

**FORM 13: 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	TIGA MINERALS AND METALS LTD
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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	Rhiannon Williams		
Postal address	[REDACTED]		
I am the <del>owner</del> /occupier (delete one) of the following property:			
Primary contact person/s			
Email address	[REDACTED]		
Phone number/s	Home:	[REDACTED]	Business:
	Mobile:	[REDACTED]	Fax:

Signature of the submitter (or person authorised to sign on behalf of the submitter):	Date:
	11/10/2023
Name (BLOCK CAPITALS):	
Rhiannon Williams	

*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

The specific parts of the application that my submission relates to are: *(give details)*  
See Attached

My/our submission is that: *(include whether you support or oppose the application or specific parts of it; whether you are neutral regarding the application or specific parts of it; and the reasons for your views).*

I/we seek the following decision from the Local Authority:(give precise details)  
That the application be declined in its entirety.

I ~~am~~/am not\* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

\*Select one.

\*I am/~~am not~~† 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.

†Select one.

I request/~~do not request~~\*, 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.

\*select one.

**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 and Grey District 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.

<b>West Coast Regional Council</b> 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 <a href="mailto:info@wcrc.govt.nz">info@wcrc.govt.nz</a> Website <a href="http://www.wcrc.govt.nz">www.wcrc.govt.nz</a>	<b>Grey District Council</b> 105 Tainui Street PO Box 382 Greymouth, 7840 <a href="mailto:planning@greydc.govt.nz">planning@greydc.govt.nz</a> 03 769 8600
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## Note to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

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.

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.

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.

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 may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

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.

**Submission:**

I oppose the application for the following reasons:

I do not believe the traffic implications to be minor on the surrounding community. More information is required about baseline data in relation to current road users. This being the percentage increase that proposed truck movements (3-5 trucks leaving site per hour) approximately 50 movements a day, would equate to as a portion of total heavy vehicle movements currently on the road.

From approximate calculations based on data provide in the Integrated Transport Assessment in Appendix G of the consent. The current heavy truck movements per day is 70-75. The proposed additional 50 movements a day will be an increase in heavy traffic of 65-70%.

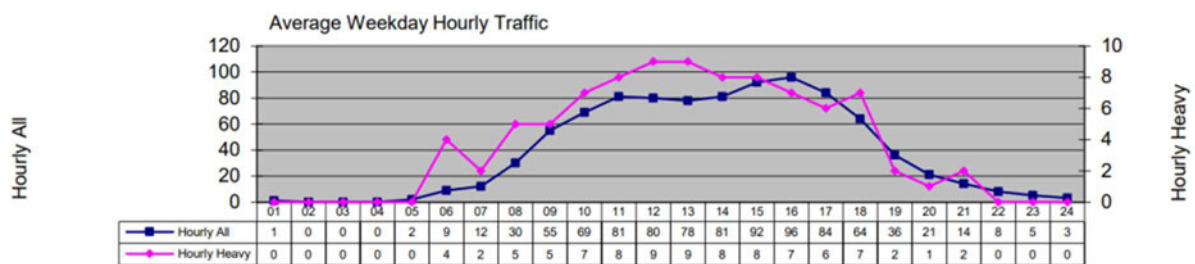


Figure 2: SH6 Punakaiki (Canoe Creek) Telemetry Data

Figure 1- Sourced from the integrated transport report

Particularly concerning along the proposed transport routes are ‘pinch points’ such as the 17 Mile bluff, the 10 Mile Bluff and from Perpendicular point through to Motukutuka Point to name only a few. Where a combination of blind corners, a narrow carriageway and abutting cliffs make this increase in usage particularly hazardous for cyclist and other road users. See crash statistics on Westcoast roads in Figure 2.

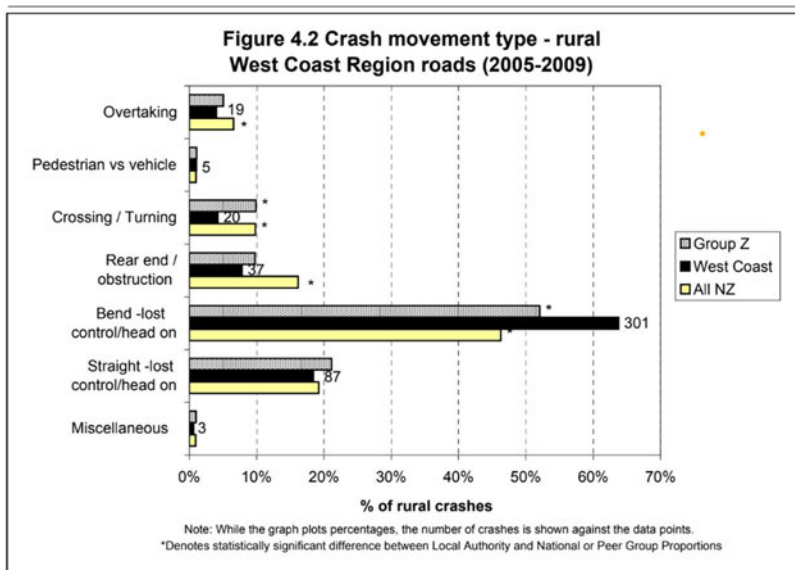


Figure 2 - Showing crash statistics for West Coast being lost control on bends/head on 15% higher than national average (<https://www.nzta.govt.nz/>, 2010)



Figure 3 Pinch point 10 Mile Bluff

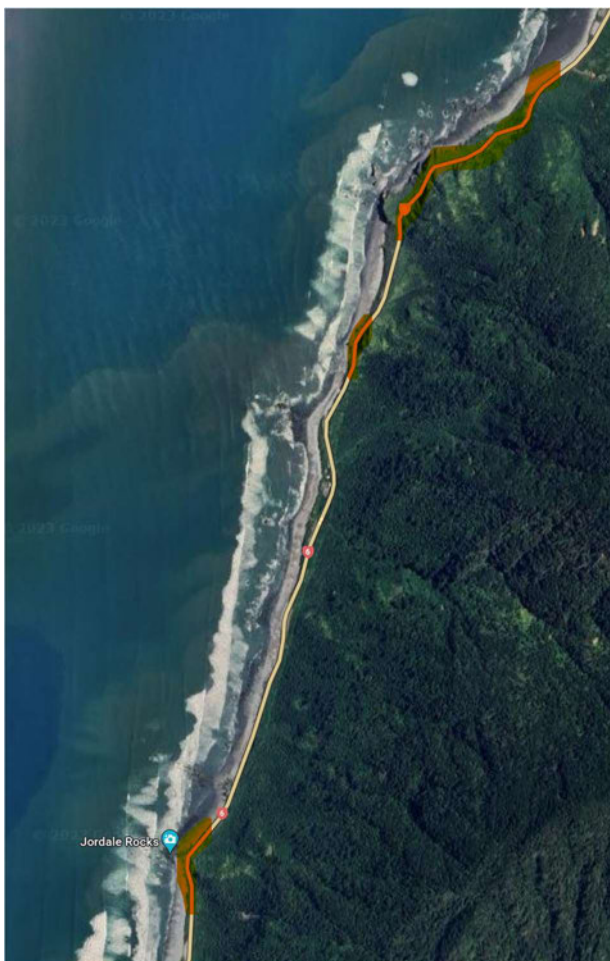


Figure 4 Pinch point examples 13 to 17 mile





Figure 5 Pinch points example North of Punakaiki

No reference has been made or supporting data provided on the effects on Cyclist Safety and with the ever-increasing popularity of bike packing in New Zealand I believe this to be a huge oversight in the submission. Particularly as this road provides access to three of New Zealand's premier multiday bike tracks- The Paparoa track, The Old Ghost Road and the West Coast Wilderness Trail. Notably this submission is in direct contradiction to 'Road to Zero' goal by Waka Kotahi for reasons previously stated.

The proposed transport route was named one of the top 10 coastal drives in the world by Lonely Planet- I do not believe these truck movements will be keeping the character of this as a tourist destination and scenic highway.

Secondly the rehabilitation and riparian planting plan is lacking, not leaving the site with any significant ecological benefits to counter the substantial environmental disturbance- see local projects such as the coastal restoration project of the Westland Ilmenite land at Punakaiki. If projected profits are reached this should be a small portion of the "63m a year in exports" to restore the Wetland environment and regenerate the project site with native vegetation. This is a precedent already being set a mere 7km north of the project with the Te Ara Tāiko Nature Reserve. The capital land value being 1.5 million (equating to just one operational year of mining royalties projected to be paid, or 2.5% net sales). I believe this to be a feasible compromise to bring yet more 'economic benefit' to the region as we have seen by the Conservation Volunteers New Zealand track record of planting and regeneration in the community. The current proposed planting program totalling a total of 2.5 ha equates to a mere 4% of the total project area.

Lastly the consent condition 7.1 outlining a 20m set back from a coastal wetland a neighbouring property who are in opposition to the proposal is entirely inadequate.

Stated in the District wide issues, Objectives and Policies- Coastal Environment document the Council is required to preserve the natural character of the environment and protect it from inappropriate use and development. Given the opposition of both the community, neighbouring properties and environmentalist to this 'mining development' in such close proximity to the sensitive ecological coastal environment, on top of factors like the submission conceding to potentially lowering the water table, not being able to contain dust within the site boundary. I do not believe this submission aligns with the Policy statements out lined in Section 7.4

1. Development, use or subdivision affecting the natural character of the coastal environment shall have particular regard to the following:

b) The presence of significant indigenous vegetation or natural habitat

c) The life supporting capacity of ecosystems or

f) The maintenance and enhancement of high-water quality.

A heavily re-iterated point in the application is the modified nature of the site and down playing ecological significance of the bordering wetland.

I therefore urge the council as a concerned resident of the Coast Road for this application to be declined in its entirety.





