

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

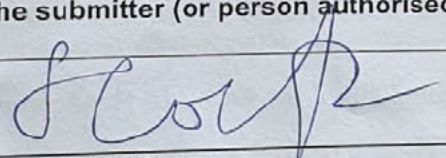
APPLICANT: TIGA MINERALS AND METALS LTD

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	Shelley Lock		
Postal address	[REDACTED]		
I am the owner/occupier (delete one) of the following property:	[REDACTED]		
Primary contact person/s	S. Lock		
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: 13/10/23

Name (BLOCK CAPITALS): Shelley Lock

*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 a 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)*

Please see provided PDF

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)*

No mining in Barrytown

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.**

There are a number of significant reasons I am opposing TiGA Minerals and Metals establishment and operating of a mineral sands mine, including construction of associated infrastructure, in Barrytown, and its vicinity.

1. Local Government Act 2022 – 10/1(a) and (b) and also 14(a),(b) and (c) and 14(h)i  
Noise/views/wellbeing/risk of suicide and depression
2. Greymouth District Plan Rural Zone 19.7/16i and 19.7/16iii Non-rural Activity
3. Non-independent ground testing
4. Lack of provision in long-term plan of rural zone

I must apologise for the order, due to the timeframe of submitting this document.

1. **Local Government Act 2022 – 10/1(a) and (b) and also 14(a),(b) and (c) and 14(h)i  
Noise/views/wellbeing/risk of suicide and depression**

## **Local Government Act 2002**

### **10 Purpose of local government**

(1)

The purpose of local government is—

(a)

to enable **democratic** local decision-making and action by, and on behalf of, communities; and

(b)

to promote the **social**, economic, environmental, and cultural **well-being** of communities in the present and for the future.

By accepting TiGA's proposal, well-being of communities is not been taken into account, with the Council not considering the long-term effects lack of sleep has on a person, and on its community.

Health and wellbeing are affected adversely by lack of sleep, and studies are showing a direct link between sleep deprivation and suicide. [Sleep disturbances and suicide risk: A review of the literature - PMC \(nih.gov\)](#)

This document outlines clearly the link between sleep deprivation and suicide. How can sleep not be affected when a mine is running in a community area, 24hours per day; seven days per week – in effect, every single minute, of every single day, those living close by the mining, for that 5ha section, is grossly affected both with the noise which will persist – sound as we know, is carried in the wind, and Barrytown certainly has a lot of wind!

“Increasing evidence suggests that disturbances in sleep are associated with an elevated risk for suicidal behaviors. Both sleep disorders and general sleep complaints appear to be linked to greater levels of suicidal ideation and depression, as well as both attempted and completed suicide.”

Further statistics relating to suicide in New Zealand is also the issue of mens health and wellbeing. [Seven things you need to know about men's health \(nzma.org.nz\)](https://www.nzma.org.nz/health-topics/mens-health)

This identifies clearly in point 4, suicide is the leading cause of death in men, both males and teenagers, in New Zealand. Yet, here is a mine which is intending to cause great sleep deprivation to its community, and men are part of that community.

On this alone, sleep deprivation is a killer. It causes depression, and suicide, and causes people to make poor decisions. How can you accept a community to not be sleep deprived if a mine is in their 'back or front yard', running 24/7, 365 days of the year.

Furthermore, [Seven things you need to know about men's health \(nzma.org.nz\)](https://www.nzma.org.nz/health-topics/mens-health) also states:

Studies also show that sleep deficiency changes activity in some parts of the brain. If you're sleep deficient, you may have trouble making decisions, solving problems, controlling your emotions and behavior, and coping with change. Sleep deficiency has also been linked to depression, suicide, and risk-taking behavior.

Children and teens who are sleep deficient may have problems getting along with others. They may feel angry and impulsive, have mood swings, feel sad or depressed, or lack motivation. They also may have problems paying attention, and they may get lower grades and feel stressed.

Further identifying factors from the NZMA also state:

Sleep plays an important role in your physical health.

Good-quality sleep:

Heals and repairs your heart and blood vessels.

Helps support a healthy balance of the hormones that make you feel hungry (ghrelin) or full (leptin): When you don't get enough sleep, your level of ghrelin goes up and your level of leptin goes down. This makes you feel hungrier than when you're well-rested.

Affects how your body reacts to insulin: Insulin is the hormone that controls your blood glucose (sugar) level. Sleep deficiency results in a higher-than-normal blood sugar level, which may raise your risk of diabetes.

Supports healthy growth and development: Deep sleep triggers the body to release the hormone that promotes normal growth in children and teens. This hormone also boosts muscle mass and helps repair cells and tissues in children, teens, and adults. Sleep also plays a role in puberty and fertility.

Affects your body's ability to fight germs and sickness: Ongoing sleep deficiency can change the way your body's natural defense against germs and sickness responds. For example, if you're sleep deficient, you may have trouble fighting common infections.

Decreases your risk of health problems, including heart disease, high blood pressure, obesity, and stroke.

\*\*\*

#### **14 Principles relating to local authorities**

(1)

In performing its role, a local authority must act in accordance with the following principles:

(a)

a local authority should—

(i)

conduct its business in an open, transparent, and democratically accountable manner; and

(ii)

give effect to its identified priorities and desired outcomes in an efficient and effective manner:

(b)

**a local authority should make itself aware of, and should have regard to, the views of all of its communities; and**

(c)

when making a decision, a local authority should take account of—

(i)

the diversity of the community, **and the community's interests**, within its district or region; and

(ii)

**the interests of future as well as current communities; and**

(iii)

**the likely impact of any decision on each aspect of well-being** referred to in [section 10](#):

#### **14 Principles relating to local authorities**

(h)

in taking a sustainable development approach, a local authority should take into account—

(i)

the **social, economic, and cultural well-being of people and communities;**

Who would accept housing to be built in a rural area, and they say later, sorry to say, but we will now be keeping you awake 24 hours per day, 7 days per week. We will not allow you to have any quiet time, and your peace and wellbeing will be impacted by us allowing mining within both the view and sound of your residence. If mining was to be completed in this area, it should have been done so, before a community was established.

It does not sit well with the community when the a member of the Council has a financial interest in the mining company; and should not be privy to any discussions, material and information relating to the application process; but more so, if makes for a decision which may be bias, to stay outside by members, with having to adhere to the wants of a Council member.

\*\*\*

- i. Truck movements associated with both routes (northbound and southbound) shall be limited to no more than three movements per hour between 05:00 and 07:00

Seriously, starting trucks from 5am, seven days per week, 365 days of the year, is completely removing any health and wellbeing care of residents, as stated above. Has no consideration been taken for noise factor involved with this?

30 minutes before sunset in summer:

Truck movements on the northbound route will occur between the period starting 30 minutes before sunrise and ending 30 minutes after sunset each day:

This means 30 minutes before sunrise, as an example is from 447am. It now has homeowners starting their day from 5am every single day of the year, and not finishing their day with peace and quiet, til after 10pm; which does not take into account the time to then relax, and settle, and finally fall asleep, to then be awoken once again, from 5am. And that is only the homeowners which live outside of the mining area and en route instead.

<b>Wed, Dec 13</b>	5:17:02 am	5:49:57 am	9:08:01 pm	9:40:55 pm	15:18:04	1:28:59 pm
--------------------	------------	------------	------------	------------	----------	------------

Sunset 9.17pm

<b>Thu, Jan 4</b>	5:29:29 am	6:02:11 am	9:17:09 pm	9:49:51 pm	15:14:58	1:39:40 pm
-------------------	------------	------------	------------	------------	----------	------------

Why would the Council ever believe this is of benefit to the community, by now having no peace and quiet, on any day.

No consideration has been taken into account of the communities wellbeing.

Taking into account TiGA want to mine 24 hours per day, seven days per week; would you, any council member, like to have a mining operation in their backyard, all day; all night.

Taking into their proposal of 19 vehicles per hour from 6am, seven days per week, means, every three minutes, from 6am, every single day, is a vehicle, not taking into the account of noise from trucks within this timeframe also.

It is unjust to expect the community, and rate payers, to have vehicles from 5am til 10pm, every single day. This is an extensive change to the district, and should have been part of the long-term plan in the district if the Council is to permit this.

Why would the Council think it okay for an overseas company to come into Barrytown, and disturb all of the community with such hours of disturbance, to not be making any money from it, and then expect the community to be fore this. We bought rural, to live a lifestyle, which suits the Coast. It has not taken into account how slow traffic is with tourist vehicles on the road, and how this will definitely create a backlog when slow drivers, or bad weather; nor has it taken into account roadworks and how long the delays will be with this extensive number of trucks and vehicles, nor road maintenance.

If mining was to be utilised in this area, it should have been in the thirty year plan of the District Council plan, giving ratepayers/homeowners the opportunity to sell up and move on before this went into effect. This is like putting a full city motorway at your front door overnight, with no account of health and well being to the homeowners; and therefore no opportunity to then sell if they chose to.

It is proposed only:

TiGA:

10. It is proposed to truck out 250,000 tonnes of material per year from the Site. This equates to an average of 25 truckloads of material per day<sup>2</sup>. This in turn equates to 50 truck and trailer movements per day (i.e. 25 arrivals plus 25 departures). The shortest day for trucking material on the northbound route is ten hours, which leads to five truck and trailer movements per hour on average at that time.

This does not LIMIT TiGA to anything; it simply is what they are proposing may happen, if this increases, we have no control of that also. They may increase trucks further still; They may propose to truck out 250,000 tonnes of material, but that does not limit them to this. Even at 250,000 tonnes, we now have no solace, peace and quiet, and wellbeing.

The Council has also not had independent testing on the site; only TiGa conducting site test of radiation. One sample, does not constitute a safe environment and I believe this is being missed greatly by the Council. Would you supply your worst sample or your best sample for submitting a permit, because I know, I'd be doing samples all over the proposed site; then once receiving those results, conducting a sample of my least radioactive to then send to the Australian [not NZ testing agency!] testing company to show how there is no radioactive substance to worry about.

Shouldn't the Council be demanding independent testing of the Council's choice of operator, and doing extensive testing of the ground, of many parts of the site; at TiGA's cost, to ensure the information of radioactive material is in fact correct, for all parts of the site; and future 5ha sites needing the same testing. This is a rural area, with a community, and school, within its boundaries.

The Site is zoned Rural in the District Plan and the proposed activity is understood to be Discretionary in the zone; if it is therefore discretionary, and the community at large, do not want it, then why is the Council not listening to us.

TRN - R12: High Trip generating transport activities Where: 1. This is the establishment of a new activity or the expansion of an existing activity listed in Table TRN 6 that complies with Standard TRN S14. Discretion is restricted to: a. Effects on the transport network; and b. Effects and recommendations to minimise effects from the transport assessment. Table TRN 6 (High Trip Generating Activities) permits less than 30 heavy vehicle movements per day from a mining activity. The proposal is of 50 heavy vehicle movements per day and therefore does not comply.

The community does not want this mine.

The Council is in the position to say no to this mining consent based on the health and wellbeing effect on the community.

It is in the position to say no to it being run 24 hours per day, seven days per week. This is not acceptable. Put yourself into this position, that now, across the road from you, is a mining operation running 24hours per day; no peace and quite. This is a rural area WITH A COMMUNITY; NOT A RURAL AREA WITH NO COMMUNITY AT ITS DOOR. Why does the Council not have the strength to stand up



for its community members and look out for them; rather than complying with an overseas business; or anybusiness, wanting to take that away from its community.

**Grey District Plan**

Noise: operating 24hours per day; seven days a week is against the Rural District Plan.

**Rural zone:**

Under Grey District Plan for rural:

Rural environmental Noise

7am to 10pm m-sat is 55dba L10; 55 decibels constant noise

10pm to 7am 45decibels any day

Sunday 45decibels

75decibels absolute maximum as one off sound

19.7 ITEM	PERMITTED	CONTROLLED
14. Subdivision	(i) Refer Appendix 5	(ii) Refer Appendix 5
15. Heritage Items & Historic Trees	(i) Refer Appendix 6	(ii) Refer Appendix 6
16. Non-Rural Activity	<p>(i) Non rural activities are permitted if:</p> <p>(a) The maximum floor area for any non-rural activity is a maximum of 100m<sup>2</sup> provided that this shall not apply to fire stations.</p> <p>(b) The maximum number of permitted vehicle trips generated by an activity on a site is:</p> <p>Heavy Vehicles 20 per day Other Vehicles 100 per day</p> <p>(c) Any activity shall be conducted such that the following noise limits are not exceeded at any point within the notional Boundary of any dwelling in the Rural or Rural Residential Environmental Area and at the boundary of a site in the Residential and Township environment areas, other than the site from which the noise is created.</p> <p>(i) Rural Environmental to Rural Environmental and Township Environmental</p> <p><b>Monday to Saturday</b> 0700 hrs to 2200 hrs 55dBA L10 2200 hrs to 0700 hrs 45dBA L10</p> <p><b>Sunday</b> 45dBA L10</p> <ul style="list-style-type: none"> <li>75 dBA Lmax all days between 2200 hrs and 0700 hrs and</li> </ul> <p>(ii) Rural Environmental to Residential Environmental and Rural-Residential Environment</p> <p><b>Monday – Friday</b> 2200 hrs to 0700 hrs 45dBA L10 0700 hrs to 2200 hrs 55dBA L10</p> <p><b>Saturday</b> 1700 hrs to 0800 hrs 45dBA L10 0800 hrs to 1700 hrs 55dBA L10</p> <p><b>Sundays</b> 45dBA L10</p> <ul style="list-style-type: none"> <li>75dBA Lmax all days between 2200 hrs and 0700 hrs</li> </ul> <p>Except where expressly provided elsewhere in this rule, sound shall be measured in accordance with the provisions of NZS 6801:1999 Acoustics Measurement of Environmental Sound and assessed in accordance with the provision of NZS 6802:1991 Assessment of Environmental Sound.</p>	(ii) Not applicable.

This cannot be in earshot of a dwelling operating at these levels.

DISCRETIONARY	ASSESSMENT CRITERIA	EXPLANATION
(iii) Refer Appendix 5	Refer Appendix 5	Refer Appendix 5
(iii) Refer Appendix 6	Refer Appendix 6	Refer Appendix 6
(iii) Any activity that contravenes a permitted condition is a discretionary activity.	<ul style="list-style-type: none"> <li>(i) The effects on <b>adjoining sites</b> in terms of visual impact and noise.</li> <li>(ii) The volume and type of traffic which may be generated to the <b>site</b> and the ability of the <b>site</b> to accommodate parking, loading, manoeuvring and <b>access</b> requirements.</li> <li>(iii) The effect on <b>adjoining</b> properties.</li> <li>(iv) The type of activities and the reason for it operating outside the specified hours.</li> <li>(v) The level and character of the noise, particularly at night.</li> <li>(vi) The proximity and type of <b>adjoining</b> uses such as dwellings.</li> <li>(vii) The reason for the additional generation.</li> <li>(viii) the ability to avoid, remedy or mitigate any adverse effects arising as a result of the extra generation.</li> <li>(ix) The proximity and type of <b>adjoining</b> uses.</li> <li>(x) The soundscape of the area.</li> </ul>	<p>Non-rural activities have the potential to detract from the amenities of the Rural Environment.</p> <p>Hours of operation of non-rural activities are restricted to ensure the quiet nature of settlement areas during night time hours is maintained and not disrupted by activities which operate for extended hours.</p> <p>Inappropriate levels of vehicle generation are not consistent with rural amenity and can detract from the level of existing amenity.</p> <p>The noise provision provides protection from unreasonable noise levels, particularly from non-rural activities.</p> <p>Fire stations are exempted from the rules relating to floor area, given the important service they provide to the community.</p>

19.7:

DISCRETIONARY	ASSESSMENT CRITERIA	EXPLANATION
(iii) Any activity that contravenes a permitted condition is a discretionary activity.	<ul style="list-style-type: none"> <li>(i) Effects on view.</li> <li>(ii) Visibility of activities</li> <li>(iii) Effect on indigenous flora and fauna</li> <li>(iv) Mitigation measures proposed.</li> </ul>	<p>Certain areas in the district have been identified as "Outstanding Landscape Area" which are sensitive to change. Accordingly, resource consent is required to assess these changes.</p>

I believe for the Council to accept this mining licence and permission to act as a mine in Barrytown, completely disregards the Rural District Plan, in particular with **hours of operation must be restricted to ensure the quiet nature of settlement areas during night time is not disrupted and maintained; as and not operated with extended hours; SEVEN DAYS PER WEEK, is disrupting the quiet nature of**

settlement, as is operating 24 hours per day. Inappropriate levels of vehicle generation also detracts from existing amenity.

Visual impact is also part of this legislation, and clearly will both impact on anyone driving the Coast Road; and also the community and residents.

\*\*\*

Puts Council in path of future litigation against the Council, if finding the ground testing was not extensive and ongoing, in finding radioactive material has causes health issues, in both the workers, and the community at large. With the area, being one of housing, and children within this housing network, it is a high risk to take, when one has not conducted independent testing, with no ties to TiGA.

The Council must conduct independent testing of the ground, making sure the samples taken are worthy of this process; and not simply TiGA submitting the least amount of radioactive substance as their sample. The Council cannot risk health implications on the community in the future.