



SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

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(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz

DETAILS OF SUBMITTER

Full name: ANDY ELIA

Contact person (if applicable):

Electronic address for service of submitter: ~~EE~~ andy_elia@yahoo.com

Telephone: 021 1204 999

Postal address (or alternative method of service under [section 352](#) of the Act):

57 ONSLOW ROAD, LAKE HAYES ESTATE, QUEENSTOWN 9304

This is a submission on the following resource consent application: RC No: **250077**

Applicant: **Awa Koura Mining Limited** Valuation No: **2842107654**

Location of site: **Luggate-Cromwell Road (SH 6), Cromwell**

Brief description of application: **Land use consent to extract alluvial gold in the rural resource area**

Submissions close: **4.00pm on Thursday 19 March 2026**

The specific parts of the application that my submission relates to are:

- The location of the proposed mining activity on the lower terrace adjacent to the Mata-Au Clutha River.
- The adequacy of proposed setbacks from the riverbank, marginal strip, kanuka vegetation and adjoining DOC reserve land.
- The scale and intensity of earthworks (up to 2 hectares of disturbance and processing of approximately 200m³ per hour).
- Water abstraction volumes (up to 2,520m³ per day) and associated discharge and sediment control measures.
- On-site storage of up to 10,000 litres of diesel fuel.
- Traffic generation and access arrangements via State Highway 6.
- Proposed staging, rehabilitation methodology, and long-term landform reinstatement.

This submission is:

I oppose the application.

The proposal represents a significant scale of earthworks and industrial activity within a sensitive river corridor environment. The proximity of excavation to the Mata-Au Clutha River raises concerns regarding sediment mobilisation, potential contamination, and adverse effects on water quality, aquatic ecosystems, and downstream users.

The proposed water take of up to 2,520m³ per day is substantial and may have cumulative effects on river hydrology, particularly during low-flow periods. Insufficient detail has been provided to demonstrate that adverse effects on river values will be avoided, remedied, or mitigated to an acceptable standard.

The storage of large volumes of diesel fuel, even within bunded tanks, presents a residual risk of spill events in close proximity to a nationally significant water body.

The proposal will also generate adverse amenity effects including noise, dust, and increased heavy vehicle movements on State Highway 6. These effects are inconsistent with maintaining rural character and amenity values.

While progressive rehabilitation is proposed, there is insufficient certainty that the original landform, ecological function, and landscape character can be fully reinstated. Contouring to “match existing landforms as closely as possible” lacks measurable performance standards and does not guarantee restoration of pre-existing environmental values.

In my view, the applicant has not demonstrated that the adverse effects will be avoided, remedied, or mitigated in accordance with the purpose and principles of the Resource Management Act 1991, including sustainable management of natural and physical resources and the protection of outstanding natural features and water bodies.

I/We seek the following decision from the consent authority:

That consent be declined in its entirety.

In the alternative, if consent is granted, I seek the imposition of stringent conditions including (but not limited to):

- Increased setback distances from the Mata-Au Clutha River and reserve boundaries.
- Independent hydrological and water quality monitoring with publicly reportable results.
- Strict limits on water abstraction volumes, particularly during low-flow periods.
- Comprehensive sediment control and spill response requirements.
- Restricted hours of operation and limits on heavy vehicle movements.
- A substantial rehabilitation bond sufficient to ensure full site restoration to an agreed performance standard.
- Post-closure ecological monitoring for a defined period.

The specific parts of the application that my submission relates to are:

(give details, attach on separate page if necessary)

~~THE PROPOSED LOCATION OF THE MINE ON THE LOWER TERRACE NEAR THE MATA AU~~

SEPARATE PAGE AS ATTACHED

This submission is: (attach on separate page if necessary)

Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

SEPARATE PAGE AS ATTACHED

I/We seek the following decision from the consent authority:

(give precise details, including the general nature of any conditions sought)

SEPARATE PAGE AS ATTACHED

I/We support/oppose/ neither support or oppose the application (circle one)

I/We wish/do not wish/ to be heard in support of this submission (circle one)

I/We am /am not/ a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (circle one)

*I/We am/ am not (circle one) directly affected by an effect of the subject matter of the submission that:

- adversely affects the environment; and
- does not relate to trade competition or the effects of trade competition.

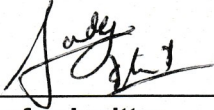
***Delete this paragraph if you are not a trade competitor.**

*I/We will consider presenting a joint case if others make a similar submission.

***Delete this paragraph if not applicable.**

I/We request* do not request (circle one), pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

***See note 4 below as you may incur costs relating to this request.**



Signature of submitter

(or person authorised to sign on behalf of submitter)

22/02/2026

Date

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Notes to submitter

1. If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).
2. The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.
3. You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.
4. If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.
5. If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you will be liable to meet the additional costs of the hearings commissioner or commissioners, compared to our hearing panel. Typically, these costs range from \$3,000 - \$10,000.
6. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.