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Response Date	Aug 31 22
Notes	
Q1	Select the chapter you want to provide feedback on
Q2	In general, to what extent do you support the contents of this chapter?
Q3	Objective/Policy/Rule/Standard reference:
Q4	Feedback/Comments
Q5	Objective/Policy/Rule/Standard reference:
Q6	Feedback/Comments
Q7	Objective/Policy/Rule/Standard reference:
Q8	Feedback/Comments
Q9	Objective/Policy/Rule/Standard reference:
Q10	Feedback/Comments
Q11	supporting documents?
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Q12	If you need more space, or have any other general comments, please leave them here
	<p>Good afternoon Thank you for the opportunity to provide feedback on the Draft Waitaki District Plan. On behalf of Oceana Gold (New Zealand) Limited (OceanaGold) I enclose a submission on the Draft Waitaki District Plan in both pdf and word (in case you want to copy across any of the wording). OceanaGold is more than happy to discuss further with you any of the matters raised in its submission. Kind regards Pip Walker Barrister</p>



OceanaGold's Submission  
to the Waitaki District Council  
on the Draft Waitaki District Plan  
31 August 2022

Submitted by:

**OceanaGold Corporation/Oceana Gold (New Zealand) Limited**

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## **COMMENTS ON DRAFT WAITAKI DISTRICT PLAN (JUNE 2022 FOR CONSULTATION).**

### **1.1.1.1 Introduction**

This submission is made on behalf of Oceana Gold (New Zealand) Limited (**OceanaGold**). OceanaGold thanks the Waitaki District Council for the opportunity to make a submission on the Draft Waitaki District Plan (**the Draft DP**).

OceanaGold is a significant multinational gold producer and New Zealand's largest producer of gold. OceanaGold's current operating assets in New Zealand consist of two large open pit mines (at Macraes in the South Island and at Waihi in the North Island), and four underground mines (Frasers and Golden Point at Macraes, and Correnso and Martha at Waihi). OceanaGold also operated a large open pit mine at Reefton in the South Island which is now a Restoration Project and the company operates and owns a mine at Didipio in the Northern Philippines, and at Haile in South Carolina, United States of America.

The Macraes Gold Operation is located approximately 30 kilometers (km) to the northwest of Palmerston in the Waitaki District. The Macraes mining and exploration tenements cover a contiguous area of 15,705 hectares. The mining operation is centered 1 to 2 km to the east of the Macraes township and is predominantly surrounded by farmland.

Presently, the company directly employs around 600 people at the Macraes site. The mine also provides significant additional job opportunities for contractors, with several contractors permanently based at the site and a large contractor workforce utilised during regular processing plant maintenance shutdown events. Mining contributes 31% of Gross Domestic Product in the Waitaki District.

The Macraes operation is the largest goldmine in New Zealand and since the commencement of operations over 5 million ounces of gold have been produced.

The Macraes operation was commissioned in 1990 following the construction of a gold processing plant to treat ore mined by open pit mining methods and has been operating continuously since that time, for over 30 years now. Infrastructure worth \$100 millions continues to support a current Life-of-Mine out to approximately 2028, with ongoing exploration drilling in areas of known propsectivity targeted at extending that life beyond 2030 and towards 2040.

The current Waitaki District Plan was made fully operative in May 2010 and Part III Section 6 applies the Macraes Mining Project Mineral Zone to the area of land that was controlled by the company and included in the company's Mining Permit 41064 at that time. Subsequently the company's land ownership and the area of the Mining Permit has expanded in line with ongoing investment and the Zone no longer incorporates the full extent of the Macraes operation or its development potential. The review of the Waitaki District Plan provides an

opportunity to update this to reflect OceanaGold's current, proposed and potential operations for the duration of the district plan.

#### 1.1.1.2 General comment

OceanaGold has prepared detailed submissions on individual chapters of the Draft DP and in some instances OceanaGold has suggested specific amendments. Suggested deletions are shown in ~~strike through~~ and suggested insertions are shown in underlined text.

As a general overview OceanaGold:

- Supports the enabling provisions and recognition accorded to mining through the Special Purpose Zone: Macraes Mining (**SPZMM**);
- Supports the two tier approach in the SPZMM with an “Existing Mining Overlay” and a “Potential Mining Overlay” ;
- Requests clarification on the relationship between the rules in the SPZMM and other chapters in the Draft DP which deal with overlapping activities;
- Appreciates that the Waitaki District Council is preparing its District Plan at a time of ongoing legislative, policy and planning evolution and is mindful that the Waitaki District Council will need to respond to these changes in an appropriate manner so that the Proposed District Plan gives effect to these documents;
  - The Otago Regional Council is required to notify an Otago freshwater planning document by 30 September, which will inevitably lead to amendments being made to the Proposed Otago Regional Policy Statement 2021. It is unclear if this will result in the content of the PORPS changing, but the Proposed District Plan will need to be give effect to the PORPS.
  - OceanaGold anticipates that the National Policy Statement on Indigenous Biodiversity (**NPSIB**) will be gazetted soon.
  - Similarly proposed changes to the National Policy Statement on Freshwater Management and associated regulations (Freshwater Package) are expected to be in force by the end of this year.

#### 1.1.1.3 Part 1 – Introduction and General Provision

The description of the district acknowledges that the traditional rural and farming district has diversified to included mining. OceanaGold submits that this description should be amended to better acknowledge the long history and importance of mining to the district, as well as the significant contribution mining makes to the Waitaki District economy. A 2021 study showed that mining accounted for 31% of Waitaki District GDP (Infometrics).

The list of other planning documents considered<sup>1</sup> does not refer to Kai Tahu ki Otago 2005 Natural Resource Management Plan 2005 or the Freshwater Package (which also applies to local authorities), and it will need to refer to the NPSIB and accommodate changes to the Freshwater Package when these come into effect.

OceanaGold suggests amending “Reserves Act ~~1997~~1977” and “Health and Safety at Work Act 2015 in ~~Employment Act 1992~~”.

### **District Plan framework**

It is unclear how mining could be managed under the earthworks and ECO provisions without undermining the specific provisions of the SPZMM chapter. Mining, by definition can be seen as including earthworks and for that reason mining in the SPZMM might also be viewed as being subject to the general earthworks rules. The SPZMM rules are well considered and specifically apply to mining, while elsewhere the plan is explicit that the earthworks rules are not intended to apply to mining - the draft plan has split the earthworks chapter into mining activities addressed in Part C and quarrying for aggregate activities in Part B while general earthworks rules are set out in Part A. The same clarification is not included in the Macraes special purpose zone. The wording could be made explicit to avoid confusion.

OceanaGold suggest a minor clarification to ‘non-complying activity’ explanation in activity status Table 1:

“WDC may or may not grant consent or impose conditions for a non-complying activity and may consider any relevant matter. Applicants must demonstrate that effects of their proposal are no more than minor or that the proposal is not contrary to the objectives and policies of the District Plan and any relevant proposed plan before WDC can ~~makeing~~ a decision whether or not to grant consent.”

OceanaGold suggest alternative wording in the following statement:

“The WDC may impose conditions on consent in accordance with Section 108 and 220 of the Resource Management Act, in ~~restricting or prohibiting~~ managing certain aspects of the proposal to ensure it complies with the Resource Management Act and the District Plan.”

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<sup>1</sup> Draft WDP at page 4.

Relationship between spatial layers<sup>2</sup> does not list the Macraes Mining Zones overlays, nor is the Macraes Mining Zone listed as a zone.

### Definitions

To address OceanaGold’s concerns about the potential for inconsistency between the earthwork provisions in other parts of the Draft WDP and the SPZMM rules, one option would be to amend the definition of earthworks to exclude mining activities as follows:

means the alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts and excludes mining activities undertaken in the Special Zone – Macraes Mining.

The definition of mining refers to the primary purpose being for “extraction, winning, quarrying, excavation...” but then the latter part of the definition excludes quarrying activities, most likely because there is a separate definition for quarrying activities (from the National Planning Standards). OceanaGold suggest removing the first reference to quarrying to avoid confusion.

OceanaGold also suggest amending the definition of mining to reflect the broadly worded definition of quarrying activities;

“means the use of land and buildings and associated infrastructure for the primary purpose of the extraction, winning, ~~quarrying~~, excavation, taking and associated processing of minerals and any ancillary activity related to mining including the deposition of overburden material in waste rock stacks, rehabilitation, landscaping and cleanfilling and the use of land and accessory buildings associate with the operation of the mine, but does not include prospecting and exploration and quarrying activities.”

#### 1.1.1.4 Strategic Direction

**SD-RA-01** recognises the contribution of primary production and rural industry. OceanaGold supports this.

#### 1.1.1.5 Transport

TRANS-S1 says that a site must have pedestrian and cycling access provided to the site from a legal road. Due to operational issues, it would be unsafe to provide pedestrian and cycling

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<sup>2</sup> Draft WDP at page 17.

access to the working mine area. There needs to be recognition that for some activities such as mining, pedestrian and cycling access will not be provided. Similar amendment needs to be made in TRAN-S12 which requires the provision of on-site cycle parking.

#### 1.1.1.6 Hazardous Substances

HAZS-P5 says to manage use and development which uses, stores or disposes of hazardous substances from locating with or adjoining certain areas “unless it can be demonstrated that the residual risk to the identified values and qualities of these areas will be avoided, or where avoidance is not practicable, remedied or mitigated”. This includes defined Heritage Items, defined Significant Natural Areas, above 900 m in altitude. Macraes Mine stores and uses hazardous substances associated with blasting and gold recovery operations. These are subject to stringent requirements under the HSNO legislation. OceanaGold supports the policy providing for an effects management hierarchy of avoidance, or where avoidance is not practicable, remediation or mitigation.

#### 1.1.1.7 Natural Hazards

Some of the activities at Macraes Mine introduce natural hazards, for example tailings storage facilities (**TSF**) are classified as dams. There is a requirement to obtain a building consent for TSF and waste rocks stacks (**WRS**) and these facilities are subject to rigorous assessment and on-going monitoring to manage potential effects. These facilities are also vital components of the mining operations and OceanaGold suggests an amendment to NH-P3 and NH-P6 to acknowledge that sometimes the development being carried out itself carries inherent risks which are appropriately managed.

“NH3-P3 Risk based approach

Avoid subdivision, use and development in areas where natural hazards may occur, unless it can be demonstrated that the risk from natural hazards to people, property, and the environment can be mitigated to an acceptable level, taking into consideration the:

1. likelihood of the natural hazard event; and
2. type and characteristics of the natural hazard; and
3. potential consequence of the natural hazard event, including cumulative effects; and
4. the nature of the subdivision, use and development itself including any locational constraints or functional need to locate in areas where natural hazards may occur; and
5. effects of climate change.”

“NH-P6 Site specific assessment/investigation

A risk assessment will be required for subdivision, use and development in areas subject to risk from natural hazards that takes into account all of the following:

1. the type, frequency and scale of the natural hazard and whether the effects will likely be temporary or permanent; and
2. the type of activity being undertaken and its vulnerability to natural hazard events; and
3. the consequence of a natural hazard event in relation to the proposed activity; and
4. the suitability of any proposed new allotment and intended future use; and
5. the potential effects, including positive effects on public health and safety and other property; and
6. the potential effects, including positive effects on social, cultural and economic wellbeing; and
7. any exacerbation of an existing natural hazard risk; and
8. any risk reduction or hazard mitigation measures proposed, including relocation and recovery; and
9. the nature of the subdivision, use and development itself including any locational constraints or functional need to locate in areas where natural hazards may occur; and
10. any opportunities to take an adaptive management approach to addressing the risk.”

#### **1.1.1.8 Historic Heritage**

The introduction should acknowledge the contribution of Chinese miners and OceanaGold suggests the following amendment:

“The Waitaki District has a wealth of historic heritage from several waves of settlement by Māori, and Europeans and Chinese.”

HH-O1 Protection of heritage should be amended to acknowledge that there may be effects on historic heritage, but that in these circumstances appropriate remediation or mitigation can be provided by documenting historic heritage, appropriate re-use or the use of interpretive signs. The following amendment is suggested:

“The District’s historic heritage is recognised, maintained and protected, or appropriate remedying or mitigation is provided in order that the heritage of the District be retained.”



OceanaGold supports policy HH-P5 “modern service attachments” which assists in the adaptive re-use of historic heritage buildings.

OceanaGold suggests amendments to HH-P9 “Relocation of Historic Heritage Items within or beyond their setting” and HH-P10 “Demolition or destruction of Category B Historic Heritage Items” to recognise that there may be development, which because of functional need or locational constraints, need to occur in places where there is historic heritage.

“HH-P9 - Demolition or destruction of Category B Historic Heritage Items

Allow the relocation of Historic Heritage Items within or beyond their heritage setting where it can be demonstrated that:

1. relocation is necessary due to risk to the Historic Heritage Item from natural hazards; or
2. relocation is necessary due to any locational constraints or the functional need of an activity to occur where the Historic Heritage is located; or
3. the physical condition of the Historic Heritage Item and its values will be enhanced; or
4. adequate measures are in place to minimise risk of damage to the Historic Heritage Item; and
5. the new location of the Historic Heritage Item is as close to the original location as practicable.”

“HH-P10 – Demolition or destruction of Category B Historic Heritage Items

Only allow the demolition or destruction of Category B Historic Heritage Items where it is demonstrated that:

1. the extent of the work required to retain and/or repair the Item is of such a scale that the values and integrity of the Item would be significantly compromised; or
2. there is a significant risk to public safety or property which cannot be removed or reduced through interim protection measures; or
3. there is no reasonable alternative to demolition, including, but not limited to, the consideration of the following options:
  - a) remedying the risk; and/or
  - b) repair; and/or
  - c) adaptive re-use; and/or

d) relocation; and/or

e) stabilising the building for future repair;and/or

f) partial demolition with minimal effect on the heritage values for which the Item was scheduled; and/or

g) façade retention; or

4. the cost of remedying any disrepair or threat to life and/or property is prohibitive; or

5. there is any locational constraint or the functional need of an activity to occur where the Historic Heritage Item is located.”

“HH-R2 – Animal grazing for vegetation maintenance on sites and their setting identified in SCHED2 – Historic Heritage Items” should be amended so that only sheep or goats can graze as a permitted activity. Cattle have the potential to cause damage to Historic Heritage Items as well as ground pugging.

OceanaGold supports the HNZPT Accidental Discovery Protocol in APP2.

#### **1.1.1.9 Ecosystems and Indigenous Biodiversity**

Whilst OceanaGold accepts that subdivision, use and development can give rise to “adverse effects that degrade biodiversity values”<sup>3</sup> the introduction should be amended to recognise that predators such as rodents and possums pose a significant threat to New Zealand’s biodiversity. Furthermore, predator control, covenanting and other measures offered as biodiversity offsetting or compensation can have measurable benefits for biodiversity.

OceanaGold is generally supportive of the ECO objectives and policies. Although they do not specifically provide a consenting pathway for mining as is proposed in the Exposure Draft of the NPS-IB, the effects hierarchy is open to any subdivision, use or development. When the NPS-IB comes into effect, the Council will need to ensure it is given effect to.

OceanaGold suggests amending ECO-O2 and ECO-P2 to refer to maintenance of biodiversity values.

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<sup>3</sup> Draft WDP, Ecosystems and Indigenous Biodiversity Introduction at page 284.

ECO-O2 “Identify and protect or maintain Significant Natural Areas”

“Areas identified as Significant Natural Areas are protected or maintained to ensure no net loss of indigenous biodiversity or indigenous biodiversity values as a result of land use activities.”

ECO-P2 “Protection or maintenance of Significant Natural Areas”

“Protect or maintain Significant Natural Areas listed in SCHED6 – Significant Natural Areas and identified through the resource consent process by...”

ECO-P3 Appropriate activities within Significant Natural Areas

1. enable limited earthworks within a Significant Natural Area listed in SCHED6 – Significant Natural Areas where it is of a scale and nature that maintains biodiversity values or where it is provided for under the National Policy Statement on Indigenous Biodiversity;
2. enable limited clearance of indigenous vegetation within a Significant Natural Area where it is:
  - a) of a scale and nature that maintains biodiversity values; or
  - b) undertaken for mahika kai purposes in accordance with tikaka Māori by mana whenua.

OceanaGold support ECO-P6 which supports the maintenance, restoration and enhancement of indigenous biodiversity.

ECO-P7 recognises national priorities for protection as:

1. indigenous vegetation in land environments where less than 20% of the original indigenous vegetation cover remains;
2. areas of indigenous vegetation associated with sand dunes and wetlands;
3. areas of indigenous vegetation located in “originally rare” terrestrial ecosystem types not covered under 1. and 2. above; and
4. habitats of threatened and at risk indigenous species.

Because this is a draft Plan there is no section 32 report which sets out the justification of these areas as being national priorities for protection. OceanaGold would like to better understand the rationale for these areas, and the implications (i.e. will the Council be seeking to covenant these areas?).

In terms of the rules, it is unclear to OceanaGold how mining activities with a functional need to occur within SNA, will be treated under the ECO rules.

ECO-R3 says that earthworks within a SNA listed in SCHED6 is only a permitted activity where it is for the repair and maintenance of existing and lawfully established roads, farm tracks, yard, irrigation infrastructure, fences, dams, walking tracks, cycling tracks or driveways and access. Otherwise it is a non-complying activity. This rule does not reflect clause 3.11(2)(a)(ii) of the exposure draft of the NPS-IB which provides an exception for mineral extraction in a SNA, nor does it reflect the SPZMM rules which provide that mining within the Existing Mining Overlay is a controlled activity with matters of control including measures to maintain indigenous biodiversity, and that mining within the Potential Mining Overlay is a restricted discretionary activity. Whilst it is accepted that the NPS-IB is not yet in effect, it does signal the latest policy on providing a consenting pathway for mining. OceanaGold considers it would be appropriate for ECO-R3 to be amended to provide that mining is a controlled or restricted discretionary activity to provide consistency with the Special Purpose Zone, or that ECO-R3 is amended to exclude mining which is covered by the SPZMM. The SPZMM rules require the Council to consider measures to maintain indigenous biodiversity, and therefore protection of biodiversity is already assessed and considered as part of the decision making process. Given the broad range of matters denoting a SNA, the current drafting would mean that in many instances the controlled or restricted discretionary status under the SPZMM rules would be “trumped” by the ECO rules and become a non-complying activity. Without more enabling provisions within the District Plan that recognise and promote mining activity this could make it difficult for a non-complying activity to pass through the gateway test in section 104D of the RMA before it is able to be considered for consent.

This amendment would also be consistent with the approach taken for infrastructure which is covered by the Infrastructure District -wide chapter, but does not seem to be covered by the Ecosystems and Indigenous Biodiversity chapter<sup>4</sup>.

ECO-R4 makes mining activities adjacent to a SNA listed in SCHED6 a non-complying activity. OceanaGold does not support this. Adjacent is not defined in the Draft WDP, and it unclear how adjacent will be interpreted i.e. whether it relates to what land parcel the activity is located on, or whether there is a minimum distance requirement. Rules in a district plan need to be certain for the benefit of both those reading the plan and those administering it. There is no discussion of whether the activity has any effect on the adjacent SNA, so the premise behind making this a non-complying activity is not clear. OceanaGold therefore seeks that ECO-R4 in its current form be deleted.

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<sup>4</sup> Other than roads, farm tracks, yards, irrigation infrastructure, fences, dams, walking tracks, cycling tracks or driveways and access.

ECO-R5 makes mining within a SNA listed in SCHED6 a non-complying activity. OceanaGold does not support this and this activity status does not accord with the direction taken in the exposure draft of the NPS-IB, nor the SPZMM rules. There is no recognition of the functional need of mining to locate where minerals are found, which can often coincide with areas of high biodiversity which may be a SNA. OceanaGold seeks that this rule be amended so that it does not apply to mining covered by the SPZMM.

“ECO-R4 - Exotic plantation forestry, agricultural intensification, quarrying or mining (except for mining in the Special Purpose Zone – Macraes Mining) activities adjacent to a Significant Natural Area listed in SCHED6 – Significant Natural Areas”

All zones (except for the Special Purpose Zone – Macraes Mining)...”

#### **1.1.1.10 APP3 – Criteria for evaluating the significance of indigenous vegetation and habitats of indigenous fauna**

The criteria set out in APP3 are very broad and mean that large areas of Macraes would be SNA.

OceanaGold appreciates that the criteria in APP3 come from the Proposed Otago RPS which was notified in 2021, and OceanaGold has made similar comments in relation to the Proposed RPS.

These include concerns that the significance criteria are more stringent and restrictive than those in the exposure draft of the NPSIB; and that a site only has to meet one of the criteria in order to be significant.

#### **1.1.1.11 Natural Character**

OceanaGold supports NATC-P2 “significant adverse effects on riparian margins” as this policy recognises that there may be functional or operational needs for structures to have significant adverse effects on riparian margins.

The planning maps show an area on the Taieri Ridge of Outstanding Natural Landscape which is close to the existing consented Coronation Pit. OceanaGold does not consider this to be an ONL and is unclear as to the Council’s evidence supporting this as an ONL. OceanaGold would welcome an opportunity to review the evidence.

Mining within or on a Significant Natural Feature or Rural Scenic Landscape or Outstanding Natural Feature or Landscape is a non-complying activity (NFL-R11 and NFL-R12). OceanaGold is neutral on these rules.

#### 1.1.1.12 Earthworks

OceanaGold considers there is a lot of duplication within the Draft DP because in addition to the earthworks chapter, there are specific earthworks rules in other chapters such as ECO, as well as the rules in the SPZMM. As outlined above, OceanaGold is unclear as to how mining will be dealt with under the earthworks chapter without undermining the SPZMM chapter.

OceanaGold is generally supportive of the objective and policies which enable earthworks where the scale, extent and effects are commensurate to the level of development anticipated in the zone or overlay area (EW-P1) whilst avoiding, remedying or mitigating adverse environmental effects (EW-O1).

EW-P4 “primary production activities” says “Enable earthworks that support the operational efficiency of primary production activities, including the maintenance and repair of existing tracks, yards, irrigation infrastructure, fences and dams.” This policy focuses on the agricultural aspects of primary production activities and ignores that mining is part of primary production. OceanaGold suggests amending this policy by inserting a reference to mining “and mining activities”.

The General Interpretation of rules says “The activity status, rules and standards in this chapter apply to earthworks activities undertaken in all zones and overlay areas, with the exception of the following:

- Earthworks within the ‘Existing Mining Overlay’ area within the Special Purpose Zone – Macraes Mining”

OceanaGold submits that this exception should also extend to the Potential Mining Overlay as well to avoid a disconnect.

Part C:Earthworks – Mining (EW(M)) says “The largest mining operation by far is at Macraes Flat which is separately zoned for (see the Special Purpose Zone – Macraes Mining).” However, these earthworks rules still apply to the Potential Mining Overlay. Therefore if the intention is that the SPZMM will provide for mining at Macraes, then this should be made clearer in the earthworks chapter.

OceanaGold supports the objective and policies which are enabling and recognise the economic and social benefits of prospecting, exploration and mining, whilst ensuring that exploration and mining are conducted in a way which avoids, remedies or mitigates potential adverse effects.

#### 1.1.1.13 Special Purpose Zone – Macraes Mining

The zone has been split into an “Existing Mining Overlay” and a “Potential Mining Overlay”, however the District Plan mapping system does not show these overlays and therefore OceanaGold has not been able to confirm the accuracy of the overlays. OceanaGold supports the two tier approach, but would like to be consulted about the mapping of these overlays when this is undertaken.

OceanaGold is supportive of the purpose statement in SPZMM-O1 “The economic, cultural and social benefits of accessing the significant mineral resource in the Hyde-Macraes Shear Zone are recognised and the continuation of mining is provided for while ensuring any actual or potential adverse effects on the environment from mining activities are avoided, remedied, or mitigated.”

SPZMM-P2 “Potential Mining Overlay” should be amended to take into account that the Potential Mining Overlay will be adjacent to an existing mining area, and is therefore a logical and efficient and sustainable use of land.

“Identify a Potential Mining Overlay within the Special Purpose Zone – Macraes Mining which recognises that mining has not previously occurred in the Overlay area but which may be appropriate for mining activities given it is part of the Special Purpose Zone – Macraes Mining and is adjacent to the Existing Mining Overlay and is an efficient use of land, provided mining activities:

1. avoid, remedy or mitigate the adverse effects from noise, vibration, lighting, or from traffic on amenity values in the adjacent General Rural Zone; and
2. avoid, remedy or mitigate any adverse effects on the landscape values of the surrounding area, taking into account both landscape character and visual effects; and
3. do not compromise the identified characteristics and values of any sensitive environment and achieve the relevant objectives and policies for the sensitive environment; and
4. achieve the objectives and policies contained in the relevant district-wide chapters.”

OceanaGold suggest an amendment to SPZMM-P5 “Primary production, Recreation and Residential Activities” is needed to clarify that the activity is occurring in the Special Purpose Zone.

“Enabling primary production, recreation and residential activities in the Special Purpose Zone – Macraes Mining where these are consistent with the purpose, character and qualities of the adjacent General Rural Zone and do not result in reverse sensitivity effects.”

**1.1.1.14 Conclusion**

OceanaGold would welcome an opportunity to discuss any of the matters raised above with the Council, and to review the Council's evidence in relation to the Taieri Ridge ONL.