

Part I – Assessment of RMA Approvals Required

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PART I.01: RESOURCE CONSENTS SOUGHT UNDER THE FAST-TRACK APPROVALS ACT 2024

With respect to the resource consents sought under the Resource Management Act 1991 (“**RMA**”) through the fast-track application, the establishment, operation, and rehabilitation of the Macraes Phase Four Project (“**MP4**”) must be considered against the rules and regulations of the statutory planning documents set out below.

- > Operative and Proposed (Exemptions Version) of the Waitaki District Plan (“**WDP**”);
- > Operative Dunedin City District Plan (“**2GP**”);
- > Regional Plan: Water for Otago (“**Regional Water Plan**”);
- > Regional Plan: Air for Otago (“**Regional Air Plan**”);
- > Regional Plan: Waste for Otago (“**Regional Waste Plan**”);
- > Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (“**NES-F**”); and
- > Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (“**NESCS**”).

The tables in the following sections identify approvals related to district and regional resource consents under the RMA, together with those activities that are identified as permitted activities in the relevant district and regional plans. In addition, and for completeness, the tables also include an assessment of rules that are potentially relevant but have been determined to not be applicable to the Project.

To avoid doubt, OGNZL seeks all necessary resource consents for all of the activities described in Section 5 of the Application.

A summary of the consents required under each statutory planning document is provided at the end of each section. Overall, the most restrictive activity status is non-complying under the WDP and discretionary under the remaining planning documents. All activities requiring resource consent can be bundled such that the overall activity status for the respective land use consents can be treated as **non-complying**.¹

¹ It is noted that under the Act, section 104D (in respect of making decisions on non-complying activities) is not to be taken into account by the panel in making its decision.

All activities proposed as part of MP4, as described in Section 2 of **Part A** of this application are mining activities under the Operative WDP and assessed under relevant mining activity rules.

In addition to the mining activity rules, some District Wide rules apply to specific activities that form a subset of mining activities (e.g. temporary buildings, use and storage of hazardous substances, etc). In such cases, these activities are identified separately only for the purpose of assessment against such rules.

The tables below provide an analysis of the activities associated with MP4 against the relevant rules and permitted activity standards in the relevant plans of the Waitaki District. This covers the following sections of the Operative WDP:

- > Section 4 - Rural Zones
- > Section 6 - Macraes Mining Project Mineral Zone
- > Section 10 - Temporary Buildings and Temporary Activities
- > Section 12 - Transport / Car Parking Rules
- > Section 15 - Utilities
- > Section 16 - Hazardous Substances

The relevant rules with legal effect in the Exemptions Version of the Proposed WDP are contained within the Stormwater subsection under Part 2 - District Wide Matters. The Infrastructure subsection is not considered as the definition of infrastructure has the same meaning as section 2 of the RMA in the Exemptions Version of the Proposed WDP and does not include mining activities. The remaining provisions of the Proposed WDP do not have legal effect and have not been considered further.

1.1 SECTION 4 - RURAL ZONES (OPERATIVE)

Table 1-1: Activity status for activities in the Rural Scenic Zone of the Waitaki District

Activity	Rule (operative)	Compliance	Activity Status
The construction, operation, maintenance, rehabilitation and closure activities, including but not limited to: > Coronation Pit Extension; > Coronation Backfill; > Golden Point Underground Extension; > Golden Bar Pit; > Golden Bar WRS; > Silt ponds and silt control facilities; > Ancillary vegetation clearance/removal; and > Activities at the MEEA and Murphys Link including: > Fence construction and maintenance; > Vegetation clearance and planting; > Protection and enhancement of rock outcrop and tors; > Construction of rock tors of lizard habitat;	Mining Activities Discretionary activity under Rule 4.3.3.4 Mining Activities, other than Mining, or Mineral Prospecting or Exploration provided for as a Permitted or Controlled Activity. Regional Council consent may be required for any drilling, taking of water, discharges to land or water, dams and diversions.³	Mining activities (as per the above definition) are listed in Rule 4.3.3 as being a discretionary activity and are not explicitly required by that rule to meet critical zone standards.	Discretionary

³ The mining activity is not provided for under permitted or controlled activity rules.



Activity	Rule (operative)	Compliance	Activity Status
> Pest management; > Access track construction and maintenance; and > Construction, use and maintenance of site offices, equipment sheds and park up areas.			
Restoration and enhancement of a scheduled Area of Significant Nature Conservation Value / Geopreservation Site (Appendix C, Area 106, Macraes Pools), including indigenous riparian planting of 950 m of the headlands to the North Branch Waikouaiti River.	Mining Activity Discretionary activity under Rules 4.3.3(14) (Any other activity)	No – the planting/restoration is not considered to fall within a specifically permitted activity under Rule 4.3.1, and is not otherwise classified by the operative rules, it would fall within Rule 4.3.3(14), provided it complies with the Critical Zone Standards. The proposed activity is limited to indigenous planting/restoration and will comply with noise standards (4.5.1) and will not be in a Flight Protection Area (4.5.3). In addition, no trees will be planted near, or interfere with, power poles, lines or underground piping, no trees will be planted where they will shade public roads between the hours of 1000 and 1400 on the shortest day of the year or shade existing neighbouring residential unit between the hours of 0900 and 1600 on the shortest day of the year (4.5.2).	Discretionary



1.2 SECTION 6 - MACRAES MINING PROJECT MINERAL ZONE (OPERATIVE)

Table 1-2: Activity status for activities in the Macraes Mining Project Mineral Zone of the Waitaki District

Activity	Rule (operative)	Compliance	Activity Status
The construction, operation/use, maintenance, rehabilitation and closure activities, including but not limited to: > Coronation Pit Extension; > Coronation Backfill; > Innes Mills Pit Extension; > Tailings impoundment associated with Frasers TSF; > Macraes Road realignment, > Golden Bar Road reinstatement; > Golden Bar Pit; > Golden Bar WRS; and > Associated vegetation clearance/removal.	The excavation and construction of pits, pit margins, waste rock stacks and embankments, tailings impoundments and any other dams, roads and tracks associated with mining. > Discretionary activity under Rule 6.3.2.1	The MP4 activities listed in Rule 6.3.2.1 are a discretionary activity and are not explicitly required by that rule to meet critical zone standards. Note: this does not capture the mining activities not listed in Rule 6.3.2.1.	Discretionary
Construction, operation/use, maintenance, rehabilitation and closure of all remaining mining activities not listed above, including but not limited to: > GPUG;	Mining activity except for those activities associated with mining which are listed in Rule 6.3.2.1. > Permitted activity under Rule 6.3.1.7.	No – The remaining mining activity (as per the above definition and not provided for under Rule 6.3.2.1) will not meet Critical Zone Standard 6.5.2 (Vibration) at the boundary of Golden Point Historic Reserve⁴ or Critical Zone Standard 6.5.1	-



Activity	Rule (operative)	Compliance	Activity Status
> Hydraulic mining and relocation of tailings from Southern Pit TSF and MTI; > Open Pit Workshop Relocation; > Water Treatment Plant > Silt ponds and silt control facilities; > Associated vegetation clearance/removal; and > Activities at the MEEA and Cranky Jims including: > Buildings and structures > Fence construction and maintenance; > Vegetation clearance and planting; > Protection and enhancement of rock outcrop and tors; > Pest management; > Access track construction and maintenance; and > Construction, use and maintenance of site offices, equipment sheds and park up areas	6.5.1 Noise <i>Activities shall be constructed such that the following noise levels are not exceeded at the Macraes Mining Mineral Zone Boundary:</i> > <i>During daytime: 55 dB LAeq (15 min)</i> > <i>During night time: 40 dB LAeq (15 min)</i> > <i>At all times: 75 dB LAFmax</i> <i>Daytime is defined as 0700 to 2200 hours Monday to Friday & 0800 to 1700 hours Saturday. Night time is all other times and any public holiday.</i> 6.5.2 Vibration <i>Activities shall be conducted such that the following ground vibration levels measured either at the Macraes Mining Zone boundary or the boundary of the Golden Point Historic Reserve shall not exceed 10mm per second peak particular</i>	(Noise) because night-time noise levels at MMPMZ boundary exceed the night time noise limits.⁵	

⁵ Refer to AES (2026) for noise effects and TechNick (2026) for blasting effects provided in **Part B** to the application documents.

Activity	Rule (operative)	Compliance	Activity Status
Note: planting associated with revegetation and vegetation direct transfer in the MEEA is not defined as “amenity tree planting” and is captured under these rules as an activity ancillary to the mining activity.	<i>velocity measured in the frequency range 3 hertz and 12 hertz.</i>		
	Non-complying activity under Rule 6.3.3.3 Any Activity which is not listed as a discretionary activity and which does not comply with one or more of the relevant Critical Zone Standards.	The remaining mining activity is a non-complying activity.	Non-complying
Restoration and enhancement of a scheduled Area of Significant Nature Conservation Value / Geopreservation Site (Appendix C, Area 106, Macraes Pools), including indigenous riparian planting of 950 m of the headlands to the North Branch Waikouaiti River.	Mining Activity Discretionary activity under Rule 6.3.2.2 (Any other activity).	No – the planting/restoration is not considered to fall within a specifically permitted activity under Rule 6.3.1, and is not otherwise classified by the operative rules, it would fall within Rule 6.3.2.2, provided it complies with the Critical Zone Standards. The proposed activity is limited to indigenous planting/restoration. The planting is not within 15 m of an internal boundary (Rule 6.4.1). Rule 6.4.2 does not restrict indigenous planting but rather controls drainage, earthworks and vegetation clearance associated with Nature Conservation Site 106. The definition of earthworks expressly excludes the digging of holes for planting trees. The planting does not involve,	Discretionary



Activity	Rule (operative)	Compliance	Activity Status
		drainage but may not strictly exclude vegetation clearance so is captured under Rule 6.4.2 as a precautionary approach.	

1.3 SECTION 10 - TEMPORARY BUILDINGS AND TEMPORARY ACTIVITIES (OPERATIVE)

Table 1-3: Activity status for Temporary Buildings and Temporary Activities in the Waitaki District

Activity	Rule (operative)	Compliance	Activity Status
The use of temporary buildings throughout the mine.	Temporary Buildings ancillary to a building or construction project Permitted activity under Rule 10.1.1.1 provided that any such building: Does not exceed 50 m ² in gross floor area; or Remain on the site for longer than the duration of the project or twelve months, whichever is lesser.	No - Buildings will be in place for longer than 12 months.	-
	Discretionary activity under Rule 10.1.1.2	The activity exceeds the time limits specified in Rule 10.1.1.1.	Discretionary



Activity	Rule (operative)	Compliance	Activity Status
	Any Temporary Buildings and/or Temporary Activities specified as Permitted Activities, in Rule 10.1.1 Permitted Activities above, which exceed the size, scale and time limits specified in 10.1.1.1 above shall be discretionary activities.		

1.4 SECTION 12 – TRANSPORT / CAR PARKING RULES (OPERATIVE)

Table 1-4: Activity Status for Parking, Loading and Vehicle Access in the Waitaki District

Activity	Rule (operative)	Compliance	Activity Status
New parking / loading area for the proposed new workshop.	Transport / Car Parking Discretionary activity under Rule 12.1.1 The following activities shall be Discretionary Activities: Any activity which does not provide for parking, loading and vehicle access in accordance with any one or more of the following Site Development Standards (Rule 12.2)	Although the onsite carpark for the proposed new workshop will not be provided until detailed design, it is unlikely that it will comply with the Site Development Standard (f) for provision of cycle parking and standard (k) which require surfaces of parking and loading areas to be sealed (refer to Stantec (2026) - Integrated Transport Assessment). The new workshop area will be designed to allow enough space for car parking areas	Discretionary



Activity	Rule (operative)	Compliance	Activity Status
	and any emission of noise from aircraft at Omarama Airfield which is not in accordance with Rule 12.2.3 Omarama Airfield Noise Management shall be a Discretionary Activity, with the exercise of the Council's discretion being restricted to the matter(s) specified in that standard. 12.2.1 Parking and Loading [...] <i>(f) Cycle Parking</i> <i>All developments, other than residential and farming, are to provide cycle parking at a rate of 1 cycle space for every 10 car parking spaces. The cycle stands are to be laid out in accordance with Appendix G.</i> [...] <i>(k) Surface of Parking and Loading Areas</i> <i>i. The surface of all parking, loading and trade vehicle storage areas shall be constructed to meet either of the</i>	with dimensions in accordance with 12.2.1.d and so that all vehicles can turn around on the site and not need to reverse onto Macraes Road (12.2.1.g).	



Activity	Rule (operative)	Compliance	Activity Status
	<i>following standards - at the developer's discretion:</i> <i>1. Such areas shall be formed and surfaced in accordance with the requirements of the Waitaki District Standard Specification for the Construction of New Vehicle Entrances (10.5.96 and its amendments).</i> <i>Or</i> <i>2. The area shall be constructed on a well drained subgrade developed to give a CBR of not less than 12, with 150mm of compacted AP65 basecourse and 100mm of compacted M4/AP40 top course. The area shall be sealed with two coat Grade 4 / Grade 6 chip seal. All stormwater shall be controlled within the site, and led to approved outfalls. All parking areas shall be marked to define required staff and visitor parking spaces.</i> <i>ii. Rule k.i. does not apply where a site contains one residential unit and no more than two parking spaces</i>		



Activity	Rule (operative)	Compliance	Activity Status
New vehicle access points on Macraes Road	Vehicle Access Discretionary activity under Rule 12.1.1 The following activities shall be Discretionary Activities: Any activity which does not provide for parking, loading and vehicle access in accordance with any one or more of the following Site Development Standards (Rule 12.2) and any emission of noise from aircraft at Omarama Airfield which is not in accordance with Rule 12.2.3 Omarama Airfield Noise Management shall be a Discretionary Activity, with the exercise of the Council's discretion being restricted to the matter(s) specified in that standard. 12.2.2 Vehicle Access [...] <i>d) Length of Vehicle Crossings</i>	The new vehicle access points on Macraes Road will exceed Site Development Standard 12.2.2.d as they will be 24m long.⁶	Discretionary

⁶ Refer to Stantec (2026) for transport effects provided in **Part B** to the application documents.



Activity	Rule (operative)	Compliance	Activity Status
	<i>The following crossing lengths (Table 3) shall apply:</i> > Other 4m minimum and 9m maximum <i>The length of culverts and crossings shall be the actual length of channel covers or the length of the fully dropped kerb.</i>		

1.5 SECTION 15 – UTILITIES (OPERATIVE)

Table 1-5: Activity Status for Utilities in the Waitaki District

Activity	Rule (operative)	Compliance	Activity Status
Rerouting electricity lines	Lines Permitted activity under Rule 15.1.1.1 a. Lines for conveying electricity at a voltage up to and including 110KV with a capacity up to and including 100MVA per circuit; [...]	Yes - The lines and all support structures will be less than 110 KV and 100 MVA per circuit.	Permitted



Activity	Rule (operative)	Compliance	Activity Status
Transformers for hydraulic mining electricity infrastructure	Transformers and Substations Permitted activity under Rule 15.1.1.2 a. Transformers used for conveying electricity at a voltage up to and including 110KV with a capacity up to and including 100MVA, and which do not contain more than 3000 litres of oil.	Yes - The transformers will be less than 110 KV and 100 MVA per circuit.	Permitted
Underground pipelines for the conveyance of water and tailings	Underground pipe networks Permitted activity under Rule 15.1.1.7 Underground pipe networks for the conveyance and drainage of water or sewage, and any ancillary underground equipment including underground pump stations.	Underground pipelines, and any ancillary underground equipment including underground pump stations, are permitted without any conditions or performance standards.	Permitted
Aboveground pipelines for the conveyance of water and tailings	Any other utility Discretionary activity under Rule 15.1.3.6 Any other utility not specifically listed as a Permitted, Restricted	Aboveground pipelines (i.e. for hydraulic mining and the Water Treatment Plant) require resource consent as a discretionary activity.	Discretionary



Activity	Rule (operative)	Compliance	Activity Status
	Discretionary or Discretionary Activity.		
Aboveground pump stations associated with hydraulic mining systems.	Buildings used for utilities Permitted activity under Rule 15.1.1.6 Buildings used for utilities provided that the building does not exceed 10m² in gross floor area and/or 3m in height. For the purpose of Rule 15.1.1.6 a building shall not include antennas, dish antennas, overhead lines or their poles.	The hydraulic mining configuration will not be confirmed until detailed design, however, any aboveground buildings that will house pump stations associated with hydraulic mining systems are likely to exceed 10 m² GFA and may exceed 3m in height.	-
	Restricted discretionary activity under Rule 15.1.2 Buildings used for utility activities that exceed 10m² in gross floor area and/or 3m in height, provided that they comply with all of the Site Development Standards (Rule 15.2).	The hydraulic mining configuration will not be confirmed until detailed design, however, the aboveground buildings that will house pump stations associated with hydraulic mining systems will exceed the permitted activity standards but are likely to comply with the site development standards and are a restricted discretionary activity.	Restricted Discretionary



Activity	Rule (operative)	Compliance	Activity Status
		other packaged flammable liquids, SIBX, bulk oxygen, nitric acid, potassium nitrate, oxidising substances reload depot, and corrosive liquids and solids.	
	Non-complying activity under Rule 16.1.3.1 The use and/or storage of hazardous substances identified in Schedule 1 in quantities exceeding those specified in Column B of Table 1 for the relevant zone.	LPG identified in Schedule 1 used and stored at the MP4 site which exceeds the quantity specified in Table 1 Column B and is a non-complying activity.	Non-complying

1.7 PART 2 DISTRICT WIDE MATTERS – INFRASTRUCTURE AND STORMWATER (PROPOSED)

Table 1-7: Activity Status for Infrastructure and Stormwater in the Waitaki District

Activity	Rule (proposed)	Compliance	Activity Status
Establishment of new buildings and structures associated with MP4.	Permitted activity under Storm-R1 where standard STORM-S1 Stormwater management is complied with.	Connection to a stormwater system is not available and stormwater is appropriately discharged to ground on site.	Permitted



Activity	Rule (proposed)	Compliance	Activity Status
	<u>Storm-S1</u> 1. Where a connection to a stormwater management system is available, all new buildings must be provided with a connection that provides the level of service in Table 4 – Required AEP for design storms. 2. Where a connection to a stormwater management system is not available and the means of stormwater disposal is to ground, that part of the site must not be identified on the Planning Maps as being subject to the Moeraki Land Instability Overlay or inundation or be used for the disposal of wastewater.		



- > A **discretionary activity** for aboveground pipelines (for hydraulic mining and Water Treatment Plant) listed as a discretionary activity.¹⁶
- > A **restricted discretionary** for aboveground pump stations that do not comply with the GFA or height limits but are likely to comply with the site development standards.¹⁷
- > A **non-complying activity** for the use and storage of explosives and hazardous substances associated with gold processing activities that do not comply with use and storage standards in the Rural Zones and MPPMZ.¹⁸

¹⁶ WDP – Rule 15.1.3.6.

¹⁷ WDP – Rule 15.1.3.

¹⁸ WDP – Rule 16.1.3.1.

Activity	Rule	Compliance	Activity Status
		storage does not meet the permitted activity limits.	
	Restricted discretionary activity under Rule 9.3.4.4 The storage and use of hazardous substances that contravenes this performance standard is a restricted discretionary activity, except: ... [the exceptions do not apply]	Diesel storage across two tanks at the Coronation pit and Coronation North mining area exceed the permitted activity limits and are a restricted discretionary activity.	Restricted discretionary
Noise generated from the mining activity,	Noise Permitted activity under Rule 9.3.6.1.d. Land use activities and temporary activities must not exceed the following noise emission limits: b. Rural, rural residential and Ashburn Clinic zones (at notional boundary of noise sensitive activities); except in those parts of rural zones that are within 350m of the Industrial Zone: 7am – 7pm - 55 dB LAeq (15 min)	There are no nearby noise receivers (or noise sensitive activities) where the mine is located in the High County Rural Zone. ²² Therefore noise generated from the mining activity will not exceed the permitted activity noise emission limits at the notational boundary of noise sensitive activities and the noise is a permitted activity.	Permitted

²² Refer to Marshall Day (2026) provided in **Part B** to the application documents.



