

**SUBMISSION  
ON AN APPLICATION FOR RESOURCE CONSENT  
UNDER SECTION 96  
OF THE RESOURCE MANAGEMENT ACT 1991**

Office Use Only



**PART A: DESCRIPTION OF APPLICATION**

CONSENT NUMBER:

APPLICANT:

WCRC: RC-2023-0046 GDC: LUN3154/23

Minerals and Metals Limited

DESCRIPTION OF PROPOSED ACTIVITY:

Establish and operate a mineral sands mine, including construction of associated infrastructure.

LOCATION:

Barrytown Flats, west of State Highway 6 (Coast Road), 9km south of Punakaiki township and 36km north of Greymouth.

**PART B: SUBMITTER DETAILS**

Full name/s	Wild Coast Limited - Pancake Rocks Cafe, Rataview Function Centre. Paparoa Park Motel		
Postal address	[REDACTED]		
I am the owner/occupier (delete one) of the following property:	Owner		
Primary contact person/s	Kirsty Henderson		
Email address	[REDACTED]		
Phone number/s	Home: [REDACTED]	Business: [REDACTED]	
	Mobile: [REDACTED]	Fax: [REDACTED]	

Signature:	Date:
[REDACTED]	11/10/2023
Name (BLOCK CAPITALS):	
KIRSTY HENDERSON	

*If this is a joint submission by 2 or more individuals, each individual's signature is required  
A signature is not required if you make your submission by electronic means.*

I/we **support** the application numbers indicated by a tick on the back of this form

I/we **oppose** the application

I/we **neither support nor oppose** the application

(tick one)

(tick one)

I/we **wish to be heard** in support of my/our submission.

I/we **DO NOT wish to be heard** and hereby make my/our submission in writing only.

If you wish to be heard, and others make a similar submission would you consider making a joint case with them at any hearing

 Yes No

If you indicated you wish to be heard, you will be sent a copy of the S.42A Officer's Report and a copy of the Decision once it is released. Please indicate below which format you would like to receive these documents in:

 Electronic (CD) copy Hard (paper) copy

I/we **have** served a copy of my/our submission on the Applicant as per Section 96(6)(b) of the RMA

 Yes

My/our submission is that: (state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific proposal, or wish to have amendments made, giving reasons)

Oppose application  
Please see attached

I/we seek the following decision from the Local Authority:(give precise details)

Please see attached

**Important information – please read carefully**

**Public information**

The information you provide is public information. It is used to help process a resource consent application and assess the impact of an activity on the environment and other people.

Your information is held and administered by the West Coast Regional Council in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. This means that your information may be disclosed to other people who request it in accordance with the terms of these Acts. It is therefore important you let us know if your form includes any information you consider should not be disclosed.



**THE WEST COAST**  
REGIONAL COUNCIL

388 Main South Road, Paroa, Greymouth 7805  
PO Box 66, Greymouth 7840  
Telephone (03) 768 0466  
Toll Free 0508 800 118  
Facsimile (03) 768 7133  
Email [info@wrc.govt.nz](mailto:info@wrc.govt.nz)  
Website [www.wrc.govt.nz](http://www.wrc.govt.nz)

## **MY SUBMISSION IS THAT:**

WE OPPOSE THE SUBMISSION.

Our company operates several businesses in the Barrytown/Punakaiki area and strongly oppose the proposal for open cast mining at this location, some of these reasons are outlined in the following submission.

In summary, it would be a backward step for the Coast's Untamed Natural Wilderness to allow mining here. This location is:

- Next door to the Paparoa National Park
- Immediately adjacent to SH6 tourist route
- Using the narrow winding roads on one of the top-rated scenic drive in the world.

There are too many associated issues of vehicle movements and emissions, noise pollution, visual pollution, risk to Taiko, spurious economic benefit claims, and reasons that I am sure others will cover.

The associated reports presented in the application by TiGa are paid for by TiGa and written to cast a positive light on their proposed operations and conveniently miss some facts and overlook other important factors.

### **1. NOISE OF MINE**

Refer: Marshall Day 'Assessment of Noise affects' Acoustics report

Whilst the predicted noise generated may be below the 70dB max limits, I believe the type of noise will be detrimental to locals and tourists in the surrounding vicinity. The overnight operation of the processing plant is likely to produce a background 'hum' (unsure of the exact nature of the type of noise), and other associated noise that, even if it is at 50dB will still be extremely annoying and will preclude restful uninterrupted sleep. This consideration has not been taken into account by the report. Their sole focus is on noise maximums and not on 'type' of noise. Their report measures ambient sea noise at 40-50 dB, this noise is quite a different overnight sound to the 50db that will be generated by 24 hour Mine processing operations. Similarly the bird, sea and cicada noises they mention are pleasant nature sounds and nothing like the sound of a mineral mine and associated processing and vehicles etc.

There is no mention of sound insulation of the processing building. Given it will be working all night, this needs to be mandatory, including on roller doors.

05h00 as a reasonable time to start heavy truck movement is totally unreasonable, in what world is 05h00 a normal start of the day? Certainly not for locals and certainly not for many holidaying bach owners and tourists staying on the Coast Rd.

### **2. VEHICLE MOVEMENTS**

Refer: Novo Group Integrated Traffic Assessment report

States that the increase in traffic Movements is 'less than minor'.

I believe this report offers a flawed statement that the traffic increase is 'less than minor':

It states that current movements are in the region of 1100 average annual daily movements (pg 9 Table 6). It also states that the mine will generate approx 390 equivalent car movements per day (pg 10). This is an increase of 35%, many of which are heavy Trucks and Trailers.

Even if you just used the 50 Truck and Trailer plus 140 car movements figure, this is still an increase of 17%

An increase of perhaps less than 5% may be deemed 'less than minor', however an increase of this magnitude of 17% to 35% is not 'less than minor'.

The Implications of this are far reaching and include: noise; increased emissions; precluding safe cycling/cycle-touring on this road; slowing and aggravation of traffic stuck behind large loaded truck and trailer units winding along one of the most beautiful drives in the world (refer many online articles stating this), which has very few passing options etc. The roads on SH6 are very windy and narrow and not designed for these extremely heavy truck and trailer units. I do not believe that they can navigate these roads without crossing the centre line. What happens when they pass each other in opposite directions? With 3-5 truck and trailers per hour, the chances of driving north or south and not being stuck behind one of these are low.

Again - in whose world is it normal to start the day at 05h00?

If the Councils want mining then Waka Kotahi needs the budget to provide sufficient road quality to support it, the current road quality is not up to that standard. From past experience Waka Kotahi do not do road working at the least inconvenient times for business i.e for the inevitable road working needed with the heavy truck and trailers, this needs to happen overnight and not at peak tourist times of the year. But in the first instance road widening, passing lanes, slip stability etc needs to happen prior to you granting this application and in the off-peak tourist season.

SH6 is unsuitable for these type of vehicle movements, it is extremely narrow and winding, there are few passing opportunities and it is often listed in articles as one of the top-rated road trips in the world, as well as the location being near the Paparoa National Park. For these reasons, it has got to be one of the most unsuitable mining locations in the New Zealand.

### **3. ECONOMIC ASSESSEMENT**

Refer: Sense Partners Economic Impacts report by John Ballingall

Point 5: He states that 'Jobs are Hard to come by'. In fact the opposite is true, 'Staff are hard to come by' is the correct term. Operating several businesses on the Coast I feel well qualified to know that he is factually incorrect with assumptions that are not backed with facts and appears to not use accurate knowledge of running a business on The Coast.

Point 16: Tourism is struggling to recover from Covid” is absolutely factually incorrect, and he quotes tourism spending figures from 2022, a year in which the International Borders were closed for the most part, and International flights were struggling to get up and running again, he says: “International tourism spending was \$278.0 million in 2019 but just \$9.6 million in 2022”. This is a misleading and outdated statement and should not have been used given the Covid implications.

This article from westcoast.co.nz is more recent: [Tourism revival boosts West Coast economy | West Coast NZ](https://westcoast.co.nz/news/tourism-revival-boosts-west-coast-economy/)

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This quotes the latest Infometrics report that Tourism spending across the region in the year to June was 8% higher than pre-pandemic levels (June 2019 year). I suggest this report writer has not used recent factual data of tourism on the West Coast and has made incorrect statements.

Point 23: He keeps going back to the \$63M gross earnings and the tax and royalties earned. I would like to reiterate that the tax and royalties is money that goes to Central Government and will largely not benefit the West Coast. Tourism earnings are largely kept on the Coast/South Island.

Point 26: Impact on Tourism. He is overlooking the mine location - the mine is not in the far backblocks, he says: “a very small parcel of the West Coast region’s massive land area is unlikely to have any material impact on the decisions of domestic and international tourists to visit”. In fact, this proposed mine is **directly adjacent to SH6 on the main tourist route through the Paparoa National Park and often voted one of the most beautiful drives in the world. Punakaiki’s Pancake Rocks are one of the top visited tourist sites in New Zealand**

This is the insanity of this proposal - the location of the mine is so highly visible and on a main tourist route.

He also basically says that it doesn’t matter if it causes a 25% decrease in tourists because the mine revenue would make up for it - again using the gross \$63M revenue figure and not the net figure, nor what money would be kept on the Coast. So he thinks it’s OK to sacrifice the livelihoods of Coast tourist operators for a small boost to Government coffers. He also overlooks that if people avoid SH6, they would also likely not go down to the Glaciers, across Arthur’s Pass etc, the entire South Island normal tourist routes would be affected and there are implications to more than just this stretch of road. Tourists are very savvy on Social Media and it only takes a few photos of big trucks both slowing the roads and crossing the centre line, and complaints on accommodation review sites about noise all night to give us a bad reputation and this area to be a place to avoid.

Likely huge damage to the ‘Untamed Natural Wilderness’ brand in such a visible site, even if the actual mine is screened, the continual truck and trailer units certainly won’t be, and will be a constant presence and annoyance on SH6. This brand damage caused economic damage we cannot afford, and frankly makes a mockery of the branding.

I implore the Council to get an unbiased and accurate economic assessment done by someone who knows the Coast and uses current figures, to really understand if this sacrifice is worth it, looking at all the pros and cons, not just economic, but impacts on communities too.

#### **4. ECOLOGICAL ASSESSEMENT**

Refer: Avian Management Plan by Ecological Solutions

3.4 Pest Control - says Traps and bait stations will be serviced 12 times per year. This is largely insufficient. Checking rat traps needs to be vastly more frequent than that - stating the obvious, depending on trap type, but you cannot catch a new rat until the dead one is removed - up to 30 days later.

This is a poor attempt at pest control when so many locals are working so hard voluntarily on trap lines etc and this big company will check their traps a mere 12 times per year - such tokenism to the wildlife and the community, this needs to be vastly increased to daily checks, or at least weekly.

4.0 Taiko - says 'taiko might be grounded by lighting' in various locations, and has TiGa self-monitoring the effect. This risk is not worth taking. Taiko are incredibly endangered and this is their only known breeding ground in the world. The mine should not go ahead **on these grounds alone**. More lighting controls to prevent disorienting Taiko are required - lighting is well known to grounding Taiki, yet this report uses the words 'low-risk'.

Are Taiko affected by noise - 24/7 plant working may have an impact, this seems to have not been assessed, does it disorient them as well as light?

A more detailed assessment by a specific Taiko expert should be undergone.

#### **I SEEK THE FOLLOWING DECISION:**

Resource Consent should be declined.

Mining should never be allowed to operate here in such a place of natural beauty on one of the most scenically sensitive and beautiful road trips in the world, adjacent to a National Park and close to the only Taiki breeding colony in the world. There is no way a mine should be allowed in this scenic location and adjacent to a SNA. The economic impact assessment uses outdated and incorrect information and a more accurate, current one should be used to assist in making this decision.

If granted then:

- Further noise control on the processing building that will be operating all day and all night. Sound proofing of mine processing building is required to mitigate background noise, no matter if it is below the technical limit. We want to hear the sea overnight, not Mining operations.
- Get the roads ready now - for this volume of trucks and trailers and increased light vehicles, get the roads ready in advance - do road widening, add passing lanes, stabilize known slip areas and get your maintenance up to speed before this happens. Otherwise we are facing years of closed roads for maintenance of potholes and worse and other fixes caused by heavy traffic, years of being stuck behind slow, heavy diesel units, years of complaints from tourists. Get noise dampening plantings etc near houses - be proactive in advance and not reactive.
- Monitor actual, accurate economic impact in future RC decisions on this mine.
- Further assessment of Taiko implications and monitoring; increased pest control and more lighting controls to prevent disorienting Taiko
- TiGa should provide funding to West Coast Tourism for Re-branding, you cannot continue to call it Untamed Natural Wilderness if you grant this mine consent.