

Te Tai o Poutini Plan Proposed Plan Submission form

**Have
your
say!**

Te Tai o
Poutini Plan
Proposed
Plan

We need your feedback. We want to hear from you on the proposed Te Tai o Poutini Plan. What do you support and what would you like changed? And why? It is just as important to understand what you like in the Proposed Plan as what you don't. Understanding everyone's perspectives is essential for developing a balanced plan.

Your details:

First name: **Duncan**

Surname: **Hardie**

Are you submitting as an individual, or on behalf of an organisation?

Individual

Organisation

Organisation (if applicable): **Rocky Mining Limited**

Would you gain an advantage in trade competition through this submission?

Yes

No

If you **could** gain an advantage in trade competition through this submission please complete the following:

I am /am not directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Postal address: **Hardie Pacific Limited, 57 Leith Street, Dunedin Central, Dunedin 9016**

Email: **duncan@hardiepacific.com**
and **alex.booker@al.nz**

Phone: **0276562647**

Signature:



Date: **10/11/ 2022**

Your submission:

The specific provisions of the proposal that my submission relates to are:

Strategic Direction

Energy Infrastructure and Transport

Hazards and Risks

Historical and Cultural Values

Natural Environment Values

Subdivision

General District Wide Matters

Zones

Schedules

Appendices

General feedback

All submitters have the opportunity to present their feedback to Commissioners during the hearings process. Hearings are anticipated to be held in the middle of 2023. Please indicate your preferred option below:

I wish to speak to my submission

I do not wish to speak to my submission

If others make a similar submission, would you consider presenting a joint case with them at a hearing?

Yes, I would consider presenting a joint case

No, I would not consider presenting a joint case

Public information - all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information. The content provided in your submission form will be published to the Te Tai o Poutini Plan website and available to the public. It is your responsibility to ensure that your submission does not include any personal information that you do not want published.

Want to know more?

tpp.westcoast.govt.nz

0508 800 118



Te Tai o Poutini
PLAN

A combined district plan for the West Coast

Submission on notified proposal for Proposed Te Tai o Poutini Plan

- 1 This is a submission on the Proposed Te Tai o Poutini Plan (TTPP) by Rocky Mining Limited (RML).

Background

- 2 RML is an alluvial gold mining company targeting large-volume alluvial gold resources in the Rimu and Seddon Terrace areas south of Hokitika. Exploration (drilling and test pitting) is underway pursuant to the following exploration permits:

- (a) EP60567 (**Wombat Creek**);
- (b) EP60761 (**Rimu Channel**); and
- (c) EPA60880 (**Rocky Creek North**).

Maps detailing the permit areas are **attached** as **Appendix 1**.

- 3 Large scale alluvial gold mining is already underway in the Rimu, and Seddon Terrace areas, subject to mining permits adjacent to RML's exploration permits. Alluvial gold mining has been undertaken in this area since the late 1800's.
- 4 Mining in adjacent mining permits has revealed a regionally extensive zone of gold bearing gravels at depths between 10-25m below the surface. This zone is the target of RML's exploration activities. RML has completed extensive historic and modern data reviews within the permit areas and has completed significant exploration work to validate the exploration model. These exploration programmes have confirmed the potential for large alluvial gold resources to exist within the permitted areas.
- 5 The gold mining sector provides a breadth of well-paid employment opportunities for the region, which are in sync with the capabilities and proud history of extractive industries in the region. Continuation of alluvial gold mining on the Coast is important to provide diversity and consequent resilience to the job market.
- 6 RML wants to ensure that the TTPP sufficiently enables alluvial gold mining, and mineral extraction more generally (including through appropriate zones), to ensure the benefits associated with these activities can be utilised by the West Coast.

Enablement of mineral extraction

- 7 RML strongly supports the enablement of mineral extraction in the TTPP. RML is particularly supportive, and seeks to retain, the recognition of the history of mining on the Coast in the introductory sections, and the inclusion of mineral extraction strategic objectives that take precedence over other (non-strategic) objectives and require consideration in resource consent

applications. RML also support and seek to retain strategic objectives that recognise the importance of connections and resilience on the West Coast.

- 8 The TTPP also recognises the functional and operational need that mineral extraction activities have to locate where the resources is, and this is supported by RML. In particular, RML support the inclusion of the National Planning Standards definitions of 'Functional Need' and 'Operational Need', and their application throughout the TTPP – particularly the recognition in overlay chapters. RML seek the retention and further recognition of mineral extraction's functional and operational need in all overlay chapters. As detailed below, RML seek a restricted discretionary rule in the overlay chapters for mineral extraction, or at minimum activities with a functional and operational need – discretion should be restricted to the values of the particular overlay.
- 9 RML consider that it is appropriate for mana whenua to identify and define their Sites and Areas of Significance to Māori (**SASM**), and the Aotea and Pounamu Management Areas. RML consider that values associated with SASM should be expressly stated and carefully delineated so that applicants, such as RML will be in future, can ensure that their proposal are assessed for their effects on the specific values. RML support the notification to Poutini Ngāi Tahu of applications in those areas.
- 10 RML also strongly supports the introduction of the Mineral Extraction Zone (**MEZ**), and the application of the MEZ zone to the Wombat Creek and Rimu Channel exploration permits. As detailed below, RML seek that the MEZ apply across the full permit areas. RML support the provisions and rule framework of the MEZ, and the enablement of mineral extraction in the rural and open space zones. RML support noise limits and time periods identified for the MEZ (NOISE-R11) and the heavy vehicle movement trigger (TRN-6 and TRNS-14).
- 11 In addition to the parts of the TTPP detailed above that RML support and seek to retain, RML seek some amendment to the TTPP in order to further enable mineral extraction. In particular, RML seek:
 - (a) the inclusion of ancillary activities to the definitions of 'Mineral Exploration' and 'Mineral Prospecting';
 - (b) definition of all Schedule 3 values in the glossary, such as wāhi tohu, mahinga kai and nohoanga;
 - (c) recognition in the Strategic Direction chapter of the critical role that transport infrastructure plays on the West Coast with regard to connection and resilience;
 - (d) explicit recognition of hazardous substance facilities associated with mining;
 - (e) recognition of the importance of efficient and effective use and operation of the transport network;

- (f) removing any assessment of amenity effects caused by use of the transport network;
- (g) recognition within all overlay chapters that mineral extraction has a functional and operational need to locate where the resource is, and that this functional and operational need be given due consideration in resource consent applications within the specific overlay;
- (h) that directive overlay provisions seeking to "avoid, protect, prevent" or "minimise, restrict and preserve" should be limited to situations where they are warranted (i.e. for significant adverse effects, or in environments meeting significance criteria (such as SASM or Significant Natural Areas)) because they can be problematic for passing the gateway test;
- (i) removal of any presumptions that mineral extraction automatically results in an adverse effect, including that found in SASM-P11;
- (j) overlay chapters, including the SASM and Management Area overlays, contain a restricted discretionary rule for mining, with discretion restricted to effects on the specific overlay or overlay values;
- (k) deletion of the written approval trigger in SASM-R7;
- (l) a requirement to avoid the establishment of sensitive activities, and associated reverse sensitivity effects, in proximity to mineral extraction activities and known mineral resources;
- (m) that the overlays do not apply to the MEZ zoning;
- (n) application of the MEZ across permits EP60567, EP60761 and EPA60880, see **Appendix 1**;
- (o) that rural activities are provided for as a permitted activity in the MEZ;
- (p) clarification that, as standalone activities in the rural, open space and mineral extraction zones, additional earthworks rules do not apply to mineral extraction;
- (q) appropriate Lux limits are applied in the Mineral Extraction, Open Space and Rural zones;
- (r) that the noise provisions are amended so that the weekend/public holiday hours in the General Rural Zone and Open Space Zone are the same as the weekday hours, being 7:00am to 10:00pm; and
- (s) that sites and areas of significance reviewed for accuracy by mana whenua to ensure significance, and that the relevant significance values are included in Schedule 3.

Decision Sought

- 12 RML seeks any and all relief required to give effect to this submission, including but not limited to the relief detailed in paragraph [11] of this submission.
- 13 In addition, RML specifically seek any other relief as may be required to give effect to this submission, including alternative, further or consequential amendments to any provisions of the TTPP that address the matters raised by RML.

Dated this 10th day of November 2022

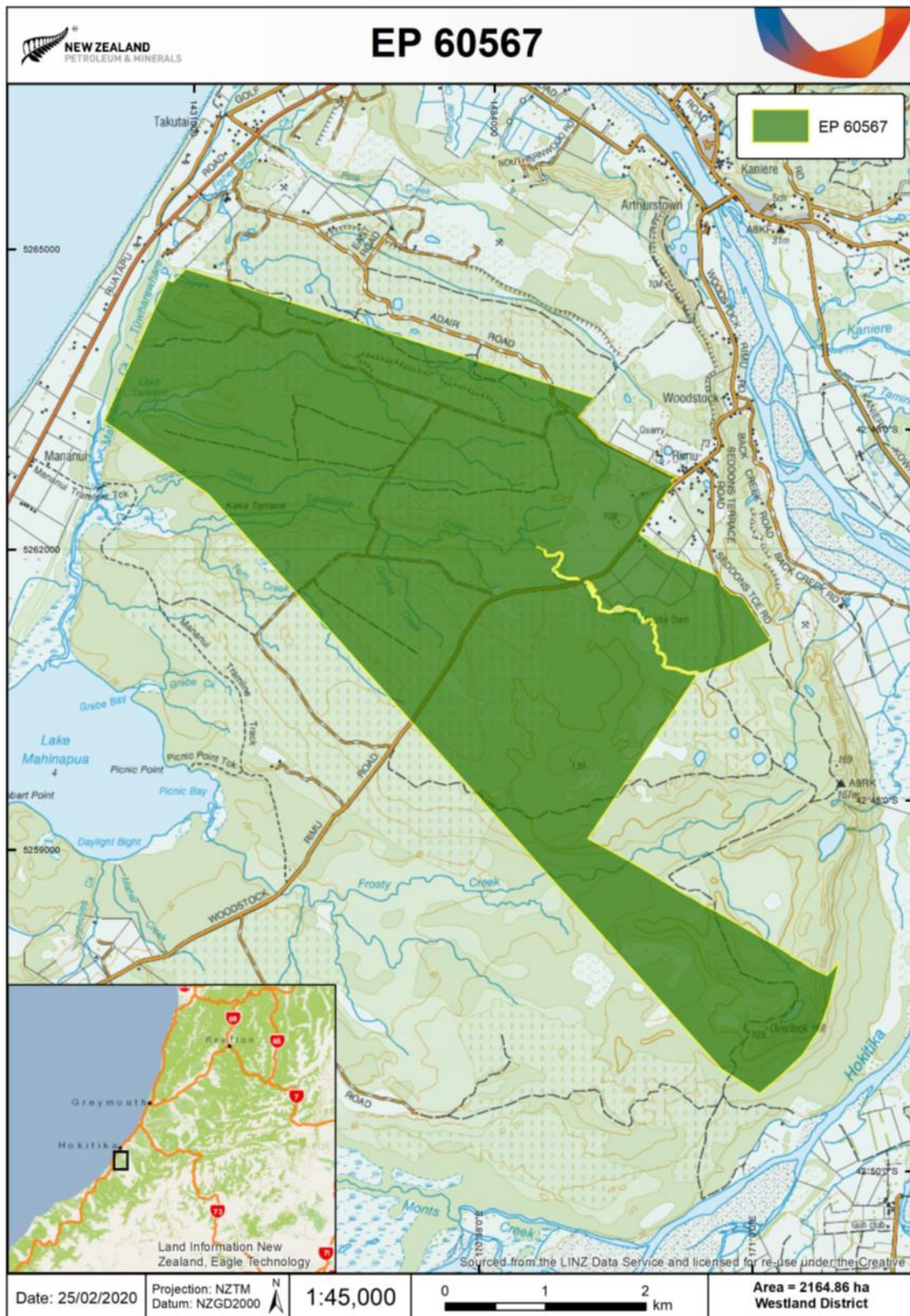


Duncan Hardie
Director, Rocky Mining Limited

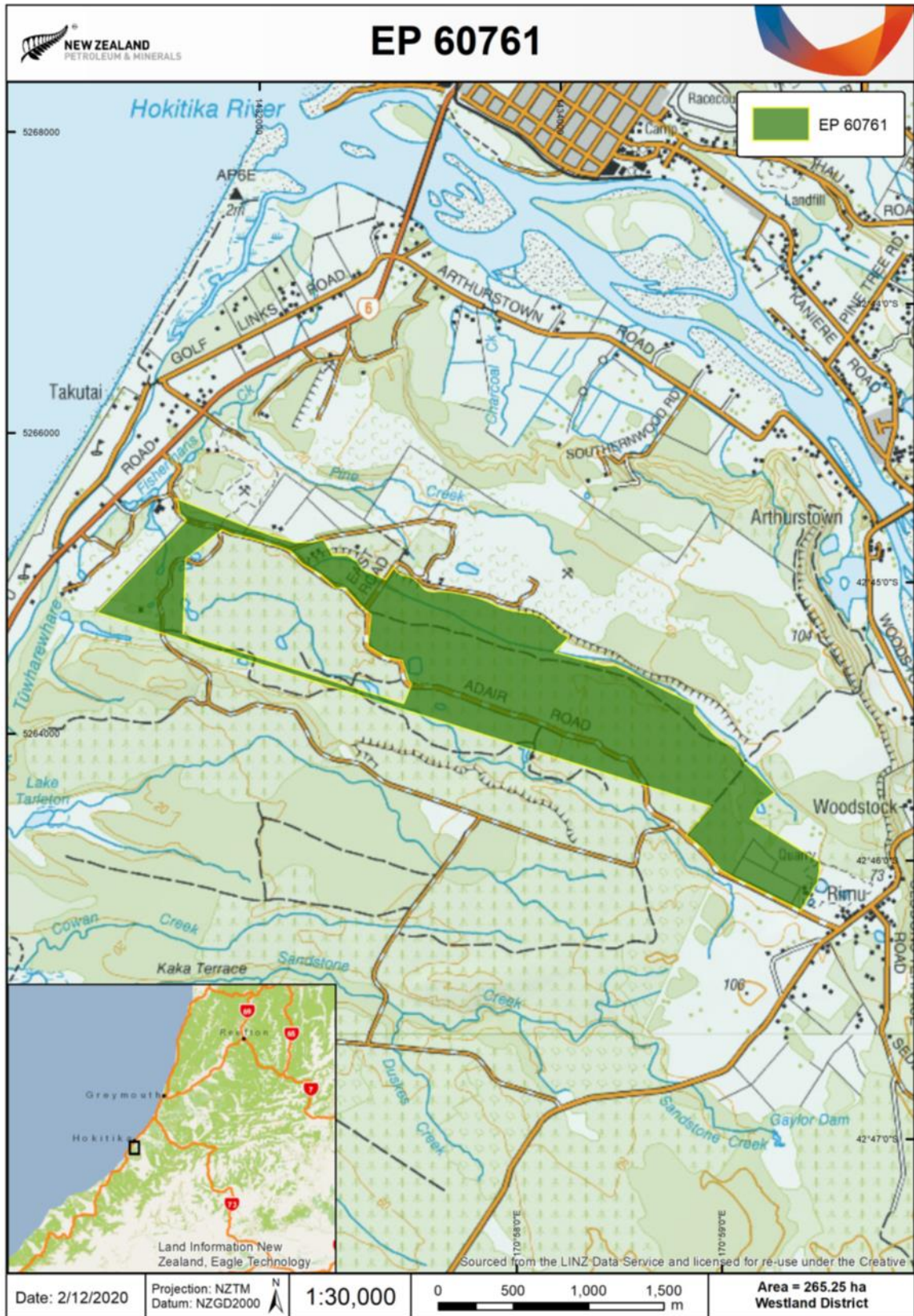
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Contact person: Duncan Hardie and Alex Booker

Appendix 1. Exploration Permit Areas

1.1 Exploration Permit 60567 (Wombat Creek):



1.2 Exploration Permit 60761 (Rimu Channel):



1.3 Exploration Permit Application 60880.01 (Rocky Creek North):

