Proposed Waitaki District Plan

Section 42A Report: Special Purpose Zone: Macraes Mining Zone

Report on submissions and further submissions

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Abbreviations

Abbreviation	Full Text
Council	Waitaki District Council
CRPS	Canterbury Regional Policy Statement
NES	National Environmental Standard
NES-CF	National Environmental Standards for Commercial Forestry 2023
NES-CS	National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NES-DMRU	National Environmental Standards for Detached Minor Residential Units 2025
NES-ETA	National Environmental Standards for Electricity Transmission and Electric Vehicle Charging Infrastructure Activities
NES-FW	National Environmental Standards for Freshwater 2020
NES-P	National Environmental Standards for Papakāinga 2026
NES-DW	National Environmental Standards for Sources of Drinking Water 2007
NES-TF	National Environmental Standards for Telecommunication Facilities 2016
NPS	National Policy Statement
NPS-EN	National Policy Statement for Electricity Networks 2008
NPS-FM	National Policy Statement for Freshwater Management 2020
NPS-HPL	National Policy Statement for Highly Productive Land 2022
NPS-I	National Policy Statement for Infrastructure 2025
NPS-IB	National Policy Statement for Indigenous Biodiversity 2023
NPS-NH	National Policy Statement for Natural Hazards 2025

Abbreviation	Full Text
NPS-UD	National Policy Statement on Urban Development 2020
NPS-REG	National Policy Statement for Renewable Electricity Generation 2011
NPStds	National Planning Standards
NZCPS	New Zealand Coastal Policy Statement 2010
ODP	Operative Waitaki District Plan
ORPS	Otago Regional Policy Statement 2019
PDP	Proposed Waitaki District Plan
ORPS	Otago Regional Policy Statement 2021
RMA	Resource Management Act 1991
SPZMM	Special Purpose Zone: Macraes Mining Zone

1 Submitters Addressed in Report

The tables below list the original and further submitters addressed in this report.

Table 1: Original Submitters Addressed in this Report

Sub	Submitter Name	on Behalf of	Abbreviation
83	Waitaki District Council		WDC
163	Fire and Emergency New Zealand	Fire and Emergency New Zealand	FENZ 2
166	Horticulture New Zealand		HortNZ
170	Aggregate and Quarry Association		Aggregate & Quarry
176	Terramark Limited		Terramark
194	Director-General of Conservation		DOC
212	Glenbrook Station		Glenbrook
240	Environmental Defence Society Incorporated (EDS)		EDS
242	Ministry of Education Te Tāhuhu o Te Mātauranga		MOED
243	Whitestone Contracting Limited		WCL
246	Federated Farmers of New Zealand Incorporated		FFNZ
249	New Zealand Minerals Council		NZMC
251	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki		Kā Rūnaka
253	Royal Forest and Bird Protection Society of New Zealand Incorporated		Forest & Bird
256	Fish and Game (Otago and Central South Island Fish and Game Councils)		Fish & Game
259	Otago Regional Council		ORC
265	Geoff and Katrina Taylor		G & K Taylor
267	Kelvin and Debbie Weir		K & D Weir
269	Brenda & Ken McLeod		B & K McLeod
271	Canterbury Regional Council		CRC
282	Dogterom Thomson Ltd		DTL
283	Dogterom Hohepa Ltd		DHL
284	Dogterom Duntroon Ltd		DDL
285	Barry and Anne Matthews		B & A Matthews
290	Philip and Becky Wilson		P & B Wilson
291	Peter and Janine Stackhouse		P & J Stackhouse

Sub	Submitter Name	on Behalf of	Abbreviation
292	Robert and Sylvia Borst		R & S Borst
293	Brock and Gemma Hamilton		B & G Hamilton
295	OceanaGold (New Zealand) Limited		OceanaGold
296	Gavin Simpson		G Simpson 2
297	Parkside Holdings Ltd		Parkside
298	Alastair and Carrie Gibson		A & C Gibson
299	Twin Terraces Ltd & Cayuga Ltd		TT & Cayuga
300	Adrianus and Francisca Verbakel & others		A & F Verbakel
301	Carolyn Thelning		C Thelning
302	Peter and Sandra Mitchell		P & S Mitchell
303	Terry and Fiona Conlan		T & F Conlan
304	Kirsty and Nathan McLachlan		K & N McLachlan
305	Erin Nivonne Schultz		E Schultz
306	Waitaki Property Guardians Incorporated		WPG 2
310	Graymont (NZ) Limited		Graymont
312	Springbank		Springbank
313	Geoff & Jan Keeling - Keeling Dairies Limited		Keeling Dairies

Table 2: Further Submitters Addressed in this Report

Sub	Submitter Name	Abbreviation
180	NZ Agricultural Aviation Association	NZAAA
194	Director General of Conservation	DOC
195	New Zealand Pork Industry Board	NZ Pork
246	Federated Farmers of New Zealand	FFNZ
253	Royal Forest & Bird Protection Society of New Zealand Inc	Forest & Bird
287	PKM Farms Limited	PKM Farms
295	OceanaGold	MK Searle
297	Parkside Holdings Limited	Parkside
306	Waitaki Property Guardians Incorporated	WPG2

2 Introduction

2.1 Experience and Qualifications

1. My full name is Marcus Hayden Langman. I am independent planning consultant engaged by Waitaki District Council and have worked on the Waitaki District Plan review for the last 8 years. I have a Bachelor of Resource Studies from Lincoln University (1998).

2. I have over 25 years' planning experience, which includes working in local government, central government and private practice, with a focus on resource management consenting and policy, and having had my own consultancy for the last 10 years. My experience includes a vast array of plan changes, plan development and regional policy development, as well as consenting for small and large projects around New Zealand. In relation to the Proposed Waitaki District Plan, I have prepared a number of draft chapters for the notified plan (including a number that have been withdrawn). I have assisted with the drafting of the SPZMM chapter and s 32 report for the SPZMM and discussed the approach for the chapter with the original chapter author prior to notification. I was the author for the Landscape chapter, the Ecosystems and Indigenous Biodiversity chapter, Natural Character chapter and the Rural chapters and their associated s 32 reports.

3. Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note and that I have complied with it when preparing this report. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person. Having reviewed the submitters and further submitters relevant to this topic I advise there are no real or perceived conflicts of interest that would impede me from providing independent advice to the Hearings Panel.

2.2 Purpose and Scope of this Report

4. The purpose of this report is to provide the Hearing Panel with a summary and analysis of the submissions received on this topic, and to make recommendations in response to those submissions, to assist the Hearing Panel in evaluating and deciding on the submissions.

5. This report is prepared under s 42A of the RMA in relation to the Special Purpose Zone: Macraes Mining Zone in the PDP. It covers the following matters:

- SPZMM provisions;
- The extent of the SPZMM; and
- Definitions relating to the above provisions, including:
    - Biodiversity compensation;
    - Biodiversity effect management hierarchy;
    - Biodiversity offset;

- Ecological district;
- Existing mining area;
- Exploration;
- Indigenous biodiversity;
- Mineral;
- Mining activities;
- Potential mining area;
- Prospecting;
- Quarry;
- Quarrying activity;
- Rural industry; and
- Vegetation clearance.

6. This report considers the submissions and further submissions that were received in relation to the Special Purpose Macraes Mining Zone. It includes recommendations to either retain provisions without amendment, or to delete, add to, or amend provisions in response to submissions. All recommended amendments are shown by way of ~~strikeout~~ and underlining in **Appendix 1** to this Report, or, in relation to mapping, through recommended spatial amendments to the mapping. Footnoted references to the relevant submitter(s) identify the scope for each recommended change. Recommended responses to each submission are given in **Appendix 2**.
7. Where changes are recommended, an evaluation has been undertaken in accordance with Section 32AA of the RMA.
8. The conclusions reached and recommendations made in this report are not binding on the Hearing Panel. It should not be assumed that the Hearing Panel will reach the same conclusions having considered all the information in the submissions and the evidence to be brought before them by the submitters.

2.3 Submissions on Withdrawn PDP Provisions

9. On 15 January 2026, the Council withdrew aspects of the PDP that would no longer be progressed under the Plan Stop provisions in subpart 5B of the RMA. This included withdrawal of:
    a. Cross-references to withdrawn parts of the plan in the user notes;
    b. Amendment to SPZMM-P1 references to the General Rural Zone (withdrawn);
    c. Amendment to SPZMM-P2 Potential Mining Areas references to the General Rural Zone, ONLs, and SNAs, as well as management of effects in accordance with ECO-P2(2) (withdrawn);
    d. Amendment to SPZMM-P4 references to the General Rural Zone (withdrawn);
    e. Amendment to SPZMM-P5 references to the General Rural Zone (withdrawn);
    f. Amendment to SPZMM-R5 references to exclusion of exotic planting in Skink Habitat/Management Areas shown on the planning maps (withdrawn); and

g. Amendment to SPZMM-R17 relating to locations for carbon forestry on highly productive land, within 10m of a significant natural area, and within a Rural Scenic Landscape or sensitive environment (withdrawn).

10. Submissions that were made on aspects of the PDP that have since been withdrawn (or that seek relief relating to topics that have since been withdrawn) are no longer relevant to proceedings. Such submissions related to the SPZMM have been identified by staff, are listed in **Appendix 3**, and are not considered further in this report. Submissions that were made on aspects of the PDP that have since been withdrawn (or that seek relief relating to topics that have since been withdrawn) are no longer relevant to proceedings. Such submissions related to the SPZMM chapter have been identified by staff, are listed in **Appendix 3**, and are not considered further in this report. Please refer to the Hearing Panel minute regarding scope matters.

11. It is possible that some submission points **not** identified in **Appendix 3** may still be wholly or partly outside the scope of the PDP. Any residual scope issues will be dealt with in the appropriate section of this report.

2.4 Other Procedural Matters

12. Two meetings have been undertaken with representatives of OceanaGold to discuss how the provisions of the plan would work in light of the plan stop legislation, I attended the first meeting and the second was attended by Council's Planning Manager, David Campbell and me.

13. The outcome of the meetings was inconclusive, given the complexity of addressing matters that are outside of scope of the hearing process. OceanaGold identified some perceived mapping errors related to the notified zone, which did not reflect the intent of the zoning, including areas that were subject to permits and inclusion of areas that were not subject to permits. They have since provided further details on those areas that are consistent with their submission, and these are addressed in this report.

14. This is particularly in light of the removal of parts of the plan as a result of the plan stop legislation. Subsequent to the meeting, OceanaGold filed a memorandum with the Hearing Panel seeking to confirm that rezoning for the SPZMM would be considered as part of the SPZMM hearing, and that was subsequently confirmed by the Hearing Panel.

3 Topic Overview

3.1 Summary of Relevant Provisions of the PDP

15. This report relates to provisions associated with the Special Purpose Zone: Macraes Mining Zone. There are a range of other chapters that impact on activities within the SPZMM. OceanaGold has sought that the SPZMM form a standalone chapter, rather than have provisions relating to its activities addressed elsewhere in the plan. Those submissions points specific to those topics are addressed in the relevant hearing report for those topics.

16. This section of the report provides a brief summary of the provisions relevant to this topic.

3.1.1 SPZMM provisions

17. The notified chapter is comprised of the introduction, a single objective, and five policies that relate to development within the existing mining areas, potential mining areas, rehabilitation following mining, exploration, and non-mining activities within the zone.

18. As with the balance of the zone provisions in the plan, the rules provide for building activity subject to standards, a range of mining activities, and a range of activities that reflect typical general rural use and use a similar framework to the notified (and subsequently withdrawn) General Rural Zone.

19. 17 permitted activities are provided for representing relatively low impact mining activities and general rural uses. Controlled activity status is applied to exploration in the potential mining area and mining activities in the existing mining area. Mining activities in the potential mining area and rural industry are identified as restricted discretionary activities, with retirement village and educational facilities identified as non-complying activities. The default activity status applying to activities not otherwise provided for is discretionary.

3.1.2 Definitions

20. A number of definitions are addressed as within the scope of this report. These generally relate to mining activities, however a number of the definitions are related to rural activities in the zone or were used more widely in the full plan before parts of the plan were withdrawn, but are still referenced within the SPZMM.

21. The mining related definitions are:

    a. Existing mining area;

    b. Exploration;

    c. Mineral;

    d. Mining activities;

    e. Potential mining area; and

    f. Prospecting.

22. The definitions that had wider application across the plan but are now confined to the SPZMM are:

    a. Biodiversity compensation;

    b. Biodiversity effects management hierarchy;

    c. Biodiversity offset;

    d. Ecological district;

e. Indigenous biodiversity;

f. Quarry;

g. Quarrying activity;

h. Rural industry; and

i. Vegetation clearance.

3.1.3 Extent of the SPZMM

23. The extent of the SPZMM compared to the Macraes Mining Project Mineral Zone in the Operative Waitaki District Plan has increased. The zone is intended to identify land that is subject to permits under the Crown Minerals Act 1991, and areas which are already used for mining purposes or have been subject to resource consents for mining activities. This has included land that has been set aside or protected because of its values, including ecological and historic heritage values.

24. The existing mining area and the potential mining area have not been mapped, and these are intended to operate as dynamic areas that are not subject to a plan change each time a resource consent is approved for development, or mining activities take place. These areas are subject to the definitions in the plan for each area. The intention is that a slightly more permissive approach is provided for in the existing mining area, while greater control is required within the potential mining area as the effects on values within that area a less known or less well understood.

3.2 Background to Relevant Provisions

25. The s 32 report identifies the relevant provisions of the ODP for the Macraes Mining Project Mineral Zone, and the approach taken for management of activities in the zone.[1] In particular, the operative provisions, while providing for mining activity as permitted, classifies most mining activity as requiring consent for a restricted discretionary activity (excavation and construction of pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and tracking associated with mining). The response to this situation was to bring greater focus on the broader mining activities and apply appropriate controls to the key activities that take place as part of mining through mining activities, exploration and prospecting.

26. The notified SPZMM chapter has been drafted on the premise that the area that is subject to the zone is generally intended for mining activities, with a caveat that effects of mining are still required to meet the purpose of the Resource Management Act 1991, and the zone gives effect to the higher order documents such as national policy statements and the Otago Regional Policy Statement. The location of land within the zone does not necessarily mean that mining will always be appropriate, as other values exist.

[1] S 32 Report SPZMM at page 12

27. The chapter was developed on the basis that other rules that manage specific values within the zone would trigger a requirement for consent. For example, where mining activities were to take place that required clearance of indigenous vegetation, that consent would be required for both mining activities, and the clearance of indigenous vegetation where it exceeded the threshold in the plan or occurred in an area identified as a SNA.

28. Waitaki District Council does not have complete information on all of the values of the area subject to the proposed SPZMM. In particular, there are values associated with indigenous biodiversity that affect the land, particularly in the potential mining area. This is particularly relevant to the risk of acting or not acting where there is uncertain or insufficient information about the subject matter of the provisions, and the planning framework to address those shortfalls.

29. The removal of parts of the plan related to those values as a result of the plan stop legislation has meant that a conservative approach to providing for mining activities is required in the zone, as those thresholds no longer exist in the PDP. Continuing with the example of significant indigenous biodiversity, any SNAs that were identified in the notified plan have not been through the Schedule 1 process and have not been subject to challenge on accuracy or detailed submissions.

30. In my opinion, the appropriate response to this is to consider the value attributed to indigenous biodiversity (and other relevant values that might be considered sensitive areas as defined in the plan), through the consenting process. In the interim, while there are no specific rules in relation to vegetation clearance thresholds in the SPZMM, effects on indigenous biodiversity as a result of mining or exploration activities has been retained in relation to controlled and restricted discretionary activities within the zone. The provisions of the ODP and the NPS-IB will still be relevant and applied to those consents under the planning framework, notwithstanding the withdrawal of the ECO chapter. In addition, consideration of effects on other important values which may be impacted by mining or exploration activities can also be considered.

31. The chapter was structured in a way that generally reflected that the predominant land use apart from mining in the zone is farming. As such, provisions reflecting the General Rural Zone provisions were replicated, to enable private landowners in the zone, and lessees, to continue to undertake farming activities, as otherwise provided for in the General Rural Zone. The General Rural Zone has since been determined to be out of scope of the review, however certain provisions have been retained to ensure that the SPZMM has suitable standards which can be applied to rural development within the zone.

32. Finally, the extent of the zone is intended to pick up land that is subject to existing mining operations and land that has not been mined but where OceanaGold holds mining, exploration or prospecting permits issued by the Government under the Crown Minerals Act 1991.[2] OceanaGold seeks to extend this area to include land that is owned by the company, and this is addressed later in this report. Ownership of this land varies,

[2] S 42 Report SPZMM Page 2

with most of the land owned by OceanaGold, while some remains in private ownership but is subject to permits. Land owned by OceanaGold is also leased for pastoral farming. The areas identified as SPZMM builds on and extends the areas identified in the operative plan for the zone. OceanaGold seeks to extend this area to include land that is owned by the company, and this is addressed later in this report.

4 Overview of Submissions

33. The full list of submission points addressed in this report is set out in **Appendix 2**. Overall, 166 original submission points and 63 further submission points are addressed.

34. The following table provides a brief summary of the key issues raised in submissions, which are discussed in more detail in the 'Evaluation of Submissions' section of this report.

Table 3: Summary of Key Issues Raised in Submissions

Issue Name	Summary of Issue	Position of Submitters
Reallocated general submissions	Broad submissions seeking changes to the structure of the plan	4 submission points seek changes to link rules with objectives and/or policies, clear directions for applicants and decision makers, identification of resource management issues, reduction in number of provisions, clear language and removal of unnecessary duplication.
Definitions	A range of changes are sought to definitions in the plan that are relevant to the SPZMM	76 submission points seek either changes or support proposed definitions in the PDP that are relevant to the SPZMM: • Biodiversity compensation • Biodiversity effects management hierarchy • Biodiversity offset • Ecological district • Existing mining area • Exploration • Indigenous biodiversity • Mineral • Mining activities • Potential mining area • Prospecting • Quarry • Vegetation clearance

Issue Name	Summary of Issue	Position of Submitters
Standalone chapter	Whether the SPZMM should be a standalone chapter	5 submission points from OceanaGold and the New Zealand Minerals Council seek that the chapter is provided for as a standalone chapter, to the extent that it does not engage with other chapters of the PDP.
Strategic directions	Whether the strategic directions chapters should recognise the Hyde-Macraes Shear Zone as a significant mineral resource and to enable mineral extraction and ancillary activities.	2 submission points from OceanaGold seek two new strategic objectives that recognise the nature of the shear zone as a significant mineral resource and enable mineral extraction and ancillary activities.
Introduction	Whether the introduction adequately describes the zone	2 submission points from OceanaGold seeks changes to the introduction to better describe the features of the SPZMM.
Useability	Whether introductory notes are sufficient to assist users of the plan.	3 submission points seek changes to the user notes to clarify which parts of the plan are relevant to mining activities in the SPZMM, and in the case of the submission from OceanaGold, seek to recognise its submission seeking a standalone chapter.
Amendments to objectives	Whether the objectives are appropriate and address the activities provided for in the zone.	3 submission points seek changes to the objective. The Director General for Conservation seeks that the proposed objective recognises that natural values SPZMM are maintained. OceanaGold seeks to retain the existing objective, but seeks amendment to recognise the benefits of mining, that all adverse effects cannot be avoided, remedied or mitigated, and that mining is enabled. Graymont Limited seeks greater recognition of quarrying, mining and mineral extraction activities throughout the plan.
Amendments to policies	Whether the policies are appropriate for implementing the objectives and sufficiently provide for mining.	17 submission points seek changes to the policies, variously addressing how activities are managed in existing and potential mining areas, correction of wording, how rehabilitation is provided for, how

Issue Name	Summary of Issue	Position of Submitters
		exploration is provided for, and how non-mining activities are provided for.
New policies	Whether new policies are required to implement the objectives of the PDP	3 submission points seek new policies. OceanaGold has sought two new policies, one to identify how the potential mining area and existing mining area are identified, and the second to provide for mine closure activities. DOC sought an additional policy seeking that new mining areas are considered in an integrated manner with existing mining areas.
Mining activities in existing mining area	Whether mining activities in the existing mining zone are appropriate	13 submission points seek changes to activities in the existing mining area. OceanaGold has sought a range of more permissive activities and seeks to split mining activities up into components of mining. DOC and Kā Rūnaka have generally sought that more effects are addressed in consideration of mining activities.
Mining activities in potential mining area	Whether mining activities in the potential mining area are appropriate	11 submission points seek changes in the potential mining area. Oceana Gold has sought a range of more permissive activities and seeks to split mining activities up into components of mining. DOC and Kā Rūnaka have generally sought that more effects are addressed in consideration of mining activities.
Non-mining activities	Whether the provisions related to non-mining activities are workable and appropriately manage land use in proximity to mining activities within the zone.	23 submission points address non-mining activities in the SPZMM. They variously seek greater control, deletion of rules, or alternative rules to address reverse sensitivity in relation to mining operations, while some submitters seek more flexibility than the proposed rules.
Planning maps including extent of the SPZMM Zone	Whether the extent of the zone is appropriate, taking into account land ownership, mineral permits and resource consents and whether the zone should be free from overlays	4 submission points seek changes to the planning maps to accurately identify the scope of the SPZMM, remove overlay maps, or map the potential mining area.

5 Relevant Statutory Provisions

35. The assessment for the PDP includes the matters identified in sections 74-76 of the RMA. This includes whether:

- it is in accordance with the Council's functions (s74(1)(a));
- it is in accordance with Part 2 of the RMA (s74(1)(b));
- it will give effect to any national policy statement or operative regional policy statement (s75(3)(a) and (c));
- the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA (s32(1)(a));
- the provisions within the plan change are the most appropriate way to achieve the objectives of the District Plan (s32(1)(b)).

36. In addition, assessment of the PDP must also have regard to:

- any proposed regional policy statement, and management plans and strategies prepared under any other Acts (s74(2));
- the extent to which the plan is consistent with the plans of adjacent territorial authorities (s74 (2)(c)); and
- in terms of any proposed rules, the actual or potential effect on the environment of activities including, in particular, any adverse effect.

6 Statutory Instruments

37. The s 32 reports for the Special Purpose Macraes Mining Zone set out the statutory requirements and relevant planning context for this topic in more detail. The section below summarises only the most relevant provisions from the most relevant planning instruments and highlights any pertinent changes to national direction that have occurred since the PDP was notified. Reference should be made to s 32 report for the full list of relevant higher order policy documents, iwi planning documents and strategies prepared under other acts.

6.1 Resource Management Act 1991

38. The following outlines the key sections of the RMA that are relevant to the SMZMM:

    a. Matters of national importance s6(c), s6(f), s6(h);

    b. Other matters s7(b), s7(c), s7(d), s7(f)

    c. Principles of the Treaty of Waitangi s8

39. The SPZMM only addresses these matters to the extent that the matters are addressed in matters of control or matters of discretion. Many of the chapters and overlays that would have applied to these matters have since been withdrawn as a result of plan stop legislation. However, that does not, in my view, preclude them from being referenced in those matters of control or discretion in the PDP.

40. As a result, amendments requested through submissions have taken these matters into account, where they are in the scope of the SPZMM provisions.

6.2 Te Tiriti o Waitangi

41. Under s 8 of the Act, all persons exercising functions and powers under the RMA in relation to managing the use, development and protection of natural and physical resources must take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). Similar obligations are imposed under the Local Government Act 2002 in a manner that is intended to facilitate participation by Māori in local authority decision-making.

6.3 National Policy Statement on Indigenous Biodiversity 2023 (amended 2025)

42. The NPS-IB directs councils to establish consistent approaches in their plans, policy and strategies to maintain indigenous biodiversity. The PDP was notified to give effect to the NPS-IB 2023, but subsequently, changes were made to the NPS-IB in December 2025 to provide for an alternative approach for mineral extraction (which includes mining). The changes provide an exception to Clause 3.10(2), to the extent that any adverse effects on an SNA can be managed under the effects management hierarchy where the activity involves the extraction of minerals and ancillary activities that provide significant national or regional benefit.

43. In my opinion, the mining activities that do occur, and may occur in the future, at Macraes Mine, are at least of regional, if not national benefit. As such, mining activities that occur within the zone should comply with the effects management hierarchy identified in the NPS-IB.

44. The implication of the withdrawal of the ECO chapter means that the directions contained within the NPS-IB will be relevant to processing consents, where effects on indigenous biodiversity are a matter of control or discretion. The responses contained in this report acknowledge those changes, in particular to provide for offsetting and compensation as part of the indigenous biodiversity effects management hierarchy as set out in this report.

6.4 Otago Regional Policy Statement 2021

45. The Otago Regional Policy Statement was made operative on 9 July 2026. There are a number of key provisions related to mining and mineral extraction that now apply since the PDP was notified.

46. Policy ECO-P5 has been developed to reflect the NPS-IB, and makes provision for specified activities to follow the effects management hierarchy in relation to indigenous biodiversity. That is set out below.

ECO-P5 – Provision for specified new activities

Except as provided for by ECO-P1, maintain Otago's indigenous biodiversity by following the sequential steps in the effects management hierarchy (in relation to indigenous biodiversity) when making decisions on plans, applications for resource consent or notices of requirement for the following activities in significant natural areas, or where they may adversely affect indigenous species and ecosystems that are taoka (but not highly mobile fauna) that have been identified by mana whenua as requiring protection:

...

(3) new subdivision, use or development for the purpose of mineral extraction that provides a significant national public benefit that could not otherwise be achieved within New Zealand and that have a functional need to locate within the relevant significant natural area(s) or where they may adversely affect indigenous species or ecosystems that are taoka, and there are no practicable alternative locations,

...

47. The Land and soil chapter of the ORPS is also relevant. It sets out Objectives LF-LS-O12 and LF-LSO13 which relate to mining and development in rural areas:

LF-LS-O12 – Use, development, and protection

The use, development, and protection of land and soil:

(1) safeguards the life-supporting capacity of soil,

(2) sustains the potential of land and soil to meet the reasonably foreseeable needs of future generations while recognising the extractive nature of mining,

(3) contributes to achieving environmental outcomes for fresh water, and

(4) recognises the role of these resources in providing for the social, economic, and cultural well-being of Otago's people and communities.

LF-LS-O13 – Development in rural areas

Use and development in Otago's rural areas occurs in a way that:

(1) provides for the ongoing use of rural areas for primary production and rural industry,

(2) does not compromise the long term viability of primary production and rural communities, and

(3) enables the use and development of native reserves and Māori land

48. These objectives are implemented through the following key policy from the ORPS:

LF-LS-P25 –Rural areas

The management of use and development in rural areas:

(1) *maintains rural areas as places where people live, work and recreate and where a range of activities and services are required to support these rural functions, and provide for social and economic well-being within rural communities and the wider region,*

(2) *prioritises land-based primary production on highly productive land in accordance with the NPSHPL, except as provided for in (4) below,*

(3) *provides for primary production, rural industry, and supporting activities, and recognises:*

(a) *the importance of these activities to the social and economic well-being of Otago's communities, and*

(b) *that mining and aggregate activities can only be located where those resources are present,*

(4) *enables the use by Kāi Tahu of native reserves and Māori land in accordance with MW-P4,*

(5) *restricts the establishment of non-rural activities which could adversely affect, including by way of reverse sensitivity or fragmentation, the productive capacity of highly productive land, or existing or anticipated primary production and rural industry activities, except as provided for in (4) or the NPSHPL, and*

(6) *recognises the national and regional importance of the Otago Corrections Facility to the health, safety and welfare of communities and enables its continued use, upgrading and development, including by:*

(a) *avoiding the establishment of incompatible activities which could give rise to adverse effects on the security and operation of the Facility and/or the welfare of its occupants; and*

(b) *managing the adverse effects of primary production and rural industry on the security and operation of the Facility and/or the welfare of its occupants.*

49. Development of the planning framework in relation to the SPZMM is required to give effect to the provisions of the ORPS, and responses in relation to submissions have taken this into account.

7 Evaluation of Submissions

7.1 Approach to Evaluation

50. Submissions addressed under the SPZMM topic address topics that relate to the SPZMM and are aligned with the key issues identified in Table 3 in the following manner:

- Reallocated general submissions;
- Definitions;
- Whether the chapter should be a standalone chapter;
- Strategic directions;
- Useability;
- Amendments to objectives;
- Policy SPZMM-P1 – Existing Mining Areas;
- Policy SPZMM-P2 – Potential Mining Areas;
- Policy SPZMM-P3 – Rehabilitation after mining;
- Policy SPZMM-P4 – Exploration of Potential Mining Area;
- Policy SPZMM-P5 – Non-mining activities;
- New policies
- Mining activities in the existing mining area;
- Mining activities in the potential mining area;
- Non-mining activities; and
- Planning maps including extent of the SPZMM Zone.

51. The assessment of submissions generally follows the following format:

- A brief summary of the relevant submission points.
- An analysis of those submission points.
- Recommendations, including any amendments to plan provisions and the related assessment under s32AA.

52. For the definitions, the assessment is grouped by each definition.

53. Clause 10(2)(b), Schedule 1 of the RMA provides for consequential changes arising from the submissions to be made where necessary, as well as any other matter relevant to the PDP arising from submissions. Consequential changes recommended under clause 10(2)(b) are footnoted as such.

54. Clause 16(2), Schedule 1 of the RMA allows a local authority to make an amendment to a proposed plan without using a Schedule 1 process, where such an alteration is of

minor effect, or may correct any minor errors. Any changes recommended under clause 16(2) are footnoted as such.

55. Further submissions have been considered in the preparation of this report, but in general, they are not specifically mentioned because they are limited to the matters raised in original submissions and therefore the subject matter is canvassed in the analysis of the original submission. Further submissions may however be mentioned where they raise a valid matter not addressed in an original submission. Further submissions are not listed within Appendix 2. Instead, recommendations on the primary submissions indicate whether a further submission is accepted or rejected as follows:

    - Where a further submission supports a primary submission and the primary submission is recommended to be accepted, or where a further submission opposes a primary submission and the primary submission is recommended to be rejected, the further submission is recommended to be accepted.
    - Where a further submission supports a primary submission and the primary submission is recommended to be rejected, or where a further submission opposes a primary submission and the primary submission recommended to be accepted, the further submission is recommended to be rejected.
    - Where a further submission supports or opposes a primary submission and the primary submission is recommended to be accepted in part, then the further submission is recommended to be accepted in part.

7.2 Provisions where No Change is Sought

56. The following provisions included within SPZMM chapter and within the scope of this report were either not submitted on, or any submissions received sought their retention. As such, they are not assessed further in this report, and I recommend that the provisions are retained as notified:

    - Definition of biodiversity compensation
    - Definition of biodiversity effects management hierarchy
    - Definition of biodiversity offset
    - Definition of exploration
    - Definition of indigenous biodiversity
    - Definition of prospecting
    - Definition of quarry
    - Definition of quarrying activity
    - Definition of rural industry
    - SPZMM-R5 – Amenity planting and shelterbelts
    - SPZMM-R8 – Accessory buildings
    - SPZMM-R22 - Any other activity not provided for as a permitted, controlled, restricted discretionary, discretionary or non-complying activity

7.3 Reallocated general submissions

57. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in Appendix 2. Overall, 4 original submission points are addressed here. There were no further submissions on these submission points.

Submitter Name	Submission Point Number(s)
Terramark	176.2
FFNZ	246.2, 246.1, 246.7

7.3.1 Submissions

58. Terramark [176.2] seeks that the PDP incorporates objectives and policies to support proposed rules in PDP which provide clear direction to consent applicants and decision-makers. It considers that many rules do not include any link or relationship to an objective or policy.

59. FFNZ [246.2, 246.1, 246.7] seeks that there are policies to support rules set out in the PDP which provide clear direction to consent applicants and decision-makers as it considers the PDP lacks a coherent policy framework to justify the rules it contains. It seeks clearer identification of significant resource management issues in the description of the district chapter, the strategic directions chapter and the introductory text for each chapter, or otherwise as required. Lastly, it seeks amendment of the plan to reduce the number of provisions, use of clear and simple language, remove unnecessary duplication and provide clearer cross-referencing between chapters.

7.3.2 Analysis

60. No specific changes are sought to the provisions of the SPZMM chapter as a result of the submissions. I consider that the changes recommended to the chapter as outlined in the following sections addresses to some extent the relief sought by the submitters. However the submission points do provide the Hearing Panel with reasonably wide scope to improve the chapter as it sees fit. Taking into account the recommended changes to the chapter, at this stage I do not propose any amendments as a result of these submissions, pending consideration of further evidence or specific changes sought.

7.3.3 Recommendations

61. I recommend no changes to the proposal.

7.3.4 Evaluation

62. No further evaluation is required.

7.4 Definitions

63. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation

to each point is provided in full in **Appendix 2**. Overall, 69 original submission points and 12 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
Graymont	310.4, 310.13, 310.14, 310.19, 310.20
OceanaGold	295.52, 295.62, 295.63, 295.65, 295.68, 295.69, 295.76
DOC	194.10, 194.16
G & K Taylor	265.19, 265.18
K & D Weir	267.19, 267.18
B & K McLeod	269.19, 269.18
DTL	282.19, 282.18
DHL	283.19, 283.18
DDL	284.19, 284.18
B & A Matthews	285.19, 285.18
P & B Wilson	290.19, 290.18
P & J Stackhouse	292.19, 292.18
R & B Borst	292.19, 292.18
B & G Hamilton	293.19, 293.18
G Simpson	296.19, 296.18
Parkside	297.19, 297.18
A & C Gibson	298.19, 291.18
TT & Cayuga	299.19, 299.18
A & F Verbakel	300.19, 300.18
C Thelning	301.19, 301.18
P & S Mitchell	302.19, 302.18
T & F Conlon	303.19, 303.18
K & N McLachlan	304.18, 304.19
Springbank	312.27, 312.26
Keeling Dairies	313.331, 313.330
ECan	271.34, 271.61
Aggregate & Quarry	170.8, 170.9
FFNZ	246.41
E Schultz	305.18
WPG2	306.15, 306.18
Glenbrook	212.18
EDS	240.14
Fish & Game	256.4

Further Submitter Name	Further Submission Point Number(s)
Parkside	FS297
OceanaGold	FS295
PKM Farms	FS287
Forest & Bird	FS253
NZAAA	FS180
WPG2	FS306
DOC	FS194

7.4.1 Submissions

Ecological district

64. DOC [194.10] supports the definition of ecological district but seeks that it would assist plan users if a map was included in the plan, either as a link or in the ePlan maps.

Existing mining area

65. OceanaGold [295.52] supports the definition of existing mining area but seeks amendments to ensure that the area includes undeveloped areas with appropriate approvals and that the defined area can expand as new lawful and/or consented mining activities occur. It seeks to amend the definition as follows:

    means land within the Special Purpose Zone Macraes Mining that has <u>either</u> received a <u>resource</u> consent (previous or current) for mining-related proposals <u>or</u> and has been the subject of disturbance during the excavation of pits, the construction of waste rock stacks, the construction of haul roads and other tracks, the construction of gold processing plant as well as other ancillary infrastructure and underground mining.

Mineral

66. A number of submitters have sought to exclude industrial rocks and building stones from the definition of mineral.[3] This group of submitters consider that the terms industrial rocks and building stone are problematic as they are both commonly understood as materials that are quarried, not mined. The submitters are also concerned that the definition of mining activities uses the word mineral, yet across the plan there are no objectives, policies or rules in the plan to protect existing mining operations.

67. The definition of mineral is supported by OceanaGold [295.62] and Graymont [310.13].

Mining activities

[3] G & K Taylor [265.19], K & D Weir [267.19], B & K McLeod [269.19], DTL [282.19], DHL [283.19], DDL [284.19], B & A Matthews [285.19], P & J Stackhouse [291.19], R & S Borst [292.19], B & J Hamilton [293.19], G Simpson [296.19], Parkside [297.19], A & C Gibson [298.19], TT & Cayuga [299.19], A & F Verbakel [300.19], C Thelning [301.19], P & S Mitchell [302.19], T & F Conlon [303.19], K & N McLachlan [304.19], Springbank [312.27], and Keeling Dairies [313.331].

68. Three submissions related to the definition of mining activities. ECan [271.34] and Graymont [310.14] supported the definition. OceanaGold [295.63] sought amendments to the definition, to include transport, infrastructure maintenance, upgrades and mine closure activities. The changes sought by OceanaGold to the definition are outlined below:

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

Potential mining area

69. OceanaGold [295.65] seeks a change to the definition for potential mining area. It supports the inclusion of the area in the SPZMM but seeks to ensure that they aren't restricted by overlays or conflicting conditions, and that the definition clearly distinguishes them from the existing mining area, together covering the full SPZMM. The changes sought by OceanaGold are set out below:

    means land within the Special Purpose Zone - Macraes Mining that has not been mined or subject to any mining related disturbance and does not have a resource consent for a mining-related activity. Potential Mining Area includes all land within the Special Purpose Zone – Macraes Mining that is not an Existing Mining Area.

    Also seeks to ensure that these areas are not unduly fettered with other overlays or planning provisions which either directly or inadvertently restrict mining activities from developing there in the future.

Vegetation clearance

70. A number of submitters[4] have sought changes to the definition of vegetation clearance. ECan [271.61] supports the proposed definition. The changes variously relate to what constitutes vegetation clearance, with a number of the requests seeking the same changes. For the reasons set out in the analysis below, the specific changes sought are not summarised.

New definition for regionally significant industry

71. Graymont [310.20] seeks a new definition of regionally significant industry as follows:

    Regionally Significant Industry

[4] DOC [194.16], Glenbrook [212.18], EDS [240.14], FFNZ [246.41], Fish & Game [256.4], G & K Taylor [265.18], K & D Weir [267.18], B & K McLeod [269.18], DTL [282.18], DHL [283.18], DDL [284.18], B & A Matthews [285.18], P & B Wilson [290.18], P & J Stackhouse [291.18], R & S Borst [292.18], B & G Hamilton [293.18], OceanaGold [295.76], G Simpson [296.18], Parkside [297.18], A & C Gibson [298.18], TT & Cayuga [299.18], A & F Verbakel [300.18], C Thelning [301.18], P & S Mitchell [302.18], T & F Conlon [303.18], K & N McLachlan [304.18], E Schultz [305.18], WPG2 [306.18], Springbank [312.26], Keeling Dairies [313.330]

means an industrial activity based on the use of natural and physical resources in the region which has been shown to have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits.

72. It considers that its Makareao plant qualifies as regionally significant industry due to its substantial contributions to the regional and national economy which supplies lime and limestone products across the South Island.

7.4.2 Analysis

Ecological district

73. The submission from DOC [194.10] seeking an addition to the plan of a link (presumably in the definition) or as an addition to the ePlan maps is not considered necessary for the SPZMM chapter. ePlan links to existing map data sets (which are held by DOC) risk redundancy and I do not consider the inclusion of maps in the plan to be in the scope of the refined plan review given the Plan Stop legislation. As such, I consider the submission point should be rejected.

Existing mining area

74. The submission from OceanaGold [295.52] would alter the definition of the existing mining area by providing that where ever land disturbance had taken place within the potential mining area (potentially as a controlled activity such as exploration), that it would become an existing mining area. That is not the intention of the definition, which seeks that the area is defined where resource consent for mining-related proposals *and* the land disturbance is conjunctive. As such, I consider the submission point should be rejected.

Mineral

75. The origin of the definition is from s 2 of the Crown Minerals Act 1991. In the context of the plan as notified, the word mineral is used in relation to both quarrying and mining activities, but I note that mining specifically excludes quarrying in the definition. As such, I do not consider that when, read in context, there is any issue with the definition of mineral as defined.

76. For clarity, I do consider that reference to the Crown Minerals Act 1991 is appropriate, consistent with other definitions defined by that legislation. This can be inserted under Schedule 1 Clause 16(2) as it is a change of minor effect.

Mining activities

77. OceanaGold [295.63] has sought changes to the definition of mining activities, which includes the activities of transport, infrastructure maintenance and upgrading of mining related infrastructure, and mine closure activities. If these activities were not provided for in the definition, they would require consent for a discretionary activity as being activities that are not provided for within the activity tables. I note that these activities are considerations in both SPZMM-R19 Mining activities matters of control within the existing mining area, and SPZMM-R20 Mining activities matters of discretion in the potential mining area. As a result, I conclude that the submission better recognises the components of mining activity and should be accepted.

Potential mining area

78. The submission of OceanaGold [295.65] which largely relates to the definition, seeks to include the word "resource" before consent, as well as including an additional sentence to note that all areas that are not existing mining areas are potential mining areas within the zone. In my opinion, the changes provide clarity to drafting and assist users of the plan with understanding the relationship between the two areas. As such I support the changes requested to the definition.

79. The second part of the submission relates to not unduly fettering the zone with overlays or planning provisions which directly or inadvertently restrict mining activities. Notwithstanding that most of the overlays have been removed, I do not support the changes sought. In my view, that is the process that is required for balancing natural or cultural values alongside mining activity through a resource consent. There may be values present which should be protected, and over-ride the importance of mining. In addition, there may be some areas where alternative methods of extraction, such as underground mining, are more appropriate than opencast mining. Future overlays, should they be implemented through future reviews, may assist with understanding those values and inform an appropriate extraction or protection response.

80. As such, I consider the submission point should be accepted in part.

Vegetation clearance

81. It is recommended that this definition is deemed out of scope for the district plan review. Provisions relating to vegetation clearance, for example in relation to the Ecosystems and Indigenous Biodiversity chapter (as well as other chapters that are deemed out of scope), have been subject to plan stop legislation.

82. The only zone where this term remains is in the SPZMM chapter, in the context of matters of control or discretion under rules SPZMM-R18, SPZMM-R19 and SPZMM-R20. It does not relate to a rule trigger threshold. As such, I am of the view that this definition should be deleted from the plan until such time as it can be considered comprehensively as part of the wider provisions related to the Ecosystems and Indigenous Biodiversity chapter.

83. In the interim, as it applies to the SPZMM, vegetation clearance can fall to its natural meaning and be considered on a broad basis as part of any mining-related consent application. I note that if a definition were to be included in the plan, in the absence of a specific Ecosystems and Indigenous Biodiversity chapter, vegetation clearance would be considered an "activity", with the perverse outcome that it would not be an activity that is specifically provided for in the zone chapters. In the example of the General Residential Zone, this would then default to discretionary under Rule GRZ-R18.

84. I do note that for non-mining activities in the SPZMM, there will be no vegetation clearance rules or standards as a result of the withdrawal of the ECO chapter. The ODP will need to be modified to recognise that where the SPZMM has replaced the Rural S and/or Rural G zone, ODP rules 4.4.7 and 4.4.8 for non-mining activities remain having legal effect – effectively meaning that there are two "zones", the SPZMM, with the ODP rural zones only applying for the purpose of rules 4.4.7 and 4.4.8.

85. Given the analysis above in relation to the ODP, I consider that the definition is not required. As such, I consider the definition should be deleted.

New definition for regionally significant industry

86. Graymont [310.20] seeks a new definition of "regionally significant industry. There is no demonstrable need or resource management purpose to provide a definition of regionally significant industry. The benefits associated with particular activities can be considered alongside its environmental effects as part of consenting projects, with benefits that might be local, district or regional in scale. In addition, including a definition such as sought by the submitter excluding clear guidance or thresholds as to what would qualify as meeting the definition would create ambiguity without any clear benefit as to how it would be applied in a consenting framework.

87. This materially differs, for example, to the definitions of regionally significant infrastructure and nationally significant infrastructure which identify specific infrastructure types as being included within the definitions. These infrastructure types also have specific policy approaches to them under the Otago Regional Policy Statement (and Canterbury Regional Policy Statement where applicable) which alter how higher order policies apply to them. No such approach is taken for Regionally Significant Industry in higher order documents.

88. Taking these matters into account, I do not support the inclusion of a definition for regionally significant industry and consider the submission should be rejected.

7.4.3 Recommendations

89. I recommend the following changes to the proposal.

90. Amend the definitions below in response to submissions as follows:

Mining activities

91. I recommend the following changes in response to OceanaGold's submission [295.63]:

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

Potential mining area

92. I recommend the following changes in response to OceanaGold's submission [295.65]:

> *means land within the Special Purpose Zone - Macraes Mining that has not been mined or subject to any mining related disturbance and does not have a resource consent for a mining-related activity. Potential Mining Area includes all land within the Special Purpose Zone – Macraes Mining that is not an Existing Mining Area.*

Also seeks to ensure that these areas are not unduly fettered with other overlays or planning provisions which either directly or inadvertently restrict mining activities from developing there in the future.

Vegetation clearance

93. I recommend that the definition of vegetation clearance is deleted from the plan as it is out of scope, and that it falls to its natural meaning in the context of the SPZMM, as set out below:

~~means the removal, trimming, felling, or modification of any indigenous vegetation or the deliberate alteration of hydrological functions that support indigenous vegetation.~~

~~It includes:~~

~~1. cutting;~~

~~2. crushing;~~

~~3. cultivation;~~

~~4. over-planting;~~

~~5. soil disturbance including direct drilling;~~

~~6. application of chemicals including herbicide;~~

~~7. burning;~~

~~8. the deliberate application of water, fertiliser or oversowing, where it would change the ecological conditions such that the~~ for ~~resident indigenous plant(s)are killed by competitive exclusion, including dryland cushion field species;~~

~~9. the drainage of wetlands or lakes;~~

~~10. mob-stocking; and~~

~~11. applying seed of exotic pasture~~

~~It does not include incidental loss from:~~

*~~a.~~maintenance ~~grazing of land as part of established farming practice within a site;~~ or

~~b. walking;~~

~~c. sampling or undertaking studies;~~

~~d. natural hazards~~

7.4.3.1 Clause 16(2) Amendments

94. I also recommend the following alterations of minor effect and correction of minor errors, which may be made in accordance with clause 16(2) of Schedule 1 to the RMA, consistent with other definitions originating from the Crown Minerals Act, 1991:

Mineral has the same meaning as in the Crown Minerals Act, 1991 (as set out below):
means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, industrial rocks and building stones, and a prescribed substance within the meaning of the Atomic Energy Act 1945

7.5 Standalone chapter

95. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 5 original submission points and 1 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
OceanaGold	295.47, 295.218, 295.222, 295.13
NZMC	249.2
Further submitter	**Further Submission Point Number(s)**
OceanaGold	FS295

7.5.1 Submissions

96. OceanaGold [295.47, 295.13] and NZMC [249.2] seek that the SPZMM be developed as a stand-alone chapter in the PDP, so that all provisions relating to development within the zone are addressed in it, without reference to other parts of the plan and to avoid conflicts with district-wide provisions. OceanaGold seeks further changes to note that the earthworks provisions do not apply to the SPZMM [295.218], and that the noise provisions do not apply to the SPZMM [295.222].

7.5.2 Analysis

97. The SPZMM is not a stand-alone chapter. Other parts of the plan are relevant to activities that take place in the SPZMM, and the location of topic specific provisions are directed by the National Planning Standards. While it is acknowledged that rules relating to natural character, indigenous biodiversity and landscape have been withdrawn, other relevant rules still apply in remaining chapters.

7.5.3 Recommendations

98. I recommend no changes to the proposal.

7.5.4 Evaluation

99. No further evaluation is required.

7.6 Strategic directions

100. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 2 original submission points and 1further submission points are addressed here.

Submitter Name	Submission Point Number(s)
OceanaGold	295.84, 295.85

Submitter Name	Submission Point Number(s)
Further Submitter	**Further Submission Number(s)**
Forest & Bird	FS253

7.6.1 Submissions

101. OceanaGold seeks two new objectives in the Strategic Directions chapter [295.84, 295.85]. The submission points seek recognition of the Macraes-Hyde Shear Zone as a significant mineral resource that enhances the social and economic wellbeing of the community, and another objective that seeks to enable mineral extraction and ancillary activities in the SPZMM. The objectives sought are:

    To recognise the Hyde-Macraes Shear Zone as a significant mineral resource, thereby enhancing the social and economic well-being of the community.

    To enable mineral extraction and ancillary activities which support it, including specifically within the Special Purpose Zone – Macraes Mining.

7.6.2 Analysis

102. I do not consider that the first requested objective is necessary. This objective is already covered by SPZMM-O1. Further information about the benefits of recognising the Hyde-Macraes Shear Zone outside of the SPZMM is sought from the submitter (if that is what the submitter seeks).

103. In relation to the second requested objective, I do not consider that a specific objective in the Strategic Directions chapter is either necessary or appropriate. The matters that are addressed by the addition sought is already covered by SPZMM-O1. If the intention is to provide for wider recognition for mineral and extraction activities that are outside of the SPZMM, then I consider this could be amended to a wider more general objective.

104. In my opinion, if the Hearing Panel was minded to agree to the addition, the appropriate wording would need to be "provide for" rather than "enable" as there will be situations where consent is required, and that balancing of competing environmental considerations will be needed.

105. As such, I consider the submission seeking additional Strategic Objectives should be rejected.

7.6.3 Recommendation

106. I recommend no changes to the proposal.

7.6.4 Evaluation

107. No further evaluation is required.

7.7 Introduction

108. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in Appendix 2. Overall, 2 original submission points are addressed here.

Submitter Name	Submission Point Number(s)
OceanaGold	295.1, 295.2

7.7.1 Submissions

109. OceanaGold [295.1, 295.2] has made two submission points on the introduction. Firstly it seeks a change to wording in the introduction as follows:

...There are early mining features with historic heritage values within this area as well as areas of indigenous vegetation and habitat for indigenous fauna which are likely to be considered of ~~considerable~~ value.

110. Secondly, it seeks the following changes to the introduction:

The Zone includes land that is owned by OceanaGold, land over which OceanaGold has rights to minerals, land that is covered by minerals permits issued by the government and held by OceanaGold, or by resource consents held by OceanaGold for mining or mining related activities. The Zone is ~~made up of~~ divided into two areas, an 'Existing Mining Area' and a 'Potential Mining Area'. The Existing Mining Area refers to land that has either received resource consents (previous or current) for mining-related proposals or ~~and~~ has been the subject of disturbance during the excavation of pits, the construction of waste rock stacks, the construction of haul roads and other tracks, the construction of the gold processing plant as well as other ancillary infrastructure, and underground mining. Land that has been rehabilitated is farmed under lease and there are a number of covenants that have been put in place elsewhere, as a means to offset the loss of indigenous vegetation and habitat considered to be of value or to protect historic heritage.

7.7.2 Analysis

111. The change proposed by OceanaGold [295.2] to delete the reference to areas likely having "considerable" value, and replacement with "likely to be considered of value" is supported. The extent of the value is something to be determined through a consent process, and the proposed wording provides a more appropriate and neutral drafting without diminishing or pre-determining the value of areas.

112. In relation to the amendment cover by OceanaGold [295.1] relating to the description of the zone, the drafting is generally recommended to be accepted, however it requires deletion of the previous sentence in the paragraph prior to avoid duplication. Subject to those additional amendments, the changes best describe the zone and address the relevant matters that relate to covenants.

7.7.3 Recommendations

113. I recommend the following changes to the proposal.

114. Amend the introduction to the SPZMM in response to submissions of OceanaGold [295.1, 295.2] as follows:

> *The area around Macraes Flat has been mined for gold periodically since the mid 1800's but from 1990 has been subject to ongoing large-scale opencast and underground mining, extracting ore from what is known geologically as the Hyde-Macraes Shear Zone. The Macraes goldmine is the largest in New Zealand and since the commencement of operations over 5 million ounces of gold has been produced. ~~The Special Purpose Zone - Macraes Mining covers approximately 11,200 hectares and is (at the time of writing) in the ownership of Oceana Gold NZ Ltd (OGL), or covered by minerals permits issued by the Government and held by OGL on the date the District Plan was notified (1 March 2025).~~*
>
> *The Zone includes land that is owned by OceanaGold, land over which OceanaGold has rights to minerals, land that is covered by minerals permits issued by the government and held by OceanaGold, or by resource consents held by OceanaGold for mining or mining related activities. The Zone is ~~made up of~~ divided into two areas, an 'Existing Mining Area' and a 'Potential Mining Area'. The Existing Mining Area refers to land that has either received consents (previous or current) for mining-related proposals ~~and~~or has been the subject of disturbance during the excavation of pits, the construction of waste rock stacks, the construction of haul roads and other tracks, the construction of the gold processing plant as well as other ancillary infrastructure, and underground mining. Land that has been rehabilitated is farmed under lease and there are a number of covenants that have been put in place elsewhere, as a means to offset the loss of indigenous vegetation and habitat considered to be of value or to protect historic heritage.*
>
> *The Potential Mining Area refers to land within the Zone that has not been mined or been subject to any mining related disturbance and does not have consent for a mining-related activity. These areas may be pursued in the future depending on the results of detailed prospecting or exploration, and an assessment of financial feasibility (which relates to matters such as gold price and haulage costs). The predominant current land use in the Potential Mining Area is extensive pastoralism under lease. There are early mining features with historic heritage values within this area as well as areas of indigenous vegetation and habitat for indigenous fauna which are likely to be considered of ~~considerable~~ value.*

7.7.4 Evaluation

115. As the changes proposed are descriptive in nature, no further s32AA evaluation is required.

7.8 Useability

116. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 3 original submission points and 2 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
DOC	194.125
NZMC	249.4
OceanaGold	295.3
Further submitter	**Further Submission Number(s)**
OceanaGold	FS295
DOC	FS194

7.8.1 Submissions

117. DOC [194.125] seeks that a reference is included in the User notes of the plan to emphasise the need to check the Historical and Cultural Values and Natural Environment Values of the plan.

118. NZMC [249.4] seeks an amendment to the user notes to differentiate between the provisions relating to Part A: EW and Part B: EWQM.

119. OceanaGold [295.5] seeks an amendment to the User Notes to recognise that the SPZMM is a stand-alone chapter providing for all consent requirements within the zone, and that district-wide provisions only relate to non-mining activities.

7.8.2 Analysis

120. In relation to the submission by DOC [194.125], I consider the reference redundant and places an undue emphasis on specific parts of the plan. I do not consider the request should be accepted.

121. The request by NZMC [294.4] is not supported. As the earthworks provisions relating to the SPZMM are now withdrawn, there are no relevant earthworks provisions in the Earthworks chapter relating to the SPZMM. As a result, quarrying and earthworks activities (that are not otherwise provided for through provision for mining activities) now default to discretionary (being an activity not provided for in the zone) under Rule SPZMM-R22. The only remaining rule in relation to earthworks in the earthworks chapter relates to the area outside of the SPZMM in the notified General Rural Zone (withdrawn). The result of the withdrawal of these provisions means that there are no relevant references to be made to the earthworks chapter.

122. OceanaGold's request [295.5] to amend the user notes is made on the presumption of the SPZMM as a stand-alone chapter. The structure of the plan, and the National Planning Standards, do not provide for the chapter to be undertaken as a standalone

chapter. For example, where indigenous vegetation clearance is required, this matter is required to be addressed in an ECO chapter. It is anticipated that when additional chapters are added to the plan, that these matters will be addressed in subsequent chapters. At that time, further consideration may be given to whether the activity status for mining activities is the most appropriate status, or whether a less restrictive status is appropriate, relying on other trigger thresholds in other chapters to trigger consent.

7.8.3 Recommendation

123. I recommend no changes to the proposal.

7.8.4 Evaluation

124. No further evaluation is required.

7.9 Amendments to objectives

125. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 3 original submission points and 2 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
DOC	194.126
OceanaGold	295.4
Graymont	310.66
Further submitter	**Further Submission Point Number(s)**
OceanaGold	FS295

7.9.1 Submissions

126. DOC [194.126] supports the objective but seeks inclusion of text that would provide that the natural values of the SPZMM be maintained. It considers that only requiring effects to be avoided, remedied or mitigated would potentially allow for significant adverse effects to be able to occur, and that this would be inconsistent with Part 2 and the Council's s31(1)(b)(ii) function to maintain indigenous biodiversity.

127. OceanaGold [295.4] seeks to retain the objective, but include reference to the national, regional and district benefits, recognise that not all adverse effects can be avoided, and that the objective is "enabling" and providing for mining.

128. Graymont [310.66] seeks greater recognition of quarrying, mining and mineral processing as a whole, and the benefits brought about by those activities. No specific change is proposed.

7.9.2 Analysis

129. In relation to the submission by DOC [194.126], I do not consider the relief sought recognises the NPS-IB, which provides for consideration of the indigenous biodiversity effects management hierarchy, which provides for offsetting and compensation. Both of these activities do not necessarily result in the maintenance of natural values. I consider that the amendment proposed in response to the submission from OceanaGold will assist with managing the issue identified by the submitter.

130. I have carefully considered the amendments sought by OceanaGold [295.4] and consider it should be accepted in part. In my opinion, the national, regional and district benefits of mining are already encapsulated in the broad reference to "benefits" and while not the breadth of the benefits at those levels is not disputed, the additional wording is considered unnecessary.

131. I support the inclusion of a reference to offsetting and compensation in the objective, as this in part reflects the NPS-IB effects management hierarchy, and may be relevant to other effects as well. In addition, recognition that some residual effects may be acceptable is an appropriate response and addresses the concern of DOC that significant adverse effects may occur. This will require consideration at consent stage as to whether the balance of residual effects is acceptable.

132. I consider the wording "provided for" in the objective is more appropriate than "enabling". Provided for indicates that there is a broad framework to manage effects, while "enabling" is more synonymous with permitting activities. Mining is an activity that requires careful management, even though it is provided for within the zone.

133. In relation to the submission from Graymont [310.66], as no specific change is sought, I consider the submission point should be rejected.

7.9.3 Recommendations

134. I recommend the following changes to the proposal.

135. Amend SPZMM-O1 to recognise offsetting and compensation and recognition of residual adverse effects in response to the submission by OceanaGold [295.4], as follows:

> *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, offset or compensated, while recognising that some residual effects may be acceptable.*

7.9.4 Evaluation

136. The following s 32AA evaluation addresses the extent to which the proposed changes to the objective better achieve the purpose of the RMA. The proposed change recognises that in achieving the purpose of the Act, that some residual effects may remain as a result of activities occurring in the zone. This is consistent with the understanding that

the Act is not a "no effects" statute. In addition, the change is consistent with the NPS-IB, which applies the effects management hierarchy to effects on significant indigenous vegetation and significant habitats of fauna, by recognising offsetting and compensation. I consider the amendment to be efficient, and effective, and enables consideration by a decision-maker as to whether residual effects are acceptable. While some costs may arise as a result of residual effects, these will be balanced in any consent decision process against the benefits of allowing mining activities, when coming to a determination on acceptability. I consider the amendments recommended better achieve the purpose of the Act, than the drafting as notified.

7.10 Policy SPZMM-P1 Existing Mining Areas

137. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 5 original submission points and 3 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
DOC	194.127
Kā Rūnaka	251.369, 251,370
OceanaGold	295.5
Graymont	310.67
Further submitter	**Further Submission Number(s)**
OceanaGold	FS295

7.10.1 Submissions

138. DOC [194.127] seeks retention of the policy as notified.

139. Kā Rūnaka [251.369, 251.370] seeks changes to the policy to address inconsistency with the definition of existing mining areas, and to recognise that indigenous biodiversity values may be present, regardless of previous avoidance or mitigation measures, and an addition to avoid compromising achievement of the relative objectives and policies of sensitive environments. Kā Rūnaka considers the policy potentially excludes existing or emerging values.

140. OceanaGold [295.5] seeks to delete the policy or amend to provide for prospecting or mining activities where the adverse effect are not significantly different to lawfully established activities or authorised activities. It considers the policy should focus on what activities are allowed, rather than describing the areas.

141. Graymont [310.67] seeks greater recognition of quarrying, mining and mineral processing as a whole and the benefits brought about by those activities. No specific change is proposed.

7.10.2 Analysis

142. I agree with Kā Rūnaka [251.369] that the policy can be simplified by removing the description and consistency with the definition of existing mining area. I recommend this submission point is accepted.

143. In relation to the submission point [251.370] that relates to avoiding compromising the achievement of relevant objectives and policies for any sensitive environments, I do not support the addition as proposed. In the course of undertaking an assessment for a consent, a decision-maker is required to have regard to the relevant provisions of the PDP. Some of those policies will be directive, while others provide flexibility. The decision-maker is guided by those policies in coming to a decision. As such, I consider the amendment sought by the submitter to be redundant. In relation to the reference to maintain indigenous biodiversity values that have previously been avoided or subject to mitigation measures, I consider that it is an important distinction that this is occurring in an area that is already modified. The controlled activity assessment matters will consider effects on biodiversity values, but there may be situations where offsetting and compensation are appropriate, which is not necessarily conducive with maintaining values. As such, I consider that the submission should be rejected.

144. In relation to OceanaGold's submission [295.5], I support the recognition of prospecting and exploration and given the recommended permitted status, I recommend that the policy is drafted to enable these activities. I do not support the second part of the relief sought by the submitter, as this could potentially be limiting on mining activities, if the adverse effects were different to those already consented.

145. In relation to the submission from Graymont [310.67], as no specific change is sought, I consider the submission point should be rejected.

7.10.3 Recommendations

146. I recommend the following changes to proposal.

147. Amend SPZMM-P1 to remove the description of the zone in response to Kā Rūnaka [251.369], recognise prospecting and exploration within the existing mining area in response to OceanaGold [295.5]:

> ~~*The Existing Mining Area within the Special Purpose Zone – Macraes Mining applies to those areas within the zone where mining is occurring and has been authorised by way of past or current resource consents for mining-related activities*~~. *Enable prospecting and exploration, while providing that* ~~*N*~~*new mining activities in the Existing Mining Area are managed to:*
>
> 1. *maintain any indigenous biodiversity values present due to previous avoidance or mitigation measures; and*
> 2. *avoid, remedy or mitigate the effects of noise, vibration, access and lighting on amenity values in the adjoining zone.*

7.10.4 Evaluation

148. The following s32AA evaluation addresses the extent to which the proposed changes are the most appropriate for achieving the objectives of the plan. They more clearly recognise the activities that take place within the existing mining area and are therefore more efficient and effective at achieving the objective for the zone. The policy is consistent with proposed amended objective SPZMM-O1.

7.11 Policy SPZMM-P2 Potential Mining Areas

149. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 5 original submission points and 4 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
WDC	83.12
DOC	194.128
Kā Rūnaka	251.371
OceanaGold	295.6
Graymont	310.68
Further Submitter Name	**Further Submission Number(s)**
OceanaGold	FS295
DOC	FS194

7.11.1 Submissions

150. WDC [83.12] seeks amendment of the policy to remove the word "exceptional" in clause 3 and replace it with "significant". DOC [194.128] seeks a new clause that cross references (to the now removed) ECO-P2. Kā Rūnaka [251.371] supports the policy and specifically seeks that clause 5 is retained. OceanaGold [295.6] seeks deletion of the policy, or a substantial re-write to remove the description of the zone, remove the requirement to avoid locating in sensitive environments in the first instance, include reference to offsetting and compensation, and delete the exception in clause 9 that references the Historic Heritage Chapter. OceanaGold is concerned that overlays may conflict with the zone's purpose and should only apply if they are truly significant. It considers that zoning for mining implies prior analysis confirming an areas suitability for mining. Graymont [310.68] seeks wider recognition for quarrying, mining and mineral processing activities across the plan.

7.11.2 Analysis

151. I consider the wording change proposed by WDC [83.12] is appropriate, as the wording "exceptional" is not a common resource management term, and "significant" is more appropriate. I recommend the submission is accepted.

152. In relation to changes sought by OceanaGold [295.6] I recommend accepting the submission in part. I support the change sought by the submitter to delete the introductory sentence and replace it as sought. This focuses on the activity rather than a description of the zone, which is already a defined term.

153. I do not support the removal of the reference to traffic in clause 1. This has the potential to impact on adjacent landowners and occupiers and is a consideration in relation to the proposed restricted discretionary activity.

154. While parts of the submission are now out of scope due to the plan stop withdrawal, the substance of the provision remains in relation to those matters that have not been subject to the plan stop withdrawal.

155. I do not agree with the submitter that zoning for mining implies prior analysis confirming the areas suitability for mining. That requires detailed investigation, which is anticipated as part of a resource consent process, hence the provision for new mining activities as a restricted discretionary activity. As such, I consider the guidance in relation to SPZMM-P2.2-3 is appropriate.

156. I do agree that reference to offsetting and compensation for reducing unavoidable effects as sought by the submitter is appropriate. In addition, while there is no ECO chapter, the change sought would make the policy consistent with the NPS-IB. As such, I recommend accepting the submission from OceanaGold as outlined above in part.

157. In relation to the submission by DOC [194.128] I note that the reference requested has now been withdrawn. Notwithstanding this, consideration will still be required to be given to the NPS-IB as part of the processing of any consent.

158. In relation to the submission from Graymont [310.68], as no specific change is sought, I consider the submission point should be rejected.

7.11.3 Recommendations

159. I recommend the following changes in response to submissions by WDC [83.12] and OceanaGold [295.6]

160. Amend SPZMM-P2 to delete the word "exceptional" [83.12], amend the introductory sentence to the policy, and reference offsetting and compensation in relation to clause 7 [295.6] as follows:

> ~~*The Potential Mining Area within the Special Purpose Zone – Macraes Mining applies to those areas where mining has not previously occurred in the zone, but which may be appropriate for mining activities, provided that they*~~ *Provide for prospecting, exploration and mining activities within Potential Mining Areas, provided those activities:*
>
> 1. *avoid, remedy or mitigate the adverse effects from noise, vibration, lighting, or from traffic on amenity values in the adjoining zone; and*
> 2. *in the first instance, avoid locating in:*
>
> a. *(withdrawn)*
>
> b. *places containing historic heritage items and*

c. *(withdrawn)*

3. *if it is not practicable to avoid locating in those areas identified in 2(b) above because of the functional needs of the activity, then avoid, remedy or mitigate, as necessary, adverse effects on the values in order to maintain the ~~exceptional,~~ significant or outstanding nature of those areas; and*
4. *(withdrawn)*
5. *do not compromise the identified characteristics and values of any sensitive environment and achieve the relevant objectives and policies for the sensitive environment, except as provided for in 2 and 3 above; and*
6. *avoid adverse effects on the health and safety of the community; and*
7. *reducing unavoidable adverse effects by:*
    a. *staging development for longer-term activities; and*
    b. *progressively rehabilitating the site, where possible; and*
    c. *offsetting or compensating for such effects; and*
8. *applying a precautionary approach (including adaptive management where appropriate) to assessing the effects of the activity where there is scientific uncertainty, and potentially significant or irreversible effects; and*
9. *where there is a conflict between this policy and other policies in the district plan, this policy shall prevail.*

7.11.4 Evaluation

161. The following s32AA evaluation addresses the extent to which the changes to the policy are more appropriate for achieving the objectives of the plan. The proposed changes provide clarity to the policy by more clearly recognising the activities that take place in the potential mining zone rather than providing a description of the zone. The policy provides an appropriate amendment that recognises the ability to offset or compensate for adverse effects that are unavoidable. The change better reflects the amendments made to SPZMM-O1, which also provide for offsetting and compensation. The amendments are considered to be both efficient, in terms of providing clarity, and effective, by enabling implementation of offsetting and compensation, which reflect the policy direction of the NPS-IB effects management hierarchy.

7.12 SPZMM-P3 Rehabilitation after mining

162. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 3 original submission points and 1 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
DOC	194.129
Kā Rūnaka	251.372
OceanaGold	295.8

Submitter Name	Submission Point Number(s)
Further Submitter Name	**Further Submission Number(s)**
OceanaGold	FS295

7.12.1 Submissions

163. DOC [194.129] seeks retention of the policy as notified. Kā Rūnaka [251.372] seeks two additional clauses which relate to measures to contain or otherwise manage contaminants from overburden or disturbed areas to avoid contaminant discharges to waterways, and an addition to provide opportunities to enhance indigenous biodiversity. OceanaGold [295.8] considers that the policy should provide scope to rehabilitate landforms with a vegetation type that differs from what existing previously.

7.12.2 Analysis

164. The changes sought by Kā Rūnaka [251.372] seek to manage contaminants as a result of discharge of contaminants, as well as a change to provide for opportunities to enhance indigenous biodiversity. The matter relating to discharge is a regional council function (including discharge to land, where it may end up in waterways), and I do not consider this to be a relevant consideration for land use consent, as it has the potential to duplicate consenting functions between the authorities. I do support the inclusion of consideration for opportunities to enhance indigenous biodiversity as a matter to be taken into account and recommend that change is made.

165. In relation to OceanaGold's request [295.8] to provide flexibility for replacement vegetation to be a different type to previous vegetation, I consider that this is already built into the policy. The policy only requires particular regard to be had to the matters set out below, rather than strict adherence to, and the wording does not specifically require replacement with the same vegetation.

7.12.3 Recommendations

166. I recommend the following changes to the proposal.

167. Amend SPZMM-P3 to include a new clause in response to the submission from Kā Rūnaka [251.372] such that particular regard is had to opportunities to enhance indigenous biodiversity, as follows:

> *Require any new mining activity and quarrying activities to demonstrate how the site will be rehabilitated, having particular regard to:*
>
> 1. *objectives, measures and timescales for rehabilitation; and*
> 2. *how the landforms will be shaped and revegetated consistent with the natural character of the locality prior to disturbance; and*
> 3. *how the previous vegetation type being removed by land disturbance will be replaced; and*

4. *how the direct transfer of soil and associated vegetation from areas being disturbed to areas being rehabilitated will be undertaken, where the opportunity arises; and*
5. *how topsoil for growing conditions will be provided where direct transfer is not possible; and*
6. *how vegetation will be established, whether by direct planting, or from the broadcasting of seed; and*
7. *how the vegetation cover will be maintained, including, as necessary, the use of fertilisers and other inputs as well as providing weed and pest control; and*
8. *measures to ensure that exposed overburden containing soil or fines is covered or revegetated as soon as practicable, to prevent the generation of dust, soil erosion and sediment transport~~.~~; and*
9. *opportunities to enhance indigenous biodiversity.*

7.12.4 Evaluation

168. The following s32AA evaluation addresses the extent to which the proposed changes are the most appropriate for achieving the objectives of the plan. The addition of recognition of opportunities to enhance indigenous biodiversity is consistent with the NPSIB, in the absence of any provisions in an ECO chapter. The proposed amendment is not inconsistent with the objective, noting that having regard to opportunities to enhance indigenous biodiversity can be a part of mitigating adverse effects from mining activities. The change is considered to be both efficient and effective at giving effect to the NPS-IB and will result in a benefit to indigenous biodiversity where enhancement is undertaken.

7.13 SPZMM-P4 Exploration of Potential Mining Area

169. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 3 original submission points and 3 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
Kā Rūnaka	251.373
OceanaGold	295.9
Graymont	310.69
Further Submitter Name	**Further Submission Number(s)**
OceanaGold	FS295
DOC	FS194

7.13.1 Submissions

170. Kā Rūnaka [251.373] seeks that clause 1 of the policy is deleted, as they consider that the matters addressed in the clause are already covered by clause 3, which references the

management of effects in accordance with policy SPZMM-P2. OceanaGold [295.9] seeks to amend the policy refer to exploration anywhere within the SPZMM and providing for it as a permitted activity in the zone. A similar approach is proposed by OceanaGold in its proposed rule framework. Graymont [310.69] seeks greater recognition of quarrying, mining and mineral processing as a whole, and the benefits brought about by those activities. No specific change is proposed.

7.13.2 Analysis

171. The change sort by Kā Rūnaka [251.373] is supported. The reference in clause 3 is covered by SPZMM-P2. As such, I recommend the submission is accepted.

172. In relation to the submission by OceanaGold [295.9], the change is not supported. The two-tier approach for exploration (permitted in Existing Mining Area, controlled in the Potential Mining Area) is considered appropriate, and addresses a wide range of effects associated with exploration, in particular in new areas that have not been assessed for their values. I consider the submission point should be rejected.

173. In relation to the submission from Graymont [310.69], as no specific change is sought, I consider the submission point should be rejected.

7.13.3 Recommendations

174. I recommend the following changes to the proposal.

175. Amend SMZMM-P4 to delete clause 1 as sought by Kā Rūnaka [251.373] as follows:

> *Recognise the need to investigate the gold resource through exploration in the Potential Mining Area, while controlling the activity to:*
>
> ~~*1. avoid, remedy or mitigate the actual or potential adverse effects on amenity values in the adjoining General Rural Zone; and*~~
>
> *2. requiring rehabilitation of the disturbed ground; and*
>
> *3. manage adverse effects related to exploration in accordance with policy SPZMM-P2.*

7.13.4 Evaluation

176. The following evaluation addresses the extent to which the proposed changes to the policy better implement the objectives of the plan. In relation to the amendment made, the change reduces duplication of matters that are already covered by Policy SPZMM-P2. As such, the proposed change is more efficient at achieving the objective, providing for appropriate management of exploration activities in the potential mining area.

7.14 SPZMM-P5 – Non-mining activities

177. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation

to each point is provided in full in **Appendix 2**. Overall, 2 original submission points and 1 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
MOE	242.80
OceanaGold	295.10
Further Submitter Name	**Further Submission Number(s)**
OceanaGold	FS295

7.14.1 Submissions

178. MOE [242.80] seeks a change to SPZMM-P5 to include educational facilities in the range of non-mining activities that are provided for in the zone. It considers that they should be provided for where there is a need for schools to support the community in the SPZMM, and that they are essential social infrastructure that may need to be located in the zone. OceanaGold [295.10] considers that some of the identified activities in the policy are inappropriate to be enabled as of right. It considers that residential activities, and visitor accommodation should be deleted.

7.14.2 Analysis

179. I have considered the submission from MOE [242.80], and whether there is a demonstrable need for schools within the SPZMM, and have taken into account the extensive rural land surrounding the zone. I consider Education facilities have the potential to give rise to reverse sensitivity effects on mining operations within the zone, particularly in relation to schools, and the possibility of disturbance from mining activities. As such, their inclusion is not supported. No changes are recommended in response to the submission.

180. In relation to the submission from OceanaGold [295.10], I acknowledge that sensitive activities can have reverse sensitivity effects on mining activities. While the zone was developed to implement the same framework for the GRUZ (now withdrawn), the activities provided for in the GRUZ framework is perhaps not the most appropriate method to provide for the purpose of the zone. I do consider there is a balance required to enable existing private landowners within the zone the opportunity to provide for residential activities but consider that provision of visitor accommodation should be restricted. As such, I recommend that the submission is accepted in part as it relates to visitor facilities, but that the reference to residential activities is retained.

7.14.3 Recommendations

181. I recommend the following changes to the proposal.

182. Amend SPZMM-P5 to remove reference to enabling visitor accommodation within the zone as sought by OceanaGold [295.10] as follows:

Enable~~ing~~ primary production, rural industry, recreational activities, conservation activities, small-scale commercial activities, ~~visitor accommodation~~ and residential activities ~~within~~ the Special Purpose Zone – Macraes Mining where these are consistent with the purpose, character and qualities of the General Rural Zone and minimise the potential for reverse sensitivity effects.

7.14.4 Evaluation

183. The following s 32AA evaluation addresses the extent to which the proposed changes to Policy SPZMM-P5 better implement the objectives of the proposed plan, in particular SPZMM-O1. I consider the management of reverse sensitivity effects from visitor accommodation have the potential to limit the benefits associated with the mineral resource from being recognised. The approach is consistent with other policy that recognise the potential for reverse sensitivity effects, while enabling continued use of existing land in private ownership within the zone. The change enables the potential for the more efficient use of land for mining purposes, and limits development that can take place. While there is an opportunity cost to landowners who lose the ability to develop their land for visitor accommodation use, I consider this is outweighed by the benefits of having less potential non-mining development that might restrict mining uses.

7.15 New policies

184. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in Appendix 2. Overall, 3 original submission points and 1 further submission point are addressed here.

Submitter Name	Submission Point Number(s)
OceanaGold	295.7, 295.11
DOC	194.130
Further Submitter Name	**Further Submission Number**
OceanaGold	FS295

7.15.1 Submissions

185. OceanaGold [295.7, 295.11] has sought the inclusion of two new policies in the chapter. The first seeks a new policy to recognise what is defined as "potential mining area" and "existing mining area" as follows:

> *SPZMM-PX Identification of Existing and Potential mining areas*
>
> *Where any new mining activity within the Special Purpose Zone - Macraes Mining is authorised by way of a resource consent or lawful approval process, regard that area as an Existing Mining Area subject to the Zone provisions for Existing Mining Areas.*

186. It has also sought a new policy to address mine closure activities to ensure that these are clearly recognised and provided for as these activities may continue long after extraction ends, as follows:

> *SPZMM-PX Mine closure activities*
>
> *Provide for mining activities that continue after mineral extraction and processing has ceased and recognise that such activities are necessary to achieve successful mine closure.*

187. DOC [194.130] has sought a new policy as set out below, as it considers that given the extent of existing mining, new mining activities cannot be adequately managed in isolation:

> *SPZMM -PX*
>
> *When giving effect to Policies SPZMM-P1 to SPZMM-P3, the adverse effects of new mining activities will be managed in an integrated manner with the effects of existing mining.*

7.15.2 Analysis

188. I do not support the need for an additional policy regarding the identification of existing and potential mining areas. I consider this is suitably addressed in the revised introduction to the chapter and in the revised definitions as set out above. It is not clear what purpose the policy would serve, and as such, I recommend that the submission point [295.7] is rejected.

189. In relation to the proposed policy SPMM-PX – Mine closure activities, I support the addition of the policy put forward by OceanGold [295.11]. I consider that the definition of mining activities is broad and includes a number of activities that take place after mineral extraction and processing have ceased. As such, I consider the addition of the policy to be appropriate, and recommend that the submission is accepted.

190. In relation to the policy sought by DOC, I do not consider it necessary. Any development of mine activities will need to be considered in relation to existing activities, and the RMA already defines an effect as including cumulative effects. I consider that the proposed policy does not add any value to decision-making and recommend that it be rejected.

7.15.3 Recommendations

191. I recommend the following additions to the proposal.

192. Add the following new policy in response to the submission by OceanaGold [295.11] as follows:

> *SPZMM-PX Mine closure activities*
>
> *Provide for mining activities that continue after mineral extraction and processing has ceased and recognise that such activities are necessary to achieve successful mine closure.*

7.15.4 Evaluation

193. The following s32AA evaluation addresses the extent to which the recommended policy implements the objectives of the plan, specifically SPZMM-O1. The recommended addition of the policy recognises that there may be continuing actions required after the extraction and processing on a mining site has ceased. This will assist decision-makers with considering those activities as part of the consideration of resource consents. Such activities may include management of tailings dams, rehabilitation, and conservation management. I consider the addition of the policy better recognises the outcomes sought for the zone. No addition costs are identified, and I consider the only benefits relate to administrative efficiencies to ensure that mine closure and continuing activities are a consideration as part of consent for mining activities. I consider the provisions to be both efficient and effective and will assist with achieving the objectives of the plan.

7.16 Mining activities in the existing mining area

194. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The scope of this section covers the following rules:

    a. SPZMM-R2 – Prospecting;

    b. SPZMM-R3 – Exploration;

    c. SPZMM-R19 – Mining activities;

    d. SPZMM-RX – Mining activities (excluding underground mining, open pits, waste rock stacks and tailing storage facilities) – proposed by OceanaGold; and

    e. SPZMM-RX – Extension of rock stacks, open pits, and tailings storage facilities – proposed by OceanaGold.

    f. SPZMM-RX – Subdivision for mining activities

195. SPZMM-R2 - Prospecting and SPZMM-RX – Subdivision for mining activities cover both the existing mining area and the potential mining area, but for ease of grouping the analysis is covered in this section of the report.

196. The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 13 original submission points and 7 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
OceanaGold	295.15, 295.16, 295.18, 295.41, 295.20, 295.22, 295.26, 295.12
Graymont	310.70, 310.71, 310.73
DOC	194.131
Kā Rūnaka	251.378
Further Submitter Name	**Further Submitter Number(s)**
OceanaGold	FS295

Submitter Name	Submission Point Number(s)
DOC	FS194

7.16.1 Submissions

197. The submission points of Graymont [310.70, 310.71, 310.73] all address the same issue, which is to seek recognition of quarrying, mining and mineral processing as a whole, and the benefits brought about by those activities. No specific change is proposed.

198. In relation to SPZMM-R2 – Prospecting, and SPZMM-R3 – Exploration, OceanaGold [295.15, 295.16] seeks retention of the rules as notified.

199. In relation to SPZMM-R19 – Mining activities, three submitters (as well as Graymont addressed above) made submissions on the proposed rule.

200. DOC [194.131] seeks deletion of the controlled activity rule for mining in the existing mining area. It considers that mining would fail to adequately manage the effects of mining on natural values, that the existing mining area is too uncertain to be used to define activity status, and notes that existing mining areas can have significant natural and other values.

201. Kā Rūnaka [251.378] seeks to add two additional matters of control to address measures to avoid or mitigate adverse effects on the values of sensitive environments and on cultural values, and to include measures to avoid generation of contaminant discharges to waterways. It also seeks the insertion of a reference in SPZMM-R19(8) to EW(M)-APP1.

202. OceanaGold [295.41, 295.18, 295.20, 295.22, 295.24, 295.12] seeks to delete the rule for mining activities and replace with new rules for certain mining activities in the existing mining area as a permitted activity, rather than controlled. It considers that "other" mining activities (with the exception of underground mining, open pits, waste rock stacks and tailings facilities) should be permitted if their effects are similar to existing or consented activities. Where standards are breached for the permitted activity rule (which addresses noise, vibration, lighting and rehabilitation), the activity would become a controlled activity as proposed by the submitter (addressing duration, timing, frequency and staging of works, generation of noise, vibration, lighting, traffic, disturbance of land including vegetation clearance, volumes of material to be moved and consequential size of rock stacks, siting of buildings, infrastructure or other equipment including plant to process minerals, landscaping treatment including shaping of pits and pit margins, rock stacks and embankments, tailings compounds, and dams, siting of roads and tracks, measures to manage long-term structural stability, environmental integrity and safety, measure to maintain indigenous biodiversity, and matters addressed in the content of a rehabilitation plan). Similarly, OceanaGold seeks a new permitted rule that provides for extension of waste rock stacks, open pits, and tailings storage facilities as permitted activities. The structure of the rule is the same as for other mining activities, and there is no appreciable difference between them. Finally, OceanaGold [295.26] seeks a new permitted rule for subdivision where the subdivision is solely for the purpose of

facilitating mining activities including mine closure, with a default consent status of discretionary where that standard is not achieved.

7.16.2 Analysis

203. In relation to the submission points from Graymont [310.70, 310.71, 310.73], as no specific change is sought, I consider the submission points should be rejected.

204. In relation to support for SPZMM-R2 – Prospecting and SPZMM-R3 – Exploration, the remaining submissions support the proposed activities, and no further analysis is required.

205. Turning to SPZMM-R19, I consider it is important to emphasise that as new consents are granted for mining activities in the potential mining area, these will become "existing mining area" according to the definitions for each. The SPZMM is proposed to cover an extensive area of as yet unmodified (by mining) land which may, or is likely to, contain a range of natural and cultural values, and which at some stage in the future as consents are granted for mining, may become existing mining area.

206. DOC [194.131] considers that the controlled activity rule should be deleted, and that all mining activities should be considered a restricted discretionary activity as provided for under rule SPZMM-R20. In my opinion, a controlled activity status is appropriate in an otherwise highly modified environment where mining has taken place (noting that some values may remain). The controlled activity status addresses the matters of concern, particularly given the wider considerations addressed in relation to additional matters put forward by Kā Rūnaka.

207. Kā Rūnaka [251.378] seeks the addition of two matters of control to mining in the existing mining area. The proposed addition of measures to avoid or mitigate adverse effects on sensitive environments and on cultural values is supported, as these may still be present in existing mining areas. To reflect changes to the higher order policies, I also recommend the addition of consequential changes to include offsetting and compensation. The proposal to include measures to avoid generation of contaminant discharges is not supported, as contaminant discharges are a function of the regional council (including to land, and/or water). I consider this would result in unnecessary duplication of local authority functions. The proposal to include reference to EW(M)-APP1 is not supported, as that provision is now withdrawn under the Plan Stop legislation. As such, I recommend the submission is accepted in part.

208. OceanaGold [295.41, 295.18, 295.20, 295.22, 295.24, 295.12] seeks the deletion of the controlled activity rule SPZMM-R19 and replacement of it with four new rules which address different subsets of mining activity as permitted and controlled activities in the existing mining area.

209. The first proposed rule addresses mining activity excluding underground mining, open pits, waste rock stacks and tailing storage facilities, provided for as a permitted activity subject to permitted standards that address noise, vibration and lighting, and rehabilitation. Where the permitted standards are not met, the rule then requires consent for a controlled activity which addresses duration, timing, frequency and staging

of works, generation of noise, vibration, lighting, traffic, disturbance of land including vegetation clearance, volumes of material to be moved and consequential size of rock stacks, siting of buildings, infrastructure or other equipment including plant to process minerals, landscaping treatment including shaping of pits and pit margins, rock stacks and embankments, tailings compounds, and dams, siting of roads and tracks, measures to manage long-term structural stability, environmental integrity and safety, measure to maintain indigenous biodiversity, and matters addressed in the content of a rehabilitation plan.

210. In addition to the new rule for "other" mining activities proposed by the submitter, a permitted rule is proposed for underground mining, a new permitted rule is proposed for extension of waste rock stacks, open pits and tailings storage facilities with a controlled activity if standards are not met, and a new rule for new rock waste stacks, open pits and tailing storage facilities which reflects the Council's notified version of SPZMM-R19. These requested rules are set out in **Appendix 2** in relation to OceanaGold's submission points [295.18, 295.20, 295.22, 295.24].

211. It is not clear how non-compliance with the permitted activity standards relates to the much broader range of effects that are considered under the matters of control for the proposed permitted rule for "other" mining activities, and extension to waste rock stacks, open pits and tailings storage facilities. I consider that this indicates that the range of permitted standards is not sufficiently broad to address the range of effects covered by those mining activities. In particular, an extension of an open pit could be undertaken as a permitted activity, and only need to address noise, vibration and lighting, and a rehabilitation plan. This would not be consistent with protecting values that may remain in the existing mining area.

212. In relation to the proposed permitted status for underground mining in the existing mining area, I note that the submitter has requested a controlled activity status in the potential mining area (addressed in the next section), addressing the generation of noise and vibration, and adverse effects on land stability. I consider at the very least, these matters are also relevant in the existing mining area. As such, I do not support the proposed permitted activity status for underground mining.

213. I note that there are potentially situations where areas covered by consents may have been avoided because of their values. In this situation, a permitted activity status is not, in my opinion, appropriate. The controlled activity rule proposed under SPZMM-R19 (as recommended to be amended) better addresses the full range of effects and enables suitable conditions to be placed on mining development (including avoidance of particular areas, or alternative methods of extraction) in order to protect values that may remain in existing mining areas. The controlled activity status as proposed in SPZMM-R19 enables an holistic consideration of the effects of mining activities, rather than solely focussing on separate components of mining activity. I consider this to be significantly more efficient, and clear, than the option proposed by OceanaGold. As such, I consider the changes sought by OceanaGold should be rejected.

214. Finally, OceanaGold [295.26] seeks the introduction of a new permitted activity for subdivision in the zone. I note that subdivision is, at a minimum, a controlled activity in

the proposed plan, and that subdivision is addressed in the subdivision chapter. It is unclear how the proposed rule would be used to facilitate mine closure, particularly considering that the surrounding area remains rural. The submitter is invited to clarify the relief it is seeking with examples and reasons for a more enabling rule. In the interim, it is recommended that the submission is rejected.

7.16.3 Recommendations

215. I recommend the following changes to the proposal.

216. Amend SPZMM-R19 in response to the submission from Kā Rūnaka [251.378] as follows:

Activity status: Controlled

Matters of control are restricted to:

1. *the duration, timing, frequency, extent and staging of works; and*
2. *the generation of noise, vibration, lighting and traffic; and*
3. *disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and*
4. *siting of buildings, infrastructure, or other equipment, including plant required to process minerals; and*
5. *landscaping treatment, including the shaping of the pits and pit margins, the siting and shaping of waste rock stacks and embankments, tailings impoundments, any other dams and the siting of roads and tracks; and*
6. *measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and private tracks; and*
7. *measures to maintain indigenous biodiversity; ~~and~~*
8. *the matters addressed in the content of the rehabilitation plan~~.~~, and*
9. *measures to avoid, mitigate, offset or compensate adverse effects on the values of sensitive environments and on cultural values.*

Note: Section 88 Information Requirements for Applications:

Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan.

7.16.4 Evaluation

217. The following s 32AA evaluation addresses the extent to which the proposed changes to SPZMM-R19 better implement the objectives of the proposed plan, in particular SPZMM-O1. The proposed changes ensure that actual or potential effects on the environment from mining activity are avoided, remedied, mitigated or compensated, through a slight extension to the range of effects to be considered through the matters of control. The changes as set out improve the management of effects, and reflect the higher order policy directions, in particular those set out in the NPS-IB and the biodiversity effects management hierarchy. While there is a slight increase in cost to those undertaking activities, in my opinion, this is outweighed by the benefits of ensuring the appropriate range of effects from the activity are addressed in any consent application.

7.17 Mining activities in the potential mining area

218. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The scope of this section covers the following rules:

    a. SPZMM-R18 – Exploration;

    b. SPZMM-R20 – Mining activities;

    c. SPZMM-RX – Exploration (in the potential mining area) – proposed by OceanaGold

    d. SPZMM-RX – Mining activities (excluding underground mining, open pits, waste rock stacks and tailings storage facilities) – proposed by OceanaGold

    e. SPZMM-RX – Underground mining – proposed by OceanaGold

    f. SPZMM-RX – Extension to waste rock stacks, open pits and tailings storage facilities – proposed by OceanaGold

    g. SPZMM-RX – Construction of new waste rock stacks, open pits and tailings storage facilities – proposed by OceanaGold

219. The decision requested in relation to each point is provided in full in **Appendix 2**. Overall, 11 original submission points and 10 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
Kā Rūnaka	251.377, 251.379
OceanaGold	295.40, 295.42, 295.19, 295.21, 295.23, 295.25
Graymont	310.72, 310.74
DOC	194.132
Further Submitter Name	**Further Submission Number(s)**
OceanaGold	FS295
DOC	FS194

7.17.1 Submissions

220. The submission points of Graymont [310.72, 310.74] all address the same issue, which is to seek recognition of quarrying, mining and mineral processing as a whole, and the benefits brought about by those activities. No specific change is proposed.

221. In relation to SPZMM-R18 which relates to exploration in the potential mining area, Kā Rūnaka [251.377] seeks to include provision in SPZMM-R18(5) consideration of adverse effect on natural features, natural character and cultural values, along with the proposed listed matters, and seeks to include reference to the earthworks provisions in EW(M) – APP1.

222. Oceana Gold [295.40, 295.17] seeks to delete rule SPZMM-R18, and add in a new rule as follows:

> *SPZMM-RX Exploration*
>
> *Special Purpose Zone - Macraes Mining*
>
> *Potential Mining Area*
>
> *Activity status: Permitted*
>
> *Where:*
>
> *1. Land disturbance must be restricted to 100 m2 per exploration site.*
>
> *2. the generation of noise, vibration and lighting must comply with Standards X, Y, and Z [equivalent to the zone standards for mining activities]; and*
>
> *3. The area must be rehabilitated (if not subsequently mined) as follows:*
>
> *a. topsoil shall be stripped and stockpiled and be reused for rehabilitation purposes*
>
> *b. final rehabilitation earthworks shall be formed such that the contours and transitions closely resemble and blend in with the surrounding natural landform*
>
> *Activity status when compliance is not achieved:*
>
> *Controlled*
>
> *Matters of control are restricted to:*
>
> *1. the duration, timing, frequency, extent and staging of works*
>
> *2. the generation of noise, vibration and lighting; and*
>
> *3. disturbance to land, including vegetation clearance; and*
>
> *4. siting of tracks, parking areas, buildings or other equipment; and*
>
> *5. adverse effects related to landscape, significant historic heritage and significant indigenous biodiversity; and*
>
> *6. the matters addressed in the content of the rehabilitation plan.*
>
> *Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan.*

223. It considers that exploration activities should be permitted throughout the zone as this would reflect the purpose of the zone and the low level of effects associated with exploration activities.

224. In relation to SPZMM-R20, which applies to mining activities in the potential mining area, DOC [194.132] seeks that this rule is amended and applies to all mining in the zone, including the existing mining area. Kā Rūnaka [251.379] seeks that additional values are added to the assessment matters, in relation to natural features and natural character. It also seeks an additional matter is included to address measures to avoid contaminant discharges to waterways. Oceana Gold [295.42, 295.19, 295.21, 295.23, 295.25] seeks that the rule is deleted, and replaced with four new rules that address different elements of mining activities, ranging from permitted to restricted discretionary. The detail of the rules is provided in **Appendix 2**. In summary, they seek a permitted activity status subject to standards for mining activities excluding underground mining, open pits, waste rock stacks and tailings and storage facilities, controlled activity status subject to standards for underground mining, controlled activity status for extension of waste rock stacks, open pits and tailings storage facilities, and restricted discretionary consent status for construction of new rock stacks, open pits and tailings storage facilities.

7.17.2 Analysis

225. In relation to the submission points from Graymont [310.72, 310.74], as no specific change is sought, I consider the submission points should be rejected.

226. In relation to SPZMM-R18 and the request for amendments by Kā Rūnaka [251.377] I consider the submission of Kā Rūnaka should be accepted in part. The reference to natural features, natural character and cultural values is supported. These are matters that are provided for under s6. The recommended cross reference to EW(M) – SPP1 is rejected as that part of the submission is not in scope, as the provisions have been withdrawn.

227. OceanaGold has sought to delete the rule and replace it with a new permitted activity rule in the Potential Mining Area [295.40, 295.17]. I do not support OceanaGold's submission. Exploration still has the potential to have effects adverse effects, particularly given the extensive zoning provided for in the SPZMM. Proposed controlled activity rule SPZMM-R18 addresses a wider range of effects than the permitted standard proposed by the submitter, in particular effects on indigenous biodiversity. The activity as proposed remains controlled, which means that it cannot be declined, but provides safeguards for remediation and consideration of effects, enabling them to be avoided, remedied or mitigated through conditions of consent.

228. The need for a consent is considered particularly relevant, given the plan stop legislation that has withdrawn the Ecosystems and Indigenous Biodiversity chapters and mapped SNAs. This will enable engagement of the indigenous biodiversity effects management hierarchy at a consent level, consistent with giving effect to the NPS-IB Clause 3.11(1) (SNAs) and Clause 3.16(1) (Other areas of indigenous biodiversity).

229. The alternative permitted activity for exploration proposed by the submitter does not provide the same ability to consider those effects. Should the Panel consider that a

permitted status is warranted, land disturbance in Clause 1 as proposed by the submitter should include all roads, tracking, landing and storage areas associated with the exploration site.

230. Turning to SPZMM-R20, three submitters have proposed changes to the rule. DOC [194.132] has requested that the rule be applied to both potential mining area, and the existing mining area. I do not support the requested change. In my opinion, controlled activity status in the existing mining area provides a balance recognising that existing mining activities have occurred, while also providing for consideration and management of effects from new mining activities. Kā Rūnaka [251.379] has sought inclusion of consideration of adverse effects on natural character and natural features. I consider these are important considerations to be given to mining activities, particularly in light of withdrawal of the NATC, NFL and ECO chapters of the plan. In addition, they enable consideration of s 6 matters, if present. In terms of relevant policy direction for consenting, while there is no policy direction in the proposed plan on these matters, the operative plan provides guidance on these matters under Part 2 Issues, Objectives and Policies, Section 16 Rural, which I understand will remain operative as it relates to these matters. This section covers the Macraes Mining Zone. In addition, the provisions and policy directions of the NPSIB will be relevant to consents, as well as the directions contained in the ORPS.

231. OceanaGold [295.42, 295.19, 295.21, 295.23, 295.25] seeks deletion of the restricted discretionary rule SPZMM-R20 and replacement of it with four new rules which address different subsets of mining activity as permitted, controlled and restricted discretionary in the potential mining area.

232. The first proposed rule is for mining activities excluding underground mining, open pits, waste rock stacks and tailing storage facilities, provided for as a permitted activity subject to permitted standards that address noise, vibration and lighting, and rehabilitation. Where the permitted standards are not met, the rule then requires consent for a controlled activity which addresses duration, timing, frequency and staging of works, generation of noise, vibration, lighting, traffic, disturbance of land including vegetation clearance, volumes of material to be moved and consequential size of rock stacks, siting of buildings, infrastructure or other equipment including plant to process minerals, landscaping treatment including shaping of pits and pit margins, rock stacks and embankments, tailings compounds, and dams, siting of roads and tracks, measures to manage long-term structural stability, environmental integrity and safety, measure to maintain indigenous biodiversity, and matters addressed in the content of a rehabilitation plan.

233. In addition to the new rule for “other” mining activities proposed by the submitter, a new controlled activity rule is proposed for underground mining, a new controlled rule is proposed for extension of waste rock stacks, open pits and tailings storage facilities, and a new rule for new rock waste stacks, open pits and tailing storage facilities which reflects the Council’s notified version of SPZMM-R20. These requested rules are set out in **Appendix 2** in relation to OceanaGold’s submission points [295.19, 295.21, 295.23, 295.25].

234. I do not support the proposed permitted activity status for "other" mining activities as sought by OceanaGold in the potential mining area. These activities could result in clearance of vegetation and impact on habitats of indigenous fauna, including Grand and Otago Skinks, through tracking and landing areas and other works that would fall within this activity category. In addition, it is not clear how non-compliance with the permitted activity standards relates to the much broader range of effects that are considered under the matters of control for the proposed permitted rule for "other" mining activities. I consider that this indicates that the range of permitted standards is not sufficiently broad to address the range of effects covered by those mining activities. In particular, an extension of an open pit could be undertaken as a permitted activity, and only need to address noise, vibration and lighting, and a rehabilitation plan. This would not be consistent with protecting values that may remain in the existing mining area.

235. In relation to underground mining as a controlled activity as requested by the submitter, I consider the potential mining area has the potential to include clearance for surface entrance ways, roading and other matters which have the potential to impact on values associated with surface operations. I consider that these matters need to be looked at holistically to consider all effects of mining operations in these new areas where extraction is to take place, with the option to turn consent down if not considered appropriate.

236. I do not support the request to have extension of rock stacks, open pits, and tailing storage facilities as controlled activities in the potential mining area. A controlled activity cannot be declined, and as such, could impact on important values that warrant protection. I consider the restricted discretionary activity status as notified better manages these activities to ensure that where these activities take place, the appropriateness of these is taken into account based on the values present, and where the effects are unacceptable, that discretion is retained to be able to turn down a consent.

237. Finally, I consider that given the matters raised above, the proposal to provide for new rock stacks, open pits and tailings storage facilities as a restricted discretionary activity is redundant, given that I consider SPZMM-R20 should be retained in some form. I consider this to be significantly more efficient, and clear, than the option to replace the rule with four new rules as proposed by OceanaGold. As such, I consider the changes sought by OceanaGold should be rejected.

7.17.3 Recommendations

238. I recommend the following changes to the proposal.

239. Amend SPZMM-R18(5) in response to the submission by Kā Rūnaka [251.377] as follows:

> *adverse effects related to landscape, <u>natural features, natural character, cultural values,</u> historic heritage and indigenous biodiversity; and…*

240. Amend SPZMM-R20(7) in response to the submission by Kā Rūnaka [251.379] as follows:

adverse effects on, and measures to maintain indigenous biodiversity, landscape, natural features, natural character, heritage and cultural values; and

7.17.4 Evaluation

241. The following s 32AA evaluation addresses the extent to which the proposed changes to SPZMM-R18 and SPZMM-R20 better implement the objectives of the proposed plan, in particular SPZMM-O1. The proposed changes ensure that actual or potential effects on the environment from mining activity are addressed when considering consents for exploration and mining activities in the potential mining zone. While there is a slight increase in cost to those undertaking activities, in my opinion, this is outweighed by the benefits of ensuring the appropriate range of effects from the activity are addressed in any consent application.

7.18 Non-mining activities

242. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The scope of this section covers the following rules:

a. SPZMM-R1 – Building activity;

b. SPZMM-R4 – Primary production activities (excluding carbon forestry otherwise provided for in SPZMM-R17, mining activity, quarrying activities, intensive indoor primary production and intensive outdoor primary production);

c. SPZMM-R6 – Residential activity;

d. SPZMM-R7 – Residential unit;

e. SPZMM-R9 – Minor residential unit;

f. SPZMM-R10 – Visitor accommodation;

g. SPZMM-R11 – Home business;

h. SPZMM-R12 – Intensive indoor primary production and intensive outdoor primary production;

i. SPZMM-R13 – Recreational activity;

j. SPZMM-R14 – Conservation activities;

k. SPZMM-R15 – Commercial activity;

l. SPZMM-R16 – Aeroplane airstrips and helicopter landing areas, and use of these by aircraft;

m. SPZMM-R17 – Carbon forestry

n. SPZMM-R21 – Rural industry

o. SPZMM-R23 – Retirement village

p. SPZMM-R24 – Educational facility

243. The decision requested in relation to each point is provided in full in Appendix 2. Overall, 22 original submission points and 5 further submission points are addressed here.

Submitter Name	Submission Point Number(s)
FENZ	163.80
OceanaGold	295.14, 295.27, 295.28, 295.29, 295.31, 295.32, 295.33, 295.34, 295.35, 295.36, 295.37, 295.38, 295.39, 295.43, 295.45, 295.46
Kā Rūnaka	251.374, 295.375, 251.376, 295.380
MOE	242.81
Further Submitter Name	**Further Submission Number(s)**
OceanaGold	FS295
NZ Pork	FS195

7.18.1 Submissions

244. The following submissions address a range of non-mining activities across the SPZMM. They are grouped by submitter, rather than topic.

245. FENZ [163.80] seeks retention of the provisions related to SPZMM-R1 – Building activity, in particular as they relate to the servicing and firefighting water supply and access standard.

246. OceanaGold [295.14, 295.27, 295.28, 295.29, 295.31, 295.32, 295.33, 295.34, 295.35, 295.36, 295.37, 295.38, 295.39, 295.43, 295.45, 295.46] seeks a range of changes to provision for non-mining activities within the zone. It seeks to amend Rule SPZMM-R1 – Building activity to exclude buildings not associated with mining, as it considers these are covered by the definition of mining activity [295.14]. It supports Rule SPZMM-R4 as it relates to primary production activities; no specific reasons are given [295.27]. OceanaGold has made submissions on a number of non-mining activities that it considers are likely to be sensitive to mining activities within the zone, which may result in reverse sensitivity effects on its operations and would be inconsistent with the purpose of the zone. It seeks:

    a. deletion of residential activity as a permitted activity under SPZMM-R6 [295.28];
    b. deletion of residential unit as a permitted activity under SPZMM-R7 [295.29];
    c. deletion of minor residential units under Rule SPZMM-R9 [295.31];
    d. deletion of Rule SPZMM-R10 which provides for visitor accommodation [295.32];
    e. deletion of provision for home businesses under Rule SPZMM-R11 [295.33];
    f. amendment to Rule SPZMM-R12 which relates to intensive indoor and outdoor primary production to suitably recognise that this activity would not be compatible with active operational mining areas [295.34];

g. amendment to Rule SPZMM-R13 which relates to recreational activity [295.35];

h. deletion of Rule SPZMM-R15 which provides for limited commercial activity [295.37]; and

i. consideration of whether those activities should be non-complying alongside the provision for retirement villages as a non-complying activity [295.45].

247. OceanaGold [295.36] seeks an amendment to Rule SPZMM-R14 Conservation activities to exclude conservation activities associated with mining, as it considers these fall under the "mining activities" definition. It seeks an amendment [295.38] to Rule SPZMM-R16 – Aeroplane strips and helicopter landing areas and the use of these by aircraft to include provision for the use of them for exploration, prospecting and conservation activities. OceanaGold [295.39] seeks an amendment to the carbon forestry rule SPZMM-R17 to enable exotic forestry planting on Rural Scenic Landscapes, sensitive environments, or highly productive land within the zone. It seeks a change to the provision SPZMM-R21 – Rural Industry to recognise that the provision excludes rural industry associated with mining, as it considers these fall within the definition of mining activities [295.43]. OceanaGold [295.46] also seeks clarification that onsite training activities, which are part of mining activities, are not mistakenly classified as education facilities under Rule SPZMM-R24 – Educational facilities.

248. Kā Rūnaka [251.374, 251.375, 251.376, 251.380] seek a number of changes in relation to non-mining activity rules. They seek a change to the wording in SPZMM-R4 Primary production title as it implies that carbon forestry that is not otherwise provided for is a permitted activity [251.374]. In relation to SPZMM-R12 – Intensive indoor primary production and intensive outdoor primary production, Kā Rūnaka [251.375] seek setbacks from sensitive environments for these activities. No specific setbacks are proposed. Kā Rūnaka [251.376] seek changes to Rule SPZMM-R17 – Carbon forestry to delete permitted standards PER-2 to PER-6. It considers that if indigenous carbon forestry is intended to be permitted, that several of the standards are unnecessary or inappropriate. Finally, Kā Rūnaka [251.380] seek that an additional matter of discretion is added to the restricted discretionary assessment matters for rural industry, to address adverse effects on the values of sensitive environments and on cultural values.

249. MOE [242.81] seeks that education facilities are provided for as a discretionary, rather than non-complying activity. It considers that the change in activity status provides flexibility without unreasonable restrictions that may be able to best placed to serve the education needs of the zone, noting that educational facilities extend beyond typical schools.

7.18.2 Analysis

250. The following analysis addresses submissions by rule, given that there are a number of submissions on some of the provisions. I note that the principal that the provisions were prepared on was that where land was not being used for mining, that the same provisions that were applied to the GRUZ zone (now withdrawn) would apply within the SPZMM. Having considered the submissions on the plan, I consider this approach needs some refinement to address potential reverse sensitivity effects on mining activities.

251. There are two submissions addressing SPZMM-R1 Building activity. FENZ [163.80] supports the proposed rule, being subject to the servicing and firefighting water supply and access standards as notified. OceanaGold [295.32] seeks to exclude the rule from building activity that is associated with mining. I note that the definition of mining activities does not include buildings, it only applies to the use of land and buildings and associated infrastructure for the purpose of extraction, winning, 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 cleanfill and the use of land and accessory buildings associated with the operation of the mine, and does not include prospecting and exploration and quarrying activities. As such all of the built form standards referenced in the rule apply to mining activities. Any exceedance of those rules for mining activities would require consent. If the relief sought by the submitter was granted, building activity for mining would not be covered by any rules, and would require a discretionary consent. As such, I recommend that the submission from FENZ is accepted and the submission from OceanaGold is rejected.

252. There are two submissions on SPZMM-R4 which relates to primary production activities. Kā Rūnaka [251.374] seeks to amend the heading for SPZMM-R4 consistent with its submission on GRUZ-R2, which is to delete the text "~~otherwise provided for in SPZMMR17~~". This change is supported, as it would otherwise make carbon forestry a permitted activity under this rule. I recommend the submission is accepted. OceanaGold [295.27] seeks that the rule is retained as notified. Subject to the change noted above, I recommend the submission is accepted.

253. SPZMM-R6 relates to residential activity in the zone, SPZMM-R7 relates to residential units, SPZMM-R9 relates to minor residential units, and SPZMM-R11 relates to home businesses. The only submissions on these rules were from OceanaGold [295.28, 295.29, 295.31, 295.33] seeking deletion of the rules (along with its request that these activities are made non-complying activities, which is addressed later). I do not support the relief requested and I consider that limiting private landowners rights for residential use in the zone is an unreasonable limitation on their rights to continue to use their land, just because the land has mining permits that have been granted over them and the zone extended to cover their land. In relation to the deletion of the home business rule, this would prevent someone working from home as a home business, or selling goods produced on their site. I have considered that reverse sensitivity effects may arise, however consider these need to be balanced in consideration of the reasonable use of land. As such, I recommend that the submission is rejected.

254. I consider this differs to some extent from the provision for visitor accommodation under Rule SPZMM-R10. OceanGold [295.32] seeks the deletion of this rule. Sensitive activities have the potential to cause reverse sensitivity effects on mining operations in the zone, and so careful thought needs to be given as to whether they are appropriate. Visitor accommodation is not a common or anticipated activity in the rural area, and I consider that removal of this rule is appropriate to manage reverse sensitivity effects. This will not impact on any activity that benefits from existing use rights and is already established. As a result of the recommended change, the deletion of this rule would provide for the

activity as a fully discretionary activity under SPZMM-R22. I recommend that the submission is accepted and the rule deleted.

255. OceanaGold [295.33] has sought the deletion of Rule SPZMM-R11 – Home business. This rule applies to small-scale businesses and deletion of the rule would restrict someone from working from home within the zone. As such, I do not support the deletion of the rule and recommend that the submission is rejected.

256. SPZMM-R12 provides for intensive indoor and intensive outdoor primary production. Kā Rūnaka [251.375] seek a setback from sensitive areas (as defined in the plan) and OceanaGold [295.34] seeks to retain as notified but also seeks to include provisions that operational mining areas are not affected by the establishment of these activities in the zone and that including suitable setbacks from operational mining would be appropriate. No specific relief is proposed in relation to each of the changes requested (e.g. size of setback). In relation to the submission from Kā Rūnaka, no examples are provided as to the effects of these activities that would generated beyond the boundary of the activity. In relation to the submission of OceanaGold, there is no information about how this type of activity would impact its operations such that a setback would be justified. As such, I consider both submissions should be rejected or further information provided by the submitters as to the relief they seek.

257. OceanaGold [295.35] seeks to amend Rule SPZMM-R13 Recreational activity to suitably recognise that permitted recreational activities would not be compatible with active operational mining areas. As noted previously, sensitive activities have the potential to cause reverse sensitivity effects on mining operations in the zone, and consideration needs to be given as to whether they are appropriate in the context of activities that should be promoted. In my opinion, removal of this rule is appropriate, and I don't consider that it will hinder the reasonable use of private land in the zone, which is predominantly pastoral use. Discretionary resource consent could still be sought should a landowner wish to pursue a recreational activity on their land under SPZMM-R22. As such, I recommend deletion of this rule.

258. In relation to conservation activities provided for in Rule SPZMM-R14, OceanaGold [295.36] has sought to exclude conservation activities associated with mining, as it considers that conservation activities are part of the definition of mining activity. I note that this activity is provided for as a permitted activity throughout the zone. If it were considered a mining activity, a restricted discretionary consent (as proposed) would be required in the Potential Mining Zone. In my opinion this does not make sense, and while these activities could form part of a wider mining application (for example, as mitigation or protection of sensitive areas), it makes better sense that these are permitted rather than require consent. As such, I consider the submission should be rejected.

259. OceanaGold [295.37] seeks deletion of provision for SPZMM-15 – Commercial activity, and clarification as to whether small outlets such as a staff tuck shop would be permitted. This rule provides for very limited retail sales of farming produce produced on the site, refreshment served to group visits to sites used for primary production or residential activities, and handcrafts produced on site. I consider this activity to be very low impact, and associated with normal primary production activities. In a similar

manner to residential activities, I consider limiting this activity on existing privately owned sites would be an unnecessary and unreasonable limitation on the use of that land, and do not consider that reverse sensitivity issues are likely to arise. In relation the submitter's query regarding a tuck shop, the use of buildings for this activity would, in my opinion be considered an ancillary activity related to mining if provided for on site, and only to employees or guests of the mining activity. Taking these matters into account, I recommend that the submission is rejected.

260. OceanaGold [295.38] seeks to amend Rule SPZMM-R16 which relates to airstrips and helicopter land areas and the use of these by aircraft. It seeks to expand the rule, which applies to mining activities, as part of primary production activities, to apply also to exploration and prospecting (which are excluded from the definition of mining activity), as well as conservation activities. I agree with the submitter that this is appropriate and recommend that the change is accepted.

261. There were two submission points on Rule SPZMM-R17 – Carbon forestry. Kā Rūnaka [251.376] considers that if indigenous carbon forestry is intended to be permitted, that several standards are unnecessary or inappropriate. OceanaGold [295.39] seeks to amend the rules so that carbon forestry provides for exotics and to enable planting to occur on highly productive land. In relation to the first submission point, the permitted activity standards seek to manage fire risk, ice formation on roads, shading of adjacent land and/or potentially buildings, and loss of productive land. This has been highlighted as an issue through consultation on the proposed plan, and I consider the standards to be appropriate given that the standards apply to both indigenous and exotic forestry. In relation to OceanaGold's request, I support retention of the standard that encourages use of indigenous species and discourages exotics (which are more than likely to be pinus species). Indigenous species are generally less susceptible to fire and are less likely to result in wilding spread. In addition, given that carbon forestry is permanent (i.e. not subject to forestry harvesting cycles), significant indigenous biodiversity benefits can be obtained through the use of native species. For the reasons set out above, I recommend that both submission points are rejected.

262. In relation to SPZMM-R21 – Rural Industry, which is provided for as a restricted discretionary activity in the zone, there were two submissions. Kā Rūnaka [25.380] seeks to add a new matter of discretion for rural industry to consider adverse effects on the values of sensitive environments and on cultural values. I consider this is appropriate and addresses potential effects on these values. I agree with the amendment sought by OceanaGold [295.43] to exclude mining activities from the rural industry rule. The exemption provides logical drafting as mining is a primary production activity, which is a component of the definition for rural industry, and mining activities are provided for through more specific rules. I recommend both submissions are accepted.

263. OceanaGold [295.45] has sought to include other activities as non-complying along with retirement villages in Rule SPZMM-R23. In relation to the two non-complying activities identified, education facilities and retirement villages, these are two activities that would result in high concentrations of people and are very unlikely to ever be appropriate in the zone. I consider that in relation to other activities that may be sensitive to mining, the

policy framework is sufficiently strong enough to manage most sensitive activities as a discretionary activity. I consider that permitted status for residential activities is appropriate, given that a number of sites within the zone are still actively farmed. As such, I recommend that the submission is rejected.

264. Finally, MOE [242.81] seeks that Rule SPZMM-R24 educational facilities is amended so that they are discretionary, rather than non-complying activities in the zone. In my opinion, as noted above, education facilities in the zone are not considered appropriate, due to the potential for a high concentration of people that often require a quieter learning environment in potentially close proximity to mining activities. There are other locations outside of the zone that are more appropriate. As such, I recommend the submission from MOE is rejected.

7.18.3 Recommendations

265. I recommend the following changes to the proposal.

266. Amend the heading for Rule SPZMM-R4 in response to the submission of Kā Rūnaka [251.374] to remove reference to SPZMM-R17 as follows:

Primary production (excluding carbon forestry ~~otherwise provided for in SPZMM-R17~~, mining activity, quarrying activities, intensive indoor primary production and intensive outdoor primary production).

267. Delete Rule SPZMM-R10 – Visitor accommodation in response to the submission of OceanaGold [295.32] as follows:

~~*SPZMM-R10 Visitor accommodation*~~

~~*Special Purpose Zone – Macraes Mining*~~

~~*Activity status: Permitted*~~

~~*Where:*~~

~~*PER-1*~~

~~*The visitor accommodation is limited to homestays accommodating no more than 5 visitors at any one time; and*~~

~~*PER-2*~~

~~*The site continues to be used for farming or residential purposes; and*~~

~~*PER-3*~~

~~*The activity is principally carried out within a residential unit, or accessory building to a residential unit or primary production activity (excluding mining, quarrying or forestry).*~~

~~*Activity status when compliance is not achieved: Discretionary*~~

~~*Where:*~~

~~*DIS-1*~~

~~*Compliance is not achieved with PER-1, PER-2 and/or PER-3*~~

268. Delete Rule SPZMM-R13 – Recreational activity in response to the submission of OceanaGold [295.35] as follows:

~~*SPZMM-R13*~~

~~*Special Purpose Zone – Macraes Mining*~~

~~*Recreational activities*~~

~~*Activity status: Permitted*~~

269. Amend Rule SPZMM-R16 Aeroplane airstrips and helicopter landing areas, and the use of these by aircraft, in response to the submission of OceanaGold [295.38] as follows:

...

Where:

PER-1

The use is solely for the purpose of primary production, exploration, prospecting, or conservation activities; ***or***

...

270. Amend Rule SPZMM-R21 – Rural industry in response to the submissions of Kā Rūnaka [251.380] and OceanaGold [295.43] as follows:

SPZMM-R21

Special Purpose Zone – Macraes Mining

Rural Industry not associated with mining

Activity status: Restricted Discretionary

Where:

PER-1

The activity is not a potentially high-impact industrial activity.

Matters of discretion are restricted to:

1. *the suitability of the location, site design and layout; and*
2. *the intensity and scale of the activity; and*
3. *the extent of adverse effects on existing or permitted activities; and*
4. *the extent of adverse effects on the safe and efficient operation of the road network, and suitability of onsite loading, manoeuvring and access;~~ and~~*
5. *the provision of infrastructure to service the activity~~.~~; and*
6. *adverse effects on the values of sensitive environments and on cultural values.*

7.18.4 Evaluation

271. The following s32AA evaluation addresses the extent to which the proposed changes to SPZMM-R4, SPZMM-R10, SPZMM-R13, SPZMM-R16 and SPZMM-R21 better implement the objectives of the plan, specifically SPZMM-O1.

272. The change to the heading for SPZMM-R4 primary production removes an ambiguity for carbon forestry and ensures that the provisions under SPZMM-R17 have effect. It ensures the provisions are effective, and no costs or benefits arise.

273. The removal of visitor accommodation (SPZMM-R10) and recreation activities (SPZMM-R13) from being permitted activities better provides for mining activities in the zone, which is the focus of Objective SPZMM-O1. While there is an opportunity cost to private landowners within the zone of not being able to undertake those activities, I consider this to be significantly outweighed by the benefits to providing for mining activities within the zone, to the extent that reverse sensitivity effects on mining activities will be reduced as much as reasonably practicable.

274. The change to SPZMM-R16 to provide for use of airstrips and helicopter landing areas to be extended to use for exploration, prospecting and conservation reflects that these activities don't fall within the definition of mining activities, and therefore primary production, but ensures that use for these activities which are adjunct to mining are able to be undertaken. I consider this an efficient form of the rule and assists with ensuring that use of these sites is not caught out by unnecessary consenting requirements. No costs are considered to be associated with this amendment, but there will be benefits in terms of consenting efficiency for mining operators.

275. Lastly, the amendments to SPZMM-R21 will ensure that for rural industry activity consents, the full range of effects can be considered, and that mining activities are not inadvertently caught in this activity as rural industry. This will enable more efficient administration of the PDP and will ensure appropriate management of the effects of activities.

7.19 Planning maps including extent of the SPZMM Zone

276. The following table sets out the submission points covered in this section of the report (which may be individually or more broadly discussed). The decision requested in relation to each point is provided in full in Appendix 2. Overall, 4 original submission points are addressed here. There were no further submissions on these submission points.

Submitter Name	Submission Point Number(s)
OceanaGold	295.48, 295.231
Kā Rūnaka	251.367, 251.368

7.19.1 Submissions

277. Oceana Gold [295.48, 295.231] lodged two submission points on the planning maps. It seeks to delete any overlays affecting the SPZMM, unless they can be sufficiently justified

from both an environmental and economic position to preserve the zone's enabling intent. It also sought to amend the zone boundary as set out in its submission. It considers that the zone should include all of the following land:

a. Land that is owned by OceanaGold;

b. Land that is covered by minerals permits issued by the government and held by OceanaGold;

c. Land that is covered by resource consents held by OceanaGold for mining or mining related activities; and

d. Land over which OceanaGold holds the rights to minerals.

278. Kā Rūnaka [251.367] opposes the extent of the zone and seek to exclude areas for which there is no mining permit. It considers that including land without a mining permit is inappropriate. They also seek [251.368] to map the potential mining area or provide greater clarity as to when the potential mining area shifts to an existing mining area.

7.19.2 Analysis

279. In relation to the extent of the zone, I consider that the request from OceanaGold [295.231] to define the areas subject to the zone to be appropriate. Correspondence with OceanaGold was undertaken regarding provision of better maps to better understand the zoning request. OceanaGold provided maps back to Council which more clearly show the notified zone and its requested zone and also identified the reasons for the inconsistencies. The full map is provided below.

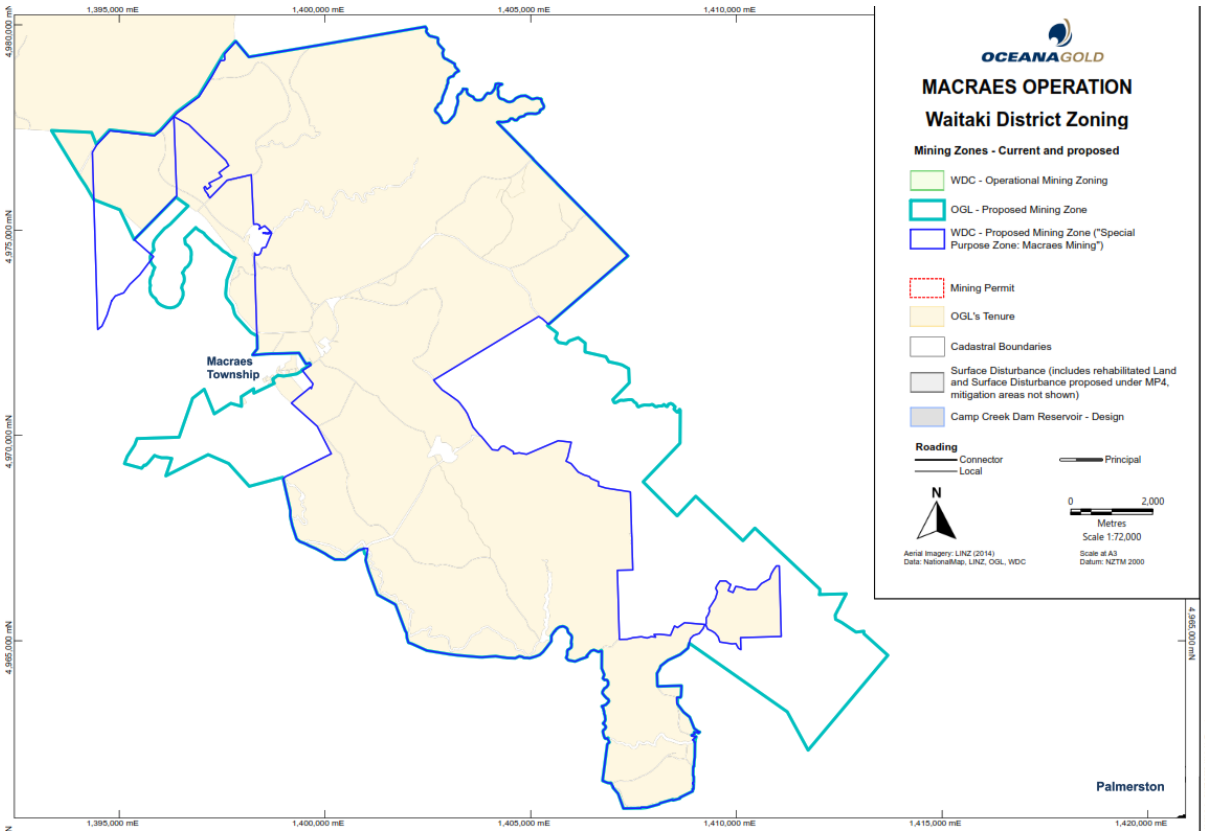


Figure 1. Comparison of notified zone with zone requested by OceanaGold (Source: OceanaGold)

280. One of the areas identifies a triangular piece of land (refer Figure 2, circled in purple) to the north of Macraes township which appears to have been notified as SPZMM in error. OceanaGold does not own the land and it is not within their mining permits. It is recommended that that error is corrected and removed from the SPZMM.



Figure 2. Apparent error in mapping (Source: OceanaGold)

281. In the vicinity of Macraes Township (refer Figure 3, circled in purple), there are also two areas that are not owned by OceanaGold, and are not covered by mining permits. However, in the case of the southern area OceanaGold holds or owns the rights to minerals in that land. In relation to the northern area, OceanaGold holds resource consents for Camp Creek Dam which in a land use sense is a mining activity, and OceanaGold has easement rights of access to that privately owned land. Given this, I recommend that the rezoning sought is accepted.

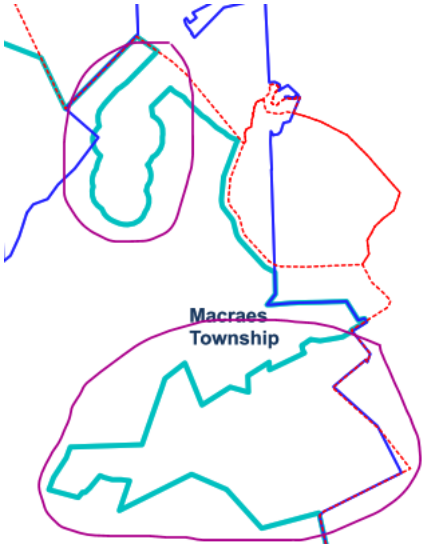


Figure 3. Land covered by consents held by OceanaGold (north) and where Oceana Gold owns rights to minerals (south) (Source: OceanaGold)

282. Further to the south, a large area has been excluded from the notified plan (refer Figure 4, circled in purple), where OceanaGold holds mining permits. Given the land is subject to mining permits, I agree that the land should be included in the SPZMM.

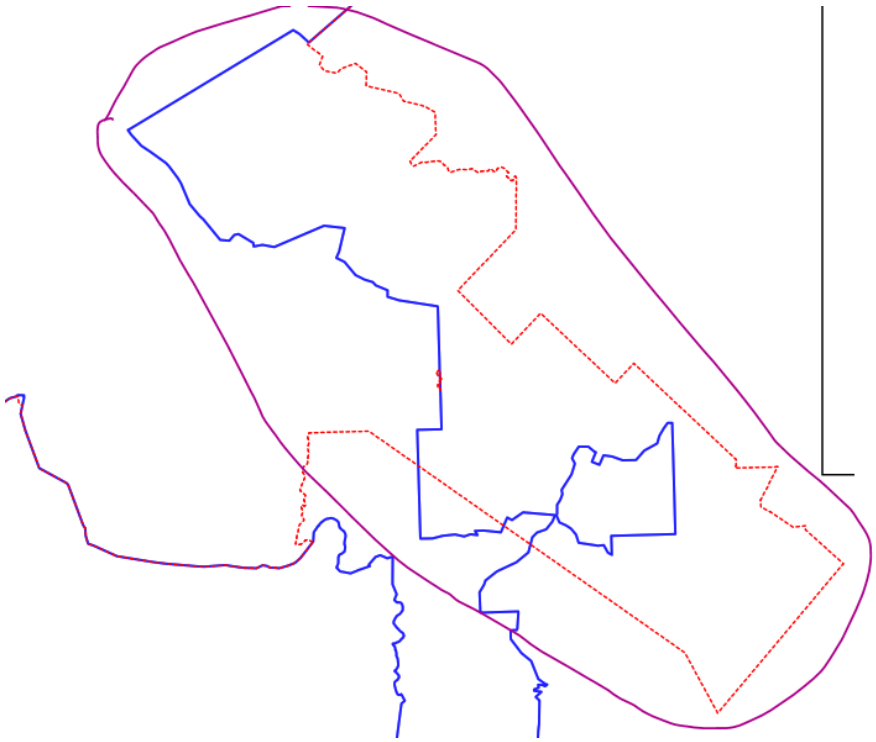


Figure 3. Land covered by consents mining permits outside of the notified SPZMM identified by red-dashed line (Source: OceanaGold)

283. Kā Rūnaka [251.367] seek to exclude areas from the SPZMM for which there is no minerals permit. This largely relates to areas that are either owned by OceanaGold, are subject to mining rights, or in the case of the Camp Creek Dam, are subject to mining-related activities. I do not consider that this creates any substantial issue, given the recommended planning framework. In addition to this, Kā Rūnaka [251.368] seek to map the potential mining area or provide greater clarity as to the process required by which areas shift from potential mining area to existing mining area. I consider this matter is clearly defined by the definitions, and that no mapping is required. As such, I recommend both submission points are rejected.

284. Finally, OceanaGold [295.48] seeks to delete overlays from the plan affecting the SPZMM. I note that a number of these have been subject to plan stop withdrawals. Notwithstanding this, I consider that it is appropriate to include overlays in the plan to manage resources. The presence of mining does not remove the existence of important resources, nor are economic considerations part of the identification of resources which requires balancing as to whether they are included or not. I recommend this submission point is rejected.

7.19.3 Recommendations

285. I recommend the following changes to the proposal.

286. Amend the planning maps to in response to the submission of OceanaGold [295.231] to the boundary as sought in Appendix 1 of its submission.

7.19.4 Evaluation

287. The following s32AA evaluation addresses the extent to which the proposed changes to the mapping achieves Objective SPZMM-O1. In my opinion, the amended mapping reflects the extent of the zone where mining activities are, or are likely to occur, including on land owned/not owned by Oceana Gold, land subject to mining permits, and land subject to mineral rights. The extent of the land better provides for mining activities and applies a planning framework that enables the outcomes sought by SPZMM-O1 to be achieved. While the planning framework is slightly more restrictive for privately owned land, which results in opportunity costs for some classes of activities, the zone extent suitably provides for continuation of existing pastoral farming and residential activities within the zone and provides for the economic benefits of mineral extraction where the effects of mineral extraction can be considered through an appropriate management framework.

8 Conclusion

288. Overall, I consider the notified framework remains sound, notwithstanding the withdrawal over the overlays from the PDP as a result of the plan stop legislation. I consider that the proposal, as recommended to be amended by submissions, ensures that the objective proposed achieves the purpose of the Act, and that the provisions are the most appropriate for implementing the objectives of the PDP, having regard to effectiveness and efficiency, taking into account the costs and benefits of the changes made, and taking into account the risk of acting or not acting where information is uncertain or insufficient.

289. The plan framework recognises that complete information is not available for all of the land rezoned, in particular in relation to matters that may be impacted by mining activities, including, but not limited to, historic heritage, cultural values and indigenous biodiversity. Where possible, the most permissive approach is provided for, taking into account matters that require management through a range of permitted activity standards, matters of control, or matters of discretion. In addition, I consider that the provisions that remain as a result of plan stop give effect to the higher order policy documents, and implement the National Planning Standards.

290. A summary of the recommendations and key reasons is set out below, with recommendations to accept or reject the submissions as set out in the body of this report, and **Appendix 2**.

8.1 Definitions

291. In relation to the definitions, changes are recommended to the definitions of mining activity and potential mining area, with the proposed deletion of the definition of vegetation clearance. A Clause 16(2) change is recommended to the definition of mineral

to add reference to the Crown Minerals Act 1991. I consider the change to the definition of mining activities will better address the range of activities covered by that activity. I consider the amendment to potential mining area provides clarification that it is land within the zone that is not an existing mining area. The deletion of the vegetation clearance definition enables the use of that reference in the SPZMM chapter to fall to its natural definition.

8.2 Standalone chapter

292. I recommend no changes to the chapter that it be a standalone chapter. The chapter is consistent with the National Planning Standards relating to content within various remaining chapters of the PDP.

8.3 Strategic directions

293. I recommend no changes to the strategic directions chapter to include new strategic objectives as sought by OceanaGold. The matters are already covered by SPZMM-O1 and as sought only relate to the SPZMM. I consider the existing objective for the zone sufficiently addresses the matters raised by the submitter.

8.4 Introduction

294. I recommend changes are made to the introduction to the chapter to address the submissions of OceanaGold. I consider that they clearly state the possibility of values existing, and describe an appropriate extent of land that should, in my opinion, be zoned SPZMM.

8.5 Useability

295. I recommend no changes to the chapter in relation to submissions on useability. Submissions made on the plan were either redundant as a result of withdrawal of parts of the plan, or related to the function of the plan as an overall standalone chapter.

8.6 Objectives

296. I recommend a change to the objective SPZMM-O1 to recognise that effects can be offset or compensated, while also recognising that some residual adverse effects may be acceptable. I consider this better reflects the higher order documents, in particular the NPS-IB and the effects management hierarchy. The changes recognise that the RMA is no a “no effects” statute and will provide for balancing considerations on resource consents.

8.7 Policies

297. In relation to submissions on the policies, I recommend a number of changes to SPZMM-P1 – Existing mining areas, SPZMM-P2 – Potential mining areas, SPZMM-P3 – Rehabilitation after mining, SPZMM-P4 – Exploration of the potential mining area, SPZMM-P5 – non-mining activities, and the inclusion of a new policy SPZMM-PX – Mine closure activities. I consider the amendments proposed to those policies more express the purpose of the policies and better address the range of effects that can occur as part of activities on the land – both for mining and non-mining activities. I consider the new policy better provides recognition and consideration of activities that take place after mining extraction activities have been completed, and will assist decision-makers and applicant to turn their mind to those activities as part of proposals for rehabilitation, ongoing tailings storage, and other maintenance as part of mine closure.

8.8 Mining activities in the existing and proposed mining areas

298. I recommend changes to SPZMM-R19 – Mining activities in relation to the matters of control in the existing mining area, SPZMM-R18 – Exploration in the proposed mining area and SPZMM-R20 – Mining activities in the proposed mining area. The changes better reflect the range of matters that can be impacted by exploration and mining activities, including effects on sensitive environments and cultural values.

8.9 Non-mining activities

299. A number of changes are recommended to the provision for non-mining activities in the SPZMM. Changes to SPZMM-R4 address an inconsistency in the reference to carbon forestry which is not required. Particular activities that could potentially result in reverse sensitivity effects on mining are also recommended to be removed as permitted activities (SPZMM-R10 – Visitor accommodation and SPZMM-R13 – Recreational activities). No change has been made to the request to remove residential activity, residential units or minor residential units, as it is considered that a reasonable use of rural land should be able to continue. The scope of the use of airstrips and helipads is proposed to be expanded to include other mining related activities under Rule SPZMM-R16, as these are considered to be likely uses associated with the zone. SPZMM-R21 – Rural industry is recommended to be amended to exclude mining, given that the definition for rural industry references primary production which includes mining activities. It is also recommended that an additional assessment matter is included addressing adverse effects on sensitive environments and cultural values.

8.10 Planning maps and the extent of the SPZMM

300. I recommend changes to the planning maps to increase the area of the SPZMM to reflect the submission of OceanaGold to include land that is owned by them, subject to minerals permits, or is subject to mining-related consents. I consider this accurately addresses the extent of the zone, and the likely area subject to interest for mining activities.

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Appendix 1
Recommended Changes to Provisions

Appendix 2
Recommended Responses to Submissions

Appendix 3
Submissions on Withdrawn Provisions

Special Purpose Zone — Macraes Mining

Introduction

The area around Macraes Flat has been mined for gold periodically since the mid 1800's but from 1990 has been subject to ongoing large-scale opencast and underground mining, extracting ore from what is known geologically as the Hyde-Macraes Shear Zone. The Macraes goldmine is the largest in New Zealand and since the commencement of operations over 5 million ounces of gold has been produced. ~~The Special Purpose Zone - Macraes Mining covers approximately 11,200 hectares and is (at the time of writing) in the ownership of Oceana Gold NZ Ltd (OGL), or covered by minerals permits issued by the Government and held by OGL on the date the District Plan was notified (1 March 2025).~~

The Zone includes land that is owned by OceanaGold, land over which OceanaGold has rights to minerals, land that is covered by minerals permits issued by the government and held by OceanaGold, or by resource consents held by OceanaGold for mining or mining related activities. The Zone is ~~made up of~~divided into two areas, an 'Existing Mining Area' and a 'Potential Mining Area'. The Existing Mining Area refers to land that has either received consents (previous or current) for mining-related proposals ~~and~~or has been the subject of disturbance during the excavation of pits, the construction of waste rock stacks, the construction of haul roads and other tracks, the construction of the gold processing plant as well as other ancillary infrastructure, and underground mining. Land that has been rehabilitated is farmed under lease and there are a number of covenants that have been put in place elsewhere, as a means to offset the loss of indigenous vegetation and habitat considered to be of value.

The Potential Mining Area refers to land within the Zone that has not been mined or been subject to any mining related disturbance and does not have consent for a mining-related activity. These areas may be pursued in the future depending on the results of detailed prospecting or exploration, and an assessment of financial feasibility (which relates to matters such as gold price and haulage costs). The predominant current land use in the Potential Mining Area is extensive pastoralism under lease. There are early mining features with historic heritage values within this area as well as areas of indigenous vegetation and habitat for indigenous fauna which are likely to be considered of ~~considerable~~ value.

Please note that the Existing Mining Area and Potential Mining Area are not mapped.

User Notes:
For some activities, a resource consent may be required by rules in more than one chapter in the District Plan. Plan users are encouraged to check all District-Wide Matters chapters.
~~Earthworks (excluding mining activities) or quarrying for aggregate activities that take place within the Special Purpose Zone — Macraes Mining are subject to the provisions in Part A and Part B of the Earthworks Chapter~~.
For new buildings or structures, other relevant rules may include (but not limited to) the following;
Rule NH-R13 in the Natural Hazards chapter - applies to residential units or other principal buildings near woodlots, shelterbelts and plantation forestry, and vice versa.
~~Rule NATC-R1 in the Natural Character chapter - applies to structures within a riparian margin~~.
Rule INF-R29 in the Infrastructure chapter - applies to buildings and structures within the National Grid Yard.
Rule INF-R30 in the Infrastructure chapter - applies to buildings and structures within the Electricity Distribution Yard.
Please refer to the General Approach chapter for more information on the steps plan users should take to determine what rules apply to an activity and to determine the consent status of an activity.

Objectives

SPZMM-O1	Purpose of the Special Purpose Zone — Macraes Mining
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, offset or compensated, while recognising that some residual effects may be acceptable.	

Policies

SPZMM-P1	Existing Mining Areas

~~The Existing Mining Area within the Special Purpose Zone — Macraes Mining applies to those areas within the zone where mining is occurring and has been authorised by way of past or current resource consents for mining-related activities.~~Enable prospecting and exploration, while providing that ~~N~~new mining activities in the Existing Mining Area are managed to:

1. maintain any indigenous biodiversity values present due to previous avoidance or mitigation measures; and
2. avoid, remedy or mitigate the effects of noise, vibration, access and lighting on amenity values in the adjoining ~~General Rural Zone~~zone.

SPZMM-P2	Potential Mining Areas

~~The Potential Mining Area within the Special Purpose Zone — Macraes Mining applies to those areas where mining has not previously occurred in the zone, but which may be appropriate for mining activities, provided that they~~Provide for prospecting, exploration and mining activities within Potential Mining Areas, provided those activities:

1. avoid, remedy or mitigate the adverse effects from noise, vibration, lighting, or from traffic on amenity values in the adjoining ~~General Rural Zone~~zone; and
2. in the first instance, avoid locating in:
   a. ~~Outstanding Natural Features or Landscape;~~
   b. places containing historic heritage items~~; or~~;and
   c. ~~Significant Natural Areas or areas of indigenous vegetation assessed as being significant under APP5 – Criteria for identifying areas that qualify as SNA; and~~
3. if it is not practicable to avoid locating in those areas identified in ~~2(a) or~~ 2(b) above because of the functional needs of the activity, then avoid, remedy or mitigate, as necessary, adverse effects on the values in order to maintain the ~~exceptional,~~ significant or outstanding nature of those areas; and
4. ~~if it is not practicable to avoid locating in areas identified under (2)(c) above, then managing the effects in accordance with Policy ECO-P2(2); and~~
5. do not compromise the identified characteristics and values of any sensitive environment and achieve the relevant objectives and policies for the sensitive environment, except as provided for in 2 and 3 above; and
6. avoid adverse effects on the health and safety of the community; and
7. reducing unavoidable adverse effects by:
   a. staging development for longer-term activities; and
   b. progressively rehabilitating the site, where possible; and
   c. offsetting or compensating for such effects; and
8. applying a precautionary approach (including adaptive management where appropriate) to assessing the effects of the activity where there is scientific uncertainty, and potentially significant or irreversible effects; and
9. where there is a conflict between this policy and other policies in the district plan ~~(except in relation to the Historic Heritage Chapter)~~, this policy shall prevail.

SPZMM-P3	Rehabilitation after mining

Require any new mining activity and quarrying activities to demonstrate how the site will be rehabilitated, having particular regard to:

1. objectives, measures and timescales for rehabilitation; and
2. how the landforms will be shaped and revegetated consistent with the natural character of the locality prior to disturbance; and
3. how the previous vegetation type being removed by land disturbance will be replaced; and
4. how the direct transfer of soil and associated vegetation from areas being disturbed to areas being rehabilitated will be undertaken, where the opportunity arises; and
5. how topsoil for growing conditions will be provided where direct transfer is not possible; and
6. how vegetation will be established, whether by direct planting, or from the broadcasting of seed; and
7. how the vegetation cover will be maintained, including, as necessary, the use of fertilisers and other inputs as well as providing weed and pest control; and
8. measures to ensure that exposed overburden containing soil or fines is covered or revegetated as soon as practicable, to prevent the generation of dust, soil erosion and sediment transport~~.~~; and
9. opportunities to enhance indigenous biodiversity.

SPZMM-P4	Exploration in the Potential Mining Area

Recognise the need to investigate the gold resource through exploration in the Potential Mining Area, while controlling the activity to:

1. ~~avoid, remedy or mitigate the actual or potential adverse effects on amenity values in the adjoining General Rural Zonezone; and~~
2. requiring rehabilitation of the disturbed ground; and
3. manage adverse effects related to exploration in accordance with policy SPZMM-P2.

SPZMM-P5	Non-mining activities
Enable~~ing~~ primary production, rural industry, recreational activities, conservation activities, small-scale commercial activities~~, visitor accommodation~~ and residential activities within the Special Purpose Zone — Macraes Mining where these are consistent with the purpose, character and qualities of the ~~General Rural Zone~~adjoining zone and minimise the potential for reverse sensitivity effects.	
SPZMM-PX	**Mine closure activities**
Provide for mining activities that continue after mineral extraction and processing has ceased and recognise that such activities are necessary to achieve successful mine closure.	

Rules

PERMITTED ACTIVITIES

SPZMM-R1	Building activity	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted** **Where:** PER-1 Where all of the following standards are complied with where relevant: 1. GRUZ-S2 Maximum height; 2. GRUZ-S3 Building coverage; 3. GRUZ-S4 Road and rail boundary setbacks; 4. GRUZ-S5 Internal boundary setback; 5. GRUZ-S6 Frontage fencing; 6. GRUZ-S7 Crop protection structures; 7. GRUZ-S9 Servicing and firefighting water supply and access.	**Activity status when compliance is not achieved: Restricted Discretionary** **Where:** RDIS-1 Compliance is not achieved with PER-1(1-7) **Matters of discretion are restricted to:** 1. the matters of discretion listed in any of the standards GRUZ-S2, GRUZ-S3, GRUZ-S4, GUZ-S5, GRUZ-S6, GRUZ-S7 and/or GRUZ-S9 that are not complied with. ***Notification**: Any application made under RDIS-1 is precluded from being publicly notified.*

SPZMM-R2	Prospecting	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted**	**Activity status when compliance is not achieved: Not Applicable**

SPZMM-R3	Exploration	
Special Purpose Zone - Macraes Mining -Existing Mining Area	**Activity status: Permitted**	**Activity status when compliance is not achieved: Not Applicable**

SPZMM-R4	Primary production activities (excluding carbon forestry ~~otherwise provided for in SPZMM-R17~~, mining activity, quarrying activities, intensive indoor primary production and intensive outdoor primary production)	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted** *Note: The Resource Management Act (National Environmental Standards for Commercial Forestry) Amendment Regulations 2023 also apply to commercial forestry.*	**Activity status when compliance is not achieved: Not Applicable**

SPZMM-R5	Amenity planting and shelterbelts	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted** **Where:** PER-1 The amenity planting or shelterbelt does not involve planting of species that are, or can become pest species as identified in any Regional Pest Management Plan; **and** PER-2 The amenity planting will not shade any existing adjoining residential unit between the hours of 9:00am and 4:00pm, or any formed public road between 10:00am and 2:00pm, on the shortest day	**Activity status when compliance is not achieved: Discretionary** **Where:** DIS-1 Compliance is not achieved with PER-1, PER-2, ~~PER-3~~ and/or PER-~~4~~-3

	of the year; **and** PER-3 The width of the shelterbelt does not exceed 30m; ~~**and**~~ ~~PER-4~~ ~~No exotic amenity planting shall take place within the Skink Habitat/Management Area as shown on the planning maps.~~	

SPZMM-R6	**Residential activity**	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted**	**Activity status when compliance is not achieved: Not Applicable**

SPZMM-R7	**Residential unit**	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted** **Where:** PER-1 The standard GRUZ-S1 Residential site density is complied with.	**Activity status when compliance is not achieved: Non-complying** **Where:** NC-1 Compliance is not achieved with PER-1

SPZMM-R8	**Accessory building**	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted**	**Activity status when compliance is not achieved: Not Applicable**

SPZMM-R9	**Minor residential unit**	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted** **Where:** PER-1 The gross floor area of the minor residential unit shall be no more than 100m^2, excluding any garaging; **and** PER-2 There shall be only one minor residential unit per site**;** **and** PER-3 The minor residential unit shares an existing formed vehicle crossing that is used by the principal residential unit on the site.	**Activity status when compliance is not achieved: Restricted Discretionary** **Where:** RDIS-1 Compliance is not achieved with PER-1 **Matters of discretion are restricted to:** 1. whether the minor residential unit fits within its context, taking into account: a. the location, size and visual appearance of the minor residential unit so that it appears from the road, or any other public place, as an integrated ancillary activity to the principal dwelling. ***Notification****: Any application made under RDIS-1 is precluded from being publicly notified.* **Activity status when compliance is not achieved: Discretionary** **Where:** DIS-1 Compliance is not achieved with PER-2 and/or PER-3

~~**SPZMM-R10**~~	~~**Visitor accommodation**~~	
~~**Special**~~	~~**Activity status: Permitted**~~	~~**Activity status when compliance is not achieved:**~~

~~**Purpose Zone - Macraes Mining**~~	~~**Where:**~~ ~~PER-1~~ ~~The visitor accommodation is limited to homestays accommodating no more than 5 visitors at any one time; **and**~~ ~~PER-2~~ ~~The site continues to be used for farming or residential purposes; **and**~~ ~~PER-3~~ ~~The activity is principally carried out within a residential unit, or accessory building to a residential unit or primary production activity (excluding mining, quarrying or forestry).~~	~~**Discretionary**~~ ~~**Where:**~~ ~~DIS-1~~ ~~Compliance is not achieved with PER-1, PER-2 and/or PER-3~~

SPZMM-R11	**Home business (excluding primary production activity)**	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted** **Where:** PER-1 No more than 40m^2 of the gross floor area of all buildings on the site is used for the home business; **and** PER-2 No more than one full time employee, or equivalent, engaged in the home business, resides off-site; **and** PER-3 No more than 2 heavy vehicle movements, and a total of 20 vehicle movements are generated in a 24 hour period for the home business; **and** PER-4 Any on-site storage of materials associated with the home business is undertaken within buildings on the site; **and** PER-5 The manufacturing, altering, repairing, dismantling or processing of any goods, or articles associated with the home business, take place within a building.	**Activity status when compliance is not achieved: Discretionary** **Where:** DIS-1 Compliance is not achieved with PER-1, PER-2, PER-3, PER-4, and/or PER-5

SPZMM-R12	**Intensive indoor primary production and intensive outdoor primary production**	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted** **Where:** PER-1 1. there are no more than 50 sows and no more than 500 pigs of mixed ages; and 2. no more than 10 outdoor, free-range pigs per hectare and their progeny up to weaner stage; **and**	**Activity status when compliance is not achieved: Discretionary** **Where:** DIS-1 Compliance is not achieved with PER-1 **Activity status when compliance is not achieved: Non-Complying**

	PER-2 1. housed pigs are located no closer than 500m to a property boundary; and 2. no disposal or storage of effluent within 500m of a residential unit on any other site; and 3. no intensive indoor primary production or intensive outdoor primary production of pigs occurs within 2 kilometres of a Residential, Settlement or Open Space zone; **or** PER-3 1. no intensive indoor primary production or intensive outdoor primary production of poultry takes place within 100m of a property boundary; and 2. no disposal or storage of effluent within 500m of a residential unit on any other site; and 3. no intensive indoor primary production or intensive outdoor primary production of poultry occurs within 2 kilometres of a Residential, Settlement or Open Space Zone; **or** PER-4 For intensive indoor primary production or intensive outdoor primary production of any other species, there is: 1. no disposal or storage of effluent within 500m of a residential unit on any other site; and 2. a setback of at least 2 kilometres from a Residential, Settlement or Open Space Zone.	**Where:** NC-1 Compliance is not achieved with PER-2, PER-3 and/or PER-4
Note: A Regional Council consent may be required for discharge to land or waterbodies, or to air.		

~~SPZMM-R13~~	~~Recreational activity~~	
~~Special Purpose Zone - Macraes Mining~~	~~Activity status: Permitted~~	~~Activity status when compliance is not achieved: Not applicable~~

SPZMM-R14	Conservation activities	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted**	**Activity status when compliance is not achieved: Not applicable**

SPZMM-R15	Commercial activity	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted** **Where:** PER-1 Retail sales are limited to: 1. farming produce (including milk, fruit, vegetables, plants, flowers, or eggs) produced on the site, or honey processed on the site; or 2. refreshments served to group visits to sites used for primary production or residential activities; or	**Activity status when compliance is not achieved: Discretionary** **Where:** DIS-1 Compliance is not achieved with PER-1

	3. handcrafts produced on the site.	

SPZMM-R16	Aeroplane airstrips and helicopter landing areas, and the use of these by aircraft	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted** **Where:** PER-1 The use is solely for the purpose of primary production activities, exploration, prospecting, or conservation activities; **or** PER-2 The use is solely for the purposes of biosecurity or biodiversity control authorised by a statutory agency; **or** PER-3 The use of the landing area or airstrip is for any other activity which results in no more than 8 aircraft movements per week (4 takeoffs and 4 landings); **or** PER-4 Use for emergency landings, rescues, and firefighting; **and** PER-5 In relation to both PER-1 and PER-2, no flight path is over a Residential Zone, Rural Lifestyle Zone, or Settlement Zone. *Note: Any helicopter landing area or airstrip is required to meet any relevant noise limits set out in the Noise Chapter.*	**Activity status when compliance is not achieved: Discretionary** **Where:** DIS-1 Compliance is not achieved with PER-1, PER-2, PER-3, PER-4, and/or PER-5

SPZMM-R17	Carbon forestry	
Special Purpose Zone - Macraes Mining	**Activity status: Permitted** **Where:** PER-1 The species of planting are indigenous to the ecological district in which the activity is to take place; **and** PER-2 ~~The activity does not take place within an area identified as highly productive land on the planning maps; **and**~~ PER-3 Afforestation must not occur where a carbon forest tree, when fully grown, could shade a public road between 10:00am and 2:00pm on the shortest day of the year, except where the topography already causes shading; **and** PER-4 Afforestation must not occur— 1. Within 20m of the boundary of an adjoining property; or 2. except in the case of a dwelling located on the same property as the proposed carbon forestry is to be afforested, within the greater of; a. 40m of a dwelling; or b. a distance where the forest species when fully grown would shade a	**Activity status when compliance is not achieved: Discretionary** **Where:** DIS-1 Compliance is not achieved with PER-1; **and** DIS-2 ~~Where the activity involves non-indigenous species, the carbon forestry activity does not take place:~~ 1. ~~within a Rural Scenic Landscape or sensitive environment.~~ DIS-3 Compliance is not achieved with PER-3 and/or PER-6 **Activity status when compliance is not achieved: Non-Complying** **Where:** NC-1 Compliance is not achieved with PER~~-2 and/or PER~~-4 **Activity status when compliance is not achieved: Prohibited** **Where:** PRO-1 Compliance is not achieved with PER-5~~ and/or DIS-2.~~

	dwelling between 10:00am and 2:00pm on the shortest day of the year, except where topography already causes shading; or 3. within 30m of the boundary of land used for papakāika purposes or a Residential, Settlement or Open Space Zone; ~~or~~**and** 4. ~~within 10m of a Significant Natural Area; **and**~~ PER-5 The carbon forestry activity does not involve the planting of any pest, pest agent, or organism of interest identified in the relevant Regional Pest Management Plan; **and** PER-6 The carbon forestry utilises no more than 50% of any site. *Note: The Resource Management Act (National Environmental Standards for Commercial Forestry) Amendment Regulations 2023 also apply to exotic continuous-cover forestry.*	

CONTROLLED ACTIVITIES

SPZMM-R18	**Exploration**	
Special Purpose Zone — Macraes Mining - Potential Mining Area	**Activity status: Controlled** **Matters of control are restricted to:** 1. the duration, timing, frequency, extent and staging of works; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance; and 4. siting of tracks, parking areas, buildings or other equipment; and 5. adverse effects related to landscape, natural features, natural character, cultural values, historic heritage and indigenous biodiversity; and 6. the matters addressed in the content of the rehabilitation plan. *Note: Section 88 Information Requirements for Applications:* *Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan.*	**Activity status when compliance is not achieved: Not Applicable**

SPZMM-R19	**Mining activities**

Special Purpose Zone — Macraes Mining - Existing Mining Area	**Activity status: Controlled** **Matters of control are restricted to:** 1. the duration, timing, frequency, extent and staging of works; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and 4. siting of buildings, infrastructure, or other equipment, including plant required to process minerals; and 5. landscaping treatment, including the shaping of the pits and pit margins, the siting and shaping of waste rock stacks and embankments, tailings impoundments, any other dams and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and private tracks; and 7. measures to maintain indigenous biodiversity; ~~and~~ 8. the matters addressed in the content of the rehabilitation plan~~.~~; and 9. measures to avoid, mitigate, offset or compensate adverse effects on the values of sensitive environments and on cultural values. *Note: Section 88 Information Requirements for Applications:* *Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan.*	**Activity status when compliance is not achieved: Not Applicable**

RESTRICTED DISCRETIONARY ACTIVITIES

SPZMM-R20	**Mining Activities**

Special Purpose Zone - Macraes Mining — Potential Mining Area	**Activity status: Restricted Discretionary** **Matters of discretion are restricted to:** 1. the duration, extent, location and staging of the excavation and construction of pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads, buildings and tracks associated with mining; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and 4. the location of plant used to process any mineral; and 5. landscaping treatment, including the siting and shaping of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and tracks; and 7. adverse effects on, and measures to maintain indigenous biodiversity, landscape, natural features, natural character, heritage and cultural values; and 8. the regional and national benefits associated with the mineral extraction; and 9. any biodiversity offsetting or biodiversity compensation provided by the applicant in accordance with the biodiversity effects management hierarchy; and 10. the matters addressed in the content of the rehabilitation plan. *Note: Section 88 Information Requirements for Applications:* *Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan.*	**Activity status when compliance is not achieved: Not Applicable**

SPZMM-R21	**Rural Industry not associated with mining**	
Special Purpose Zone - Macraes Mining	**Activity status: Restricted Discretionary** **Where:** PER-1 The activity is not a potentially high-impact industrial activity.	**Activity status when compliance is not achieved: Discretionary** **Where:** DIS-1 Compliance is not achieved with PER-1

	Matters of discretion are restricted to: 1. the suitability of the location, site design and layout; and 2. the intensity and scale of the activity; and 3. the extent of adverse effects on existing or permitted activities; and 4. the extent of adverse effects on the safe and efficient operation of the road network, and suitability of onsite loading, manoeuvring and access; ~~and~~ 5. the provision of infrastructure to service the activity ~~.~~; and 6. adverse effects on the values of sensitive environments and on cultural values.	

DISCRETIONARY ACTIVITIES

SPZMM-R22	**Any other activity not provided for as a permitted, controlled, restricted discretionary, discretionary or non-complying activity**	
Special Purpose Zone - Macraes Mining	**Activity status: Discretionary**	**Activity status when compliance is not achieved: Not Applicable**

NON-COMPLYING ACTIVITIES

SPZMM-R23	**Retirement village**	
Special Purpose Zone - Macraes Mining	**Activity status: Non-Complying**	**Activity status when compliance is not achieved: Not Applicable**

SPZMM-R24	**Educational facility**	
Special Purpose Zone - Macraes Mining	**Activity status: Non-Complying**	**Activity status when compliance is not achieved: Not Applicable**

Appendix 2

Recommended Responses to Submissions

*****THIS TABLE DOES NOT INCLUDE ALL POINTS ALLOCATED FROM OTHER CHAPTERS YET*****

*****DO NOT APPLY TABLE TEXT STYLE AS IT REMOVES UNDERLINE AND STRIKETHROUGH*****

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Reallocated General Submissions

The submissions in this table were first considered in reporting for Stream 1 on General Submissions. These points were recommended for reallocation to all future s42A reports for consideration by each author in relation to each report topic. Recommendations given on these points here are in relation to this report only, and final overarching recommendations are intended to be given by the reporting author for the final mop-up hearing. Background information on the initial analysis of the submission points in this table is available in the General Submissions Opening Statement and Interim Reply Report, available online. There are no further submissions on these points.

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
176.2	Terramark Limited	General	General	Support	Supports in part as many rules do not include any link or relationship to an objective or policy.	Seeks that the Council incorporates objectives and policies to support proposed rules set out in the PDP that provide clear direction to consent applicants and decision-makers.	Reject
246.2	Federated Farmers of New Zealand Incorporated	General	General	Support	Consider that many Proposed District Plan chapters lack a coherent policy framework to justify the rules they contain, making it difficult for applicants and decision-makers to understand how rules implement objectives. The submission highlights missing supporting policies across multiple chapters, noting that these gaps undermine public understanding and meaningful participation in the planning process. [See original submission for submission]	Seek that the Council ensures there are policies to support proposed rules set out in the PDP, which provide clear direction to consent applicants and decision-makers. New individual submissions requesting new policy direction in relation to the SASM, NFL, SUB, GRUZ chapters, and GRUZ-P7 are provided	Reject
246.1	Federated Farmers of New Zealand Incorporated	General	General	Support	Consider that the Proposed District Plan should clearly identify the specific resource management issues affecting the Waitaki District to ensure policies are well-targeted and justified. It highlights that current issue statements—such as for stormwater—lack depth and should better describe underlying causes and impacts to support effective planning. [see original submission for full submission]	Seek clearly identified significant resource management issues that the objectives, policies and rules of the PDP seek to address, as relevant to the Waitaki District, in some or all of the following locations: 1. in the Description of the District chapter. 2. in the Strategic Direction chapter. 3. as provisions in each chapter or section, expressed before the objectives. 4. the Introductory text for each chapter. 5. any other part of the PDP that is relevant.	Reject
246.7	Federated Farmers of New Zealand Incorporated	General	General	Support	Consider that the Proposed District Plan is overly long and complex, forcing users to navigate numerous objectives, policies, and rules across multiple chapters even for minor activities. They warn that this complexity reduces usability, discourages participation, increases the risk of accidental non-compliance, and raises costs by making professional planning advice more necessary.	Seek that the Council amend the PDP to: 1. reduce the number of provisions within chapters – objectives, policies and rules –by combining those provisions with similar themes. 2. use clear, simple language. 3. remove unnecessary duplication. 4. provide clearer and simpler cross-referencing between chapters and provisions.	Reject

General Submissions

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
295.47	OceanaGold (New Zealand) Limited	General Approach	Part 2 – District wide matters	Amend	Supports the Plan's alignment with the National Planning Standards but recommends that the SPZMM is a standalone chapter to ensure clarity and avoid conflicts with district-wide provisions.	Seeks to clairfy in the framework of the Plan that the SPZMM is a stand alone chapter of the Plan.	Reject
295.218	OceanaGold (New Zealand) Limited	Earthworks	General	Oppose	Considers that all activities within the SPZMM should be managed in a standalone chapter, separate from the General Earthworks provisions. Considers that the current drafting creates uncertainty around which rules apply to exploration and prospecting, and it is inappropriate for these activities to default to the Earthworks chapter.	Seeks to ensure that the chapter does not apply to any activities in the SPZMM.	Reject
295.222	OceanaGold (New Zealand) Limited	Noise	General	Oppose	Considers that all activities within the SPZMM should be managed in a standalone chapter, separate from the NOISE provisions.	Seeks to ensure that the chapter does not apply to any activities in the SPZMM.	Reject

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
295.84	OceanaGold (New Zealand) Limited	Strategic Direction	General	Amend	Considers that clear recognition should be made of the Hyde-Macraes Shear Zone in the Strategic Direction chapter to support the SPZMM through a new objective enabling mineral extraction, reflecting the area's significant economic contribution.	Seeks to add the following new objective:: To recognise the Hyde-Macraes Shear Zone as a significant mineral resource, thereby enhancing the social and economic well-being of the community.	Reject
295.85	OceanaGold (New Zealand) Limited	Strategic Direction	General	Amend	Considers that clear recognition should be made of the Hyde-Macraes Shear Zone in the Strategic Direction chapter to support the SPZMM through a new objective enabling mineral extraction, reflecting the area's significant economic contribution.	Seeks to add the following new objective: To enable mineral extraction and ancillary activities which support it, including specifically within the Special Purpose Zone – Macraes Mining.	Reject

Definitions

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
310.2	Graymont (NZ) Limited	Definitions	Biodiversity compensation Has the same meaning as in the National Policy Statement on In	Support	Supports retaining definitions for 'Biodiversity Compensation', 'Biodiversity Effects Management Hierarchy', and 'Biodiversity Offset' as per the NPS-IB.	Seeks to retain as notified.	Accept
310.3	Graymont (NZ) Limited	Definitions	Biodiversity effects management hierarchy Has the same meaning as in the National Policy	Support	Supports retaining definitions for 'Biodiversity Compensation', 'Biodiversity Effects Management Hierarchy', and 'Biodiversity Offset' as per the NPS-IB.	Seeks to retain as notified.	Accept
295.50	OceanaGold (New Zealand) Limited	Definitions	Biodiversity offset has the same meaning as in the National Policy Statement on Indigeno	Support	Supports this definition and its inclusion in policies and rules.	Seeks to retain as notified.	Accept
310.4	Graymont (NZ) Limited	Definitions	Biodiversity offset has the same meaning as in the National Policy Statement on Indigeno	Support	Supports retaining definitions for 'Biodiversity Compensation', 'Biodiversity Effects Management Hierarchy', and 'Biodiversity Offset' as per the NPS-IB.	Seeks to retain as notified.	Accept
194.10	Director-General of Conservation	Definitions	Ecological district has the same meaning as in the National Policy Statement on Indigeno	Support	Considers that this definition is appropriate, but it would assist Plan users if a map showing ecological districts was included, either as a link or in the E-Plan maps.	Seeks that a map showing the ecological districts is added.	Reject
295.52	OceanaGold (New Zealand) Limited	Definitions	Existing Mining Area means land within the Special Purpose Zone Macraes Mining that has	Amend	Supports identifying areas in the SPZMM with existing approvals or permitted mining activities, and seeks to ensure this includes undeveloped areas with opriate approvals and that the defined area can expand as new lawful and/or consented mining activities occur.	Seeks to amend as follows: means land within the Special Purpose Zone Macraes Mining that has either received a resource consent (previous or current) for mining-related proposals ~~or and~~ has been the subject of disturbance during the excavation of pits, the construction of waste rock stacks, the construction of haul roads and other tracks, the construction of gold processing plant as well as other ancillary infrastructure and underground mining.	Reject
295.53	OceanaGold (New Zealand) Limited	Definitions	Exploration has the same meaning as in the Crown Minerals Act, 1991 (as set out below):	Support	Supports the definition as it appropriately provides for exploration activities.	Seeks to retain as notified.	Accept
310.7	Graymont (NZ) Limited	Definitions	Exploration has the same meaning as in the Crown Minerals Act, 1991 (as set out below):	Support	Supports including the definition of "exploration" as per the Crown Minerals Act 1991.	Seeks to retain as notified.	Accept

243.2	Whitestone Contracting Limited	Definitions	Indigenous biodiversity has the same meaning as in the National Policy Statement on Indi	Support	Support definitions from NPSIB being carried over for consistency.	Retain as notified.	Accept
265.19	Geoff and Katrina Taylor	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Oppose	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
267.19	Kelvin and Debbie Weir	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
269.19	Brenda & Ken McLeod	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
282.19	Dogterom Thomson Ltd	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
283.19	Dogterom Hohepa Ltd	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
284.19	Dogterom Duntroon Ltd	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
285.19	Barry and Anne Matthews	Definitions	Mineral means a naturally occurring inorganic	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all	Reject

			substance beneath or at the surface of the		with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	
290.19	Philip and Becky Wilson	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
291.19	Peter and Janine Stackhouse	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones~~, and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
292.19	Robert and Sylvia Borst	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones~~, and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
293.19	Brock and Gemma Hamilton	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones~~, and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
295.62	OceanaGold (New Zealand) Limited	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition of mineral.	Seeks to retain as notified.	Accept, with amendment to recognise definition in Crown Minerals Act 1991 under Schedule 1 Clause 16(2).
296.19	Gavin Simpson	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
297.19	Parkside Holdings Ltd	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	The definition of 'mineral' includes the excavation of 'industrial rocks' and 'building stone', neither of which are defined but both would be better understood to be quarried.	remove *industrial rocks* and *building stone* from the definition	Reject
298.19	Alastair and Carrie Gibson	Definitions	Mineral means a naturally occurring inorganic	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that	Seeks to amend as follows:	Reject

			substance beneath or at the surface of the		are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	
299.19	Twin Terraces Ltd & Cayuga Ltd	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried. Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
300.19	Adrianus and Francisca Verbakel & others	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried. Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend the definition as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
301.19	Carolyn Thelning	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
302.19	Peter and Sandra Mitchell	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones~~, and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
303.19	Terry and Fiona Conlan	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
304.19	Kirsty and Nathan McLachlan	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition but considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
310.13	Graymont (NZ) Limited	Definitions	Mineral means a naturally occurring inorganic	Support	Supports including the definition of "mineral" as per the Crown Minerals Act 1991.	Seeks to retain as notified.	Accept, with amendment to recognise definition in Crown Minerals Act 1991 under Schedule 1 Clause 16(2).

			substance beneath or at the surface of the				
312.27	Springbank	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Amend	Opposes in part The submitters considers the term 'industrial rock' to not be a commonly recognised term, that and 'building stone' are undefined in the PDP yet present in the definition for mineral while more accurately understood as quarried products. The definition of *mineral* feeds into the definition of *mining activities*, yet there are no objectives, policies, or rules that safeguard existing mining operations. Consider "industrial rock" and "building stone" could fall under the NPS terms "rock," "quarry," and "quarrying," the submitters suggest refinement of plan terminology.	Seeking removal of 'industrial rocks' and 'building stone' from the definition for 'mineral.' as follows: Mineral means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
313.331	Geoff & Jan Keeling - Keeling Dairies Limited	Definitions	Mineral means a naturally occurring inorganic substance beneath or at the surface of the	Support	Supports the definition with modification. Considers the terms 'industrial rocks' and 'building stone' is problematic because neither term is defined, and both are commonly understood as materials that are quarried (not mined). Considers this could be better aligned with the NPS definitions for 'Quarry' and 'Quarrying', which use the broader term 'rock'. Also considers that the definition of mineral is used to define 'mining activities', yet there are no objectives, policies, or rules in the plan to protect existing mining operations.	Seeks to amend as follows: means a naturally occurring inorganic substance beneath or at the surface of the earth, whether or not under water; and includes all metallic minerals, non-metallic minerals, fuel minerals, precious stones, ~~industrial rocks and building stones,~~ and a prescribed substance within the meaning of the Atomic Energy Act 1945	Reject
271.34	Canterbury Regional Council	Definitions	Mining activities means the use of land and buildings and associated infrastructure for	Support	Generally, supports the 'Mining activities' Definition. The RMA uses the Crown Minerals Act definition of "mining" That doesn't seem as good as the proposed definition – in any case the definition relates to the Macraes Flat area that is outside the Canterbury Region. [Inferred as specific reasons not given]	Retain the 'Mining activities' Definition as notified.	Accept in part, except as amended by submission point 295.63
295.63	OceanaGold (New Zealand) Limited	Definitions	Mining activities means the use of land and buildings and associated infrastructure for	Amend	Supports the definition of 'mining activities' but recommends expanding it to clearly include transport, infrastructure maintenance, upgrades, and mine closure activities.	Seeks to amend as follows: means the use of land and buildings and associated infrastructure for the primary purpose of the extraction, winning, excavation, taking, <u>transport</u> and ~~associated~~ processing of minerals and any ancillary activity related to mining including <u>maintenance and upgrading of mining related infrastructure,</u> the deposition of overburden material in waste rock stacks, rehabilitation <u>and mine closure activities</u>, landscaping and cleanfill and the use of land and accessory buildings associated with the operation of the mine, but does not include prospecting and exploration and quarrying activities.	Accept
310.14	Graymont (NZ) Limited	Definitions	Mining activities means the use of land and buildings and associated infrastructure for	Amend	Supports including the definition of "mining activities" but requests consistency in the use of "mining" and "mining activities" in the plan.	Seeks to retain as notified and seeks consistency in terminology throughout the PDP, or that a definition for mining is included in accordance with the Crown Minerals Act 1991.	Accept in part, with modifications made to the definition as sought by submission point 295.63.
295.65	OceanaGold (New Zealand) Limited	Definitions	Potential Mining Area means land within the Special Purpose Zone - Macraes Mining that h	Amend	Supports the inclusion of Potential Mining Areas in the SPZMM but seeks to ensure they aren't restricted by overlays or conflicting provisions, and that the definition clearly distinguishes them from Existing Mining Areas, together covering the full zone.	Seeks to amend as follows: means land within the Special Purpose Zone - Macraes Mining that has not been mined or subject to any mining related disturbance and does not have a <u>resource</u> consent for a mining-related activity. <u>Potential Mining Area includes all land within the Special Purpose Zone – Macraes Mining that is not an Existing Mining Area</u> Also seeks to ensure that these areas are not unduly fettered with other overlays or planning provisions which either directly or inadvertently restrict mining activities from developing there in the future.	Accept in part
295.67	OceanaGold (New Zealand) Limited	Definitions	Prospecting has the same meaning as in the Crown Minerals Act, 1991: means any activi	Support	Supports the definition as it is consistent with the definition set out in the CMA.	Seeks to retain as notified.	Accept

310.18	Graymont (NZ) Limited	Definitions	Prospecting has the same meaning as in the Crown Minerals Act, 1991: means any activi	Support	Supports including the definition of "prospecting" as per the Crown Minerals Act 1991.	Seeks to retain as notified.	Accept
170.8	Aggregate and Quarry Association	Definitions	Quarry NPS means a location or area used for the permanent removal and extraction of a	Support	Considers that the Definitions of 'Quarry' and 'Quarrying Activities' are supported which are taken from the NPS and should be retained as proposed.	Seeks to retain as notified. [inferred relief requested].	Accept
295.68	OceanaGold (New Zealand) Limited	Definitions	Quarry NPS means a location or area used for the permanent removal and extraction of a	Support	Supports the definition - no specific reasons given.	Seeks to retain as notified.	Accept
310.19	Graymont (NZ) Limited	Definitions	Quarry NPS means a location or area used for the permanent removal and extraction of a	Support	Supports including the definition of "quarry" as per the National Planning Standards.	Seeks to retain as notified.	Accept
170.9	Aggregate and Quarry Association	Definitions	Quarrying activity NPS means the extraction, processing (including crushing, screening	Support	Supports the definition as it aligns with the NPS and works well for the quarrying sector as they encompass the wide range of activities involved with quarrying which are broader than just aggregate extraction.	Seeks to retain as notified.	Accept
295.69	OceanaGold (New Zealand) Limited	Definitions	Quarrying activity NPS means the extraction, processing (including crushing, screening	Support	Supports the definition of quarrying activities as it considers it to be appropriately comprehensive.	Seeks to retain as notified.	Accept
310.20	Graymont (NZ) Limited	Definitions	Quarrying activity NPS means the extraction, processing (including crushing, screening	Amend	Suuports the definition for "quarrying activities" but considers there is inconsistency in the PDP use of 'quarrying' and 'quarrying activities', and highlights the absence of a definition for "regionally significant industry", which they consider should be added. The submitter considers that its Makareao plant qualifies as regionally significant industry due to its substantial contributions to the regional and national economy, supplying essential lime and limestone products for a wide range of uses across the South Island.	Seeks to add the following definition: Regionally Significant Industry means an industrial activity based on the use of natural and physical resources in the region which has been shown to have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits.	Reject
166.10	Horticulture New Zealand	Definitions	Rural industry NPS means an industry or business undertaken in a rural environment tha	Support	Supports as consistent with National Planning Standards.	Retain as notified.	Accept
246.37	Federated Farmers of New Zealand Incorporated	Definitions	Rural industry NPS means an industry or business undertaken in a rural environment tha	Support	Support the definition	Retain as notified	Accept
305.15	Erin Nivonne Schultz	Definitions	Rural industry NPS means an industry or business undertaken in a rural environment tha	Support	Supports the Rural industry definition being undertaken in a rural environment that directly supports, services, or is dependent upon primary production.	Retain	Accept
306.15	Waitaki Property Guardians Incorporated	Definitions	Rural industry NPS means an industry or business undertaken in a rural environment tha	Support	Supports the Rural industry definition being undertaken in a rural environment that directly supports, services, or is dependent upon primary production.	Retain the definition.	Accept
194.16	Director-General of Conservation	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Support	Seeks a definition to capture the full range of potential activities that result in 'Vegetation clearance'. However, it is unclear why the application of water is constrained in a way that doesn't apply to any other elements of the definition.	Amend sub-clause 8. 'Vegetation clearance' as follows (or words to similar effect): "the deliberate application of water, fertiliser or oversowing ~~where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, including dryland cushionfield species~~;	Reject. It is recommended that this definition is deemed out of scope for the district plan review.

212.18	Glenbrook Station	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers the definition of “vegetation clearance” inappropriate due to inclusion of undefined “mob stocking.” The submitter considers the clause unreasonable because landowners cannot control whether stock will mob feed on vegetation.	Seeks to delete clause (10). [inferred relief]	Reject. Refer to submission point 194.16.
240.14	Environmental Defence Society Incorporated (EDS)	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Support	Considers the vegetation clearance definition incomplete and seeks inclusion of shading and edge effects, along with clarification of activity relationships.	Seeks to include shading and edge effects in the definition. Seeks to amend clause (8) as follows: the deliberate application of water, fertiliser or oversowing ~~where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, including dryland cushionfield species~~	Reject. Refer to submission point 194.16.
246.41	Federated Farmers of New Zealand Incorporated	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Support	Seeks amendments so that the definition excludes land used for cultivation, as cultivation involves land disturbance, oversowing, irrigation, and fertiliser application and should not be captured. The submitter also seeks allowance for incidental harm to non-target species during pest plant control and considers the definition could be simplified by removing unnecessary examples and excluding de minimis activities such as walking, sampling, or natural events.	Consider redrafting this definition to be more streamlined, for example: (a) means the damage, destruction or removal of indigenous vegetation by any means (for example, by cutting, crushing, application of chemicals, or burning); and (b) includes activities that result in the damage, destruction, or removal of vegetation (for example, over-planting or draining away water); and (c) other than on land used for cultivation, includes: (i) deliberate application of water, fertiliser, oversowing, that change ecological conditions for the resident indigenous plants, and (ii) mob-stocking; and (d) for any land, does not include incidental loss from: (i). maintenance of improved pasture or grazing of land as part of established farming practice within a site; or (ii). weed or pest plant control. Or amendment as follows: means the removal, trimming, felling, or modification of any indigenous vegetation or the deliberate alteration of hydrological functions that support indigenous vegetation. It includes: 1. cutting; 2. crushing; ~~3. cultivation;~~ 4. over-planting; ~~5. soil disturbance including direct drilling;~~ 6. application of chemicals including herbicide; 7. burning; 8. the deliberate application of water, fertiliser or oversowing on land that is not used for cultivation, where it would change the ecological conditions ~~such that the~~ for resident indigenous plant(s)~~are killed by competitive exclusion, including dryland cushion field species;~~ ~~9. the drainage of wetlands or lakes;~~ 10. mob-stocking; and 11. applying seed of exotic pasture on land that is not used for cultivation. It does not include incidental loss from: a.maintenance of improved pasture or grazing of land as part of established farming practice within a site; or	Reject. Refer to submission point 194.16.

						~~b. walking;~~ ~~c. sampling or undertaking studies;~~ ~~d. natural hazards~~ b. weed or pest plant control.	
256.4	Fish and Game (Otago and Central South Island Fish and Game Councils)	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Amend	Including wetland or lake drainage within the definition of vegetation clearance may conflict with NES-FW requirements, as permitted clearance rules could contravene NES-FW obligations	Remove the drainage of wetlands or lakes from the definition of Vegetation clearance.	Reject. Refer to submission point 194.16.
265.18	Geoff and Katrina Taylor	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	Reject. Refer to submission point 194.16.
267.18	Kelvin and Debbie Weir	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide;	Reject. Refer to submission point 194.16.

					under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	
269.18	Brenda & Ken McLeod	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	Reject. Refer to submission point 194.16.
271.61	Canterbury Regional Council	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Support	Generally, supports the 'Vegetation clearance' Definition as excluding routine works for existing activities. [Inferred submission summary]	Retain the 'Vegetation clearance' Definition as notified	Reject. Refer to submission point 194.16.
282.18	Dogterom Thomson Ltd	Definitions	Vegetation clearance means the removal,	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological	Seeks to amend as follows:	Reject. Refer to submission point 194.16.

			trimming, felling, or modification of any indige		balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	
283.18	Dogterom Hohepa Ltd	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from:	Reject. Refer to submission point 194.16.

						a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	
284.18	Dogterom Duntroon Ltd	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	Reject. Refer to submission point 194.16.
285.18	Barry and Anne Matthews	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide; 7. burning;	Reject. Refer to submission point 194.16.

					access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	
290.18	Philip and Becky Wilson	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~harmful substances including herbicide; 7. burning; 8.~~the deliberate~~application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	Reject. Refer to submission point 194.16.
291.18	Peter and Janine Stackhouse	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield[clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory,	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting;	Reject. Refer to submission point 194.16.

					as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~harmful substances including herbicide; 7. burning; 8.~~the deliberate~~application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion,~~ including dryland cushionfield species;~~ 9.~~the~~drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	
292.18	Robert and Sylvia Borst	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~harmful substances including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	Reject. Refer to submission point 194.16.

293.18	Brock and Gemma Hamilton	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield[clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as of 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide;7. burning;8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~9.~~the~~ drainage of mapped wetlands or lakes;~~10. mob-stocking; and~~11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site~~; b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	Reject. Refer to submission point 194.16.
295.76	OceanaGold (New Zealand) Limited	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Amend	Considers the definition should be amended to focus only on indigenous vegetation and clarify that hydrological changes, like water diversion or abstraction, don't always equate to vegetation clearance, especially in the SPZMM.	Seeks to amend as follows: Indigenous Vegetation Clearance means the removal, trimming, felling, or modification of ~~any~~ indigenous vegetation ~~or the deliberate alteration of hydrological functions that support indigenous vegetation~~. ...	Reject. Refer to submission point 194.16.
296.18	Gavin Simpson	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield[clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation establishedasat1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~	Reject. Refer to submission point 194.16.

						11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	
297.18	Parkside Holdings Ltd	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	term *chemicals* is too broad define established farming activities (see below) phrase around dryland cushionfield species is confusing (delete or amend) remove reference to mob stocking as grazing can support IB	Vegetation clearance means the deliberate removal,trimming, felling, or modification of any indigenous vegetationestablished as at 1st March 2025 or the deliberate alterationof hydrological functions that support that indigenousvegetation. It includes deliberate: ... 8. the deliberate application of water, fertiliser or oversowing where itwould change the ecological conditions such that the residentindigenous plant(s) are killed by competitive exclusion, ~~includingdryland cushionfield species;~~ 9. ~~the~~ drainage of mapped wetlands or lakes; 10. ~~mob-stocking; and~~ 11. applying seed of exotic pasture.It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ .... e. non-commercial harvesting of firewood	Reject. Refer to submission point 194.16.
298.18	Alastair and Carrie Gibson	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking;	Reject. Refer to submission point 194.16.

						c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	
299.18	Twin Terraces Ltd & Cayuga Ltd	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Opposes in part the definition of Vegetation clearance for the following reasons [Refer to original submission for full reasons]: The term "chemical" is too broad; beneficial substances may be captured unnecessarily. Requirements relating to hydrological balance are impractical due to lack of baseline information. Several listed activities can occur naturally or accidentally and should not be classed as vegetation clearance. The reference to dryland cushionfield species is unclear. Including mob-stocking is inconsistent with grazing being excluded, and the term is undefined. Established farming practice is not defined, creating uncertainty. Wetlands are not defined in the district plan despite being regionally mapped. Overly restrictive rules may discourage indigenous planting and create economic disincentives. Some non-threatened indigenous species (e.g., manuka) provide useful community resources such as firewood.	Amend the definition to: Clarify or remove the reference to dryland cushionfield species. Remove or clearly define mob-stocking, or replace with pugging. Define established farming practice as 'primary production activities established before 1st March 2025'. Suggested amendment as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of chemicals including herbicide; 7. burning; 8.~~the deliberate~~application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion~~, including dryland cushionfield species;~~ 9.~~the~~drainage ofmappedwetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site~~; b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood [Refer to original submission for full relief sought]	Reject. Refer to submission point 194.16.
300.18	Adrianus and Francisca Verbakel & others	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Opposes in part the definition of Vegetation clearance for the following reasons [Refer to original submission for full reasons]: The term "chemical" is too broad; beneficial substances may be captured unnecessarily. Requirements relating to hydrological balance are impractical due to lack of baseline information. Several listed activities can occur naturally or accidentally and should not be classed as vegetation clearance. The reference to dryland cushionfield species is unclear. Including mob-stocking is inconsistent with grazing being excluded, and the term is undefined. Established farming practice is not defined, creating uncertainty.	Amend the definition to [Refer to original submission for full relief]: Clarify or remove the reference to dryland cushionfield species. Remove or clearly define mob-stocking, or replace with pugging. Define established farming practice as 'primary production activities established before 1st March 2025'. Suggested amendment as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting;	Reject. Refer to submission point 194.16.

					Wetlands are not defined in the district plan despite being regionally mapped. Overly restrictive rules may discourage indigenous planting and create economic disincentives. Some non-threatened indigenous species (e.g., manuka) provide useful community resources such as firewood.	2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of chemicals including herbicide; 7. burning; 8. ~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion~~, including dryland cushionfield species;~~ 9. ~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site~~; b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	
301.18	Carolyn Thelning	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivize new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation establishedasat1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2.crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~harmful substances including herbicide; 7. burning; ~~8.the deliberate~~ application of water, fertiliser or over sowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ ~~9.the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	Reject. Refer to submission point 194.16.

302.18	Peter and Sandra Mitchell	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation establishedasat1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~harmful substances including herbicide; 7. burning; 8.~~the deliberate~~application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site;~~ b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	Reject. Refer to submission point 194.16.
303.18	Terry and Fiona Conlan	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Opposes in part the definition of Vegetation clearance. Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating. [Refer to original submission for full reasons]	Amend the definition to: Clarify or remove the reference to dryland cushionfield species. Remove or clearly define mob-stocking, or replace with pugging. Define established farming practice as ‘primary production activities established before 1st March 2025’. Suggested amendment as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of chemicals including herbicide; 7. burning; 8. ~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the	Reject. Refer to submission point 194.16.

						resident indigenous plant(s) are killed by competitive exclusion~~,~~ ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site~~; b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood [Refer to original submission for full relief sought]	
304.18	Kirsty and Nathan McLachlan	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating.	Seeks to amend as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of ~~chemicals~~ harmful substances including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, ~~including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site~~; b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	Reject. Refer to submission point 194.16.
305.18	Erin Nivonne Schultz	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Support	Generally, supports the Vegetation clearance definition. However, considers that it is appropriate to amend the terminology for clarity.	Seeks to amend definition as follows: 'means the removal, trimming, felling, or modification of any indigenous vegetation or the deliberate alteration of hydrological functions that support indigenous vegetation. It includes: 1. cutting; 2. crushing;	Reject. Refer to submission point 194.16.

						3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of chemicals which could damage the vegetation including herbicide; 7. burning; 8. the deliberate application of water, fertiliser or over sowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, including on dryland cushionfield species; 9. the drainage of wetlands or lakes; 10.~~mob-stocking~~highly intensive grazing; and 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land as part of established farming practice within a site; b. walking; c. sampling or undertaking studies; d. natural hazards.’	
306.18	Waitaki Property Guardians Incorporated	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Support	Generally, supports the Vegetation clearance definition. However, considers that it is appropriate to amend the terminology for clarity.	Amend definition as follows: ‘means the removal, trimming, felling, or modification of any indigenous vegetation or the deliberate alteration of hydrological functions that support indigenous vegetation. It includes: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of chemicals which could damage the vegetation including herbicide; 7. burning; 8. the deliberate application of water, fertiliser or over sowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion, including on dryland cushionfield species; 9. the drainage of wetlands or lakes; 10.~~mob-stocking~~ highly intensive grazing; and 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land as part of established farming practice within a site; b. walking; c. sampling or undertaking studies; d. natural hazards.’	Reject. Refer to submission point 194.16.
312.26	Springbank	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Amend	Opposes in part. The submitters consider term chemical too broad, 'harmful substance' should be used instead so beneficial chemicals (water or herbicides for plant protection) are not unintentionally captured. Considers change to the “hydrological balance” is	Seeking amendment as follows Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025or the deliberate alteration of hydrological	Reject. Refer to submission point 194.16.

					unrealistic because baseline information is rarely available. Some listed activities occur naturally, the definition should allow for this. Reference to dryland cushionfield species is unclear and needs clearer wording. Mob-stocking should be removed or clearly defined with stakeholder input. “Established farming practice” is undefined, leaving uncertainty about what grazing activities are permitted. Wetlands are not defined in the district plan, despite being mapped by the regional council. Indigenous vegetation on the property exists due to landowner preservation or planting; restricting its removal would discourage new indigenous plantings, undermining biodiversity goals. Some non-threatened indigenous species (e.g., mānuka) provide practical community benefits such as affordable firewood, which should be considered in the definition.	functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of chemicals including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or over sowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion~~, including dryland cushionfield species~~; 9.~~the~~drainage of mapped wetlands or lakes; 10.~~mob-stocking; and~~ 11. applying seed of exotic pasture. It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site~~; b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood	
313.330	Geoff & Jan Keeling - Keeling Dairies Limited	Definitions	Vegetation clearance means the removal, trimming, felling, or modification of any indige	Oppose	Opposes in part the definition of Vegetation clearance. Considers that the term 'chemical' [clause (6)] is too broad and could include harmless substances like water or atmospheric gases and that requiring proof of a change to the hydrological balance is impractical, as baseline data is not generally available. Considers that many of the listed effects may occur accidentally or naturally, and the wording should allow for such occurrences. Considers it ambiguous whether cushionfield [clause (8)] is the competitor or the outcompeted species referred to. Also considers the reference to mob-stocking [clause (10)] is unclear and potentially contradictory, as grazing is excluded from the definition and is often beneficial to ecosystems - suggests using the term 'pugging' as an alternative. Considers that the term 'established farming practice' lacks a clear method or explanation for how it is determined. Considers that restrictions on indigenous vegetation removal may disincentivise new plantings and will be more expensive to establish than exotic species (which also offer better returns under the Emissions Trading Scheme) and would also limit access to non-threatened indigenous species like manuka, which are valuable for low-cost home heating. [Refer to original submission for full reasons]	Amend the definition to: Clarify or remove the reference to dryland cushionfield species. Remove or clearly define mob-stocking, or replace with pugging. Define established farming practice as ‘primary production activities established before 1st March 2025’. Suggested amendment as follows: Vegetation clearance means the deliberate removal, trimming, felling, or modification of any indigenous vegetation established as at 1st March 2025 or the deliberate alteration of hydrological functions that support that indigenous vegetation. It includes deliberate: 1. cutting; 2. crushing; 3. cultivation; 4. over-planting; 5. soil disturbance including direct drilling; 6. application of chemicals including herbicide; 7. burning; 8.~~the deliberate~~ application of water, fertiliser or oversowing where it would change the ecological conditions such that the resident indigenous plant(s) are killed by competitive exclusion~~, including dryland cushionfield species;~~ 9.~~the~~ drainage of mapped wetlands or lakes; ~~10. mob-stocking; and~~ 11. applying seed of exotic pasture.	Reject. Refer to submission point 194.16.

						It does not include incidental loss from: a. grazing of land ~~as part of established farming practice within a site~~; b. walking; c. sampling or undertaking studies; d. natural hazards. e. non-commercial harvesting of firewood [Refer to original submission for full relief sought]	

Special Purpose Zone – Macraes Mining

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
194.124	Director-General of Conservation	Special Purpose Zone: Macraes Mining Zone	General	Support	Supports in part as given the nature and extent of mine development, it is practical and effective to apply a special purpose zone, and the proposed provisions appropriately recognise that there are still significant environmental values within the zone which require protection.	Retain as notified, except where specific changes are requested below.	Accept in part. It is noted that other amendments have been made in response to submissions.
194.125	Director-General of Conservation	Special Purpose Zone: Macraes Mining Zone	General	Support	Supports with amendments: Considers the User Notes provide some guidance on the other parts of the plan that also apply in this zone, but only specifically covers earthworks, buildings and structures. Consdiers that to provide certainty and clarity, it would assist to also refer to other key sections of the PDP.	Amend the 'User Notes' as follows, or words to similar effect: "For some activities, a resource consent may be required by rules in more than one chapter in the District Plan. Plan users are encouraged to check all District-Wide Matters chapters <u>including the Historical and Cultural Values and Natural Environment Values sections.</u>"	Reject
194.130	Director-General of Conservation	Special Purpose Zone: Macraes Mining Zone	General	Support	Considers that while supported in part, given the extent and effects of the existing mine, new mining activities cannot be adequately managed in isolation.	Insert a new policy as follows, or words to like effect: SPZMM -PX <u>"When giving effect to Policies SPZMM-P1 to SPZMM-P3, the adverse effects of new mining activities will be managed in an integrated manner with the effects of existing mining."</u>	Reject
249.2	New Zealand Minerals Council	Special Purpose Zone: Macraes Mining Zone	General	Support	Supports Macraes mine being subject to the provisions in the Special Purpose Zone – Macraes Mining PDP chapter. Because of the size and economic and social importance to Waitaki as well as its special characteristics, supports a separate special purpose zone for Macraes Mine. To be workable the Special Purpose Zone – Macraes Mining needs to be 'stand-alone' with its own enabling provisions that apply within the zone. Refer to the OceanaGold (New Zealand) Limited Submission [Submission # 295].	Retain the Special Purpose Zone - Macraes Mining as a stand-alone chapter with differentiated quarrying and mining provisions from general earthworks. [inferred relief requested].	Accept in part. Refer to submission 295.47.
249.4	New Zealand Minerals Council	Special Purpose Zone: Macraes Mining Zone	General	Amend	Supports the clarifying statement in the User Notes of the Earthworks chapter highlighting that mining activities are not subject to the general Earthworks provisions. This is very important to avoid confusion and contradictions created by the two sets of objectives, policies and rules. There needs to be a similar statement in the Special Purpose Zone – Macraes Mining PDP chapter that clarifies that the general earthworks provisions and the provisions relating to mining in Part B of the Earthworks chapter [EWQM] do not apply to the Special Purpose Zone – Macraes Mining chapter where that is the case.	Amend the User Notes: of the Special Purpose Zone – Macraes Mining chapter to differentiate between the provisions relating to Part A: EW and Part B: EWQM where that is the case.	Reject
251.368	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and	Special Purpose Zone: Macraes Mining Zone	General	Oppose	Opposes in part. Considers that defining the Potential Mining Area solely by past disturbance or the existence of a mining-related consent is too uncertain. The submitter also considers that the provisions fail to explain how areas	Seeks to map Potential Mining Area or provide greater clarity as to the process by which areas shift from the Potential Mining Area to the Existing Mining Area.	Reject

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
	Kāti Huirapa Rūnaka ki Puketeraki				transition to the Existing Mining Area, creating uncertainty about when activity status would change. [refer to original submission for full reasons]		
295.7	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that a new policy is required to recognise that what may now be defined as "potential" mining areas may be mined in future and in that event, should then be managed in a manner consistent with "existing" mining areas.	Seeks to add a new policy as follows: SPZMM-PX Identification of Existing and Potential mining areas Where any new mining activity within the Special Purpose Zone - Macraes Mining is authorised by way of a resource consent or lawful approval process, regard that area as an Existing Mining Area subject to the Zone provisions for Existing Mining Areas.	Reject
295.11	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers a new policy is required to ensure that mine closure activities, considered part of "mining activities", are clearly recognised and provided for within the Special Purpose Zone – Macraes Mining, as these activities may continue long after mineral extraction ends.	Seeks to add a new policy as follows: SPZMM-PX Mine closure activities Provide for mining activities that continue after mineral extraction and processing has ceased and recognise that such activities are necessary to achieve successful mine closure.	Accept
295.12	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that the current rule framework does not adequately provide for mining and related activities, nor does it effectively implement the objectives and policies of the Special Purpose Zone – Macraes Mining.	Seeks to ensure the rules for the Special Purpose Zone – Macraes Mining appropriately provide for mining activities and associated activities. Seeks specific relief in the form of new rules outlined in submission, or other such relief as to address OceanaGold's concern that the rule framework does not include adequate provision for mining.	Accept in part. This submission point is accepted to the extent it is addressed by other submission points.
295.13	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that the SPZMM should be a standalone chapter, with all relevant rules and standards included, to avoid overlap with other chapters and ensure the zone's purpose is not undermined.	Seeks to include all relevant rules and standards that would otherwise apply to the SPZMM into the chapter to ensure it becomes a stand-alone chapter. This includes rules/standards relating to: - Noise (including vibration and blasting) - Lighting - Traffic - Earthworks - Hazardous substances - Indigenous vegetation / biodiversity - Riparian margins etc Seeks to apply appropriate limits that are fit for purpose for the SPZMM reflecting its purpose and significant benefits to the District. Seeks that standards for Existing Mining Areas should align with existing resource consent conditions as far as possible.	Reject
295.17	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers exploration should be provided for as a permitted activity within the Potential Mining Area, as it supports defining known mineral resources and suitable mining methods.	Seeks to add new rule as follows: SPZMM-RX Exploration Special Purpose Zone - Macraes Mining Potential Mining Area Activity status: Permitted Where: 1. Land disturbance must be restricted to 100 m2 per exploration site. 2. the generation of noise, vibration and lighting must comply with Standards X, Y, and Z [equivalent to the zone standards for mining activities]; and 3. The area must be rehabilitated (if not subsequently mined) as follows:	Reject

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
						a. topsoil shall be stripped and stockpiled and be reused for rehabilitation purposes b. final rehabilitation earthworks shall be formed such that the contours and transitions closely resemble and blend in with the surrounding natural landform Activity status when compliance is not achieved: Controlled Matters of control are restricted to: 1. the duration, timing, frequency, extent and staging of works 2. the generation of noise, vibration and lighting; and 3. disturbance to land, including vegetation clearance; and 4. siting of tracks, parking areas, buildings or other equipment; and 5. adverse effects related to landscape, significant historic heritage and significant indigenous biodiversity; and 6. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan.	
295.18	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that other mining activities (excluding underground mining, open pits, waste rock stacks, and tailings facilities) should be provided for as permitted activities in the Existing Mining Area if their effects are similar to existing or consented activities.	Seeks to add new rule as follows: SPZMM-RX Mining activities (excluding underground mining, open pits, waste rock stacks and tailings storage facilities) Special Purpose Zone - Macraes Mining Existing Mining Area Activity status: Permitted Where: 1. the generation of noise, vibration and lighting must comply with Standards A, B, and C [equivalent to conditions relating to noise, vibration and lighting on existing resource consents for mining activities]. 2. The area is rehabilitated upon completion of mining either: a. In accordance with a Rehabilitation Management Plan that is submitted to the Council upon completion of mining demonstrating how the rehabilitation will align with the rehabilitation obligations on existing land use consents; or b. As follows: i. topsoil shall be stripped and stockpiled and be reused for rehabilitation purposes ii. land shall be replanted with vegetation species that integrate with the adjacent vegetation community and which visually blends into the surrounding country iii. final rehabilitation earthworks shall be formed such that the contours and transitions closely resemble and blend in with the surrounding natural landform Activity status when compliance is not achieved: Controlled Matters of control are restricted to: 1. the duration, timing, frequency, extent and staging of works; and 2. the generation of noise, vibration, lighting and traffic; and	Reject

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
						3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and 4. siting of buildings, infrastructure, or other equipment, including plant required to process minerals; and 5. landscaping treatment, including the shaping of the pits and pit margins, the siting and shaping of waste rock stacks and embankments, tailings impoundments, any other dams and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and private tracks; and 7. measures to maintain indigenous biodiversity; and 8. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan	
295.19	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that mining activities (excluding underground mining, open pits, waste rock stacks and tailings storage facilities) should be provided for as permitted activities within the Potential Mining Area subject to standards.	Seeks to add new rule as follows: SPZMM-RX Mining activities (excluding underground mining, open pits, waste rock stacks and tailings storage facilities) Special Purpose Zone - Macraes Mining Potential Mining Area Activity status: Permitted Where: 1. the generation of noise, vibration and lighting must comply with Standards X, Y, and Z [equivalent to the zone standards for mining activities]. 2. The area is rehabilitated upon completion of mining as follows: a. topsoil shall be stripped and stockpiled and be reused for rehabilitation purposes b. land shall be replanted with vegetation species that integrate with the adjacent vegetation community and which visually blends into the surrounding country c. final rehabilitation earthworks shall be formed such that the contours and transitions closely resemble and blend in with the surrounding natural landform Activity status when compliance is not achieved: Controlled Matters of control are restricted to: 1. the duration, timing, frequency, extent and staging of works; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and 4. siting of buildings, infrastructure, or other equipment, including plant required to process minerals; and 5. landscaping treatment, including the shaping of the pits and pit margins, the siting and shaping of waste rock stacks and embankments, tailings impoundments, any other dams and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste	Reject

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
						rock stacks and embankments, tailings impoundments and any other dams, roads and private tracks; and 7. measures to maintain indigenous biodiversity; and 8. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan	
295.20	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that underground mining should be provided for as a permitted activity within the Existing Mining Area.	Seeks to add new rule as follows: SPZMM-RX Underground mining Special Purpose Zone - Macraes Mining Existing Mining Area Activity status: Permitted Activity status when compliance is not achieved: Not applicable	Reject
295.21	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that underground mining should be provided for as a controlled activity within the Potential Mining Area.	Seeks to add new rule as follows: SPZMM-RX Underground mining Special Purpose Zone - Macraes Mining Potential Mining Area Activity status: Controlled Matters of control are restricted to: 1. the generation of noise and vibration; and 2. adverse effects on land stability. Activity status when compliance is not achieved: Not applicable	Reject
295.22	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that the extension of waste rock stacks, open pits, and tailings storage facilities should be provided for as permitted activities within the Existing Mining Area subject to those activities not having adverse effects that differ significantly from existing or consented activities in those areas.	Seeks to add new rule as follows: SPZMM-RX Extension of waste rock stacks, open pits, and tailings storage facilities Special Purpose Zone - Macraes Mining Existing Mining Area Activity status: Permitted Where: 1. the generation of noise, vibration and lighting must comply with Standards A, B, and C [equivalent to conditions relating to noise, vibration and lighting on existing resource consents for mining activities]. 2. The area is rehabilitated upon completion of mining either: a. In accordance with a Rehabilitation Management Plan that is submitted to the Council upon completion of mining demonstrating how the rehabilitation will align with the rehabilitation obligations on existing land use consents; or b. As follows: i. topsoil shall be stripped and stockpiled and be reused for rehabilitation purposes ii. open pits shall be backfilled to the extent practicable or other wise left to form lakes	Reject

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
						iii. land shall be replanted with vegetation species that integrate with the adjacent vegetation community and which visually blends into the surrounding country iv. final rehabilitation earthworks shall be formed such that the contours and transitions closely resemble and blend in with the surrounding natural landform Activity status when compliance is not achieved: Controlled Matters of control are restricted to: 1. the duration, timing, frequency, extent and staging of works; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and 4. siting of buildings, infrastructure, or other equipment, including plant required to process minerals; and 5. landscaping treatment, including the shaping of the pits and pit margins, the siting and shaping of waste rock stacks and embankments, tailings impoundments, any other dams and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and private tracks; and 7. measures to maintain indigenous biodiversity; and 8. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan	
295.23	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that the extension of waste rock stacks, open pits, and tailings storage facilities should be provided for as controlled activities within the Potential Mining Area as such activities are anticipated in this area.	Seeks to add new rule as follows: SPZMM-RX Extension of waste rock stacks, open pits, and tailings storage facilities Special Purpose Zone - Macraes Mining Potential Mining Area Activity status: Controlled Matters of control are restricted to: 1. the duration, timing, frequency, extent and staging of works; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and 4. siting of buildings, infrastructure, or other equipment, including plant required to process minerals; and 5. landscaping treatment, including the shaping of the pits and pit margins, the siting and shaping of waste rock stacks and embankments, tailings impoundments, any other dams and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and private tracks; and	Reject

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
						7. measures to maintain indigenous biodiversity; and 8. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan	
295.24	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that the construction of new waste rock stacks, open pits, and tailings storage facilities should be provided for as controlled activities within the Existing Mining Area as these activities are expected but may have different effects than those currently occurring or consented in the Existing Mining Area.	Seeks to add new rule as follows: SPZMM-RX Construction of new waste rock stacks, open pits, and tailings storage facilities Special Purpose Zone - Macraes Mining Existing Mining Area Activity status: Controlled Matters of control are restricted to: 1. the duration, timing, frequency, extent and staging of works; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and 4. siting of buildings, infrastructure, or other equipment, including plant required to process minerals; and 5. landscaping treatment, including the shaping of the pits and pit margins, the siting and shaping of waste rock stacks and embankments, tailings impoundments, any other dams and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and private tracks; and 7. measures to maintain indigenous biodiversity; and 8. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan	Reject
295.25	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers new waste rock stacks, open pits, and tailings storage facilities should be provided for as restricted discretionary activities in the Potential Mining Area, due to their anticipated but potentially new environmental effects.	Seeks to add new rule as follows: SPZMM-RX Construction of new waste rock stacks, open pits, and tailings storage facilities Special Purpose Zone - Macraes Mining Potential Mining Area Activity status: Restricted Discretionary Matters of discretion are restricted to: 1. the duration, extent, location and staging of the excavation and construction of pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads, buildings and tracks associated with mining; and 2. the generation of noise, vibration, lighting and traffic; and 3. disturbance to land, including vegetation clearance and volumes of material to be removed in relation to the consequential size of any waste rock stacks; and	Reject

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
						4. the location of plant used to process any mineral; and 5. landscaping treatment, including the siting and shaping of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, and the siting of roads and tracks; and 6. measures to manage long-term structural stability, environmental integrity, and safety of the pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and tracks; and 7. adverse effects on, and measures to maintain indigenous biodiversity, landscape, heritage and cultural values; and 8. the regional and national benefits associated with the mineral extraction; and 9. any biodiversity offsetting or biodiversity compensation provided by the applicant in accordance with the biodiversity effects management hierarchy; and 10. the matters addressed in the content of the rehabilitation plan. Note: Section 88 Information Requirements for Applications: Pursuant to s88 of the RMA, any applications for activities under this rule must provide, in addition to the standard information requirements, a rehabilitation plan	
295.26	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	General	Amend	Considers that a new rule permitting subdivision linked to mining activities should be added to support efficient mineral access and smooth transition to post-mining land uses.	Seeks to add new rule as follows: SPZMM – RX Subdivision for mining activities Special Purpose Zone - Macraes Mining Activity status: Permitted Where: PER-1 The subdivision is solely for the purpose of facilitating mining activities including mine closure. Activity status when compliance is not achieved: Discretionary	Reject
194.126	Director-General of Conservation	Special Purpose Zone: Macraes Mining Zone	SPZMM-O1 Purpose of the Special Purpose Zone – Macraes Mining The economic, cultural an	Support	Support in part SPZMM-O1 'Purpose of the Special Purpose Zone – Macraes Mining' as requiring that adverse effects only need to be 'avoided, remedied or mitigated' would potentially allow significant adverse effects to still occur (particularly in the context of mining, where avoidance or remedy are often unachievable). This would be inconsistent with Part 2 of the RMA and Council's s31(1)(b)(iii) function to maintain Indigenous biodiversity.	Amend as follows, or words to like effect: "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 so that the natural values of the Special Purpose Zone are maintained."	Reject
295.4	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-O1 Purpose of the Special Purpose Zone – Macraes Mining The economic, cultural an	Amend	Supports the objective's recognition of the economic, cultural, and social benefits of mining in the Hyde-Macraes Shear Zone, but seeks inclusion of national, regional, and district benefits, and acknowledgement that some residual effects may occur and need to be offset, compensated, or accepted due to the functional need for mining in that location. Considers it should be acknowledged in order to give effect to the NPSIB, especially clause 3.10.	Seeks to retain the objective and amend to include reference to: 1. The national, regional and district benefits of mining activities in this zone. 2. Recognise that not all adverse effects can be fully avoided, remedied or mitigated and that provision needs to be made for enabling access to offsetting and compensation – and an acceptance that some residual effects may be acceptable in context of this zone given that mining activities have a functional need to be located where the mineral resource exists. 3. "enabling" and providing for mining	Accept in part
310.66	Graymont (NZ) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-O1 Purpose of the Special Purpose Zone – Macraes Mining The	Support	Supports the recognition of Macraes goldmine as New Zealand's largest, noting its significant economic, cultural, and social benefits and endorses the Special Purpose Zone – Macraes Mining and that its less restrictive rules are	Seeks for greater recognition to quarrying, mining and mineral processing activities as a whole, and the benefits to be brought	Reject

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
			economic, cultural an		appropriate and consistent with other districts. Considers that the PDP should better recognise the benefits of mining and quarrying activities throughout the district, as these are essential for regional and national development.	about by the same, as identified in the other sections of this submission.	
194.127	Director-General of Conservation	Special Purpose Zone: Macraes Mining Zone	SPZMM-P1 Existing Mining Areas The Existing Mining Area within the Special Purpose Zone	Support	Support in part as this policy appropriately recognises that biodiversity values which remain after mining should be protected as part of maintaining Indigenous biodiversity overall. This support is subject to new Policy SPZMM-PX sought below.	Retain SPZMM-P1 'Existing Mining Areas' as notified.	Accept in part, except as modified by other submissions.
251.369	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Special Purpose Zone: Macraes Mining Zone	SPZMM-P1 Existing Mining Areas The Existing Mining Area within the Special Purpose Zone	Oppose	Opposes in part. Considers that inconsistencies exist between the definition of the Existing Mining Area and its policy description.	Seeks amendments to the definition of Existing Mining Area and/or the chapeau of SPZMM-P1 to make these consistent.	Accept
251.370	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Special Purpose Zone: Macraes Mining Zone	SPZMM-P1 Existing Mining Areas The Existing Mining Area within the Special Purpose Zone	Oppose	Considers the range of effects addressed for new mining activities to be too narrow because it only accounts for biodiversity values previously subject to management, excluding other existing or naturally emerging values. The submitter also considers that sensitive environments are overlooked, and that effects from new activities should be assessed more comprehensively, similar to the approach applied in the Potential Mining Area. [refer to original submission for full reasons]	Seeks to amend clause 1 as follows: maintain any indigenous biodiversity values present ~~due to previous avoidance or mitigation measures;~~ and... Seeks to add a new clause as follows: 3. avoid compromising achievement of the relevant objectives and policies for any sensitive environments.	Reject
295.5	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-P1 Existing Mining Areas The Existing Mining Area within the Special Purpose Zone	Amend	Supports the concept of Existing Mining Areas but considers the policy should focus on what activities are allowed within them, rather than describing the areas, which are already covered by definitions.	Seeks to delete the policy, or amend as follows: Provide for prospecting, exploration and mining activities within Existing Mining Areas where the adverse effects of such activities are not significantly different to lawfully established or authorised activities.	Accept in part
310.67	Graymont (NZ) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-P1 Existing Mining Areas The Existing Mining Area within the Special Purpose Zone	Support	Supports the recognition of Macraes goldmine as New Zealand's largest, noting its significant economic, cultural, and social benefits and endorses the Special Purpose Zone – Macraes Mining and that its less restrictive rules are appropriate and consistent with other districts. Considers that the PDP should better recognise the benefits of mining and quarrying activities throughout the district, as these are essential for regional and national development.	Seeks for greater recognition to quarrying, mining and mineral processing activities as a whole, and the benefits to be brought about by the same, as identified in the other sections of this submission.	Reject
83.12	Waitaki District Council	Special Purpose Zone: Macraes Mining Zone	SPZMM-P2 Potential Mining Areas The Potential Mining Area within the Special Purpose Z	Amend	Submitter seeks to amend terminology to align with the rest of the plan	Amend text as follows: The Potential Mining Area within the Special Purpose Zone – Macraes Mining applies to those areas where mining has not previously occurred in the zone, but which may be appropriate for mining activities, provided that they: 1. avoid, remedy or mitigate the adverse effects from noise, vibration, lighting, or from traffic on amenity values in the adjoining General Rural Zone; and 2. in the first instance, avoid locating in: a. Outstanding Natural Features or Landscape; b. places containing historic heritage items; or c. Significant Natural Areas or areas of indigenous vegetation assessed as being significant under APP5 - Criteria for identifying areas that qualify as SNA; and 3. if it is not practicable to avoid locating in those areas identified in 2(a) or 2(b) above because of the functional	Accept

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
						needs of the activity, then avoid, remedy or mitigate, as necessary, adverse effects on the values in order to maintain the~~exceptional,~~significant or outstanding nature of those areas; and 4. if it is not practicable to avoid locating in areas identified under (2)(c) above, then managing the effects in accordance with Policy ECO-P2(2); and 5. do not compromise the identified characteristics and values of any sensitive environment and achieve the relevant objectives and policies for the sensitive environment, except as provided for in 2 and 3 above; and 6. avoid adverse effects on the health and safety of the community; and 7. reducing unavoidable adverse effects by: a. staging development for longer-term activities; and b. progressively rehabilitating the site, where possible; and 8. applying a precautionary approach (including adaptive management where appropriate) to assessing the effects of the activity where there is scientific uncertainty, and potentially significant or irreversible effects; and 9. where there is a conflict between this policy and other policies in the district plan (except in relation to the Historic Heritage Chapter), this policy shall prevail.	
194.128	Director-General of Conservation	Special Purpose Zone: Macraes Mining Zone	SPZMM-P2 Potential Mining Areas The Potential Mining Area within the Special Purpose Z	Support	Support with amendments: The proposed approach would give effect to the NPS-IB provisions for mining activities within SNAs, but would not apply the effects management hierarchy to Indigenous biodiversity outside SNAs as required by NPS-IB Clause 3.16. This support is subject to new policy SPZMM-PX sought below [refer submission point 194.132].	Insert a new clause as follows (or words to similar effect): " ...4a. when locating outside areas identified under (2)(c) above, managing significant effects in accordance with Policy ECO-P2(2); and..."	Reject. This submission point is out of scope.
251.371	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Special Purpose Zone: Macraes Mining Zone	SPZMM-P2 Potential Mining Areas The Potential Mining Area within the Special Purpose Z	Support	Supports in part. Considers that the direction to protect sensitive environments is appropriate and supports retaining the clause relating to ensuring the values of these environments are not compromised.	Seeks to retain clause 5.	Accept
295.6	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-P2 Potential Mining Areas The Potential Mining Area within the Special Purpose Z	Amend	Supports the concept of Potential Mining Areas but believes the policy should focus on what activities are allowed, rather than describing the area, and notes that overlays like ONFLs, SNAs, and heritage sites may conflict with the zone's purpose and should only apply where values are truly significant. Also considers this policy would be better placed in a general rural section of the plan such that these tests can be applied to other locations where such analysis has not yet been undertaken, as zoning for mining implies prior analysis confirming the area's suitability.	Seeks to delete the policy, or amend as follows: ~~The Potential Mining Area within the Special Purpose Zone - Macraes Mining applies to those areas where mining activities have not previously occurred in the zone, but which may be appropriate for mining activities, provided that they:~~ Provide for prospecting, exploration and mining activities within Potential Mining Areas, provided those activities: 1. avoid, remedy or mitigate the adverse effects from noise, vibration, or lighting,~~or from traffic~~ on amenity values in the adjoining General Rural Zone; and 2.~~in the first instance, avoid locating in:~~ ~~a. Outstanding Natural Features or Landscape;~~ ~~b. places containing historic heritage items; or~~ ~~c. Significant Natural Areas or areas of indigenous vegetation assessed as being significant under APP5 – Criteria for identifying areas that qualify as SNA; and~~	Accept in part

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
						~~3. if it is not practicable to avoid locating in those areas identified in 2(a) or 2(b) above because of the functional needs of the activity, then avoid, remedy or mitigate, as necessary, adverse effects on the values in order to maintain the exceptional, significant or outstanding nature of those areas; and~~ ~~4. if it is not practicable to avoid locating in areas identified under (2)(c) above, then managing the effects in accordance with Policy ECO-P2(2); and~~ ~~5. do not compromise the identified characteristics and values of any sensitive environment and achieve the relevant objectives and policies for the sensitive environment, except as provided for in 2 and 3 above; and~~ 6. avoid adverse effects on the health and safety of the community; and 7. reducing unavoidable adverse effects by: a. staging development for longer-term activities; and b. progressively rehabilitating the site, where possible; and/or c. offsetting or compensating for such effects; and 8. applying a precautionary approach (including adaptive management where appropriate) to assessing the effects of the activity where there is scientific uncertainty, and potentially significant or irreversible effects; and 9. where there is a conflict between this policy and other policies in the district plan ~~(except in relation to the Historic Heritage Chapter)~~, this policy shall prevail.	
310.68	Graymont (NZ) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-P2 Potential Mining Areas The Potential Mining Area within the Special Purpose Z	Support	Supports the recognition of Macraes goldmine as New Zealand's largest, noting its significant economic, cultural, and social benefits and endorses the Special Purpose Zone – Macraes Mining and that its less restrictive rules are appropriate and consistent with other districts. Considers that the PDP should better recognise the benefits of mining and quarrying activities throughout the district, as these are essential for regional and national development.	Seeks for greater recognition to quarrying, mining and mineral processing activities as a whole, and the benefits to be brought about by the same, as identified in the other sections of this submission.	Reject
194.129	Director-General of Conservation	Special Purpose Zone: Macraes Mining Zone	SPZMM-P3 Rehabilitation after mining Require any new mining activity and quarrying acti	Support	Supports in part and the recognition of rehabilitation. This support is subject to new policy SPZMM-PX sought below [refer submission point 194.132].	Retain SZMM-P3 'Rehabilitation after mining' as notified.	Accept in part, except as modified by other submissions.
251.372	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Special Purpose Zone: Macraes Mining Zone	SPZMM-P3 Rehabilitation after mining Require any new mining activity and quarrying acti	Oppose	Opposes in part. Considers that the current rehabilitation requirements are inadequate because they do not prevent contaminants from reaching waterways through leaching, and equivalent provisions found in other zones are missing. The submitter also considers that rehabilitation should enhance indigenous biodiversity by reinstating native vegetation where appropriate. [refer to original submission for full reasons]	Seeks to add new clauses as follows: 9. measures to contain or otherwise manage contaminants from overburden or disturbed areas to avoid generation of contaminant discharges to any water body; and 10. opportunities to enhance indigenous biodiversity.	Accept in part
295.8	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-P3 Rehabilitation after mining Require any new mining activity and quarrying acti	Amend	Considers the policy should provide scope to rehabilitate landforms with a vegetation type that differs from what existed previously.	Seeks to amend the policy to provide flexibility for replacement vegetation to be different in type to previous vegetation type.	Reject
251.373	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Special Purpose Zone: Macraes Mining Zone	SPZMM-P4 Exploration in the Potential Mining Area Recognise the need to investigate the	Amend	Considers clause 1 is unnecessary as it is already covered by clause 3.	Seeks to amend as follows: Recognise the need to investigate the gold resource through exploration in the Potential Mining Area, while controlling the activity to:	Accept

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
						~~1. avoid, remedy or mitigate the actual or potential adverse effects on amenity values in the adjoining General Rural Zone; and~~ 2. requiring rehabilitation of the disturbed ground; and 3. manage adverse effects related to exploration in accordance with policy SPZMM-P2.	
295.9	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-P4 Exploration in the Potential Mining Area Recognise the need to investigate the	Amend	Considers the policy should be amended to refer to exploration anywhere within the Special Purpose Zone - Macraes Mining.	Seeks to amend as follows: SPZMM-P4 Exploration in the ~~Potential Mining Area~~ Special Purpose Zone — Macraes Mining Recognise the need to investigate the gold resource through exploration in the Special Purpose Zone — Macraes Mining ~~Potential Mining Area, while controlling~~ by permitting the activity ~~to~~ while: 1. avoiding, remedy~~ing~~ or mitigate~~ing~~ the actual or potential adverse effects on amenity values in the adjoining General Rural Zone; and 2. requiring rehabilitation of the disturbed ground unless mining activities follow; and 3. manage~~ing~~ adverse effects related to exploration in accordance with policy SPZMM-P2.	Reject
310.69	Graymont (NZ) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-P4 Exploration in the Potential Mining Area Recognise the need to investigate the	Support	Supports the recognition of Macraes goldmine as New Zealand's largest, noting its significant economic, cultural, and social benefits and endorses the Special Purpose Zone – Macraes Mining and that its less restrictive rules are appropriate and consistent with other districts. Considers that the PDP should better recognise the benefits of mining and quarrying activities throughout the district, as these are essential for regional and national development.	Seeks for greater recognition to quarrying, mining and mineral processing activities as a whole, and the benefits to be brought about by the same, as identified in the other sections of this submission.	Reject
242.80	Ministry of Education Te Tāhuhu o Te Mātauranga	Special Purpose Zone: Macraes Mining Zone	SPZMM-P5 Non-mining activities Enabling primary production, rural industry, recreationa	Support	Seeks that educational facilities are provided for in the Special Purpose Zone - Macraes Mining. Considers that educational facilities should be provided for where there is a need for schools to support the community within the Special Purpose Zone - Macraes Mining. Considers that educational facilities are essential social infrastructure that may need to be located within this zone.	Seeks to amend as follows: Non-mining activities Enabling primary production, rural industry, recreational activities, conservation activities, small-scale commercial activities, visitor accommodation~~and~~, residential activities and educational facilities within the Special Purpose Zone – Macraes Mining where these are consistent with the purpose, character and qualities of the General Rural Zone and minimise the potential for reverse sensitivity effects.	Reject
295.10	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-P5 Non-mining activities Enabling primary production, rural industry, recreationa	Amend	Considers that some of the identified activities in the policy are inappropriate to be enabled as of right in the Special Purpose Zone – Macraes Mining.	Seeks to amend as follows: Enable~~ing~~ primary production, rural industry, recreational activities, conservation activities, small-scale commercial activities, ~~visitor accommodation and residential activities~~ within the Special Purpose Zone – Macraes Mining where these are consistent with the purpose, character and qualities of the General Rural Zone and minimise the potential for reverse sensitivity effects.	Accept in part
163.80	Fire and Emergency New Zealand	Special Purpose Zone: Macraes Mining Zone	SPZMM-R1 Building activity Special Purpose Zone - Macraes Mining Activity status: Per	Support	Supports building activity being subject to the 'servicing and firefighting water supply and access' standard as notified.	Retain as notified.	Accept
295.14	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R1 Building activity Special Purpose Zone - Macraes Mining Activity status: Per	Amend	Considers building activities connected to mining to fall within the definition of "mining activities," and seeks clarification that the rule applies only to unrelated building activities within the SPZMM.	Seeks to amend as follows: SPZMM-R1 Building activity not associated with mining	Reject

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295.32	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R10 Visitor accommodation Special Purpose Zone - Macraes Mining Activity status	Oppose	Opposes sensitive activities near existing mining operations in the SPZMM due to health and safety risks. While on-site staff accommodation may be needed, it would fall under "mining activities" and not rely on this rule.	Seeks to delete the rule.	Accept
295.33	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R11 Home business (excluding primary production activity) Special Purpose Zone -	Oppose	Does not consider this activity to be consistent with the intent and purpose of this zone as set out in SPZMM-O1.	Seeks to delete the rule.	Reject
251.375	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Special Purpose Zone: Macraes Mining Zone	SPZMM-R12 Intensive indoor primary production and intensive outdoor primary production	Amend	Considers that intensive indoor primary production may generate adverse effects beyond site boundaries. [refer to original submission for full reasons]	Seeks amendments to include a setback from sensitive environments	Reject
295.34	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R12 Intensive indoor primary production and intensive outdoor primary production	Amend	Considers that farming activities and mining activities can co-locate, but notes that there would clearly be issues with operational mining areas should this intensive activity occur in close proximity to these sites.	Seeks to retain as notified - also seeks to include provisions so that operational mining areas are not affected by the establishment of these activities in the zone. Including suitable setbacks from operational mining areas would be appropriate in this regard.	Reject
295.35	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R13 Recreational activity Special Purpose Zone - Macraes Mining Activity status	Amend	Considers that whilst post mining activity recreational opportunities could be created in some locations of the zone, there would clearly be operational health and safety concerns should this activity occur during active mining phases.	Seeks to amend the rule to suitably recognise that this activity would not be compatible with active operational mining areas.	Accept
295.36	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R14 Conservation activities Special Purpose Zone - Macraes Mining Activity stat	Amend	Considers conservation activities connected to mining as part of "mining activities," and clarifies that the rule only applies to conservation activities not linked to mining within the SPZMM.	Seeks to amend as follows: SPZMM-R14 Conservation activities <u>not associated with mining</u> ...	Reject
295.37	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R15 Commercial activity Special Purpose Zone - Macraes Mining Activity status:	Oppose	Opposes allowing commercial activities in active mining areas and questions how the rule would apply in practice, including whether small outlets like a staff tuck shop would be permitted.	Seeks to delete the provision.	Reject
295.38	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R16 Aeroplane airstrips and helicopter landing areas, and the use of these by aircraft	Amend	Supports helicopter use for mining (a primary production activity) but recommends expanding the rule to include aircraft activity for exploration, prospecting, and conservation and not just primary production.	Seeks to amend the rule so that it provides for a wider range of activities that may require the use of aircraft as a necessary component.	Accept
251.376	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Special Purpose Zone: Macraes Mining Zone	SPZMM-R17 Carbon forestry Special Purpose Zone - Macraes Mining Activity status: Perm	Amend	Considers that if indigenous carbon forestry is intended to be permitted, several standards are unnecessary or inappropriate. [refer to original submission for full reasons]	Seeks to delete PER-2 to PER-6	Reject
295.39	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R17 Carbon forestry Special Purpose Zone - Macraes Mining Activity status: Perm	Amend	Supports carbon forestry in the Macraes Zone but considers provision should be made for the planting of exotic species as part of carbon forestry, and for planting to occur on mapped highly productive land within the zone (if any).	Seeks to amend the rule so that planting of exotic species is provided for as part of carbon forestry, including amending DIS-2 and PRO-1 so that exotic planting on Rural Scenic Landscape or sensitive environment within the zone (if any) is not prohibited, and forestry can be planted on mapped highly productive land within the zone (if any) .	Reject

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
251.377	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Special Purpose Zone: Macraes Mining Zone	SPZMM-R18 Exploration Special Purpose Zone – Macraes Mining - Potential Mining Area A	Oppose	Opposes in part. Considers that exploration rules do not adequately address effects on natural features, natural character, and cultural values. The submitter seeks amendments to ensure these effects are controlled and that rehabilitation plan requirements match those applied elsewhere. [refer to original submission for full reasons]	Seeks to amend SPZMM-R18(5) as follows: adverse effects related to landscape, natural features, natural character, cultural values, historic heritage and indigenous biodiversity; and… Seeks to amend SPZMM-R18(6) to include reference to EW(M) – APP1	Accept in part
295.40	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R18 Exploration Special Purpose Zone – Macraes Mining - Potential Mining Area A	Oppose	Considers that exploration activities should be permitted throughout the zone as this would properly reflect the purpose of the zone and the low level of effects associated with exploration activities.	Seeks to delete the rule and replace with new permitted activity rules for exploration.	Reject
310.72	Graymont (NZ) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R18 Exploration Special Purpose Zone – Macraes Mining - Potential Mining Area A	Amend	Supports the recognition of Macraes goldmine as New Zealand's largest, noting its significant economic, cultural, and social benefits and endorses the Special Purpose Zone – Macraes Mining and that its less restrictive rules are appropriate and consistent with other districts. Considers that the PDP should better recognise the benefits of mining and quarrying activities throughout the district, as these are essential for regional and national development.	Seeks for greater recognition to quarrying, mining and mineral processing activities as a whole, and the benefits to be brought about by the same, as identified in the other sections of this submission and that similar provisions to those in the SPZMM should be included in the proposed Plan with regard to quarrying.	Reject
194.131	Director-General of Conservation	Special Purpose Zone: Macraes Mining Zone	SPZMM-R19 Mining activities Special Purpose Zone – Macraes Mining - Existing Mining Are	Oppose	Opposes SPZMM-R19 'Mining activities' as providing for mining as a controlled activity would fail to adequately manage the effects on natural values. The definition of Existing Mining Area is too uncertain to be used to define activity status, and areas which have already been mined can still have significant natural and other values. This means that mining activities should be treated the same whether or not the area has previously been mined.	Delete this SPZMM-R19 'Mining activities' rule and manage all mining activities under SPZMM-R20.	Reject
251.378	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Special Purpose Zone: Macraes Mining Zone	SPZMM-R19 Mining activities Special Purpose Zone – Macraes Mining - Existing Mining Are	Oppose	Considers that mining activity rules insufficiently address effects on sensitive environments, cultural values, and contaminant discharges. The submitter seeks additional matters of control and reference to established rehabilitation plan requirements. [refer to original submission for full reasons]	Seeks to add new matters of control as follows: x. Measures to avoid or mitigate adverse effects on the values of sensitive environments and on cultural values; y. Measures to avoid generation of contaminant discharges to waterways; Seeks to amend SPZMM-R19(8) to include reference to EW(M) – APP1.	Accept in part
295.41	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R19 Mining activities Special Purpose Zone – Macraes Mining - Existing Mining Are	Oppose	Considers that existing and some new mining activities should be permitted in the Existing Mining Area to reflect the zone's enabling intent, and considers that it may be appropriate for some new mining activities to require resource consent and proposes a new suite of rules which address its concerns [refer to prior submission points].	Seeks to delete the rule and replace with new rules for mining activities outlined above [refer to previous submission points].	Reject
310.73	Graymont (NZ) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R19 Mining activities Special Purpose Zone – Macraes Mining - Existing Mining Are	Amend	Supports the recognition of Macraes goldmine as New Zealand's largest, noting its significant economic, cultural, and social benefits and endorses the Special Purpose Zone – Macraes Mining and that its less restrictive rules are appropriate and consistent with other districts. Considers that the PDP should better recognise the benefits of mining and quarrying activities throughout the district, as these are essential for regional and national development.	Seeks for greater recognition to quarrying, mining and mineral processing activities as a whole, and the benefits to be brought about by the same, as identified in the other sections of this submission and that similar provisions to those in the SPZMM should be included in the proposed Plan with regard to quarrying.	Reject
295.15	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R2 Prospecting Special Purpose Zone - Macraes Mining Activity status: Permitted	Support	Supports the provision for prospecting as a permitted activity within the entirety of the SPZMM.	Retain as notified.	Accept

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
310.70	Graymont (NZ) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R2 Prospecting Special Purpose Zone - Macraes Mining Activity status: Permitted	Amend	Supports the recognition of Macraes goldmine as New Zealand's largest, noting its significant economic, cultural, and social benefits and endorses the Special Purpose Zone – Macraes Mining and that its less restrictive rules are appropriate and consistent with other districts. Considers that the PDP should better recognise the benefits of mining and quarrying activities throughout the district, as these are essential for regional and national development.	Seeks for greater recognition to quarrying, mining and mineral processing activities as a whole, and the benefits to be brought about by the same, as identified in the other sections of this submission and that similar provisions to those in the SPZMM should be included in the proposed Plan with regard to quarrying.	Reject
194.132	Director-General of Conservation	Special Purpose Zone: Macraes Mining Zone	SPZMM-R20 Mining Activities Special Purpose Zone - Macraes Mining – Potential Mining Ar	Oppose	Support with amendments as has been outlined above, this rule needs to also apply to mining activities within the Existing Mining Area.	Amend this rule to remove the limitation to Potential Mining Areas, such that it applies to all mining in the zone.	Reject
251.379	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Special Purpose Zone: Macraes Mining Zone	SPZMM-R20 Mining Activities Special Purpose Zone - Macraes Mining – Potential Mining Ar	Oppose	Opposes in part. onsiders that the rules do not adequately manage effects on sensitive environments or address contaminant discharge risks. The submitter seeks amendments to include broader matters of discretion and ensure rehabilitation requirements match those in other zones. [refer to original submission for full reasons]	Seeks to amend SPZMM-R20(7) and add a new matter of discretion as follows: adverse effects on, and measures to maintain indigenous biodiversity, landscape, natural features, natural character, heritage and cultural values; and x. Measures to avoid generation of contaminant discharges to waterways; Seeks to amend SPZMM-R18(6) to include reference to EW(M) – APP1.	Accept in part
295.42	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R20 Mining Activities Special Purpose Zone - Macraes Mining – Potential Mining Ar	Oppose	Considers that some new mining activities should be permitted in the Potential Mining Area and considers that it may be appropriate for some new mining activities to require resource consent and proposes a new suite of rules which address its concerns [refer to prior submission points].	Seeks to delete the rule and replace with new rules for mining activities outlined above [refer to previous submission points].	Reject
310.74	Graymont (NZ) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R20 Mining Activities Special Purpose Zone - Macraes Mining – Potential Mining Ar	Amend	Supports the recognition of Macraes goldmine as New Zealand's largest, noting its significant economic, cultural, and social benefits and endorses the Special Purpose Zone – Macraes Mining and that its less restrictive rules are appropriate and consistent with other districts. Considers that the PDP should better recognise the benefits of mining and quarrying activities throughout the district, as these are essential for regional and national development.	Seeks for greater recognition to quarrying, mining and mineral processing activities as a whole, and the benefits to be brought about by the same, as identified in the other sections of this submission and that similar provisions to those in the SPZMM should be included in the proposed Plan with regard to quarrying.	Reject
251.380	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Special Purpose Zone: Macraes Mining Zone	SPZMM-R21 Rural Industry Special Purpose Zone - Macraes Mining Activity status: Res	Oppose	Opposes in part. Considers that current matters for discretion fail to account for effects on sensitive environments and cultural values.	Seeks to add a new matter of discretion as follows: x. Adverse effects on the values of sensitive environments and on cultural values;	Accept
295.43	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R21 Rural Industry Special Purpose Zone - Macraes Mining Activity status: Res	Amend	Considers that clarification is needed that the rule applies only to rural industry activities not connected to mining, as it considers mining-related activities to fall within the definition of "mining activities."	Seeks to amend as follows: SPZMM-R21 Rural Industry not associated with mining Special Purpose Zone - Macraes Mining	Accept
295.44	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R22 Any other activity not provided for as a permitted, controlled, restricted discretio	Support	Supports retention of a discretionary activity status in particular for mining activities that are not otherwise provided for by rules with a permitted, controlled or restricted discretionary activity status.	Seeks to retain as notified.	Accept
295.45	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R23 Retirement village Special Purpose	Amend	Supports the rule but notes there may also be other sensitive activities that need to be similarly assessed as a non-	Seeks to include other sensitive activities in this non-complying rule for the SPZMM.	Reject

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
			Zone - Macraes Mining Activity status: N		complying activity for this zone (e.g. residential activities, hospitals, visitor accommodation, etc).		
242.81	Ministry of Education Te Tāhuhu o Te Mātauranga	Special Purpose Zone: Macraes Mining Zone	SPZMM-R24 Educational facility Special Purpose Zone - Macraes Mining Activity status:	Support	Seeks that educational facilities are provided for in the Special Purpose Zone – Macraes Mining as a discretionary activity. Considers that educational facilities are essential social infrastructure that may need to be located within this zone, noting educational activities extend beyond typical schools. Seeks a change in the activity status to discretionary to provide flexibility without unreasonable restrictions for education facilities that may be best placed to serve the education needs of the Special Purpose Zone - Macraes Mining.	Seeks to amend as follows: Educational Facility Activity status: ~~Non-Complying~~Discretionary Activity status when compliance is not achieved: Not Applicable	Reject
295.46	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R24 Educational facility Special Purpose Zone - Macraes Mining Activity status:	Amend	Supports the rule's intent but seeks clarification to ensure onsite training activities, which it considers part of "mining activities," are not mistakenly classified as "education facilities" and rendered non-complying.	Seek to ensure that this rule does not inadvertently capture education and training activities undertaken by OceanaGold as part of operating mining activities within the zone.	Accept and clarified in body of report.
295.16	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R3 Exploration Special Purpose Zone - Macraes Mining - Existing Mining Area Acti	Support	Considers that exploration is appropriate to occur as a permitted activity not subject to standards within the Existing Mining Area.	Retain as notified.	Accept
310.71	Graymont (NZ) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R3 Exploration Special Purpose Zone - Macraes Mining - Existing Mining Area Acti	Amend	Supports the recognition of Macraes goldmine as New Zealand's largest, noting its significant economic, cultural, and social benefits and endorses the Special Purpose Zone – Macraes Mining and that its less restrictive rules are appropriate and consistent with other districts. Considers that the PDP should better recognise the benefits of mining and quarrying activities throughout the district, as these are essential for regional and national development.	Seeks for greater recognition to quarrying, mining and mineral processing activities as a whole, and the benefits to be brought about by the same, as identified in the other sections of this submission and that similar provisions to those in the SPZMM should be included in the proposed Plan with regard to quarrying.	Reject
251.374	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Special Purpose Zone: Macraes Mining Zone	SPZMM-R4 Primary production activities (excluding carbon forestry otherwise provided for in SP	Amend	Considers the rule title could be clearer regarding carbon forestry as it implies that carbon forestry that doesn't meet GRUZ-R18 requirements is a permitted activity.	Seeks to amend as follows: Primary production (excluding carbon forestry ~~otherwise provided for in SPZMM-R17~~, mining activity, quarrying activities, intensive indoor primary production and intensive outdoor primary production)	Accept
295.27	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R4 Primary production activities (excluding carbon forestry otherwise provided for in SP	Support	Support for the rule. No specific reasons given.	Retain as notified	Accept except as modified by other submissions.
295.28	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R6 Residential activity Special Purpose Zone - Macraes Mining Activity status:	Oppose	Considers residential activities inappropriate as permitted uses in the SPZMM, as they conflict with the zone's purpose and risk reverse sensitivity. Temporary worker accommodation may be needed but would fall under "mining activities" and not rely on this rule.	Seeks to delete the rule.	Reject
295.29	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R7 Residential unit Special Purpose Zone - Macraes Mining Activity status: Perm	Oppose	Consider it inappropriate to permit residential activities in the SPZMM as this could lead to reverse sensitivity effects.	Seeks to delete the rule.	Reject

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
295.30	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R8 Accessory building Special Purpose Zone - Macraes Mining Activity status: Pe	Support	Support for the rule. No specific reasons given.	Retain as notified.	Accept
295.31	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	SPZMM-R9 Minor residential unit Special Purpose Zone - Macraes Mining Activity status	Oppose	Does not support the establishment of residential units within the zone as this could lead to reverse sensitivity effects.	Seeks to delete the rule.	Reject
295.2	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	The Potential Mining Area refers to land within the Zone that has not been mined or been subject to	Amend	Supports retaining the Special Purpose Zone Macraes Mining in the PDP with amendments as it appropriately enables mining activities that deliver economic, social, and cultural benefits to the district and region.	Seeks to amend as follows: ...There are early mining features with historic heritage values within this area as well as areas of indigenous vegetation and habitat for indigenous fauna which are likely to be considered of ~~considerable~~ value.	Accept
295.1	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	The Zone is made up of two areas, an 'Existing Mining Area' and a 'Potential Mining Area'. The Exist	Amend	Supports retaining the Special Purpose Zone Macraes Mining in the PDP with amendments as it appropriately enables mining activities that deliver economic, social, and cultural benefits to the district and region.	Seeks to amend as follows: The Zone includes land that is owned by OceanaGold, land over which OceanaGold has rights to minerals, land that is covered by minerals permits issued by the government and held by OceanaGold, or by resource consents held by OceanaGold for mining or mining related activities. The Zone is ~~made up of~~ divided into two areas, an 'Existing Mining Area' and a 'Potential Mining Area'. The Existing Mining Area refers to land that has either received resource consents (previous or current) for mining-related proposals or ~~and~~ has been the subject of disturbance during the excavation of pits, the construction of waste rock stacks, the construction of haul roads and other tracks, the construction of the gold processing plant as well as other ancillary infrastructure, and underground mining. Land that has been rehabilitated is farmed under lease and there are a number of covenants that have been put in place elsewhere, as a means to offset the loss of indigenous vegetation and habitat considered to be of value or to protect historic heritage.	Accept
295.3	OceanaGold (New Zealand) Limited	Special Purpose Zone: Macraes Mining Zone	User Notes: For some activities, a resource consent may be required by rules in more than one ch	Amend	Opposes provisions that unnecessarily restrict access to the mineral resource in the Special Purpose Zone - Macraes Mining and supports treating it as a standalone zone that clearly identifies all relevant consent requirements, ensuring mining is not limited by generic provisions. District-wide rules should only apply in limited cases and must align with the zone's objectives and policies.	Seeks to amend as follows: The Special Purpose Zone: Macraes Mining is a "stand-alone" zone that recognises the economic, cultural and social benefits of accessing the significant mineral resource in the Hyde-Macraes Shear Zone and provides for the continuation of mining within the Zone. In that regard, the Special Purpose Zone: Macraes Mining provisions identify all the relevant consent requirements and standards applicable to mining activities within the zone to ensure that mining activity explicitly provided for and enabled by the zone is not precluded by other, unrelated provisions that have not been developed in the context of allowing for mining activities to occur as intended within the Zone. District wide provisions only apply to non-mining related activities in the Zone and only apply in the context of the objectives and policies relevant to the Special Purpose Zone: Macraes Mining. For some non-mining activities, a resource consent may be required by rules in more than one chapter in the District Plan. Plan users are encouraged to check all District-Wide Matters chapters. ... For new buildings or structures unrelated to mining activities, other relevant rules may include (but not limited to) the following; ...	Reject

Planning Maps

Sub	Submitter	Section	Provision	Position	Summary of Submission	Relief/Decision Sought Summary	Recommendation
295.48	OceanaGold (New Zealand) Limited	Relationship Between Spatial Layers	Overlays are applied to areas which have specific values or risks that need to be managed carefully.	Amend	Supports the overlay guidance but believes the SPZMM should remain free of overlays unless they are clearly justified both environmentally and economically, to preserve the zone's enabling intent.	Seeks to delete any overlays affecting the SPZMM, unless they can be sufficiently justified from both an environmental and economic position, such that their retention is appropriate in accordance with Section 32 of the RMA.	Reject
251.367	Te Rūnanga o Waihao, Te Rūnanga o Moeraki and Kāti Huirapa Rūnaka ki Puketeraki	Planning Maps	General	Oppose	Opposes in part. Considers that mapped mining zones include land without a minerals permit, which is inappropriate. The submitter seeks removal of areas lacking permits from the identified zone. [refer to original submission for full reasons]	Seeks to exclude areas for which there is no minerals permit.	Reject
295.231	OceanaGold (New Zealand) Limited	Planning Maps	General	Amend	Considers that the SPZMM should include all of the following land in the vicinity of the Hyde-Macraes Shear Zone: - Land that is owned by OceanaGold; - Land that is covered by minerals permits issued by the government and held by OceanaGold; - Land that is covered by resource consents held by OceanaGold for mining or mining related activities; and - Land over which OceanaGold holds the rights to minerals. Annexure 1 to this submission indicatively illustrates the extent of such land [refer to original submission].	Seeks to retain the maps relating to the SPZMM subject to amending the boundary of the zone to that indicatively illustrated in Annexure 1 to this submission [refer to original submission].	Accept

Appendix 3
Submissions on Withdrawn Provisions

Special Purpose Zone Macraes Mining

No provisions were fully withdrawn from the Special Purpose Zone Macraes Mining. Therefore, there are no submissions on withdrawn provisions relating to this topic.