

Te Tai o Poutini Plan Proposed Plan Submission form

Have
your
say!

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): **Papahaua Resources 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: **57 Leith Street, Dunedin Central, Dunedin 9016**

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

Phone: **0276562647**

Signature:



Date: **10 November 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?

tppp.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 Papahaua Resources Limited (**PRL**).

Background

- 2 PRL is an aggregate exploration company targeting high quality, high demand and strategically important aggerates (diorite and granite), with potential to mine granitic pegmatites hosting Lithium and Rare Earth Elements (**REE**). PRL is currently applying for an exploration permit, EPA60887 (**Application Area**), in Birchfield – to the south-west of the Buller Coalfield Zone. Map given in Appendix 1.
- 3 The Application Area is adjacent to existing Mining Permit MP60583, held by Coopers Drilling Services Limited (a related third party), and a consented quarry¹ (Appendix 1). The Application Area and surrounds have a long association and history with mining, and are surrounded by the Buller Coalfield and alluvial/hard rock gold prospects.
- 4 The Application Area was initially pegged for its gravel/hardrock aggerate potential. However, granitic pegmatites (a major source of REE and Lithium) have been found there, and we anticipate that the pegmatite dykes hosted within the granite batholith to be widespread. Detailed and systematic exploration is required to identify and sample pegmatites within the application area. Images of diorites are contained at Appendix 2.
- 5 The demand for our aggregates and minerals is huge. Diorite and granite can be used in high-value seawalls, flood protection, lower carbon concrete and other specialty applications essential to address the effects of and drivers of climate change. REEs are small scale, extremely high value, and strategically important globally. They are used in renewable energy initiatives such as wind turbines and electric vehicle batteries.
- 6 Recent announcements on the redevelopment of the Buller Port and return of coastal shipping to the West Coast, provides PRL a huge opportunity to export cost competitive high quality aggerates around New Zealand sourced from within the Application Area.
- 7 PRL aims to contribute to the West Coast's existing aggregates sector, and contribute to the burgeoning minerals sector on the West Coast. PRL can then assist the West Coast by providing a breadth and diversity of well-paid employment opportunities for the region. The skill sets required for both these sectors are in sync with the capabilities and proud history of extractive industries in the region.

¹ RC-2021-0025-01, RC-2020-0023-01, RC-2020-0023-02 RC-2020-0023-03.

General

- 8 PRL wants to ensure that the TTPP provides for this activity (including through an appropriate site specific zone) to ensure the benefits associated can be utilised by the West Coast. PRL seeks express acknowledgement in the Mineral Extraction Strategic Objectives and definitions that such aggregate quarrying activities are mineral extraction.

Support enablement of mineral extraction

- 9 PRL strongly support all provisions that enable mineral extraction across the Region. In particular, PRL supports:
- (a) recognition of the history of mining on the Coast in the introductory sections;
 - (b) the inclusion of the National Planning Standards definitions of 'Functional Need' and 'Operational Need';
 - (c) the Mineral Extraction Strategic Objectives;
 - (d) strategic objectives recognising the importance of connections and resilience;
 - (e) recognition of mineral extraction's functional and operation need to locate where the resource is, and the existing recognition of functional and operational need;
 - (f) the enablement of mineral extraction in the rural and open space zones;
 - (g) the introduction of the Mineral Extraction Zone (**MEZ**), although not directly applicable to the Application Area;
 - (h) the provisions and rule framework of the MEZ; and
 - (i) the 30 heavy vehicle movements trigger.

Seek further enablement of mineral extraction and associated activities

- 10 PRL consider that mineral extraction is the most promising future prospect for the region in terms of economic growth, development and employment. PRL intends to contribute to this sector once its exploration permit is granted for the Application Area. As such, PRL wishes to ensure that mineral extraction is sufficiently enabled for its future endeavours, and the benefit of the West Coast more broadly. PRL therefore seek any and all relief required to enable mineral extraction and associated activities (for instance ancillary activities of precursors such exploration and prospecting) to the full extent appropriate. Some of the ways PRL seek to enable mineral extraction and associated activities include:
- (a) adding ancillary activities to definitions the 'Mineral Exploration' and 'Mineral Prospecting';
 - (b) recognition in the Strategic Direction chapter of the critical role that transport infrastructure plays on the West Coast with regard to connection and resilience;
 - (c) recognition that mineral extraction can require the use and storage of hazardous substances;

- (d) recognition of the importance of efficient and effective use and operation of the transport network;
- (e) removing any assessment of amenity effects caused by the use of the transport network;
- (f) 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;
- (g) 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 Significant Natural Areas)) because they can be problematic for passing the gateway test;
- (h) that overlay chapters contain a restricted discretionary rule for mining, with discretion restricted to the specific overlay or overlay values;
- (i) a requirement to avoid the establishment of sensitive activities, and associated reverse sensitivity effects, in proximity to mineral extraction activities and known mineral resources;
- (j) clarification that, as standalone activities in the rural, open space and mineral extraction zones, additional earthworks rules do not apply to mineral extraction; and
- (k) appropriate limits for light and noise emissions.

Decision Sought

- 11 PRL seeks any and all relief required to give effect to this submission, including but not limited to the relief detailed at paragraphs [10] (a) – (k) above.
- 12 In addition, PRL 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 PRL

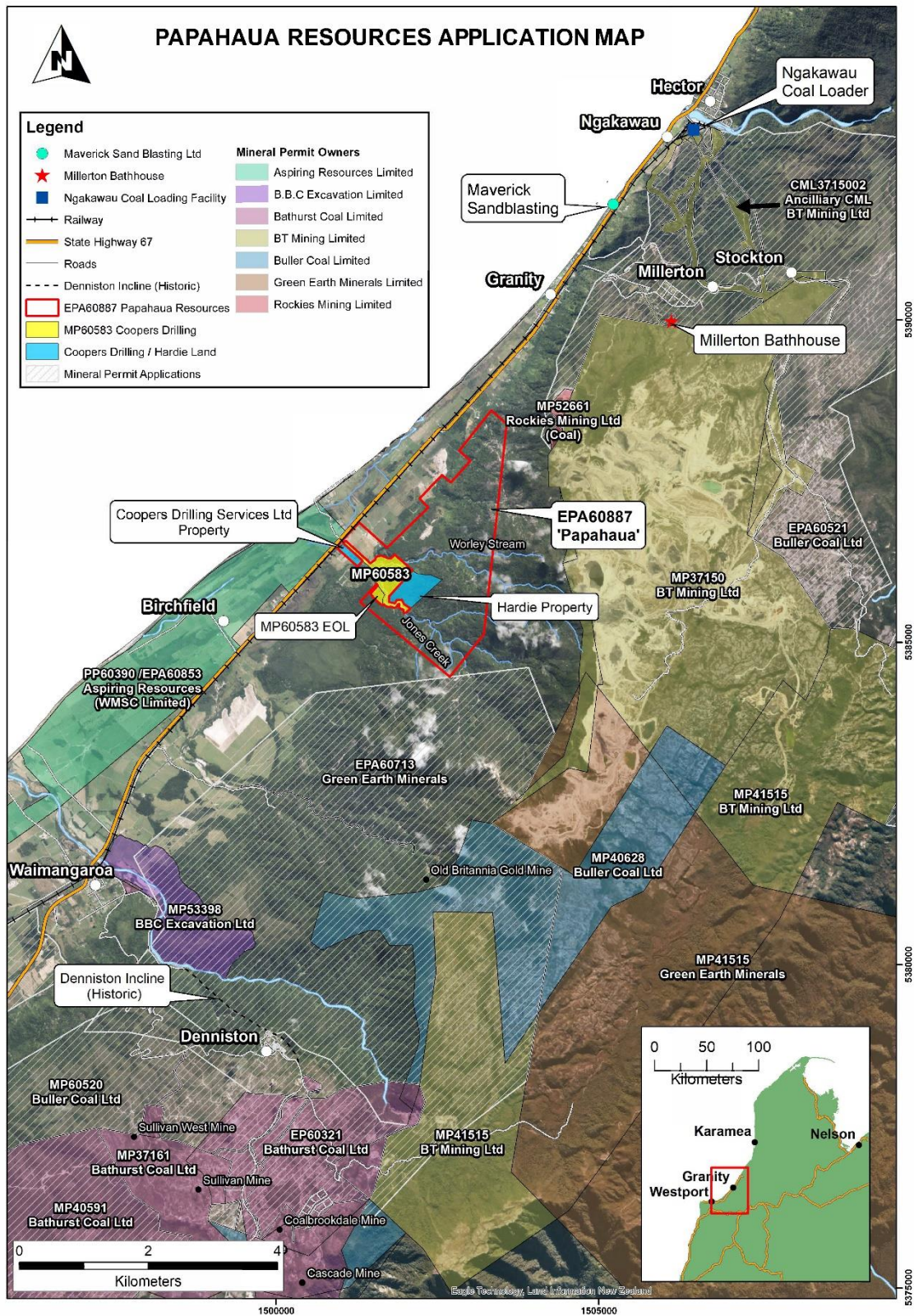
Dated this 10th day of November 2022



Duncan Hardie
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Contact person: Duncan Hardie and Alex Booker

Appendix 1. Map of Papahaua Resources Application area



Appendix 2. Images of Diorite and Existing extraction of aggerates



Diorite outcropping in Jones creek. Diorite is a very high quality aggerate with many specifity applications.



Diorite hand specium from the application area.



Granite and Diorite boulders stockpiled at the existing Jones Creek Quarry operation operated by Coopers Drilling Services adjacent to the Papahaua Resources Application area.