

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, A  
SUBMISSION ON THE PROPOSED TE TAI O POUTINI PLAN**

Clause 8 of Schedule 1 Resource Management Act 1991

**To:** Te Tai o Poutini Plan Team  
**Address:** 388 Main South Road, Paroa, Greymouth 7805  
**Email:** info@tppp.nz

**Further Submitter Details**

Name of further submitter: Terra Firma Mining Ltd  
 Contact person (if different from above) Lucy Smith  
 Postal address: PO Box 67, Ngaruawahia 3742  
 Email address for service: lucy@terrafirma.kiwi.nz  
 Phone number: 027 455 2120

*The TPPP team will serve all formal documents by email. Where there is no email address provided, the documents will be posted to the postal address stated above.*

**I am:** (please tick relevant box)

- a) A person representing a relevant aspect of the public interest.   
*(In this case, also specify the grounds for saying that you come within this category); or*
- b) A person who has an interest in the proposal that is greater than the interest of the general public.   
*(In this case, also explain the grounds for saying that you come within this category); or*
- c) The local authority for the relevant area.

Please state the grounds as to why you come within the category selected above:  
 As outlined in the company's submission, TFM owns a business in Reefton, and has interests in gold and coal prospecting and mining.

**TPPP Hearing** (please tick relevant box)

Do you wish to be heard in support of your further submission? Yes  No   
 If others make a similar submission would you consider presenting a joint case with them at a hearing? Yes  No

**Submission**

The submission points, support or opposition, reasons and decisions sought are set out in the attached document.

**Note:** Any attachments to your submission should only be supporting information, not the submission.

*LC Smith*

12 July 2023

Signature of the person making further submission  
 or the person authorised to sign on behalf of the  
 person making further submission.

Date

**Name of Further Submitter: Terra Firma Mining Ltd**

My specific further submissions are as follows:

| <b>I support/oppose the submission of:</b><br><i>(State the submission no., name and address of the person making the original submission)</i> | <b>The particular part of the submission I support/oppose are:</b><br><i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i> |         |                                 | <b>The reasons for my support / opposition are:</b><br><i>(State the nature of your further submission, giving reasons)</i>  | <b>I seek that the whole (or part) of the submission be allowed / disallowed:</b><br><i>(Give precise details of the decision you want the Council to make)</i> |
|--|---|---------|---------------------------------|--|---|
| Phoenix Minerals Limited   | S606.054  | Support | Open Space and Recreation Zones | It is appropriate that the use and development of minerals are acknowledged in the Open Space and Recreation Zone.           | I seek that the whole of the submission be allowed.   |
| New Zealand Coal & Carbon Limited  | S472.024  | Support | OSRZ - O1                       | It is important to make provision in the event that not all activities in these zones are complementary.                     | I seek that the whole of the submission be allowed.   |
| Bathurst Resources Limited and BT Mining Limited   | S491.035  | Support | OSRZ - O2                       | It is appropriate that the values of the Open Space Recreation Zone include mineral extraction.                              | I seek that the whole of the submission be allowed.   |
| Bathurst Resources Limited and BT Mining Limited   | S491.036  | Support | OSRZ - P14                      | OSRZ – P14 should include exploration and prospecting activities consistent with the definitions in Part 1.                  | I seek that the whole of the submission be allowed.   |
| Bathurst Resources Limited and BT Mining Limited   | S491.038  | Support | OSRZ - P14                      | Preparation of an Open Space Management Plan is independent of the RMA process and should not be referred to in this policy. | I seek that the whole of the submission be allowed.   |

| <b>I support/oppose the submission of:</b><br><i>(State the submission no., name and address of the person making the original submission)</i> | <b>The particular part of the submission I support/oppose are:</b><br><i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i> |        |                                      | <b>The reasons for my support / opposition are:</b><br><i>(State the nature of your further submission, giving reasons)</i>   | <b>I seek that the whole (or part) of the submission be allowed / disallowed:</b><br><i>(Give precise details of the decision you want the Council to make)</i> |
|--|---|--------|--------------------------------------|---|---|
| Department of Conservation   | S602.206  | Oppose | Natural Open Space Zone              | The plan has provisions for areas of areas of Outstanding Natural Landscapes, Outstanding Natural Features, Significant Natural Areas, High Coastal Natural Character and Outstanding Coastal Natural Character and it not necessary to rezone areas that contain these features to NOSZ.   | I seek that the whole of the submission be disallowed.  |
| Forest and Bird (Royal Forest and Bird Protection Society of New Zealand Inc)  | S560.0549   | Oppose | Natural Open Space Zone - Overview   | A prohibited status for new mining activity on public conservation land is overly restrictive and fails to recognise that mining activities can provide significant benefit to biodiversity through practical and financial support for pest management.  | I seek that the whole of the submission be disallowed.  |
| Forest and Bird  | S560.018  | Oppose | NOSZ - Natural Open Space Zone Rules | <p>The submitter states that coal, gold, and gravel extraction has adverse and often irreversible effects on indigenous vegetation and habitats of indigenous fauna, including in some cases total loss, and this is the basis for amending rules in NOSZ, to make all mining activities prohibited in that zone.</p> <p>The submitter seems to be unaware of current practice whereby such operations contribute to pest management and control, in partnership with DoC, with an overall benefit to biodiversity and conservation outcomes.</p> | I seek that the whole of the submission be disallowed.  |

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|--|---|---------|------------|---|---|
| New Zealand Coal & Carbon Limited  | S472.028  | Support | NOSZ - R16 | The submitter seeks to change the rule status for mineral extraction activities from Non-Complying to Discretionary. Terra Firma agrees that a consenting pathway and access to the effects management hierarchy would allow for a case by case consideration of an activity, which may only be able to locate in the NOSZ due to the limited nature of mineral deposits. Terra Firma also agrees there are other robust regulatory mechanisms in place for some land held in this zone e.g. DoC access arrangements. In addition, allowing case by case consideration for mining activities will provide opportunity to develop practical solutions to improve biodiversity alongside such operations. | I seek that the whole of the submission be allowed.   |
| Forest and Bird  | S560.358  | Oppose  | NOSZ - R16 | Amending the activity status to Prohibited for all mining activities will prevent opportunities for these activities to contribute to positive biodiversity outcomes in the NOSZ, as is currently the case.   | I seek that the whole of the submission be disallowed.  |
| Forest and Bird  | S560.361  | Oppose  | OSZ - R11  | Deleting Permitted and Restricted Discretionary Activities in OSZ for mineral prospecting and mineral exploration will prevent opportunities for these activities to contribute to positive biodiversity outcomes in this zone, as is currently the case.   | I seek that the whole of the submission be disallowed.  |

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|--|---|---------|-----------|--|---|
| Forest and Bird  | S560.0600   | Oppose  | OSZ - R19 | Requiring that all mineral prospecting and mineral exploration activities should be at least Discretionary in the OSZ is unjustifiably restrictive and will create a barrier for such activities to contribute to positive biodiversity outcomes in this zone, as is currently the case. | I seek that the whole of the submission be disallowed.  |
| Department of Conservation   | S602.069  | Support | ECO - P3  | TFM supports the proposed amendment to enable any measures to protect, enhance and restore biodiversity to be considered when applying the policy, and biosecurity programmes to manage plant and predator pests.  | I seek that the whole of the submission be allowed.   |
| Buller District Council  | S538.203  | Support | ECO - P7  | TFM supports the consistent use of language, especially references to the effects hierarchy.   | I seek that the whole of the submission be allowed.   |
| Bathurst Resources Limited and BT Mining Limited   | S491.016  | Support | ECO-P6    | TFM supports the proposed amendments to ECO-P6 to refer to the effects hierarchy and improve wording of a, b, and c.   | I seek that the whole of the submission be allowed.   |
| Birchfield Ross Mining Limited   | S604.113  | Support | ECO -P7   | The submission seeks to recognise the fixed-in-location nature of minerals extraction within areas of significant indigenous vegetation or significant habitats of indigenous fauna.   | I seek that the whole of the submission be allowed.   |

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|--|---|--------|--|---|---|
| Forest and Bird  | S560.024  | Oppose | Ecosystems and Indigenous Biodiversity Rules | Prescribing mineral extraction within any significant natural area(s) as at least a non-complying activity is overly restrictive and fails to recognise that such activities can (and do) contribute to improving biodiversity outcomes in those areas. | I seek that the whole of the submission be disallowed.  |