

Submission on Notified Resource Consent PL260335505



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Submission on Notified Resource Consent

Reference	PL260335505	Submitted	16 Mar 2026 09:09
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Notified Submission

SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

(Form 13)

Section 95A (public) Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340

This is a submission on the following resource consent application:

Resource Consent Number	RC250077
Valuation Number	2842107654
Applicant	Awa Koura Mining Limited
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 19th March 2026

Writing a submission

The following will be required during this process:

- Your full name and address, telephone number and email address
- Whether you support or oppose the application for resource consent
- The reason for your submission
- The decision you wish the Council to make, including any conditions sought
- Whether you wish to be heard.

Important information so you don't lose your data

If you wish to take some time completing this form, we strongly recommend that you **create a [login](#) and log in to your account prior to starting to complete the form**. This gives you the ability to save a draft and return to it later.

If you are a club or organisation, please use an email that is associated with the club rather than your work or personal email.

Logging in before starting to enter information into the form also means you won't lose your information if the form times out, or if you accidentally navigate away from the screen you're working on.

You cannot save your information and return to it later unless you log in before you start the form.

Regardless whether you are logged in, once you have completed and submitted the form, you will receive a copy of your submission to the email address you specify in the form.

Either go to our [Online Services](#) page to create an account (or log in if you already have an account) or continue below to start without logging in.

Privacy

The information you provide is official information and is used to help process your application. The information is held and used in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 2020. This means that your information may be disclosed to other people who request it in accordance with the terms of these Acts. Under the Privacy Act 2020 you have the right to see and correct any personal information that Council may hold about you.

Declaration

By continuing with this application you certify that: The Yes
information you provide is true and correct to the best
of your knowledge.

Notified Submission

Notes to submitter

1. If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on

Page 2 of 5

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.

2. 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.
3. 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.
4. 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.
5. 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.

In lodging this submission, your submission, including contact details, become public information and will be available for anyone to view.

DETAILS OF SUBMITTER

Full name	Simon Stebbings
Contact person (if applicable)	
Electronic address for service of submitter:	simon.stebbing.nz@gmail.com
Phone number - day time	027 432 1744
Postal address (or alternative method of service under section 352 of the Act):	459 Luggate-Tarras Road, Sandy Point, Luggate 9383

Your Application

Please select one regarding the application	I oppose
Do you wish to be heard in support of this submission?	Yes - I wish to be heard
Are you a trade competitor for the purposes of section 308B of the Resource Management Act 1991?	I am not
I would consider presenting a joint case if others make a similar submission	Yes

Details of submission

The specific parts of the application that my submission relates to are:	1. Proposed economic benefits of the mining activity 2. Noise Assessments 3. Water Extraction from the Clutha/Mata-Au
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The submission - include:

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

4. Effects on et adjacent DOC Scenic Reserves
5. Consultation with community and stakeholders
6. Post extraction rehabilitation of the environment

I oppose the application as presented. I attach a document that details the following concerns within the framework of the RMA, Conservation Act and the Council District Plan. These are:

1. Exaggerated economic benefit
2. Inadequate noise assessment- specifically as it relates to my property
3. Potential for excessive water extraction from the Clutha/Mata-Au and lack of easement across DOC land
4. Potential adverse effect on adjacent DOC reserves at Autaia and Sandy Point
5. Lack of Community consultation
6. Lack of a plan for rehabilitation and enhancement of the environment post extraction

[Submission relating to 250077 Awa Koura Mining Stebbings .pdf](#) (88 kb)

[250077 b Submission Form Simon Stebbings .pdf](#) (360 kb)

I seek the following decision from the consent authority.

Give precise details, including the general nature of any conditions sought

1. Under section 5 of the Resource Management Act, sustainable management requires balancing economic benefits with protection of environmental and community values. In this case the economic contribution appears limited while the potential adverse effects on landscape values and visitor experience may be significant.
2. I request that the Council require independent noise testing extending to my property before determining the acceptability of the application, in accordance with the Resource Management Act (RMA) sections 16 and 17, and the Rural District Plan. That the hours of work be specified and that a requirement that not only weekends but also public holidays should not be worked.
3. The Council should consider how the volume of water extracted from the Clutha/Mat-Au would be monitored and the effects this may have on freshwater ecology, including invertebrates and fish species, particularly with respect to Sections 14 and 30 of the RMA. The absence of a clear water balance and hydrological assessment prevents a full understanding of the effects on the river and should be required.
4. A thorough assessment of the impacts on the adjacent DOC reserves including potential impacts on flora and fauna within the reserve, including: noise disturbance, lighting, habitat disruption, and dust and spray from the plant equipment. Review of the likely water extraction pipes from the Clutha/Mata-Au pipes which will need to traverse the reserves causing potential damage/erosion to the delicate gravels at the river margin. The application does not demonstrate that the applicant has legal authority to occupy or install infrastructure across Department of Conservation land. Under the

Conservation Act 1987, section 17Q, a concession would be needed.

5. Post mining restitution and enhancement of the area as detailed in my attached PDF submission

Select below - 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 (second tab) as you may incur costs relating to this request."

Any other comments?

I do not request
Please see my attached submission PDF

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.

Yes

Please sign (click on the words CAPTURE)

S. M. Stelings

Date signed:

16/03/2026

SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

(Form 13)

Section 95A Resource Management Act 1991

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To: The Chief Executive
Central Otago District Council
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DETAILS OF SUBMITTER

Full name: Simon Stebbings

Contact person (if applicable):

Electronic address for service of submitter: simon.stebbing@nz@gmail.com

Telephone: 027 432 1744

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

459 Luggate -Tarras Road

Sandy point, Luggate 9383

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:
(give details, attach on separate page if necessary)

Economic benefits	Effects on adjacent DOC Scenic Reserves
Noise Assessments	Consultation with the Commiunity and stakeholders
Water Extraction from Clutha River/Mata-Au	Post extraction habitat rehabilitation

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.

I oppose the application on the basis of: Exaggerated economic benefits, inadequate noise assessments

Excessive water extraction from the Clutha/Mata-Au, and lack of legal easement across DOC land

Potential Adverse Effects on Adjacent Department of Conservation (DOC) reserves; Sandy Point and Autaia reserves

Lack of consultation and very poor rehabilitation proposal post extraction

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

I attach a document which details these concerns within the framework of the RMA, Conservation act and district plan.

~~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.~~

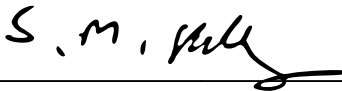
***Delete this paragraph if you are not a trade competitor.**

~~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)

15/3/2026

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

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 - 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.

This submission relates to the resource consent application: RC250077 - Awa Koura Mining at Sandy Point, Queensbury, for the proposed alluvial gold mining activity.

Submitter: Dr Simon Stebbings : 459, Luggate-Tarras Road, Sandy Point 9383

I, Simon Stebbings, oppose the above application on the basis of concerns related to the applicants 'Assessment of Environmental Effects' which do not adequately address several potential adverse environmental effects of the proposed alluvial mining activity, including; adverse noise impacts, adverse ecological effects on the adjacent Department of Conservation (DOC) reserves at Sandy Point and Autaia scenic reserves, water extraction from the Clutha River / Mata-Au, and the limited economic benefit relative to the scale of environmental disturbance.

These concerns are detailed in the points below.

1. Exaggerated Economic Benefits

The application appears to overstate the economic benefits relative to the scale of the activity.

The application emphasises economic benefits associated with the proposed gold mining activity. However, these benefits appear disproportionate to the scale of the proposal, which indicates employment for approximately four individuals, and states this will enhance the local economy schools and medical facilities (the nearest of which are in Cromwell and Wanaka).

This must be weighed against the potential adverse effects on an area with significant visitor activity associated with tourism and recreation. The Council itself previously highlighted this issue in its assessment dated 2 May 2025.

Under section 5 of the Resource Management Act, sustainable management requires balancing economic benefits with protection of environmental and community values. In this case the economic contribution appears limited while the potential adverse effects on landscape values and visitor experience may be significant.

2. Inadequate Noise Assessment

Noise in district plans is typically assessed to the boundary of neighbouring properties, not just near the proposed activity.

The noise assessment provided by Marshall Day in the application, indicates elevated sound levels associated with the proposed activity, up to 110dB, from heavy plant machinery. In their map of sound impact (C2 Scenario 2 and C3 Scenario 3), acoustic impacts appear to extend beyond the map, which would be likely to include the submitter's property. However, no monitoring was undertaken on my property, and none are shown to my property boundary. Without monitoring at this location the impact I can expect from the mining activity cannot be determined.

It is, therefore, requested that the Council require independent noise testing extending to my property before determining the acceptability of the application. This is in accordance with the Resource Management Act (RMA) sections 16 and 17, and the Rural District Plan.

Furthermore, the application states hours of operation for the mine will not exceed 10 hours per day and the mine will not operate at weekends, because noise is identified as likely to exceed nuisance levels. The plan is not specific about operating hours, for instance, as described the mine could operate until 9pm in the evening or mining start at 5am. Neither of these would be acceptable. The application does not specifically mention public holidays, and it would not be appropriate for the mine to operate on these days, for example Christmas Day. These hours should be specified.

3. Excessive Water Extraction from the Clutha River/Mata-Au

The Clutha River / Mata-Au has significant taonga for both Māori and tauīwi.

The proposal appears to involve the potential extraction of significant volumes of water from Clutha River / Mata-Au. It seems that the proposal significantly underplays this aspect of the proposal. The proposal suggest that water will be stored in ponds on the property, below the floating gravel wash plant machinery. By their own estimate this will use 70 L/s of water and 2479m³ water per day. They state that this water will be recycled through the pond. The application describes water losses through “evaporation”, which may necessitate topping up water levels in the ponds from the Clutha/Mata-Au. It seems highly unlikely that there will be significant evaporation under their plant. However, as reported the ponds will be in gravel and there will be significant seepage into the soil from this highly porous substrate, as anyone with a knowledge of the soils in the area will appreciate. This statement, therefore, appears technically inaccurate given the geological conditions of the site. In order to replace the loss of water from the ponds, there is a high likelihood that significant ongoing water extraction from the Clutha /Mat-Au would be required.

The application omits sufficient detail regarding the quantity of water required for mining operations and the potential cumulative effects of water abstraction from the Clutha River / Mata-Au. The absence of a clear water balance and hydrological assessment prevents a full understanding of the effects on the river. Furthermore, the proposal seems to suggest that it would be the operators responsibility to provide data on the quantity of water extracted.

The Council should consider how the volume of water extracted would be monitored and the effects this may have on freshwater ecology, including invertebrates and fish species, particularly with respect to Sections 14 and 30 of the RMA.

3. Adverse Effects on Adjacent Department of Conservation (DOC) reserves; Sandy Point and Autaia reserves

The DOC administered Sandy Point and Autaia reserves are between 10m and 75m from the boundary of the proposed mine site.

The region surrounding Sandy Point has undergone significant rewilding since the Crown Pastoral Land Tenure review (PO350) in 2002. This has resulted in the return of kanuka to

the slopes of the Grandview range and an increase in indigenous fauna. The area is known to be a habitat for invertebrates, especially moths and weta, and for skinks; *Oligosoma maccanni* and the endangered Otago Grand skink (*Oligosoma otagense*).

Under section 6(c) of the Resource Management Act, the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna is a matter of national importance.

The applicants landscape assessment is concerning in its superficial nature, for instance it refers to the 'Unnamed High Country between the Clutha and the Lindis', which is the Grandview range and part of the DOC high country reserve .

The application does not adequately assess potential impacts on flora and fauna within the reserve, including: noise disturbance, lighting, habitat disruption, and dust and spray from the plant equipment.

Furthermore, if water is to be taken from the Clutha/Mata-Au pipes will need to traverse the reserves causing potential damage/erosion to the delicate gravels at the river margin. The application does not demonstrate that the applicant has legal authority to occupy or install infrastructure across Department of Conservation land. Under the Conservation Act 1987, section 17Q, a concession would be needed. Which would require an environmental assessment and consultation with iwi, to obtain an easement

As such the applicants landscape assessment omits many key area in regard to the ecology and conservation of this important reserve area, and there is uncertainty regarding the potential impacts on the reserve from the proposed water extraction and whether this will traverse and impact the DOC reserve.

5. Lack of Consultation (DOC, Iwi, and the local community)

The application appears to have been prepared with minimal engagement with key stakeholders including the Department of Conservation, tangata whenua, local residents and the nearby community of Luggate. Given the proximity of the activity to conservation land and the Clutha River / Mata-Au, consultation with these parties would be expected as part of a robust assessment of environmental effects. This is particularly relevant when considering remediation following the alluvial mining, should this go ahead, as well as potential impacts on the community and the rural environment during the period of extraction.

6. Lack of Rehabilitation and Community Benefit

The proposal provides limited information regarding long-term rehabilitation of the site following the cessation of mining activities.

The application indicates that the land will simply be returned to a neutral level, rather than being restored or enhanced for community or ecological benefit.

Given the proximity of the site to the river corridor and wildlife reserve, consideration should be given to post-mining outcomes such as improved public access, ecological restoration, and integration with adjacent recreational areas.

The District Plan stresses the importance of preserving and enhancing local landscapes for the benefit of the community and visitors. It states that quarrying and mining activities such as this proposal, should put in place post-extraction rehabilitation enhancing the area and increasing public access and recreation along rivers. The District Plan exists specifically to manage development effects on natural and community environments.

In terms of restitution, a community fund used for environmental purposes would be appropriate. It is suggested that 0.5% of the market value of the gold extracted by Cold Gold could be placed in such a community fund, under supervision of the Council which could see fit to test which community group is best placed to administer the funds.

Furthermore, as access to the Clutha/Mata-Au is very limited along this part of the river, when mining is complete and prior to subdivision, road access could be gifted in perpetuity, to allow the public to visit the beautiful Autaia reserve area, which currently has no road access from the State Highway. The community fund could be used to rewild the area and with additional native planting to encourage the return of native invertebrates and birds. Seating could be provided. This fund could also be used for plantings across the river at the Sandy Point lookout and to improve rabbit proof fencing at that site.

Closing Statement

For the reasons outlined above, the application does not adequately demonstrate that adverse environmental effects will be avoided, remedied or mitigated as required under the Resource Management Act.

The submitter therefore requests that the application be declined or, alternatively, that further independent assessments be required addressing noise impacts, ecological effects, water use and rehabilitation of the site.