

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
PO Box 122
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DETAILS OF SUBMITTER

Full name: Richard and Caroline Bell

Contact person (if applicable):

Richard Bell

Electronic address for service of submitter: richard@shuriken.co.nz

Telephone: 021-527744

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

738 Luggate-Tarras Road, 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)

Please see attached pages

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.

Please see attached pages

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

A complete and utter rejection of this proposal

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:~~

- ~~(a) adversely affects the environment; and~~
- ~~(b) 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)

18th March 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.

Bell - Submission Addendum

(Attached Pages)

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

We are opposed to all the aspects of this proposal - noise effects, dust effects, visual effects, length of time per day requested, length of project and the direct loss in the value of our property and land purely to give private gains to other individuals.

By the submitter's own calculation (Mike Moore's Landscape report Page 16) our house is 280m from the mining when it will be closest to us and for a large part of the period proposed we will be within 280-600m from the mine. We are also extremely aware of the wind that blows frequently from the N/NW, directly towards us from large parts of the proposed area. Both my wife and I work at home, my wife as Psychiatrist conducting highly personal interviews with people. Noise was a huge factor in our choice of home and a "Rural Lifestyle" may include occasional tractor work etc, but 3 years of 10 hours a day of heavy industrial noise is completely unacceptable.

The applicant's own modelling, which is ONLY modelling and not based on any real world tests, has obviously been biased to minimise the reality of the situation. Note the choice of the Scenario 2 Centre and Scenario 3 North being chosen to be far father away from 738 Luggate-Tarras Road than they will be for a large part of the proposed time. Marshall Report: Scenario 2 Centre Downwind is chosen because it is about 800m away (resulting audio level 46db) and then Scenario 3 North Upwind and about 500m away (resulting audio level 48db) are chosen to deliberately hide the effect that they will actually be 280m away from us at the middle point of the proposed operation. If you move the "heat map" and slide it over the parts of the proposed area nearest us you will see that we are super borderline 55db+, even before we allow for the margin of error of modelling, very frequent wind effects and the fact that these machines will be running together and spread out and not individually.

In addition the report itself states (Marshall Day Acoustics Report P15):

"Special Audio Characteristics - Distinctive characteristics of a sound that make it more likely to cause annoyance or disturbance. A penalty of up to 5 decibels can be applied when assessing sounds with SAC. Examples are tonality – a hum or a whine and impulsiveness – bangs or thumps.

Surely that sounds like mining equipment? For some reason they explicitly state that they have not added any SAC penalty! Obviously to keep the levels down in their calculations.

The situation would be borderline unsafe at best and is totally unacceptable in the real world. Let alone should we wish to venture onto land WE OWN down towards the river - which brings us even closer to the noise. This land has involved extensive work and effort to build a private frisbee golf course, used by us and others through the week. No one will be able to venture there if a mining operation is 280m away - as the noise will be unbearable and potentially unsafe.

Council permitted the building of our house as a "rural lifestyle" block. We have been there a long time and and now we find ourselves being threatened with a full scale "industrial lifestyle". This is not acceptable.

When we allow for modelling inaccuracies and a real world scenario, with real atmospheric effects, we will be exposed to noise levels that are not only above and beyond safe, but also their longevity and nature will be unsettling, disruptive and unfair. Let alone the effect this will have on my wife's and my work. This proposal cannot proceed without full and thorough testing, on location, and with our choice of engineer present at the same time as Marshall's biased engineers. Council may then be able to make a proper estimate of the situation than the report they have in their hands currently.

Most importantly we would need written, concise and clear guidance from council as to how things would progress should consent be broken. The result of breaches would need “teeth” as well - specific ways that remedies would be applied - including shutting the operation down. We have contacted an environmental noise specialist to monitor our property in the sad case this proposal goes ahead. How will that company be able to supply proof of breach of consent to council? How will council react to breach of consent? How many times will breaches be allowed? When the threshold has been crossed will the mine be shut down? For how long? Will the 3 year clock still be ticking whilst the operation tries to sort itself out or will they get an extension? We are terrified of a loop where we supply breach of consent evidence and it gets fobbed off as “temporary”/“only x number of times”/etc etc and the breaches will essentially be permitted ad infinitum. Absolutely clear, 100% enforceable guidelines must be supplied and monitored and held to by Council with an agreed ability for us to supply approved and admissible data to Council.

The dust this operation will create will be a lot harder to measure but, as mentioned above, the wind will carry large amounts of this over our and other properties. On page 87 of the application (point 49) it states “Mr Trotter.... considers that the soils are extremely fragile and sensitive to wind blow.” Please see the supplied video evidence of a SINGLE truck driving on the road created on the property. (The video was filmed by our neighbours on the afternoon of March 16th 2026 and we are submitting it on our behalf and also on the behalf of ALL the properties on the Eastern side of the river):

<https://www.dropbox.com/scl/fi/wa49h1h1o84mw94kc66bj/250077-WhatsApp-Video-2026-03-17-at-15.19.51-1.mp4?rlkey=k9bit1j40isn0s9j2xz82jtom&dl=0>

<https://www.dropbox.com/scl/fi/uet6kz0n8ne4pwjqshci1/250077-WhatsApp-Video-2026-03-17-at-15.19.51-2.mp4?rlkey=0zno9h2fud470xr4chxcxs8ek&dl=0>

The reality of 5 excavators, 2 dump trucks and a bulldozer operating together on newly broken soil in our regular summer winds for 10 hours a day, 5 days a week..... it is hard to comprehend! This is also not acceptable and council must be able to measure, record and enforce the dust in some way. Council also needs to propose, police and enforce (to the same standards as the noise monitoring) what happens when the dust is deemed excessive.

The visual aspect of this proposal has been massively understated: “Very low” seems to be the favourite word of Mr Mike Moore, when to any normal person a large portion of land - which will look barren as it regrows, following behind a bare 2 ha mining site and all the ancillary machinery etc, will look appalling from any overlooking house or from the DOC viewpoint at Sandy Point. (People regularly park at and use the Sandy Point car park for recreational walks and views over the landscape). Only a highly partisan person could call what is essentially an open cast mine at the forefront of their view “minor”. Moore’s entire report is his “opinion”... and we have plenty of “opinions” that are 100% different.

In addition Moore’s report (page 18) shows that the council has a policy “To manage the effects of land use activities and subdivision to ensure that adverse effects on the open space, landscape, natural character and amenity values of the rural environment are avoided, remedied or mitigated”. He then goes to say that “In the long term any adverse effects of the activity on landscape values will be no greater than very low”. Council’s own policy does not say “very low” it says “avoided, remedied and mitigated”. Again we have a highly selective and subjective report saying that everything will be ok when it absolutely clearly will not be so.

This all combines to create a distinct (and measurable) drop in value for our property. Indeed this has already happened as word of this project is in the community at large. The closeness of the mining and the various issues it will create, however “low level” will reduce the value of our home. This reduction is for no other reason than creating some phantom GDP and profit for others, most of whom live outside the region. If those losses were included in the calculations of that report the figures would look very different indeed. (And please do look at the unsubstantiated and mass assumptions made in the report by Benje Patterson - prettified by sharp graphics but with absolutely no basis and explanation of how such figures were cooked up). We are already trapped

in this situation, unless the mine is cancelled the value drop is now locked in. Many years go Council gave permission for us to live in a rural lifestyle area. This mine - in absolutely no way at all - could be considered "rural lifestyle". It is full scale INDUSTRIAL. Compensating for this loss in value to all the affected parties makes the profits from this mine zero, at best. Why should we, who were there well before the mine was even thought about, be the ones to suffer?

The time frame this operation has applied for is 3 years. Will council monitor that and will they strictly enforce that. I have pointed out already that they WILL break the noise limits. I believe they will break whatever dust limits council manages to define and put in place. What if they break heritage covenants? As mentioned before what happens to the "clock" then? Is it paused? Does it auto extend? We can see this project easily running for much longer than 3 years as various consent breaches are allowed to be fixed as they go.

Include:

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

We 100% oppose this application. For the reasons stated above.

If the proposal was in any way allowed to progress:

There needs to be real world testing and independent analysis to happen first with regards to noise and dust. A better, less partisan analysis done on the economic benefits of this mine is also needed (especially showing if Gold prices slump and the applicant's went out of business - what happens then?)

Most importantly there would also need to be specific, measurable and enforceable restrictions placed on the operation. These to be monitored and policed by Council with allowance for approved residents data to be submitted. Specific and enforceable penalties need to be in place for when breaches occur, with the **absolute guarantee** that Council will close the operation and force complete restoration of the land if needed.

The duration of hours per day and overall length of time required needs to be adjusted downwards massively.

18th March 2026