

Objectives and Policies assessment details

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Table 1 National Policy Statement for Freshwater Management 2022

Objective / Policy Reference	Explanation	Comment
Objective		
Objective 2.1	<i>The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:</i> <i>(a) first, the health and well-being of water bodies and freshwater ecosystems</i> <i>(b) second, the health needs of people (such as drinking water)</i> <i>(c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.</i>	First, the effects on groundwater will be no more than minor as a result of project design and mitigation measures which protect groundwater quality from ingress of contaminants. There will be temporary adverse effects on the health and well-being of the Waikaka Stream and Shepherd's Creek. Each of the sections of stream that are temporarily diverted will be rehabilitated with riparian plantings, including a higher proportion of native species and cobble substrate, ensuring there will be long-term benefit to local surface water bodies. Second, the health needs of people will be unaffected by this proposal. Third, the proposal enables people to provide for their social and economic wellbeing as outlined in the AEE section 5.21. The Applicant is consulting directly with tangata whenua on cultural wellbeing.
Policies		
Policy 1	<i>Freshwater is managed in a way that gives effect to Te Mana o te Wai.</i>	The Applicant is consulting directly with tangata whenua in relation to the proposal. The protection of the health and wellbeing of freshwater has been incorporated by mitigating and remedying contaminants in discharges, undertaking diversion and earthworks activities in a manner that includes appropriate mitigation of effects, and designing the rehabilitation of the diverted stream channel with the health of freshwater, habitat values and indigenous species as a priority.
Policy 2	<i>Tangata whenua are actively involved in freshwater management (including decisionmaking processes), and Māori freshwater values are identified and provided for.</i>	The Applicant is consulting directly with tangata whenua and has made amendments directly to the proposal in response to feedback.

		The Applicant will continue to engage with tangata whenua through the consent process.
Policy 3	<i>Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.</i>	Effects on the wider catchment receiving environment have been considered in the assessment of effects. Overall, effects on the wider catchment will be less than minor.
Policy 5	<i>Freshwater is managed (including through a National Objectives Framework) to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.</i>	The proposal is expected to enable improvements to the water quality in the Waikaka Stream, through management of stock access and reconstruction of a completely cobble substrate (whereas the existing has areas of sediment cover).
Policy 7	<i>The loss of river extent and values is avoided to the extent practicable.</i>	The Applicant has thoroughly evaluated alternative solutions and deemed the proposed temporary stream diversions as the most practical option, ensuring no overall net loss of river extent or values. The proposed plan seeks complete rehabilitation of the diverted sections of channel to its former course while enhancing ecological values, flood carrying capacity, and habitat quality. Expert engagement will ensure successful implementation, retaining original sinuosity and alignment features of the channel and introducing a mix of native and introduced species to stabilise the channel and mitigate temperature increases. After the rehabilitated sections of channel have been fully established there is expected to be no net loss of river extent, and a net gain in terms of river values, facilitated by the enhancements proposed by the Applicant.
Policy 8	<i>The significant values of outstanding water bodies are protected.</i>	There are no significant values of outstanding water bodies to consider as part of this proposal.
Policy 9	<i>The habitats of indigenous freshwater species are protected.</i>	This is achieved by creating replacement habitat to compensate for the habitat lost during the period of work. Indigenous species will recolonise the diverted sections of channel following rehabilitation and re-establishment of indigenous plants and structural habitat features.
Policy 10	<i>The habitat of trout and salmon is protected, insofar as this is consistent with Policy 9.</i>	This is achieved by creating replacement habitat to remedy that lost. Fish will recolonise the Waikaka Stream and Shepherd's Creek.
Policy 11	<i>Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided.</i>	Freshwater within the affected catchments is not over-allocated and this proposal does not result in over-allocation. Water resources will

		be used and allocated efficiently, with reference to the assessment in section 5.4.2 of the AEE.
Policy 15	<i>Communities are enabled to provide for their social, economic, and cultural wellbeing in a way that is consistent with this National Policy Statement.</i>	The proposal enables the Applicant and local community to provide for their well-being in a way that is considered to be consistent with the NPSFW.

Table 2 National Policy Statement for Highly Productive Land 2022

Objective / Policy Reference	Explanation	Comment
Objective		
Objective 2.1	<i>Highly productive land is protected for use in land-based primary production, both now and for future generations.</i>	The proposal does not prevent long term use of the land for primary production. The productivity of the land is protected by various measures including rehabilitation criteria, pre-mining soil and productivity assessment and topsoil management procedures.
Policies		
Policy 4	<i>The use of highly productive land for land-based primary production is prioritised and supported.</i>	The land is currently used for land-based primary production and will be returned to that use on completion of mining.
Policy 8	<i>Highly productive land is protected from inappropriate use and development.</i>	The development does not meet the definition of inappropriate use and development as it is exempt by clause 3.9(2)(g), as outlined in the AEE section 6.2.2.
Policy 9	<i>Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land.</i>	The proposal is not considered to create any adverse reverse sensitivity effects on nearby land-based primary production activities.

Table 3 National Policy Statement for Indigenous Biodiversity

Objective / Policy Reference	Explanation	Comment
2.1 Objective		
Objective	<i>(1) The objective of this National Policy Statement is:</i> <i>(a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and</i> <i>(b) to achieve this:</i> <i>i. through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and</i> <i>ii. by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and</i> <i>iii. by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and</i> <i>iv. while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.</i>	The Applicant demonstrates a commitment to recognising the mana of tangata whenua as guardians of indigenous biodiversity through genuine consultation, notably with Hokonui Rūnanga, resulting in amendments to reduce the proposed activity's scale and redesigning the activity to reduce the environmental impacts. Further consultation with Hokonui Rūnanga is ongoing. The project design has been developed to ensure that any loss of indigenous biodiversity is remedied, with indigenous planting incorporated in the rehabilitation design and relocation of fish species from reaches affected by the works. It is acknowledged that the Waikaka Stream and Shepherd's Creek currently have little, if any, native riparian vegetation and the Applicant's proposal is expected to contribute a net gain to indigenous biodiversity through removal of weed species, provision of a cobble substrate and planting of indigenous species.
2.2 Policies		
Policy 1	<i>Indigenous biodiversity is managed in a way that gives effect to the decision-making principles and takes into account the principles of the Treaty of Waitangi.</i>	The project design has been developed with careful consideration of the affected environment, with the aim of prioritising ecological enhancement of the Waikaka Stream. The Applicant will continue working with Hokonui Rūnanga in progressing the development of the project detail.
Policy 2	<i>Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through:</i> <i>(a) managing indigenous biodiversity on their land; and</i> <i>(b) identifying and protecting indigenous species, populations and ecosystems that are taonga; and</i>	The Applicant will continue discussions with Hokonui Rūnanga and seek feedback on the taonga species and ecosystems in respect of this project.

Objective / Policy Reference	Explanation	Comment
	<i>(c) actively participating in other decision-making about indigenous biodiversity.</i>	
Policy 3	<i>A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.</i>	The Applicant has engaged various technical experts to undertake assessments to ensure there is sufficient technical information to enable an assessment of adverse effects on indigenous biodiversity.
Policy 4	<i>Indigenous biodiversity is managed to promote resilience to the effects of climate change.</i>	Advice will be sought from a suitably qualified person in respect of which species are suitable to plant in the riparian margins, to account for the effects of climate change. By removing weed species from the riparian margin, providing a cobble substrate, and planting indigenous species, the project is expected to contribute a net gain to indigenous biodiversity and support its resilience against climate change effects.
Policy 5	<i>Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.</i>	A joint application and processing by GDC and ES will enable integrated management across administrative boundaries.
Policy 6	<i>Significant indigenous vegetation and significant habitats of indigenous fauna are identified as SNAs using a consistent approach.</i>	No significant indigenous vegetation or significant habitats of indigenous fauna are identified in the project area.
Policy 7	<i>SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.</i>	The application site is not located in an SNA.
Policy 8	<i>The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.</i>	The project site is not situated within a SNA. While it is acknowledged there may be a temporary reduction in indigenous biodiversity, the proposed remediation measures are expected to meet the policy objective of at least maintaining, if not enhancing, indigenous biodiversity values.
Policy 9	<i>Certain established activities are provided for within and outside SNAs.</i>	The proposal is not an established activity.
Policy 10	<i>Activities that contribute to New Zealand's social, economic, cultural, and environmental well-being are recognised and provided for.</i>	The social and economic benefits of the proposal are identified in section 5.20 of the AEE. Input is being sought from Hokonui Runanga in respect of cultural well-being.
Policy 11	<i>Geothermal SNAs are protected at a level that reflects their vulnerability, or in accordance with any pre-existing underlying geothermal system classification.</i>	There are no geothermal SNAs relevant to this project.

Objective / Policy Reference	Explanation	Comment
Policy 12	<i>Indigenous biodiversity is managed within plantation forestry while providing for plantation forestry activities.</i>	There is no plantation forestry relevant to this project.
Policy 13	<i>Restoration of indigenous biodiversity is promoted and provided for.</i>	A fundamental principle of the project design is that the streams impacted by the mining activity will be restored and rehabilitated to at least the same, and preferably better habitat value, ecological value and flood carrying capacity, compared to the existing. Restoration will include increasing native riparian planting along the Waikaka Stream to provide an opportunity to enhance indigenous biodiversity and cultural values. The Applicant also proposes monitoring to confirm successful restoration and rehabilitation.
Policy 14	<i>Increased indigenous vegetation cover is promoted in both urban and non-urban environments.</i>	There is limited indigenous vegetation within the project area, and this is confined to the Waikaka Stream and margins. Where operationally feasible, the Applicant plans to relocate existing riparian plants to support rehabilitation of the Waikaka Stream and Shepherds Creek. New indigenous vegetation (and some non-natives) will be used in the riparian margin area of rehabilitated sections of the Waikaka Stream and Shepherds Creek. Once rehabilitation is complete, there is expected to be a net increase in indigenous vegetation within the project area.
Policy 15	<i>Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.</i>	There are waterbirds using the ponds within the project area, though it is unknown if any of these are specified highly mobile fauna. These are expected to temporarily relocate to other ponds in the locality and will likely return on completion of the work.

Table 4 Southland Regional Policy Statement 2017

Objective / Policy Reference	Explanation	Comment
Chapter 3 – Tangata Whenua		
Objective TW.1	Decision making and partnerships with tangata whenua <i>The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are taken into account in a systematic way through effective partnerships between tangata whenua and local authorities, which provide the capacity for tangata whenua to be fully involved in council decision-making processes.</i>	The Applicant is seeking cultural input directly from tangata whenua. The requested public notification will enable full involvement of tangata whenua in the consent process.
Objective TW.2	Provision for iwi management plans <i>All local authority resource management processes and decisions take into account iwi management plans.</i>	An assessment of the proposal against the iwi management plan is included in section 6.2.10 of the AEE.
Objective TW.3	Tangata whenua spiritual values and customary resources <i>Mauri and wairua are sustained or improved where degraded, and mahinga kai and customary resources are healthy, abundant and accessible to tangata whenua.</i>	The proposal is expected to improve the mauri of the watercourses over the long-term following rehabilitation of each of the temporary diversion channels. There are no known mahinga kai resources within the affected watercourses, though confirmation will be sought from tangata whenua.
Objective TW.4	Sites of cultural significance <i>Wāhi tapu, wāhi taonga and sites of significance are appropriately managed and protected.</i>	There are no known sites of cultural significance within the project area.
Policy TW.1	Treaty of Waitangi <i>Consult with, and enhance tangata whenua involvement in local authority resource management decision-making processes, in a manner that is consistent with the principles of the Treaty of Waitangi/Te Tiriti o Waitangi.</i>	The Applicant has sought cultural advice from tangata whenua and engaged in pre-application consultation. Conversations with tangata whenua will be ongoing.
Chapter 4 –Part A - Water Quality		
Objective WQUAL.1	Water quality goals <i>Water quality in the region:</i> a) <i>safeguards the life-supporting capacity of water and related ecosystems;</i> b) <i>safeguards the health of people and communities;</i> c) <i>is maintained, or improved in accordance with freshwater objectives formulated under the National Policy Statement for Freshwater Management 2014;</i>	The proposal affects water quality in the Waikaka Stream and Shepherd's Creek and will result in: • Temporary adverse effects of sediment on water quality from the diversion activities, which are expected to be minimised by the construction methodology and result in no decrease in water quality outside the mixing zone

Objective / Policy Reference	Explanation	Comment
	d) <i>is managed to meet the reasonably foreseeable social, economic and cultural needs of future generations.</i>	No anticipated decrease in water quality outside the mixing zone for the ongoing dewatering water, processing water and stormwater discharge. The proposal is considered to safeguard the life-supporting capacity of water and related ecosystems in accordance with the nature and scale of effects as limited by the proposed mitigation measures (clause (a)). The proposed activities are expected to comply with the water quality standards and good practise measures will be utilised to limit the effects of the discharges. The proposal will not affect drinking water supplies and so is considered to achieve clause (b) of the Objective. Freshwater objectives have been assessed in Table 1 above, and for the reasons therein, the proposal is considered to be consistent with clause (c). The proposal is not considered to detract from the needs of future generations given the temporary duration of the activity and its effects, and the mitigation proposed (clause (d)). Overall, the proposal is considered to achieve this Objective.
Objective WQUAL.2	Lowland water bodies <i>Halt the decline, and improve water quality in lowland water bodies and coastal lakes, lagoons, tidal estuaries, salt marshes and coastal wetlands in accordance with freshwater objectives formulated in accordance with the National Policy Statement for Freshwater Management 2014.</i>	The Waikaka Stream and Shepherd's Creek could be considered to be lowland water bodies. The proposal will result in no expected decrease in water quality beyond the mixing zone for operational discharges (dewatering water, processing water, and stormwater), and the rehabilitation of the stream may contribute to longer term improvements to water quality in the streams. Overall, the proposal is considered to achieve this Objective.
Policy WQUAL.1	Overall management of water quality a) <i>Identify values of surface water, groundwater, and water in coastal lakes, lagoons, tidal estuaries, salt marshes and coastal wetlands, and formulate freshwater objectives in accordance with the National Policy Statement for Freshwater Management 2014; and</i>	The land use and discharge activities will be undertaken in a manner to ensure that freshwater objectives are met. No long-term degradation of water quality is expected, and any adverse effects are expected to be either temporary and/or mitigated, and overall compliant with water quality standards.

Objective / Policy Reference	Explanation	Comment
	<i>b) Manage discharges and land use activities to maintain or improve water quality to ensure freshwater objectives in freshwater management units are met.</i>	
Policy WQUAL.2	All waterbodies <i>Maintain or improve water quality, having particular regard to the following contaminants:</i> <i>a) nitrogen;</i> <i>b) phosphorus;</i> <i>c) sediment;</i> <i>d) microbiological contaminants.</i>	Sediment may be discharged to receiving water bodies by the construction work to divert the Waikaka Stream and Shepherd's Creek, the diversion of the flow, and the discharge of water from the settling ponds (processing wastewater, stormwater and dewatering water). The mitigation measures and monitoring proposed in section 5 of the AEE will ensure that sediment discharges are of an acceptable quality. Monitoring is proposed to confirm the effectiveness of the mitigation measures. Microbiological contaminants, nitrogen and phosphorus are not expected to be of concern given the nature of the proposal. Any other contaminants have been addressed in the AEE and it is considered that the outcome of at least maintain water quality is achieved after reasonable mixing.
Policy WQUAL.7	Social, economic and cultural benefits <i>Recognise the social, economic and cultural benefits that may be derived from the use, development or protection of water resources.</i>	The social and economic benefits of the proposal are identified in section 5 of the AEE, and it is appropriate to recognise the provision of local and regional benefits arising from the proposal. Input is being sought from Hokonui Runanga in respect of potential cultural benefits.
Policy WQUAL.8	Preference for discharge to land <i>Prefer discharges of contaminants to land over discharges of contaminants to water, where:</i> <i>a) a discharge to land is practicable;</i> <i>b) (b) the adverse effects associated with a discharge to land are less than a discharge to water.</i>	The proposal involves discharge to water, instead of discharge to land. Discharges to land are considered unfeasible in respect of the project, due to the scale of water requiring discharge, and the operational requirement to dewater land.
Policy WQUAL.9	Untreated human and animal wastes <i>Avoid the direct discharge of sewage, wastewater, industrial and trade waste and agricultural effluent to water unless these discharges have undergone treatment.</i>	Processing wastewater from the GRP is technically an industrial or trade waste, which is relevant to this policy. The primary contaminant is sediment, which will be treated to an appropriate standard as outlined in the AEE section 5. The proposal does not include the discharge of untreated human or animal wastes.

Objective / Policy Reference	Explanation	Comment
Policy WQUAL.10	Siting and operation <i>Manage the siting and operation of activities that result in point source discharges of contaminants to land to ensure that adverse effects on groundwater, surface water and coastal water quality are avoided, remedied or mitigated.</i>	There are no point source discharges to land proposed and so this policy is not relevant.
Policy WQUAL.11	Sources of community water supplies <i>Avoid, as far as practicable, remedy or mitigate the risks that the adverse effects of land use activities and discharges of contaminants have on the sources of community water supplies.</i>	The proposal will not impact on any community water supplies.
Policy WQUAL.12	Integrated Management <i>Integrate the management of land use, water quality, water quantity, coast and air, and the use, development and protection of resources wherever possible to achieve the freshwater objectives formulated in accordance with Policy WQUAL.1.</i>	It is considered that the proposal presents an appropriately integrated approach to the management of resources in order to achieve the freshwater objectives.
Chapter 4 – Part B- Water Quantity		
Objective WQUAN.1	Sustainably managing the region's water resources <i>Flows, levels and allocation regimes of surface water and groundwater in the region are developed in accordance with the National Policy for Freshwater Management 2014 to:</i> <i>a) safeguard the life-supporting capacity of water, catchments and related ecosystems;</i> <i>b) support the maintenance or improvement of water quality in accordance with Policy WQUAL.1;</i> <i>c) meet the needs of a range of uses, including the reasonably foreseeable social, economic and cultural needs of future generations;</i> <i>d) comply with limits or targets set to achieve freshwater objectives.</i>	The proposal will not adversely impact on flow, level or allocation regimes. Surface water body flows will increase or not be affected. Local groundwater levels will be reduced, but within appropriate limits as discussed in the AEE section 5.
Objective WQUAN.2	The effective allocation and use of water <i>The allocation and use of Southland's water resources:</i> <i>a) is efficient;</i> <i>b) recognises and makes provision for the Monowai and nationally significant Manapōuri hydroelectric generation schemes in the Waiau catchment and the resultant modified flows and levels.</i>	The allocation and use of water has been assessed in the AEE section 5 and is considered to be efficient. Water abstracted will be extensively recycled so that dewatering is minimised to the extent necessary to maintain a dry working area.

Objective / Policy Reference	Explanation	Comment
Policy WQUAN.1	Instream values <i>Maintain instream values of surface water that derive from flows and levels of water, while recognizing the special circumstances of the Waiau catchment.</i>	The proposal will not reduce water flows and levels, except temporarily during the diversion of flow from the Waikaka Stream and Shepherd's Creek. Instream values will be maintained by relocating fish, maintaining continuity of flow and establishing a similar or improved quality of habitat in the new diversion channel.
Policy WQUAN.2	Overallocation <i>Avoid over-allocation of surface water and groundwater, and resolve any historical instances of overallocation, while recognising the special provisions made for the Waiau catchment.</i>	The proposal does not result in any overallocation of surface or groundwater.
Policy WQUAN.6	Efficient use of water a) <i>Ensure that any water taken from surface water or ground water is used efficiently.</i> b) <i>Where freshwater bodies are approaching full allocation, consider establishing management provisions to maximise the efficiency of using any available water.</i>	Extensive recycling of the dewatering water and processing wastewater will ensure that all water abstracted is used efficiently.
Policy WQUAN.7	Social, economic and cultural benefits <i>Recognise the social, economic and cultural benefits that may be derived from the use, development or protection of water resources.</i>	The social and economic benefits of the proposal are identified in section 5 of the AEE, and it is appropriate to recognise the provision of local and regional benefits arising from the proposal. Input is being sought from Hokonui Runanga in respect of cultural benefits.
Policy WQUAN.8	Integrated management <i>Integrate the management of land use, water quality, water quantity and use and development of resources wherever possible.</i>	It is considered that the proposal presents an appropriately integrated approach to the management of resources.
Chapter 4 – Part C – Beds of lakes and rivers		
Objective BRL.1	Lake and river bed values <i>All significant values of lakes and rivers are maintained and enhanced.</i>	There are no identified significant lake or river bed values within the project site area, however the proposal has been developed with mitigation measures intended to minimise the short term adverse effects on river bed values and ensure that long term outcomes for river bed values are positive.
Objective BRL.2	Public access <i>Public access to, along and across lakes and rivers is maintained, and enhanced where necessary, in a strategic and co-ordinated manner, to ensure a level of public access appropriate to the values of the area.</i>	Public access will be restricted for a temporary duration and to a localised area of the Waikaka Stream and Shepherd's Creek. Alternative public access options, particularly for recreational anglers, are available.

Objective / Policy Reference	Explanation	Comment
		Overall, public access will continue to be appropriate to the values of the area.
Policy BRL.4	Public access <i>Public access to, along and across lakes and rivers will be maintained and enhanced by:</i> a) <i>identifying, through regional and district plans, surface water bodies or locations that are priorities for access;</i> b) <i>providing direction about where and when additional access should be established;</i> c) <i>ensuring structures and bed disturbance activities in the beds of lakes and rivers do not impeded public access, unless it is necessary to do so for safety reasons; and</i> d) <i>consulting with territorial authorities, tangata whenua, stakeholders and local land owners to develop non-regulatory methods to encourage retention or establishment of public access.</i>	The project site area is not identified as a location that is a priority for access. Restriction to public access forms part of the proposal and is necessary for public safety. Restrictions to public access to the Waikaka Stream bed will be temporary, as outlined in the AEE section 5.12.
Policy BRL.5	Social, economic and cultural benefits <i>Recognise the social, economic and cultural benefits that may be derived from the use, development or protection of river and lake beds.</i>	The social and economic benefits of the proposal are identified in section 5 of the AEE, and it is appropriate to recognise these.
Chapter 5 – Rural Land/ Soils		
Objective RURAL.1	Sustainable use of rural land resource <i>Achieve sustainable use of Southland's rural land resource, in respect of:</i> a) <i>agriculture and primary sector activities;</i> b) <i>subdivision, use and development activities;</i> c) <i>earthworks and vegetation clearance activities;</i> d) <i>the use of soil resources;</i> e) <i>mineral extraction activities; and</i> f) <i>on-site wastewater systems.</i>	The proposed activity enables sustainable use of the rural land resource by management of soil to protect its quality, return of land to agricultural purposes and productivity post-mining and continuous rehabilitation approach.
Objective RURAL.2	Life supporting capacity of soils <i>Safeguard the life-supporting capacity, mauri and health of soils in rural areas, and prevent or minimise soil erosion and sedimentation from land use soil disturbance.</i>	Management techniques proposed in the application, in addition to pre- and post- condition soil quality monitoring, will ensure that the life-supporting capacity, mauri and health of soils is retained.

Objective / Policy Reference	Explanation	Comment
Policy RURAL.1	Social, economic and cultural wellbeing <i>Recognise that use and development of Southland's rural land resource enables people and communities to provide for their social, economic and cultural wellbeing.</i>	This policy enables recognition that mineral extraction activities can contribute to the wellbeing of people and communities. This proposal will contribute socially and economically to local people and communities as outlined in section 5.20 of the AEE.
Policy RURAL.2	Land use change and land development activities <i>Manage subdivision, land use change and land development activities in rural areas of Southland, in a way that maintains or enhances rural amenity values and character.</i>	The proposed activity can be managed in a manner to avoid detracting from the rural amenity values for immediate neighbours, by controlling noise and dust in the manner described in section 5 of the AEE. Visual amenity values will be temporarily reduced, however noting that the policy explanation records that rural production activities are an essential component of rural environments, visual amenity effects are not considered to be wholly unanticipated in the receiving environment. The land will be progressively returned to pasture, resulting in no long-term adverse effects on visual amenity values.
Policy RURAL.4	Loss of high value soils from productive use <i>Avoid the irreversible loss of high value soils from productive use, through inappropriate subdivision, use and development.</i>	This proposal avoids irreversible loss of highly productive soils, through dedicated topsoil management preservation as outlined in section 5.18 of the AEE. The proposal results in no permanent loss of productive agricultural land on the basis of continuous rehabilitation back to pasture post-mining.
Policy RURAL.5	Effects of rural land development <i>The effects of rural land development shall be sustainably managed and land management practices encouraged so that:</i> a) <i>soil properties are safeguarded;</i> b) <i>soil erosion is minimised;</i> c) <i>soil compaction and nutrient sediment loss is minimised;</i> d) <i>soil disturbance is reduced;</i> e) <i>water quality is maintained or enhanced;</i> f) <i>indigenous biodiversity is maintained or enhanced;</i> g) <i>the mauri of water and soils is safeguarded.</i>	Specific management measures as outlined in section 5 of the AEE will ensure topsoil quality is retained to ensure the return of the land to agricultural production post mining. Erosion will be controlled by progressive rehabilitation and grassing of long-term stockpiles. Water quality will be protected by preventing erosion of sediment to water. No net loss of indigenous biodiversity is anticipated, though there may be a temporary reduction during the construction of each temporary diversion. Overall, the application proposes a number of measures to safeguard the mauri of water and soils.
Chapter 6 – Biodiversity		
Objective BIO.2	Maintain and protect <i>Maintain indigenous biodiversity in Southland and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna for present and future generations.</i>	Over the rehabilitation period, the proposal will contribute to indigenous biodiversity within the area of works. There are no identified areas of significant indigenous vegetation and significant habitats of indigenous fauna present on the application site.

Objective / Policy Reference	Explanation	Comment
Objective BIO.3	Enhance <i>Enhance the range, extent and condition of indigenous biodiversity in Southland, with a particular emphasis on those areas most at risk to further loss or degradation.</i>	The proposal is anticipated to enhance the extent and condition of indigenous vegetation, over the rehabilitation period, within the rehabilitated Waikaka.
Policy BIO.4	Maintain indigenous biodiversity <i>Manage a full range of indigenous habitats and ecosystems to achieve a healthy functioning state, and to ensure viable and diverse populations of native species are maintained, while making appropriate provisions for lawful maintenance and operation of existing activities.</i> <i>In giving effect to this policy, regard will be had to the following potential adverse effects:</i> <i>(i) fragmentation of, or reduction in the extent of, indigenous vegetation or habitats of indigenous fauna;</i> <i>(ii) fragmentation or disruption of connections and linkages between ecosystems or habitats of indigenous fauna;</i> <i>(iii) loss of, or damage to, buffering of ecosystems or habitats of indigenous fauna;</i> <i>(iv) loss or reduction of rare or threatened indigenous species' populations or habitats.</i>	The proposal will maintain ecological connections and corridors along the Waikaka River, by ensuring that the diversion channels are established and stabilised prior to diverting flow. Additional planting of native species along the rehabilitated sections of the streams will ensure there is no overall net loss to indigenous flora, except temporarily during the construction phase. There are no known rare or threatened indigenous species impacted by the proposal.
Policy BIO.8	Tangata whenua <i>Recognise the role of tangata whenua as kaitiaki, by providing for:</i> <i>a) tangata whenua values and interests to be incorporated into the management of indigenous biodiversity;</i> <i>b) consultation with tangata whenua regarding the means of maintaining and restoring or enhancing habitats identified in accordance with Policy BIO.1 that have particular significance to tangata whenua;</i> <i>c) active involvement of tangata whenua in the protection of cultural values associated with indigenous biodiversity;</i> <i>d) customary use of indigenous biodiversity according to tikanga.</i>	The Applicant has sought cultural advice from tangata whenua and engaged in pre-application consultation.
Policy BIO.9	Biodiversity offsets and environmental compensation <i>In addressing significant residual adverse effects (i.e. those effects left after all the appropriate avoidance, remediation, or mitigation actions have been taken), local authorities will consider the use of any</i>	The proposal will not have any significant residual adverse effects on completion of the rehabilitation of the diverted sections of the Waikaka Stream and Shepherd's Creek. The Applicant's philosophy is to ensure the rehabilitated areas, after an establishment period, provides at least

Objective / Policy Reference	Explanation	Comment
	<i>biodiversity offset and/or environmental compensation measures offered by an applicant.</i>	the same, if not better habitat and biodiversity values compared to the existing sections of the Waikaka Stream and Shepherd's Creek that are affected by the proposal.
Chapter 8 – Natural Hazards		
Objective NH.1	Communities becoming more resilient <i>The risks to people, communities, their businesses, property and infrastructure from the effects of natural hazards are understood and avoided, remedied or mitigated, resulting in communities becoming more resilient.</i>	Natural hazard risks associated with flooding have been assessed and avoided by designing the new diversion channel with similar flood carrying capacity to that existing. The proposal will not exacerbate any natural hazard risk.
Policy NH.2	Identify and manage risks from natural hazards <i>Identify in district plans, where practicable, areas subject to known natural hazard risk, and actively engage with individuals and the community in managing those and other natural hazard risk areas, using the most up to date information available.</i>	The site falls within an area of known flood risk. The diversion channels have been designed with consistent capacity for a 1 in 20-year event, equivalent to the capacity along most of the existing channel.
Policy NH.3	Precautionary approach <i>Take a precautionary approach towards managing the effects of climate change and sea level rise, and any associated changes in the scale and frequency of natural hazards, to ensure potential adverse effects are avoided or mitigated.</i>	Due to the short-term nature of this proposal, the current scale and frequency of natural hazards has been utilised for the assessment, rather than long term climate change predictions. The proposal will not exacerbate any existing natural hazards.
Policy NH.4	Management priorities <i>In managing natural hazards, the following implementation priorities are to be adopted:</i> <i>1. avoid exposure to areas at significant risk from natural hazards where practicable by adopting a precautionary approach;</i> <i>2. mitigate the effects of natural hazards by managing land use in areas known to be susceptible to the effects of natural hazards;</i> <i>3. undertake physical works needed to reduce the potential for the natural hazard to affect people and infrastructure.</i>	The proposal does not increase any risk of natural hazards. The new Waikaka diversion channel will be constructed prior to the removal of the Waikaka Stream, thus ensuring that the flood carrying capacity remains at least the same as existing.
Policy NH.5	Avoid areas of significant risk from natural hazards <i>Avoid...development and placement of critical infrastructure in areas at significant risk from natural hazards, unless:</i> <i>a) there is no reasonable alternative, in which case critical infrastructure must be designed to maintain, as far as practicable, its integrity and function during natural hazard events; or</i>	Avoidance of the flood risk area is not possible given the activity must locate where the mineral resource is. However, the project design ensures that the project will not increase the natural hazard risk to other parties nor cause any increase in the effects of flooding.

Objective / Policy Reference	Explanation	Comment
	b) <i>avoidance is impossible or impractical and adverse effects are mitigated to an acceptable level; or</i> c) <i>subdivision is solely for the purpose of boundary adjustments.</i>	
Chapter 11 – Contaminated Land		
Objective CONTAM.1	Identify, investigate and manage contaminated land <i>Land affected by soil contamination is identified, investigated and managed.</i>	Potentially contaminated land has been investigated by the completion of the Geosciences PSI, enabling the appropriate management of potentially contaminated soils.
Objective CONTAM.2	Avoid, remedy or mitigate adverse effects <i>Adverse effects on the environment (including human health) from contaminated land are avoided, remedied or mitigated.</i>	Adverse effects from the disturbance of the identified landfill area will be avoided by specifying an appropriate set back of the works from this area. There are no other areas of contaminated land identified in the area of works.
Policy CONTAM.2	Management of contaminated land a) <i>Protect human health when undertaking activities on land that is potentially, or known to be, contaminated.</i> b) <i>Manage contaminated land to avoid, remedy or mitigate adverse effects on the environment.</i>	Human health will not be at risk from contaminated land due to the avoidance of the landfill area, and confirmation by the Geosciences PSI that there are no other known or likely areas of contamination.
Chapter 12 – Hazardous Substances		
Objective HAZ.1	Protection of the environment (including human health and safety) <i>Adverse effects on the environment (including human health and safety) from the storage, use, transportation and disposal of hazardous substances are prevented or mitigated.</i>	The proposal incorporates appropriate storage, use and contingency measures for the management of hazardous substances on the site, including a bunded storage area for fuel with secondary containment and spill mitigation measures.
Policy HAZ.1	Hazardous substance storage facilities and containers <i>Ensure facilities and containers used to store hazardous substances are located, designed, constructed and managed to avoid, remedy or mitigate adverse effects, including unacceptable risks, to the environment (including human health and safety).</i>	The fuel storage facility is located at sufficient distance from local waterbodies and will be constructed in accordance with industry standards.
Policy HAZ.2	Accidents involving hazardous substances <i>Provide appropriate facilities and systems to avoid, remedy or mitigate the contamination of soil, water, and air in the event of accidents involving hazardous substances.</i>	Spill mitigation measures will ensure the protection of groundwater in the event of accidental spillage of fuel while refueling. A secondary containment area will provide protection from leaks from the fuel storage facility.

Objective / Policy Reference	Explanation	Comment
Chapter 13 – Solid Waste¹		
Objective WASTE.2	Avoid, mitigate, or where appropriate remedy adverse effects <i>Avoid, mitigate, or where appropriate remedy the adverse environmental effects of solid waste storage, disposal, processing, handling and transportation.</i>	While the definition of solid waste includes mine tailings, it is noted that only water is added to the overburden and therefore it is only natural material being returned to the mine pit as 'solid waste'. Potential for the tailings to become acid forming has been addressed in detail in the MWM report (Attachment [P]) and section 5 of the AEE, noting that the risk of acid mine drainage is very low. Replacement of the tailings into the mine pit, covering with backfilled overburden and following groundwater rebound, mitigates the risk to effectively nil.
Chapter 14 – Historic Heritage		
Objective HH.1	Protection of historic heritage <i>Historic heritage values are identified and protected from inappropriate subdivision, use and development.</i>	Potential archaeological and heritage values on the site have been investigated by Southern Archaeology (Attachment [R]) and an archaeological authority has been obtained in regard to the disturbance of potential archaeology at the former 'Mains House' site. There are no heritage values that will be affected by the project.

¹ Includes mine and quarrying tailings

Table 5 Southland Regional Water Plan

Objective / Policy Reference	Explanation	Comment
Chapter 5.1.1 Water Objectives		
Objective 2	Maintain water quality <i>To manage water quality so that there is no reduction in the quality of the water in any surface water body, beyond the zone of reasonable mixing for discharges, below that of the date this Plan became operative (January 2010).</i>	The proposal will not result in any overall long-term deterioration in water quality in the Waikaka Stream outside the reasonable mixing zone. Mitigation measures proposed in the AEE will ensure this outcome is met, by appropriately treating discharges to remove sediment, and undertaking the diversion of the Waikaka Stream with good erosion and sediment control practices.
Objective 3	Surface water bodies other than in Natural State Waters <i>To maintain and enhance the quality of surface water bodies so that the following values are protected where water quality is already suitable for them, and where water quality is currently not suitable, measurable progress is achieved towards making it suitable for them.</i> <i>In surface water bodies classified as ... lowland (hard bed), lowland (soft bed) ...:</i> <i>(a) bathing, in those sites where bathing is popular;</i> <i>(b) trout where present, otherwise native fish;</i> <i>(c) stock drinking water;</i> <i>(d) Ngāi Tahu cultural values, including mahinga kai;</i> <i>(e) natural character including aesthetics.</i>	The proposal will not result in any deterioration in water quality in the Waikaka Stream outside the reasonable mixing zone, and hence vales to be protected by the Objective will be maintained.
Objective 4	Gradual improvement in surface water quality parameters <i>To manage the discharge of contaminants and encourage best environmental practice to improve the water quality in surface water bodies classified as hill, lowland (hard bed), lowland (soft bed) and spring fed, and in particular to achieve a minimum of 10 percent improvement in levels of the following water quality parameters over 10 years from the date this Plan became operative (January 2010):</i> <i>(a) microbiological contaminants</i> <i>(b) nitrate</i> <i>(c) phosphorus</i> <i>(d) clarity</i>	The proposed discharges will be appropriately mitigated so as to not cause any deterioration in the water quality parameters specified in the Objective 4, outside the reasonable mixing zone.

Objective / Policy Reference	Explanation	Comment
Objective 5	Sufficient water availability <i>To have sufficient water to support the reasonably foreseeable needs of current and future generations and enable people and communities to provide for their social, economic and cultural wellbeing while protecting aquatic ecosystem health, life supporting capacity, natural character and historic heritage values of surface water bodies.</i>	The proposal will not reduce the amount of water available downstream within the Waikaka Stream.
Chapter 5.1.2 Groundwater Objectives		
Objective 8	Drinking Water Standard <i>(a) To maintain groundwater quality in aquifers that already meet the Drinking-Water Standards for New Zealand 2000; ...</i>	The proposal will not adversely affect groundwater quality compliance with the drinking water standard. Controls proposed around the management of potential contaminant pathways, and positive pressure of groundwater into the mine pit, appropriately mitigate the risk of groundwater contamination.
Objective 9	Sustainable abstraction <i>To ensure that the total volume and rate of groundwater abstraction is sustainable.</i>	The volume of groundwater to be abstracted by dewatering has been assessed as being approximately 43% of the predicted aquifer recharge, in combination with other existing takes. The volume of groundwater to be abstracted is therefore considered to be sustainable.
Chapter 5.1.3 Land and Soil Objectives		
Objective 9A	Maintain soil quality <i>To manage discharges onto or into land so that the quality and structure of soil resources are maintained.</i>	The project does not encompass any discharge that may adversely affect soil quality, soil structure, human health, habitats, ecosystems, amenity or historic heritage values.
Objective 9B	Human health <i>To manage discharges onto or into land so that adverse effects on human health are avoided.</i>	
Objective 9C	Habitats and ecosystems and other values <i>To manage discharges onto or into land so that any adverse effects on:</i> <i>(a) the diversity and integrity of habitats and ecosystems; and</i> <i>(b) amenity and historic heritage values are avoided, remedied or mitigated to ensure that these values are maintained or enhanced.</i>	

Objective / Policy Reference	Explanation	Comment
Chapter 5.1.4 River Bed (including beds of streams and modified watercourses) and Lake Bed Use and Development Objectives		
Objective 10	Habitats and ecosystems <i>To maintain or enhance the diversity and integrity of aquatic and riverine habitats and ecosystems.</i>	The Dungey report (Attachment [L]) provides a study of existing habitats and ecosystem diversity in the Waikaka Stream, and specifications to ensure that the habitat and ecosystem diversity is replicated and improved in the Waikaka Diversion channel. The Applicant aims to achieve an enhancement of habitat and ecosystem values by increasing the proportion of native riparian planting and cobble substrate in the new diversion channel. Habitat and ecosystem integrity will be maintained by ensuring the smooth transfer of flow to the new diversion channel and prompt planting of the rehabilitated channel.
Objective 12	Public access <i>To maintain and enhance public access to river beds (including beds of streams and modified watercourses) and lake beds except in circumstances where public health and safety are at risk.</i>	The proposal does restrict public access to parts of the Waikaka Stream and Shepherd's Creek channel for a temporary period, however, this is to prevent public access to an area of work where their health and safety could be at risk. Public access to the parts of the Waikaka Stream and Shepherd's Creek not affected by the proposed work will remain available.
Objective 13	Natural character and outstanding natural features <i>To protect natural character and outstanding natural features of rivers and lakes from inappropriate use and development.</i>	There are no outstanding natural features affected by this project, however the natural character of the Waikaka Stream will be adversely affected by the diversion, albeit temporarily, and with rehabilitation and restoration to be undertaken as proposed in the AEE. Considering the temporary nature of the effect and the rehabilitation and restoration proposed, the project will not inappropriately impact the natural character of the Waikaka Stream.
Objective 14	Fish passage (Clause 3.26 of National Policy Statement for Freshwater Management 2020) <i>The passage of fish is maintained, or is improved, by instream structures, except where it is desirable to prevent the passage of some fish species in order to protect desired fish species, their life stages, or their habitats.</i>	Fish passage is addressed in detail in section 5.8.4 of the AEE, noting that fish passage in the Waikaka Stream and/or the new diversion channel will be maintained. However, fish passage may be temporarily obstructed from the L&M pond and farm drains while work is being undertaken, though any stranded fish will be salvaged by an appropriately qualified person.

Objective / Policy Reference	Explanation	Comment
Chapter 5.2.1 Water Policies		
Policy 1A	Take into account Iwi Management Plans <i>Any assessment of an activity covered by this plan must take into account any relevant Iwi Management Plan.</i>	An assessment is provided against the Iwi Management Plan.
Policy A4 of the NPSFW 2014	1. When considering any application for a discharge the consent authority must have regard to the following matters: a. the extent to which the discharge would avoid contamination that will have an adverse effect on the life-supporting capacity of fresh water including on any ecosystem associated with fresh water and b. the extent to which it is feasible and dependable that any more than minor adverse effect on fresh water, and on any ecosystem associated with fresh water, resulting from the discharge would be avoided. 2. When considering any application for a discharge the consent authority must have regard to the following matters: a. the extent to which the discharge would avoid contamination that will have an adverse effect on the health of people and communities as affected by their secondary contact with fresh water; and b. the extent to which it is feasible and dependable that any more than minor adverse effect on the health of people and communities as affected by their secondary contact with fresh water resulting from the discharge would be avoided. 3. This policy applies to the following discharges (including a diffuse discharge by any person or animal): a. a new discharge or b. a change or increase in any discharge – of any contaminant into fresh water, or onto or into land in circumstances that may result in that contaminant (or, as a result of any natural process from the discharge of that contaminant, any other contaminant) entering fresh water.	None of the discharges proposed are expected to have a significant effect on the life supporting capacity of fresh water and have been designed with mitigation measures to avoid as far as practicable, adverse effects on ecosystems and fresh water. The discharges will not adversely affect the health of people and communities as a result of secondary contact with the discharge.
Policy 1	Surface water body classes <i>(a) Recognise the different characteristics of the following surface water body classes when managing discharges:</i> <i>(ii) Lowland (hard bed)</i>	The appropriate water quality standards have been referred to in the assessment of the effects of the discharge on water quality, and mitigation proposed to ensure that the standards are met, as far as practicable.

Objective / Policy Reference	Explanation	Comment
	(iii) Lowland (soft bed) (b) Apply water quality standards established under any Water Conservation Order.	There are no Water Conservation Orders relevant to the proposal.
Policy 3	No reduction in water quality <i>Notwithstanding any other policy or objective in this plan, allow no discharges to surface water bodies that will result in a reduction of water quality beyond the zone of reasonable mixing, unless it is consistent with the promotion of the sustainable management of natural and physical resources, as set out in Part 2 of the Resource Management Act 1991, to do so.</i>	The proposal has been designed with robust sediment control measures to minimise any effects on the water quality in the Waikaka Stream, with these measures expected to ensure that water quality is maintained outside the reasonable mixing zone.
Policy 4	Surface water bodies outside Natural State Waters <i>For surface water bodies outside Natural State Waters, manage point source and non-point source discharges to meet or exceed the water quality standards referred to in Rule 1 and specified in Appendix G “Water Quality Standards”, unless it is consistent with the promotion of the sustainable management of natural and physical resources, as set out in Part 2 of the Resource Management Act 1991, to do so and so avoid levels of contaminants in water and sediments that could harm the health of humans, domestic animals including stock and/or aquatic life.</i>	Comments on Policy 3 are applicable in respect of this policy as well. Further, none of the discharges are expected to create any harm to the health of humans, domestic animals, stock and/or aquatic life.
Policy 5	Discharges to water in artificial watercourses <i>Manage discharges to water in artificial watercourses so that any new discharge, in conjunction with existing discharges, does not reduce the water quality of the surface water body into which the artificial watercourse flows below any standards set for the surface water body in Appendix G “Water Quality Standards” following a zone of reasonable mixing from the point of confluence of the artificial watercourse with the surface water body.</i>	The discharge of gold processing return water, stormwater and dewatering water will be into artificial watercourses and then to the Waikaka Stream. This discharge is expected to meet the water quality standards beyond the reasonable mixing zone.
Policy 7	Prefer discharges to land <i>Prefer discharges to land over discharges to water where this is practicable and the effects are less adverse.</i>	Discharge from the settling ponds to land is not practicable, as the water would enter the mine pit, frustrating the purpose of the dewatering. Discharge of the Waikaka Diversion water to land is not desirable, as it is a better environmental outcome to maintain continuity of the flow in the river. Regardless, the adverse effects of

Objective / Policy Reference	Explanation	Comment
		discharging to water are proposed to be appropriately managed and the effects of discharging to land would not be less adverse.
Policy 8	Discharges to water <i>Prefer point source discharges of contaminants to water at times of high flow over discharges at normal or low flows, and ensure that where discharging does take place at low flows, the effects that could not be practically avoided are minimised.</i>	The rate of discharge to the Waikaka Stream from the dewatering, process and stormwater will be continuous, however appropriate treatment will ensure that adverse effects will be no more than minor regardless.
Policy 9	Zone of reasonable mixing <i>When determining the size of the zone of reasonable mixing, minimise the size of the area where the relevant water quality standards are breached. Consideration should be given to, but not be limited to, the following matters: (a) the aquatic ecosystem values in the affected reach; (b) the need for fish passage; (c) the uses of the water body adjacent to and downstream of the point of discharge.</i>	The reasonable mixing zone in the Waikaka Stream has been determined to be 60m (Heller Report, Attachment [K], p.35). The aquatic ecosystem values in the affected reach are as described in the Dungey report (Attachment [L]) and the effects on these values are addressed in the AEE section 5.8.1. Fish passage will not be affected per previous comments. The uses of the water body adjacent to and downstream of the point of discharge are rural farming land uses, and the nearest downstream fishing access point is 6.8km downstream of the point of discharge.
Policy 11	Stormwater discharges <i>Apply consent conditions requiring consented discharges of stormwater to meet both the ANZECC sediment guidelines (as shown in Appendix E of this Plan) and the relevant water quality standards specified in Appendix G "Water Quality Standards" following reasonable mixing to: (a) all resource consents for new stormwater discharges; ...</i>	The stormwater discharge is expected to meet the relevant guidelines and standards. The Applicant is open to conditions of consent to this effect.
Policy B7 of the NPSFW 2014	<i>1. When considering any application the consent authority must have regard to the following matters: (a) the extent to which the change would adversely affect safeguarding the life-supporting capacity of fresh water and of any associated ecosystem; and (b) the extent to which it is feasible and dependable that any adverse effect on the life-supporting capacity of fresh water and of any associated ecosystem resulting from the change would be avoided. 2. This policy applies to: (a) any new activity; and</i>	The proposal is not likely to result in a more than minor 'adverse change in the natural variability of flows or level of any fresh water' and therefore this policy is not considered relevant to the proposal.

Objective / Policy Reference	Explanation	Comment
	<i>(b) any change in the character, intensity or scale of any established activity – that involves any taking, using, damming or diverting of fresh water or draining of any wetland which is likely to result in any more than minor adverse change in the natural variability of flows or level of any fresh water, compared to that which immediately preceded the commencement of the new activity or the change in the established activity (or in the case of a change in an intermittent or seasonal activity, compared to that on the last occasion on which the activity was carried out).</i>	
Policy 14	Manage the taking, use, damming or diversion of surface water <i>While recognising the positive effects resulting from the use and development of water resources, manage the taking, use, damming or diversion of surface water so as to avoid where practicable, remedy or mitigate significant adverse effects on:</i> <i>(a) the quality and quantity of aquatic habitat;</i> <i>(b) natural character, natural features, and amenity, aesthetic and landscape values;</i> <i>(c) areas of significant indigenous vegetation and significant habitats of indigenous fauna;</i> <i>(d) recreational values;</i> <i>(e) the spiritual and cultural values and beliefs of the tangata whenua;</i> <i>(f) water quality, including temperature;</i> <i>(g) the rights of lawful existing users;</i> <i>(h) groundwater quality and quantity;</i> <i>(i) historic heritage.</i>	This policy applies to the damming and diversion of the Waikaka Stream. The positive effects of the proposal are outlined in section 5.23 of the AEE. The proposal may result in significant temporary effects on the quality and quantity of aquatic habitat, though the policy enables this to be remedied or mitigated, which WGML propose to do by rehabilitating the diverted sections of the river channel to a standard where the aquatic habitat quality will be at least as good as that affected, and the quantity of riverine aquatic habitat will be maintained. Natural character, amenity and landscape values, vegetation and habitats of indigenous fauna will also be affected, though temporarily and mitigated by the Applicant's rehabilitation strategy, similar to the comments regarding aquatic habitat above. Effects on recreational values will be temporary and not significant, considering the limited stretch of the Waikaka Stream affected, with reference to the assessment in section 5.12 of the AEE. Effects on tangata whenua values will be addressed by specific consultation. Effects on water quality will be temporary, and WGML have proposed a number of mitigation measures to control sediment, as outlined in section 5.7.1 of the AEE. There are no effects on matters in parts (g) – (i) of the policy, as a result of the proposed activity.

Objective / Policy Reference	Explanation	Comment
Policy 14A	Determining the term of a water permit <i>To determine the term of a water permit consideration will be given, but not limited, to:</i> <i>(a) the degree of certainty regarding the nature, scale, duration and frequency of adverse effects from the activity;</i> <i>(b) the level of knowledge of the resource;</i> <i>(c) relevant tangata whenua values</i> <i>(d) the allocation sought, particularly the proportion of the resource sought;</i> <i>(e) the duration sought by the applicant, plus material to support the duration sought;</i> <i>(f) the permanence and economic life of the activity;</i> <i>(g) capital investment in the activity;</i> <i>(h) monitoring and review requirement in permit conditions;</i> <i>(i) the desirability of applying a common expiry date for water permits that allocate water from the same resource; and</i> <i>(j) the applicant's compliance with the conditions of the previous permit (where a new water permit is sought for a previously authorised activity).</i>	The term of water permit sought is 20 years, concurrent with all other consents relating to the proposal. The duration sought is considered appropriate to allow for sufficient time for the mining activity and subsequent rehabilitation to occur, with contingency to account for the complex access arrangements required and economic uncertainties. The technical reports supporting the application give a reasonable degree of confidence in the likely adverse effects arising from the activity and there is a significant amount of capital investment required in the activity. The activity is not permanent, and the duration sought reflects that.
Policy 15	Surface water abstraction, damming, diversion and use <i>(a) Use a staged management approach to allocate surface water for abstraction, damming, diversion and use in Southland to allow the knowledge gained by the progressive development of the region's surface water resources to be built into its future management.</i> <i>(b) Recognise the different characteristics of the following surface water management units when managing surface water quantity: ...</i> <i>(e) Recognise and provide for surface water abstraction, damming, diversion and use resulting in positive effects and no net loss of water in a catchment.</i> <i>(f) Recognise and provide for surface water abstraction, diversion and use permitted under Section 14(3) of the Resource Management Act 1991.</i> <i>(g) Provide for:</i>	The damming and diversion of the Waikaka Stream is a non-consumptive use, and no allocation is necessary. There is no net loss to the catchment, and instead there is a slight gain from the discharge of dewatering water to the surface water catchment.

Objective / Policy Reference	Explanation	Comment
	(i) a level of permitted surface water abstraction, damming, diversion and use where there is a minimal risk of adverse effects; (ii) a primary allocation for consented water abstraction, damming, diversion and use; and (iii) a supplementary allocation for consented water abstraction, damming, diversion and use. (h) Require resource consent applications for surface water abstraction, damming, diversion and use to be supported by a level of information that corresponds to the level of risk of adverse environmental effects. (i) Ensure that surface water abstractions, damming or diversions with a high risk of adverse environmental effects, in conjunction with existing abstractions, damming and diversions, will not: (a) result in significant adverse ecological effects through the increase in time the relevant surface water body is at or below its minimum flows or levels; (b) compromise the availability and reliability of water supply for existing users; (c) result in significant adverse effects on the matters listed in Policy 16(b)(i) to (xvi).³² (j) Impose monitoring on resource consents for surface water abstraction, damming, diversion and use that corresponds to the level of risk of adverse environmental effects. (k) Where monitoring shows adverse environmental effects are occurring in a specific water body, remedy or mitigate those effects using one or more of the following methods: (i) reviewing the conditions of existing water consents for that water body in accordance with Section 128 of the Resource Management Act 1991; (ii) ceasing any further allocation of water from that water body; and (iii) imposing water restrictions in accordance with Policy 17 “Instigate appropriate water conservation procedures”.	
Policy 16	Environmental flow and level regimes (a) When granting resource consents for surface water abstraction, damming, diversion and use, the Council where appropriate will apply	The damming and diversion of the Waikaka Stream is overall non-consumptive, and a flow and level regime would not contribute to the

Objective / Policy Reference	Explanation	Comment
	<i>by way of consent conditions environmental flow and level regimes established under:</i> ... <i>(iii) Policy 16(b); and</i> <i>(iv) Policy 17.</i>	mitigation of any effects on the environment. A flow and level regime is not proposed and is not considered to be necessary.
Policy 21	Reasonable use of water <i>To ensure that the rate of abstraction and abstraction volumes specified on water permits to take and use water are no more than reasonable for the intended end use.</i>	The rates and volumes proposed are considered reasonable considering the nature of the project, for reasons outline in the Heller report (Attachment [K]).
Policy 22	Water measuring devices <i>Require, where appropriate, the installation of water measuring devices on all new permits to take and use water.</i>	The Applicant proposes to measure the take of groundwater by monitoring the flow rate after the pump, prior to dewatering water entering the settlement ponds.
Policy 23	Review of water permits <i>Impose a condition enabling the review of consent conditions in accordance with Sections 128 and 129 of the Resource Management Act 1991 on all new permits to take and use water.</i>	The Applicant accepts a standard review condition.
Chapter 5.2.2 Groundwater Policies		
Policy 25	Adverse effects arising from point source and non-point source discharges <i>To avoid, remedy or mitigate the adverse effects arising from point source and non-point source discharges so that there is no deterioration in groundwater quality after reasonable mixing, unless it is consistent with the promotion of the sustainable management of natural and physical resources, as set out in Part 2 of the Resource Management Act 1991, to do so.</i>	Based on the assessment of effects in section 5.5 of the AEE, the effects on groundwater quality are anticipated to be no more than minor and no overall deterioration in groundwater quality is expected.
Policy 26	Adverse effects of bores and wells <i>To avoid the adverse effects on groundwater quality and quantity arising from bores and wells by ensuring that bores and wells are appropriately designed, constructed and maintained in a way that adverse effects are avoided to the extent practicable.</i>	While the mine technically meets the definition of a 'bore', the method of operation will enable the avoidance of adverse effects on groundwater quality.
Policy 28	To manage groundwater abstraction <i>To manage groundwater abstraction to avoid significant adverse effects on:</i>	The proposal will not result in any significant effects on the matters raised in the policy. Effects on long term aquifer storage volumes are no more than minor considering the temporary nature of the activity,

Objective / Policy Reference	Explanation	Comment
	• <i>long-term aquifer storage volumes</i> • <i>existing water users</i> • <i>surface water flows and aquatic ecosystems and habitats</i> • <i>groundwater quality</i>	and proportion of estimated allocation available. Existing water users that may be affected have been identified in the technical assessment (Attachment [K]) and their supply will be protected by proposed conditions of consent whereby WGML will provide an alternative water source for any wells adversely affected. The effects on surface water flows will be net positive, due to the discharge of dewatering water to the Waikaka Stream. Effects on groundwater quality are managed by ensuring that only cleanfill material is backfilled into the mine pit.
Policy 29	Stream depletion effects <i>(a) Manage the stream depletion effect of any groundwater abstraction with a rate of take exceeding 2 litres per second as follows: (iii) where there is a moderate degree of hydraulic connection between the groundwater source and an adjacent surface water body, the stream depletion effect will be determined as the effect of 150 days of pumping at the continuous pump rate required to deliver the seasonal volume. The calculated rate of stream depletion will be managed in the same manner as a surface water abstraction for allocation purposes with the remainder of the abstraction included in the allocation volume for the relevant groundwater zone;</i> ...	The proposed dewatering has a calculated stream depletion effect of 5.1L/s, of an overall maximum instantaneous rate of 50L/s. The degree of hydraulic connection is therefore classified as moderate. While the policy directs that the calculated rate of stream depletion is to be managed as a surface water abstraction for allocation purposes, it is noted that the overall effect is non-consumptive due to the discharge of dewatering water back to the Waikaka Stream. For this reason, it is not considered to be appropriate to include the stream depletion component of the dewatering take in the surface water allocation for the Waikaka Stream. The policy does not require that the take is subject to a minimum flow regime and none is proposed.
Policy 30	Groundwater abstraction <i>(a) Use a staged management approach to allocate groundwater for abstraction in Southland to allow the knowledge gained by the progressive development of the region's groundwater resources to be built into its future management.</i> <i>(b) Recognise the different characteristics of the following aquifer types when managing groundwater abstraction: ...</i> <i>(c) Use an assessment of available hydrogeological information from resource consent applications supplemented by investigations and monitoring undertaken by the Council, on a case-by-case basis, to determine if an aquifer is confined. Where an aquifer is determined to be sufficiently confined to warrant management as a separate groundwater resource a preliminary allocation volume shall be determined on the basis of aquifer throughflow.</i>	The Heller report (Attachment [K]) provides an appropriate assessment of the nature of the target aquifers and a model of groundwater availability and through flow. Based on that information, the proposed dewatering take can be managed as part of a primary allocation from the groundwater resource. Due to the nature of the project, diminishing the rate of dewatering (groundwater take) is not operationally feasible. For this reason, the applicant has proposed conditions to protect existing users' security of supply. The Applicant will monitor the rate of groundwater take in accordance with industry standard practice. Due to the temporary nature of the proposal and based on the hydrological model provided in the Heller report, the proposal will not

Objective / Policy Reference	Explanation	Comment
	<i>(d) Provide for:</i> <i>(i) a level of permitted groundwater abstraction where there is a minimal risk of adverse effects;</i> <i>(ii) a primary allocation for consented water abstraction and use; and</i> <i>(iii) a supplementary allocation for consented water abstraction and use.</i> <i>(e) Require resource consent applications for groundwater abstractions to be supported by a level of information that corresponds to the level of risk of adverse environmental effects. Information to be supported by a conceptual hydrogeological model that corresponds to the level of allocation from the aquifer.</i> <i>(f) Where appropriate, impose minimum level and/or flow cut-offs and seasonal recovery triggers on resource consents for groundwater abstraction.</i> <i>(g) Impose monitoring on resource consents for groundwater abstractions that corresponds to the level of risk of adverse environmental effects.</i> <i>(h) Where monitoring shows adverse environmental effects are occurring in a specific groundwater zone, remedy or mitigate those effects using one or more of the following methods:</i> <i>...</i> <i>(i) Ensure that groundwater abstractions that have a high risk of adverse environmental effects will not result in:</i> <i>(i) a long-term decline in groundwater levels;</i> <i>(ii) surface water allocation regimes being exceeded.</i>	result in a long-term decline in groundwater levels, nor exceedance of surface water allocation regimes.
Policy 30	Interference effects <i>(a) Limit the cumulative interference effect of any new groundwater abstraction (in conjunction with other lawfully established groundwater takes) to no more than 20 percent of the available drawdown in any unconfined aquifer or up to 50 percent of the potentiometric head in any confined aquifer. The effects on any neighbouring bore will be considered where that bore is lawfully established and an assumption will be made that the bore fully penetrates the aquifer. An increased volume or increased pumping rate for any lawfully established</i>	The interference effects of the proposal have been assessed in the Heller report (Attachment [K]) and the AEE section 5.4.1. On the basis of a conservative assessment, a number of existing wells may be affected to a degree greater than that permissible by this policy. The exemption criteria in part (c) of the policy are only considered relevant in that the activity is a temporary mining activity, however it is not considered to be a short duration.

Objective / Policy Reference	Explanation	Comment
	<i>groundwater abstraction will be considered a new groundwater abstraction under this policy.</i> <i>(b) Limit the cumulative interference effect of any new groundwater abstraction on any bore that is notified to the Council and utilised for long-term monitoring of water levels to no more than 10 percent of the available drawdown in a unconfined aquifer, or no more than 20 percent of the available potentiometric head in a confined aquifer that exists 50 percent of the time during natural conditions when no pumping is occurring. An increased volume or increased pumping rate for any lawfully established groundwater abstraction will be considered a new groundwater abstraction under this policy.</i> <i>(c) An exception to clause (a) and (b) above may be appropriate for aquifer testing and necessary infrastructure works, and in certain circumstances for mining activities where dewatering occurs for a short duration.</i>	To mitigate effects on neighbouring bores, WGML will provide alternative water supply to affected bores, in accordance with the draft conditions proposed.
Chapter 5.2.3 Land and Soil Policies		
Policy 31A	Matching discharges onto or into land to risk <i>Match the level of management that is required for discharges of contaminants onto or into land to the level of environmental risk posed by the following risk factors:</i> <i>(a) Nature and quantity of contaminants in the discharge</i> <i>(b) Sloping land</i> <i>(c) Soils with artificial drainage or coarse structures</i> <i>(d) Soils with impeded drainage or low infiltration rates</i> <i>(e) Well drained soils</i> <i>(f) Climate</i> <i>(g) Proximity to groundwater</i> <i>(h) Proximity to surface water</i> <i>(i) Soil's current physical, chemical and biological characteristics and its potential to leach nutrients</i> <i>(j) Natural hazards (for example, flooding and erosion).</i>	Some discharge of 'contaminants' onto land is part of the proposal, the nature of contaminants (sediment in the process return water and stormwater) means that the level of environmental risk is very low. The settlement ponds will be located on a flat part of the site.
Policy 31C	Manage discharges of contaminants onto or into land <i>Manage discharges of contaminants onto or into land to avoid, remedy or mitigate adverse effects, including on:</i>	Soil quality will be protected by removing the topsoil and stockpiling separately prior to creating the settlement ponds. Local amenity values will be protected by the temporary nature of the proposal and

Objective / Policy Reference	Explanation	Comment
	(a) soil quality; (b) amenity values; (c) habitats, ecosystems and indigenous biological diversity; (d) historic heritage, cultural and traditional values; (e) natural character; (f) outstanding natural features.	settlement ponds will be mostly below ground level with grassed edges. The settlement ponds will not be located where they could impact on the values listed in (c) – (f) of the policy.
Chapter 5.2.4 River Bed (including beds of streams and modified watercourses) and Lake Bed Use and Development Policies		
Policy 32	Policy 32 – Manage structures and bed disturbance activities in the beds of rivers (including streams and modified watercourses) and lakes <i>Manage structures and bed disturbance activities in the beds of rivers and lakes, to avoid, remedy or mitigate adverse effects on:</i> (a) water quality and quantity; (b) habitats, ecosystems and fish passage where this is normally expected to occur; (c) indigenous biological diversity; (d) historic heritage, and the spiritual and cultural values and beliefs of the tangata whenua; (e) public access (except in circumstances where public health and safety are at risk) and amenity values; (f) natural character and outstanding natural features; (g) river morphology and dynamics, including erosion and sedimentation; (h) flood risk; (i) infrastructural assets; (j) navigational safety.	Proposed structures and bed disturbance activities have been designed to minimise adverse effects on the Waikaka Stream. In particular, • Effects on water quality are mitigated by construction methodology techniques described in the AEE section 5.7.1 to control erosion and trap sediment. • No effects on water quantity or historic heritage are anticipated from structures or bed disturbance activities. • Fish passage will be maintained per the AEE section 5.8.4. • Habitats and ecosystems will be affected to a significant but temporary degree, with planned rehabilitation of the affected river channel designed to achieve an improved quality of habitat value, ecosystem value and indigenous biodiversity over the medium-term. • Effects on tangata whenua values will be addressed through direct consultation. • Restrictions on public access will be temporary and necessary to protect public health and safety. Public access will be restored on completion of the project. • Natural character values of the Waikaka Stream will be adversely affected on a temporary basis, with this to be mitigated by the rehabilitation. There are no outstanding natural features to consider. • River morphology, dynamics and flooding will be maintained in the diversion channels and rehabilitated channels.

Objective / Policy Reference	Explanation	Comment
		There are no infrastructure assets to consider, and navigational safety will be unaffected, as the Waikaka Stream is not navigated by watercraft at the project location.
Policy 35	Stock access to surface water <i>(a) Encourage the exclusion of all stock from surface water bodies and artificial watercourses where practicable.</i> <i>(b) Ensure that when stock access to surface water bodies and artificial watercourses occurs, this is managed in a manner that avoids significant adverse effects on:</i> <i>(i) water quality;</i> <i>(ii) bed and bank integrity and stability;</i> <i>(iii) aquatic, riverine and riparian ecosystems and habitats.</i>	Stock currently have access to most surface water bodies within the project area, including the L&M pond, drains and the Waikaka Stream. WGL will carry out some waterway fencing as part of their rehabilitation programme.
Chapter 5.2.7 Landfill and Land Contamination Policies		
Policy 46	Discharge waste and cleanfill appropriately <i>Ensure the discharge of contaminants as waste or cleanfill occurs at an appropriate site.</i>	The mine pit is considered to be an appropriate location for the replacement of mined overburden, enabling the rehabilitation of mined area back to farmland.
Policy 47	Assess land contaminated by a hazardous substance <i>Assess the environmental risk of a discharge from land contaminated by a hazardous substance by using guideline values that are appropriate to the discharge and the site.</i>	There is no land contaminated by a hazardous substance located within the project area.

Table 6 Proposed Southland Water and Land Plan

* Objectives and Policies marked with * are under appeal as at 13/08/2024.

Objective / Policy Reference	Explanation	Comment
Region-wide Objectives and Policies		
Objective 1	<i>Land and water and associated ecosystems are sustainably managed as integrated natural resources, recognising the connectivity between surface water and groundwater, and between freshwater, land and the coast.</i>	It is considered that the proposal presents an appropriately integrated approach to the management of resources, and the mitigation proposed will enable the sustainable management of natural resources.
Objective 2	<i>The mauri of waterbodies provide for te hauora o te tangata (health and mauri of the people), te hauora o te taiao (health and mauri of the environment) and te hauora o te wai (health and mauri of the waterbody).</i>	The mauri of waterbodies has been given due regard, with the Applicant seeking to present an overall improvement to the quality of the Waikaka Stream, while contributing to additional improvements to waterbodies within the project area.
Objective 3	<i>Water and land is recognised as an enabler of primary production and the economic, social and cultural wellbeing of the region.</i>	The proposal provides for people to provide for their social and economic wellbeing. Feedback on effects on cultural wellbeing is sought through consultation with Tangata whenua.
Objective 4	<i>Tangata whenua values and interests are identified and reflected in the management of freshwater and associated ecosystems.</i>	WGML is seeking input from Tangata whenua directly, to ensure their values and interests are appropriately addressed.
Objective 5	<i>Ngāi Tahu have access to and sustainable customary use of, both commercial and non-commercial, mahinga kai resources, nohoanga, mātaītai and taiāpure.</i>	There are no known mahinga kai resources, nohoanga, mātaītai and taiāpure within the affected watercourses, though confirmation will be sought from Hokonui Runanga.
Objective 6	<i>Water quality in each freshwater body, coastal lagoon and estuary will be: (a) maintained where the water quality is not degraded; and (b) improved where the water quality is degraded by human activities.</i>	The proposal will not result in any overall long-term deterioration in water quality in the Waikaka Stream outside the reasonable mixing zone. Mitigation measures proposed in the AEE will ensure this outcome is met, by appropriately treating discharges to remove sediment and undertaking the diversion of the Waikaka Stream and Shepherd's Creek with good erosion and sediment control practices.
Objective 8	<i>(a) The quality of groundwater that meets both the Drinking Water Standards for New Zealand 2005 (revised 2008) and any freshwater objectives, including for connected surface</i>	The proposal will not adversely affect groundwater quality compliance with the drinking water standard. Controls proposed around the management of potential contaminant pathways, and positive

Objective / Policy Reference	Explanation	Comment
	<i>waterbodies, established under Freshwater Management Unit processes is maintained; and</i> <i>(b) The quality of groundwater that does not meet Objective 8(a) because of the effects of land use or discharge activities is progressively improved so that:</i> <i>1. groundwater (excluding aquifers where the ambient water quality is naturally less than the Drinking Water Standards for New Zealand 2005 (revised 2008)) meets the Drinking Water Standards for New Zealand 2005 (revised 2008); and</i> <i>2. groundwater meets any freshwater objectives and freshwater quality limits established under Freshwater Management Unit processes.</i>	pressure of groundwater into the mine pit, appropriately mitigate the risk of groundwater contamination.
Objective 9/9A	<i>The quantity of water in surface water bodies is managed so that:</i> <i>(a) the life-supporting capacity and aquatic ecosystem health, the values of outstanding natural features and landscapes, the natural character and the historic heritage values of waterbodies and their margins are safeguarded.</i> <i>(b) there is integration with the freshwater quality objectives (including the safeguarding of human health for recreation); and</i> <i>(c) provided that (a) and (b) are met, surface water is sustainably managed in accordance with Appendix K to support the reasonable needs of people and communities to provide for their economic, social and cultural wellbeing.</i>	The proposal will not reduce the amount of water available downstream within the Waikaka Stream.
Objective 11	<i>The amount of water abstracted is shown to be reasonable for its intended use and water is allocated and used efficiently.</i>	The rates and volumes proposed are considered reasonable considering the nature of the project, for reasons outline in the Heller report (Attachment [K]). Efficiency of use is achieved by recycling dewatering water for use as process water and return of the water to the Waikaka Stream. Due to the positioning of the pump, water cannot be abstracted beyond the minimum necessary to dewater the mine pit.
Objective 12	<i>Groundwater quantity is sustainably managed, including safeguarding the life-supporting capacity, ecosystem processes and indigenous</i>	The volume of groundwater to be abstracted by dewatering has been assessed as being approximately 43% of the predicted aquifer recharge, in combination with other existing takes. The volume of

Objective / Policy Reference	Explanation	Comment
	<i>species of surface water bodies where their flow is, at least in part, derived from groundwater.</i>	groundwater to be abstracted is therefore considered to be sustainable. Dewatered groundwater will be returned to the Waikaka Stream, replacing any stream depletion losses and safeguarding the life-supporting capacity, ecosystem processes and indigenous species of the Waikaka Stream.
Objective 13	<i>Provided that:</i> <i>(a) the quantity, quality and structure of soil resources are not irreversibly degraded through land use activities or discharges to land; and</i> <i>(b) the health of people and communities is safeguarded from the adverse effects of discharges of contaminants to land and water; and</i> <i>(c) ecosystems (including indigenous biological diversity and integrity of habitats), are safeguarded,</i> <i>then land and soils may be used and developed to enable the economic, social and cultural wellbeing of the region.</i>	The proposal will not irreversibly degrade the quantity, quality and structure of soil resources, as discussed in section 5.19 of the AEE. Topsoil will be stockpiled separately, and rehabilitation will be undertaken with the guidance of an agricultural consultant, in order to ensure the soil resource is protected. The proposal will not adversely affect the health of people and communities. The proposal may result in temporary impacts on aquatic ecosystems in the part of the Waikaka Stream and Shepherd's Creek to be diverted at the time. However, the Applicant plans to salvage and relocate fish species during diversions, ensuring continuous fish passage in both the stream and temporary diversion channels. Additionally, WGML propose to rehabilitate each section of diverted stream to a standard where the aquatic habitat quality and ecosystem will be at least as good as that prior to the diversion. This proposal is considered to meet all three limbs of the objective, enabling the use of land and soils for mining.
Objective 14	<i>The range and diversity of indigenous ecosystem types and habitats within rivers, estuaries, wetlands and lakes, including their margins, and their life-supporting capacity are maintained or enhanced.</i>	While the proposal will have temporary effect on the Waikaka Stream ecosystem, this will be remedied or mitigated by salvaging and relocating fish downstream during diversions, ensuring continuous fish passage in both the stream and temporary channels, and undertaking stream channel rehabilitation to a standard where the aquatic habitat quality and ecosystem will be at least as good as that prior to the diversion.
Objective 15	<i>Taonga species, as set out in Appendix M, and related habitats, are recognised and provided for.</i>	The project site is likely to provide some habitat for taonga species listed in Appendix L.

Objective / Policy Reference	Explanation	Comment
		Avifauna species, such as the paradise shelduck and teal are known to utilise the dredge ponds and L&M pond. As per the discussion in section 5.8.5, it is anticipated that these species may not frequent the ponds on the site where there is noise and activity but will likely return on completion of the work. Freshwater fish species such as upland bully, longfin eel and shortfin eel have been identified in the Waikaka Stream and some artificial watercourses. These will be salvaged and relocated if affected by the construction work. The rehabilitation proposed will restore habitat within the parts of the Waikaka Stream and Shepherd's Creek affected by the diversion. Plants around the Waikaka Stream riparian margin, such as rushes and sedges, will be removed, but will be replanted or replaced. Although a number of taonga species will be affected by the proposal, it is considered that the proposal appropriately recognises and provides for their restoration or protection.
Objective 16	<i>Public access to, and along, river and lake beds is maintained and enhanced, except in circumstances where public health and safety or significant indigenous biodiversity values are at risk.</i>	The proposal does restrict public access to parts of the Waikaka Stream channel for a temporary period. This is to prevent public access to an area of work where their health and safety could be at risk, or where rehabilitation is underway. Public access will be restored on completion of the project. Additionally, public access upstream of the project area will remain available throughout the project's duration.
Objective 17	<i>Preserve the natural character values of wetlands, rivers and lakes and their margins, including channel and bed form, rapids, seasonably variable flows and natural habitats, and protect them from inappropriate use and development.</i>	The natural character of the Waikaka Stream and Shepherd's Creek will be adversely affected by the diversion, albeit temporarily, and with rehabilitation and restoration to be undertaken as proposed in the AEE. The rehabilitation proposal replicates, as far as practicable, existing channel and bed form and natural habitat. Considering the temporary nature of the effect and the rehabilitation and restoration proposed, the project will not inappropriately impact the natural character of the Waikaka Stream and Shepherd's Creek.
Objective 18	<i>All persons implement environmental practices that optimise efficient resource use, safeguard the life supporting capacity of the region's</i>	The proposal incorporates a range of mitigation measures to ensure that the project will operate in a manner that achieves efficient

Objective / Policy Reference	Explanation	Comment
	<i>land and soils, and maintain or improve the quality and quantity of the region's water resources.</i>	resource use, safeguards the life supporting capacity of the site land and soils, and maintains the quality and quantity of water resources.
Objective 19	Fish passage (Clause 3.26 of NPSFM 2020) <i>The passage of fish is maintained, or is improved, by instream structures, except where it is desirable to prevent the passage of some fish species in order to protect desired fish species, their life stages, or their habitats.</i>	Fish passage is addressed in detail in section 5.8.4 of the AEE, noting that fish passage in the Waikaka Stream and/or the diversion channels will be maintained at all times. However, fish passage may be temporarily obstructed from farm drains while work is being undertaken, though any stranded fish will be salvaged by an appropriately qualified person.
Region-wide Policies		
Policy 2	Take into account iwi management plans <i>Any assessment of an activity covered by this Plan must;</i> <i>take into account any relevant iwi management plan; and</i> <i>assess water quality and quantity, taking into account Ngāi Tahu indicators of health.</i>	The AEE addresses the iwi management plan in section 6.2.11. Further consultation is ongoing with tangata whenua which would include feedback on these matters.
Policy 3	Ngāi Tahu ki Murihiku taonga species <i>To manage activities that adversely affect taonga species, identified in Appendix M, and their related habitats.</i>	The project site is likely to impact some taonga species listed in Appendix M. Avifauna species, such as the paradise shelduck and teal are known to utilise the dredge ponds and L&M pond. As per the discussion in section 5.8.5, it is anticipated that these species may not frequent the ponds on the site where there is noise and activity but will likely return on completion of the work. Freshwater fish species such as upland bully, longfin eel and shortfin eel have been identified in the Waikaka Stream and some artificial watercourses. These will be salvaged and relocated if affected by the work, and the rehabilitation proposed will restore habitat within the diverted sections of river. Plants around the Waikaka Stream and Shepherd's Creek riparian margin, such as rushes and sedges, will be removed, but will be replanted or replaced in the rehabilitated channel. Although a number of taonga species will be impacted by the proposal, it is considered that the mitigation measures proposed will reduce adverse effects on taonga species to a minor adverse effect.

Objective / Policy Reference	Explanation	Comment
Physiographic Zone Policies		
Policy 6	Gleyed <i>In the Gleyed physiographic zone, avoid, as a first priority, risk to water quality from contaminants, and where avoidance is impractical, requiring risk to water quality from contaminants to be minimised by:</i> <i>1. identifying contaminant pathways to ground and surface water bodies;</i> <i>2. requiring implementation of good management practices to manage adverse effects on water quality from contaminants transported via artificial drainage, and overland flow where relevant; and</i> <i>3. having particular regard to adverse effects on water quality from contaminants transported via artificial drainage, and overland flow where relevant when assessing resource consent applications and preparing or considering Farm Environmental Management Plans.</i>	Note – a small proportion of the site is located in the Gleyed physiographic zone. The proposal involves the discharge of dewatering water, process return water and stormwater via artificial channels to the Waikaka Stream. The effects of this discharge and mitigation measures proposed are covered in section 5.7.2 of the AEE and are considered to achieve the policy requirement to minimise risk to water quality by contaminants.
Policy 10	Oxidising <i>In the oxidizing physiographic zone;</i> <i>1. avoid, as a first priority, risk to water quality from contaminants, and where avoidance is impractical, requiring risk to water quality from contaminants to be minimised by:</i> <i>i. identifying contaminant pathways to ground and surface water bodies;</i> <i>ii. requiring implementation of good management practices to manage adverse effects on water quality from contaminants transported via deep drainage, and overland flow and artificial drainage where relevant;</i> <i>iii. having particular regard to adverse effects on water quality from contaminants transported via deep drainage, and overland flow and artificial drainage where relevant when assessing resource consent applications and preparing or considering Farm Environmental Management Plans; and</i> <i>3. avoid dairy farming and intensive winter grazing where contaminant losses will increase as a result of the proposed activity.</i>	Note – most of the project site is located in the oxidizing physiographic zone. The proposal involves the discharge of dewatering water, process return water and stormwater via artificial channels to the Waikaka Stream. The effects of this discharge and mitigation measures proposed are covered in section 5.7.2 of the AEE and are considered to achieve the policy requirement to minimise risk to water quality by contaminants.

Objective / Policy Reference	Explanation	Comment
Water Quality Policies		
Policy A4 of the NPSFW 2014	<i>1. When considering any application for a discharge the consent authority must have regard to the following matters:</i> <i>a. the extent to which the discharge would avoid contamination that will have an adverse effect on the life-supporting capacity of fresh water including on any ecosystem associated with fresh water and</i> <i>b. the extent to which it is feasible and dependable that any more than minor adverse effect on fresh water, and on any ecosystem associated with fresh water, resulting from the discharge would be avoided.</i> <i>2. When considering any application for a discharge the consent authority must have regard to the following matters:</i> <i>a. the extent to which the discharge would avoid contamination that will have an adverse effect on the health of people and communities as affected by their secondary contact with fresh water; and</i> <i>b. the extent to which it is feasible and dependable that any more than minor adverse effect on the health of people and communities as affected by their secondary contact with fresh water resulting from the discharge would be avoided.</i> <i>3. This policy applies to the following discharges (including a diffuse discharge by any person or animal):</i> <i>a. a new discharge or</i> <i>b. a change or increase in any discharge – of any contaminant into fresh water, or onto or into land in circumstances that may result in that contaminant (or, as a result of any natural process from the discharge of that contaminant, any other contaminant) entering fresh water.</i>	None of the discharges proposed are expected to have a significant effect on the life supporting capacity of fresh water and have been designed with mitigation measures to avoid as far as practicable, adverse effects on ecosystems and fresh water. The discharges will not adversely affect the health of people and communities as a result of secondary contact with the discharge.
Policy 13	Management of land use activities and discharges <i>1. Recognise that the use and development of Southland's land and water resources enables people and communities to provide for their social, economic and cultural wellbeing.</i> <i>2. Manage land use activities and discharges (point source and non-point source) to enable the achievement of Policies 15A, 15B and 15C.</i>	The proposal prioritises hiring local residents to strengthen the local economy and support community services. This promotes responsible land use to enhance social, economic, and cultural wellbeing. Commentary against Policies 15A, 15B and 15C is provided below.

Objective / Policy Reference	Explanation	Comment
Policy 14	Preference for discharges to land <i>Prefer discharges of contaminants to land over discharges of contaminants to water, unless adverse effects associated with a discharge to land are greater than a discharge to water. Particular regard shall be given to any adverse effects on cultural values associated with a discharge to water.</i>	The proposal acknowledges the preference for discharges to land over water but identifies operational and environmental constraints that make land discharge impractical for settling ponds. Discharging the Waikaka Diversion water to land is also deemed undesirable due to the goal of maintaining river flow, which offers a better environmental outcome. Despite these considerations, measures are proposed to manage adverse effects from water discharges effectively. Input is being sought from Hokonui Runanga to ensure appropriate consideration of cultural values associated with these discharges.
Policy 15A	Maintain water quality where standards are met <i>Where existing water quality meets the Appendix E Water Quality Standards or bed sediments meet the Appendix C ANZECC sediment guidelines, maintain water quality including by:</i> <i>avoiding, where reasonably practicable, or otherwise remedying or mitigating any adverse effects of discharges so that those standards or sediment guidelines will continue to be met (beyond the zone of reasonable mixing for point source discharges).</i> Approach where Appendix E or Appendix C standards are met <i>Where existing water quality meets the Appendix E Water Quality Standards or bed sediments meet the Appendix C ANZECC sediment guidelines, maintain water quality by: Avoiding where reasonably practicable or otherwise minimising any adverse effects, including residual adverse effects, of discharges, so that those standards or sediment guidelines will continue to be met (beyond the zone of reasonable mixing for point source discharges).</i>	The Waikaka Stream does not meet the lowland hard bed water quality standards for visual clarity and SQMCI parameters. However, all other measured parameters comply with these standards (see section 2.3.4 of the AEE). The proposal includes managing discharges from the Waikaka diversion flow, dewatering water, process return water, and stormwater to prevent new violations of existing water quality standards. Mitigation measures have been proposed as outlined in section 5.7 of the AEE in order to avoid to the extent practicable further decline against those parameters, after reasonable mixing.
Policy 15B	Approach where Appendix E or Appendix C standards are not met <i>Where existing water quality does not meet the Appendix E Water Quality Standards or bed sediments do not meet the Appendix C ANZECC sediment guidelines, water quality will be:</i> <i>1. maintained by avoiding any adverse effects of new point source discharges to surface water on water quality or sediment quality so that the exceedance of those standards or sediment guidelines is, as</i>	

Objective / Policy Reference	Explanation	Comment
	<i>a minimum, not exacerbated beyond the zone of reasonable mixing; and</i> <i>1a. maintained by avoiding, where reasonably practicable, or otherwise minimising any adverse effects, including residual adverse effects, on water quality or sediment quality from new discharges to land, new discharges to groundwater or new diffuse discharges to water so that the exceedance of those standards or sediment guidelines is, as a minimum, not exacerbated; and</i> <i>2. improved by requiring any application for the replacement of an expiring discharge permit, seeking a discharge permit for an existing but previously unconsented discharge, or seeking a different discharge permit for an existing activity, including a variation under ss 127-129 RMA which do not involve a new discharge, to demonstrate how adverse effects will be avoided where reasonably practicable and otherwise remedied or mitigated so that water quality will be improved to assist with meeting those standards or sediment guidelines (beyond the zone of reasonable mixing for point source discharges).</i>	
Policy 16A	Industrial and trade processes that may affect water quality <i>Subject to Policies 15A and 15B, require the adoption of best practicable option to manage the treatment and discharge of contaminants derived from industrial or trade processes.</i> <i>The adverse effects to be managed include effects on the quality of water and sediments in lakes, rivers, artificial watercourses, modified watercourses, wetlands, tidal estuaries, salt marshes and groundwater.</i>	Gold processing on site is an <i>industrial or trade process</i>, though mineral extraction is not. The Applicant proposes to utilise both a settling pond system and slimes treatment plant in order to provide treatment of the GRP process return water. It is considered this meets the policy requirement to use the best practicable option for the treatment of contaminants from an industrial or trade process.
Water Quantity Policies		
Policy B7 of the NPSFW 2014	<i>1. When considering any application the consent authority must have regard to the following matters:</i> <i>(a) the extent to which the change would adversely affect safeguarding the life-supporting capacity of fresh water and of any associated ecosystem; and</i> <i>(b) the extent to which it is feasible and dependable that any adverse effect on the life-supporting capacity of fresh water and of any associated ecosystem resulting from the change would be avoided.</i>	The proposal is not likely to result in a more than minor ‘adverse change in the natural variability of flows or level of any fresh water’ and therefore this policy is not considered relevant to the proposal.

Objective / Policy Reference	Explanation	Comment
	2. <i>This policy applies to:</i> (a) <i>any new activity; and</i> (b) <i>any change in the character, intensity or scale of any established activity –</i> <i>that involves any taking, using, damming or diverting of fresh water or draining of any wetland which is likely to result in any more than minor adverse change in the natural variability of flows or level of any fresh water, compared to that which immediately preceded the commencement of the new activity or the change in the established activity (or in the case of a change in an intermittent or seasonal activity, compared to that on the last occasion on which the activity was carried out).</i>	
Policy 20	Management of water resources <i>Manage the taking, abstraction, use, damming or diversion of surface water and groundwater so as to:</i> 1A. <i>recognise that the use and development (such as primary production) of Southland's land and water resources can have positive effects including enabling people and communities to provide for their social, economic and cultural wellbeing;</i> 1. <i>avoid where reasonably practicable, or otherwise remedy or mitigate, adverse effects from the use and development of surface water resources on:</i> a) <i>the quality and quantity of aquatic habitat, including the life supporting capacity and ecosystem health and processes of waterbodies;</i> b) <i>natural character values, natural features, and amenity, aesthetic and landscape values;</i> c) <i>areas of significant indigenous vegetation and significant habitats of indigenous fauna;</i> d) <i>recreational values;</i> e) <i>the spiritual and cultural values and beliefs of tangata whenua;</i> f) <i>water quality, including temperature and oxygen content;</i>	The positive effects of the proposal are outlined in section 5.23 of the AEE. Part 1 of the policy applies to the damming and diversion of the Waikaka Stream and Shepherd's Creek. The proposal may result in temporary effects on the quality and quantity of aquatic habitat, though the policy enables this to be remedied or mitigated. WGML propose rehabilitate the diverted sections of river channel to a standard where the aquatic habitat quality will be at least as good as that affected. The quantity of riverine aquatic habitat will be unchanged. Natural character, amenity and landscape values, vegetation and habitats of indigenous fauna will also be affected, though temporarily and mitigated by the Applicant's rehabilitation strategy, similar to the comments regarding aquatic habitat above. Effects on recreational values will be temporary and not significant, considering the limited stretch of the Waikaka Stream and Shepherd's Creek affected, with reference to the assessment in section 5.12 of the AEE. Effects on tangata whenua values will be addressed by specific consultation.

Objective / Policy Reference	Explanation	Comment
	g) <i>the reliability of supply for lawful existing surface water users, including those with existing, but not yet implemented, resource consents;</i> h) <i>groundwater quality and quantity;</i> i) <i>mātaītai, taiāpure and nohoanga; and</i> j) <i>historic heritage values.</i> 2. <i>avoid, where reasonably practicable, or otherwise remedy or mitigate, adverse effects from the use and development of groundwater resources on:</i> a) <i>long-term aquifer storage volumes;</i> b) <i>the reliability of supply for lawful existing groundwater users, including those with existing, but not yet implemented, resource consents;</i> c) <i>surface water flows and levels, particularly in spring-fed streams, natural wetlands, lakes, aquatic ecosystems and habitats (including life supporting capacity and ecosystem health and processes of waterbodies) and their natural character; and</i> d) <i>water quality, including temperature and oxygen content;</i> 3. <i>ensure water is used efficiently and reasonably by requiring that the rate and volume of abstraction specified on water permits to take and use water are no more than reasonable for the intended end use following the criteria established in Appendix O and Appendix L.4.</i>	Effects on water quality will be temporary, and WGML have proposed a number of mitigation measures to control sediment, as outlined in section 5.7.1 of the AEE. There are no effects on matters in parts (g) – (j) of the policy, as a result of the proposed diversion. Part 2 of the policy applies to the take and use of groundwater for dewatering the mine pit. Effects on long term aquifer storage volumes are no more than minor in light of the temporary nature of the activity, and proportion of estimated allocation available. Existing water users that may be affected have been identified in the technical assessment (Attachment [K]) and their supply will be protected by proposed conditions of consent whereby WGML will provide an alternative water source for any wells adversely affected. The effects on surface water flows will be net positive, due to the discharge of dewatering water to the Waikaka Stream. Effects on groundwater quality are managed by ensuring that only cleanfill material is backfilled into the mine pit. In regard to part 3 of the Policy, the rates and volumes proposed are considered reasonable considering the nature of the project, for reasons outline in the Heller report (Attachment [K]). The proposal will not result in wastage or inefficient use of water.
Policy 21	Allocation of water <i>Manage the allocation of surface water and groundwater by:</i> 1. <i>determining the primary allocation for confined aquifers not identified in Appendix L.5, following the methodology established in Appendix L.6;</i> 2. <i>determining that a water body is fully allocated when the total volume of water allocated through current resource consents and permitted activities is equal to either:</i> (a) <i>the maximum amount that may be allocated under the rules of this Plan, or</i> (b) <i>the provisions of any water conservation order;</i>	The damming and diversion of the Waikaka Stream is a non-consumptive use, and no allocation is necessary. There is no net loss to the catchment, and instead there is a slight gain from the discharge of dewatering water to the catchment. The Heller report (Attachment [K]) provides an appropriate assessment of the nature of the target aquifers and a model of groundwater availability and through flow. Based on that information, the proposed dewatering take can be managed as part of a primary allocation from the groundwater resource.

Objective / Policy Reference	Explanation	Comment
	3. enabling secondary allocation of surface water and groundwater subject to appropriate surface water environmental flow regimes, minimum lake and wetland water levels, minimum groundwater level cutoffs or seasonal recovery triggers, to ensure: (a) long-term aquifer storage volumes are maintained; and (b) the reliability of supply for existing groundwater users (including those with existing resource consents for groundwater takes that have not yet been implemented) is not adversely affected; 4. when considering levels of abstraction, recognise the need to exclude takes for non-consumptive uses that return the same amount (or more) water to the same aquifer or a hydraulically connected lake, river, modified watercourse or natural wetland.	
Policy 22	Management of the effects of groundwater and surface water use Manage the effects of surface and groundwater abstractions by: 1. avoiding allocating water to the extent that the effects on surface water flow would not safeguard the mauri of that waterway and mahinga kai, taonga species or the habitat of trout and salmon, in accordance with Appendix K; 2. ensuring interference effects are acceptable, in accordance with Appendix L.3 3. utilising the methodology established in Appendix L.2 to: a) manage the effects of consented groundwater abstractions on surface waterbodies; and b) assess and manage the effects of consented groundwater abstractions in groundwater management zones other than those specified in Appendix L.5.	There is no net loss of flow to the Waikaka Stream, and instead there is a slight gain from the discharge of dewatering water to the catchment. Interference effects have been identified in the technical assessment (Attachment [K]) and affected persons' water supply will be protected by proposed conditions of consent whereby WGML will provide an alternative water source for any wells adversely affected. Appendix L.2 addresses stream depletion effects. The proposed dewatering has a calculated stream depletion effect of 5.1L/s, of an overall maximum instantaneous rate of 50L/s. The degree of hydraulic connection is therefore classified as moderate. While Appendix L.2 directs that the calculated rate of stream depletion is to be managed as a surface water abstraction for allocation purposes, it is noted that the overall effect is non-consumptive due to the discharge of dewatering water back to the Waikaka Stream. For this reason, it is not considered to be appropriate to include the stream depletion component of the dewatering take in the surface water allocation for the Waikaka Stream. Appendix L.2 does not require that the take is subject to a minimum flow regime, and none is proposed.
Policy 23	Stream depletion effects Manage stream depletion effects resulting from groundwater takes which are classified as having a Riparian, Direct, High or Moderate	The proposed dewatering has a moderate degree of hydraulic connection to the Waikaka Stream. However, due to the non-consumptive nature of the project, the take will not exceed any

Objective / Policy Reference	Explanation	Comment
	hydraulic connection, as set out in Appendix L.2 Table L.2, to ensure the cumulative effect of those takes does not: 1. exceed any relevant surface water allocation regime (including those established under any water conservation order) for groundwater takes classified as Riparian, Direct, High or Moderate hydraulic connection; or 2. result in abstraction occurring when surface water flows or levels are less than prescribed minimum flows or groundwater levels for takes classified as Riparian, Direct or High hydraulic connection.	relevant surface water allocation regime and will not exacerbate any low flows.
Activities that affect water quality and quantity		
Policy 27	Bore construction and management <i>Require minimum standards for the construction, operation and maintenance of bores and wells.</i>	While the mine pit meets the definition of a 'bore', the method of operation will enable the avoidance of adverse effects on groundwater quality.
Policy 27A	Loss of river extent and values <i>The loss of river extent and values is avoided, unless the council is satisfied that:</i> 1. there is a functional need for the activity in that location; and 2. the effects of the activity are managed by applying the effects management hierarchy.	The Applicant has thoroughly evaluated alternative solutions and deemed the proposed temporary stream diversions as the most practical option, ensuring no overall net loss of river extent or values. The proposed plan seeks complete rehabilitation of the diverted sections of channel to its former course while enhancing ecological values, flood carrying capacity, and habitat quality. Expert engagement will ensure successful implementation, retaining original sinuosity and alignment features of the channel and introducing a mix of native and introduced species to stabilise the channel and mitigate temperature increases. After the rehabilitated sections of channel have been fully established there is expected to be no net loss of river extent, and a net gain in terms of river values, facilitated by the enhancements proposed by the Applicant.
Policy 28	Structures and bed disturbance activities of rivers (including modified watercourses) and lakes <i>a. Except where Policy 27A applies, - manage structures, bed disturbance activities and associated discharges in the beds and margins of lakes, rivers and modified watercourses, to avoid where reasonably practicable, or otherwise remedy or mitigate adverse effects on:</i>	Proposed structures and bed disturbance activities have been designed to minimise adverse effects on the Waikaka Stream. In particular: • Effects on water quality are mitigated by construction methodology techniques described in the AEE section 5.7.1 to control erosion and trap sediment.

Objective / Policy Reference	Explanation	Comment
	1. <i>water quality and quantity;</i> 2. <i>habitats, ecosystems and fish passage;</i> 3. <i>indigenous biological diversity;</i> 5. <i>the spiritual and cultural values and beliefs of the tangata whenua;</i> 6. <i>mātaihai and taiāpure;</i> 7. <i>public access (except in circumstances where public health and safety are at risk) and amenity values;</i> 8. <i>natural character values and outstanding natural features;</i> 9. <i>river morphology and dynamics, including erosion and sedimentation;</i> 10. <i>flood risk;</i> 11. <i>infrastructural assets;</i> 12. <i>navigational safety;</i> 13. <i>landscape values; and</i> 14. <i>historic heritage values.</i>	• No effects on water quantity are anticipated from structures or bed disturbance activities. • Fish passage will be maintained per the AEE section 5.8.4. • Habitats and ecosystems will be affected to a significant but temporary degree, with planned rehabilitation of the Waikaka Stream diversion channel designed to achieve an improved quality of habitat value, ecosystem value and indigenous biodiversity over the medium-term. • Effects on tangata whenua values will be addressed through direct consultation. • Effects on public access will be temporary and necessary to protect public health and safety. Public access will be restored on completion of the project. • Natural character and landscape values of the Waikaka Stream will be adversely affected on a temporary basis, with this to be mitigated by the rehabilitation of the new diversion channel. There are no outstanding natural features to consider. • River morphology, dynamics and flooding will be maintained in the new diversion channel. • There are no infrastructure assets to consider and navigational safety will be unaffected, as the Waikaka Stream is not navigated by watercraft at the project location. • The landscape will undergo temporary localised alterations primarily due to ground disturbance, excavation activities, and infrastructure development associated with the mining operation. This will be mitigated in part by high grassed bunds around road boundaries. • Expert advice from the Archaeological Authority have been sought in relation to a potential archaeological site within the project area.
Policy 32	Protect significant indigenous vegetation and habitat <i>Protect significant indigenous vegetation and significant habitats of indigenous fauna and maintain indigenous biodiversity associated with natural wetlands, lakes and rivers and their margins.</i>	Over the rehabilitation period, the proposal will contribute to indigenous biodiversity within the area of works. There are no identified areas of significant indigenous vegetation and significant habitats of indigenous fauna present on the application site.

Objective / Policy Reference	Explanation	Comment
Policy 35	Discharge waste and cleanfill appropriately <i>Ensure that sites used for the discharge of contaminants as waste or cleanfill are appropriate.</i>	The mine pit and L&M pond reclamation are considered to be appropriate locations for the replacement of mined overburden, enabling the rehabilitation of mined area back to farmland.
Policy 37	Climate change <i>Avoid or mitigate increased risks on the environment arising from climate change, taking into account the potential effects of rising sea levels and the potential for more variable and extreme weather patterns in coming decades.</i>	Effects relating to climate change are addressed in section 5.21 of the AEE. The site is unlikely to be affected by sea level change, however changes in weather patterns may result in changes to flooding patterns. The Waikaka diversion channel is designed for a 1 in 20 year AEP. This will avoid increased risk of flooding, as it is at least as good as the current Waikaka Stream channel.
Consideration of Resource Consent Applications		
Policy 40	Determining the term of resource consents <i>When determining the term of a resource consent consideration will be given, but not limited, to:</i> <i>1. granting a shorter duration than that sought by the applicant when there is uncertainty regarding the nature, scale, duration and frequency of adverse effects from the activity or the capacity of the resource;</i> <i>2. relevant tangata whenua values and Ngāi Tahu indicators of health;</i> <i>3. the duration sought by the applicant and reasons for the duration sought;</i> <i>4. the permanence and economic life of any capital investment;</i> <i>5. the desirability of applying a common expiry date for water permits that allocate water from the same resource or land use and discharges that may affect the quality of the same resource;</i> <i>6. the applicant's compliance with the conditions of any previous resource consent, and the applicant's adoption, particularly voluntarily, of good management practices; and</i> <i>7. the timing of development of FMU sections of this Plan, and whether granting a shorter or longer duration will better enable implementation of the revised frameworks established in those sections.</i>	The term of consent sought is 20 years. The duration sought is considered to allow for sufficient time for the mining activity and subsequent rehabilitation to occur, with contingency to account for the complex access arrangements required and economic uncertainties. The technical reports supporting the application give a reasonable degree of confidence in the likely adverse effects arising from the activity and there is a significant amount of capital investment required in the activity. The activity is not permanent, and the duration sought reflects that.
Policy 41	Matching monitoring to risk	Monitoring requirements are expected to be determined through discussions with Council.

Objective / Policy Reference	Explanation	Comment
	<i>Consider the risk of adverse environmental effects occurring and their likely magnitude when determining requirements for auditing and supply of monitoring information on resource consents.</i>	
Policy 42*	Consideration of water permit applications <i>When considering resource consent applications for water permits to take and use water:</i> <i>1. except for non-consumptive uses, consent will not be granted if a water body is over allocated or fully allocated; or to grant consent would result in a water body becoming over allocated or would not allow an allocation target for a water body to be achieved within a time period defined in this Plan;</i> <i>2. except for non-consumptive uses, consents replacing an expiring resource consent for an abstraction from an over-allocated water body will generally only be granted at a reduced rate, the reduction being proportional to the amount of over-allocation and previous use, using the method set out in Appendix O;</i> <i>3. installation of water measuring devices will be required on all new permits to take and use water and on existing permits in accordance with the Resource Management (Measurement and Reporting of Water Takes) Regulations 2010;</i> <i>4. where appropriate, minimum level or flow cut-offs and seasonal recovery triggers on resource consents for groundwater abstraction will be imposed; and</i> <i>5. conditions will be specified relating to a minimum flow or level, or environmental flow or level regime (which may include flow sharing), in accordance with Appendix K, for all new or replacement resource consents (except for water permits for non-consumptive uses, community water supplies and water bodies subject to minimum flow and level regimes established under any water conservation order) for:</i> <i>(a) surface water abstraction, damming, diversion and use; and</i> <i>(b) groundwater abstraction in accordance with Policy 23.</i>	In relation to the water permits sought: • The water permits will not result in overallocation of the resource. • The Applicant will monitor the rate of groundwater take in accordance with industry standard practice. • Minimum level or flow conditions are not considered appropriate. There is no net depletion of the surface water resource. It is not operationally feasible to cease dewatering if a minimum level is reached, and the groundwater resource is not overallocated.

Table 7 Regional Effluent Land Application Plan

Objective / Policy Reference	Explanation	Comment
Chapter 4.1 – Objectives		
Objective 4.1.1	Soil <i>To ensure that the life supporting capacity of the soil ecosystem is safeguarded from the adverse effects of discharges of effluent and sludge onto or into land.</i>	Gold processing on site is an <i>industrial or trade process</i> , though mineral extraction is not. The GRP process return water meets the definition of ‘effluent’ in this plan, and hence the Objectives and Policies are considered in relation to GRP process return water only. Noting that the content of the GRP process return water is the natural material (i.e. clays, silts, etc.) mixed with dewatering water, the discharge of the GRP process return water into the settlement ponds will not result in less than minor to nil adverse effects on the life supporting capacity of the soil ecosystem, water quality, human or animal health and amenity values. There are no known ancestral sites or wahi tapu sites, nor significant vegetation or habitats that may be affected by the settling ponds and GRP process return water.
Objective 4.1.2	Water <i>To ensure that water quality and the life supporting capacity of the water ecosystem is safeguarded from the adverse effects of discharges of effluent and sludge onto or into land which may enter water.</i>	
Objective 4.1.3	Human and animal health <i>To ensure that effluent and sludge discharges onto or into land do not adversely affect human and animal health.</i>	
Objective 4.1.4	Amenity values <i>To ensure that amenity values are not adversely affected by discharges of effluent and sludge onto or into land.</i>	
Objective 4.1.5	Takata whenua <i>To recognise and provide for the relationship of takata whenua with ancestral sites, wahi tapu and other taoka.</i>	
Objective 4.1.6	Significant vegetation and habitats <i>To ensure that effluent or sludge discharges onto or into land do not adversely affect areas of significant indigenous vegetation and significant habitats of indigenous fauna.</i>	
Chapter 4.2 –Policies		
Policy 4.2.1	Sustainability of the soil ecosystem <i>Protect the sustainability of the soil ecosystem from adverse effects of effluent and sludge discharges onto or into land.</i>	Topsoil will be removed from the settling pond area and stockpiled separately prior to any discharge occurring.
Policy 4.2.2	Discharge to land	The settling ponds provide an appropriate treatment facility to remove sediment from the GRP process return water, without significant adverse effects.

Objective / Policy Reference	Explanation	Comment
	<i>Utilise land treatment of effluent and sludge where this can be undertaken in a sustainable manner and without significant adverse effects.</i>	
Policy 4.2.3	Avoid where practicable, remedy or mitigate adverse effects on water <i>Avoid where practicable, remedy or mitigate adverse effects on water quality, water ecosystems and water potability from effluent and sludge discharges onto or into land.</i>	The settling ponds provide an appropriate treatment facility to remove sediment from the GRP process return water, enabling the mitigation of potential adverse effects on water resources.
Policy 4.2.4	Precautionary approach <i>Adopt a precautionary approach to the discharge of effluent and sludge onto or into land where there are uncertainties regarding adverse effects.</i>	There are no significant uncertainties regarding the discharge of GRP process return water.
Policy 4.2.7	Good practice and maintenance <i>Promote good practice and regular maintenance of effluent and sludge systems.</i>	WGML will undertake regular maintenance of the settling ponds, in accordance with industry good practise.
Policy 4.2.8	Takata whenua <i>Recognise and provide for takata whenua concerns related to the discharge of effluent and sludge onto or into land.</i>	Takata whenua concerns will be considered by direct consultation.
Policy 4.2.9	Amenity values <i>Avoid where practicable, remedy or mitigate any adverse effects on amenity values from discharges of effluent and sludge systems onto or into land.</i>	No adverse effects on amenity values arising from the settling ponds are anticipated, given they are mostly below ground level, and bounded by grassed areas.
Policy 4.2.10	Monitoring <i>Monitor, as appropriate, discharges of effluent and sludge onto or into land and, where practicable, the effects.</i>	Given the nature of the proposal, monitoring as proposed in the AEE section 3 is considered an appropriate approach.

Table 8 Gore District Plan

Objective / Policy Reference	Explanation	Comment
Chapter 2 – Matters of National Importance		
Objective 2.2.3	(1) To protect the districts outstanding natural features and landscapes.	The project area is not located within an Outstanding Natural Landscape or near any Outstanding Natural Features.
Objective 2.3.3	(1) To protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and to manage the adverse effects of land use activities.	The project area does not impact any areas of significant indigenous vegetation or significant habitats of indigenous fauna.
Objective 2.5.3	(1) Recognise and protect the heritage values of buildings, sites, structures and archaeological sites.	There are no identified heritage features within the project area. One potential archaeological site has been identified, as outlined in section 5.16 of the AEE, which is the subject of an Archaeological Authority.
Objective 2.6.3	(3) Enable access to mahinga kai sites. (4) Facilitate consultation with Ngāi Tahu to ensure that resource management issues of significance to them are had regard to in carrying out functions under the RMA.	The Applicant is not aware of any mahinga kai sites within the project area but will consult directly with iwi to confirm. Consultation with Ngāi Tahu is being carried out by WGML directly through Hokonui Runanga.
Policy 2.6.4	(3) Facilitate access to mahinga kai sites. (4) Meet with Ngāi Tahu on a regular basis to consider resource management issues of significance to them.	
Chapter 3 – Land Use Activities – A Framework		
Objectives 3.3	(1) Maintain and enhance the amenity values of the various localities within the District whilst respecting the different values and characteristics that exist within each area.	
	(2) Ensure that the effects of land use activities do not adversely affect the quality of the environment and are compatible with the characteristics and amenity values of each locality.	
	(3) Ensure that signs do not give rise to adverse effects on traffic safety, cause a danger to pedestrians, or impact adversely on amenity values.	The project site is located in a rural pastoral environment. The mine site will be visible and noticeable to people, the effects on amenity values will be mitigated by progressive rehabilitation of the mine, installation of bunds around the infrastructure area and SP1, and

Objective / Policy Reference	Explanation	Comment
		grassing long term stockpiles. Any adverse effects will be temporary and remedied by rehabilitation of the site.
	<i>(7) Ensure that the effects of earthworks and other land disturbance are avoided, remedied or mitigated.</i>	The proposed mine is considered to be compatible with the characteristics and amenity values of the locality, in part due to the rural, working farm nature of the surrounding environment, the mitigation proposed and the temporary nature of the proposal. Effects of noise are to be mitigated or have been assessed at a level that is compliant with District Plan standards. Lighting will be noticeable, but due to the distance to dwellings, is unlikely to be bothersome. The increase in vehicle movements will not be significant in the context of the existing traffic volume and the large number of heavy vehicle movements for the mine establishment phase will be temporary in duration. Overall, any effects on the quality of the environment will be appropriately mitigated.
	<i>(8) Avoid where practical the adverse effects of land use activities upon infrastructure.</i>	The mine pit has the potential to undermine local roads and infrastructure in the road corridor. WGML has engaged specialist geotechnical advice to design the mine pit walls appropriately considering the nature of the local geology, in order to protect local infrastructure from adverse effects.
Policies 3.4	<i>(2) Control the adverse effects of land use activities on the environment.</i>	Adverse effects of the proposed mining activity have been identified in the AEE, with appropriate measures volunteered to avoid, remedy or mitigate these.
	<i>(4) Enable advertising and other such signage, except where this will give rise to adverse effects on traffic safety, cause a danger to pedestrians, or impact adversely on amenity values.</i>	The proposed signage will not give rise to adverse effects on traffic safety, cause a danger to pedestrians, or impact adversely on amenity values, for reasons discussed above, hence should be enabled.
	<i>(10) Recognise that earthworks and disturbance of the ground is a necessary part of undertaking many activities.</i>	Earthworks are a necessary component of mining activity.
	<i>(11) Ensure that the effects of earthworks and other land disturbance are avoided, remedied or mitigated.</i>	Effects of the proposed earthworks are appropriately avoided, remedied or mitigated as described in the AEE and noted above.

Objective / Policy Reference	Explanation	Comment
	<i>(12) Require any adverse effects of land use activities upon infrastructure to be rectified.</i>	The geotechnical advice and design of the pit wall near infrastructure will avoid adverse effects on infrastructure.
Chapter 4A – Natural Hazards		
Objectives 4A.3	<i>(2) Minimise the risk to people and property from inundation.</i>	While the site is identified as subject to actual or potential flooding, relocating the activity to higher ground is not practical, nor would it decrease the adverse effects associated with flooding. Effects of flooding are addressed in section 5.10 of the AEE, with the proposal designed with contingency for flooding.
Policies 4A.4	<i>(2) On sites subject to actual or potential flooding, promote: a) identification and use of elevated ground for those activities that could be adversely affected by flooding; and b) elevated floor levels within any buildings.</i>	
Chapter 5 – Transportation		
Objective 5.3	<i>(1) Sustain the potential of the transportation routes to meet the reasonably foreseeable needs of future generations.</i>	The proposal will increase the amount of traffic on existing transportation routes, though for a temporary duration. Vehicle movements will use existing transport routes and, except for the establishment phase of mining, will form a small part of the total volume of traffic. Therefore, transportation routes will continue to meet reasonably foreseeable future needs and ongoing effects on amenity values from the use of transport routes will not be significant.
	<i>(3) Protect where practical the quality of the adjoining environment and amenity values from the adverse effects of the use of land transport routes.</i>	
Policies 5.4	<i>(1) Control the adverse effects of land use activities on transportation networks.</i>	The ongoing volume of traffic generated by the proposal will be approximately 10% of the existing volume. The volume of traffic for site establishment will be much larger as described in section 3.6.5 of the AEE, however this will be spread over a period of 3-4 months and subsequently will reduce. The effects on the adjoining environment and amenity values will be noticeable, but not significant.
	<i>(2) Control, where practical, the adverse effects of land transportation networks and their use on the adjoining environment and amenity values.</i>	
Chapter 6 – Hazardous Substances		
Objectives 6.3	<i>(1) Prevent or mitigate adverse environmental effects and risks associated with the use, storage, transportation, and disposal of hazardous substances.</i>	The proposal incorporates appropriate storage, use and contingency measures for the management of hazardous substances on the site, including a bunded storage area for fuel with secondary containment and spill mitigation measures. The quantum of fuel to be stored is considered appropriate to the scale of activity proposed, noting that it will be topped up every 2-3 days.
Policies 6.4	<i>(1) Limit the quantities of hazardous substances stored at sites to a level that is appropriate to the activities undertaken on that site and appropriate to the environment of that locality.</i>	

Table 9 Proposed Gore District Plan

Objective / Policy Reference	Explanation	Comment
Transport (TRANS)		
TRANS-O2	<i>The function and operation of the transport network is not compromised by land use activities and subdivision development.</i>	The proposal ensures the transport network's function is maintained by safely accommodating heavy and light vehicle movements, managing glare effects, and provision of safe access to the site.
TRANS-P2	<i>Recognise and protect the function of the transport network based on the identified street category and their local, regional or national significance by managing nearby land use, subdivision and development. Ensure that incompatible or sensitive activities, buildings and structures do not impact on the safe and efficient operation of the transport network by requiring appropriate separation or design to minimise adverse noise, amenity and/or reverse sensitivity effects.</i>	Vehicle access to the site is designed and managed in accordance with local standards to maintain safe and efficient operation of the transport network. Measures include constructing new access points compliant with council bylaws, providing sufficient parking on-site to prevent roadside parking, appropriate drainage of internal access roads, and implementing protocols for farm access unaffected by mining activities.
TRANS-P8	<i>Provide for a safe and efficient transport network by ensuring location, design and construction standards for land transport infrastructure are met that require:</i> <i>1. vehicle crossings to be located and have appropriate separation and sight distances for the type of road, speed environment and proximity to intersections and/or existing vehicle crossings;</i> <i>2. visibility to be maintained at railway crossings and road intersections;</i> <i>3. minimum dimensions and formation standards for the category and type of road, intersection, access or crossing;</i> <i>4. surfacing and drainage of roads, private access ways and vehicle crossings;</i> <i>5. manoeuvring space for vehicles access and parking areas.</i>	

Objective / Policy Reference	Explanation	Comment
Contaminated Lane (CL)		
CL-O1	<i>Land that is affected by soil contamination is identified, assessed, managed and monitored to minimise the risk to human health and protect the environment.</i>	Potentially contaminated land has been identified in the Preliminary Site Investigation (PSI). The PSI's targeted sampling confirms that the planned land use will not pose unacceptable risks to human health or the environment from soil contaminants.
CL-P2	<i>Require applicants proposing subdivision, use and development of land that is contaminated or potentially contaminated to manage the risk to human health and the environment to a level that is appropriate for the intended use.</i>	Additionally, the proposal commits to retaining disturbed soil onsite and conducting additional soil testing as needed to meet rehabilitation objectives, ensuring that any potential contamination is effectively managed and mitigated in accordance with the policy requirements.
Natural Hazards (NH)		
NH-O1	<i>Identify and manage the risks associated with natural hazards to human health, property, infrastructure and the wider environment</i>	The project site is on the Waikaka Stream flood plain. The proposal involves containment of all flows up to a 1:20 year AEP within the channel of the Waikaka Stream and constructed temporary diversion channels. This will ensure that the appropriate capacity is provided within channels impacted by the Applicant's works. Calculations undertaken account for effects of climate change. The proposal will not exacerbate flooding on other sites as flood flows overland will be diverted around the mine pit toward the Waikaka Stream, in accordance with their natural course. In extreme events, the mine pit may provide for some attenuation of flow by provision of temporary storage capacity. Management of flood risk will be undertaken in order to avoid flooding of the mine pit as a first preference. The Applicant's risk management plan will provide for trigger points to protect people and machinery in respect of more extreme events.
NH-O2	<i>The risks associated with natural hazards and their impact on people, property and the environment are recognised and avoided or mitigated, including the likely long-term effects of climate change.</i>	
NH-O3	<i>Ensure new subdivision and development activities are only located in areas where the natural hazard risk is:</i> <i>1. adequately managed; and</i> <i>2. not exacerbated on other sites.</i>	
NH-P2	<i>Manage the use, development and subdivision of land in all mapped Actual or Potential Inundation Areas, with the exception of the Stopbank Protection Areas by:</i> <i>1. ensuring that the activity is not likely to result in significant damage in a flood event; and</i> <i>2. maintaining the functioning of the flood plain, and not displacing water onto other properties; and</i>	The temporary diversion channels are designed to accommodate a 1 in 20-year flood event, ensuring that floodwaters are contained to the same level of flood event as the existing Waikaka Stream. A flood management plan will be established to determine the construction of temporary barriers, set trigger points, and outline actions during flooding events, ensuring proactive flood risk management.

Objective / Policy Reference	Explanation	Comment
	3. <i>requiring a minimum floor level for buildings above the 0.5% AEP design flood level; and</i> 4. <i>requiring hazardous substance storage to be resilient to inundation; and</i> 5. <i>ensuring adverse effects on people, cultural values, and property are avoided or mitigated; and</i> 6. <i>ensuring increased risk on other sites is avoided; and</i> 7. <i>requiring the identification of suitable buildable areas, for example via building platforms, at the time of subdivision.</i>	Measures such as maintaining freeboard in the temporary diversion channels, using temporary bunds for controlled water diversion, and adjusting dewatering rates during potential flooding events demonstrate a commitment to minimising adverse effects on downstream flooding and managing flood carrying capacity effectively. The proposal includes protocols to cease operations if hazardous conditions arise due to flooding, ensuring the safety of workers and preventing exacerbation of flood impacts.
NH-P5	<i>Manage subdivision, use and development in areas subject to risks of slope instability, subsidence and high liquefaction risk to demonstrate the appropriateness of the site for subdivision, use or development in a way that can avoid or mitigate hazard risks to people and property.</i>	The proposal has conducted comprehensive geotechnical assessments to mitigate risks of slope instability, subsidence, and liquefaction. Measures such as adjusting pit wall slope angles, implementing dewatering, ensuring trafficability of materials, and monitoring sensitive areas like the L&M pond aim to protect human safety and property integrity in an area potentially subject to geological hazards.
NH-P7	<i>Encourage the use, maintenance and enhancement of natural features and buffers such as riparian planting to manage the risks of natural hazards on people, property, and the environment.</i>	Rehabilitation of the diverted sections of river channel with riparian planting will help manage the risks of natural hazards to people, property, and the environment.
SITES AND AREAS OF SIGNIFICANCE TO MĀORI (SASM)		
SASM-O1	<i>All land, waterbodies, natural features, and marae within Gore District are recognised as sites and areas of cultural significance to mana whenua and/or tangata whenua, and are afforded appropriate considerations in relation to their management, development, and use.</i>	The Applicant acknowledges that this assessment would benefit from specific cultural advice. The Applicant seeks to avoid, remedy or mitigate any adverse effects on cultural values, and notes that consultation with Hokonui Rūnanga is ongoing.
SASM-O2	<i>Traditional and contemporary mana whenua and tangata whenua relationships with land, waterbodies, natural features, and cultural structures are recognised, retained, and strengthened.</i>	
SASM-O3	<i>Recognise and provide for the mātauranga and kaitiakitanga of mana whenua in decision-making relating impacts on the underlying relationship Ngāi Tahu hold with the natural environment.</i>	

Objective / Policy Reference	Explanation	Comment
SASM-P1	Use, subdivision, and development is enabled where adverse effects on Ngāi Tahu cultural values, including those listed in MW-2.3, are avoided, remedied or mitigated	
SASM-P2	The impact of proposed activities on Ngāi Tahu cultural values, and their underlying relationship with the natural environment is determined in partnership with Hokonui Rūnanga.	
Ecosystems and Indigenous Biodiversity (ECO)		
ECO-O1	Maintain Indigenous biological diversity in the Gore District and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna (Significant Natural Areas).	The project is not located in a SNA. While there may be some temporary loss of indigenous biodiversity, it is considered that the remediation proposed will achieve the policy aim of at least maintaining indigenous biodiversity values.
ECO-P6	Promote the restoration of indigenous biodiversity by prioritising: - SNAs whose ecological integrity is degraded: - threatened and rare ecosystems representative of naturally occurring and formerly present ecosystems: - areas that provide important connectivity or buffering functions: - natural inland wetlands whose ecological integrity is degraded or that no longer retain their indigenous vegetation or habitat for indigenous fauna: - areas of indigenous biodiversity on specified Māori land where restoration is advanced by the Māori landowners: - any other priorities specified in regional biodiversity strategies or any national priorities for indigenous biodiversity restoration.	The proposal will maintain ecological connections and corridors along the Waikaka River, by ensuring temporary diversion channels are constructed in a manner which provides for continuity of flow. Rehabilitated areas will be established and planted prior to removing the diversion channel. Additional planting of native species along the rehabilitated stream channels will ensure no overall net loss of indigenous vegetation. There is likely to be a reduction in native vegetation during the construction period, and a net increase to indigenous vegetation on completion of rehabilitation. There are no known rare or threatened indigenous species impacted by the proposal. There are no natural inland wetlands or areas of specified Māori land in the application site.
ECO-P8	When assessing consents for subdivision, land use and development, avoid effects which will: Prevent an indigenous species or community being able to persist in their habitats in the ecological district;	Some temporary loss of habitat will result from the proposal, as discussed in Section 5.8 of the AEE, however, riparian plants will be relocated where feasible, and predominantly native species will be used for rehabilitation, aiming for improved habitat. No rare or threatened indigenous species will be affected by the proposal.

Objective / Policy Reference	Explanation	Comment
	2. <i>Result in a degradation of the threat status, further measurable loss of indigenous cover or disruption to ecological processes, functions or connections in land environments in category one or two of the Threatened Environment Classification at the ecological district level;</i> 3. <i>Result in a reduction in the local population of threatened taxa in the Department of Conservation Threat Categories 1 – 3a - nationally critical, nationally endangered and nationally vulnerable; and</i> 4. <i>discourage mana whenua access to indigenous biodiversity for a mana whenua cultural purpose .</i>	Temporary restrictions on public access to ensure public safety are outlined in Section 5.12 of the AEE.
ECO-P10	<i>Maintain indigenous biodiversity across the district by:</i> 1. <i>Managing any significant adverse effects of new subdivision, use or development by applying the effects management hierarchy;</i> 2. <i>Managing the adverse effects of new subdivision, use or development on highly mobile fauna areas in order to maintain viable populations of specified highly mobile fauna across their natural range</i> 3. <i>Maintaining, and where appropriate enhancing or restoring, the functioning of ecological corridors and linkages;</i> 4. <i>Minimising adverse effects on, and encouraging mana whenua access to, areas of indigenous biodiversity which are significant to mana whenua;</i> 5. <i>Establishing a Biodiversity Stakeholder Group to review District Plan provisions, encourage non-regulatory assistance, and enhance landowner engagement;</i> 6. <i>Developing a biodiversity strategy that would consider free ecological surveys, financial support to Significant Natural Area landowners, rates remissions for Significant Natural Areas, and advice and support for local conservation groups and programmes;</i>	The potential impacts on indigenous biodiversity will be mitigated through native plantings and cobble substrate, following the effects management hierarchy. Temporary disturbance to local waterbirds is expected but it is anticipated they will return. Native vegetation is prioritised to restore ecological corridors and temporary public access restrictions is essential for maintaining public safety. No rare or threatened indigenous species are affected.

Objective / Policy Reference	Explanation	Comment
	7. <i>Preserving protected wildlife; and</i> 8. <i>Recognising the benefits of farm management practices and active management of indigenous biodiversity, including voluntary animal and plant pest and stock control and/or formal legal protection.</i>	
Public Access (PA)		
PA-O1	<i>Public access is provided to and along waterbodies with high recreational, scenic, Ngāi Tahu cultural or amenity values.</i>	The proposal does restrict public access to parts of the Waikaka Stream channel for a temporary period, however, this is to prevent public access to an area of work where their health and safety could be at risk. Public access to the parts of the Waikaka Stream not affected by the proposed work will remain available.
PA-P2	<i>Maintain and enhance public access by:</i> 1. <i>requiring through the subdivision process the provision of esplanade reserves and/or esplanade strips along waterbodies, particularly in urban areas and along public access corridors. Public access to and along the Mataura River, and access for licensed sports fishers to and along Waikaka Stream, shall generally be provided by way of esplanade strips.</i> 2. <i>requiring through the land development process, where practicable, works and buildings to be set back from public access corridors.</i> 3. <i>negotiating for access strips and access links that achieve future public access corridors including utilising unformed legal roads.</i> 4. <i>require buildings and structures to be setback from rivers and streams.</i> 5. <i>encourage native riparian planting.</i>	Public access to the Waikaka Stream through existing access points will be maintained throughout the project's duration. Temporary restrictions on downstream access are planned for safety reasons. Emphasis will be placed on riparian planting during riverbank rehabilitation, aiming to minimise disruptions and improve access conditions.
PA-P5	<i>Restrict public access in areas that would result in adverse effects on natural character, indigenous biodiversity, historic heritage, cultural, landscape values or health and safety.</i>	Restriction to public access forms part of the proposal and is necessary for public safety. Restrictions to public access to the

Objective / Policy Reference	Explanation	Comment
		Waikaka Stream bed will be temporary, as outlined in the AEE section 5.12.
Earthworks (EW)		
EW-O1	<i>Earthworks and land disturbance for subdivision, land use and development are facilitated and undertaken in a manner that minimises adverse effects on the surrounding environment and protects the natural environment, Ngāi Tahu cultural values, people and property.</i>	The proposal involves a considerable volume of earthworks. Effects of the proposed land disturbance and earthworks will be appropriately mitigated by rehabilitating the land back to farmland after the completion of mining. Topsoil will be stockpiled separately, and rehabilitation will be undertaken with the guidance of an agricultural consultant, in order to ensure the quality of farmland is restored. Effects of earthworks on noise, dust and amenity values will be addressed appropriately by the various mitigation measures discussed in the AEE sections 5.11 and 5.17.
EW-P4	<i>Require earthworks to be appropriately designed, located and undertaken so that:</i> <i>1. the cut depth and fill height does detract from the amenity or stability of other sites;</i> <i>2. unretained batters are designed and managed to ensure people and property are protected;</i> <i>3. earthworks near rivers and streams are managed to ensure river and stream values are maintained or enhanced;</i> <i>4. earthworks on steeper slopes are managed the ensure land stability is maintained;</i> <i>5. dust, sediment and erosion are controlled to protect land stability, air, soil and water quality;</i> <i>6. the area of disturbed ground is stabilised and replanted in a timely manner to minimise visual effects, dust, sediment or erosion; and</i> <i>7. accidental discovery protocol inclusive of Ngāi Tahu tikanga and values is followed in the event of discovery of sensitive material or unknown archaeological sites.</i>	T+T has assessed the geotechnical effects of the proposal and recommended appropriate setbacks from surrounding roads, streams and ponds to ensure there are no adverse off-site stability impacts. Amenity impacts of the earthworks are addressed in section 5.17 of the AEE; while earthworks are partially screened, they are also temporary and not out of context with rural activities. The effects of earthworks on streams will be managed through setbacks and erosion and sediment control measures, and rehabilitation of the site. Appropriate dust control measures will be utilised to ensure effects are minimised. Progressive rehabilitation is proposed, and this will contribute to minimising visual effects, dust, sediment and erosion. The Applicant agrees to an accidental discovery protocol.

Objective / Policy Reference	Explanation	Comment
EW-P5	<i>Manage earthworks that are of a nature, scale or in a location where there may be adverse effects to ensure that:</i> <i>1. the earthworks do not exacerbate or create any natural hazard, such as impact on land stability or inundation or flooding effects on other sites;</i> <i>2. the natural character of rivers and their margins are preserved and water quality, stream health, the intrinsic values of ecosystems, Ngāi Tahu cultural values, and public access are maintained or enhanced;</i> <i>3. the design, location and undertaking of earthworks recognise Ngāi Tahu cultural values associated with the area, including a consideration of cultural landscapes, protects archaeological sites and cultural sites of significance, and limits any adverse effects on the underlying relationship Ngāi Tahu hold with the natural environment;</i> <i>4. any changes to the natural landform minimise the visual effects on the landscape character, and indigenous vegetation is maintained, replaced or enhanced;</i> <i>5. the safe and efficient functioning of the transport network or regionally significant infrastructure is not impacted; and</i> <i>6. they are compatible with the character of the underlying zone and anticipated amenity values of surrounding sites are maintained by controlling:</i> <i>(a) ongoing adverse effects such as visual effects, overlooking, shading or dominance from the bulk and scale;</i> <i>(b) potential short term adverse effects such as the visual appearance of the works, dust, noise and vibration and traffic effects.</i>	The T+T geotechnical report confirms that the proposed earthworks can be undertaken without causing land instability. The mine pit will provide additional floodplain capacity, if flooded, and diversion channel and temporary bunds are designed to a level that aligns with the existing Waikaka Stream channel capacity, hence no exacerbation of flooding on any other party is anticipated. The natural character of the rivers will be disrupted during the works, however the proposal includes rehabilitation and enhancement planting, achieving an overall benefit to the river margin, stream health and ecosystems. Public access disruptions will be temporary and restored on completion of the work. The Applicant has designed the proposal in response to feedback from Hokonui Rūnanga in order to minimise effects on cultural values and consultation will continue. Archaeological sites have been investigated and the Applicant proposes an accidental discovery protocol condition. The creation of stockpile SP1 will result in temporary changes to landform, though the V+E Report (Attachment R]) confirms that the effects on landscape character are remedied by rehabilitation of the site. The proposal will not compromise the safe and efficient functioning of the transport network, given appropriate vehicle access construction and the relatively low number of vehicle movements. The earthworks will create temporary adverse visual amenity effects, which V+E assess as low-moderate during the operation and remedied entirely on rehabilitation (Attachment [R]). The proposed activity can only occur in a rural environment and some screening will reduce visual effects.
Light (LIGHT)		

Objective / Policy Reference	Explanation	Comment
LIGHT-O1	Activities are able to use artificial outdoor lighting for operational and functional purposes and to provide for the security and safety of people and properties	Lighting is required to enable operation of the activity outside daylight hours. Lighting includes fixed lighting around the infrastructure area, vehicle access lighting and mobile mine pit lighting. Lighting will be designed to ensure it is appropriate for the facility, while minimising light spill to the public road and nearby residences. Lighting is proposed to be directed downward, cowled and only used in locations where lighting is necessary during hours of darkness. Glare from on-site lighting will be minimised through the use of cowls and directing lights downward. Nearby properties and public spaces are well set back from the site such that glare and shading are unlikely to interfere with amenity values.
LIGHT-O2	Artificial outdoor lighting is located, designed and operated to maintain the character and amenity values within zones, and so that it does not adversely affect the health and safety of people, the natural life cycles of indigenous species and the safe operation of the transport network and views of the night sky.	
LIGHT-P1	Enable activities that generate an appropriate level of artificial lighting for operational and functional purposes while maintaining the predominant character and amenity of each zone.	
LIGHT-P2	Require artificial lighting to be located, designed and operated to: 1. control the maximum level of light spill; 2. manage adverse light spill effects to: (a) maintain people’s ability to view the night sky and protect intrinsically dark landscapes. (b) protect the health and well-being of people, ecosystems and indigenous species. (c) ensure safe and efficient operation of the transport network. 3. ensure safe and efficient operation of roads and public pedestrian areas by incorporating Crime Prevention Through Environmental Design (CPTED) principles.	
Noise (NOISE)		
NOISE-O1	Recognise and provide for activities that generate noise whilst ensuring that the character, timing and duration of noise levels are compatible with the purpose and character of each zone.	The proposal aims to ensure that noise levels align with the character, timing, and duration appropriate for the designated zone. Measures such as using broadband reversing alarms instead of tonal ones are proposed to mitigate disruptive noise features.

Objective / Policy Reference	Explanation	Comment
NOISE-O2	<i>Activities do not generate unreasonable noise effects which adversely affect amenity values and health and wellbeing of people and communities.</i>	The proposed activity can be managed in a manner to avoid detracting from the rural amenity values for immediate neighbours, by controlling noise in the manner described in section 5 of the AEE.
NOISE-P2	<i>Ensure the health and wellbeing of people and the community is protected by managing noise effects generated by an activity, having regard to:</i> <i>1. the frequency, intensity, duration and offensiveness of the noise being generated;</i> <i>2. whether the level, intensity, character and timing of effects are compatible with the character and amenity of the location and adjacent activities;</i> <i>3. internalisation of noise effects to the extent practicable and to avoid or minimise conflict at and beyond site boundaries;</i> <i>4. any impact on the health and well-being of the surrounding community (including sleep disturbance);</i> <i>5. the adoption/implementation of best practicable options to minimise the adverse effects;</i> <i>6. any positive effects associated with the activity;</i> <i>7. The extent to which noise levels may compromise the ability of existing and anticipated activities to operate or establish in the future without undue constraints; and</i> <i>8. the ability to avoid conflict with existing and anticipated noise sensitive activities.</i>	Noise has been assessed in section 5.17.5 of the AEE. With regard to the factors identified in the policy, it is considered that noise can be managed appropriately on the site.
SIGNS – (SIGN)		
SIGN-O1	<i>Signage is consistent with the purpose, character and amenity of the zone where it is located.</i>	Signage will be utilised to identify the site and provide essential information, including health and safety information. Signage will be located at access points to the site. This is considered to be consistent with the purpose, character and amenity of the zone.
SIGN-O2	<i>Signage does not affect the safety of users of the transportation network, including pedestrians and cyclists.</i>	Signage at vehicle access will provide essential safety information, including site operator details, hazards, and contact information, ensuring effective visitor communication. Positioned strategically and

Objective / Policy Reference	Explanation	Comment
		appropriately sized, signs will minimise adverse impacts on road safety and amenity values while meeting transportation network user needs, as detailed in section 5.14 of the AEE.
SIGN-P1	<i>Enable signage which promote goods, services, cultural associations or events associated with activities being undertaken on the site where the sign is located.</i>	The signage will only be used to display information pertinent to the activity being undertaken on the site, consistent with this policy.
SIGN-P2	<i>Avoid the location of signage within legal roadways, except for official signage.</i>	Part of a legal road (unformed) administered by GDC falls within the project area. Signage will be avoided within this legal roadway. Signage will be installed within the private property boundary.
SIGN-P3	<i>Ensure signs are of a type, scale and design which is appropriate for the location by having regard to the following:</i> <i>1. the safety of road users including pedestrians.</i> <i>2. the amenity values, local character, cultural relationships and streetscape.</i> <i>3. the effects of signage on the character and amenity values of the Town Centre and Local Centre Core Precincts in Gore and Mataura.</i> <i>4. whether the sign is in proportion to the scale of the building and any architectural features on the building.</i>	Signage for the project has not yet been designed. However, the Applicant anticipates a sign will be installed at the vehicle access. Additional signs may be installed at boundary locations advising that there is no public access for health and safety reasons. These advisory signs will be discreet yet visible to align with location appropriateness, road user safety, and local character. Inside the site, traffic management and water hazard signs will be strategically placed to preserve amenity values without impacting public spaces.
SIGN-P4	<i>Avoid signs which generate glare or light spill through flashing lights.</i>	No signs with flashing lights are proposed.
General Rural (GRUZ)		
GRUZ-O1	<i>Recognise the importance of primary production and rural industry to the social and economic wellbeing of the District.</i>	The definition of primary production includes both agricultural activities and mining activities. The PGDP recognises that mining can contribute to the social and economic wellbeing of the district, and these effects are discussed in section 5.20 of the AEE. The project site land is currently used for agricultural primary production and will be returned to that use on completion of mining.
GRUZ-O2	<i>The character and qualities of the General Rural zone comprise:</i> <i>1. a variety of primary production activities; and</i>	Mining is one of the primary productive land uses that the PGDP identifies as comprising part of the character and qualities of the General Rural Zone. The proposal does include some built form,

Objective / Policy Reference	Explanation	Comment
	2. a very low degree of built form, well setback from other properties and roads; and 3. high levels of open space and open pasture or crops; and 4. high levels of rural amenity from adjacent sites.	however these are well set back from neighbours and road boundaries, maintaining a sense of openness. High levels of rural amenity is considered to include an environment where there are a 'variety of primary production activities'; essentially, a working rural environment. The V+E report (Attachment [R]) notes that, mining activity is one that only ever occurs in a rural landscape. As the relevant objectives and policies reflect, it is a primary production activity; one that is not at odds with a rural landscape, but the scale of which will cause some disruption. The historical association of this site and the wider locality with mining is noted.
GRUZ-O3	<i>Non-primary production activities that support primary production or rely on a rural location are provided for, while managing the nature, scale and location of such activities.</i>	Ancillary activities to mining will occur on the site (for example, the site office, workshop etc.), however these activities directly support the mining primary production activity.
GRUZ-O5	<i>The value and long-term benefits of using highly productive land for primary production is recognised and the availability of highly productive land for primary production for future generations is protected.</i>	The proposal maintains the land's agricultural primary production capacity with measures like rehabilitation criteria, soil assessments, and topsoil management, ensuring it remains viable for agricultural purposes both during and after mining.
GRUZ-P1	<i>Enable existing and future primary production.</i>	The proposed mine is enabled by this policy, as it is a form of 'primary production'. Further, the site will be returned to productive agricultural use post-mining, further enabling primary productive use of this land.
GRUZ-P5	<i>Recognise the benefits of quarrying and mining activities on the local economy and supporting associated industries through enabling small scale quarries and mines.</i>	The social and economic benefits of the proposal are identified in section 5 of the AEE, and it is appropriate to recognise the provision of local and regional benefits arising from the proposal.
GRUZ-P6	<i>Manage the environmental and cultural effects of quarrying and mining and avoid quarrying and mining activities that result in adverse cultural or environmental effects that cannot be avoided, mitigated or offset.</i>	The AEE describes in detail the range of potential environmental effects and how these are to be addressed such that effects are avoided, mitigated or offset. The Applicant continues to consult with Hokonui Rūnanga regarding cultural effects of the proposal.
GRUZ-P10	<i>Protect highly productive land from irreversible loss from inappropriate subdivision, use and development, including by:</i>	The land is currently utilised for land-based primary production and will revert to this use post-mining. Measures such as rehabilitation criteria, pre-mining soil and productivity assessments, and topsoil management preserve the land's productivity. The proposal avoids

Objective / Policy Reference	Explanation	Comment
	1. <i>avoiding subdivision and land fragmentation below the minimum densities that compromises the use of highly productive land for primary production;</i> 2. <i>avoiding uncoordinated urban expansion on highly productive land that has not been subject to a strategic planning process; and</i> 3. <i>avoiding and mitigating reverse sensitivity effects from sensitive and incompatible activities within and adjacent to highly productive land.</i>	adverse reverse sensitivity effects on nearby land-based primary production activities.
GRUZ-P11	<i>Avoid activities that are incompatible with the character, qualities and purpose of the General Rural Zone, unless there is an operational or functional need for it to be located in the General Rural zone.</i>	The proposed mine is not considered to be incompatible with the character, qualities and purpose of the General Rural Zone, with consideration to the mitigation of the effects of the proposal and the generally enabling policy framework in relation to mining in the Zone.
GRUZ-P12	<i>Require activities and development to maintain rural character, rural amenity and the underlying Ngāi Tahu relationships with the natural environment by:</i> 1. <i>ensuring that buildings and structures are of a scale and height which is compatible with the rural character and amenity of the zone; and</i> 2. <i>requiring appropriate setbacks to waterways to maintain and enhance amenity values and natural character.</i>	The proposed activity will be managed in a manner to avoid detracting from the rural character and amenity values for immediate neighbours, as described in section 5 of the AEE. Ongoing consultation with tangata whenua continues to ensure that Ngāi Tahu relationships with the natural environment will be maintained. While the mining operation will be visible from surrounding areas, including legal roads and properties near the Waikaka River and Shepherd's Creek, temporary visual impacts will vary as mining progresses according to the sequencing plan. Post-mining, the land will be rehabilitated to restore its pastoral state and productive quality, including enhancing native vegetation along the new Waikaka Stream diversion channel. Structures and buildings forming part of the activity are small scale and well set back from neighbours and boundaries and are considered to be consistent with the rural character and amenity of the zone. A 30m setback is proposed to waterways except where diversion works will take place.

Table 10 Te Tangi a Tauira - The Cry of the People: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008

Ngā Kaupapa – Policy Reference	Explanation	Comment
Chapter 3.1.2 Climate Change - Economy and Industry		
3.	<i>Support improvement of existing technologies to reduce emission and discharge levels and support movement toward new and efficient forms of technology as they develop. Support development of more efficient use of renewable energy sources.</i>	WGML have considered the use of electric vehicles but consider that this technology is not currently appropriate for the project. WGML will electrify operations wherever possible, including the GRP, STP and pumps.
Chapter 3.2.1 Air - Discharges to Air		
1.	<i>Discourage discharges from industrial and trade premises that will have an impact on mahinga kai, taonga species, biodiversity, wāhi tapu and wāhi taonga.</i>	Dust arising from the project earthworks are expected to be controlled on site, and not affect mahinga kai, taonga species, biodiversity, wāhi tapu and wāhi taonga.
10.	<i>Ensure that discharges of contaminants into the air such as dust, smoke and odour do not affect the amenity values of areas which are of cultural and historical significance to iwi.</i>	Dust arising from the project earthworks are expected to be controlled on site, and not affect the amenity values of areas of significance to iwi.
12.	<i>Engage Ngāi Tahu ki Murihiku early in the consenting and permitting process for activities whereby there is discharge to air, particularly agrichemical and aerial spraying/topdressing and activities causing offensive odours. ...</i>	WGML are engaging with tangata whenua before lodging the consent application, and consultation will be ongoing.
13.	<i>Advocate for robust consent conditions with a maximum twenty-five years.</i>	A 20-year resource consent duration is sought.
15.	<i>Encourage techniques to eliminate the effects of light pollution.</i>	Lighting is proposed to be directed downward, cowled and only used in locations where lighting is necessary during hours of darkness.
Chapter 3.2.2 Air – Amenity Values		
1.	<i>Limit through promotion of improved production and techniques, visual and physical effects from activities associated with exhaust emissions, dust, unacceptable and intense odour, smoke and lighting.</i>	Good management practices will be used to control dust to avoid visual and physical effects off site.

Ngā Kaupapa – Policy Reference	Explanation	Comment
2.	<i>Ensure where avoidable that impacts from activities that create effects such as glare, shading, or electrical disturbance do not interfere with the amenity values associated with a place, environment or neighbouring property.</i>	Glare from on-site lighting will be minimised through the use of cowls and directing lights downward. Nearby properties and public spaces are well set back from the site such that glare and shading are unlikely to interfere with amenity values.
6.	<i>Where there may be visual impacts on the natural and cultural landscapes as a result of development, encourage the integration of landscaping techniques which utilise reserve planting or vegetation screens to soften intrusion.</i>	The proposal will have temporary visual impacts for the life of the mining activity, though these will be completely remediated on completion of the project. For the project duration, partial bunding of the site and progressive rehabilitation will be used to mitigate visual impacts.
Chapter 3.5.3 Southland Plains – Solid Waste Management		
1.	<i>Use Resource Management Act planning processes, including input into statutory plans, best practice guidelines, hearing panels and resource consent conditions, to ensure that solid waste disposal does not adversely affect tangata whenua values.</i>	Noting that the introductory paragraph identifies mine tailings as a solid waste relevant to this section. The mine tailings produced by the proposed gold extraction activity will comprise water and natural material. There are no chemical contaminants. To this end, the replacement of the tailings in the mine void is not considered to adversely affect the environment and is an appropriate methodology to ensure that the mine void is backfilled. The duration sought is 20 years, which is equivalent to the mine life plus full rehabilitation, plus contingency to allow for external factors. While disposal of tailings will occur near the Waikaka Stream, due to the nature of the tailings, these are not expected to adversely affect the waterway.
6.	<i>The highest environmental standards should be applied to any consent application involving the management and disposal of solid waste.</i>	
10.	<i>The duration of the solid waste consents must not exceed the lifetime of the disposal or treatment system. All consents must be considered in terms of cumulative and long-term impacts.</i>	
14.	<i>Require that solid waste disposal does not occur near groundwater bores, waterways, wāhi tapu or wāhi taonga sites.</i>	
Chapter 3.5.8 Southland Plains – Earthworks		
1.	<i>Consent applicants who are undertaking earthworks may be required to enter into Accidental Discovery Protocol and monitoring agreements with Ngāi Tahu ki Murihiku, stating that any earthworks, fencing, landscaping or other such activity has the potential to uncover</i>	WGML propose an Accidental Discovery Protocol.

Ngā Kaupapa – Policy Reference	Explanation	Comment
	<i>archaeological sites. Procedures and processes associated with such an occurrence should also be outlined.</i>	
2.	<i>Any activity involving earthworks that has the potential to modify, damage or destroy a wāhi tapu or archaeological site will require one or more of the following, pre resource consent (at the cost of the applicant):</i> <i>a. site visit;</i> <i>b. archaeological assessment (walk over/test pitting), or a full archaeological description, by an archaeologist approved by Ngāi Tahu ki Murihiku;</i> <i>c. cultural impact assessment;</i> <i>d. cultural monitoring;</i> <i>e. an authority from Historic Places Trust;</i> <i>f. recommended consent notices/conditions.</i>	Specialist archaeological advice has been sought and one non-Māori archaeological site has been identified. An Archaeological Authority has been obtained in respect of that site. Further advice will be sought from tangata whenua on potential wāhi tapu or Māori archaeological sites.
7.	<i>Where practical, indigenous vegetation that is removed or damaged as a result of earthworks activity should be recovered and returned, or replaced.</i>	Indigenous vegetation will be removed from the Waikaka Stream and Shepherd's Creek riparian margin. This will be replaced in the riparian margin of the rehabilitated stream channel if possible, or new native plants will be established.
8.	<i>Recommend the planting of indigenous species as an appropriate mitigation measure for any adverse impacts as a result of earthworks activity.</i>	The rehabilitated riparian margin will be planted with a combination of native and non-native plants, though predominantly native species will be used.
9.	<i>Any earthworks or roadworks near rivers must have appropriate measures in place to avoid contaminants (including dust, sediment run-off from stockpiles or any hazardous substance) from entering waterways that may cause contamination, discolouration, or siltation in such waterways.</i>	Earthworks will be set back from surface waterways where possible to avoid contaminants entering the water. Where this is not practicable, appropriate measures will be used to avoid or mitigate the potential for contaminants entering surface water.
Chapter 3.5.9 Southland Plains – Mining		
1.	<i>Avoid the establishment of commercial mining in areas and landscapes that are of cultural significance, particularly areas associated with wāhi tapu values.</i>	WGML are not aware of any landscapes of cultural significance or wāhi tapu values associated with the proposed project site area and will consult with tangata whenua to confirm.

Ngā Kaupapa – Policy Reference	Explanation	Comment
2.	<i>Require that the impacts on surface and groundwater are fully recognised and provided for in mining applications.</i>	The AEE provides technical assessment in relation to surface and groundwater. It is considered that these are fully recognised and provided for in the application.
3.	<i>Require that, as a condition of consent, mine development plans include provisions for:</i> <i>a. site beautification, including landscaping with native plants;</i> <i>b. restoration of mining site to pre-mining states, or, where appropriate, an improved or enhanced state;</i> <i>c. opportunities to enhance cultural values (e.g. rehabilitation of quarry floor as wetland waterfowl habitat);</i> <i>d. continued monitoring of mine site post rehabilitation (e.g. leachate).</i>	The proposal includes restoration of the mine site to pre-mining use, and beautification of the Waikaka Stream and Shepherd's Creek channel. Rehabilitation of the affected stream channels with indigenous species presents an opportunity to enhance cultural values, as does increasing the quantity and diversity of native riparian vegetation along the Waikaka Stream and Shepherd's Creek. Monitoring of the mine site post-rehabilitation is not expected to be necessary, as no chemical processing methods that may result in leachates form part of the proposal. However, WGML will adopt monitoring to confirm that restoration / rehabilitation has occurred as planned.
4.	<i>Require that the responsibility of a mining company in avoiding and managing adverse effects on a mining site extends beyond the life of the mine. Monitoring of mine sites is required for at least 5 years after mine closure, to ensure that all adverse effects associated with mine operation are addressed by the company.</i>	WGML propose continuous rehabilitation of the mine void and expect that rehabilitation could be completed around 3 years after mine closure due to the nature of the rehabilitation required. Rehabilitation of the diverted sections of stream channel will be progressive and underway as soon as mining in the diversion area is complete. All rehabilitation is anticipated to be complete prior to closure of the mine and expiry of the resource consent.
5.	<i>Promote the use of environmental contingency funds or bonds, established prior to mine development, to ensure that funds are available to address environmental issues on mine sites post mine closure.</i>	WGML acknowledges that a bond is appropriate.
6.	<i>Require that the location and design of mine waste disposal facilities is such that adverse effects on the environment are avoided.</i>	Overburden and tailings from the gold processing will be replaced in the mine pit, enabling the backfilling of the void, and with no adverse effects on the environment.
7.	<i>Avoid adverse effects on land, water, mahinga kai resources and places and biodiversity as a result of mining.</i>	WGML is not aware of any mahinga kai resources impacted by the proposal and will consult with tangata whenua to confirm. Adverse effects on land, water and biodiversity are expected to be avoided,

Ngā Kaupapa – Policy Reference	Explanation	Comment
		remedied, mitigated or offset due to the methodology and mitigation measures proposed.
8.	<i>Require that the highest environmental standards are applied to any consent application involving mining.</i>	WGML have put forward a proposal that meets high environmental standards, including complete remediation of the site, appropriate controls on site operations and ecological enhancement forming part of the rehabilitation proposal.
9.	<i>Avoid any discharge of contaminated water (e.g. stormwater) to surface or groundwater as a result of mining activity.</i>	The proposal does involve discharges from the site, however stormwater and gold processing return water will be treated via a slimes treatment plant and a three-pond settlement system, ensuring that the quality of the discharge will comply with water quality standards after reasonable mixing.
10.	<i>Require robust monitoring of any consent activity relating to mining, to detect non-compliance with consent conditions and best practice. Non-compliance must result in appropriate enforcement action to discourage further non-compliance.</i>	WGML will monitor compliance with consent conditions with the detailed methodology to be set out in an appropriate management plan once consent conditions are known. It is anticipated that the Consent Authorities will also undertake compliance monitoring.
Chapter 3.5.10 Southland Plains – General Water Policy		
2.	<i>Work with local authorities and other statutory agencies involved in freshwater management to ensure that cultural values and perspectives associated with freshwater management are reflected in statutory water plans, best practice guidelines and strategies, and in resource consent processes for activities involving water.</i>	WGML will continue to engage with tangata whenua both outside and within the resource consent process for this proposal.
3.	<i>Protect and enhance the mauri, or life supporting capacity, of freshwater resources throughout Murihiku.</i>	The proposal is considered to contribute to the protection of the mauri of freshwater over the life of the project. Some temporary adverse effects are expected to arise, however, the methods used will minimise the extent and duration of adverse effects. WGML propose to remedy any adverse effects with rehabilitation of the diverted sections of channel and ecological enhancement planting.
Chapter 3.5.11 Southland Plains – Rivers		
3.	<i>Continue to work with the Regional Councils to ensure that cultural values and perspectives associated with freshwater management are reflected in statutory water plans, best practice guidelines and</i>	WGML will continue to engage with tangata whenua both outside and within the resource consent process for this proposal.

Ngā Kaupapa – Policy Reference	Explanation	Comment
	<i>strategies, and in resource consent processes for activities involving water.</i>	
5.	<i>Adopt a precautionary approach for any activity involving a waterway where there is an absence of detailed knowledge of that waterway (ecology, flow regimes, species, etc).</i>	WGML has commissioned technical studies to provide a good degree of information on the Waikaka Stream ecology and flow regimes.
10.	<i>Ensure that all native fish species have uninhibited passage from the river to the sea at all times, through ensuring continuity of flow ki uta ki tai.</i>	The proposal will at all times provide for unimpeded fish passage in waterways and continual surface water flow.
15.	<i>Avoid the use of rivers as a receiving environment for the discharge of contaminants (e.g. industrial, residential, recreational or agricultural sources).</i>	The Waikaka Stream will receive discharges as part of this proposal, however the Applicant is providing a high-quality treatment system in order to maximise the removal of sediment from the discharge and ensure that water quality standards are met outside the reasonable mixing zone.
17.	<i>Ensure that activities in upper catchments have no adverse effect on mahinga kai, water quality and water quantity in lower catchments.</i>	Based on the assessment of water quality effects in section 5.5 of the AEE, the proposal is unlikely to have adverse effects on lower catchment values.
Chapter 3.5.12 Southland Plains – Discharge to Water		
1.	<i>Avoid the use of water as a receiving environment for the direct, or point source, discharge of contaminants. Even if the discharge is treated and therefore considered “clean”, it may still be culturally unacceptable. Generally, all discharge must first be to land. This general policy is a baseline or starting point. From this point, the Rūnanga can assess applications on a case by case basis.</i>	The proposal involves discharge to the Waikaka Stream, though discharge to land is not a practical option. Advice will be sought from tangata whenua on this matter.
2.	<i>Assess discharge to water proposals on a case by case basis, with a focus on local circumstances and finding local solutions.</i>	WGML have taken a site and project specific approach to the project design.
3.	<i>Consider any proposed discharge activity in terms of the nature of the discharge, and the sensitivity of the receiving environment.</i>	The nature of the discharge is considered appropriate in the context of the receiving environment, with reference to the assessment in section 5.6 of the AEE.
5.	<i>When assessing the alternatives to discharge to water, a range of values, including environmental, cultural and social, must be considered in addition to economic values.</i>	Alternatives to discharging to water have been considered, however the flow rate and nature of the operation (i.e., dewatering to create a dry working area) makes a discharge to land impractical.

Ngā Kaupapa – Policy Reference	Explanation	Comment
7.	<i>Any discharge activity must include a robust monitoring programme that includes regular monitoring of the discharge and the potential effects on the receiving environment.</i>	A monitoring program is proposed.
8.	<i>Require robust monitoring of discharge permits, to detect non-compliance with consent conditions. Noncompliance must result in appropriate enforcement action to discourage further non-compliance.</i>	WGML will monitor compliance with consent conditions with the detailed methodology to be set out in an appropriate management plan once consent conditions are known. It is anticipated that the Consent Authorities will also undertake compliance monitoring.
10.	<i>Ngāi Tahu ki Murihiku consider activities involving the discharge of contaminants to water a community issue. For this reason, ngā rūnanga may, where seen as appropriate, recommend that a consent application be notified.</i>	WGML have requested notification of the applications.
Chapter 3.5.13 Southland Plains – Water Quality		
2.	<i>Strive for the highest possible standard of water quality that is characteristic of a particular place/waterway, recognising principles of achievability. This means that we strive for drinking water quality in water we once drank from, contact recreation in water we once used for bathing or swimming, water quality capable of sustaining healthy mahinga kai in waters we use for providing kai.</i>	WGML have designed the proposal to result in no long-term deterioration of water quality.
3.	<i>Require cumulative effects assessments for any activity that may have adverse effects of water quality.</i>	The AEE accounts for existing water quality, as well as effects of the proposal.
4.	<i>Avoid compromising water quality as a result of water abstractions.</i>	The proposed groundwater abstraction will not adversely affect water quality.
5.	<i>Avoid the use of water as a receiving environment for the direct, or point source, discharge of contaminants. Generally, all discharge must first be to land.</i>	Alternatives to discharging to water have been considered, however the flow rate and nature of the operation (i.e., dewatering to create a dry working area) makes a discharge to land impractical.
7.	<i>When assessing the effects of an activity on water quality, where the water source is in a degraded state, the effects should be measured against the condition that the water source should be, and not the existing condition of the water source (see text box on this page).</i>	The Waikaka Stream does not meet two parameters of the existing water quality standards, however no further deterioration of those parameters is expected to occur beyond the reasonable mixing zone. Thereafter, water quality is expected to improve as WGML will rehabilitate the diverted sections of channel with plantings, other features to stabilise the bed and banks and a cobble substrate.

Ngā Kaupapa – Policy Reference	Explanation	Comment
10.	<i>Water quality definitions, categories, and standards must be determined, measured, and assessed with cultural values and indicators alongside scientific information. Such indicators and values centre on the ability of the waterway to support life, and the fitness of water for cultural uses.</i>	Scientific assessments have been provided and WGML is seeking input from tangata whenua on cultural values and indicators.
Chapter 3.5.14 Southland Plains – Water Quantity - Abstractions		
1.	<i>Adopt the precautionary principle when making decisions on water abstraction resource consent applications, with respect to the nature and extent of knowledge and understanding of the resource.</i>	WGML has commissioned technical assessment to provide information to better understand the groundwater resource.
3.	<i>Require that scientifically sound, understandable, and culturally relevant information is provided with resource consent applications for water abstractions, to allow Ngāi Tahu ki Murihiku to fully and effectively assess cultural effects.</i>	WGML will provide the technical assessment to tangata whenua and seek feedback on cultural effects.
7.	<i>Consideration of consent applications for water abstractions should have particular regard to questions of: a. how well do we understand the nature and extent of the water resource; b. how well can we monitor the amount of water abstracted; c. whether land capability (e.g. soil type, vulnerability of underlying groundwater resources) matches the land use enabled by irrigation; d. what might happen in the future (e.g. rainfall and recharge of aquifers, climate change).</i>	WGML has commissioned technical assessment to provide information to better understand the groundwater resource. WGML will monitor the rate of water abstracted on pipework immediately downstream of the pump.
10.	<i>Require catchment based cumulative effects assessments for activities involving the abstraction of water.</i>	A catchment based cumulative allocation assessment has been provided with the AEE.
16.	<i>Encourage the installation of appropriate measuring devices (e.g. water meters) on all existing and future water abstractions, to accurately measure, report, and monitor volumes of water being abstracted, and enable better management of water resources.</i>	WGML will monitor the rate of water abstracted on pipework immediately downstream of the pump.
17.	<i>Advocate for durations not exceeding 25 years on resource consents related to water abstractions.</i>	A 20-year consent duration is sought.

Ngā Kaupapa – Policy Reference	Explanation	Comment
Chapter 3.5.15 Southland Plains – Activities in the Beds and Margins of Rivers		
11.	<i>Require that placement of culverts and other flood works activities in the beds or margins of waterways is such that the passage of native fish and other stream life is not impeded.</i>	The proposal will at all times provide for unimpeded fish passage in waterways and continual surface water flow.
15.	<i>Require that that placement of culverts and other flood works activities in the beds or margins of waterways occur at times of low or no flow.</i>	The flood banks of the temporary diversion channels will be created prior to the flow being diverted down the temporary channel.
Chapter 3.5.16 Southland Plains – Mahinga Kai		
1.	<i>Work with local authorities and other statutory agencies to ensure that cultural values and perspectives associated with those species and places valued as mahinga kai are reflected in statutory water plans, best practice guidelines and strategies, and in concession and resource consent processes.</i>	WGML will continue to engage with tangata whenua both outside and within the resource consent process for this proposal.
4.	<i>Consider the actual and potential effects of proposed activities on mahinga kai places, species and activities when assessing applications for resource consent.</i>	WGML will seek advice from tangata whenua on mahinga kai values local to the project site area.
Chapter 3.5.17 Southland Plains – Ngā Pononga a Tāne a Tangaroa - Biodiversity		
1.	<i>Use planning, policy and resource consent processes to promote the protection and, where necessary, enhancement, of native biodiversity of Murihiku, specifically:</i> <i>a. enhancement and restoration of degraded areas;</i> <i>b. planting of native species to offset or mitigate adverse effects associated with land use activities;</i> <i>c. the incorporation of biodiversity objectives into development proposals;</i> <i>d. prohibiting the use of pest plant species in landscaping</i>	Native biodiversity values form part of the rehabilitation strategy for the diverted sections of the Waikaka Stream and Shepherd's Creek, enhancing the proportion of native riparian planting. Overall, native planting will contribute to the mitigation of adverse effects on the Waikaka Stream and Shepherd's Creek channel resulting from the proposed activities. The Applicant does not propose to plant any pest plant species.
4.	<i>Where practical, indigenous vegetation that is removed or damaged as a result of land use activity should be replaced.</i>	Indigenous vegetation will be removed from the Waikaka Stream and Shepherd's Creek riparian margin. This will be replaced in the rehabilitated riparian margin if possible, or new native plants will be established.

Ngā Kaupapa – Policy Reference	Explanation	Comment
6.	<i>Recommend the planting of indigenous species as an appropriate mitigation measure for any adverse impacts as a result of land use activity.</i>	Native vegetation planting forms part of the proposal.
7.	<i>The cultural, spiritual, historic and traditional association of Ngāi Tahu ki Murihiku with taonga species must be recognised and provided for within all management and/ or recovery plans associated with those species. This includes taonga species as per the Ngāi Tahu Claims Settlement Act (Appendix 4), and all other species identified as taonga by Ngāi Tahu ki Murihiku.</i>	WGML will seek cultural advice from tangata whenua on taonga species.
Chapter 3.5.19 Southland Plains – Riparian Zones		
1.	<i>Promote riparian zone establishment and management in Resource Management Act policy, planning and consent processes, as a tool to mitigate adverse effects of land use activities on streams.</i>	The proposal includes rehabilitation and ecological enhancement of affected riparian zones in the Waikaka Stream and Shepherd's Creek, with consideration for channel morphology, habitat creation and planting.
2.	<i>Prioritise the restoration of riparian areas throughout the takiwā.</i>	The proposal enables restoration of parts of the Waikaka Stream and Shepherd's Creek riparian zone through the rehabilitation strategy.
3.	<i>Promote riparian zone establishment and management as a tool to improve water quality in the waterways of Murihiku.</i>	Rehabilitation of a good quality riparian zone along the Waikaka Stream and Shepherd's Creek may assist with water quality improvements in the Waikaka Stream.
4.	<i>Require that riparian restoration or establishment, when used as a condition of consent or otherwise, uses plant species that are appropriate to the area in which they will be established.</i>	The Applicant will seek cultural and scientific advice on plant species to use in the rehabilitation of diverted sections of the Waikaka Stream and Shepherd's Creek. These will be predominantly native species but may include some non-native species.
6.	<i>Avoid stock access to riparian zones and streambeds, except when required for intermittent vegetation control.</i>	Rehabilitated sections of the Waikaka Stream and Shepherd's Creek will be fenced from stock from the riparian margin, though stock will have some access to graze the berm area.
7.	<i>Encourage fencing of streams to protect riparian vegetation, and promote healthy riparian establishment</i>	
8.	<i>Avoid or remedy any adverse effects of river works activities, culverts, bridges and stock crossings on riparian areas.</i>	Effects of earthworks on the Waikaka Stream riparian area will be remedied through planting and erosion control measures.
9.	<i>Prevent the use of willows and other exotic species in bank edge planting along waterways.</i>	The Applicant does include the use of willow in planting the riparian area of the new Diversion channel, in order to assist with rapid

Ngā Kaupapa – Policy Reference	Explanation	Comment
		stabilisation and shading of the channel, which will assist with water quality outcomes. The Applicant does not propose to use pest willow species.
10.	<i>Control and, where appropriate, eradicate willow and other noxious weeds and exotic species in riparian areas.</i>	The Applicant does not propose to plant any weed or pest plant species in the riparian areas.
Chapter 3.5.20 Southland Plains – Freshwater Fisheries		
3.	<i>Avoid stock access to riparian zones and streambeds, except when required for intermittent vegetation control.</i>	Rehabilitated sections of the Waikaka Stream and Shepherd's Creek will be fenced from stock from the riparian margin, though stock will have some access to graze the berm area.
4.	<i>Require fencing of streams to promote healthy riparian establishment and fisheries values.</i>	
5.	<i>Avoid compromising freshwater fishery values as a result of diversion, extraction, or other competing use for water, or as a result of any activity in the bed or margin of a lake or river.</i>	Freshwater fishery values are not expected to be compromised, as fish will be salvaged from work areas and fish passage will be maintained. Public access to the site will be temporarily restricted to protect people's safety, however will be restored on completion of rehabilitation.
6.	<i>Ensure that all native fish species have uninhibited passage from the river to the sea at all times, through ensuring continuity of flow ki uta ki tai.</i>	The proposal will at all times provide for unimpeded fish passage in waterways and continual surface water flow.
Chapter 3.5.21 Southland Plains – Protection of Significant Sites		
5.	<i>Avoid compromising unidentified, or unknown, sites of cultural significance as a consequence of ground disturbance associated with land use, subdivision and development.</i>	WGML propose an Accidental Discovery Protocol.