Office Use Only

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



PART A: DESCRIPTION OF APPLICATION		
CONSENT NUMBER:	APPLICANT:	
WCRC: RC-2023-0046 GDC: LUN3154/23	TiGa Minerals and Metals Ltd	
DESCRIPTION OF PROPOSED	ACTIVITY:	
a mineral sands mine in an area of approximately 63ha over a 12-year period		
LOCATION:		J
Map reference NTZM: 1460770E, 50		
Legal description: Lot 1 DP 412689	and Rural Section 2847	
PART B: SUBMITTER DETA	NILS	
Full name/s		
	Marie Elizabeth Elder	
Postal address		
I am the owner/occupier		
(delete one) of the following		
property:		
Primary contact person/s		
Email address		
Phone number/s		n/a
		n/a
Signature:		Date:
		1
		13 Oct 2023
Name (BLOCK CAPITALS):		
MARIE ELDER		
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.		
, , , , , , , , , , , , , , , , , , , ,	•	(tick one)
I/we support the application	n numbers indicated by a tick on the back of this form	(ack one)
I/we oppose the application	2 TARROWN S. COOK 1907 TOWN THE TARROWN SOLVEN STATEMENT	ĭ
I/we neither support nor oppose the application		
If we neither support nor t	уррозе иле аррисацоп	

(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 nearing 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		
/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)		
Please see separate pdf document for detail: Marie Elder TiGa submission Oppose		
I/we seek the following decision from the Local Authority:(give precise details)		
I seek that the applications be DECLINED in their entirety		

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.



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SUBMISSION by Marie Elder opposing TiGa Resource Consent applications

I request that the applications by TiGa Minerals & Metals be **DECLINED** in their entirety.

Background

My partner and I invested in land at Punakaiki in 1994, built our house a few years later and have lived here permanently for fifteen years. We were drawn by the beauty of the physical landscape and an opportunity to live in a peaceful place where the natural environment takes precedence. We often happily tell visitors the Coast Road must be 'the best drive to the supermarket in the world'.

I am active in the local community, including as Punakaiki Civil Defence co-coördinator, leader of the Truman Track predator trapping team since 2017, secretary to the Barrytown School Board of Trustees and elected community representative on the Dolomite Point Redevelopment Project.

I am making this submission entirely in my personal capacity as a local resident.

Introduction

My main reasons for opposing the applications by TiGa Minerals and Metals are the significant i.e. more than minor, adverse effects on:

- Amenity values and community wellbeing
- State Highway Six and the environment [from trucking]
- The Westland petrel / tāiko
- Carbon emissions and climate change

I am also concerned by the number and nature of Conditions suggested by the applicant.

Amenity Values and Community Wellbeing

- 1. This mining proposal would I believe have a more than minor adverse effect on natural amenity values and community wellbeing.
- 2. Almost everyone I know in this locale articulates that the key reasons they chose to settle or stay here are the attractiveness of the physical landscape, the native birdlife, the quiet roads, the peaceful lifestyle, the relative isolation. Many are making a living, directly or indirectly, from the visitors who are attracted here for similar reasons.
- 3. I find the notion of open-cast mining right next to a scenic highway, with 24/7 processing and dozens of mining trucks day in day out, 17 hours a day without respite, unconscionable. I know this abhorrence is shared by many in the Coast Road communities, and whenever I speak of the mining proposal to visitors, they say something like "Surely not" or "But that wouldn't ever be allowed in a place like this ... would it?"
- 4. Discouragement of visitors, whether it be from trucks or the ugliness of an opencast mine, would have a significant detrimental effect on the economic wellbeing of all those who have crafted livelihoods dependent on visitors. And tourism, especially nature tourism, provides a sustainable economic future for present and next generation Coasters, unlike the 'boom & bust' of mining.
- 5. It is not just visitor numbers that would be affected: I am already aware of people who were considering the investment of coming to live on the Coast but who have backed out on hearing of the mining proposal, because it is antithetical to how they imagine or know life on the Coast to be. Others who have bought, being unaware of the mining plan, express regret.

- 6. Such a disinclination to invest here is likely to lead to reduced property values and difficulties in selling if potential buyers are dissuaded by the proximity to mining and intensive trucking. So, for people whose changed circumstances mean they need to sell, this will add the stress of economic uncertainty, an adverse effect on community wellbeing.
- 7. TiGa make ambitious promises of increased wealth for the region but show little if any cognisance of the existing local economy. They pull out the old saw of a region where jobs are "traditionally hard to come by" but it's rather more useful to look at the current situation on the Coast: low unemployment and businesses crying out for staff. I believe TiGa, acting in their own and their shareholders' interests, are offering a solution to a problem which doesn't exist.
- 8. The applicant's disconcerting vagueness about the actual trucking route whether to the north or south of the proposed mine site only adds to community uncertainty and anxiety around the proposal. This gap in the applicant's business plan, along with their lack of any track record in such mining, also diminishes confidence in their big promises of economic benefit.
- 9. We are learning more and more about community wellbeing, and how it centres around connectedness. And for this connection to be sustained, Coast Road communities need a safe, usable, SH6.

State Highway Six and the environment: adverse effects of trucking

- 10. I oppose the application because of the significant adverse effects of proposed trucking on the environment and on community wellbeing.
- 11. The fragile, high maintenance part of State Highway Six [SH6] known as the Coast Road copes at great expense to Waka Kotahi, but copes with its current combined roles of scenic highway, linear supply route and community lifeline. These are functions intrinsically interwoven in this region where so many livelihoods are connected to tourism.
- 12. It is not suitable for any attempt to additionally use it as a mining haulage route.
- 13. A significant increase and it is significant in heavy truck and trailer units such as TiGa propose on an already vulnerable and damaged road [for example, single lane at Meybille Bay and slumping at 13 Mile] will undoubtedly result in more damage.
- 14. This in turn is likely to lead to more road closures or partial closures, affecting us all as we endeavour to go about our business and social lives, and access supplies, medical help, education, everything.
- 15. On top of damage to the road surface and structure, the safety of SH6 for all other users: locals, visitors, children on school bus runs, business people, other truck drivers, would be compromised by both meeting and following these dozens of heavy truck and trailer units. I'm starting to dread that drive to the supermarket.
- 16. TiGa in their application refer to a 'maximum average' of 50 trucks per day. On the West Coast Regional Council public notification page, the description of the Proposed Activity cites a 'minimum average' of 50 truck movements a day. Does that mean at least 50? I am unsure what is meant by either of these 'averages' and would not like to think Council is paving the way for a number more than 50 as part of the public notification and consent process. Perhaps it is a typo.
- 17. The effect on the environment of carbon emissions from the trucking is something on which the applicant is silent.

The Westland petrel / tāiko

- 18. There is the potential for cumulative adverse effects on the tāiko population. Their particularly slow reproductive rate means even a few tāiko deaths can have a significant adverse effect on the breeding potential of this already threatened species.
- 19. TiGa claim to be avoiding or mitigating effects of headlights on the tāiko. However, 5am to 10pm still includes hours of darkness. And northbound trucking hours 'restricted to' 30 minutes before sunrise until 30 minutes after sunset would not mitigate threats to the petrels, as vehicles on this stretch frequently need headlights during these times.
- 20. The proposed onsite activities of mining, loadout, and processing include operating during darkness all year round. Whatever way the lights are angled, they will shine 24/7 in what is otherwise a dark night-time landscape, and so are likely to confuse the petrels.
- 21. We have seen the devastation to the tāiko colony of the 2014 Cyclone Ita, thought to have destroyed hundreds of burrows, and climate change will undoubtedly bring more extreme weather events. We need to do all we can to prevent further stress on the colony.

Carbon Emissions and Climate Change

- 22. I oppose the application because it would add significant carbon emissions to the environment, exacerbating the already adverse effects of climate change.
- 23. Aotearoa New Zealand is in a government-declared climate crisis, and yet here we are contemplating a new industry which is emission intensive, reliant as it is on diesel-fuelled trucking and the heavy machinery of open cast mining operations.
- 24. The applicant proposes to lower the overall land elevation of an already low-lying site by 1.2m. It is hard to believe this would not exacerbate coastal erosion and seawater incursion.
- 25. We are unable to gauge the full extent of adverse effects as the application has no emissions report.

Too many conditions

26. The applicant's suggestion of a multitude of conditions and requirements appears to actually be an acknowledgement, possibly unintentional, of the degree and number of difficulties with this proposal. It stretches credulity to believe our Councils would, assuming they had the will, have the capacity to monitor and enforce compliance of all these conditions and requirements. And so there would be a high level of risk to the environment, and to the community, of non-compliance.

CONCLUSION

- 27. The world may need these minerals, and there may be a market for them, but for the reasons given I believe that for this particular location this is a highly inappropriate and unsuitable proposal.
- 28. I request consent be DECLINED

Marie Elder

Punakaiki, 13 October 2023