

From: [Kate McKenzie](#)
To: [RPS](#)
Subject: Submission of Stoney Creek Mining Ltd and Alluvium Ltd on proposed Otago Regional Policy Statement
Date: Thursday, 2 September 2021 7:56:35 p.m.
Attachments: [02092021 Stoney Creek Mining Ltd Alluvium Ltd Submission PORPS.pdf](#)

To whom it may concern,

Please find attached a submission on behalf of Stoney Creek Mining Ltd and Alluvium Ltd on the proposed Otago Regional Policy Statement.

Regards,

Kate McKenzie

Principal Planner



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**SUBMISSIONS ON THE PROPOSED OTAGO REGIONAL POLICY STATEMENT
Under Clause 6 of the First Schedule of the Resource Management Act 1991**

To: Otago Regional Council
Private Bag 1954
Dunedin 9054

By email: RPS@orc.govt.nz

Submitter: Alluvium Ltd and Stoney Creek Mining Ltd

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PO Box 257
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1. Submitters

- 1.1 On behalf of Alluvium Ltd, Stoney Creek Mining Ltd (the submitter), we submit on the proposed Otago Regional Policy Statement (pRPS).
- 1.2 The submitter could not gain an advantage in trade competition through this submission.
- 1.3 The submitter has multiple mineral permit interests in the Nevis Valley, and the pRPS will have a direct impact on these interests.
- 1.4 The submission relates to the pRPS in its entirety, and specific provisions include:
 - 1.4.1 Integrated Management policies
 - 1.4.2 Air policies
 - 1.4.3 Land and Freshwater objectives and policies
 - 1.4.4 Ecological and Indigenous Biodiversity policies and methods
 - 1.4.5 Historic Heritage policies
 - 1.4.6 Natural Features and Landscapes objectives and policies
 - 1.4.7 Urban Form and Development policies
 - 1.4.8 Appendices
- 1.5 The reasons for the submission and the relief sought are set out below.



- 1.6 The suggested revisions do not limit the generality of the reasons for the submission.
- 1.7 The submitter wishes to be heard in support of this submission.
- 1.8 The submitter will consider presenting a joint case with others presenting similar submissions.

2. Background to the submission

- 2.1 The submitter has alluvial gold mining interests in the Nevis Valley, including:
 - 2.1.1 Minerals Mining Permit 41734
 - 2.1.2 Minerals Exploration Permit 41400
 - 2.1.3 Minerals Exploration Permit 54815
- 2.2 The Nevis Valley, while recognised as a scenic alpine environment, and subject to the Kawarau Water Conservation Order, also contains significant mineral resources. These resources have been continuously extracted throughout the 19th and 20th centuries, and mining (current and historic) therefore forms part of the landscape in the Nevis Valley.

3. Summary of submission

- 3.1 The submitter wishes to submit on the pRPS as he has concerns that the pRPS does not adequately provide for minerals exploration, extraction and processing activities in the Otago region. These activities are a vital part of the Otago economy, and have a functional need to be located where the mineral resources exist. This means that it is not always possible to avoid certain features, such as landscapes, ecological values and historic heritage. The pRPS should recognise and provide for this functional need through supportive policies which provide a pathway for consenting such activities.
- 3.2 The table in Attachment A to this submission sets out detailed reasons for the submissions and specific relief sought, however the submitter also seeks any other relief necessary to give effect to the matters raised generally in this submission.

4. Reasons for the submission

- 4.1 The submitter has concerns that the rRPS does not recognise the functional need for minerals exploration, extraction and processing activities to locate where the resource exists, nor provide for such activities as anticipated activities in the rural area. The pRPS also contains very little support for activities which significantly contribute to the economic wellbeing of individuals and communities within the region. The Partially Operative Otago Regional Policy Statement 2019 (RPS 2019) contains such provisions, which provide a pathway for consenting these activities where other objectives and policies present potentially insurmountable barriers to obtaining consent. There is no analysis in the section 32 report for such a fundamental change in the regional policy direction. Mining is only referred to in the section

32 report in the context of historic issues associated with authorisations under different legislation, and not in the current context of it being a vital part of the economy and having particular locational requirements. The resulting pRPS is unbalanced and out of step with the purpose of the Resource Management Act 1991 (RMA), which seeks to enable people and communities to provide for their economic wellbeing.

- 4.2 The Description of the Region¹ and SRMR-I10 in the pRPS recognise that mining activities contribute significantly to the of GDP in the Otago region. This is a significant contribution, more so than in many other regions in the country, and the pRPS should therefore be cognisant of the need for individuals and communities to provide for their economic wellbeing by providing pathways for minerals extraction and other activities which contribute significantly to the GDP of the region to occur, provided environmental outcomes are achieved.
- 4.3 The New Zealand Government has produced a Minerals and Petroleum Resource Strategy, which underpins the Government’s approach to minerals and petroleum extraction until 2029. This strategy recognises the importance of minerals extraction to the New Zealand economy, and highlights that mining of particular elements are critical to achieved a carbon neutral economy. It is the submitter’s view that the pRPS should be cognisant of the Government’s minerals strategy, the need for extraction of a wide range of minerals, including gold, and not unreasonably restrict the extraction of such minerals. This includes ensuring an affordable and secure supply of resources that are required to support the New Zealand economy, particularly by being enabling of prospecting and exploration.
- 4.4 It is important to note that the National Planning Standards 2019 contain a definition of “primary production” – this definition includes mining and quarrying. However, the only reference to the term primary production in the pRPS is in relation to the protection of highly productive land. There is no recognition of the importance of minerals extraction to the economic wellbeing of communities, the fact that minerals extraction is an activity which occurs in the rural areas of the region, nor the reality that mineral extraction must occur where the resource exists. This was explicitly recognised and provided for in the RPS 2019, and the submitter seeks that these provisions are carried forward into the pRPS.
- 4.5 The submitter is concerned about a number of land and freshwater provisions which fail to recognise the functional need for certain activities to occur in various locations, and which place potentially unworkable and stringent requirements on future consent applications for minerals extraction.
- 4.6 The submitter suggests amendments to the ecosystems and indigenous biodiversity provisions to ensure that effects management hierarchy set out in the pRPS can be appropriately applied.

¹ This section of the pRPS states: “Otago’s economy centres around agriculture, tourism, *mineral* mining, and education.”

- 4.7 The submitter is concerned about the historic heritage provisions proposed in the pRPS, which would have significant impacts on fixed in location resource such as minerals extraction. This is particularly problematic for gold mining where current mining proposals often coincide with historic workings, because these areas are where the resource often exists. The historic heritage provisions need to provide a pathway for allowing activities with a functional need to locate in areas where historic heritage exists.
- 4.8 The submitter has concerns about the natural features and landscapes provisions, which the Otago Regional Council has recently used to submit against a mining proposal in the Nevis Valley. The submission of the Council on this application demonstrates that the provisions as worded are unworkable and fail to recognised the functional needs of certain activities such as minerals extraction to locate in certain areas. Changes are proposed to these problematic provisions to recognise these needs.

5. Relief sought

- 5.1 The submitter generally seeks that the pRPS recognises through balanced and supportive provisions, the importance of minerals extraction to the Otago economy and, the ability of people and communities to provide for their economic wellbeing.
- 5.2 The table in Attachment A sets out the specific relief sought by the submitter.
- 5.3 In addition, the submitter seeks any alternative, consequential, or necessary additional relief to give effect to the matters raised generally in this submission.



Signed on behalf of **Alluvium Ltd and Stoney Creek Mining Ltd**

Kate McKenzie

Principal Planner

Tai Poutini Resources Ltd

Attachment A: Specific submission points

Plan Provision	Position	Reason for submission	Relief sought
Part 2 – Resource Management Overview			
IM-P2	Oppose	<p>The policy seeks to prioritise the natural environment over the health needs of people and the ability of people and communities to provide for their social, economic and cultural well-being. This appears to be generally applying the Te Mana o Te Wai concept and hierarchy of obligations contained in the National Policy Statement for Freshwater Management to protection of the wider natural environment. This is a national direction to specifically address freshwater management, not the wider environment.</p> <p>The section 32 analysis specifically notes in para 218 that if “tensions arise between provisions or domains, IM-P2 provides a pathway for resolving them”. There is insufficient analysis of the implications of this overarching policy, which may have wide reaching implications for activities across the region.</p>	Delete IM-P2
Part 3 – Domains and Topics			
AIR-P3, AIR-P4	Support	<p>These policies provide for air discharges provided the discharge does not give rise to adverse effects, and seeks to manage effects of air discharges. It is important to provide for activities which cannot avoid discharges to air, which include alluvial mining operations.</p>	Retain the policies as worded.



Attachment A: Specific submission points

LF-WAI-P3		<p>This policy seeks to “sustain” connections and interactions between land and water and habitats of mahika kai and indigenous species. The section 32 report suggests that WAI-P3 gives effect to the National Policy Statement for Freshwater Management, however this policy is more stringent than the NPS requires.</p> <p>While it may be theoretically possible, it is not always practicable to enhance connections and interactions and habitats. Accordingly we consider “where practicable” to be a more appropriate threshold to apply to these matters, to allow a degree of discretion to be applied in RMA processed in the Otago region. This is more consistent with the wording of the NPS.</p>	<p>Amend the policy as follows (strikethrough and underline)</p> <p>Manage the use of <i>fresh water</i> and <i>land</i> in accordance with tikaka and kawa, using an integrated approach that:</p> <ol style="list-style-type: none"> 1. recognises and sustains <u>maintains</u> the connections and interactions between <i>water bodies</i> (large and small, surface and ground, fresh and coastal, permanently flowing, intermittent and ephemeral), 2. sustains <u>maintains</u> and, wherever possible <u>practicable</u>, restores the connections and interactions between <i>land</i> and <i>water</i>, from the mountains to the sea, 3. sustains <u>maintains</u> and, wherever possible <u>practicable</u>, restores the habitats of mahika kai and indigenous species, including taoka species associated with the <i>water body</i>,
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Attachment A: Specific submission points

LF-FW-P9	Oppose	<p>This policy seeks to avoid effects on natural wetlands, however it does not recognise that some activities have a functional need to operate in certain locations, which may or may not contain a wetland. It is acknowledged that this policy is largely contained with the NPS for Freshwater Management, and regional authorities are directed to include it, however the policy as worded is problematic for a range of activities, and should be amended.</p> <p>The NPS allows for a general consideration of the loss of extent, for example through creation/augmentation of additional wetlands so there is no overall loss, however the policy as worded may not allow this.</p> <p>In the event that any changes to the NPS Freshwater Management are made in relation to this policy during the development of the pRPS, these changes should be reflected in the final RPS.</p>	<p>Protect <i>natural wetlands</i> by:</p> <ol style="list-style-type: none"> 1. avoiding a reduction in their values or extent unless: <p>...</p>
LF-FW-P12		<p>This policy seeks to protect outstanding water bodies by avoiding adverse effects. This is not the terminology specified in section 6 of the RMA which seeks to protect outstanding water bodies from inappropriate subdivision, use and development. The wording proposed is considered to be overly restrictive, as it is not always possible to avoid adverse effects of development, especially for activities which have a functional need to operate in certain locations, such as minerals extraction.</p>	<p>Amend the policy as follows (strikethrough and underline)</p> <p>The significant and outstanding values of <i>outstanding water bodies</i> are:</p> <ol style="list-style-type: none"> 1. identified in the relevant <i>regional</i> and <i>district plans</i>, and 2. protected by avoiding adverse effects on those values <u>from inappropriate subdivision, use and development.</u>



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LF-FW-P13	Support	This policy recognises that some activities (including minerals extraction) have a functional need to locate in certain areas, including in rivers. The policy provides for the management of effects in accordance with ECO-P3, ECO-P6 or the effects management hierarchy (as appropriate) which is in line with the National Policy Statement for Freshwater Management.	Retain the policy as worded.
LF-LS-O11, LF-LS-P19	Neutral	This objective and policy use the term “primary production” which as defined includes mining and quarrying (and forestry). UFD-P7 subsection 3 refers to enabling primary production particularly on highly productive land. It should be noted that a strict application of this policy could result in perverse outcomes due to the broad nature of the term “primary production”. In the case of minerals extraction, there should be no preference to this occurring on highly productive land, because it must occur where the resource exists.	Consider whether the objective and policy wording can be clarified in any way.

Attachment A: Specific submission points

LF-LS-P21	Oppose	<p>This policy seeks to reduce direct and indirect discharges of contaminants to water from land use activities, which include mineral extraction. This policy could be problematic because it is not always possible to avoid discharges to water from a wide range of activities, especially indirect discharges. It is important to manage the effects of discharges on water quality, rather than seeking to reduce them.</p>	<p>Amend the wording of the policy as follows (strikethrough and underline):</p> <p>Achieve the improvement or maintenance of <i>fresh water</i> quantity or quality to meet <i>environmental outcomes</i> set for <i>Freshwater Management Units</i> and/or rohe by:</p> <ol style="list-style-type: none"> 1. <u>where practicable</u>, reducing direct and indirect <i>discharges of contaminants</i> to <i>water</i> from the use and development of <i>land</i>, and 2. managing <i>land</i> uses that may have adverse <i>effects</i> on the flow of <i>water</i> in surface <i>water bodies</i> or the recharge of <i>groundwater</i>.
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<p>LF-LS-M12</p>	<p>Oppose</p>	<p>It is unclear why District Plans must seek to minimise the removal of tall tussock grasslands, or how these are defined. The only reference to tussocks in the section 32 analysis is in relation to the Taieri Freshwater Management Unit, therefore there is no supporting analysis to require all territorial authorities in the Otago region to implement this requirement in their district plans.</p>	<p>Amend the wording of the method as follows (strikethrough and underline):</p> <p><i>Territorial authorities</i> must prepare or amend and maintain their <i>district plans</i> no later than 31 December 2026 to:</p> <ol style="list-style-type: none"> 1. manage <i>land</i> use change by: <ol style="list-style-type: none"> a. controlling the establishment of new or any spatial extension of existing <i>plantation forestry activities</i> where necessary to give effect to an objective developed under the NPSFM, and b. minimising the removal of tall tussock grasslands, and
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<p>ECO-P3, ECO-P4, ECO-P6, ECO-M4, ECO-M5</p>	<p>Oppose</p>	<p>These policies seek to apply the effects management hierarchy where it is not possible to avoid adverse effects on significant natural areas (P3) and indigenous biodiversity generally (P6). This is particularly important for fixed in location mineral resources, as it is not always possible to avoid certain areas and features.</p> <p>The approach to allowing an effects management approach where avoidance is not possible is supported, however P3, P4 and P6 (and M4 and M5) link to a definition of “effects management hierarchy” in the pRPS which only applies to wetlands and rivers because the definition is adopted from the National Policy Statement for Freshwater Management. These provisions should be reworded to delete reference to the NPS definition to avoid confusion and any inference that the effects management hierarchy can only be applied to freshwater significant natural areas and indigenous biodiversity.</p> <p>Without the amendments sought, there is a lack of clarity for extractive activities as to whether the effects management hierarchy in ECO-P6 can be applied to all significant natural areas and indigenous biodiversity, or whether this only applies to these matters in relation to freshwater.</p>	<p>Amend ECO-P3, ECO-P4, ECO-P6, ECO-M4, ECO-M5 as follows (strikethrough and underline):</p> <p>ECO-P3</p> <p>...</p> <p>2. after (1), applying the biodiversity effects management hierarchy <u>sequential steps set out in ECO-P6</u>, and</p> <p>...</p> <p>ECO-P4</p> <p>Maintain Otago’s indigenous <i>biodiversity</i> by following the sequential steps in the effects management hierarchy set out in <u>ECO-P6</u> when making decisions on plans</p> <p>...</p> <p>ECO-P6</p> <p>Maintain Otago’s indigenous <i>biodiversity</i> (excluding the coastal environment and areas managed under <u>ECO-P3</u>) by <u>sequentially</u> applying the following <i>biodiversity</i> effects management steps hierarchy in decision-making on applications for <i>resource consent</i> and notices of requirement:</p> <p>...</p>
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			<p>ECO-M4</p> <p>2. require:</p> <ul style="list-style-type: none"> a. resource consent applications to include information that demonstrates that the sequential steps in the effects management hierarchy in ECO-P6 have been followed, and b. that consents are not granted if the sequential steps in the effects management hierarchy in ECO-P6 have not been followed, and <p>ECO-M5</p> <p>4. require:</p> <ul style="list-style-type: none"> a. resource consent applications to include information that demonstrates that the sequential steps in the effects management hierarchy in ECO-P6 have been followed, and b. that consents are not granted if the sequential steps in the effects management hierarchy in ECO-P6 have not been followed, and
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Attachment A: Specific submission points

HCV-HH-P3	Oppose	<p>This policy sets out a list of features which are considered to be historic heritage in the Otago region. This includes vague items such as “gold and other mining systems and settlements”, “pastoral sites”, “dredge and shipwrecks”, “trees and vegetation” without any further qualification as to how to distinguish features which may have heritage value from those that don’t. This policy will guide territorial authorities when determining for the purpose of identifying and protecting historic heritage in district plans. The list, without qualification, could require territorial authorities to identify features simply because they are on this list, whether worthy of protection or not.</p> <p>As historic heritage is defined in the RMA, is it not considered necessary or appropriate to include such a directive list in a policy in the pRPS, and the policy should be deleted.</p>	Delete the policy.
HCV-HH-P4	Oppose	<p>This policy refers to identifying historic heritage in accordance with APP8, however APP8 contains inappropriate criteria in an RMA context. For further explanation, please see relief sought in relation to APP8.</p>	Amend APP 8 to remove reference to criteria which do not form part of the definition of historic heritage in section 2 the RMA. (see relief sought on APP8 below)

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HCV-HH-P5	Oppose	<p>This policy sets out how the pRPS seeks to protect historic heritage. This includes through a strict avoidance policy for special or outstanding historic heritage values or qualities, without explanation as to how “special” or “outstanding” is determined. Such an avoid policy is particularly problematic for minerals extraction activities, especially in the case of gold mining. Current prospecting, exploration and extraction often overlap with historic mining activities, as historic mining activity mostly occurred where gold resources were richest. Current technology enables more complete extraction of the resource, so previous workings are often re-worked.</p> <p>The Heritage New Zealand Pouhere Taonga Act provides protection for the most significant archaeological sites through the requirement for archaeological authorities to be obtained for modification or disturbance. It is therefore considered unnecessary to contain such a restrictive policy in the pRPS, as it is duplicating protections under other legislation.</p>	<p>Amend the policy as follows (strikethrough and underline):</p> <p>Protect <i>historic heritage</i> by:</p> <ol style="list-style-type: none"> 1. requiring the use of accidental discovery protocols, 2. avoiding adverse effects on areas or places with special or outstanding historic heritage values or qualities; 3. avoiding significant adverse effects on areas or places with historic heritage values or qualities; 4. avoiding, as the first priority, other adverse effects on areas or places with <i>historic heritage</i> values or qualities, 5. where adverse effects demonstrably cannot be completely avoided, remedying or mitigating them, and 6. recognising that for <i>infrastructure</i>, EIT-INF-P13 applies instead of HCV-HH-P5 (1) to (5).
HCV-HH-P6	Oppose	<p>This policy seeks to enhance places of historic heritage wherever possible, including through resource consent decisions. As noted in other relief sought above, what is theoretically possible and practicable are very different. It is considered that requiring enhancement whenever possible would place a significant burden on consent applicants, and whenever practicable is more appropriate wording</p>	<p>Amend the policy as follows:</p> <p>Enhance places and areas of historic heritage wherever possible <u>practicable</u> through the implementation of plan provisions, decisions on applications for resource consent and notices of requirement and non-regulatory methods.</p>



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NFL-O1	Oppose	<p>This objective seeks to protect outstanding natural features and landscapes, without further qualification. This fails to recognise the functional need for some activities to locate in such areas, including minerals extraction. Valuable minerals can coincide with outstanding natural features and landscapes, and if managed appropriately are not necessarily inappropriate. The recent submission by the Otago Regional Council on the Foothills Mining Ltd application for alluvial gold mining in the Nevis Valley states that the proposal does not have regard to this objective in the pRPS (notwithstanding that the pRPS didn't exist when the application was lodged). This submission demonstrates why such an objective is inappropriate particularly as it relates to fixed in location resources.</p> <p>It is considered that this objective should be amended to refer to the wording in section 6 of the RMA and reference inappropriate subdivision, use and development, to recognise that not all activities are inappropriate.</p>	<p>Amend the objective as follows (strikethrough and underline):</p> <p>The areas and values of Otago's outstanding and <i>highly valued natural features and landscapes</i> are identified, and the use and development of Otago's <i>natural and physical resources</i> results in:</p> <ol style="list-style-type: none"> 1. the protection of outstanding natural features and landscapes from inappropriate subdivision, use and development, and 2. the maintenance or enhancement of highly valued natural features and landscapes.
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NFL-P2	Oppose	<p>This policy fails to recognise the functional need for some activities to locate in such areas, including minerals extraction. Valuable minerals can coincide with outstanding natural features and landscapes, which may require some leniency to a strict avoidance policy.</p> <p>The recent submission by the Otago Regional Council on the Foothills Mining Ltd application for alluvial gold mining in the Nevis Valley states that the proposal does not have regard to this objective in the pRPS (notwithstanding that the pRPS didn't exist when the application was lodged). This submission demonstrates why such a policy is inappropriate particularly as it relates to fixed in location resources.</p>	<p>Protect outstanding natural features and landscapes by:</p> <ol style="list-style-type: none"> 1. <u>avoiding, as the first priority, adverse effects</u> on the values that contribute to the natural feature or landscape being considered outstanding, even if those values are not themselves outstanding, and <u>where adverse effects demonstrably cannot be completely avoided due to the functional needs of an activity to locate within outstanding natural features or landscapes, remedying or mitigating them, and</u> 2. avoiding, remedying or mitigating other adverse effects.
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<p>UFD-P7 – Rural Areas</p>	<p>Support with amendments</p>	<p>This policy seeks for the maintenance, and where possible, enhancement of features and values identified elsewhere in the pRPS. This approach to the management of rural areas is supported, however explicit recognition of the place mineral extraction activities have in the rural environment is required. Generally extractive activities only occur in rural environments, so it is important to recognise this activity in the pRPS objectives and policies.</p> <p>This policy uses the term “primary production” which as defined includes mining and quarrying. UFD-P7 subsection 3 refers to enabling primary production particularly on highly productive land. While some minerals exist in highly productive land, they exist throughout the rural areas of the Otago region, and there should be explicit recognition that minerals exploration, extraction and processing will occur in the wider rural area, not just on highly productive land. This is recognised in the RPS 2019, and this recognition should be retained in the pRPS. There is no analysis in the section 32 report to support such a shift away from providing a pathway for minerals extraction to occur.</p>	<p>Amend wording (changes in strikethrough and underline) as follows:</p> <p>The management of <i>rural areas</i>:</p> <p>...</p> <ol style="list-style-type: none"> 7. otherwise limits the establishment of residential activities, <i>sensitive activities</i>, and non-rural businesses to those that can demonstrate an <i>operational need</i> to be located in <i>rural areas</i>; and 8. <u>provides for mineral exploration, extraction and processing.</u>
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NEW			Include the following policy in the pRPS: <u>Recognise the functional needs of mineral exploration, extraction and processing activities to locate where the resource exists.</u>
APP2	Oppose	APP2 sets out a list of criteria for determining a Significant Natural Area. The section 32 analysis states that the	

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APP8	Oppose	<p>Appendix 8 lists the criteria which allow a site to be considered historic heritage and worthy of protection. Section 2 of the RMA sets out what is considered historic heritage. There is no mention of the terms “aesthetic”, “social”, “Spiritual” or “traditional” in the definition of section 2 of the RMA, and it is considered entirely inappropriate to include these as criteria for determining historic heritage.</p> <p>The section 32 analysis indicates that the additional criteria come from the Heritage New Zealand Pouhere Taonga Significance Assessment Guidelines; however these guidelines were developed based on the criteria which Heritage New Zealand are required consider under the Heritage New Zealand Pouhere Taonga Act when determining whether to add a historic place or area to the New Zealand Heritage List. It is not appropriate to use these criteria in an RMA context without comprehensive analysis of the implications of doing so.</p>	<p>Remove the following criteria from the list in Appendix 8:</p> <p>Aesthetic: The place has, or includes, aesthetic qualities that are considered to be especially pleasing, particularly beautiful, or overwhelming to the senses, eliciting an emotional response. These qualities are demonstrably valued, either by an existing community or the general public, to the extent that they could be expected to experience a sense of loss if the qualities which evoke the aesthetic value were no longer there.</p> <p>Social: The place has a clearly associated community that developed because of the place, and its special characteristics. The community has demonstrated that it values the place to a significant degree because it brings its members together, and they might be expected to feel a collective sense of loss if they were no longer able to use, see, experience or interact with the place.</p> <p>Spiritual: The place is associated with a community or group who value the place for its religious, mystical or sacred meaning, association or symbolism. The community or group regard the place with reverence, veneration and respect, and they might be expected to feel a collective sense of loss if they were no longer able to use, see, experience or interact with the place.</p> <p>Traditional: The place reflects a tradition that has been passed down by a community or culture for a long period, usually generations and especially since before living memory, and has characteristics reflecting important or representative aspects of this tradition to a significant extent.</p>
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