will guide the Parties to determine appropriate engagement on statutory authorisations within Te Mana Paenga Area.
- 15.2 Ngāti Rangi's involvement in identifying strategic objectives will be informed by the *Ngāti Rangi & Concessions Guidance* document or its successors.
- 15.3 As part of these strategic objectives, the Governance Entity and the Department will identify categories of statutory authorisations that may impact on the cultural, traditional and/or historic values of Ngāti Rangi. These categories will be reviewed on a continuing basis. In the identified categories, the Department will:
 - 15.3.1 advise and encourage all prospective applicants within Te Mana Paenga Area to consult the Governance Entity before filing their application; and
 - 15.3.2 consult the Governance Entity at an early stage on such categories of authorisations or renewal of authorisations within Te Mana Paenga Area.
- 15.4 As the Department works within time limits to process statutory authorisations applications, at the earliest opportunity it will notify the Governance Entity (as part of the meetings referred to in clause 7.2) of the time frames for providing advice on impacts on the cultural, spiritual and historic values of Ngāti Rangi.
- 15.5 Before issuing statutory authorisations to carry out activities on land managed by the Department within Te Mana Paenga Area, the Department will encourage communication between the applicant for the statutory authorisation and the Governance Entity.
- 15.6 When issuing or renewing statutory authorisations that give authority for other parties to manage land administered by the Department, the Department will:
 - 15.6.1 require the third parties to manage the land according to the standards of conservation best practice; and
 - 15.6.2 encourage third parties to consult with the Governance Entity before using cultural information of Ngāti Rangi.
- 15.7 It is expected that the strategic objectives for the relationship will guide the Parties to determine potential opportunities for the Governance Entity to obtain statutory authorisations on public conservation land within Te Mana Paenga Area.

Te Pae Ao concessions process

15.8 The Department and the Governance Entity will work together to ensure the process for the granting of concessions by Te Pae Ao provides for Ngāti Rangī kawa, tikanga and ritenga to be respected and understood.

16. STATUTORY LAND MANAGEMENT

16.1 The strategic objectives for the relationship will guide the Parties' engagement on statutory land management activities within Te Mana Paenga Area. Ngāti Rangī have an ongoing interest in the range of statutory land management activities that are occurring within Te Mana Paenga Area.

16.2 The Department and the Governance Entity will identify the categories of statutory land management activities that have potential to affect the cultural, spiritual, historic values and sites of significance of Ngāti Rangī, and will identify when consultation is appropriate. This includes when the Minister is considering:

16.2.1 vestings or management appointments for reserves held under the Reserves Act 1977;

16.2.2 other management arrangements with third parties;

16.2.3 changing reserve classifications;

16.2.4 changing the name of or naming any area of land managed by the Department; or

16.2.5 land disposal.

16.3 If there are proposals to change the status or classification of reserve sites administered by Te Pae Ao, the process set out in clauses 8.167 to 8.173 of the Deed of Settlement and sections 97 and 101 of the Ngāti Rangī Claims Settlement Act 2019 will be followed.

16.4 Before vesting or making an appointment to control and manage a reserve under the Reserves Act for a Ngāti Rangī site of significance, the Department will discuss with the Governance Entity whether it wishes to be given such a vesting or appointment subject to agreed conditions (if any).

17. CULTURAL MATERIALS

17.1 The Minister and/or Director-General will work in partnership with the Governance Entity to develop and agree a process to authorise members of Ngāti Rangī to access and use cultural materials within Te Mana Paenga Area when required for cultural purposes, in accordance with the relevant legislation. Where it is consistent with conservation objectives and relevant legislation, multi-site and/or multi-take authorisations may be granted.

17.2 The Department will:

17.2.1 consult the Governance Entity whenever there are requests from other persons to take plants and plant materials from Te Mana Paenga Area;

- 17.2.2 if requested by the Governance Entity, assist as far as reasonably practicable, members of Ngāti Rangi to obtain plants for propagation;
 - 17.2.3 provide, as far as reasonably practicable, ongoing advice to the Governance Entity on the establishment of its own cultivation areas, and managing and propagating plants; and
 - 17.2.4 waive any authorisation costs for plants or plant materials applications made by the Governance Entity or members of Ngāti Rangi.
- 17.3 The Department will, as far as reasonably practicable, provide the Governance Entity with access to cultural materials that become available as a result of Department operations such as track maintenance or clearance, or culling of species, or where materials become available as a result of accidental death, through natural causes or otherwise.

18. SITES OF SIGNIFICANCE/WĀHI TAPU - WĀHI TŪPUNA

- 18.1 The Parties recognise that there are wāhi tapu, wāhi tūpuna and sites of significance to Ngāti Rangi on lands managed under Conservation Legislation.
- 18.2 The Department will work with the Governance Entity to respect Ngāti Rangi kawa, tikanga and ritenga attached to wāhi tapu, wāhi tūpuna and other places of significance that have been identified in accordance with clause 18.3 on lands administered by the Department within Te Mana Paenga Area by:
- 18.2.1 discussing with the Governance Entity practical ways in which Ngāti Rangi can exercise kaitiakitanga over ancestral lands, natural and historic resources and other taonga managed by the Department within Te Mana Paenga Area;
 - 18.2.2 managing, in co-operation with Governance Entity, sites of historic significance to Ngāti Rangi according to standards of conservation practice which care for places of cultural heritage value, their structures, materials and cultural meaning as outlined in the International Council on Monuments and Sites (ICOMOS) New Zealand Charter 1983;
 - 18.2.3 informing the Governance Entity if kōiwi or taonga tūturu are found within Te Mana Paenga Area; and
 - 18.2.4 assisting in recording and protecting wāhi tapu, wāhi tūpuna and other places of cultural significance to Ngāti Rangi and seeking to ensure they are not desecrated or damaged.
- 18.3 The Parties will develop a process for advising one another of sites of significance, wāhi tapu and wāhi tūpuna. Information relating to sites of significance to Ngāti Rangi will be treated in confidence by the Department, to preserve the wāhi tapu and wāhi tūpuna nature of places, unless otherwise agreed by the Governance Entity but subject to the Official Information Act 1981 and other relevant Acts.

Ngā Urukehu Pouwhenua/Interpretation

- 18.4 The Department acknowledges that Ngāti Rangi may wish to, at their own cost, create and erect a pouwhenua and/or interpretation material in the part of the

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Ngaurukehu Scientific Reserve to which their Statutory Acknowledgment relates, to acknowledge the Kōkako Hui of 1860.

- 18.5 The Department will discuss with Ngāti Rangi a mutually acceptable location and design for the pouwhenua and interpretation material, and work together on arrangements for access to the agreed site.

19. VISITOR AND PUBLIC INFORMATION

- 19.1 Ngāti Rangi and the Department wish to share knowledge about natural and historic heritage within Te Mana Paenga Area with visitors and the general public. This is important to increase enjoyment and understanding of this heritage, and to develop awareness of the need for its conservation.
- 19.2 Ngāti Rangi hold to the following proverb and have a particular aspiration to restore their kōrero and language to the local landscape and national consciousness:

I ahu mai te reo rākei kura i ngā tongi kura o te ao nei

The poetry of language and culture is a reflection of the poetry of the landscape

- 19.3 The Parties wish to encourage respect for and awareness of the cultural, spiritual, traditional and historic association of Ngāti Rangi with their whenua, maunga, awa and other taonga within Te Mana Paenga Area, and the responsibility of Ngāti Rangi as kaitiaki under their kawa, tikanga and ritenga to preserve, protect and manage the natural and historic resources within that area.
- 19.4 The Parties will do this by:
- 19.4.1 raising public awareness of positive conservation relationships developed between the Parties;
 - 19.4.2 engaging with each other in the development of visitor and public information published by either party that relates to Ngāti Rangi values associated with land and resources managed under Conservation Legislation, particularly where that information relates to Ngāti Rangi sites of significance and associations to the land;
 - 19.4.3 the Department obtaining from the Governance Entity an assurance that information relating to Ngāti Rangi to be contained in a publication of the Department is accurate and appropriate;
 - 19.4.4 the Department obtaining the consent of the Governance Entity for the disclosure of information received from the Governance Entity relating to Ngāti Rangi values but subject to the Official Information Act 1981 and other relevant Acts;
 - 19.4.5 exploring opportunities for Ngāti Rangi to install pouwhenua or other cultural interpretation at significant places on public conservation land; and

19.4.6 the Department consulting the governance entity before using information about Ngāti Rangi values for new interpretation panels, signs and other visitor publications.

20. CONSERVATION ADVOCACY

20.1 The Governance Entity and the Department each have concerns with the effects of activities controlled and managed under the Resource Management Act 1991 and other legislation.

20.2 Areas of common concern include:

20.2.1 protection and maintenance of reserves and other protected lands;

20.2.2 management of rivers, streams, wetlands and waterways, including the Whangaehu River (Te Waiū-o-Te-ika); and

20.2.3 the effects of natural phenomena (including volcanic phenomena) management on people, infrastructure, public conservation land and other natural resources in Te Mana Paenga Area.

20.3 From time to time the Parties will seek to identify further issues of likely mutual interest and/or concern for discussion. It is recognised that the Department and the Governance Entity will continue to have the freedom to make separate submissions in any Resource Management Act processes.

Volcanic natural phenomena (hazard) management

20.4 Because of the potential impact of lahar and other volcanic activity on land and resources within Te Mana Paenga Area, and the high cultural significance of Te Wai ā-moe (the source of the Whangaehu River), the Department recognises the desire of Ngāti Rangi to be involved in management of volcanic natural phenomena.

20.5 The Department will:

20.5.1 consult with Ngāti Rangi on natural hazard planning documents led by the Department that impact on Te Mana Paenga Area, including the 'Guidelines for DOC's response to Volcanic Activity in Tongariro National Park' and 'Initial Response Plan for Volcanic Activity'; and

20.5.2 where possible provided technical or other non-financial support to assist Ngāti Rangi to participate in the Central Plateau Volcanic Advisory Group or similar bodies.

21. DISPUTE RESOLUTION

21.1 If a dispute arises in connection with Te Mana Paenga, every effort will be made in good faith to resolve matters at a local level within a reasonable timeframe to endeavour to find a resolution to the matter.

21.2 If this process is not successful, the matter may be escalated to a meeting of the Department's relevant third tier manager and the Chair of the Governance Entity who will meet within a reasonable timeframe.

21.3 If following the process in clause 21.2 the Parties cannot reach a negotiated outcome, they may agree to refer the dispute to an independent and mutually agreed mediator. The costs of mediation are to be split equally between the Parties.

21.4 If the Dispute is not resolved following mediation, and the Parties agree that the matter is of such significance that it requires the attention of the Governance Entity and the Minister of Conservation, then that matter will be escalated to a meeting between a nominated representative of the Governance Entity and the Minister (or their nominees). The Parties acknowledge this measure will be a means of last resort.

22. REVIEW AND AMENDMENT

22.1 The Parties agree that Te Mana Paenga is a living document that should be updated and adapted to take account of future developments, additional co-management opportunities and the ongoing operation of the Conservation Partnership Framework as an integrated framework.

22.2 If requested by either party, the first review of Te Mana Paenga will take place no later than three years after the date Te Mana Paenga is signed, and if requested by either party will be reviewed every three years thereafter. Any review of Te Mana Paenga will take into account the matters identified at clause 22.1.

23. TERMS OF AGREEMENT

23.1 Te Mana Paenga is entered into pursuant to clause 7.6.2 of the Deed of Settlement. Te Mana Paenga does not override or limit:

23.1.1 legislative rights, powers or obligations;

23.1.2 the functions duties and powers of the Minister of Conservation, Director-General or any other officials or statutory officers of the Department; or

23.1.3 the ability of the Crown to introduce legislation and change government policy.

23.2 Te Mana Paenga does not have the effect of granting, creating or providing evidence of an estate or interest in, or rights relating to:

23.2.1 land or any other resource held, managed or administered under the Conservation Legislation; or

23.2.2 flora or fauna managed or administered under Conservation Legislation.

23.3 A breach of Te Mana Paenga is not a breach of the Deed of Settlement.

23.4 If the Crown breaches Te Mana Paenga without good cause, the Governance Entity may:

23.4.1 seek a public law remedy, including judicial review; or

23.4.2 subject to the Crown Proceedings Act 1950, seek to enforce Te Mana Paenga but damages or compensation (with the exception of court costs) may not be awarded.

23.5 Clause 23.4 does not apply to any contract entered into between the Department and the Governance Entity, including any independent contract for service or a concession.

24. DEFINITIONS

24.1 In this document:

- 1 **Conservation Legislation** means the Conservation Act 1987 and the Acts listed in Schedule 1 of that Act;
- 2 **Conservation Partnership Framework** means those elements of cultural redress in clauses 8.1 to 8.9 and 8.129 to 8.185 of the Deed of Settlement;
- 3 **Crown** has the meaning given to it in section 2(1) of the Public Finance Act 1989;
- 4 **Cultural materials** mean plants, plant materials, dead protected wildlife or parts thereof for which the Department is responsible within Te Mana Paenga Area and which are important to Ngāti Rangī in maintaining and expressing their cultural values and practices;
- 5 **Deed of Settlement** means the deed of settlement between Ngāti Rangī and the Crown;
- 6 **Department** means the Minister of Conservation, the Director-General and the Departmental managers to whom the Minister of Conservation's and the Director-General's decision-making powers can be delegated;
- 7 **Governance Entity** has the meaning set out in the Deed of Settlement;
- 8 **Kaitiaki** means guardian in accordance with tikanga Ngāti Rangī;
- 9 **Ngāti Rangī** has the meaning set out in the Deed of Settlement;
- 10 **Te Mana Paenga** means this Conservation Partnership Agreement; and
- 11 **Te Mana Paenga Area** is the shaded area shown in OTS-083-034 and reproduced in Schedule 1.

AGREED on 7th September 2019

SIGNED for and on behalf of
HER MAJESTY THE QUEEN
in right of New Zealand by the
Minister of Conservation
in the presence of:

)
)
)
)
)

E M Sage



Signature of Witness

Sarah Owen

Witness Name

Private Secretary

Occupation

Bowen House, Lambton Quay

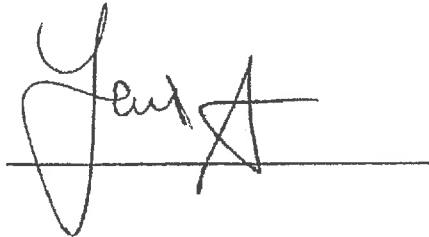
Address

Wellington

AGREED on

SIGNED for and on behalf of
THE CROWN
by the
Director-General of Conservation
in the presence of:

)
)
)
)
)



Am Griffiths
Signature of Witness


SANDRA GRIFFITHS
Witness Name

EA
Occupation

CI-DOC Wgtn
Address

SIGNED for and on behalf of the
trustees of **TE TŌTARAOE O**
PAERANGI
by the Chair
in the presence of:

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Sec 9(2)(a)


Sec 9(2)(a)

Signature of Witness

Chairperson/Deputy Chairperson

ELISABETH RUIE
Witness Name

PROJECT MANAGER
Occupation

KAETIHI
Address

DOCCM-5948533

Sec 9(2)(a)


6 Hakihea 2023

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Tēnā koe Anna

WORK APPROVAL, 1a Movenpick and Parkland upgrades

Works approval by Ruapehu Alpine Lifts and Lines Company (RAL) and the Lines Company

Thank you for engaging with Ngā Waihua o Paerangi Trust. Our response is based on the documents provided and on four site visits over November/December 2023. Although these works approval applications are from two different companies, we are treating them together. This is because the work involved is for the same purpose, and because both the Lines Company and RAL works have to be carried out in order for RAL to meet their objectives.

The Trust has several environmental and cultural concerns over the project, as set out below.

Effects on the alpine flush

There are two sections of alpine flush within the Turoa Ski Field (see map). The most prominent section is next to the café and carpark. Another section is along the Mangawhero stream starting immediately below the lower excavation site for the Parklane chair lift. Both sections have high scientific, aesthetic, ecological and geological values. "Wetlands supporting rare indigenous flora" get particular mention in the Horizons One Plan and the Ruapehu District Plan when describing why Tongariro National Park is an Outstanding Natural Feature and Landscape. While there are larger and less disturbed alpine flushes on the slopes of Ruapehu, these flushes on the Turoa ski-field are the most accessible.

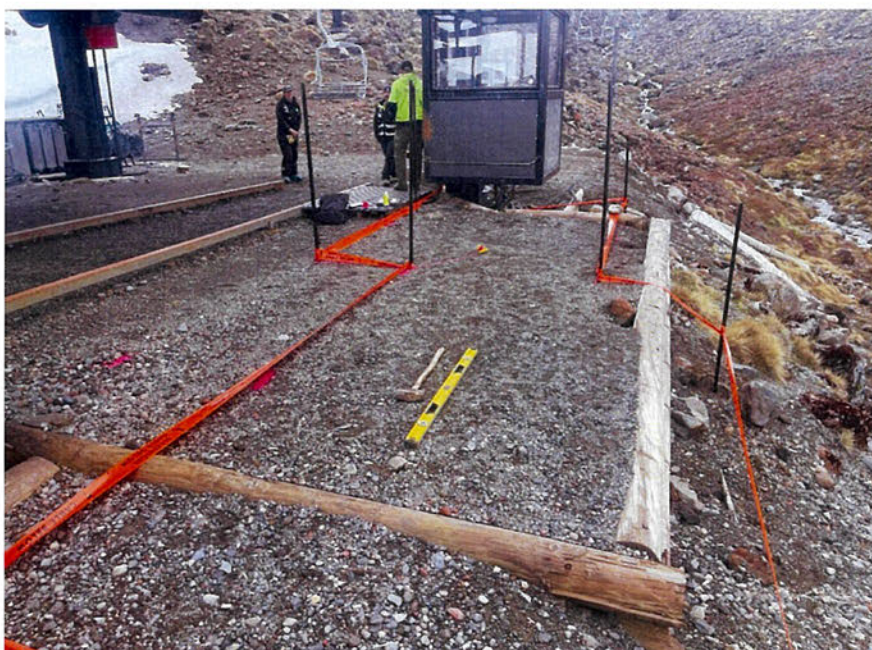
The Mangawhero stream where one of the flushes is located flows into the Whangaehu River. This is our most significant awa culturally and spiritually due to its origin and the different qualities it provides for our people; wai ora, wai tapu, wai mouri, wai mana and wai mate. Te Waiū-o-Te-Ika upholds the mana of the statutory recognition of the Whangaehu River and all its tributaries as a catchment-based approach, an indivisible whole.

Because of the special significance of Te Waiū-o-Te-Ika and in keeping with Te Mana o Te Wai framework, our first priority is the health of the wai and the awa.

In their application, Ruapehu Alpine Lifts (RAL) has stated that there are no alpine plants where the earthworks will take place. It is concerning that no mention is made of alpine plants immediately down slope from the earthworks site. These will invariably be affected by silt from the earthworks. On the site visit on 14 December RAL representatives acknowledged the importance of the wetland directly below the ski lifts, and listed ways they could mitigate damage.

Structure of retaining wall

According to discussions with RAL staff on a site visit, the present wooden retaining wall on the downhill side of the ski lifts closest to the Mangawhero (photo) will be replaced by a concrete wall. The existing wooden wall (photo) blends better with the natural environment. When I mentioned this, RAL representatives told me that a rock wall would be built to cover this. They will be using an expert in rock wall construction to build this. This would be satisfactory, if the concrete is totally hidden from sight, and if the rock wall is built to the same standards as the existing ones.



Expansion of the environmental footprint

RAL want to make the operations buildings bigger, and also excavate to allow them to have a cellar. This will invariably expand on their footprint, which is contrary to Ngāti Rangi's *Taiao Management Plan*. Section 7.1.2 states that Ngāti Rangi considers it 'inappropriate and unacceptable to expand or increase infrastructure on the maunga'. Koro Ruapehu is our ancestral maunga and the source of our identity.

Mitigation

Our personal preference is for no further construction at all on Koro Ruapehu, in keeping with our *Taiao Management Plan*. However, we understand that compliance requirements and the necessity to sell the business require an upgrade of the operations buildings. We are therefore prepared to allow the works to go ahead provided mitigation is made to ensure RAL reduce their environmental footprint in other places on the mountain.

In view of the cultural and environmental importance of the Turoa Alpine flushes, we would require the following mitigation measures from RAL to protect these habitats from further degradation. We are concerned that RAL are not presently doing all they can to protect the flushes.

1. Prevent damage directly resulting from the earthworks

This means all silt will need to be trapped and removed from the mountain before it reaches the Mangawhero Stream section of the flush. A retaining wall that blends into the natural features of the maunga must be installed to prevent silt washing into the flush. Any concrete wall must be covered by a rock wall established by an expert that blends into the existing rock structure.

The same applies to trenching and expansion of the transformer by the Lines Company though the disruption will not be as great. The concrete base used for the current transformer needs to be removed from the mountain, something the Lines Company representatives agreed upon during the 14 December site visit.

2. Stop allowing water discharge from the cafeteria

There is a pipe running from the cafeteria which discharges water and other waste into the flush. Although it was not discharging on 30 November during our site visit, the scouring pathway, and waste matter from the pipe can be clearly seen.



3. Stop pushing snow from the carpark into the flush.

This invariably pushes some silt as well. Another pathway for snow removal will have to be used.

4. Recycle grit used on the carpark

RAL use grit during icy conditions to prevent cars from slipping. When the snow melts, this needs to be reused in the same way that roading engineers reuse grit, and not simply be allowed to get washed onto the flush.

5. Install sumps onto the drain (photograph) leading to the pipe draining into the Mangawhero stream portion of the Flush.

These could be dug with very little cost to trap silt. Silt will need to be removed regularly and disposed of in a place that will minimise damage to the environment. At present, it is discolouring the stream and choking sensitive alpine vegetation. We acknowledge that RAL proposed this solution themselves on the 14 December site visit. During their induction RAL explained how constructing silt traps is a standard operating procedure.



6. Keep diggers away from the edge of the path running above the flush.

There were digger tracks close to the edge on this track on 30 November and on 14 December (photos below) The picture from 30 November also shows mud on the track. This was washed onto the track from upslope and needs to be collected in a sump.



7. Extend the border of the flush.

RAL need to extend the area of protection, to prevent people walking around the flush. This would in particular help with regeneration of the uphill part of the smaller

flush near the cafeteria, which is degraded (see map). Natural borders such as rock walls would be preferable to concrete.

8. Installing a hare-proof fence for the summer

This was an idea put forward by Harry Keys from DOC in 2014. There are numerous signs of browsing and scats from hares on the flushes.

9. Instituting a regular rubbish clean up.

There is rubbish by the pipe leading from the cafeteria (photo), and we found several other pieces on our site visit. Our Taiao Management plan stresses that rubbish and waste management on the maunga must be exemplary and "leaves Koro in a pristine state" (p.41).

10. Allowing monitoring

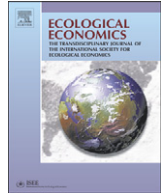
DOC used to have staff monitoring the ski field to ensure natural areas are protected, but no longer do this. We would require a commitment that RAL will provide resources for monitoring. This could be conducted either by DOC, or by Ngāti Rangi representatives. This is something we could teach our Tamariki as part of the existing Snow Academy presently supported by RAL.

In addition, Ngāti Rangi requires a whakatau (blessing to commence works) and a cultural induction before works commence. Ngāti Rangi also require cultural monitoring. Cultural monitoring could be combined with environmental monitoring if DOC are prepared to pass this responsibility to Ngāti Rangi.

Heoi ano
Sec 9(2)(a)

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Kaitātari Taiao
Ngā Waihua o Paerangi Trust



ANALYSIS

Drivers of heritage value: A meta-analysis of monetary valuation studies of cultural heritage



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ABSTRACT

Decisions about cultural and historical heritage conservation can be contentious. Improved insight into the economic benefits derived from preservation could be achieved through a better understanding of the underlying economics. In response to this challenge, a growing number of studies estimate the economic value of heritage sites. The purpose of this study is to identify common drivers of the economic value of cultural and historical heritage by conducting a meta-analysis of heritage valuation studies. We find that heritage sites in areas with higher population density hold higher value, and conservation that supports adaptive re-use of sites generates higher values than passive protection. Valuation studies of tangible heritage dominate our dataset, but our findings are robust across model specifications. We identify a need for more economic and interdisciplinary research on the value of non-built heritage to improve understanding of the composition and drivers of heritage value.

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1. Introduction

Whether or not to protect cultural and historic heritage from development interests has long been a matter of debate (McClelland et al., 2013). Heritage sites are now commonly viewed as having characteristics of a capital asset, which can help decision making about its conservation (Licciardi and Amirtahmasebi, 2012; Throsby, 1999, 2007). The economics of intangible and tangible heritage, however, remain little understood. Tangible cultural heritage refers to any specific site or location that is endowed with cultural significance; this may include a particular building or structure, an archaeological site, a natural landscape with cultural significance, or a particular location that is strongly associated with a cultural practice or traditional knowledge (e.g. a traditional fishing ground) (Throsby, 1999). Without understanding the full scope of the value generated by such sites, adverse management actions, including demolition, become much more likely (Bullen and Love, 2010). We therefore seek to identify the drivers of value of tangible heritage sites by conducting a meta-analysis of economic valuation studies of heritage sites.

Throsby (2001, 2010, 2012) developed the Cultural Capital framework to better understand the economics of cultural heritage conservation. This framework adapts the Total Economic Value framework (Pearce and Turner, 1990) from environmental economics to cultural heritage. Cultural value is a multidimensional aspect of the value of a

heritage site, and is related to attributes such as its aesthetic quality, spiritual meaning, social function, and historical significance.¹ The characteristics that make up an asset's cultural value are likely to greatly influence its economic value, although a perfect correlation between the two values is not likely. Mason (2002) also proposes that heritage is multivalent and that no single method or discipline can yield a complete assessment of heritage values. Nevertheless, economic and monetary valuation would be expected to capture much of the cultural importance of heritage qualities and cultural value (Throsby, 2012).

Adapting methods from environmental economics is a developing trend within cultural economics nonetheless, and many primary valuation studies use techniques from this field (Mourato and Mazzanti, 2002; Nijkamp, 2012). In their report, *eftec* (2005b) suggest that the uniqueness and non-substitutability of cultural assets present issues for their economic valuation. Riganti and Nijkamp (2005) note that the validity and reliability of cultural heritage valuation studies can be questioned because values are site-specific and sensitive to the valuation method used.

¹ The definition of cultural heritage provided in Article 1 of the UNESCO (1972) Convention Concerning the Protection of the World Cultural and Natural Heritage explicitly link structures and landscapes to a number of values. In its preamble, the UNESCO (2003) Convention for the Safeguarding of the Intangible Cultural Heritage recognises “the deep-seated interdependence between the intangible cultural heritage and tangible cultural and natural heritage”, and the definitions also present the tangible and intangible as inseparable. In our view, these terms are fluid rather than strictly defined and we have made no attempt to develop strict definitions. Although we attempt to remain consistent in our use of the terms, some inconsistency in usage may be perceived.

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Primary economic valuation studies have nonetheless been conducted for a wide range of tangible heritage sites. The vast majority of studies use contingent valuation methods (CVM), including pioneering studies by Grosclaude and Soguel (1994) and Willis (1994). CVM has been used to estimate the total economic value (TEV) of heritage sites (Morey and Rossmann, 2003), as well as existence values (Whitehead and Finney, 2003), bequest values (Navrud and Strand, 2002), option values (Santagata and Signorello, 2000), tourism values (Kim et al., 2007), aesthetic values (Maddison and Mourato, 2001), and place-related value (Kling et al., 2004). Fewer in number, choice experiment (CE) methods have also been used to estimate a wide range of values. The first choice experiment in this area published in 2003 was a valuation of the TEV of marble monuments in Washington DC by (Morey and Rossmann, 2003). Subsequently, CEs have been used to estimate existence values (Rolfe and Windle, 2003), bequest values (Tuan and Navrud, 2007), tourism (Riganti and Nijkamp, 2004), and place-related values (Alberini et al., 2003). The travel cost method (TCM) has been used solely to estimate the value of tourism (Melstrom, 2014; Poor and Smith, 2004), and the hedonic pricing method has been applied to aesthetic (Leichenko et al., 2001) and place-related (Hicks and Queen, 2007) values.

With such diverse applications and techniques being used, qualitative and quantitative structuring of the literature is needed to develop general insights into economic valuation of tangible heritage. Noonan (2003b) provides an annotated bibliography of contingent valuation studies, while *eftec* (2005a) provides the same for heritage valuation studies. An early value transfer study by Ulibarri and Ulibarri (2010) obtains an estimate of the heritage value of the Petroglyph National Monument, Albuquerque, New Mexico. Noonan (2003a) conducts a meta-analysis of contingent valuation studies of culture and the arts. His results suggest that a multivariate approach allows for a better description of the patterns in the literature (Noonan, 2003a).

Our study builds on these earlier exercises by updating the literature review with studies from recent years and expanding the meta-analytic method used to generate the results. The meta-analysis presented in this paper assesses a wide range of explanatory variables, including the spatial distribution of several socio-economic variables. We add contextual data to get a richer data set for identifying drivers of value, which are generally found to improve such models (Bateman et al., 2011; Kaul et al., 2013; Johnston et al., 2016) and has been applied in many studies (Brander et al., 2006, 2007; Ghermandi et al., 2010; Hussain et al., 2011; Ghermandi and Nunes, 2013). The meta-analysis in this paper focuses on tangible heritage sites, heritage goods that are situated in specific locations, but also includes intangible heritage. The following sections describe the data set and the results from the meta-analysis. We conclude by placing the results in a wider context in the discussion section.

2. Data description

In total, we collected 63 monetary valuation studies of heritage using combinations of the search terms “cultural” and “heritage” with “value”, and “valuation” in Thomson Reuters Web of Science and Google Scholar and collecting studies cited in the publications thus found. We removed duplicate studies, benefit transfer studies, and studies whose value estimates could not be standardised to total US\$ per year at 2012 price levels. Values reported per visitor or household were converted by multiplying the per person value for the relevant population using information from the study itself or government data. Values given as present value were converted to annual values using a 5% discount rate over 30 years following Whitehead and Finney (2003). Values reported in other currencies or years were converted to US\$ at 2012 price levels using purchasing parity adjusted exchange rates and GDP deflators as reported by the World Bank.

We normalised value observations using logs, and further excluded values whose log value was further than two standard deviations

away from the mean as outliers. Without excluding outliers, the results were dominated by a number of extreme values and statistical associations were found that were not present in the rest of the sample. We decided to truncate the data to values that were within two standard deviations of the mean. This provided a sample that yields results robust to removing the most extreme values. This left 87 value observations from 48 studies (see Table 1). Studies can produce multiple observations if they present distinctly different value estimations, and these observation characteristics are controlled for in the regressions (see Table 2). The maximum number of values obtained from a single study is 8, while the mean is 1.79. There were a few cases of one author producing multiple studies, but 43 different authors produced the 48 studies in the data set. Authors provided a maximum of 8 value observations with a mean of 2.00. These insights are discussed in more detail below.

Fig. 1 shows the geographic location of the 87 values used in the meta-regressions. Value observations come from 24 countries across 6 continents, but are concentrated in Europe and the United States. To address differences in studies in the regression, we constructed several categorical variables using information about the primary valuation studies. These included the asset type that was valued, the valuation method used, the benefit type that was considered, and the valuation scenario presented in the primary studies.

Asset type defines the nature of the heritage, i.e. built, archaeological, or natural. In addition, the data set includes a number of studies that value traditional knowledge. Built and archaeological sites were differentiated by whether they were constructed more or less recently than 2000 years ago. The dataset generally contains sites that are much younger than this cut-off date and, considering the variation in countries' cultures and historical paths, setting more refined distinctions was deemed to require too much interpretation of the study descriptions. Valuation method indicates which valuation technique was used in each study. Welfare measure indicates whether studies provide value estimates in total value, average value per person or marginal value per person.

For benefit type and scenario, we defined categories based on definitions from the literature. Benefit type defines which (non-) market value was investigated, i.e., tourism, bequest, existence, or aesthetic value. Scenario indicates what service or activity was valued, including conservation, preservation, access, adaptive reuse, renovation/restoration and area conservation planning. We based these scenario categories on definitions suggested by Throsby (2012): preservation (ensuring the continued existence of the asset), conservation (caring for the asset and maintaining it in proper condition according to accepted professional standards), renovation or restoration (returning an asset that has deteriorated to its original condition), adaptive reuse (ensuring continuity of use through minimal changes to the asset), and area conservation planning initiatives (ensure the value of historic buildings and sites to the economic buoyancy of whole areas).

Table 2 summarises the statistical characteristics of the dependent variable in our analysis. The mean value of the 87 value observations is \$29,700,000 per year and the median is \$2,064,292. This indicates a long right tail in the value distribution even after outliers have been removed from the sample. We therefore take logs to normalise the observations. The mean of the logged value observations is 14.50 and the median is 14.59.

The mean and median of the value observations vary across continent, benefit type, and valuation method (Fig. 2). Of the continents, Africa has the highest mean and median value (see Fig. 2a) with the two statistics approximately equal. All other continents have a mean that is noticeably higher than the median. The variation in value mean and median by benefit type and valuation method is shown in Fig. 2b and c, respectively. The two stated preference valuation methods (CE and CVM) have much higher mean and median values than the two revealed preference methods (TCM and HPM), and overall show a

Table 1
Studies included in the meta-analysis.

Author	N	Country	Low log value	High log value
Adamowicz et al. (1995)	2	United Kingdom	8.49	8.84
Alberini et al. (2003)*	1	United Kingdom	.	.
Alberini and Longo (2006)*	4	Armenia	.	.
Alberini and Longo (2009)	1	Armenia	.	6.19
Apostolakis and Jaffry (2005)*	1	Greece	.	.
Báez-Montenegro and Herrero (2012)	2	Chile	5.09	5.52
Báez-Montenegro et al. (2012)	1	Chile	.	6.73
Barrena et al. (2014)	1	Chile	.	7.61
Bedate et al. (2004)*	3	Spain	.	.
Bedate-Centeno and Prieto (2000)	2	Spain	4.97	5.39
Beltrán and Rojas (1996)*	12	Mexico	.	.
Oleson et al. (2015)	2	Madagascar	7.60	7.97
Bostedt and Lundgren (2010)	1	Sweden	.	7.81
Boxall et al. (2003)	1	Canada	.	4.94
Carson et al. (2002)	2	Morocco	7.18	7.80
Chambers et al. (1998)	1	United States	.	7.88
Choi et al. (2010)	1	Australia	.	8.27
Coulson and Leichenko (2001)	1	United States	.	5.52
Del Saz-Salazar and Garcia-Menendez (2003)	1	Spain	.	8.18
Del Saz-Salazar and Guaita-Pradas (2013)	1	Spain	.	7.43
Del Saz-Salazar and Montagud Marques (2005)	1	Spain	.	4.64
Dutta et al. (2007)	1	India	.	7.54
Garrod et al. (1996)	1	United Kingdom	.	6.29
Giannakopoulou et al. (2011)	1	Greece	.	6.20
Gražulevičiūtė-Vilenišké et al. (2011)	3	Lithuania	4.54	5.43
Grosclaude and Soguel (1994)	1	Switzerland	.	6.16
Hicks and Queen (2007)*	1	United States	.	.
Kim et al. (2007)	1	South Korea	.	6.37
Kinghorn and Willis (2008)	1	United Kingdom	.	6.90
Kling et al. (2004)	1	United States	.	5.50
Lakkhanaadisorn (2014)	2	Thailand	6.60	7.08
Lazrak et al. (2014)	1	Netherlands	.	6.26
Lazrak et al. (2014)*	1	Netherlands	.	.
Lee (2015)	1	South Korea	.	8.05
Lee and Han (2002)	2	South Korea	7.05	8.42
Leichenko et al. (2001)	7	United States	4.25	6.12
Lockwood (1996)	2	Australia	5.85	6.92
Maddison and Mourato (2001)	2	United Kingdom	7.19	7.63
Maskey et al. (2007)	1	United States	.	3.80
Mazzanti (2003)	1	Italy	.	6.60
Melstrom (2014)	3	United States	5.63	6.92
Melstrom (2015)	1	United States	.	6.51
Morey and Rossmann (2003)	2	United States	7.21	7.28
Moro et al. (2011)*	1	Ireland	.	.
Mourato et al. (2002)	1	Bulgaria	.	6.58
Nahuelhual et al. (2014)+	1	Chile	.	5.05
Navrud and Strand (2002)	5	Norway	6.26	7.68
Barnes-Mauthé et al. (2015)*	1	Madagascar	.	.
Pollicino and Maddison (2001)	1	United Kingdom	.	7.06
Poor and Smith (2004)	1	United States	.	4.99
Powe and Willis (1996)	8	United Kingdom	4.61	5.33
Provins et al. (2008)+	1	United Kingdom	.	4.67
Riganti and Nijkamp (2004)*	1	Italy	.	.
Riganti and Scarpa (1998)#	5	Italy	11.21	11.40
Rolfe and Windle (2003)	3	Australia	3.81	5.69
Ruijgrok (2006)	3	Netherlands	4.68	7.65
Santagata and Signorello (2000)	1	Italy	.	7.11
Scarpa et al. (1998)#	1	Italy	.	10.40
Seenprachawong (2006)	2	Thailand	6.79	7.27
Tuan and Navrud (2007)	4	Vietnam	5.80	6.57
Ulibarri and Ulibarri (2010)+	1	United States	.	7.12
Whitehead and Finney (2003)	1	United States	.	6.34
Willis (1994)	1	United Kingdom	.	7.57

* Values excluded due to lack of data required for aggregation.

+ Values excluded because the studies use value transfer.

Values excluded as outliers.

such smaller variation in value estimates. The median and mean of the revealed preference methods are more similar than of the stated preference methods, where the mean is higher than the median.

Table 3 shows cross tabulations of the continent variable with valuation method and asset type. Hedonic pricing and travel cost methods have only been used in Europe and North America. Fig. 2 indicates hedonic pricing and travel costs give on average lower values for heritage sites than other valuation methods used in our sample. Therefore their use North America and Europe may partially explain why sites in these two continents have a lower value on average than Asia and Africa. Table 3 also shows that the relatively high number of studies valuing built heritage is consistent across continents.

We also explore the data for authorship effects (Brouwer et al., 1999) whereby the research or personal preferences, or access to sites or funding of a relatively prolific author can produce a systematic bias in the data. Fig. 3 plots the log value by the first author of the study with first authors ordered alphabetically. The value estimates from each author have a low variance compared with the variance of the entire sample. Since authorship correlates with country and continent, this visual inspection of the data motivates our use of multilevel mixed-effects models and identifies candidates for the random effect specification.

Table 2 also summarises the continuous independent variables that we used to enrich technical information about the studies with information about the socio-economic context of the studies. We collected multiple socioeconomic indicators for the country of each heritage site in the year of valuation from the World Bank, UNESCO, and other indicators such as the road network (FAO, 1998), population density (CIESIN et al., 2011), and urbanisation (Schneider et al., 2009) in the vicinity of each heritage site. With these variables, we intended to capture drivers of value such as, respectively, the accessibility of tangible heritage sites, the number of potential beneficiaries, and the location of the sites.

Logs of all continuous variables were taken to improve distribution characteristics. Progressive model optimisation through backward selection caused many of the collected variables to be excluded from the optimised models. Only those variables that were included in the final model specification were included in table two.

3. Results

We use meta-regression to obtain marginal effects and relative importance of factors that may influence the total annual value of tangible heritage sites and intangible heritage. The dependent variable is the log of total annual value, standardised to US\$ at 2012 price levels.

Multilevel mixed-effects linear regression (MLM) is used to estimate the meta-regression model (Bateman and Jones, 2003; Brander et al., 2007; Brouwer et al., 1999). MLM can handle variation from groups within the data sample that is not taken into account using standard statistical techniques. Based on our data exploration, we included a random intercept term at the country level. Specifications with other grouping variables, such as benefit type, valuation method and continent, were experimented with but rejected for their poorer fit.

Given the dominance of tangible (built) heritage sites in the sample, we estimate a full-sample model 'model 1' for all heritage value observations and a reduced-sample 'model 2' for tangible (built) heritage only. To assess whether MLM modelling yielded significantly different results, we also compared the results from our MLM specification with generalised linear models that included the grouping variables as dummy variables. The linear models generally had issues with the error terms, and a Shapiro-Wilk test for normality of the residuals rejected the null hypothesis that residuals are normally distributed ($p < 0.01$).

Table 4 shows the regression results for models 1 and 2 with country used as the random parameter. Both models include the continuous variables (log) population density in a 10 km radius and (log) GDP per capita in the site country, as well as a dummy variable for the valuation scenario. Additionally, model 1 includes dummies for heritage type. The coefficients for the (log) continuous variables are interpreted as elasticities, and measure the percentage change in annual heritage

Table 2
Summary statistics of variables considered for meta-regressions.

Variable	Variable definition	N	Mean	Standard deviation
Site value	US\$/year; 2012 prices	87	2.968e + 07	8.89e + 07
Site value	US\$/year; 2012 prices (ln)	87	14.50	2.78
Population density	Persons per square kilometre within a 10 km radius (ln)	87	3.82	2.29
GDP per capita	GDP per capita in site country (US\$; ln)	87	9.57	1.27
Archaeological	Dummy variable for archaeological asset type	87	0.08	0.27
Built	Dummy variable for built asset type	87	0.80	0.40
Natural	Dummy variable for natural asset type	87	0.08	0.27
Traditional Knowledge	Dummy variable for traditional knowledge asset type	87	0.03	0.18
Aesthetic	Dummy variable for aesthetic value type	87	0.10	0.31
Bequest	Dummy variable for bequest value type	87	0.30	0.46
Existence	Dummy variable for existence value type	87	0.16	0.37
Option	Dummy variable for option value type	87	0.06	0.23
Sense of Place	Dummy variable for sense of place value type	87	0.07	0.25
TEV	Dummy variable for total economic value type	87	0.02	0.15
Tourism	Dummy variable for tourism value type	87	0.29	0.46
Access	Dummy variable for access scenario	87	0.06	0.23
Adaptive reuse	Dummy variable for adaptive reuse scenario	87	0.02	0.15
Area conservation planning	Dummy variable for area conservation planning scenario	87	0.02	0.15
Conservation	Dummy variable for conservation scenario	87	0.28	0.45
Preservation	Dummy variable for preservation scenario	87	0.40	0.49
Renovation / restoration	Dummy variable for renovation / restoration scenario	87	0.22	0.42
Africa	Dummy variable for site located in Africa	87	0.05	0.21
Asia	Dummy variable for site located in Asia	87	0.15	0.36
Europe	Dummy variable for site located in Europe	87	0.46	0.50
North America	Dummy variable for site located in North America	87	0.23	0.42
Oceania	Dummy variable for site located in Oceania	87	0.07	0.25
South America	Dummy variable for site located in South America	87	0.05	0.21
Choice experiment	Dummy variable for choice experiment	87	0.13	0.33
Contingent valuation	Dummy variable for contingent valuation	87	0.67	0.47
Hedonic pricing	Dummy variable for hedonic pricing	87	0.11	0.32
Travel costs	Dummy variable for travel cost	87	0.09	0.29

value for a 1% increase in the independent variable. The coefficients on the categorical dummies measure the percentage change in value when a categorical variable is true.

The log likelihood values indicate that model 2 has a better fit (log likelihood = -159.9) compared to model 1 (log likelihood = -194.4). Likelihood-ratio tests comparing the models with one-level ordinary linear regression show the random effects to be significant at the 95% level for model 1 and significant at the 90% level for model 2.

Fig. 4 and b show Q-Q plots of the residuals for models 1 and 2, respectively. This visual inspection indicates that the distribution of the residuals is normal for a large share of the observations. We applied the Shapiro-Wilkes test for normality of the residuals, which did not reject the null-hypothesis of a normal distribution for either model ($p = 0.19$ and $p = 0.33$ for models 1 and 2, respectively). In Fig. 5 and b, we show the distribution of the residuals per continent for models 1 and 2, respectively. Studies from Africa are consistently positive in both models. This is in line with insights from our data exploration. In model 2, there is only one observation from Oceania.

Both models have a large and significant intercept, which is likely to be caused by the base levels of the categorical variables 'scenario' and 'asset type'. The implications and interpretation of this result are discussed in more detail below.

In both models, the population density within a 10-km radius of a site has a positive and significant effect on value. Considering that the data set displays high variation in local population density, this is a strong signal that demand for heritage is higher in areas with higher local population densities. This result was found in other studies as well: Brander et al. (2006, 2012), for instance, find it in their meta-analyses for wetland and mangrove values.

Income per capita for the sites was retained as a regressor in the models even though income appears to have no significant effect on the valuation of heritage sites. Higher affluence was expected to be associated with stronger preferences for heritage via a mechanism of, for instance, education. The absence of a significant relationship could indicate that international heritage tourism is an important driver of economic value, but available data on tourism numbers was too



Fig. 1. Geographic distribution of the studies used for this meta-analysis.

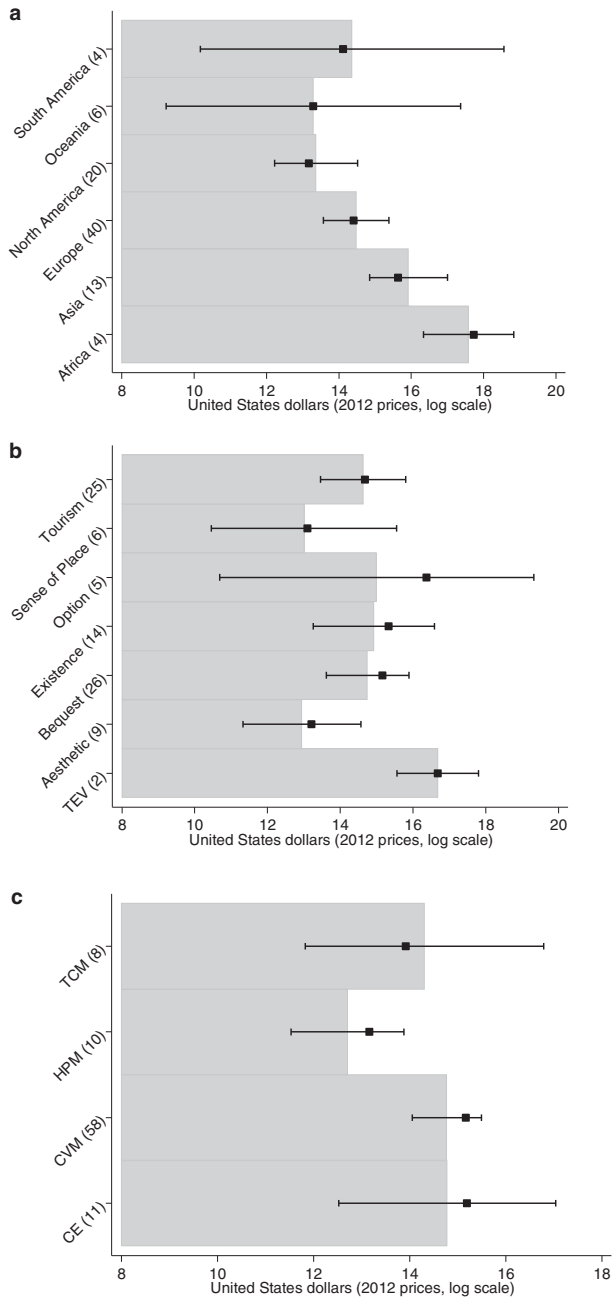


Fig. 2. Heritage site values by continent (a), benefit type (b), and valuation method (c). Values are given in log scale. The bars show the mean value, the dots the median and the error bars the standard error of the mean estimate. The number of observations in each category are given in brackets.

Table 3
Cross tabulation of the number of observations by valuation method and asset time across continents.

	Africa	Asia	Europe	North America	Oceania	South America
CE	2	2	2	1	4	0
CVM	2	11	33	6	2	4
HPM	0	0	2	8	0	0
TCM	0	0	3	5	0	0
Archaeological	0	0	3	1	3	0
Built	2	13	36	15	1	3
Natural	2	0	0	4	1	0
Traditional Knowledge	0	0	1	0	1	1

inconsistent for inclusion in the regressions. In model 1, the scenarios adaptive reuse, conservation, and renovation/restoration are all significant and positive relative to the base scenario, access. In model 2, only the adaptive reuse and conservation coefficients are positive and significant. Adaptive reuse may capture both use and non-use values simultaneously, therefore leading to higher value estimates. Neither the conservation scenario nor the renovation/restoration scenario guarantees that the current state of the site is to be maintained or improved, which may be expressed in lower valuations in the primary studies. Use values, particularly those that can be captured in markets, can be expected to lead to higher valuations. In the case of heritage buildings, moreover, these values may overlap non-use values or non-market values (for a related argument, see Horowitz and McConnell, 2002).

4. Discussion

Developments in heritage management increasingly consider economic as well as cultural values, and the number of primary valuation studies of cultural heritage sites has been growing rapidly in recent years. These studies apply to only one site, however, and are conducted in diverse contexts. Consequently, relatively little is known about common drivers of the economic value of cultural heritage. Our study identified common drivers of value by conducting a meta-analysis of primary valuation studies of tangible and intangible heritage.

The meta-analysis identified three key results. First, population density in the immediate area around heritage sites correlates with their value. Secondly, studies that consider conservation to actively maintain a heritage site (adaptive re-use and conservation) generate higher valuation estimates than those that assess only passive site protection (protection and access). In particular, adaptive reuse of sites is highly valued, possibly because the economic and cultural values are reinforced or experienced more frequently when a community can experience a site as a part of daily life. Thirdly, country grouping effects are found to be significant across studies suggesting that preferences and drivers for the conservation of heritage sites are structurally different between countries.

These results were found across a range of model specifications and thus suggest two economic arguments for targeting heritage conservation investments. First, it appears that cost-effective conservation policies would prioritise heritage sites in urban areas over sites in areas with low population densities. This approach maximises the number of people that can experience and value a site for a given budget. Secondly, if conservation is undertaken with the purpose of giving a heritage site an active role within its community, i.e. conservation for adaptive re-use, the value derived from the heritage investment will be much higher than when the site is, for instance, simply conserved.

These recommendations are very utilitarian and do not do full justice to the Cultural Capital framework, which proposes that economic, or monetisable, valuation may capture part, but not all, of their cultural values. Our results seem to support that conclusion, when we compare the full model with the model for built heritage. The former includes sites that are less easily adapted for active use. In this model restoration, which does not focus on use-related values, is a strong driver of value. Our results indicate that there are facets of heritage value that our models do not capture very well. Tourism highlights are bound to attract higher visitor numbers from the country and abroad and so generate high values, for instance. Compiling consistent tourism data may help to identify that mechanism. Elements of cultural value and intangible heritage may offer further avenues to explore what drives heritage value. The relevance of sites to local, regional or national identity is one such consideration. Another could be the approaches that national heritage organisations use to determine the cultural value of heritage sites. Retrospectively producing data about such variables, however, presents a significant challenge. Future studies could be designed as

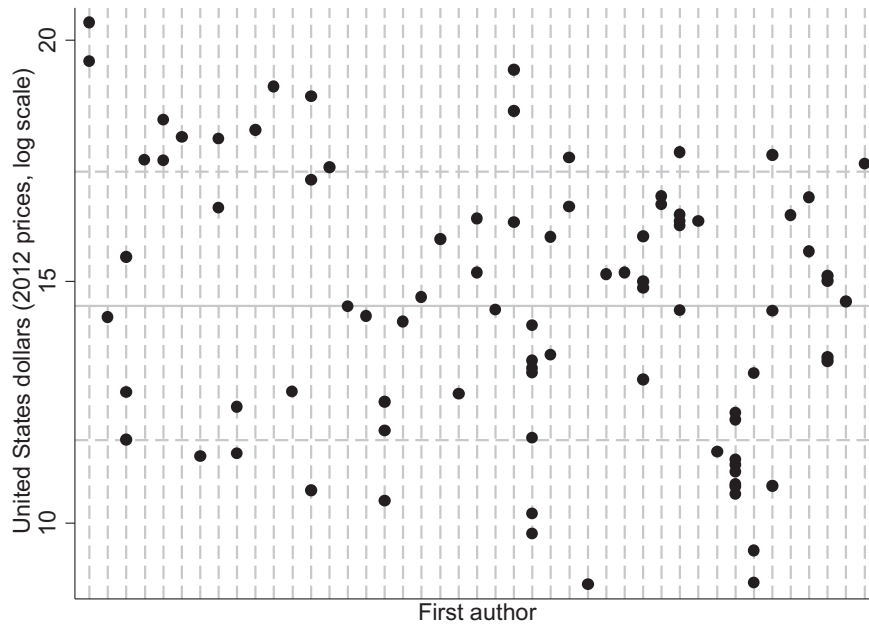


Fig. 3. Authorship effects. Each dot represents a value observation, given in 2012 United States dollars (log scale). Each vertical dashed line represents a first author and dots located on that line are observations from studies by that author. The solid horizontal line represents the mean of the value observations and the two dashed horizontal lines are located one standard deviation from the mean.

collaborations between heritage experts and economists, and integrate elements of cultural value explicitly into study design.

With these considerations in mind, the implications we draw from our results are intentionally kept general. Compared with meta-analyses of certain environmental resources, such as coral reefs, the evidence base for cultural heritage is relatively small, for instance.

Table 4
Meta-regression results.

Variables	All asset types	Built heritage only
Constant	13.98*** (2.964)	14.03*** (3.319)
Log population density in 10 km radius	0.336*** (0.128)	0.286* (0.155)
Log GDP per capita	-0.309 (0.251)	-0.277 (0.313)
Asset Type		
Built	-0.150 (1.092)	
Natural	2.002 (1.347)	
Traditional knowledge	3.419** (1.627)	
Scenario		
Adaptive reuse	7.990*** (1.928)	7.215*** (2.050)
Area conservation planning	3.512* (2.068)	2.855 (2.905)
Conservation	2.666** (1.139)	2.520** (1.219)
Preservation	1.471 (1.167)	1.505 (1.231)
Renovation/restoration	2.283* (1.187)	1.784 (1.271)
Country variance	0.764*** (0.0867)	0.817*** (0.0965)
Observations	87	70

Standard errors in parentheses.

*** $p < 0.01$.

** $p < 0.05$.

* $p < 0.1$.

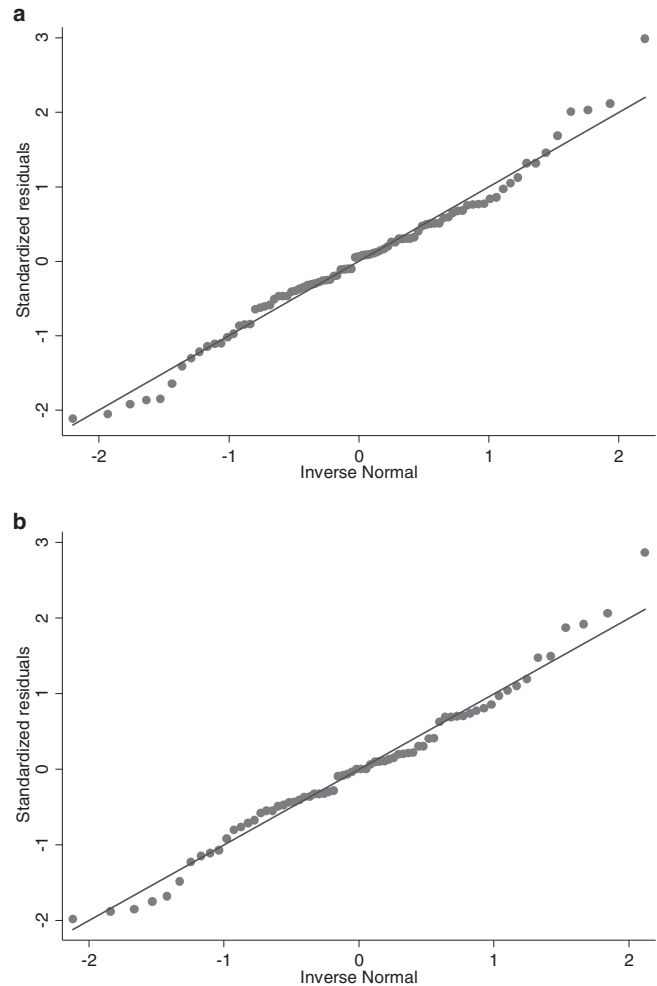


Fig. 4. a QQ plot of residuals for model 1. b QQ plot of residuals for model 2.

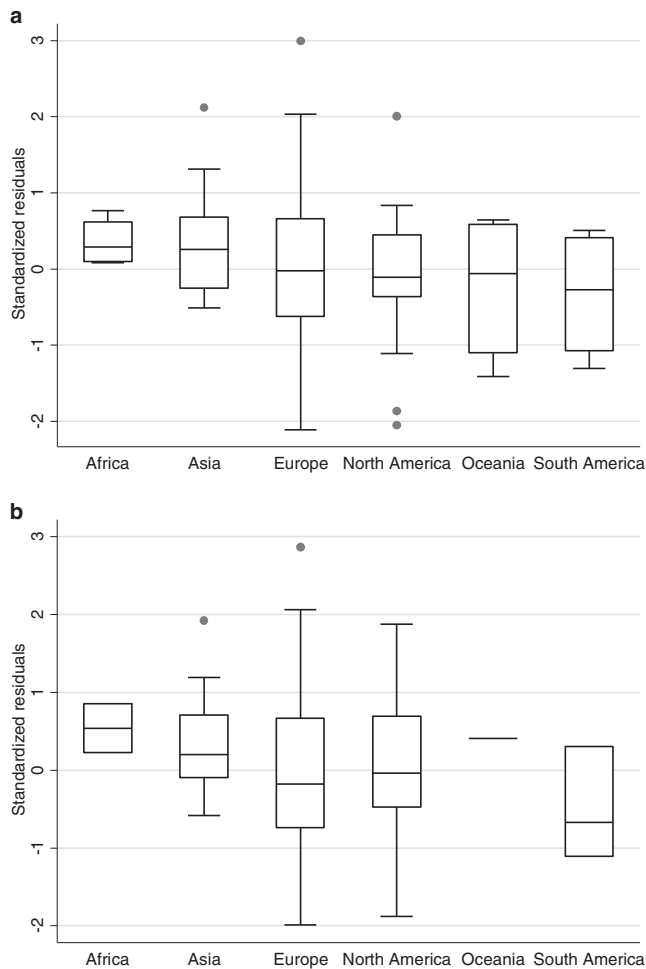


Fig. 5. a Boxplot of residuals per continent for model 1. b Boxplot of residuals per continent for model 2.

Moreover, the context-specificity of heritage values remains a concern, even though in this respect a meta-analysis of cultural heritage is not fundamentally different from one for environmental resources. The quality of the primary studies is an important factor for the insights that meta-analysis can provide, and it is possible that existing valuation studies have not aligned well with elements of cultural value. The small number of effects we report proved to be robust across a wide range of model specifications, but do not constitute a model that can be used to predict the value of heritage sites.

One of the main reasons for our care in extrapolating policy implications from our statistical analysis is that a large share of the observations in the sample relates to built heritage sites. The cultural value of archaeological sites, landscapes and traditional knowledge is studied much less frequently. Consequently, our understanding of the drivers of different types of cultural and historical heritage remains limited. In order to make headway on this front, more valuation studies of cultural heritage, ideally developed through collaborations between economists and heritage experts, are needed.

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A. Permission Application Number and Name of Applicant SUB 330

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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

C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter

Tim Ahie

Organisation

Date

01/02/2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

Support for Pure Turoa to own and run Turoa Skifield

My reasons for my objection or submission are:

Sec 9(2)(a) [redacted], I have witnessed the down fall of it 1st hand. The fact it was run in conjunction with Whakapapa was a major factor in it failing. It needs to go back to a community “feel” for the betterment of the resort and of Ohukune township. The backing and support Pure Turoa has from the local community and the very experienced (Turoa specific) staff can only mean it will be a success, which will be great for the area as a whole.

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

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

G. Attachments

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

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

How do I submit my objection or submission?

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

From: [Robbie Hollander](#)
To: [Mtruapehusubmissions](#)
Subject: Submission on Tūroa Ski Field Concession Application
Date: Friday, 9 February 2024 4:38:00 am

SUB 331

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

Make the new ownership happen please



A. Permission Application Number and Name of Applicant **SUB 332**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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

C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	Mark Phillip Holmes
Organisation	Private skier .club member.share holder
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:

Short term nature of the concession applied for.
Proposed reduction in number of users on the field, seems counter intuitive to a viable business plan.
Proposed reduction in lifts, seems counter intuitive to a viable business plan
Lack of sufficient disclosure of financials to support this concession or for interested parties to appraise the venture.

My reasons for my objection or submission are:

Privatisation of a single field on Mt Ruapehu is disadvantageous for the majority of mountain users owing to the changeable nature of the weather and conditions that prevail on Mt Ruapehu.
The costs to be able to realistically frequent the mountain should the ownership be split and privatised will likely price out the majority of current users, many of whom have to pre plan and book accommodation to participate in winter activities on the mountain.
Losing the not for profit ownership is in my opinion detrimental to all users and does a disservice to all those who have personally contributed to the existing infrastructure on both ski fields in order to retain an affordable and practical destination to ski in the North Island.
Only applying for a 10 year concession is a very concerning red flag regarding the intentions of any new private owner. Mountain infrastructure is expensive to acquire and expensive to maintain. What private owner would risk losing the return on this investment with the expiration of their concession to operate in such a short timeframe?
Only seeking to operate for 10 years to my mind signals an intention to asset strip and close the field, rather than point to any meaningful capital investment to improve the infrastructure. We have seen no other financials to support otherwise.
Iwi have expressed a preference for retaining both ski fields under one umbrella and retaining the not for profit status. I support this mindset rather than a for profit firesale of only one field, leaving the other field with an uncertain future and all users of the mountain disadvantaged when compared with the current operating model.

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 application for a ten concession. This is a ridiculously short time frame for the nature of the business under consideration.
Reject the application for the detrimental effect that it will have on Mt Ruapehu and the surrounding community, along with all of the current investors and users of the two ski fields. Privatising a single field, with no viable solution for the other, to a business who seeks to be gone with in ten years is in short, a disgraceful proposition.



G. Attachments

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

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

How do I submit my objection or submission?

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

A. Permission Application Number and Name of Applicant **SUB 333**

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 Wallis
Organisation	
Date	6/2/2024

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:

- The removal of lift facilities and reduction of capacity on Turoa skifeild
- The timeframe of just 10 years for the concession.
- The separation and privatisation of the Ruapehu assets

My reasons for my objection or submission are:

- The removal of lift facilities on the skifeild will have an adverse effect on the north island snow sports community. Although Pure Turoa have said the new lift will carry larger numbers than the 3 lower lifts they replace there has been no evidence of this or any of the plans for the new lift/gondola made public. Removal of lifts will mean that fewer skiiers can enjoy the mountain each day and as a result of the reduced capacity, at a time when more and more New Zealanders are trying to enjoy snow sport the prices will inevitably be hiked excluding the likes of family and average kiwis wanting to enjoy the Mountain. The loss of the Nga Wai Heke will also mean that access out the back of the field will be more arduous, limiting the back country terrain and enjoyment of skiiers in the process. It must also be noted that with reduced numbers able to ski on Turoa and limited snow sports groups targeted this would also lead to a reduction in numbers of visitors to the Turoa side of the mountain that flows onto spending in the local communities.
- The 10 year concession timeframe also seems to be very short given the stated plans of Pure Turoa. Given that the field is planned as a for profit business the cost to put in new lifts and make the changes that would be needed would mean a payback on these investments couldn't be achieved in this time frame. The risk that this stalls investment decisions or leads to Turoa being walked away from must be high which would be a disaster for the local and snow sports community's.
- The separation of the two skifeild assets is also a concern based on the effect outlined slightly above on the snow sports community. The North Island has no other commercial skifeilds and so formant Ruapehu has been the location they have been taught to ski or board and found their love for snow and the mountains. Having the two fields linked allowed confidence that the costs to come to the snow would be rewarded with some time up the mountain on one field or the other. Splitting the fields will force many to make a choice and maybe miss out on enjoying the mountain if one side has an adverse winter (2022 comes to mind on Turoa)

RAL may have had issues around how it has been run at times on the last 70 years but it has always been focused on allowing kiwi's to enjoy Snowsports and time in the mountains. I believe that the granting of this concession will damage that goal, limit the enjoyment of the snow sports community with reduced facilities and result in the loss of a Turoa assets if the for profit model doesn't stack up as anticipated.

Given that the Whakakpapa bid has now fallen through due to a number of the concerns raised above making the business case uneconomic it does seem that one of the options that should be considered is maybe to keep the fields as RAL with the current concisions to protect the aces to the mountain that the snowsports community has had for the last 70 years and to ensure the economic benefit to the region is still preserved.

For these reasons and given that DOC is set up to allow for the protection of New Zealands national parts and to enable all New Zealanders to enjoy them I believe that the concession should not be granted in its current state.

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.

- Details around how the removal of lifts and replacement will enhance the experience for New Zealanders.
- A longer concession with removal clauses and early termination penalties to ensure that the investments have a solid timeframe to create a payback and that the excising infrastructure is stripped for profit and then left to be cleaned up by DOC after a short period of time.
- The requirement that the two skifeilds work together to ensure that the New Zealand snowsports community have the best experience possible.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 334**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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

C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	Richard Bergquist
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:

This objection relates to

- A new licence and lease to continue operation of recreational and tourism activities on the terrain within the current Tūroa ski area boundaries.
- The removal of lift infrastructure
- The short length of concession terms
- The privatisation of publicly funded infrastructure
- The strong likelihood of commercial failure of PTL's business model across a number of factors as outlined in this submission and its risk to the DoC.

My reasons for my objection or submission are:

There are a number of reasons I object against PTL obtaining a concession. All of these are related to PTL's viability as a for-profit business on based on their future plans and the risk to continued snow recreation on Mt Ruapehu over future generations. The DoC, as part of its role to provide stewardship and protection to the national park, should be extremely wary of the high risk that the PTL plan represents to the future public enjoyment of Mt Ruapehu.

The reasons are described as follows.

1. The PTL term of concession will not fund future investment.

PTL is only requesting a 10-year concession licence. This short term will not be long enough to provide viable business cases to invest in the upkeep of infrastructure. PTL will not be able to attract investment in significant maintaining and upgrading lifts if a key legal aspect of staying in business has a fixed expiry of 10 years. This is deeply and fundamentally concerning as the only business incentive will be to strip assets, sell them and walk away.

The RAL concession of 60 years was intentionally of this length to give certainty and therefore should be the concession used. The recommendation of this submission is that a restructured RAL with a new board is the best organisation to continue to operate Tūroa ski area. RAL has successfully operated the Tūroa ski fields for over 20 years, significantly longer than any of the preceding private operators.

The continued investment in lifts is especially relevant with the current climate of global warming where it will be necessary to invest or move the operation of lifts at higher altitudes within the ski area.

2. Removal of key lifts – Nga Wai Heke chair, Giant Chair, and the Wintergarden Platter

Under RAL the lifts were funded by generations of ski area users who participated and invested into RAL as season pass holders and life pass holders. The successful operation of RAL over decades paid for these lifts. PTL as a private for-profit operator seeks to remove these lifts and reduce the overall facility, resiliency, and access to the ski area. The ski area users will find the ski area less appealing as a result of reduced access, increased traffic and removal of essential lift assets that were funded by generations of ski area users. Skiers will not prefer PTL and elect to ski elsewhere. This will be a major impediment to PTL's viability as a business.

While reduced capacity and access is one aspect another is ski area resiliency. Mt Ruapehu is a very challenging environment to operate lifts due to its exposure to NZ maritime weather while in an alpine environment. The challenges of de-icing lifts on Mt Ruapehu are world well known in the snow industry. Lifts often break down and sometimes remain so for a month or for a season. If PTL removes lifts with no redundancy it will put the whole business at risk if any single lift breaks severely in a season. This has happened multiple times in the past and will certainly happen again on Mt Ruapehu. RAL has got by in the past by its ability to operate multiple lifts to balance load and provide failover alternatives when breakdowns inevitably occur. The very lifts that PTL plans to remove. When a season ending lift

failure occurs then PTL will be out of business, the employees out of a job and the customers changing plans to ski elsewhere. This will be a major impediment to PTL's viability as a business.

The Wintergarden Platter is a key facility for the progression of learner skiers. PTL seeks to remove and reduce the facilities for learner skiers. This will reduce both the numbers of skiers who can ski the area and also reduces the ability for new skiers to progress their skills and have the desire to return to the mountain as paying customers in the future. It will act to slowly throttle returning skier numbers over time, as they become disillusioned by being unable to progress their skills at Tūroa. This will be another impediment to PTL's long term viability as a business.

3. Reduced capacity and associated access and affordability implications.

The concession proposes reducing skier capacity from 5,500 to 4,500. Reduced capacity will reduce the levels of access to the public and will also lead to increased lift pass prices as a function of supply and demand economics. All of which makes accessing the Tūroa ski area less affordable and less accessible the NZ public. This is a direct conflict of the right to the benefit, use, and the enjoyment of Mt Ruapehu for the public. Reduced access and increased prices and less visitors will erode the interest to visit the ski area and therefore impediment to PTL's viability as a business.

4. Drop in skier numbers due to disenfranchised key customers and transparency issues with the PTL and MBIE process.

Those who have being close to the RAL liquation process have observed MBIE's lack of engagement with the stakeholders, community and iwi. They share a common sense of deep disillusion in the way MBIE have conducted the process and its outcome. MBIE have devised an unwanted plan that diametrically opposes the majority wishes of the main stakeholders who are active on Mt Ruapehu, namely:

- Retaining both ski areas under one organisation.
- Retaining not-for-profit.
- Retaining community ownership/accountability.
- Honouring investments made by life pass holders.
- Long-term planning to ensure the intergenerational legacy handed down by the RAL founders and generations of snow sport enthusiasts can be handed on to the next generations.

Furthermore, PTL has also acted with lack of transparency it its late announced plans to remove lifts, its financial planning, and its redactions in its submissions including Iwi engagement and its interactions with MBIE. This has now built a situation of entrenched poor will towards PTL from most frequent and dedicated of Tūroa customers – namely the life pass holders. If PTL

- obtains a concession,
- receives all the assets for \$1
- starts to strip lift assets away
- while increasing prices to accommodate smaller numbers
- while reducing learner facilities
- while increasing the risk of lift failure impacts
- while dishonouring the \$45m investment in the area by life pass holders by cancelling their access

then it will strongly disincentivise Tūroa's largest, devoted and most frequent customer base. The life pass holder customers represent the viability of the ski area as they continue to return and bring additional new visitors though friends and family to grow and continue intergenerational visitor numbers. Under the PTL business model the numbers of life pass holders will likely not return. Options to visit Whakapapa with their pass is currently predicted to continue. PTL will see a majorly reduced number of returning visitors which Tūroa requires for its operational income. This will be a key and probably the most significant impediment to PTL's viability as a business.

5. 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. This will diminish PTL resources and impeded PTL's viability as a business.

6. Standing alone as a private entity in a very challenging public national park environment

PTL seeks to operate a standalone private commercial business in a key national park. PTL as a for-profit commercial business will be taking profits out of its operations in a public park and into the hands of its shareholders and owners.

Under RAL all profits from both Whakapapa and Tūroa were re-invested into the ski areas. Not only did this invest in the national park for the enjoyment of all, but it also kept both ski areas viable as they mutually supported each other financially as well as logistically and operationally.

Pure Tūroa Limited – in its very name – will standalone from Whakapapa. It will not receive its financial support nor its operational synergies that reduce costs. It is noted in the PwC feasibility study (see the "RAL Long Term Financial Modelling Forecast projections" included) that Tūroa would have needed to rely on funding from Whakapapa's larger profits for continued operation. In absence of these the standalone business model is not viable without loans or continued government bailouts to keep PTL afloat.

A number of times previously Tūroa ski area has been attempted to be run as a private for-profit organisation. The last time was in the 1990's. All these attempts have failed. The fixed circumstances of location in a national park, North Island weather, volcanic activity, distant access from major airports implying a North Island only customer base presents a range of immutable drivers where the private for-profit model is demonstratively proven to not work on Mt Ruapehu.

These facts are dire signs of the strong likelihood of failure of PTL's viability as a business.

The only long-term model that is proven to work was the RAL business model that reinvested into the mountain with its existing 60-year concession. RAL operated successfully for decades - until a recent freak triangulation of circumstances concerning board mismanagement, weather patterns and a global pandemic struck. However, with a restructured RAL board and a reset vision that aligns with stakeholders it remains the best organisation to continue to operate Tūroa ski area.

7. Implication to the Department of Conservation

The reasons stated above represent an overwhelming set of major obstacles to PTL's viability as a successful commercial operation within the Tongariro National Park. For all if the reasons listed above will almost certainly fail and put the Tūroa ski area back into insolvency once again.

The consequences to this failure are major to the DoC. It will leave the DoC, the NZ Government and taxpayers the responsibility pick up the pieces when PTL collapses. This may be either the removal of the ski area altogether or the repeat of the recent insolvency process. As such there should be no viable pathway for the DoC to accept the PTL application for a concession without accepting this imminent risk to the DoC's role as good stewards of Tongariro National Park and the Tūroa ski area.

It is noted from the PwC liquidation report that RAL made just under \$5M profit this year all while incurring expenses including administration and receivership fees, \$3M in capex and 2024 maintenance. It is still a viable not-for-profit, stakeholder inclusive business model to operate the Tūroa ski area.

The concession used by RAL should continue to operate the Tūroa ski area as this represents the most reliable, proven cost-effective financial model that also respects the national park and Mt Ruapehu stakeholders such as Iwi, community and its large base of intergenerational investors.

As such it is therefore the aim of this objection submission to not recommend a grant a concession to PTL.

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

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

The outcome of this submission is to

1. Not recommend a grant a concession to PTL to operate in the Tūroa ski area.
2. Reject any privatisation or sale of RAL ski area assets.
3. Recommend that the Crown should retain the existing concessions.
4. Recommend that the concession used by RAL should continue to operate the Turoa ski area as this represents the most reliable, proven cost-effective model that respects the wishes of key Mt Ruapehu stakeholders such as iwi, employees, Ruapehu community and life pass investors.
5. Recommend that the Crown to engage in good faith with iwi and the wider community to run the ski areas to best industry practice, and to allow the time and safe working relationship for Tongariro National Park claims to be settled.

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
RAL Long Term Financial Modelling Forecast projections	Jpeg Included inline below	PwC feasibility study

From <https://www.pwc.co.nz/pdfs/2023/feasibility-study.pdf>

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
RAL Enterprise Value									
Whakapapa									
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
Whakapapa EBITDA	3,624	4,651	4,917	5,380	6,004	6,785	7,760	8,979	10,482
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
Whakapapa Free Cash Flow before change in working capital & tax	180	1,270	1,809	2,203	2,447	3,003	3,698	4,566	5,636
Tūroa									
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
Tūroa EBITDA	335	309	300	287	268	245	217	181	136
Tūroa Capex allocation	-2,675	-3,000	-1,875	-1,150	-1,000	-1,000	-1,000	-1,000	-1,000
Tūroa Free Cash Flow before change in working capital & tax	-2,340	-2,691	-1,575	-863	-732	-755	-783	-819	-864

How do I submit my objection or submission?

SUB 335
SUB 335A
SUB 335B

From: [Vanessa karen Dowdell](#)
To: [Mtruapehusubmissions](#)
Subject: Save Mt Ruapehu
Date: Friday, 9 February 2024 7:56:09 am

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

Hi

For some reason we cannot edit the submission form on iPad format.

So, we would like our voices counted as a "yes" for PTL to run Throa skifield.

Reece Dowdell

Vanessa Dowdell

Kharn Dowdell

Or can you send us a proper form that we can edit and email back before 5pm today

Thanks

A. Permission Application Number and Name of Applicant **SUB 336**

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 Kelly
Organisation	
Date	9/2/24

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

My reasons for my objection or submission are:

The Ruapehu district needs Turoa to be open to help create work for local's, and seasonal workers, which helps the other business in the 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.

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



A. Permission Application Number and Name of Applicant **SUB 337**

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 Douglas Gilling
Organisation	
Date	09 February 2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

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

My reasons for my objection or submission are:

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

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

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

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

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

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

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

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

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

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

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

6. Past concessions negotiations took around four years.

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

7. Key information has not been provided.

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

Iwi engagement has been completely redacted.

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

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

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

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

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

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

G. Attachments

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

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

How do I submit my objection or submission?

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

A. Permission Application Number and Name of Applicant SUB 338

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	Abby Mitchell
Organisation	
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

- Supporting the continued use and operation of Pure Turoa on Mount Ruapehu.
- Supporting the license request for the remaining ski area boundary.

My reasons for my objection or submission are:

- The economy of the Ohakune township relies on the mountain to operate through the winter season.
- Turoa is my personal favourite ski field and is the best in the north island. There is no other premium skiing options if Turoa was not to operate and thousands of people would be devastated and forced to not ski again or go on an expensive trip to the south island or overseas.
- Pure Turoa ski area creates huge opportunity's to increase all visitors wellbeing and happiness by providing a space for all people of all ages to participate in a sport that they love and have a passion for and is the perfect space for little kids to build vital skills and memories with family.

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

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

The application to maintain and operate turoa ski area on mount ruapehu as previously undertaken by Ruapehu alpine lifts limited.

Gaining a 10 year concession for the ski area is important for future planning and provides reassurance and security for Pure turoa to continue investing in the ski area and upgrading the facilities. There needs to be clarity for the business and also for the township aswell

G. Attachments

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

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A. Permission Application Number and Name of Applicant SUB 339

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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

C.2 Your name

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

Printed name of submitter or person authorised on behalf of submitter	MARK JENSEN
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

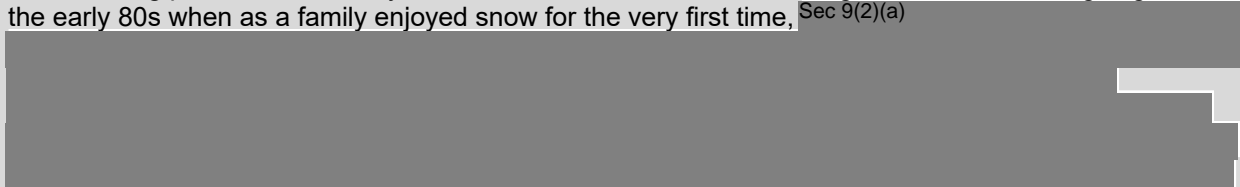
F. Objection or submission

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

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

My reasons for my submission are:

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

- I have strong personal and family connections to the mountains of Tongariro National Park going back to the early 80s when as a family enjoyed snow for the very first time, ^{Sec 9(2)(a)}

- I would never consider taking my family to the south Island for skiing as I consider Mt Ruapehu to be the best NZ has to offer for terrain, steepness snow base and community on and off the mountain, having done four seasons in the French and Italian Alps I feel I'm qualified to make this statement, but of course this is my personal opinion.
- As noted on p35 of the Tongariro National Park Management Plan (2006) Mt Ruapehu is 'nationally important' for skiing as it is the only place in the North Island where lift-serviced alpine snow sports can be provided on a commercial scale. Given the failure of Ruapehu Alpine Lifts, it is important to ensure that another entity takes over immediately. Snow sports account for about half of all visitors according to the TNPMP.
- The proposal is within the amenity area of Turoa Ski Area identified in the TNPMP and is generally consistent with the TNPMP's objectives.
- Granting the concession would **foster recreation** and therefore be consistent with section 6(e) of the Conservation Act, which states:
"to the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism."
- While there are reasons to consider delaying the granting of concessions until after Te Tiriti o Waitangi claims have been settled, I believe that the applicant's growing relationship with Ngāti Rangī and others, combined with the relatively short term sought (compared with the current RAL concession's 60 years) and the proposal to eventually remove and replace the Ngā Wai Heke, Park Lane, Wintergarden and Giant lifts with one gondola or high capacity chair with a mid-station, plus the fact that the infrastructure will be damaged by ice if not operated each winter, mean granting the concession now and then working with iwi collaboratively is the best approach going forward at this stage.

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

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

I submit that the Department of Conservation:

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

G. Attachments

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A. Permission Application Number and Name of Applicant SUB 340

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	Alan Thorn
Organisation	
Date	9/2/24

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

Lack of sufficient disclosure of important information. Making it impossible to know whether the applicants are sound or not.
Proposed reduction in lifts.
Short term of the concession applied for.
Privatisation prior to negotiation (let alone settlement) of TNP treaty claim(s)
The reduction/restriction of users of the National Park
Lack of 2023/24 ecological and environmental report on the impacts of PTL proposed operations
Impact report on water take for snowmaking and the downstream impacts in the Tongariro National Park and aquatic ecosystems below the Skifield, given the climate change scenario of predicted warmer temperatures
Removal of the make good clauses in the concession, exposing DOC and the taxpayer to a potential significant fiscal risk
The precedent that DOC would be setting for all concessioners by the extinguishing of an existing concession and the granting of a new concession, when the existing concession is still a trading entity.

My reasons for my objection or submission are:

I have always admired the fundamental wording of the National Parks Act. To preserve and protect in perpetuity. To provide for the benefit, use and enjoyment of the parks by the people.

I hold those values dear. I come at this fully aware what went wrong with RAL, I hope those deciding on this application are aware? Happy to discuss! I do not believe a rush to privatise is the answer, nor do I see it furthering the two fundamental principles above.

Events since the Administrators were called in have resulted in The Crown owning RAL. The Crown is of course the taxpayer, you and me. We now own RAL's assets. We own the concessions. Any attempt to say 'oh that's MBIE, we are DOC' simply fails to understand the fundamental fact that they are one and the same a government servant off the taxpayers.

I am aware of the feedback from the wider ski community and that feedback stated a clear preference for;

Retaining both ski areas under one umbrella

Retaining not-for-profit

Retaining community ownership/accountability

Long term planning to ensure the intergenerational legacy handed down to us by the RAL founders be handed on to our Tipuna for them to thrive in the amazing gift.

The corporate solution, as proposed goes in exactly the opposite direction.

The proposals in regards to removal of lifts I see as showing a fundamental lack of understanding of good ski area design. 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. Worse still it puts riders of different abilities on the same slopes. This is classically bad ski area design. Putting fast riders on the same slopes as slow riders ruins the experience for all and creates real and ongoing safety issues. Further, it risks crossing the boundary of what is known as Slope Capacity. This is a threshold one must NOT cross. That is more people on a slope that that slope can handle. Once that line is crossed there is no coming back. Just like a traffic jam on the motorway, everything grinds to a crawl/halt.

Turning Turoa into a two-lift-wonder is a disaster in the making. Try removing lanes off the motorway...what could possibly go wrong?

I might add that building a new lift to replace the lower lifts actually makes this situation potentially worse!

All this has the real potential to make Turoa far less enjoyable for pretty much everyone. This is a negative for Ohakune and Raetihi and the wider Central Plateaux communities.

It is also a negative for Whakapapa as the disgruntled Turoa skiers then congest Whakapapa.

RAL went bust from a combination of poor governance, poor management and a corporate mentality on the board that took it away from a successful low-debt conservative stewardship to a high-debt high-risk model.

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, ecological, environmental etc. I cannot support a proposal that leaves me no choice but to oppose. Our precious maunga deserves no less!

The proposed 10 year concession timeframe only serves to increase my concerns. Nobody, but nobody is going to make the deep capital investments required to maintain quality ski area infrastructure on a 10 year timeframe.

The precedent that DOC would potentially set by approving this concession over the existing RAL concession has both legal and moral ramifications far beyond this application and to all concessioners operation under such arrangements on the DOC (public) estate.

The lessons of Chateau might be worth noting here. I see a real risk of a for-profit entity living up to it's name and strip mining money off Turoa and leaving a husk. Further, Turoa has been run for-profit in the past. It failed. That is no reflection on the merits, or otherwise of PTL, just to point out that privatisation is no magic solution.

Possibly the most important factor though is iwi. There remains an entire Tongariro National Park Treaty claim to process. This process hasn't even begun properly yet. Deed of settlement agreements have either not even been signed yet, or the ink is barely dry. Until those are done we don't even know who will be at the negotiating table, let alone who will emerge with Mana Whenua status over what. We don't know what the legal status of the peaks, the Tuku and thus the ski areas will be. It is not my place to begin to venture an opinion on how that might be negotiated, nor of the outcome. But I do speak up to support the process.

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. 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 the concession application by Pure Turoa Ltd. in full.
Maintain the status quo of the RAL concessions in full.
Reject any privatisation / sale of RAL ski area assets. The crown (who effectively have gained control of RAL assets) to retain the existing concessions. Crown to engage in good faith with iwi, snow-sports community and the Central Plateau and wider community to run the ski areas to best industry practice to allow the time and safe working relationship for TNP claims to be settled.
Then, and only then, a proper solution can be concluded. That might indeed be privatisation.
I ask the Minister to not play fast and loose with Crown Iwi relations to the short term benefit of a few individuals and a diminished ski area. We all deserve better.

G. Attachments

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OBJECTION OR SUBMISSION

A. Permission Application Number and Name of Applicant SUB 341

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.

Peter & Devon Mackay

Sec 9(2)(a)

Cairnbrae House (Luxury accommodation)
 140 Mangawhero River Road,
 Ohakune 4691

Sec 9(2)(a)

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 submission relates to are:

We support the issuance of a Licence to Operate Turoa Ski field

We are the owner operators of CAIRNBRAE HOUSE, accommodation since 1997.

We have endeavoured to work with RDC & the RAL in providing luxury accommodation, parking and facilities for skiers, and persons using the mountain facilities for sport & recreation. We are unable to operate in situations created by global pandemics, and company collapse of the ski Industry in the Ruapehu District.

My reasons for my submission are:

Most winters we have been able to provide accommodation, and off-street parking to visitors, both National and international. In doing so we believe we have been jointly responsible for fiscally stimulating the local economy enormously.

If the approved operator of both Whakapapa and Turoa Skii fields are denied a licence to operate, then the ski accommodation providers will cease to function and will load further debt to the economy.

Therefore, we implore the Dept Of Conservation, in conjunction with IWI, approve this licence to operate the ski fields so we can survive the business obstacles that have created nothing but financial degradation the accommodation and Hospitality industry in the Ruapehu District for the past three years.

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.

Therefore, we implore the Dept Of Conservation, in conjunction with IWI, approve this licence to operate the ski fields so we can survive the business obstacles that have created nothing but financial degradation the accommodation and Hospitality industry in the Ruapehu District for the past three years.

A failure to issue a Licence to Operate the ski field for at least 10 years, will destroy our business in particular. All other similar Hospitality businesses will suffer accordingly.

G. Attachments

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How do I submit my objection or submission?

Complete this form and email to 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 342

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'.

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A. Permission Application Number and Name of Applicant SUB 343

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.1 Objector or Submitter Information-

Submitter's name (list organisational name if submitting on behalf of a business, community group, etc.)

Bruce & Kerry Neale
(olly & Leroy also).

Contact person and role of organisation

Bruce Neale

Sec 9(2)(a)

F. Objection or submission

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

The lease term.

My reasons for my objection or submission are:

I believe a longer lease needs to be considered as the amount of money to be invested needs a longer period for planning & certainty.

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 outcome that is required, is that Turoa needs to be kept open for the future of the region, without the skiing it will be a slow (maybe fast) Demise of Chakure, the people, and the future of the region

G. Attachments

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

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

How do I submit my objection or submission?

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

He tāngata, He tāngata, He tāngata!!!



A. Permission Application Number and Name of Applicant SUB 344

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 porter

Organisation

Date

9.02.24

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:

My reasons for my objection or submission are:

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

G. Attachments

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OBJECTION OR SUBMISSION



Department of
Conservation
Te Papa Atawhai

New Zealand Government

A. Permission Application Number and Name of Applicant **SUB 345**

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

Tony Renshaw

Organisation

Date

9th Feb

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

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 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
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A. Permission Application Number and Name of Applicant SUB 346

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	Stefan Baldwin
Organisation	N/A
Date	9 February 2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

The application as a whole.

My reasons for my objection or submission are:

I support the application of Pure Turoa Limited for its Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years (including associated aircraft and filming activities).

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

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

G. Attachments

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

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

How do I submit my objection or submission?

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



A. Permission Application Number and Name of Applicant SUB 347

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	Nick Reid
Organisation	
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

I want to keep shredding the gnar at Turoa please

My reasons for my objection or submission are:

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

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 348**

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:

The reduction of the number of Lifts makes no sense.
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 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.

I support the not for profit business model (under new management). It makes much better sense for visitors to the mountain and the local community.

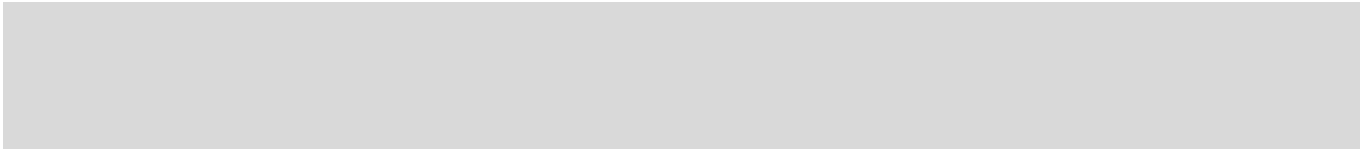
A ten year concession (if approved) is insufficient to enable a new owner to invest in infrastructure and improve the mountain. There is too much uncertainty to enable to smooth transition and a high degree of public risk. Privatisation of one skifield is detrimental to the current users, and will result 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.



G. Attachments

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A. Permission Application Number and Name of Applicant SUB 349

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	Nardia Feehan
Organisation	N/A
Date	9 February 2024

D. Statement of Support, Neutrality or Opposition

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

E. Hearing Request

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

F. Objection or submission

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

Application for:

1. Landuse
2. Aircraft Activities
3. Filming

My reasons for my objection or submission are:

I support the applications from Pure Tūroa Limited to undertake land use, filming and aircraft activities within the Tūroa Ski Area, located within the Tongariro National Park.

In my view, Pure Tūroa Limited are proposing to undertake an activity that is well thought out in terms of social, cultural and economic impacts on the local area, and wider region. I note that-

- Pure Tūroa Limited have stated that they do not intend to expand the ski area and propose to remove existing unneeded infrastructure. In my understanding, this is consistent with the desire of local tangata whenua, to reduce the footprint/ impact of the ski field on the mountain.
- While there are many important inherent values within the Tongariro National Park, guiding conservation policy (General Policy for National Parks, Tongariro National Park Management Plan and Tongariro/ Taupo Conservation Management Strategy) all provide allowances for commercial recreational activities to occur. In my view, a ski field has been established in this location since the late 1970's, becoming an important part of the local area. Given the ski-fields contribution to the local area, continued appropriate management should be enabled, provided environmental effects are adequately managed. I have read through Pure Tūroa Limited's application and consider that any potential adverse effects resulting from the operation of the ski field and being managed in a well-thought out and considered manner. Most importantly, the management proposed provides flexibility to respond to any new concerns if they may arise.
- In my reading of the objectives relating to the management of existing ski areas in the Tongariro National Park Management Plan, Pure Tūroa Limited propose to reduce the carrying capacity of infrastructure to improve the experience of users. This will also have the added benefit of reducing the physical footprint of the activities which has positive landscape and cultural effects and minimise any adverse effects.
- In my reading of the application, Pure Tūroa Limited propose to reconsider the existing infrastructure and use the site more effectively to reduce their footprint and impact with respect to cultural, ecological and landscape values.
- In my reading of the application, Pure Tūroa Limited are proposing appropriate management tools and techniques relating to (effects on) indigenous flora and fauna, and (effects of) hazardous substances, and erosion and sediment control.
- I recognise that there are significant ecological values located in the area identified as the alpine flush. In my reading of the application, Pure Tūroa Limited will avoid development within this area, and have an appropriate management regime planned to ensure potential effects on the alpine flush and Managawhero are avoided. Most importantly, it appears that Pure Tūroa Limited recognise the ecological importance of these areas and have incorporated this into their management and future planning of the ski amenities area. While I recognise that the alpine flush and Mangawhero are excluded from the ski amenities area, the management of the ski amenities area could no doubt have an effect on them if their health were not considered as part of the ski amenities area management.
- Pure Tūroa Limited appear to be keen to support the local economy and community through providing recreation and employment opportunities. In my view, the continued operation of the ski field is integral to the long-term success of the local area and townships given the ski-field's employment opportunities and the local areas reliance on ski/ snow related recreation.

Lastly, I would like to raise my concerns around the future management of the ski field area if Pure Tūroa Limited were not successful in gaining an operating concession. Specifically, my concerns would be around the immediate future and management of existing infrastructure falling into disrepair, or its full removal and following environmental restoration coming at a significant cost to the public. Additionally, the loss of the ski field would have a significant detrimental social and economic effect on the local area. In my view Pure Tūroa Limited are offering a practical solution to the current situation regarding the failure of RAL. Pure Tūroa Limited are not only proposing to take on a going concern, but have clear plans to better manage the existing infrastructure in a

culturally sensitive manner while ensuring that the local area can continue to benefit from snow tourism and recreational opportunities which have been long established on the mountain.

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

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

I do not propose any changes or amendments to the application lodged by Pure Tūroa Limited.

G. Attachments

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N/A		
N/A		

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A. Permission Application Number and Name of Applicant **SUB 350**

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:

Critical information missing from the application.
 Lack of protection of Tongariro National Park.
 Rushed process.
 Iwi bypassed in the process.

My reasons for my objection or submission are:

I am dismayed as to how much critical information has been withheld and not shared for a proposed operation in a treasured national park. The whole take over process so far, and now this application reeks of behind-the-scenes secret handshakes. It is simply corruption.

I am very concerned about the lack of protection Tongariro National Park will get if Pure Turoa gets the concession. There are red flags, like the short amount of time this concession application process seems to be taking - previous negotiations to run the ski fields took 4 years! I am concerned about the short period applied for too - without critical information provided I can only assume that they want to get the handout, and then sell it off - why else would anyone invest well into something that is only consented for 10 years?

The fact that they will be a commercial operation as opposed to the not-for-profit will mean tickets will be more expensive for the average Joe Bloggs, so less people will be able to enjoy the park. RAL's demise was last 10 years of corporate mentality and getting insteif in risky debt (after 60 successful years of community partnership of passionate skiers with crowdfunding = low risk/low debt). As for Pure Turoa, we weren't given details of their debt or investment, but they are commercial - to make money.

With what we know so far, including the removal of lifts, I do not foresee Pure Turoa even making it to the 10 year mark, even less if we have a volcanic eruption or lack of snow. Then it will really become DoC's problem, right?

Lastly, I don't understand why there's such a rush to sell it off now, while the treaty claim is in progress (or has it even started yet?).

I am vehemently opposed to any privatisation of any part of Tongariro National Park, including the ski fields. There's a way to keep it in public and community hands.

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.

SLOW DOWN the crazy rush to privatise assets that were funded by the passionate mountain community.
 Deny the application for Pure Turoa to run the Turoa ski field.
 Reject any further privatisation of Tongariro National Park.
 RAL to retain the existing concessions.
 RAL to be forced to change governance and constitution to focus on low-risk funding and operations going forward.
 Government to engage with iwi in good faith, including the treaty settlement and environmental concerns. This will take time.

G. Attachments

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