

Submitted to Fast-track approval applications
Submitted on 2024-05-03 15:03:18

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
Hawkeswood Mining Limited

2 Contact person

Contact person name:
Anita Collie

3 What is your job title

Job title:
Principal Planner

4 What is your contact email address?

Email:
s 9(2)(a)

5 What is your phone number?

Phone number:
s 9(2)(a)

6 What is your postal address?

Postal address:

Town Planning Group
Level 1, 100 Victoria Street
Christchurch 8013

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

1346 - 1536 Teviot Road, Millers Flat, Central Otago.

File upload:
Site Location.png was uploaded

Upload file here:

Site Extent.png was uploaded

Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

Record of Titles.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

Jacks Ridge Limited
Alan Thomas Parker,
Georgia Rose Parker and Matthew Ross Hunter,
Central Otago District Council,
Gareth David Wilson and Gabrielle Claire Campbell-Lloyd, and
Laurie Allan Crawford and Pamela Fay Crawford.

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

Jacks Ridge Limited is a company affiliated with the Applicant, and owns some of the land within the mine footprint. Access agreements are in place with all other owners of land within the mine footprint. The Applicant has full access to the project area.

Section 2: Project details

What is the project name?

Please write your answer here:

Millers Flat Alluvial Gold Mine

What is the project summary?

Please write your answer here:

The Applicant proposes to establish an alluvial gold mine on the site, including on-site processing, and stockpiling of overburden. Approximately s 9(2)(b)(ii) of gold will be mined over 8 years whilst employing up to 30 people. The proposal will have significant regional benefits.

What are the project details?

Please write your answer here:

The Applicant proposes to establish an alluvial gold mine on the site with on-site processing. Up to 30 staff will be employed on the project, including machinery operators, mechanics and engineers. The mine covers an area of approximately 68 ha in area and it is expected that approximately s 9(2)(b)(iii) of gold will be extracted over the life of the mine.

Overburden will be removed with excavators and dump trucks and stockpiled on site. Some of the overburden will be used to form bunds around the site perimeter during the operational phase of mining. Topsoil will be stockpiled separately for rehabilitation purposes and grassed to prevent erosion

The depth of excavation varies across the site, with the base of the gold bearing wash layer being located approximately 13m to 18m below ground level. Earthworks will be below the natural groundwater level and the mine pit will be partially dewatered to allow access to the resource.

The gold bearing wash will be processed on site using gravity separation methods. . The Gold Recovery Plant will be located within the active mine pit, on a floating dredge. Tailings comprising non-gold bearing on-site material (e.g., rock, silts etc.) will be replaced in the mine pit. No chemical methods will be used for gold extraction.

A range of mitigation measures have been developed to ensure that adverse effects are managed throughout the life of the mine, with a rehabilitation programme to ensure that the end outcome results in an appropriate outcome for the environment and community. The site will be fully rehabilitated back to agricultural land use on completion of mining.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

The project is shovel-ready insofar that site establishment works have commenced as part of the exploration phase of the project. The project will likely progress in 4 stages, though the each stage will progress while the previous is under rehabilitation due to the moving mine cell methodology. The staging plan is as follows:

Stage 1 - 5.4 ha - This stage can commence once permits are obtained.
Stage 2 - 17.4 ha
Stage 3 - 29.1 ha
Stage 4 - 16.3 ha This stage will be complete within 8 years of commencement.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource Consents under the Resource Management Act 1991. Resource consents are required for:

- Land use consent (s9) for temporary buildings, storage areas and stockpiles, tracks, earthworks, hazardous substance storage, vehicle access and activity involving more than 3 persons.
- Land use consent (s9) under the NESCS.
- Land use consent (s13) for a bore (the mine pit is classified as a bore)
- Water Permit for take and use of water for dewatering, dust control and irrigation (for rehabilitation)
- Discharge Permit to discharge water and contaminants (sediment) to land from settlement ponds.
- Discharge Permit to discharge dust to air from processing of gold-bearing material.

Archaeological Authority under the Heritage New Zealand Pouhere Taonga Act 2014

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Central Otago District Council and Otago Regional Council

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

The Applicant has lodged applications as listed above with Central Otago District Council and Otago Regional Council. They acknowledge this application must be withdrawn to proceed with the fast track process.

A application for an Archaeological Authority has also been lodged. It is acknowledged that this must also be withdrawn to proceed with the fast track process.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

Access agreements are in place with all other owners of land within the mine footprint. The Applicant has full access to the project area.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

The project is ready to commence and is fully funded. A site office and ancillary facilities have been partly established during the exploration phase of the project. No detailed design is necessary as all feasibility studies have been completed. A mining permit has been granted for this project under the Crown Minerals Act. The critical milestone that is needed is resource consent approval.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Central Otago District Council
Otago Regional Council
Kāti Huirapa Rūnaka ki Puketeraki
Te Rūnanga o Ōtākou
Hokonui Rūnanga
Te Rūnanga o Ngāi Tahu
Land owners
Neighbouring bore owners
Clutha Gold Charitable Trust
Millers Flat Water Company

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Central Otago District Council - Consultation has been completed with the property arm of Council. An access agreement is in place and the Council have provided RMA written approval. Various discussions have occurred with Council planning staff.

Otago Regional Council - Various discussions have occurred with Council planning staff. There are no major technical concerns with the project that cannot be addressed by conditions of consent.

Landowners - Access agreements are in place with all land owners in the mining footprint.

Neighbours - the Applicant has had multiple conversations with all neighbours. In total, 23 RMA written approvals have been provided to CODC.

Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnanga (collectively Kā Rūnaka) have been consulted and have highlighted that activities including mining and earthworks can be a threat to the values of the wāhi tūpuna landscape and their relationship with the Mata-au. The Applicant has acknowledged this as part of the proposal and sought to protect cultural values, including providing for test trenching to identify any unknown Māori archaeological sites prior to earthworks, consultation regarding works and rehabilitation, ensuring works are set back from the Mata-au and Tima Burn, and providing for augmentation of the Tima Burn during dewatering. Consultation has involved two online meetings, two in-person hui and a significant amount of email correspondence.

Te Rūnanga o Ngāi Tahu - have directed consultation to occur through Aukaha, which is the organisation who represent Kā Rūnaka. Details of this consultation is as above.

Neighbouring bore owners - Consultation with with potentially affect bore owners has been undertaken, RMA written approvals (to ORC) have been provided by all but one potentially affected bore owner. Mitigation has been proposed in the form of providing bore owners with an alternative water supply, should their existing supply bore be affected by dewatering. This is acceptable to ORC and all but one of the bore owners.

Clutha Gold Charitable Trust - The Applicant has entered into a private agreement with the Trust for the diversion and remediation of the Clutha Gold cycle trail. The Trust have provided their written approval to the project.

Millers Flat Water Company - as the project may impact infrastructure managed by this organisation, a private agreement has been completed detailing the management of water infrastructure.

Upload file here:

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

Not Applicable.

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The Clutha River / Mata-au is located to the west and southwest of the site. The river is a Statutory Acknowledgement Area under the Ngāi Tahu Claims Settlement Act 1998.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

N/A

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Kā Rūnaka identify that the Mata-au and Tima Burn are part of an integrated ancestral landscape (wāhi tūpuna) and that draft mapping has been completed. This information is not available to the public and has not been shared with the Applicant.

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

N/A

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

Yes

If yes, please explain:

There are no protected customary rights over the affected land.

Upload your assessment if necessary:

No file uploaded

Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

Adverse effects are described in the attached document.

Upload file:

Effects Assessment.pdf was uploaded

Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

The National Policy Statement for Freshwater Management 2020 (NPS-FM) is relevant. Overall, the project is considered to be consistent with the NPS-FM. Please see attached for a detailed assessment.

The National Policy Statement for Highly Productive Land 2022 (NPS-HPL) is not relevant to this project. Reasons are explained in the attached assessment document.

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS) and the National Environmental Standard for Freshwater (NES-F) are relevant to the proposal. Consent is required under the NES-CS, with details in the attached assessment.

No other National Environmental Standards are relevant in respect of this proposal.

File upload:

NPS and NES Assessment.pdf was uploaded

Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

Without the fast-track approval process, the current resource consent applications will go to a joint Council hearing in May 2024. That decision could be appealed to the Environment Court. It is possible that it could take another 2 years for a final decision to be made. The project has already taken around 2 years to get to this point. The financial cost (in terms of delays, holding costs and consenting) are significant and will be detrimental to the project following a conventional planning process. The fast-track process is critical to ensuring an efficient outcome that can lead to the benefits of the proposal being realised as quickly as possible.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

All the project documentation is complete and ready to advance into the fast-track process, and is ready for a panel to make a decision on it. It will not adversely affect the efficient operation of the fast-track process and will represent a 'shovel-ready' project that neatly falls under Schedule 2A.

Has the project been identified as a priority project in a:

Not Answered

Please explain your answer here:

The project is not identified as a priority project.

Will the project deliver regionally or nationally significant infrastructure?

Not Answered

Please explain your answer here:

Whilst the project is not infrastructure it will bring regionally significant revenue into the local economy as described above.

Will the project:

Please explain your answer here:

The project is not related to housing.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The project is expected to employ 20 - 25 full time employment opportunities on site at Millers Flat, with a further 8-10 off site and subcontractor positions. The Applicant expects to fill 90% of the employment positions from the local and wider Millers Flat community.

At current gold prices and salary rates, the Applicant expects to introduce over \$90 million to the wider economy over the life of the mine with approximately \$28 million in local employment remuneration and royalty payments.

The Applicant will use the services of the following local providers: Accommodation, restaurant and catering, printing and stationary supplies, mechanical and engineering, hydraulic hose repair, electrical, auto electrical, irrigation, fencing, drilling experts, tyre fitters, steel work fabrications, conveyer belt specialists, fuel and oil suppliers, and engineering suppliers.

These factors contribute to the regional significance of the project, noting that its potential benefits extend past just the significant economic value it will bring the region.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

The project land will be rehabilitated and restored to agricultural use post-mining.

Will the project support development of natural resources, including minerals and petroleum?

Yes

Please explain your answer here:

The project involves the mining of alluvial gold, with significant resources being extracted. The project contributes to the development of natural resources.

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

The operation is designed to be a low-emissions project, utilising modern machinery. Plant will be electrified from Stages 2-4, minimising emission of greenhouse gases.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

Natural hazards have limited relevance to this project. A very small part of the site is located within an area subject to flood hazard, however expert advice is that the mine pit will attenuate flood flows, contributing to a very small reduction in flood risk during operation of the mine.

Will the project address significant environmental issues?

No

Please explain your answer here:

Gold is a natural resource with high value. While leaving it in-situ would have no environment effect, it is a resource that has benefits with its extraction, as set out above. The project is not seeking to address significant environmental issues - however, all adverse effects of the project will be avoided, mitigated or remedied on site rehabilitation.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

The proposal is consistent with all local and regional planning documents including:

Otago Regional Policy Statement 2019: The objectives and policies under consideration aim to promote the sustainable use of resources while ensuring economic, social, and cultural wellbeing, including the protection of Kāi Tahu values and human health. The Applicant has made efforts to respect these values and mitigate environmental impacts, with measures in place for dust management, soil protection, and maintaining indigenous biodiversity. Additionally, the proposal maintains public access to waterbodies, supports mineral extraction in rural areas, and addresses the need to minimise adverse effects on the environment and community health. The project is not located in sensitive areas, avoids significant community health impacts, and employs a precautionary approach, ensuring that the development is consistent with the principles of sustainable management and environmental stewardship.

Proposed Otago Regional Policy Statement 2021: The proposal protects the Clutha River's values, ensures soil's life-supporting capacity through topsoil management and land rehabilitation, maintains public access during mining, and is overall consistent with the PORPS objectives and policies.

Central Otago District Plan: The District Plan's objectives focus on community wellbeing, environmental quality, landscape values, and the preservation of natural features. The proposal is seen as consistent with these objectives, ensuring the maintenance of landscape values and soil resources, protection of rural amenity, and safe roading networks. It also aligns with policies for the conservation of archaeological sites, requiring that any potential effects on these sites are mitigated. Furthermore, the activity does not exacerbate existing hazards. Overall, the proposal is consistent with the District Plan.

Otago Regional Plan: Water: The project is consistent with regional groundwater management objectives and policies by ensuring sustainable use and quality maintenance of groundwater resources, preventing soil degradation from poor quality water, and respecting cultural values, particularly of Kāi Tahu. It prioritizes avoiding long-term environmental impacts, aligns with policies for responsible bore management to prevent aquifer contamination, and supports local economic and social wellbeing. The project's temporary nature, commitment to land rehabilitation, and environmental monitoring demonstrate its harmony with the objectives and policies, ensuring minimal adverse effects and preservation of valued natural and cultural resources.

Otago Regional Plan: Air: The objectives and policies for air quality management in Otago aim to preserve high air quality, enhance degraded areas, and prevent adverse effects on health, ecosystems, and cultural values. Sustainable use of the air resource is encouraged, with special consideration for Kāi Tahu's relationship with the air. The proposed mining project is temporary, with land rehabilitation planned post-mining. Dust from the 'wet' gold recovery process and earthworks will be managed, ensuring minor environmental impact, and the project will contribute to the local community's economic and social wellbeing, aligning with the set objectives and policies.

Anything else?

Please write your answer here:

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

The project does not contain any aspect referred to in the ineligible project list.

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

Natural hazards have limited relevance to this project. A very small part of the site is located within an area subject to flood hazard, however expert advice is that the mine pit will attenuate flood flows, contributing to a very small reduction in flood risk during operation of the mine. The project will not be affected by climate change.

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

The Applicant has been served with two abatement notices.

CODC Abatement notice AN0007 dated 6 June 2023. This relates to a test pit undertaken for exploration purposes. The alleged non-compliances are:

- Earthworks exceeding District Plan Standards - the Applicant accepts this and notes that the exceedance was unintentional and works ceased as soon as the Council advised of the non-compliance.
- Exceedance of scale of activity controls, more than 3 people on site. The Applicant does not agree with this assessment.
- Tracks constructed not in accordance with District Plan specifications. The Applicant agrees that tracks internal to the site may not meet the standards, by virtue of their temporary nature.

These matters are to be addressed by way of resource consents for the site.

CODC Abatement Notice AN0013 dated 20 February 2024. This relates to the operation of a greenwaste recycling facility on site. The Applicant contacted Council to ascertain if such an activity was permitted and Council issued the Abatement Notice. The Applicant clarified that the activity did not take place and the enquiry was of a preliminary nature. Council declined to withdraw the abatement notice. The Applicant chose not to contest this as it considered the dispute was not worth the time and cost.

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Anita Collie

Important notes