

Application Form for a Resource Consent

50 The Octagon, PO Box 5045
Dunedin 9054, New Zealand
Ph 03 477 4000 | www.dunedin.govt.nz

PLEASE FILL IN ALL THE FIELDS

Application details

I/We Oceana Gold (New Zealand) Ltd (must be the FULL name(s) of an individual or an entity registered with the New Zealand Companies Office. Family Trust names and unofficial trading names are not acceptable: in those situations, use the trustee(s) and director(s) names instead) hereby apply for:

☒ Land Use Consent ☐ Subdivision Consent

I opt out/do not opt out (delete one) of the fast-track consent process (only applies to controlled activities under the district plan, where an electronic address for service is provided)

Brief description of the proposed activity: see attached Assessment of Environmental Effects

Have you applied for a Building Consent? ☐ Yes, Building Consent Number ABA _____ ☐ No

Site location/description

I am/We are the: ☒ owner ☐ occupier ☐ lessee ☐ prospective purchaser of the site (tick one)

Street Address of Site: _____

Legal Description: _____

Certificate of Title: _____

Contact details

Name: Gavin Lee (applicant/agent (delete one))

Address: 22 MacLaggan Street, Dunedin Postcode: 9016

Phone (daytime): 03 479 4700 Email: gavin.lee@oceanagold.com

Chosen contact method (this will be the first point of contact for all communications for this application)

I wish the following to be used as the address for service: ☒ email ☐ post ☐ other _____ (tick one)

Address for invoices or refunds (if different from above)

Name: _____

Address: _____

Ownership of the site

Who is the current owner of the site? Oceana Gold (New Zealand) Ltd

If the applicant is not the site owner, please provide the site owner's contact details:

Address: _____ Postcode: _____

Phone (daytime): _____ Email: _____

Occupation of the site

Please list the full name and address of each occupier of the site: _____

See attached Assessment of ENVIRONMENTAL AFFECTS

Monitoring of your Resource Consent

To assist with setting a date for monitoring, please estimate the date of completion of the work for which Resource Consent is required. Your Resource Consent may be monitored for compliance with any conditions at the completion of the work. (If you do not specify an estimated time for completion, your Resource Consent, if granted, may be monitored three years from the decision date).

Annually

(month and year)

Monitoring is an additional cost over and above consent processing. You may be charged at the time of the consent being issued or at the time monitoring occurs. Please refer to City Planning's Schedule of Fees for the current monitoring fee.

Detailed description of proposed activity

Please describe the proposed activity for the site, giving as much detail as possible. Where relevant, discuss the bulk and location of buildings, parking provision, traffic movements, manoeuvring, noise generation, signage, hours of operation, number of people on-site, number of visitors etc. Please provide proposed site plans and elevations.

See attached Assessment of ENVIRONMENTAL EFFECTS

Description of site and existing activity

Please describe the existing site, its size, location, orientation and slope. Describe the current usage and type of activity being carried out on the site. Where relevant, discuss the bulk and location of buildings, parking provision, traffic movements, manoeuvring, noise generation, signage, hours of operation, number of people on-site, number of visitors etc. Please also provide plans of the existing site and buildings. Photographs may help.

See Attached Assessment of Environmental Effects

(Attach separate sheets if necessary)

District plan zoning

What is the District Plan zoning of the site? Rural Scenic

Are there any overlaying District Plan requirements that apply to the site e.g. in a Landscape Management Area, in a Townscape or Heritage Precinct, Scheduled Buildings on-site etc? If unsure, please check with City Planning staff.

Breaches of district plan rules

Please detail the rules that will be breached by the proposed activity on the site (if any). Also detail the degree of those breaches. In most circumstances, the only rules you need to consider are the rules from the zone in which your proposal is located. However, you need to remember to consider not just the Zone rules but also the Special Provisions rules that apply to the activity. If unsure, please check with City Planning staff or the Council website.

See attached ASSESSMENT OF ENVIRONMENTAL EFFECTS

Affected persons' approvals

I/We have obtained the written approval of the following people/organisations and they have signed the plans of the proposal:

Name: See Attached assessment of ENVIRONMENTAL EFFECTS

Address:

Name:

Address:

Please note: You must submit the completed written approval form(s), and any plans signed by affected persons, with this application, unless it is a fully notified application in which case affected persons' approvals need not be provided with the application. If a written approval is required, but not obtained from an affected person, it is likely that the application will be fully notified or limited notified.

Assessment of Effects on Environment (AEE)

In this section you need to consider what effects your proposal will have on the environment. You should discuss all actual and potential effects on the environment arising from this proposal. The amount of detail provided must reflect the nature and scale of the development and its likely effect. i.e. small effect equals small assessment.

You can refer to the Council's relevant checklist and brochure on preparing this assessment. If needed there is the Ministry for the Environment's publication "A Guide to Preparing a Basic Assessment of Environmental Effects" available on www.mfe.govt.nz. Schedule 4 of the Resource Management Act 1991(RMA) provides some guidance as to what to include.

See attached Assessment of ENVIRONMENTAL EFFECTS

(Attach separate sheets if necessary)

The following additional Resource Consents from the Otago Regional Council are required and have/have not (delete one) been applied for:

☐ Water Permit ☐ Discharge Permit ☐ Coastal Permit ☐ Land Use Consent for certain uses of lake beds and rivers ☒ Not applicable

Declaration

I certify that, to the best of my knowledge and belief, the information given in this application is true and correct.

I accept that I have a legal obligation to comply with any conditions imposed on the Resource Consent should this application be approved.

Subject to my/our rights under section 357B and 358 of the RMA to object to any costs, I agree to pay all the fees and charges levied by the Dunedin City Council for processing this application, including a further account if the cost of processing the application exceeds the deposit paid.

Signature of Applicant/Agent (delete one):



Date:

1/2/19

Privacy – Local Government Official Information and Meetings Act 1987

You should be aware that this document becomes a public record once submitted. Under the above Act, anyone can request to see copies of applications lodged with the Council. The Council is obliged to make available the information requested unless there are grounds under the above Act that justify withholding it. While you may request that it be withheld, the Council will make a decision following consultation with you. If the Council decides to withhold an application, or part of it, that decision can be reviewed by the Office of the Ombudsmen.

Please advise if you consider it necessary to withhold your application, or parts of it, from any persons (including the media) to (tick those that apply):

- ☐ Avoid unreasonably prejudicing your commercial position
- ☐ Protect information you have supplied to Council in confidence
- ☐ Avoid serious offence to tikanga Maori or disclosing location of waahi tapu

What happens when further information is required?

If an application is not in the required form, or does not include adequate information, the Council may reject the application, pursuant to section 88 of the RMA. In addition (section 92 RMA) the Council can request further information from an applicant at any stage through the process where it may help to a better understanding of the nature of the activity, the effects it may have on the environment, or the ways in which adverse effects may be mitigated. The more complete the information provided with the application, the less costly and more quickly a decision will be reached.

Fees

Council recovers all actual and reasonable costs of processing your application. Most applications require a deposit and costs above this deposit will be recovered. A current fees schedule is available on www.dunedin.govt.nz or from Planning staff. Planning staff also have information on the actual cost of applications that have been processed. This can also be viewed on the Council website.

Development contributions

Your application may also be required to pay development contributions under the Council's Development Contributions Policy. For more information please ring 477 4000 and ask to speak to the Development Contributions Officer, or email developmentcontributions@dcc.govt.nz.

Further assistance

Please discuss your proposal with us if you require any further help with preparing your application. The Council does provide pre-application meetings without charge to assist in understanding the issues associated with your proposal and completing your application. This service is there to help you.

Please note that we are able to provide you with planning information but we cannot prepare the application for you. You may need to discuss your application with an independent planning consultant if you need further planning advice.

City Planning Staff can be contacted as follows:

- In Writing: Dunedin City Council, PO Box 5045, Dunedin 9054
- In Person: Customer Services Centre, Ground Floor, Civic Centre, 50 The Octagon
- By Phone: (03) 477 4000
- By Email: planning@dcc.govt.nz

There is also information on our website at www.dunedin.govt.nz.

Information requirements

- ☒ Completed and Signed Application Form
- ☒ Description of Activity and Assessment of Effects
- ☒ Site Plan, Floor Plan and Elevations (where relevant)
- ☒ Certificate of Title (less than 3 months old) including any relevant restrictions (such as consent notices, covenants, encumbrances, building line restrictions)
- ☐ Written Approvals
- ☐ Forms and plans and any other relevant documentation signed and dated by Affected Persons
- ☐ Application Fee (cash, cheque or EFTPOS only; no Credit Cards accepted)
- ☐ Bank account details for refunds

In addition, subdivision applications also need the following information

- ☐ Number of existing lots.
- ☐ Number of proposed lots.
- ☐ Total area of subdivision.
- ☐ The position of all new boundaries.

In order to ensure your application is not rejected or delayed through requests for further information, please make sure you have included all of the necessary information. A full list of the information required for resource consent applications is in the Information Requirements Section of the District Plan.

OFFICE USE ONLY

Has the application been completed appropriately (including necessary information and adequate assessment of effects)?

☐ Yes ☐ No

Application: ☐ Received ☐ Rejected

Received by: ☐ Counter ☐ Post ☐ Courier ☐ Other: _____

Comments: _____

(Include reasons for rejection and/or notes to handling officer)

Planning Officer: _____ Date: _____



Coronation North Extension

Assessment of Environmental Effects

Table of Contents

1	INTRODUCTION	6
1.1	Background and Site Description	6
1.2	Existing Consents	7
1.3	Project Description	8
2	LEGAL DESCRIPTION	13
3	ACTIVITY STATUS AND CONSENTS REQUIRING VARIATION	13
3.1	Otago Regional Council Consents	13
3.2	Dunedin City Council	14
3.3	Waitaki District Council	15
4	STATUTORY CONSIDERATIONS	16
4.1	Part II of the RMA	16
4.2	National Environmental Standards (NES)	19
4.3	National Policy Statement for Freshwater Management	19
4.4	Regional Policy Statement for Otago (RPS)	19
4.5	Regional Plan: Water for Otago (RPW)	22
4.6	Regional Plan: Air for Otago (RPA)	23
4.7	Dunedin District Plan	24
4.8	DCC Proposed 2GP	26
4.9	Waitaki District Plan	27
4.10	KTKO NRMP 2005	29
5	EXISTING ENVIRONMENT	30
6	ASSESSMENT OF ENVIRONMENTAL EFFECTS	31
6.1	Terrestrial Ecology	31
6.2	Aquatic Ecology	34
6.3	Geotechnical Assessment	35
6.4	Heritage and Archaeology	36
6.5	Amenity	36

6.6	Landscape and Visual.....	36
6.7	Hazardous Substances and HAIL.....	37
6.8	Effects on Tangata Whenua Values	37
7	PROPOSED MONITORING	39
8	ALTERNATIVES	40
9	AFFECTED PARTIES & CONSULTATION	41
9.1	Affected Parties	41
10	PROPOSED CONSENT CONDITIONS	43
10.1	Otago Regional Council.....	43
10.2	Dunedin City Council.....	43
10.3	Waitaki District Council	43
11	CONCLUSION.....	44

List of Figures

Figure 1-1 OceanaGold Macraes Minerals Permits	6
Figure 1-2 Coronation North Extension Project Elements	11
Figure 1-3 Consented and Proposed Consented Areas	12
Figure 6-1 Location of Trimbells WRS with respect to RAP	34
Figure 6-2 Affected & Avoided Streams in Trimbells Gully	35
Figure 6-3 Simulation of Coronation North Pit Extension from Longdale Road	37

List of Appendices

- Appendix A – *Terrestrial biodiversity of Coronation North Pit Extension, Trimbells WRS and impact of Extension and WRS* – ERA Ecology, DECEMBER 2018.**
- Appendix B – *Terrestrial biodiversity of Coronation North WRS give-up area – Coronation North Pit Extension Project* – ERA Ecology, DECEMBER 2018.**
- Appendix C – *Coronation North Project Consent Variation – Mining Footprint Amendment* – Ryder, AUGUST 2018.**
- Appendix D – *Geotechnical Reports* - Pells Sullivan Meynink**
- Appendix E - *Coronation North Extension Project - Landscape and Visual Effects* – WSP Opus, JANUARY 2019**

1 INTRODUCTION

1.1 Background and Site Description

Oceana Gold (New Zealand) Limited ("OceanaGold") is a significant multinational gold producer and New Zealand's largest producer of gold. OceanaGold's current operating assets in New Zealand consist of two large open pit mines (at Macraes in the South Island and at Waihi in the North Island), and four underground mines (Fraser's at Macraes, Favona, Trio and Correnso at Waihi). OceanaGold also has a large open pit mine at Reefton in the South Island which is currently in the closure phase and the company operates and owns a mine at Didipio in the Northern Philippines, and at Haile in South Carolina, United States of America.

The Macraes Gold Project (MGP) is located approximately 30 kilometres (km) to the northwest of Palmerston in the Otago Region of the South Island, New Zealand. The Macraes mining and exploration tenements cover a contiguous area of 15,705 hectares as shown in Figure 1-1. The mining operation is centred 1 to 2 km to the east of the Macraes township and is predominantly surrounded by farmland.

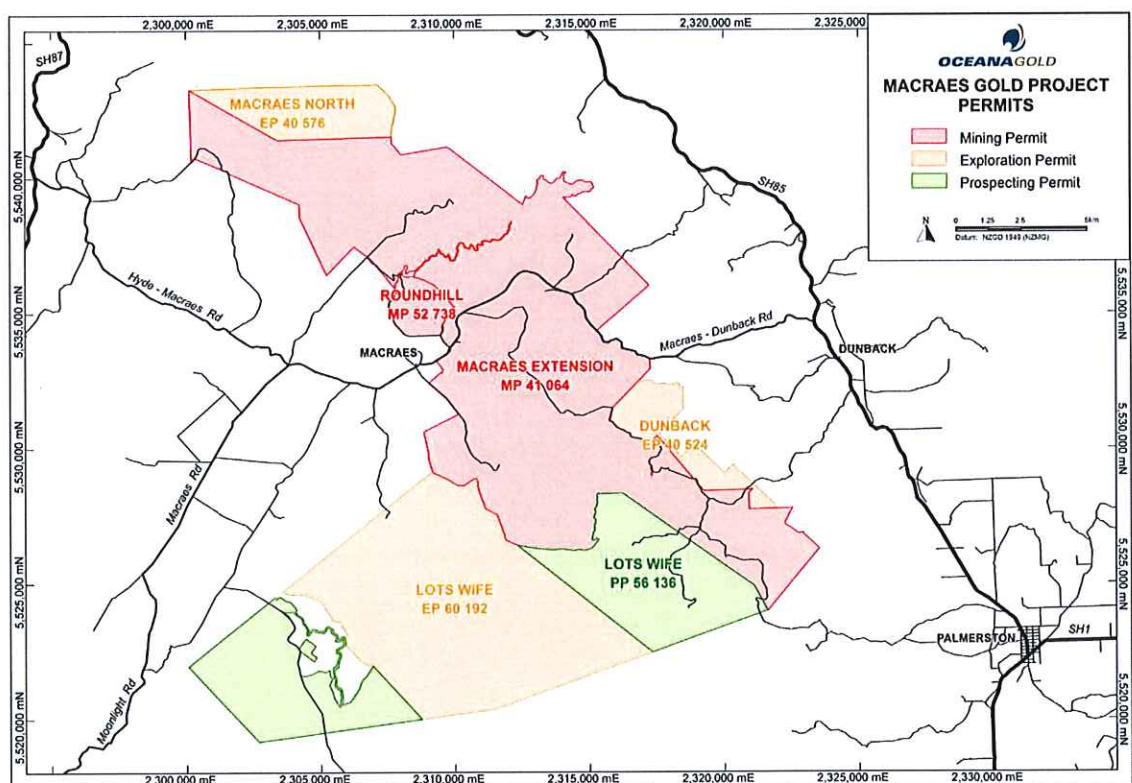


Figure 1-1 OceanaGold Macraes Minerals Permits

Presently, the company directly employs around 550 people at the Macraes site. The mine also provides significant additional job opportunities for contractors, with several contractors permanently based at the site and a large contractor workforce utilised during regular processing plant maintenance shutdown events.

The Macraes operation is the largest goldmine in New Zealand and since the commencement of operations over 4 million oz. of gold has been produced.

The Macraes operation was commissioned in 1990 following the construction of a gold processing plant to treat ore mined by open pit mining methods and has been operating continuously since that time, for over 27 years now. The processing plant had an original capacity of 1.5 million tonnes ("MT") per annum and

this has increased since 1990 through continual upgrades to approximately 5-6 MT of ore per annum. The Macraes operation processing plant recovers gold by concentrating the metal into a relatively small fraction of flotation concentrate, oxidising the reground concentrate in a pressure oxidation (POX) autoclave, washing the oxidised residue and then utilising a carbon-in-leach process to recover gold from the residue. Ore supply has been from a series of open pits combined with the Frasers underground mine that has been operating since 2006.

Ore supply is currently from the Frasers underground (commonly referred to as FRUG) and Coronation North Pit. The mining at Coronation North was consented in 2017 and extended the mining at the Coronation Pit and allowed for the creation of a new Coronation North pit and waste rock stack. A proposed extension to the Coronation North Pit now has the potential to be mined over the next year. The new consent seeks to gain regulatory approvals to extend this pit for the purpose of ongoing continuity of ore supply to the processing plant and allows for geotechnical mitigation on the existing Coronation North Pit. In addition to the proposed extension of the Coronation North Pit, a consent variation is being sort for the design of the Coronation North Waste Rock Stack which will limit the environmental footprint and avoid specific ecological values.

By way of background, the Coronation Project, within its original footprint, commenced at the beginning of 2015, so that its projected effects would have been expected to continue through to the end of 2017 at the latest.

The Coronation North and Coronation Pit Extension Project (Coronation North) project represented 12.5 MT of additional ore supply. The May 2016 AEE for Coronation North indicated that that project, in combination with underground ore and other ore sources, was expected to add about 3 further years of mining, on top of the existing Coronation mining operations. At the time of the Coronation North AEE submission Coronation was expected to finish by the end of 2016.

Ore delivery to the processing plant from the Coronation North began in earnest in October 2017, so based on the above estimated durations could be expected to continue until October 2020.

With the inclusion of the current Coronation North Extension project, the entire Coronation complex is estimated to have 9.8 MT of ore remaining. Mining at Coronation is forecast to take about 24.5 months from the end of October 2018 (just over 2 years of mining and hauling of ore), substantially consistent with the previously forecast completion date of October 2020. Notwithstanding the addition of Coronation North Extension mining and hauling of ore will add an additional four months to the approximate 3 year production window that was envisaged for the Coronation North Project and the overall 4-6 year production window that was approximated for the Coronation and Coronation North projects combined.

Relative to previously modelled ore extraction of 17.5 MT (Coronation and Coronation North combined) the Coronation North Extension project will take total actual ore extracted and hauled to 18.6M tonnes.

1.2 Existing Consents

OceanaGold was granted a suite of consents by the Otago Regional Council ("ORC"), the Dunedin City Council ("DCC") and the Waitaki District Council ("WDC") for the Coronation North Project in 2017. These consents were to expand the existing mining operations at the Coronation Project and to follow the line of strike further north to newly discovered mineral deposits.

The Coronation North Project consents authorised a new 63 hectare Coronation North Pit with an estimated 9 MT of ore, a 23 hectare extension to the Coronation Pit with an expansion of ore recovery from 5 MT to approximately 8.5 MT, a reduction of the consented Coronation Waste Rock Stack by about 64 hectares, a new Coronation North Waste Rock Stack of about 197 hectares, extension to the existing haul road and mining infrastructure at Coronation, and water takes for dust suppression and clean water diversion around the Coronation North mining operation. Consents were also issued for potential construction of a freshwater dam known as the Coal Creek Dam, with a footprint of about 9.3 hectares, to supplement natural low flow periods and dilute sulphate in discharged mine water.

The estimated duration of the operation and rehabilitation phases of the Coronation North Project was about 3 + 2 years, with about 3 years added to the overall Macraes mine life. This was in addition to the Coronation Project which had been expected to take about 3 years for operation and rehabilitation and add

1 year to the overall life of the operation. Accordingly, the combined schedule of operations for both projects was about 5-6 years plus rehabilitation.

The approved closure plan for Coronation and Coronation North Projects remains consistent with the consented approach that has been adopted throughout the operation. It provides for progressive rehabilitation of the waste rock stacks, opportunistic backfilling of the pits during operations, formation of pit lakes within both pits, removal of temporary structures and infrastructure, and decommissioning of silt ponds into stock water ponds.

1.3 Project Description

The Coronation North Extension Project is driven by several aspects, as follows:

- Successful exploration activity - OceanaGold has located an additional resource not previously identified at the time of consenting the previous project;
- Geotechnical constraints with pit wall stability in the Coronation North Pit; and
- Optimisation in design of waste rock movement from the Coronation North Pit and the Coronation Pit extension (consented as part of the Coronation North development) and subsequently waste rock stack design.

The overall effect of these aspects is to increase the volume of ore being excavated from the mining operation to:

- Extend the life of mining by approximately four months;
- Increase in unconsented area of 57.39ha, balanced by the set aside of 52.9ha of consented area resulting in a net increase/decrease of 4.49ha;
- Reduce effects (in almost all cases) to significant biodiversity values, when compared with the existing consented baseline;
- A reduction of visual effects when compared with the existing consented baseline; and
- Improve the safety of current operations and long-term stability of the pit walls.

The specific Project Elements of the Coronation North Extension are:

- Pit Cutback – Following more detailed exploration drilling and pit optimisation, approximately 2.8 MT of gold bearing ore have been identified close to the existing Coronation North Pit. It is proposed to extend the Coronation North Pit to the south east in order to access the underlying gold resources in an area partially consented for haul road and topsoil access. The cutback will result in approximately 28.8 MT (or 12.2 million m³). The additional area required for this cutback is 25.76ha;
- Pit Wall Stability Layback – As the Coronation North Pit has developed, greater knowledge and understanding of the underlying geology and pit wall behaviour has been gathered. In order to ensure the safe removal of ore from the Coronation North Pit, the pit wall is required to be laid back. This will result in approximately 14.12ha of additional unconsented area;
- Pit Backfill – the Pit Cutback will allow for approximately 19.3 MT (9.2 million m³) of waste rock to be placed at the north western end of the Coronation North Pit. The pit backfill will rise approximately 30m above the natural ground level on the north western side of the pit to an elevation of RL 640m;
- Trimbells Waste Rock Stack (Trimbells WRS) – detailed scheduling of waste movement has led to the design of Trimbells WRS, which is located high in the catchment of Trimbells Gully and partially covers Area B and Area C of the consented Coronation North WRS. Trimbells WRS requires an additional 17.51 ha of unconsented area and has a final elevation of RL 675m. The design of the Trimbells WRS as a replacement for the Area B and C of the consented Coronation North WRS has allowed for a significant area of consented land to be relinquished. The area equates to 52.9ha which has several benefits as outlined in the Section 6;

These Project Elements are shown in Figure 1-2, whilst the existing consented and proposed consented areas associated with these Project Elements are shown in Figure 1-3.

Mining of the Coronation North Pit and Pit Cutback will be conducted in conjunction with the Coronation Pit extension (consented as part of the Coronation North Project). Waste rock will be placed in the consented Coronation North WRS (Area A), Coronation North Pit Backfill, Coronation WRS and Trimbells WRS. A detailed materials balance of waste rock movement is summarised in the table Table 1 Waste Rock Materials Balance¹. The overall balance suggests net surplus of available volume of 3.6 million m³ (8.9 MT) in the designed waste rock storage. For the purposes of design and subsequently consenting it is preferable to take a more conservative approach to ensure suitable capacity of storage.

Table 1 Waste Rock Materials Balance

Source		Volume	Tonnes	Destination	Volume	Tonnes
Coronation Pit	North	7.7	15.6	Coronation North WRS	12.2	25.6
Coronation Pit Extension	North	12.6	26.2	Coronation WRS	2.1	4.4
Coronation Extension	Pit	16.9	35.0	Trimbells WRS	17.6	36.3
				Coronation North Pit Backfill	9.2	19.3
Total		37.2	76.8		41.1	85.6

In addition to the Project Elements the following measures will be taken as part of the good practice for environmental management at Macraes:

- Surface runoff will continue to be diverted around the open pit and WRS workings and managed with diversion drains and silt control dams located in gullies of disturbed areas, as is currently implemented. Any additional sediment control required will be installed prior to any additional disturbance within each catchment area;
- Surface and ground water collected within the pit will continue to be used for dust suppression activities onsite. This water will be utilised in the watercarts for keeping dust on the haul roads, WRS, and pit floors to a minimum;
- Discharges to air will continue to be managed by the operative Dust Management Plan. The plan includes methods which may be used to minimise dust generation. Dust and Total Suspended Particulate ("TSP") will continue to be monitored at existing monitoring sites;
- In preparation for excavation of the Coronation North Pit extension, Coronation Pit extension and Trimbells Gully WRS, topsoil and the under-lying brown rock (i.e. weathered schist) will be stripped for the purposes of rehabilitation. It is not envisaged that additional footprint will be needed for temporary stockpiles as this material will be used directly on existing WRS final surfaces;
- The closure plan will continue to be comprised of progressive rehabilitation of Trimbells WRS, Coronation North WRS, Coronation WRS and the Pit Backfill. The open pit will form a pit lake within the remaining pit shell. All other rehabilitation programmes will remain as previously planned and consented;
- Access to Trimbells WRS will utilise existing consented alignments. The main access from the Coronation to the Coronation North Pits will be diverted approximately 300m to the mine's south east but will be contained within the proposed disturbance envelope;
- Temporary pedestrian access will largely remain unchanged from that established for the Coronation North Project. There will be a slight realignment in the mine west corner where the access will be pushed westward.
- The Coronation North Extension will be carried out, managed and monitored on substantially the same basis as the consented Coronation and Coronation North projects during operations in terms of mining methods, operating 24 hours a day seven days a week, drilling and blasting, use of the existing fleet of diesel powered mining equipment, transport movements, dust management, surface and groundwater management, sediment control, progressive rehabilitation of waste rock stacks;

¹ All volumes and weights in the table are expressed in millions.

- The existing haul road access to the Coronation North project area will largely remain unchanged. Mining access will continue to be from the haul road leading up from Horse Flat Road;
- Hauling of ore will be undertaken under a 'no night time hauling' policy until such time that agreement can be obtained with an affected party to alter that policy (see Section 6 for more information);
- Ore will continue to be processed at the existing processing plant and the existing processing rate at the plant of approximately 5-6MT per annum will also remain the same.

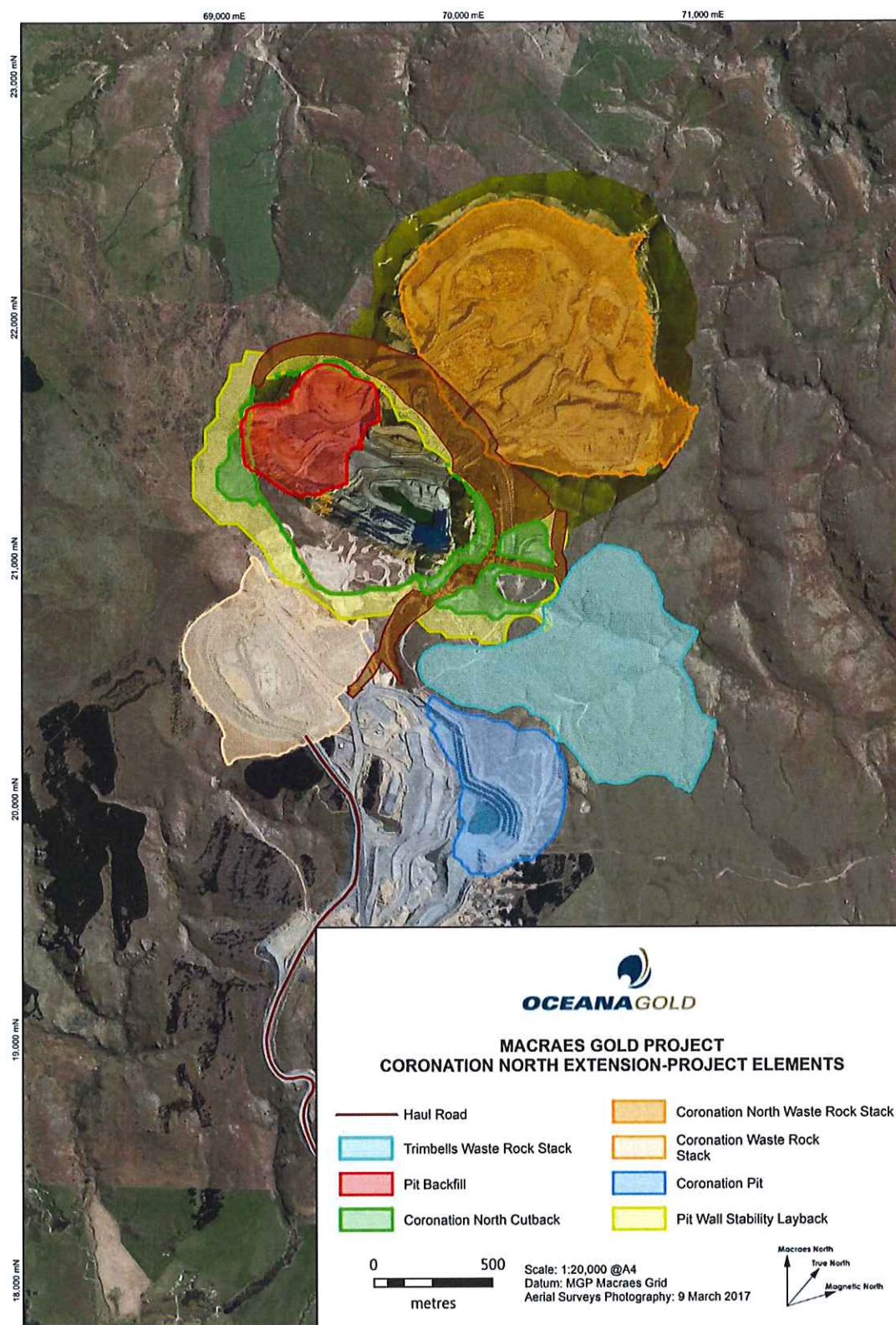


Figure 1-2 Coronation North Extension Project Elements

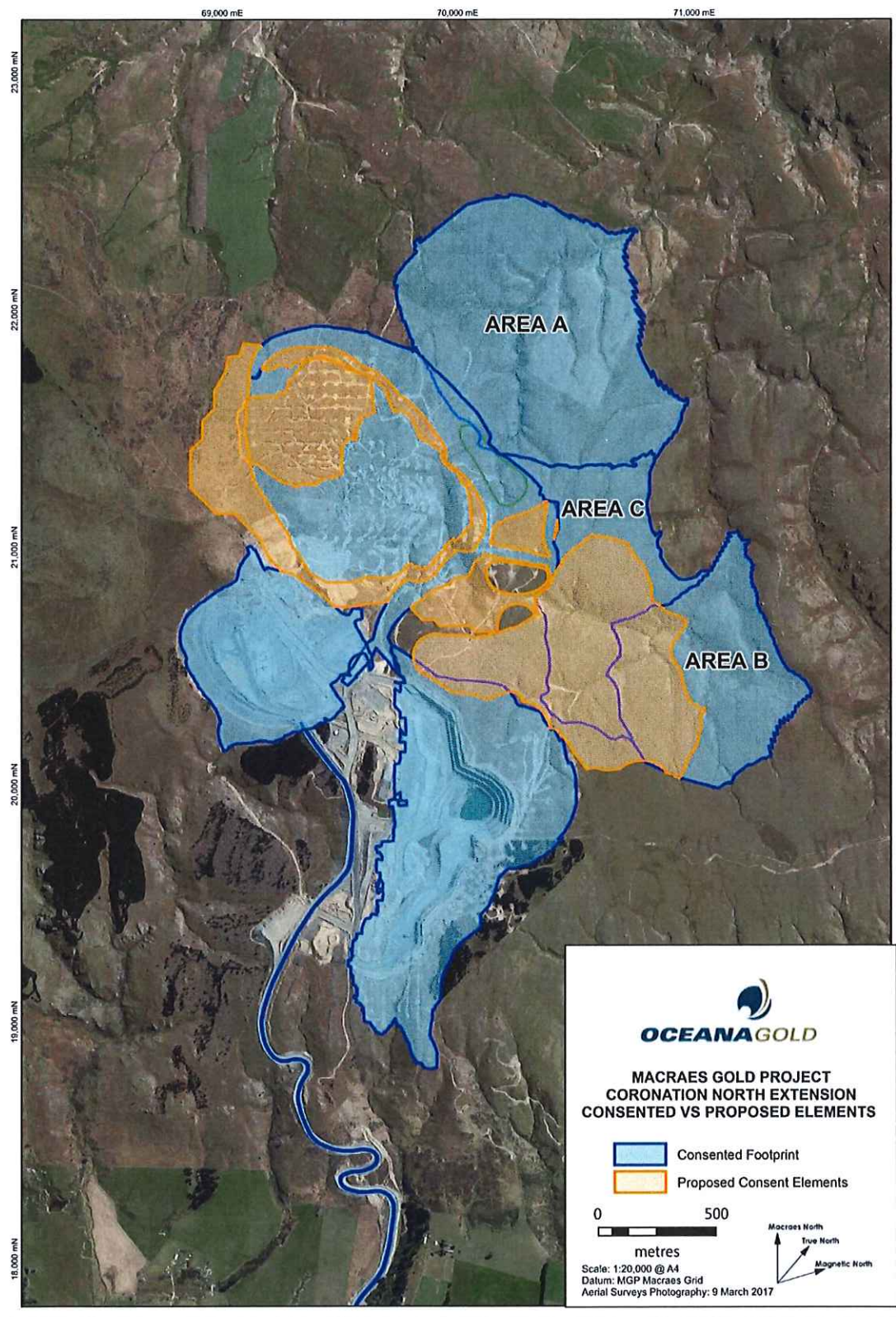


Figure 1-3 Consented and Proposed Consented Areas

2 LEGAL DESCRIPTION

The land upon which the Coronation North Extension Project falls is all under the one parcel, the legal description being: Part Section 2 Block V, Highlay Survey District with the CT number OT15A/514. The RAPID number is 560. This land is entirely owned and occupied by OceanaGold.

3 ACTIVITY STATUS AND CONSENTS REQUIRING VARIATION

Local and regional consents were issued for the Coronation Project (2012) and the Coronation North Project (2016) by the Otago Regional Council, Dunedin City Council, and the Waitaki District Council. The mining activity in the area was assessed as a discretionary activity and consents were issued to OceanaGold with a number of conditions attached.

As a result of discussions with DCC, new consents (as opposed to variations) are now being sought to undertake an extension to the currently consented Coronation North Pit. The new consents are not considered to cause any effects that are greater than minor as the impacts from the extension do not materially add to the impact attributed to the current consents. The various consents from each council are detailed below.

3.1 Otago Regional Council Consents

The Coronation North Project included permitting for; an extension to the Coronation Pit, the Coronation North Pit, Coronation North Waste Rock Stack, extending the roading infrastructure from the existing Coronation Project, and the creation of the Coal Creek Freshwater Dam. Variations are now being sought to the list of consents shown in Table 2 for the Coronation North Extension Project. There is no material change to the consent conditions being sought, but rather that maps annexed to the consent documents are updated. This is because the maps currently reference the Coronation North Project and changes are requested to reflect the modification of the Coronation North Pit boundary to provide for an extended pit footprint, and for relocation of the pit cut-off drain to a slightly more upstream point (but still within the area covered by the existing consent).

TABLE 2: OTAGO REGIONAL COUNCIL CONSENTS REQUIRING VARIATION

ORC Number	Consent	Description
RM16.138.01		To disturb, deposit and reclaim the bed of unnamed tributaries of Maori Hen Creek, Trimbells Gully, Mare Burn and Coal Creek for the purpose of constructing the Coronation North Waste Rock Stack
RM16.138.04		To discharge contaminants and water from silt ponds to unnamed tributaries of Maori hen Creek, Trimbells Gully, Mare Burn and Coal Creek for the purpose of operating silt ponds for Coronation North Pit and the Coronation North Waste Rock Stack.
RM16.138.06		To discharge water containing contaminants from Coronation North Pit Lake to unnamed tributaries of Maori Hen Creek, Trimbells Gully, Mare Burn and Coal Creek for the purpose of pit lake overflow
RM16.138.10		To discharge waste rock to land within the Coronation North Pit for the purpose of disposing of rock.
RM16.138.11		To take surface water for the purpose of dewatering Coronation North Pit and use for the purpose of dust suppression.
RM16.138.12		To take surface water for the purpose of creating the Coronation North Pit Lake.
RM16.138.13		To take groundwater for the purpose of dewatering Coronation North Pit and use for the purpose of dust suppression.
RM16.138.14		To take groundwater for the purpose of creating the Coronation North Pit Lake.
RM16.138.15		To divert water around the open pit known as Coronation North Pit and into unnamed tributaries of Maori Hen Creek, Trimbells Gully, Mare Burn and Coal Creek for the purpose of preventing surface water ingress and managing surface water runoff.
RM16.138.17		To dam water in the Coronation North Pit for the purpose of creating the Coronation North Pit Lake.
RM16.138.19		To discharge contaminants from mining operations and post mining rehabilitation

	to air for the purpose of undertaking mining operations.
RM16.138.20	To permanently divert water around the Coronation North Waste Rock Stack and into Maori Hen Creek, Trimbells Gully, Mare Burn and Coal Creek for the purpose of preventing surface water ingress and managing stormwater runoff.

3.2 Dunedin City Council

The Dunedin City Council issued Land Use Consents LUC-2016-234 for the Coronation North Project and amended LUC-2013-225A for the Coronation Project. This project introduces an extension to the footprint area of the Coronation North pit and amendment to the waste rock stack location. Variations are sought to the existing consents to change the naming conventions associated with the Coronation North Project and replace approved maps/plans with updated maps/plans that include reference to Coronation North Extension. A new land use consent is sought for the additional areas of land disturbance. Proposed conditions are discussed in Section 10 below.

TABLE 3: ACTIVITY STATUS AND CONSENTS REQUIRED – DUNEDIN CITY COUNCIL OPERATIVE PLAN

Type	Purpose	Plan Rule	Activity Status
Land Use	a) Extraction of minerals and overburden by mechanical means from Coronation North Pit (centred at grid reference NZTM 1394460E 4978050N);	6.5.6(v) 17.7.5	Discretionary Restricted Discretionary
	b) Deposition of waste rock produced by the operation to Coronation North Waste Rock Stack(centred at grid reference NZTM 1395310E 4978930N) and the deposit of waste rock as backfill into the Coronation North open pit;	6.5.6(v)	Discretionary
	c) Construction, operation and maintenance of various silt ponds and silt control facilities for controlling runoff from mining operations;	6.5.6(v) 17.7.5	Discretionary Restricted Discretionary
	d) Construction and use of haul roads;	6.5.6(v) 17.7.5	Discretionary Restricted Discretionary
	e) Construction and use of temporary buildings;	6.5.6(v)	Discretionary
	f) Earthworks in wetlands;	16.6.2(ii)	Discretionary
	g) Clearance or modification of indigenous vegetation;	16.6.2(i)	Discretionary
	h) Decommissioning and rehabilitation of the structures and works listed above;	6.5.6(v)	Discretionary
	i) The excavation, construction and operations of Coal Creek Dam and tracks associated with mining.	6.5.6(v)	Discretionary

TABLE 4: ACTIVITY STATUS AND CONSENTS REQUIRED – DUNEDIN CITY COUNCIL 2GP

Type	Purpose	Plan Rule	Activity Status
Land use	Mining (not in a General Residential 1 Transition Overlay Zone)	16.3.3 15	Discretionary
	Buildings and structure activities	16.3.4 3	Permitted
	Earthworks – large scale	8A.3.2.3	Restricted discretionary

3.3 Waitaki District Council

The Waitaki District Council issued Land Use Consents 201.2016.779 for the Coronation North Project and amended 201.2013.360.1 for the Coronation Project. As with the existing Otago Regional Council consents, other than recording an extension to the footprint area of the Coronation North pit and amendment to the waste rock stock location no material change is sought in the existing WDC consent conditions for the Coronation North Extension Project. The variation sought will change the naming conventions associated with the Coronation North Project and replace approved maps/plans with updated maps/plans that include reference to Coronation North Extension.

TABLE 5: ACTIVITY STATUS AND CONSENTS/CONSENT VARIATIONS REQUIRED – WAITAKI DISTRICT COUNCIL OPERATIVE PLAN

Type	Purpose	Plan Rule	Activity Status
Land Use	a) Deposition of waste rock (centred at grid reference NZTM 1395770E 4977492N) as backfill into the Coronation open pit;	6.3.2(1) (within MMP Mineral Zone)	Restricted Discretionary Discretionary
		4.3.3(4) (within Rural Scenic Zone)	
	b) Operation and maintenance of various silt ponds and silt control facilities for controlling runoff from mining operations;	6.3.2(1) within MMP Mineral Zone)	Restricted Discretionary
		4.3.3(4) (within Rural Scenic Zone)	Discretionary
	c) Use of haul road;	6.3.2(1) (within MMP Mineral Zone)	Restricted Discretionary
		4.3.3(4) (within Rural Scenic Zone)	Discretionary
	d) Use of 2 haul road crossings;	6.3.2(1) (within MMP Mineral Zone)	Restricted Discretionary
		4.3.3(4) (within Rural Scenic Zone)	Discretionary
		12.1.1	Discretionary
	e) Variation to timing of re-opening of Golden Point Road;	6.3.2 (within MMP Mineral Zone)	Discretionary
		4.3.3(4) or 4.4.3(14) (within Rural Scenic Zone)	Discretionary
	f) Use of temporary buildings;	10.1.1.2	Discretionary
	g) Use and storage of hazardous substances (explosives and diesel);	16.1.2(1)	Discretionary
	h) Decommissioning and rehabilitation of the structures and works listed above.	4.3.3(4)	Discretionary

4 STATUTORY CONSIDERATIONS

OceanaGold originally applied to vary its existing consents, however after discussions with the DCC OceanaGold is now applying for new consents to authorise the Coronation North Extension.

The DCC land use consent being sought represents a small increase in the size of the pit footprint to allow additional ore to be accessed and to lay back the pit wall to improve stability. No changes to the transportation and processing of ore are contemplated. No increase to the footprint and volume of waste rock storage is proposed, rather the design of the waste rock stack has been optimised resulting in modification of the location and a reduced footprint area. This is because the pit extension allows OceanaGold to backfill into the enlarged pit, and therefore reduces the amount of material to be deposited in the waste rock stack. The Coronation North Extension will Result in an extension of four months beyond the three mining period however no new adverse effects that are more than minor are to occur

No new activities requiring new regional council consents are being undertaken. The existing regional consents relevant to the Coronation North pit will continue to apply to the varied mining activity and the only changes contemplated are a relocation of the pit cut-off drain to a slightly more upstream point (but still within the area covered by the existing consent) and an increase in the area of the pit that is expected to fill as a lake over time, once mining has ceased. No substantive changes to any regional council consent conditions are proposed, only replacement of approved plans.

4.1 Part II of the RMA

In August 2018 the Court of Appeal released its decision on *RJ Davidson Family Trust v Marlborough District Council* [2018] NZCA 316. The Court held that in the context of resource consent applications, a consent authority is not prohibited from considering Part 2 of the Resource Management Act 1991 (RMA). Instead Part 2 provides "strong directions, to be borne in mind at every stage of the planning process", however this should not be to the extent that Part 2 is used to subvert an otherwise clear direction in a planning instrument. It is therefore seen as relevant and appropriate to consider Part 2 of the RMA.

The purpose of the RMA through section 5 is to promote the sustainable management of natural and physical resources. Section 5 defines "sustainable management" as:

"Managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while –

- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment."

The Coronation North Extension Project achieves the purpose of the RMA. It will allow additional ore to be accessed and processed utilising the existing infrastructure and mining methods. The ability to structure operations so that waste can be progressively backfilled into the pit without generating additional truck movements or needing a larger waste rock stack is also economical. It is therefore an efficient use of resources and will contribute to the ongoing social and economic needs of the community by further enhancing the ongoing sustainability of the operation.

The sustainable nature of mining activities undertaken by OceanaGold for 28 years has been recognised through the numerous resource consents issued for mining at Macraes. Of particular relevance, the consent authorities recognised through the granting of consents for the Coronation North Project that the mining of the Coronation North resource in the manner proposed promotes sustainable management. The Coronation North Extension Project proposes these same methods being extended to a slightly enlarged pit area, and OceanaGold's view is that the same analysis as to the appropriateness of mining at Coronation North that was applied by the consent authorities when consents were granted applies to the extension.

Section 6 of the RMA states that in achieving the purpose of the RMA all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the various matters of national importance. None of the listed matters of national importance are invoked by the Coronation North Extension Project. In particular, in relation to the protection of areas of significant indigenous vegetation and significant habitats of indigenous

fauna as required by section 6(c) it is noted that the ecological assessment states that no new significant areas or species have been encountered in the area of the proposed pit extension and therefore the existing conditions regarding ecological mitigation and compensation remain appropriate.

Section 6(a) provides for the preservation of wetlands and the protection of them from inappropriate use and development. The ecological assessment concludes that the avoidance of already consented area provides for net gain in biodiversity as a result of the Coronation North Extension Project, but also suggests restoration of wetlands currently contained within an existing protected area

Section 6(b) provides for the protection of outstanding natural features and landscapes from inappropriate use and development. The operative DCC Plan lists part of the project area as an outstanding landscape. However, the DCC's second generation district plan ("2GP") was notified in 2015 and it no longer classified the area as outstanding landscape. There were no public submissions that requested the area be re-classified as outstanding landscape. Decisions on the 2GP were notified on 7 November 2018. 83 appeals on the 2GP have been lodged in the Environment Court and there are no appeals relating to the landscape classification in the project area. Now that decisions have been released the provisions of the 2GP that are not under appeal replace the provisions in the operative Plan. Therefore, although the operative plan identifies part of the project area as an outstanding landscape this is no longer relevant. . Regardless, the visual impacts of the proposed pit extension and re-designed waste rock stack have been assessed as no more than minor.

In relation to the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna as required by section 6(c) it is noted that the ecological assessment concludes that no new significant areas or species have been encountered within the Project's footprint and the avoidance of already consented land will result in a net gain in biodiversity. Therefore the existing conditions regarding ecological mitigation and compensation remain appropriate.

The matters of national importance in 6(d) and (f) are not considered relevant here – this is private land and there is no public access, and there is no historic heritage identified within the project area. In any event OceanaGold operates an accidental discovery protocol that would apply should any heritage items be discovered during development.

Matters 6(e) and 6(g) - the relationship of Maori to the site and protection of customary rights – have to the best of OceanaGold's knowledge already been addressed by the cultural impact assessments (CIA) that were completed for the Coronation and Coronation North projects. However, OceanaGold is consulting Nga Runanga on this application and should any new, previously unidentified, matters arise is open to considering and appropriately responding to them.

In respect of management of significant risks from natural hazards under 6(h) OceanaGold considers the mine development will continue to be designed and constructed utilising expert advice that will ensure that hazards are appropriately assessed and managed.

Section 7 of the RMA states that in achieving the purpose of the RMA, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to a range of matters, namely:

- "(a) Kaitiakitanga;*
- (aa) The ethic of stewardship;*
- (b) The efficient use and development of natural and physical resources;*
- (ba) The efficiency of the end use of energy;*
- (c) The maintenance and enhancement of amenity values;*
- (d) Intrinsic values of ecosystems;*
- (e) Repealed;*
- (f) Maintenance and enhancement of the quality of the environment;*
- (g) Any finite characteristics of natural and physical resources;*
- (h) The protection of that habitat of trout and salmon;*
- (i) The effects of climate change;*
- (j) The benefits to be derived from the use and development of renewable energy."*

Section 7 (ba), (h), (i) and (j) are not relevant to this application.

In respect of section 7(a) and (aa), as mentioned above a CIA that was completed for the Coronation Project was updated for Coronation North and raised no matters of particular cultural concern. Given the

minor changes proposed as part of the Coronation North Extension Project OceanaGold does not consider that section 7(a) and (aa) require particular regard. Nevertheless, further consultation with iwi will be undertaken as a means to address their concerns (if any).

The Coronation North Extension Project represents an efficient use of resources under section 7(b) because it utilises existing physical resources from the operation and further develops a natural resource that is recognised as being of value to the district and regional community.

In terms of section 7(c) the definition of amenity values means "*those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes*". The amenity values of the area include most notably the modified landscape and associated industrial scale activities associated with mining at Coronation North and Coronation. The changes in amenity value of the area as a consequence of the Coronation North Extension Project are less than minor. In this connection it is important to note that the pit and waste rock stack areas are on private land and are not accessible to the public.

In respect of section 7(d), (f) and (g) the intrinsic values of the ecosystems, including the flora and fauna that form part of them, at the Coronation North Project Area and downstream will continue to be appropriately protected, remedied or mitigated in accordance with the existing conditions of consent. In particular, the consented rehabilitation approach will ensure the longer term quality of the natural and physical resources within the area.

It is considered that the application is consistent with the requirements of Sections 6 and 7 of the RMA.

Section 8 of the RMA requires all persons acting under the RMA to take into account the principles of the Treaty of Waitangi. This will be addressed by having ongoing regard to the existing CIA, and through ongoing consultation with iwi.

4.1.1 Section 105 of the RMA

When considering an application for a discharge permit, section 105(1) of the RMA requires regard to be had to:

- "(a) The nature of the discharge, the sensitivity of the receiving environment, and the applicant's reasons for the proposed choice;*
- (b) Any possible alternative methods of discharge including discharge into any other receiving environment."*

OceanaGold has chosen to locate the Coronation North Extension Project as proposed because that is where additional gold resources have been discovered and it is economically sensible to extend the existing pit to access this material. As with the existing consented discharges from Coronation North pit the discharges from the Extended Coronation North Pit are unavoidable and OceanaGold will manage them into the ultimate receiving environments in the same manner as the existing discharges so that they will not give rise to anything other than minor effects.

The discharge of waste rock to land is located largely within the existing consented footprint of the Coronation North WRS and more efficiently manages waste rock disposal, thus reducing the footprint area of the WRS and having overall lesser effects on the receiving environment.

4.1.2 Section 107 of the RMA

Section 107(1) of the RMA states that a discharge permit shall not be granted if, after reasonable mixing, the contaminant or water discharged is likely to give rise to all or any of the following effects in receiving waters:

- (c) The production of any conspicuous oil or grease films, scums or foams, or floatable or suspended material; or
- (d) Any conspicuous change in the colour or visual clarity; or
- (e) Any emission of objectionable odour; or
- (f) The rendering of freshwater unsuitable for consumption by farm animals; or
- (g) Any significant adverse effects on aquatic life.

The changes contemplated as part of the Coronation North Extension Project do not alter the conclusion of the Coronation North assessments which indicated that provided proposed mitigation measures are implemented, the discharges should not give rise to any of the effects listed above.

4.2 National Environmental Standards (NES)

The following current NES were relevant to the Coronation North Project and continue to be relevant to the Extension project:

- Air Quality Standards;
- Assessing and managing contaminants in soil to protect human health.

Air Quality Standards

As the Beca *'Assessment of Environmental Effects of Discharges to Air'* report states (refer Appendix 3 of the Coronation North application) there were no restrictions under the National Environmental Standards for Ambient Air Quality (NESAQ) to the granting of consent for the Coronation North Project, and that continues to be the case for the Extension Project.

In October 2004, the Government introduced five National Environmental Standards for Ambient Air Quality (NESAQ) with three subsequent amendments. The NESAQ regulations are designed to address the health effects caused by poor air quality. Ambient air quality standards for fine particles (PM₁₀), sulphur dioxide (SO₂), nitrogen oxides (NO₂), carbon monoxide (CO) and ozone (O₃) came into force on 1 September 2005. The standard of relevance to this application is the NES for PM₁₀. The PM₁₀ standard allows a maximum of one exceedance per year of a PM₁₀ concentration of 50 µg/m³ (24 hour average).

Regulation 17 restricts the granting of resource consents for discharges of PM₁₀ where that discharge would be likely to increase off-site 24 hour average PM₁₀ concentrations in "polluted" airsheds, by more than 2.5 µg/m³ at any time.

The proposed Coronation North Extension Project area is located within the airshed comprised of all areas within the Otago region that do not fall within the four gazetted airsheds. There is no meaningful PM₁₀ concentration data available for this airshed and it therefore does not meet the NESAQ definition of "polluted". As such there are no restrictions under Regulation 17 to the continuation of the air discharge consent for the Extension Project.

Contaminated Land

Under the regulations that govern assessing and managing contaminants in soil to protect human health, land is considered to be actually or potentially contaminated if an activity or industry on the Hazardous Activities or Industries List (HAIL) has been, is, or is more likely than not to have been, undertaken on that land. The additional land upon which the Coronation North Extension Project is to be located has not been used for any of the activities listed on the HAIL because it has been used for farming, predominantly grazing. There are therefore no restrictions to the granting of consent for the Coronation North Extension Project with regard to managing contaminants in soil to protect human health.

4.3 National Policy Statement for Freshwater Management

The NPS for freshwater management took effect on 1 July 2011 and was updated in 2014 to provide greater direction for Councils in setting freshwater objectives and limits in their regional plans by prescribing a National Objectives Framework (NOF) and the NPS was further amended in 2017. It provides overarching objectives and policies for managing the quality and quantity of freshwater resources within the country. The NPS was considered prior to the granting of consents for Coronation North. As the Extension Project has less than minor changes to freshwater resources from the consented effects of Coronation North it is considered that the proposal is not in conflict with the NPS.

4.4 Regional Policy Statement for Otago (RPS)

The Otago Regional Policy Statement (RPS) was made operative on 1 October 1998. The RPS gives an overview of the resource management issues facing Otago and establishes policies and methods to manage Otago's natural and physical resources.

The Proposed RPS was publicly notified on 23 May 2015. OceanaGold made extensive submissions on the Proposed RPS and opposed the Proposed RPS's failure to adequately acknowledge that mining is

location specific and the mining resources may be situated where other values (for example ecological values or heritage values) are present. The decision on the Proposed RPS released by the Otago Regional Council failed to address these matters in OceanaGold's view. There were numerous appeals filed in the Environment Court including an appeal by OceanaGold which sought to better reflect the regional importance of providing for mining in Otago, and the need to manage mining activities with care where they intersect with other important values such as significant landscape and biodiversity values. Court assisted mediation resulted in significant negotiated changes to the provisions of the Proposed RPS. However, two appeals, one being OceanaGold's appeal, were not resolved through negotiations and became the subject of Environment Court hearings. The issues from OceanaGold's appeal that were heard in court related to mining and indigenous biodiversity offsetting. The decision on OceanaGold's appeal has not yet been released. The Environment Court released a decision on the other appeal on 28 September 2018 and it has been appealed to the High Court, with a hearing set down in June 2019. The other appeals with resolved matters were placed before the Environment Court for consent orders to be made and consent orders have been granted.

The proposed RPS has been made partially operative from 14 January 2019. The Partially Operative Otago Regional Policy Statement 2019 (changes as a result of appeals) ("POORPS") brings into force the provisions of the proposed RPS that are no longer subject to appeal. The POORPS aims to ensure Otago's natural and built resources are managed well – now and for the future.

District and regional councils need to give effect to the RPS when making decisions about resource consents. Where there is an operative RPS and a proposed RPS both documents must be considered and the Proposed RPS is given weight depending on how far through the planning process it has progressed. It is considered that the majority of the POORPS can be given full weight. However, the mining and biodiversity offsetting provisions in the RPS remain operative and provisions in the POORPS on those issues can be given little weight as they remain under appeal and do not have full legal force.

The assessment of environmental effects that accompanied the application for consents for Coronation North included an analysis of the relevant provisions of the Operative and Proposed RPSs. The analysis concluded that the Coronation North proposal was consistent with the purpose and principles of the relevant provisions of the Operative RPS and generally consistent with the Proposed RPS.

An assessment of relevant Operative RPS provisions that remain in force and the POORPS follows.

Operative RPS

Under Issue 5.3.2 it is identified that the primary productive capacity of Otago's land resource may be compromised by activities which result in loss of vegetation cover, or the spread of plant and animal pests or degradation of the soil resource, or flooding or inadequate drainage. And Issue 5.3.5 identifies that land use activities can adversely affect ecological, amenity and intrinsic values associated with Otago's significant indigenous vegetation and significant habitats of indigenous fauna.

Objective 5.4.1 seeks:

To promote the sustainable management of Otago's land resources in order:

- (a) To maintain and enhance the primary productive capacity and life-supporting capacity of land resources; and*
- (b) To meet the present and reasonably foreseeable needs of Otago's people and communities.*

And Objective 5.4.2 seeks to "avoid remedy or mitigate degradation of Otago's natural resources resulting from activities utilising the land resource."

Associated policies are: 5.5.3 – maintain and enhance land resource through avoiding, remedying or mitigating adverse effects of activities; 5.5.4 – promote diversification and use of land resource to achieve sustainable landuse and management systems for future generations; and 5.5.5 – minimise adverse effects of landuse activities on the quality and quantity of water resource through promoting and encouraging the...(b) maintaining and where practicable enhancing, vegetation cover, upland bogs and wetlands to safeguard land and water values.

This project is consistent with the purpose of sustainable management. Ongoing mining helps support the economic and social wellbeing of the Macraes community and wider region by the provision of jobs, expenditure in the region and involvement of the workforce in community groups and clubs. During the extension project OceanaGold will continue to operate in a manner that adequately manages pest and weed control and drainage. As previously stated, there have been no significant terrestrial ecology values identified in the extended pit project area and the values that exist in the amended WRS footprint are overall of lesser significance than the values that will be avoided in the currently consented WRS footprint

Additional mitigation is also proposed to account for loss specific habitat loss. Rehabilitation that will return the land to its primary production use following completion of mining and the productive capacity of the land will be maintained.

Issue 5.3.4 identifies that Otago's outstanding natural features and landscapes are threatened by inappropriate subdivision, use and development. Objective 5.4.3 is *"to protect Otago's outstanding natural features and landscapes from inappropriate subdivision, use and development."* And Policy 5.5.6 seeks *"to recognise and provide for the protection of Otago's outstanding natural features and landscapes"*. The project is not located in an area of ONF or ONL and has previously been granted consent which demonstrates that it is not considered to be inappropriate use or development in this location.

Issue 5.3.7 identifies that access to mineral resources may be compromised through the inappropriate location of other development activities above or in close proximity to the mineral resource. Policy 5.5.8 is *"To recognise known mineral deposits and to consider the potential for access to those mineral resources to be compromised or removed by other alternative land development."* Although this issue is not relevant to this project it demonstrates that the Operative RPS recognises that minerals are an important resource for the people and communities of Otago in providing for their present and future wellbeing and acknowledges that mineral resources are fixed and can only be utilised in the location where they are found.

Objective 5.4.5 is *"To promote the sustainable management of Otago's mineral resources in order to meet the present and reasonably foreseeable needs of Otago's communities"*. Since the location of minerals is fixed there is no alternative location for the Coronation North Extension Project. The project proposal supports the continuation of mining under new or varied consents in a manner that provides for sustainable management of the resource. The project will support ongoing social and economic benefits to the community.

Chapter 6 relates to Water and identifies as an Issue that *"Ecological, amenity and intrinsic values associated with Otago's wetlands are compromised by ...(c) adverse effects of activities in and round wetlands"* (Issue 6.3.7).

Objective 6.4.3 seeks to safeguard the life-supporting capacity of water resources through protecting their quantity and quality. Objective 6.4.4 seeks to maintain and enhance the ecological, intrinsic, amenity and cultural values of water resources. Objective 6.4.5 is to avoid, remedy or mitigate degradation of water resources resulting from the use or development of the beds of water bodies and of adjacent land areas.

Policy 6.5.6 aims to protect Otago's significant wetlands from the effects of activities **except where** the activity can be shown to have no significant adverse effects on factors including *"(a)(iii) the natural hydrological characteristics of the wetland", "(a)(v) habitats of indigenous fauna", "(a)(vi) amenity values", "(a)(vii) intrinsic values of ecosystems" or except where "(b) alternative habitats of a similar or improved nature are provided in compensation for any loss of habitat."* Policy 6.5.9 is *"to allow for the community's use, development...of the beds...of Otago's water bodies provided (a) Any adverse effects on (ii) the natural character of the water body; or (iii) habitats of indigenous fauna; or (iv) amenity values; or (v) intrinsic values of ecosystems are avoided, remedied or mitigated, and that the life supporting capacity of the water body is maintained and, where practicable, enhanced..."*. Mitigation measures outlined in section 6.1.4 are believed to fulfil the aims of Policy 6.5.6.

POORPS (Changes as a result of appeals)

Objective 1.1 is that *'Otago's resources are used sustainably to promote economic, social and cultural wellbeing for its people and communities'*. Policy 1.1.1 seeks to *"provide for the economic wellbeing of Otago's people and communities by enabling the resilient and sustainable use and development of natural and physical resources"*. The project will enable continued operation at Coronation North which promotes local and regional economic and social benefits.

Chapter 2 of the POORPS relates to recognition of Kai Tahu values and interests. As discussed, there are no known wahi tapuna sites affected by the project and the previous Cultural Impact Assessments and OceanaGold's accidental discovery protocols ensure there are appropriate procedures in place in the event any important sites are discovered. Policy 2.2.1 seeks to support Kai Tahu wellbeing by safeguarding the life-supporting capacity of natural resources. It is considered that this project is not incompatible with that intent.

Chapter 3 of the POORPS – Otago has high quality natural resources and ecosystems – contains objectives and policies regarding biodiversity. They remain under appeal therefore they are not discussed further in this assessment.

Chapter 4 of the POORPS – Communities in Otago are resilient, safe and healthy – contains objectives and policies regarding natural hazards, climate change, energy resources, nationally and regionally significant infrastructure, urban growth and hazardous substances which are not considered directly relevant to this project. Policies of relevance include:

Policies 4.1.4 and 4.1.5 – assess and manage activities for natural hazard risk to people, property and communities, It is considered that improving the stability of Coronation North pit to enhance its performance in a natural hazard seismic event is consistent with this policy approach. The WRS will continue to be designed and constructed in accordance with best industry practice regarding long-term stability and safety.

Policy 4.6.2 managing the use, storage and disposal of hazardous substances; and Policy 4.6.8 managing waste storage and disposal. All of OceanaGold's operations at the MGP, including this extension project, meet the requirements set out in these policies.

Policy 4.6.9 seeks to avoid the creation of new contaminated land, and where this is not practicable, to minimise adverse effects on the environment. There are additional areas of land required for the extension project including a small area of farmland that will become waste rock stack. OceanaGold will take appropriate measures to minimise any adverse environmental impacts.

Chapter 5 of the POORPS – 'People are able to use and enjoy Otago's natural and built environment' – contains objectives and policies which this project is consistent with. Relevantly:

Objective 5.2 and policies 5.2.1, 5.2.2, and 5.2.3 seek to recognise and identify historic heritage and manage adverse effects upon it. There are no known heritage sites impacted by this project and the area is previously modified land so it is not anticipated that any will be found, however OceanaGold operates an accidental discovery protocol and if any heritage features are discovered appropriate steps will be followed to investigate and record them.

Objective 5.3 – 'Sufficient land is managed and protected for economic production' – is supported by Policy 5.3.1(b) which aims to manage activities in rural areas to support the region's economy and communities, by providing for mineral exploration, extraction and processing. The extension project will assist to provide for the MGP to continue operating and supporting the economy and local communities.

Chapter 5 also contains the mining and biodiversity offsetting provisions that remain under appeal, and which are not considered here.

Overall OceanaGold considers that the Coronation North Extension Project will be consistent with both the Operative RPS and the POORPS.

4.5 Regional Plan: Water for Otago (RPW)

The following policies from Chapter 5 (Natural and Human Use Values), Chapter 6 (Water Quantity), Chapter 7 (Water Quality), Chapter 8 (The Beds and Margins of Lakes and Rivers) and Chapter 9 (Ground Water) of the RPW were assessed as relevant to the Coronation North Project applications, and are therefore relevant to the Extension project to the extent that it concerns the same water bodies in and around the Coronation North pit.

In terms of Chapter 5:

Policy 5.4.3
Policy 5.4.8
Policy 5.4.9
Policy 5.4.10

Overall the Coronation North Extension Project applications are considered to be consistent with Chapter 5 of the RPW. The existing activities will have an effect on surface and ground water values but proposed conditions of consent will ensure that these effects are avoided and mitigated as far as practically possible. That will continue to be the case with the Extension Project. Existing lawful uses or priorities for the use of water will still be avoided (Policy 5.4.3). Because the takes are from the open pit area, as opposed to

directly from a watercourse, there are no features or values of watercourses that need to be had regard to (Policies 5.4.8, 5.4.9 and 5.4.10).

The following policies in Chapter 6 were assessed as relevant to the Coronation North Project and are therefore relevant to the Extension Project to the extent that it involves ongoing impacts in the area of the Coronation North pit:

- Policy 6.4.0
- Policy 6.4.0A
- Policy 6.4.0C
- Policy 6.4.1A
- Policy 6.4.10A3(d)
- Policy 6.4.16
- Policy 6.4.19
- Policy 6.5.6

Water takes are necessary to manage groundwater that collects in the open pit as opposed to being a water take that is directly from a water course. Accordingly there are no instream values that will be affected by the taking of groundwater. Pit dewatering for hard rock mining activities is provided for in Policy 6.4.10A3(d) when the aquifer is not mapped in the C-series of the RPW, and this aquifer is not mapped. It is considered that the Coronation North Extension Project application is consistent with the purpose and principles of Chapter 6.

The following policies from Chapter 7 of the RPW concern discharges:

- Policy 7.B.2
- Policy 7.B.6
- Policy 7.B.8
- Policy 7.C.2
- Policy 7.C.3

These policies were considered as part of the Coronation North Project and overall the application was considered to be consistent with the purpose and principles in Chapter 7 of the RPW. No changes to volumes and types of discharges are proposed as part of the Coronation North Extension Project, and OceanaGold considers this conclusion remains valid.

The following policies from Chapter 8 of the RPW were considered relevant to the Coronation North Project:

- Policy 8.4.2
- Policy 8.5.3
- Policy 8.6.1
- Policy 8.6.2
- Policy 8.8.1
- Policy 8.8.2

OceanaGold will continue to operate erosion and sediment control plans as part of the Coronation North Extension Project to ensure the effects of activities adjacent to water courses continue to be controlled and to minimise any reduction in water clarity caused by bed disturbance. There are no practical alternatives to the proposed reclamation of water courses if the Coronation North Extended Pit is to be constructed. Waste rock, rather than clean fill, will be used in the reclamation of water courses but, other than in that respect, the applications are considered overall to be consistent with Chapter 8 of the RPW.

4.6 Regional Plan: Air for Otago (RPA)y

The RPA became operative in 2003 and was amended in 2006 and 2009.

Objectives 6.1.1, 6.1.2 and 6.1.3 provide:

Objective 6.1.1 – To maintain ambient air quality in parts of Otago that have high air quality and enhance ambient air quality in places where it has been degraded

Objective 6.1.2 – To avoid adverse localised effects of contaminant discharges into air on:

- Human health;
- Cultural, heritage and amenity values;
- Ecosystems and the plants and animals within them; and
- The life-supporting capacity of air.

Objective 6.1.3 – To allow for sustainable use of Otago's air resource.

The proposal is considered consistent with these objectives.

Policy 7.1.1 – To recognise and provide for the relationship Kai Tahu have with the air resource through procedures that enable Kai Tahu to participate in management of the air resources.

The extension proposal should not result in adverse effects on the relationship that Kai Tahu, as Kaitiaki, have with the air resource or affect the ability of Kai Tahu to participate in the management of the air resource.

Policy 8.1.1 – To have regard to the Otago Goal Levels identified in Schedule 1 and comply with the Resource Management (National Environmental Standard Relating to Certain Air Pollutants, Dioxins and Other Toxics) regulations (2004) in managing the regions ambient air resource.

Monitoring of PM₁₀ in the vicinity of the current Macraes Gold Project mining activity has found that concentrations are well below the NES and Otago Goal Levels.

Policy 8.2.3 – In the consideration of any application to discharge contaminants into air, Council will have;

- a) *Particular regard to avoiding adverse effects including cumulative effects on:*
 - i. *Values of significance to Kai Tahu*
 - ii. *The health and functioning of ecosystems, plants and animals*
 - iii. *Cultural, heritage and amenity values*
 - iv. *Human health*
 - v. *Ambient air quality of any airshed; and*
- b) *Regard to any existing discharge from the site, into air, and its effects*

The actual, potential and cumulative effects of the proposal on human health, ecosystems, amenity values and cultural and heritage values are considered to be less than minor.

Policy 8.2.8 – To avoid discharges to air being noxious, dangerous, offensive or objectionable on the surrounding local environment.

The effects of the proposed Coronation North Extension Project will be the same as those assessed for the Coronation North Project. The current operation has not caused any effects to date that have been considered to be noxious, dangerous, offensive or objectionable and similarly it is expected that the discharges from the extended pit area will not be noxious, dangerous, offensive or objectionable.

Policy 10.1.1 – The Otago Regional Council will encourage:

- a) *People undertaking land use activities to adopt management practices to avoid, remedy or mitigate any adverse effects of dust beyond the boundary of the property; and*
- b) *City and District councils to use land use planning mechanisms and other land management techniques to manage land use activities which have the potential to result in dust beyond the boundary of the property.*

OceanaGold currently employs dust mitigation methods which have been demonstrated to be effective, and these will continue to be used.

Overall, the discharges to air from the proposed expansion of mining activities are considered to be consistent with the policies and objectives of the RPA.

4.7 Dunedin District Plan

4.7.1 Landscape

Chapter 14 of the Dunedin City District Plan ("DDP") records objectives and policies to identify and protect the important characteristics of Dunedin's outstanding landscapes. This includes the High Country Outstanding Landscape Area ("HCOLA") outlined in 14.5.1(b) (page 14:13), where the Coronation North Pit is located. The features to be protected in the HCOLA include: "the highly coherent natural landform under an apparently largely unmodified grassland vegetative cover; the very limited visual impact of any human imposed element; the rock outcrops which give rise to a dramatic skyline and create particular visual interest generally; the large scale, open, expansive, remote wilderness character; the vegetation patterns which reinforce and reflect landform character; the fragile ecosystems." The principal threats to visual quality, which are controlled by rules in the DDP, are considered to be: "roads and tracks; and excavations – inappropriate siting and scale of ... excavations such that they become visually dominant focal points." Other threats to visual quality, which are covered by design guidelines that operate in conjunction with the DDP, include: "structures - inappropriate siting, design, scale and finish of structures such that they become visually dominant from public viewpoints; areas of indigenous vegetation – removal or diminution of significant natural features such as areas of indigenous vegetation."

Assessment matters in section 6.7 of the DDP include: sustainability; manawhenua; amenity values; cumulative effect; intensity of activities; noise; glare and lighting; visual impact; clearance of vegetation; archaeological sites; indigenous vegetation and habitats; hazards; landscape; conflict and reverse sensitivity.

As previously mentioned, it is considered that the HCOLA is no longer relevant to the extension project as the 2GP is now in force.

4.7.2 Hazards

Chapter 17 of the DDP addresses the issue of seismic risk. Seismic risk is addressed through existing conditions of consent, and no changes to the consent conditions are necessary or sought for this topic, therefore it is considered that the Coronation North Extension Project is consistent with the objectives and policies in this part of the DDP.

Hazardous substances are also covered in Chapter 17. As with existing operations, OceanaGold considers that activities within the extended Coronation North Pit will be consistent with the objectives and policies of this part of the DDP.

Earthworks are controlled in Dunedin according to their location and scale: policy 17.3.9. This means resource consent is only required where the scale and/or location of earthworks are such that adverse effects are likely. If resource consent is required the range of effects assessed is tailored to the scale and location of the earthworks.

4.7.3 Indigenous Vegetation and Fauna

Chapter 16 of the DDP contains objectives and policies to promote retention of remaining areas of indigenous vegetation and habitats of indigenous fauna. The Coronation North Extension Project is not located in an area of 'significant conservation value listed in Schedule 25.4'. Vegetation clearance and earthworks (including deposit of fill in wetlands) requires discretionary activity consent under rule 16.6.2.

4.7.4 Manawhenua

The objectives and policies contained in Chapter 5 have been observed by OceanaGold's consultation with manawhenua and commissioning of a CIA in connection with the Coronation and Coronation North projects. The company will continue to consult with iwi in relation to all aspects of the Macraes operation, including the proposed extension to Coronation North pit and waste rock stack reconfiguration.

4.7.5 Sustainability

Objectives and policies in Chapter 4 of the DDP seek to achieve the sustainable management of the city's resources, in accordance with the purpose of the RMA. Overall, taking into account that it is proposed that the same or very similar conditions of consent continue to apply, it is considered that the Coronation North Extension Project satisfies this purpose.

4.7.6 Farming Activity

Relevant to the permitted baseline, it is noteworthy that stock grazing is a permitted activity in the Rural Zone. Vegetation clearance associated with farming activity is also permitted, although clearance of a wetland where the vegetation is not totally separated from other indigenous vegetation, is more than 5 hectares in area and includes a threatened species listed in Appendix 16A of the Plan (for instance *Olearia bullata* or *Chionochloa rubra subsp. Cuprea*) would be a discretionary activity that required resource consent.

4.8 DCC Proposed 2GP

The Dunedin City Council's proposed 2GP was notified on 26 September 2015. Hearings on the 2GP have concluded and the decisions were released on 7 November 2018. This means that the rules in the 2GP that are not under appeal now have "legal effect". The objectives and policies of the proposed 2GP need to be considered alongside the objectives and policies of the operative DCC Plan and given appropriate weight depending on how far through the Schedule 1 RMA process the 2GP has progressed.

The introduction to the rural zone section recognises that "The rural environment contributes significantly to Dunedin's economy through rural primary production activities such as farming, and forestry, **and mining...**" (emphasis added).

The Coronation North Pit (including the proposed extension) sits within the DCC High Country Rural Zone, and as a result of the decisions the site is also within the Taieri Ridge and Mare Burn mapped area (this is discussed further below). Potential adverse effects of mining on the amenity of residential activities on surrounding properties are to be avoided or, if avoidance is not practicable, adequately mitigated (Policy 16.2.2.5). Adverse effects on residential amenity will be avoided. The nearest non-OceanaGold owned residences to the Coronation North Pit are 2.0 km (Howards), 4.8 km (Vanderley) and 2.4 km (O'Neil). The Assessment of Effects of Discharges to Air that accompanied the Coronation North applications concluded that with appropriate mitigation any adverse effects downwind of the site are expected to be less than minor. Experience with operating Coronation North has confirmed that this assessment was accurate. No change is expected with the pit extension because the extension allows for backfilling of the pit and therefore there are no additional haul road movements. Similarly, the separation distance and topography between the pit area and the nearest potentially sensitive receptors is such that other amenity effects (such as visual impact, lighting, noise, vibration and fly rock) from activities in the area of the extended pit will be less than minor.

Under Policy 16.2.3.4 mining is only to be allowed where there is reasonable certainty that land will be restored or rehabilitated to an acceptable standard in terms of landform and productive, recreational or conservation use as soon as possible. The extension area of the pit site will be progressively rehabilitated as appropriate and incorporated into the consented Coronation North pit lake which will be formed on closure.

Mining is only to be allowed where adverse effects from large scale development on rural character and visual amenity will be avoided or minimised as far as practicable (Policy 16.2.3.5).

Policy 16.2.3.9 requires activities to be designed and operated to ensure that adverse effects from light spill on rural character and amenity, and the ability of people to view the night sky, will be no more than minor.

Objective 8A.2.1 aims for permitted or approved earthworks to avoid or adequately mitigate any adverse effects on visual amenity and character; the stability of land, buildings, and structures; and surrounding properties.

Section 10 of the 2GP deals with the natural environment and as one of its objectives seeks to maintain and enhance areas of indigenous vegetation and the habitats of indigenous fauna. Specific policies concern mining activity and require restoration of indigenous vegetation where it was cleared for mining, and if this is not practicable to otherwise ensure that biodiversity values are maintained or enhanced (Policy 10.2.1.7). Policy 10.2.2.2 and 10.2.2.3 require buildings, structures, storage and use of hazardous substances, and earthworks - large scale and vegetation clearance to be set back from water bodies an adequate distance to enable the biodiversity and natural character values of coastal and riparian margins to be maintained or enhanced and to minimise erosion.

In considering a discretionary activity application for mining, circumstances that support an application include:

- The activity will be set back a sufficient distance from its own [property](#) boundaries to avoid or adequately mitigate any adverse effects from noise, odour, dust, contaminants or visual effects on surrounding properties (Rule 16.11.2.4(h)). The project achieves this.
- Management plans or other mitigation measures will be used to adequately manage any adverse effects from dust, vehicle movements and operating noise on surrounding properties (Rule 16.11.2.4(h)). OceanaGold already operates under such management plans and will continue to do so.
- There will be no adverse effects in terms of land instability (Rule 16.11.2.4(k)). The extension project is aimed at improving the stability of Coronation North pit so achieves this desirable outcome.

In considering a discretionary activity application for mining, the Council will consider:

- Effects on amenity, including the effects of vehicle movements on the [site](#) as well as any significant changes to the number or nature of vehicle movements on the adjoining [road](#) (Rule 16.11.2.4(l)). Vehicle movements on site and on public roads will not change during the extension project.
- the locational constraints of the resource and logistical and technical access requirements (Rule 16.11.2.4 (m)) and that is a relevant consideration here.
- Effects on rural character values and amenity, including rehabilitation measures that ensure that final landforms will be minimised by blending final contours with surrounding landforms to achieve as natural appearance as possible and by providing for the establishment of vegetation cover appropriate to the local character (Rule 16.11.2.4(n)). OceanaGold's existing rehabilitation plan for waste rock stacks will achieve this outcome.

In relation to earthworks in the rural zone, section 8A of the 2GP now requires the Council to consider the effects on the values specified in Objective 16.2.3 and the effects on the rural character values identified in Appendix A7.

Relevant to the permitted baseline, when compared to the operative DDP the 2GP has been changed but it does not appear to make farming activities significantly more restrictive in the High Country Rural Zone and the Rural Zone (section 16). Both stock grazing and farming are promoted by policies and objectives and are permitted activities. Vegetation clearance is a permitted activity but must be in accordance with the Vegetation Clearance Standards (for example, 10.3.2.3: clearance must not occur within 20m of any wetland identified in Appendix A1.2). Indigenous vegetation clearance is permitted and must also be in accordance with the Vegetation Clearance Standards (for example, rule 10.3.2.A maximum area of clearance for High Country Rural Zone (within the Taieri Ridge and Mare Burn mapped area, which this site appears to be within) is 1,00m² for non-tussock species, and 1,000m² for tussock species).

4.9 Waitaki District Plan

4.9.1 Takata Whenua Values

The WDP seeks to protect and, where appropriate, enhance waahi tapu, waahi taoka, cultural property and mahinga kai (Objective 1.3.4(B) and Policies 1.3.5(B)). As these matters have previously been assessed in CIAs prepared for Coronation and Coronation North projects and OceanaGold continues to consult with Nga runanga regarding these values, it is considered that the extension project is consistent with these provisions in the WDP.

4.9.2 Nature Conservation Values

Policies relating to the management of conservation values under Issue 8 of the WDP apply to the Project. The WDP has an objective to maintain biological diversity, nature conservation values and ecosystem functioning by protecting section 6(c) RMA areas and maintaining other areas with particular nature conservation values (Objective 16.9.3(1)). Another objective focuses on the maintenance or enhancement of the quality of water, wetlands, and rivers and their margins and the protection of them from inappropriate development (Objective 16.9.2(2)). Further, a policy recognises that areas, other than section 6(c) areas, may have conservation values in terms of maintaining connectivity and providing important habitat for species reliant on patchworks of indigenous vegetation (e.g. birds and lizards) (Policy 16.9.3(4)). Other policies include those seeking to manage the effects of use and development on the natural character of wetlands, rivers and lakes and their margins, and those noting that the WDC takes the opportunity to

promote the retention of indigenous vegetation and habitat when considering resource consent applications (Policy 16.9.3(7), (9) and (10)).

The Project will have some effects on terrestrial ecology and wetland values. The scale of the effects have been assessed in the context of an existing operating mine, and the broader environment, and in comparison to the effects that are already allowed by the existing consented baseline. Overall it is considered that the effects are of lesser consequence than those permitted by the existing consented baseline. Through the avoidance of existing consented land, an overall net gain in biodiversity values is expected from the Project.

4.9.3 Heritage Values

Under the WDP district wide policies on heritage an objective is to seek the conservation and enhancement of the heritage values of the district, including historic places, waahi tapu sites, and archaeological sites, in order to preserve and manage the character and history of the district (Objective 2.3.1(A)). However the associated policies focus on identifying and protecting important heritage items in the WDP and there are no heritage items listed in Appendix B of the WDP that are proposed to be modified by the Project.

Another policy in the WDP seeks to ensure that all development proposals in the vicinity of recorded waahi tapu and archaeological sites are notified to the takata whenua and the NZHPT (Policy 2.3.2(2)). There are no such known sites but OceanaGold operates accidental discovery protocols that would require notification of any discovery. As such it is considered that OceanaGold has satisfied the intent of this policy.

4.9.4 Natural Hazards

Part 2, section 4 of the WDP addresses the issue of seismic risk. Expert reports have assessed the geotechnical risk associated with the proposed Pit Extension and waste rock stack and concluded that there is no additional increase in risk profile. Therefore it is considered that the project is consistent with the policies in this part of the WDP.

4.9.5 Transport

Part 3, section 12 of the WDP contains transport and car parking rules which seek to achieve safe and efficient transport systems within the district. As these rules were all addressed by the previous Coronation and Coronation North projects, and the extension project does not alter any transport or roading but rather continues to operate on the existing haul road using the existing vehicle crossing, it is considered that there will be no change to the safe and efficient movement of traffic.

4.9.6 Rural Amenity

Part 2, section 16.5 relates to the protection of rural amenity. The WDP has the objective of providing a level of rural amenity that is consistent with the range of activities anticipated in rural areas – and OceanaGold considers that necessarily includes mining activity that is provided for in the mining zone and which has been operating in this rural environment for over 28 years. The intent of the WDP is to ensure that activities do not create “unacceptably unpleasant living or working conditions for the District’s residents and visitors, nor a significant deterioration of the quality of the rural environment” (Objective 16.5.1(4)). Policy 16.5.2(4).3 is relevant as it provides for performance standards to be applied to activities that may cause unpleasant conditions for other people in the rural community. OceanaGold already operates under consent conditions that require it to manage and control noise and dust within specified parameters and it intends to continue to do so.

4.9.7 Hazardous Substances

An objective within the WDP is to avoid or mitigate adverse environmental effects arising from storage, transportation and disposal of hazardous substances (Part 2, Objective 12.2.2 and associated policies 12.2.3). The MGP has been operating for over 28 years and there have not been any significant issues over the use, transport or storage of hazardous substances on the site. The HSNO Act requires a range of safety and environmental standards to be met at the site, which OceanaGold does. Accordingly, it is considered that the extension project continues to be consistent with the objectives and policies of this part of the WDP.

4.10 KTKO NRMP 2005

It is recognised that manawhenua have both a spiritual and physical relationship with the natural environment and that traditional Maori values are closely linked to the environment. OceanaGold consulted with Kai Tahu ki Otago Ltd (now Aukaha), as representative of all affected manawhenua, and commissioned a cultural impact assessment on the Coronation and then the Coronation North Project. The CIA addressed all of the relevant assessment matters raised within the KTKO Natural Resource Management Plan 2005 (NRMP). OceanaGold does not consider that any new issues arise in relation to the extended area of the pit or amended waste rock stack proposed in this application.

The NRMP has been developed to:

- Provide the principal planning document for Kai Tahu ki Otago;
- Provide information, direction and a framework to achieve a greater understanding of the natural resource values, concerns and issues of Kai Tahu ki Otago;
- Provide a basis from which the management of the natural, physical and historic resources of Otago is further developed.
- Provide the basis, but not substitute, for consultation and outline the consultation expectations of Kai Tahu ki Otago.

The sections of the KTKO NRMP relevant to the Coronation North Extension Project address:

- Preventing deterioration of water quality;
- The effect of dams on cultural values;
- Ensuring only the minimum amount of water is abstracted;
- Managing instream works to protect nohoanga, mahika kai, fish passage, habitat values;
- Protecting wetlands;
- Encouraging re-vegetation of high altitude ecosystems using indigenous flora of local origin;
- Promotion of Accidental Discovery protocols and other measures to ensure protection of waahi tapu;
- Protection of cultural landscapes.

Overall, the Coronation North Extension Project is considered to be generally consistent with the policies of the NRMP. OceanaGold is consulting on the Extension Project with Aukaha to identify and address concerns (if any).

5 EXISTING ENVIRONMENT

The vegetation communities in the Coronation North Project area have been described as mainly narrow-leaved tussock grassland, with limited bluff vegetation associated with rock tors and outcrops, and gully slope matrix vegetation. This environment has been highly modified through pastoral land use. This includes the planting of exotic pasture species, burning of tussock, fertiliser application and the breaking in of land through stock management and grazing.

Figure 1-2 shows the existing landforms as an underlay to the proposed Project Elements of the Coronation North Extension, and includes images of the existing Coronation North and Coronation Pits and Waste Rock Stacks, whilst the current consented footprint of these landforms is shown in Figure 1-3. Because there are existing implemented consents authorising the Coronation North and Coronation Projects, these form part of the existing environment and take into account the mitigation planned and implemented for the Coronation North and Coronation Projects including, but not limited to:

- Plant rescue and relocation for species of concern;
- Establishment of additional lizard stacks for the purposes of research;
- Establishment of Covenants in the Highlay Hill and Island Block;
- Payment into the Habitat Enhancement Fund;
- Progressive Rehabilitation of the WRS in line with rehabilitation objectives which consider long term and short term stability, return to original conditions, visual integration into the surrounding landscape and management of weeds;
- Management and monitoring of amenity effects such as noise, dust, airblast and vibration;
- Management of surface waters in line with the Erosion and Sediment Control Plan;
- Reinstatement of public roads effected by the mine as part of the cessation of mining activities;
- Continuing to implement the Accidental Discovery Protocol, as part of chance finds associated with archaeology and heritage.

Therefore, it is only those additional effects, over and above those which have been consented, which should be considered. It should also be noted that as the Coronation North Extension Project has led to a redesign, the assessment of effects is not only based on negative effects, but also positive effects associated with relinquishment of already consented, but not disturbed, areas within the Coronation North WRS.

The majority of the MGP is situated within the takiwās of Kāti Hūirapa Runaka Ki Puketeraki and Moeraki. Portions of the Coronation Project and the majority of the Coronation North Project fall within the takiwā of Otakou.

OceanaGold, Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki and Te Runanga o Otakou are parties to a Protocol of Engagement signed in July 2018. Under the Protocol the four parties agree to develop a sincere and honest practice of sharing of information to provide for a mutual education to promote a greater knowledge of the operation of the MGP and an understanding and respect for the spiritual and cultural values and customary rights of the whanau and hapu represented by Nga Runanga.

Cultural Impact Assessments (CIA) have been completed for the Macraes Phase III expansion and for the Coronation and Coronation North Projects.

There are existing diesel fuelling facilities in place at Coronation North for refuelling of the heavy vehicle mining fleet. In addition explosives are used as part of the blasting of the open pit areas.

In relation to the Ministry for the Environmental Hazardous Activities and Industries (HAIL) List, the MGP falls under Item D4 "Metal extraction, refining and reprocessing, storage and use, Metalliferous ore processing including the chemical or physical extraction of metals, including smelting, refining, fusing or refining metals". This is mainly in relation to the MGP Processing Plant area and tailings storage facilities.

6 ASSESSMENT OF ENVIRONMENTAL EFFECTS

6.1 Terrestrial Ecology

An initial assessment of the terrestrial biodiversity was undertaken by Dr Mike Thorsen for the Coronation North Project on the 16th of December 2015, 7th, 14th and 21st January 2016.² This information was presented as part of the joint ORC, WDC and DCC Coronation North hearing.

In preparation for the Coronation North Extension Project a further terrestrial biodiversity assessments were undertaken by Dr Mike Thorsen to extend the study area to include the extended Coronation North Pit footprint in July 2018 (refer **Appendix A**) and the newly designed Trimbells WRS and 'give up' area in November 2018 (refer **Appendix B**). Findings are detailed below under the appropriate headings. It is acknowledged that the survey work was conducted during winter for the Pit Extension and therefore was not ideal for identification of plants or herpetofauna, however the original Coronation North EIA which encompasses the extension area was undertaken in summer

6.1.1 Flora

Based on the Coronation North EIA and confirmed in the subsequent survey work the following habitat types and areas were identified within locality of the Pit extension:

- Short tussock grassland;
- Shrubland;
- Basalt Contact Seepage Wetland;
- Bluff vegetation; and
- Riparian herbfield & sedgeland.

The Trimbells WRS is composed entirely of narrow leafed grassland 50% ground cover that is recovering from recent burning.

In the footprint of the Pit Extension eight plant species were identified of interest, with seven of those five being registered on the recently updated New Zealand Threat Classification System ("NZTCS") threatened species list. These are *Aciphylla subflabellata*, *Anthosachne falcis*, *Carmichaelia petriei*, *Deyeuxia quadriseta*, *Discaria toumatou*, *Epilobium insulare* and *Leptinella pusilla*, and are all classified as At Risk – Declining. The eighth species of interest is *Oleria bullata*, identified as a 'Threatened Plant' in Appendix 16A of the DCC's District Plan

Of this list of nationally threatened species, the following plants were not identified in the original Coronation North EIA:

- desert broom *Carmichaelia petriei* - widespread in natural vegetation areas of the Macraes Ecological District ("Macraes E.D.");
- inconspicuous grass *Deyeuxia quadriseta* - the status of the inconspicuous grass in the area, and nationally, is poorly known due to its inconspicuous nature;
- small button daisy *Leptinella pusilla* – known from at least eleven sites in the Macraes E.D.; and
- matagouri *Discaria toumatou* – very common throughout most of the natural vegetation areas of the Macraes E.D.

In the original Coronation North EIA, the ecological importance of the dwarf wheatgrass *Anthosachne falcis* was identified as moderate-high on the basis of its naturally uncommon conservation status and discovery

² Reports produced relevant to Coronation Pit (not Coal Creek Dam) were: Coronation North Ecological Impact Assessment, April 2016 [Appendix 6a Coronation North AEE]; Clarifications regarding Coronation North EIA, 23 May 2016 [Appendix 6b Coronation North AEE]; Impact Management of Project Ecological Effects, May 2016 [Appendix 22 Coronation North AEE]. Copies of these reports can be provided on request.

in the Macraes area³. Plants of this species are scattered in the extension area and the surrounding Coronation area.

The inconspicuous grass *Deyeuxia quadriseta* was noted at one locality of the Pit extension, outside of the unconsented area. This species is a new addition to the Threat list. It has been noted at a few localities in the Macraes E.D., but its status in the area (and nationally) is poorly known due to its inconspicuous nature.

Small-leaved shrub daisy *Oleria bullata* was identified in the original Coronation North EIA with an ecological importance assessed as low on the basis of its rarity within the DCC boundary, but it was noted that although the species is rare within DCC it is not a nationally rare species or rare within the Macraes E.D.⁴ The species is widespread within the Macraes E.D.

The only species of interest within the unconsented area of Trimbells WRS was the At Risk – Declining, matagouri *Discaria toumatou*.

6.1.2 Avifauna

The composition of avifauna is likely to be the same as that described in the Coronation North EIA. Pipits (*Anthus novaeseelandiae*) are the only species of interest that might have used this area, but were not found in the Pit Extension of the unconsented Trimbells WRS footprints.

6.1.3 Herpetofauna

The composition of the herpetofauna is likely to be the same as described in the Coronation North EIA, with probable habitats for the Declining korero gecko *Woodworthia* "Otago/Southland large" and Not Threatened McCann's Skink ((clade 4 genotype). However there were no areas of lizard habitat thought to be significant identified during these surveys.

6.1.4 Ecological Significance and Mitigation

The additional impacts of the Pit extension and the unconsented area of Trimbells WRS, beyond those that are already consented under the Coronation North consents, include:

- The loss of 33.14 ha of narrow-leaved tussock grassland, 12.42 ha of short tussock grassland, 1.66 ha of shrubland, 1.33 ha of bluff vegetation and 0.64 ha of riparian herbfield and sedgeland, all of mostly moderate quality;
- The 1.48 ha of basalt contact seepage wetlands. These wetlands were identified and assessed in the Coronation North Ecological Impact Assessment. Impacts on the wetlands due to changes in hydrological conditions were assessed as high, and the agreed mitigation package for Coronation North took this effect into account.
- The loss of the flora and fauna that inhabits these communities;
- Loss of some plants of six plant species, and the loss of many plants of matagouri, classified as Declining in the NZ Threat Classification System;
- The loss of some plants of *Olearia bullata*, a plant listed as threatened by the Dunedin City Council;
- Probable loss of some individuals of the korero gecko classified as Declining in the NZ Threat Classification System;
- Probable loss of some individuals of the Not Threatened McCann's skink.
- Loss of c. 36 ha of moderate quality habitat for pipit, but which is not currently likely to be used due to disturbance from existing mine activities.

³ Coronation North Ecological Impact Assessment, April 2016 [Appendix 6a Coronation North AEE] page 67

⁴ Ibid, page 94

Dr Thorsen does not consider the additional loss from the Coronation North Extension to materially alter overall the stated impact of the Coronation North Project. Whilst some of the vegetation at this site is categorised as significant under the criteria in the ORC Regional Plan and DCC District Plan as it is inhabited by two to four rare species, this narrow leaved tussock grassland is not considered a rare vegetation community, and the tussock grassland at Coronation North has probably been impacted by anthropogenic process such as Maori burning of eastern South Island dryland forest and influence from agricultural practises such as burning and grazing. Overall, while the Coronation North Extension project will have an adverse, direct, permanent, and irreversible local impact on terrestrial ecology, the magnitude of the project's impact on the areas vegetation at a local scale is assessed as moderate, and at a national level as moderate.

As part of a mitigation package for effects of the Coronation North Extension project, OceanaGold proposes to set aside an area of previously consented footprint of the Coronation Waste Rock Stack. This area, which has previously been mitigated as part of the Coronation North Project consent, consists of 52.5ha within the limits of Area B & C of the consented waste rock stack. It is noted that the original decision to stage the waste rock stack was based on the higher biodiversity values contained within the areas B & C, when compared to Area A and to avoid these values if possible.

The detailed scheduling of waste movement to allow for pit backfilling and the design of the Trimbells WRS has resulted in a modified footprint as described in section 1.3. Surveys of the area set aside, or 'give-up' area, were conducted on 23rd November and 14th December 2018, by Dr Thorsen and are detailed in the file note found in **Appendix B**. Despite the conditions of the survey being more favourable for the proposed set aside area, when compared with the unconsented areas of the Pit Extension and Trimbells WRS, the ecological features were found to be of higher value. In addition, by shifting the WRS further up the catchment, it becomes more removed from the core of the Recommended Area of Protection, or RAP (as shown in Figure 6-1), which was identified in the original Coronation North consent, thus reduce the fragmentation associated with this area.

Dr Thorsen concludes that the set aside area of the consented waste rock stack, would 'address the effects of the Coronation North Extension in an ecologically meaningful way so that there is a net gain to biodiversity'. Dr Thorsen goes on to note that the only exception to this is the effect to the basalt contact seepage wetland found in the Pit Extension and recommends the rehabilitation of existing wetlands found in the Highlay Hill Covenant.

Therefore, the mitigation package proposed for effects to terrestrial biodiversity from the Coronation North Extension Project will include:

- Avoidance of 52.5ha of existing consented footprint with higher biodiversity value than the proposed footprint; and
- Rehabilitation of basalt contact seepage wetlands found in existing Highlay Hill Covenant;

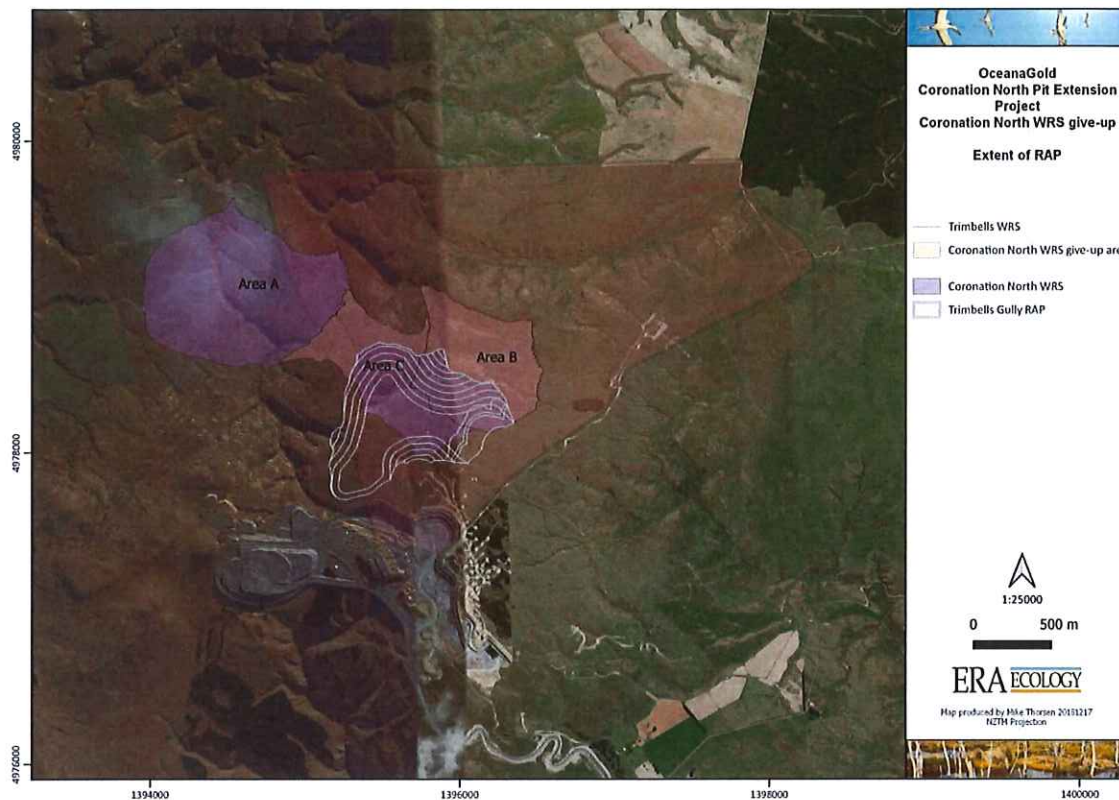


Figure 6-1 Location of Trimbells WRS with respect to RAP

6.2 Aquatic Ecology

An ecological assessment of the impact area of the Pit Extension was conducted by Ryder Environmental Limited ("Ryder") as a desk top exercise and is attached as **Appendix C**. Ryder assessed the project extension area against information gathered for both the Coronation and Coronation North Projects. Their findings were that only a small area of creek will be disturbed by the Coronation North Pit Extension and this is located in the upper reaches of Maori Hen Creek. The amended footprint being the focus of these applications would therefore not constitute additional disturbance in this catchment.

The design of Trimbells WRS has shifted the area of disturbance, further up Trimbells Gully Tributary. The Coronation North Project AEE indicated that most of Trimbells Gully Tributary catchment would be altered, primarily due to the placement of waste rock in the Coronation North WRS. A GIS analysis of Trimbells Gully (as shown in Figure 6-2 Affected & Avoided Streams in Trimbells) indicates that the new waste rock stack will affect approximately 2.02km of order 1 stream, almost all of which lies within the consented Coronation North WRS footprint. The length of order 1 stream already consented that would be avoided through the establishment of the set aside would be 2.00m, thus indicating a net gain in overall stream length.

The Pit Extension will affect tributaries that would not support stable aquatic habitat and contribute only a small proportion of flow to Maori Hen, and the Mareburn and the overall effect of Trimbells WRS will be to increase the overall stream length within Trimbells Gully. Therefore the effect of the Coronation North Extension proposal on aquatic ecology can be regarded as less than minor and no further mitigation is offered.

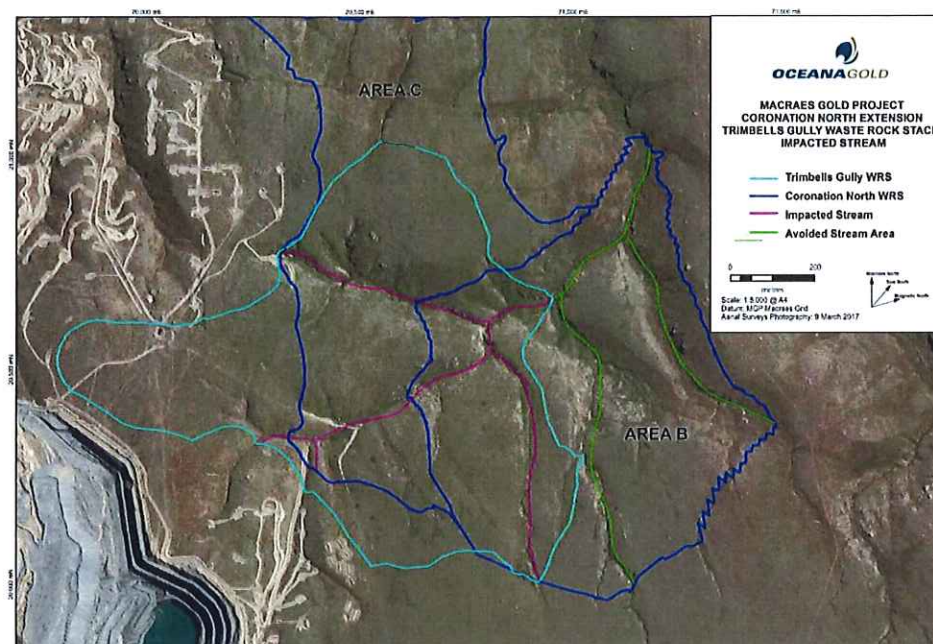


Figure 6-2 Affected & Avoided Streams in Trimbells Gully

6.3 Geotechnical Assessment

The Coronation North Pit extension and the newly designed Trimbells Waste Rock Stack have been assessed geotechnically by Pells Sullivan Meynink (PSM) and the reports can be seen in **Appendix D**. As with other infrastructure at MGP, the assessment takes into account seismicity as the key natural hazard. In the first report (dated 22nd August) PSM confirm that the Pit Cutback will not lead to any change in the geotechnical risk profile of the Coronation North Pit. The second report (dated 28th November 2018) confirms that the proposed location and design of the Trimbells Waste Rock stack is suitable and that the waste rock stack does not adversely impact on the stability of the adjacent Coronation and Coronation North open pits. PSM's assessment is there will be no material changes between the interaction of the pit and WRS than existed and were assessed⁵ when Coronation North was originally consented, and that there will be negligible interaction between the pit and the WRS.

From this, it can be inferred that the extension of the pit will not impact upon the waste rock stack, and that no geotechnical hazards will be left as a result of mining in the area. This should give assurance that the extensions can be safely mined and the area rehabilitated and left stable post-closure.

⁵ PSM Impact of the Coronation and Coronation North Waste Rock Stack on open pits, 12 April 2016 [Appendix 19 Coronation North AEE]. A copy of this report can be provided on request.

6.4 Heritage and Archaeology

The Macraes District consists of a complex and extensive heritage landscape. There are a variety of historic site types, representing farming, alluvial and quartz mining operations. Since the early 1990s a vast amount of archaeological and heritage assessments and inventory work has been undertaken.

The Coronation North Project included a comprehensive review and survey of the Project footprint and surrounds. Heritage sites were identified relating to historical mining activities in the lower Trimbells Gully and Mare Burn streams. A review of these findings show that no heritage sites were found within the footprint of the Coronation North Extension.

OceanaGold has an "Accidental Discovery Procedure" which outlines the steps to stop work and notify the appropriate authorities. In addition a heritage management plan is in place to assist in identifying and protecting significant archaeological sites. The Management Plan was developed with the objective of ensuring that *"identified heritage sites (including archaeological sites both pre- and post- 1900 in origin) would only be modified or destroyed where no other reasonable options exists"*. Within the Management Plan criteria for the assessment of archaeological and heritage values are outlined.

No additional heritage sites, or sites of significance have been identified within the Coronation North Extension area and so it is considered that no update to the Heritage Management Plan is required.

6.5 Amenities

Effects on amenities (i.e. noise, vibration, airblast, lightspill and dust) from the Coronation North Extension Project will not result in measurable changes from that experienced for the existing Coronation North Project based on:

- Mining activities will continue to be conducted in the same geographical location;
- No planned increase in mine production rate to the current 5 MT per annum;
- No planned additional mining fleet to the existing available equipment; and
- No additional haul road movements.

Effects on amenities will continue to be managed using existing processes to preferentially avoid and, where avoidance is not possible, mitigate duration and/or intensity of those effects.

Following concerns raised by an affected party, Craig and Erin Howard, regarding night time noise disturbance, OceanaGold have committed to not hauling ore at night from the Coronation North/Coronation mining complex to the Processing Plant, until such time as an agreement can be reached between the Howards and OceanaGold.

6.6 Landscape and Visual

The landscape and visual impact of the Coronation North Extension has been assessed by David McKenzie of WSP Opus. Using the consented landscape as the baseline⁶, Mr McKenzie has taken into account all the Project Elements identified in the Project Description to assess the visual effects of the development as detailed in the report in **Appendix E**. The assessment finds that although the changes to the waste rock stack will not affect the consented landscape and visual effects, however visually, the Pit Extension will be balanced by the Pit Backfill, and Pit Backfill will have a positive landscape effect in negating part of the pit void and re-forming the northern aspect of the Sisters Peaks promontory and a positive effect on the view from Longdale Road (as shown in Figure 6-3 Simulation of Coronation North Pit Extension from Longdale Road).

The assessment concludes the effects on landscape and visual from the Coronation North Extension are no more than minor. On this basis no further mitigation is proposed.

⁶ Oceana Gold (NZ) Ltd MGP Coronation North Project Landscape and Visual Assessment, April 2016 [Appendix 16 Coronation North AEE].



Figure 6-3 Simulation of Coronation North Pit Extension from Longdale Road

6.7 Hazardous Substances and HAIL

The Coronation North mining area currently contains a 10,000lt portable double skinned, diesel tank. No explosives are stored within the Coronation North mining area.

In relation to the Ministry for the Environmental Hazardous Activities and Industries (HAIL) List, the MGP falls under Item D4 "Metal extraction, refining and reprocessing, storage and use, Metalliferous ore processing including the chemical or physical extraction of metals, including smelting, refining, fusing or refining metals".

In relation to the National Environmental Standard for Assessing and Managing Contaminants in Soils, the proposal does not involve subdivision of land, change in use of the land, disturbance of contaminated soil or removal or replacement of a fuel storage system. The processing of ore at the MGP processing plant and disposal of tailings (HAIL type activities) are an existing use and appropriate resource consents are held for these activities.

6.8 Effects on Tangata Whenua Values

The maintenance of natural landscapes, protection of waahi tapu and waahi taonga, for taonga species and impacts on the mauri of the land, water and air are all of cultural importance. Cultural Impact Assessments have been completed for the Macraes Phase III and Coronation North Projects.

6.8.1 Culturally Important Landscape Features

Previous consultation and assessments undertaken in the vicinity of the Macraes Mine have not identified any culturally important landscape features. It is unlikely there will be adverse effects on culturally important landscape features.

6.8.2 Taonga Species

Taonga species are native birds, plants and animals of special significance and importance to iwi and it is important that these resources are treated with care.

As identified in the Ecological Assessments undertaken by Dr Mike Thorsen (see Appendix A), 19 indigenous flora species of interest were identified in the unconsented area, along with an indication of possibly two indigenous bird species and three indigenous reptile species. Whilst the consented area that will be set aside hosts at least 22 plant, 3 reptile and 1 bird species.

In addition the proposed Trimbells area provides improved connectivity for indigenous species within the set aside due to its closer proximity to existing infrastructure.

6.8.3 Sites of Significance, Waahi Tapu and Waahi Taonga

OceanaGold has commissioned extensive archaeological surveys of its entire project area since commencement of exploration and mining in the area. While it is acknowledged that early Maori were known to have passed through the area no evidence of areas of significant interest was found within the proposed pit expansion area.

It is therefore unlikely the project will impact on any site of significance. However, it is possible that an unrecorded or unknown site may exist within the area and OceanaGold has an established “accidental discovery” procedure which is communicated to all earthworks staff.

6.8.4 Water

The protection and enhancement of the mauri of water is a primary natural resource management principle. Diversion, mixing of waters from different catchments and contamination are activities that negatively impact on the mauri of some waterways.

Mitigation will be undertaken by OceanaGold to ensure that the MGP operates through to the end of mine life, and in post closure phase, within the water quality compliance criteria for surrounding waterways that have been previously accepted by Iwi.

Preservation of wetlands have been identified in the NRMP. The Coronation North Extension is expected to result in the total loss of a small area of already significantly modified wetland. In order to remedy this, OceanaGold proposes the rehabilitation of similar wetlands within the Highlay Hill Covenant (see section 6.1.4).

The proposed Pit Expansion is not expected to have any discernible effect on flow rates in Mare Burn Creek or the Taieri River.

6.8.5 Air

Dust will continue to be managed at the MGP under current air discharge consents. The existing air discharge consent for the Coronation North Extension includes the area of the proposed expansion and the activities proposed are similar. Extensive dust monitoring is in place already and the pit expansion proposal is not expected to change this. The pit expansion proposal will not have any adverse air quality effects that are more than minor.

6.8.6 Conclusion

The Cultural Impact Assessment prepared to cover the Coronation North Project should adequately cover the proposed Coronation North Extension.

7 PROPOSED MONITORING

No changes are proposed from the current monitoring being conducted under the Coronation and Coronation North consents. This includes monitoring of noise, airblast, vibration, dust, water quality and quantity, as well as rehabilitation.

8 ALTERNATIVES

The Coronation North Extension has undergone a number of iterations which included detailed design of additional areas required around the Coronation North Pit, scheduling of waste rock movement, the Pit Backfill and the redesign of the Coronation North Waste Rock Stack to form the proposed Trimbells Waste Rock Stack. Through the optimisation of design, considerable effort has been made to identify benefits across a range of values associated with the physical and biological environment.

9 AFFECTED PARTIES & CONSULTATION

In determining the consultation requirements for the Coronation North Extension Project, OceanaGold has considered the nature of the effects of project activities previous submissions and appeals – particularly those relating to Coronation and Coronation North – and feedback and concerns raised by stakeholders and Treaty Partners on general operational activities.

In undertaking the above analysis, the following parties were considered but ultimately not deemed to be affected, as follows:

- Macraes Community Incorporated (MCI) – Submitted in opposition to, and then appealed, the Coronation North Project. Although the appeal was broad the key issues for the MCI related to the Macraes Dunback Road, the use of covenants for ecological mitigation, and the standard and rate of progressive rehabilitation. The Macraes Dunback Road has subsequently been refurbished and a consent application recently lodged with Waitaki District Council to further improve the road alignment. Covenants are not being considered for ecological mitigation related to the Coronation North Extension project at this stage. On rehabilitation, OceanaGold has committed to a three year program for non-operational rehabilitation and a specific engagement project is underway to better incorporate local farmers' expectations on rehabilitation. The rehabilitation for Coronation North extension project will be the same as is applied site-wide at the MGP and will incorporate any changes that result from the engagement project.
- Mr Neil Roy – Mr Roy has provided regular feedback on road related issues for MGP. The Coronation North Extension will not result in changes to roading alignments and management of Golden Point Road will continue to be implemented for the additional four months of operation required for the Coronation North Extension.
- Heritage New Zealand – No sites of significance were identified within the footprint of the Coronation North Extension, based on the Coronation North Project Heritage assessment, and no subsequent sites have been identified through the Accidental Discovery Protocol. Should any sites be discovered during operations within the extension area the protocol would apply and HNZ would be notified.

9.1 Affected Parties

Given the narrow nature of the effects of the Coronation North Extension Project, OceanaGold considers the application could be appropriately limited notified. The following parties have been identified by OceanaGold as being affected by the Coronation North Extension Project:

- Department of Conservation
- Kati Huirapa ki Puketeraki, Moeraki and Otakou
- Craig and Erin Howard

A summary of the affected parties interests and the level of consultation undertaken are presented below.

9.1.1 Department of Consultation (DOC)

The Department of Conservation submitted on the Coronation North Project, seeking a decision that appropriate conditions were implemented to address effects, compensate or offset to achieve no net loss in biodiversity, limit local land use disturbance where possible and feasible, and that the appropriate regulatory approvals were granted to kill, disturb, or move wildlife. Through the consenting process consultation was undertaken with DOC which resulted in design modification, an agreed mitigation package and consent conditions acceptable to both parties.

Consultation with DOC on the Coronation North Extension commenced on 31st October 2018, during a site visit. Representatives of DOC briefly visited the site of the Pit Cutback, and the idea of avoiding the already consented footprint within the WRS was discussed and received positively as a concept. DOC have requested, and subsequently received copies of the Terrestrial Ecology Studies (as presented in Appendix A & B). Further consultation on the terrestrial ecology effects is expected to be undertaken.

9.1.2 Kati Huirapa ki Puketeraki, Moeraki and Otakou

OceanaGold acknowledges, understands and respects that Nga Rūnanga - Te Rūnaka o Moeraki, Kati Hūirapa Rūnaka ki Puketeraki and Te Rūnaka o Ōtākou maintains the Mana Whenua as Tangata Whenua of the associated lands regarding this application.

As they are the kaitiaki (guardians) we understand that the cultural landscapes, taonga species, customary fish species, māhika kai, biodiversity, historical resources are of significance for Nga Rūnanga.

OceanaGold has an existing relationship with Nga Rūnanga whereby a Memorandum of Understanding with Puketeraki and more recently a Protocol of Engagement with Nga Rūnanga has been developed to work collaboratively in developing and implementing initiatives to address any adverse impacts of the MGP on the cultural values within the receiving environment.

As an affected party OceanaGold has held consultation meetings with "Aukaha – Mana Taiao" who have been mandated by Te Rūnaka o Moeraki, Kati Hūirapa Rūnaka ki Puketeraki and Te Rūnaka o Ōtākou to engage in discussions. Initial discussions and site visits are currently being conducted and we await the formal response and will provide this in due course once it is received.

9.1.3 Craig and Erin Howard

Craig and Erin Howard reside on Horse Flat Road nearby the haul road. Acoustic mitigation measures were applied to their property as a result of consenting of the Coronation Project. The Howards initially submitted on the Coronation North Project regarding noise from the mining operation, drinking water quality and the increase in sulphate in the surrounding water, visual pollution, increased dust, and increased traffic on the local roading infrastructure. Subsequent to the commencement of operational activities for the Coronation North Project, OceanaGold has received a number of complaints from the Howards relating to noise associated with night timing hauling of Ore from Coronation/Coronation North Pits to the Process Plant from the Howards. Since October 2018, OceanaGold has adopted a 'no hauling at night policy' in order to avoid night time noise effects on the Howards. The policy will remain in place until such time as an agreement can be reached with the Howards on night time hauling.

The Howards have been informed of the proposed consent application for the Coronation North Extension and will be provided with a copy of the lodged AEE and application.

10 PROPOSED CONSENT CONDITIONS

10.1 Otago Regional Council

The Otago Regional Council issued a number of consents in 2016 for the Coronation North Project. This was for a range of activities including the formation of pit lakes, water diversion, discharge to land and also discharge to water. Within Coronation North Extension Project no consent condition changes are being sought. This application will however vary the maps annexed to the consent documents.

10.2 Dunedin City Council

The Dunedin City Council issued land use consent for Coronation in 2013 and for Coronation North in 2016. The Coronation consents were amended with the application for the Coronation North Project in 2016. The consents issued by the Dunedin City Council are LUC-2016-234 & LUC-2013-225A.

It is proposed that the existing land use consent (LUC-2013-225A) be varied to recognise the relinquishment of the set aside area within the Coronation North WRS. In addition a new land use consent be issued which recognises the additional unconsented land associated with the Pit Cutback and the Trimbells WRS.

Although OceanaGold has not submitted any proposed consent conditions with this application it is considered appropriate to achieve consistency across MGP operations by applying consent conditions that are the same as, or very similar to, the existing consent conditions for Coronation and Coronation North projects. OceanaGold would be open to providing the Council with draft proposed consent conditions for the new land use consent on request or alternatively working with the Council to formulate them.

10.3 Waitaki District Council

The Waitaki District Council issued land use consent for Coronation in 2013 and for Coronation North in 2016. The Coronation consents were amended with the application for the Coronation North Project in 2016. The consents issued by the Waitaki District Council are 201.2016.779 and 201.2013.360.1. The Coronation North Extension Project does not seek any consent condition changes apart from varying the maps annexed to the consent documents to show the project extension areas, and to update naming conventions throughout the consents to reference the Coronation North Extension Project.

11 CONCLUSION

This assessment of environmental effects has identified and evaluated potential effects on the environment of the proposed Coronation North Extension Project and demonstrated that the extension is able to be undertaken with minimal adverse environmental effects.

In reaching this conclusion OceanaGold has been guided by the expert technical reports that are submitted in support of these applications.

The activities for which new resource consent and variations to existing consents are sought are consistent with the purpose and principles of the Resource Management Act 1991 and will promote sustainable management of resources. Accordingly, it is considered that requested resource consent and variations to existing consents should be granted for the Coronation North Extension.

APPENDIX A *TERRESTRIAL BIODIVERSITY OF CORONATION NORTH PIT EXTENSION,
TRIMBELLS WRS AND IMPACT OF EXTENSION AND WRS – ERA ECOLOGY,
DECEMBER 2018*