



19 September 2016

West Coast Regional Council
388 Main South Road
Greymouth 7805

Via e-mail: plan@wcrc.govt.nz

Submission – Proposed Plan Change 1 – Minerals West Coast

Name: Phil McKinnel
Organisation: Minerals West Coast Trust
Address: PO Box 77
Greymouth 7840
E-mail: phil@mwc.org.nz
Phone: 03 768 7365
Mobile: 021 849 978

Preferred method of contact: E-mail.

As per Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement that:

- Adversely affects the environment
- Does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

- I **could not** gain an advantage in trade competition through this submission; or
- I **could** gain an advantage in trade competition through this submission. *If you have ticked this box, please select one of the following:*
- I **am** directly affected by an effect of the subject matter of the submission.
- I **am not** directly affected by an effect of the subject matter of the submission.

Signature: 
[Signature of person making submission, or authorised to sign on behalf of person making the submission]

Date: 16 September 2016

(A signature is not required if you make your submission by electronic means)

PART C: Request to be Heard

- I **do not** wish to be heard in support of my submission; or
- I **do** wish to be heard in support of my submission; and if so,
- I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any Hearing.

Provisions to which submission relates

- MAIP003
- MAIP004
- HOKP086
- HOKP009
- PUNP001

Submission

Minerals West Coast supports the proposed removal of areas of the following wetland areas:

- HOKP009
- PUNP001

Minerals also supports the proposed removal of areas of the following wetlands but also requests that further areas are removed due to previous modification and development of these areas.

- MAIP003
- MAIP004
- MAIP006
- HOKP086

The wetland identified above cover existing minerals permits that allow the holder to either explore or mine for minerals and coal. The incorrect classification or identification of wetlands in these areas will result in increased costs associated with the exploration and development of the mineral and coal resources in these areas.

In some cases this classification has the potential to adversely affect existing mining activities, including current and future investment and employment opportunities.

In assessing the current wetland maps and the associated areas designated for amendment, it appears that there is no consistent approach taken to identification or classification of wetland areas.

In some instances, areas of previous track or road construction and previous land development has been removed where in others this has not.

As a general comment, Minerals West Coast holds concerns regarding the process for identification of the wetlands and the subsequent this process has had on landowners across the region. The inclusion of wetland areas without appropriate assessment has resulted in additional costs being imposed on exploration and mining activities without any information being available to either the land owner or permit holder.

Amendments Sought

The following amendments are sought:

- Removal from MAIP003 all areas of previous modification including Perseverance Road, previous tracking and roading and areas of previous modification associated with logging activities within Minerals Exploration Permit EP60154
- Removal of MAIP006 from within Minerals Mining Permit MP41646 given the level of previous modification within this area as evident on the attached aerial photograph.
- Removal of MAIP004 from within Minerals Mining Permit 52160 given the level of previous modification within this area.
- An increase in the area to be removed from HOKP086 to more fully capture land that has been developed prior to the notification of the Land and Water Plan.
- A more thorough assessment of the values associated with the wetlands identified above and this information provided to the land owners or persons holding interests over the land in question, including minerals permit holders, prior to confirmation or removal or addition to these areas.

The maps attached to this submission show the areas initially identified by the submitter as being consistent with other areas that have been removed from the current wetland areas. Given the significance of the mineral potential underlying these areas a fuller assessment of the identified wetland areas should be undertaken.