

Gold and Green Resources Limited

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2 September 2016

Westland District Council
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Attn: Fiona Scadden

Dear Fiona

Resource Consent 160041 : Phoenix Mining Limited MP 52365 Stafford

Further to your letter requesting further information please find below the information addressing the points raised in the request.

1. Indigenous Vegetation Clearance

The Westland District Plan identifies the criteria used to identify any areas that may be considered significant where development is proposed to establish if they require protection. Below the criteria raised under Section 4.9.D of the plan are addressed as they apply to the proposed clearance of vegetation in association with the extension of alluvial gold mining on Lot 3 DP 382658 within MP 52365.

i) Intactness

Lot 3 DP382658 consists largely of land that has already been cleared of indigenous vegetation and developed as pasture following earlier mining and land development. There remain areas of indigenous bush that will not be touched during mining shown primarily on the steep faces of the outlier of marine sediments capped by glacial outwash located west of the Stafford township and Waimea Creek but also on the terrace face south of the area to be cleared. The area where it is proposed to clear the vegetation during mining is shown on the plan that accompanied the original application. The southern corner boundary of the block adjoins Part Reserve 1953 which contains indigenous forest managed as stewardship land by the Department of Conservation. The area to be cleared is on the western boundary of the Waimea Forest which contains a patchwork of indigenous and pine forest covering the low terrace land to the east.

All forest in this area has been heavily modified by earlier mining and logging and there are exotic pines planted along the front edge of the terrace south east of the area to be cleared. Gorse has become established on the margins of the indigenous bush. On the southwest border in the neighbouring reserve area a pakihī has developed often indicative of heavy earlier logging or modification by fire. Given that upwards of 3000 people lived in Stafford in the late 1860's carrying out gold mining, extensive

clearing of the bush at that time is not unexpected.

ii) **Representativeness**

The indigenous forest present is a block of regenerating mixed podocarp hardwood forest containing rimu, miro, rata, kamahi, manuka and tree ferns. In keeping with the rest of the Waimea Forest it has developed on gravels that have been deposited on the underlying basal sequence Eight Mile Formation sandstones and siltstones. In the area to be cleared the sediments consist of Loopline Formation glacial outwash gravels and interglacial marine sediment of the Karoro Formation. Throughout the Waimea Forest all large trees have been logged in earlier times.

iii) **Distinctiveness**

The forest cover present is typical of that developed on lowland glacial terraces and found widely in north Westland. With the high rainfall thin gley soils have developed on the glacial sediments which support the growth of podocarp hardwood forest.

iv) **Protected Status**

The land does not have any protected or covenanted status and the neighbouring land is managed as part of the Big Dam Hill Conservation Area, classified as stewardship land by the Department of Conservation, the lowest level of protection for the land that it manages.

v) **Connectivity**

The area to be cleared shares a common boundary with the indigenous forest in Part Reserve 1953 which is not currently fenced allowing the free movement of animals between the two blocks. In effect the area adds an additional 3 hectare block to the western margin to the 1208 hectares of indigenous forest in the neighbouring Big Dam Hill Conservation Area.

vi) **Threat**

There are no creeks running through the area to be cleared so that there is no threat to species like the shortjaw kokupu (*galaxias postvectis*) a threatened species present elsewhere within the Waimea Forest. No threatened bird species are known to be present in the area. The principal external threat to the forested area comes largely from introduced species that browse on the vegetation including possums, pigs and deer all of which are present in the Waimea Forest.

vii) **Migratory Species**

Migratory birds will feed on the fruits and seeds of the trees and shrubs present on a seasonal basis.

viii) Scientific or other Cultural Value

The area of proposed clearance has no special designation or reference. Like much of the West Coast there has been historic logging and mining within the block but the principal site of historic significance within Lot 3 DP 382658 is the Wheel of Fortune mine site which lies to northwest and has been subject to an archaeological appraisal for which the Historic Places Trust Authority issued an authority to damage/modify part of it during mining activities. That site is not being affected by this application with the bush surrounding it remaining in place. The scenic amenity value of the area to be cleared is limited because although located on a higher terrace it is largely screened from the road by topography and other indigenous vegetation cover.

Conclusion

To meet the criteria of being a significant area of indigenous vegetation and habitat a number of criteria must be met. While 3 hectares is not a large area it has been modified by earlier human activity particularly logging and mining and adds less than 0.3% to the neighbouring forest managed by the Department of Conservation. The area would not be recognized as the best representative of an association of the species within the area but is typical of what is found widely within the Waimea Forest. The land is not protected and does not contain any cultural or scientific sites. The location on the margin of the forest adjacent to land already developed as pasture lowers its importance to the overall forest, however it still plays a role in supporting species that are threatened within the larger forest.

Carrying out a survey for the Office of Treaty Settlements of all of the then Timberlands managed forests (since divided between the Department of Conservation and Ngai Tahu Forest Estates Limited) including the neighbouring Waimea Forest, a committee including specialists and DOC staff assessed the area against three main criteria: representativeness, ecological/landscape context and habitat for threatened species. These criteria are similar to those used by the Westland District Council and their conclusion for the Waimea Forest was that it was Low Value Indigenous Forest and this description does describe the area it is proposed to clear.

Reference

1997 Inventory and Assessment of Crown- Owned Indigenous Forest managed by Timberlands West Coast. A Report prepared for the Office of Treaty Settlements.

2. Disturbance Limits and Rehabilitation

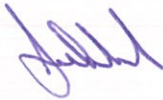
The proposed mining area also requires land use consent from the West Coast Regional Council. RC10253 covers this and we enclose a copy of it for your records. Earlier this year the consent was varied to allow the maximum area of unrehabilitated land to not exceed 5 hectares(condition 1.4) and the bond increased substantially to cover this. You will note also that RC10253 allows for the clearing of the vegetation discussed above but not the area to the southwest of it. Therefore the maximum area

of land to be disturbed at any time will not exceed 5 hectares.

3. Visual Screening

The site where mining and vegetation clearance will take place is generally well screened from the residents of the Stafford township primarily by the bush clad sandstone outlier and the riparian vegetation along the south side of Waimea Creek which is to be retained for both this purpose and the ecological values under the mining proposals. The key neighbouring properties from which the operation would be visible are those adjoining Stafford Loop Road and those fronting the operation on Ballarat Rise. We have already forwarded affected party approval from Mark Falloon and Karen Gregory as well as Andy Thompson from the Stafford Loop Road and are aware that consents have been lodged to mine the block on the north side of the road where the Stafford Dredge sank in the early 1940's so on balance believe that they are not concerned with the visual impact. The Danford property on the Stafford Loop Road already has extensive tree cover on it's own boundary which effectively screens the proposed mining area from the residence. With respect to the two main dwellings at the western end of Ballarat Rise there is little that can be done as they look down on the area across land that is already cleared as paddocks and will inevitably be able to see the mining from their elevated sites. We had not considered placing a bund on the western edge of the proposed operation but accept that this would screen the operation visually from the Stafford Loop Road and also reduce any noise arising from the operations. A 3 metre bund in this area may well be appropriate.

Yours sincerely



John Wood