

**From:** [Antony Alford](#)  
**To:** [GDC Planning \(Resource Consents\)](#)  
**Cc:** [info@tigamm.co.nz](mailto:info@tigamm.co.nz)  
**Subject:** SUBMISSION ON AN APPLICATION FOR RESOURCE CONSENT  
**Date:** Wednesday, 4 October 2023 2:41:49 pm

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

[REDACTED]

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

[REDACTED]

Full name/s: Antony Alford

Postal Address: [REDACTED]

I am the owner of the following property: [REDACTED]

Primary contact person: Self

Email address: [REDACTED]

Phone numbers: [REDACTED]

Date: 3/10/23

Name (BLOCK CAPITALS): ANTONY ALFORD

I oppose the application

I wish to be heard in support of my submission.

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

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 COPY

\*I have served a copy of my submission on the Applicant as per Section 96(6)(b) of the RMA'. - YES

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

I request, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application in 1 or more hearings to commissioners who are not members of the local authority, given the possible financial involvement in the mining proposal of some such members whose conflict of interest would presumably preclude their appointment, but who might exert influence on their colleagues in such a role.



#### 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.

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.wcrc.govt.nz](http://www.wcrc.govt.nz)

Grey District Council 105 Tainui Street PO Box 382 Greymouth, 7840, [planning@greydc.govt.nz](mailto:planning@greydc.govt.nz) 03 769 8600

#### Note to submitter

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 on the following grounds.

There are aspects in it that purport to have been independently assessed which are dubiously independent of mining interests. For example radioactivity hazard assessment by IHC, a mining company who's website states 'We have a proven track record in solutions for mineral sands, . . . '.

There are other assessments that seem at best superficial, and at worst misleading. The Integrated Transport Assessment provided by Novo Group is an example. Regarding the effects of the proposed additional 50 truck and trailer movements during daylight hours, it has this to say about the suitability of SH6:

' . . .there is ample capacity to accommodate the traffic generated by the proposed activity without any noticeable change to the safe or efficient operation of SH6.'

It goes on to justify this assertion:

'From a traffic capacity perspective, a road of SH6's characteristics could accommodate in the order of 1,620 vehicles per hour (ref 5).'

The reference is to an Austroads publication 'Guide to Traffic Management Part 3: Transport Studies and Analysis Methods'. (Austroads 'is the association of the Australian and New Zealand transport agencies, representing all levels of government.')

As the title suggests, this is an academic publication providing the background to a model for prediction of traffic flow and capacity in broadly generalisable circumstances. The quoted figure of 1620 vehicles per hour is constructed from this model with only two general modifiers to a baseline of 1800 for an ideal two lane highway, reflecting variables that might more appropriately be applied to SH1 between Oamaru and Dunedin.

The Novo Group report has only one photo of SH6 showing the long straight at the proposed access site. Under 'Transport Environment' the report only looks at this uncharacteristic section of SH6, making no mention of the more relevant and extensive proportion of the proposed routes with characteristics clearly less favourable to traffic capacity and road safety. These should have included:

Long stretches of winding road (eg Whitehorse to Punakaiki) preventing safe overtaking, no verges, a one way bridge (Ten Mile) and frequent slips resulting in further single lane traffic or road closure,

Frequency of residences having very poor egress on to SH6, (ie much less than the stipulated 200m visibility in both directions),

Gradients that result in significant slowing of heavy vehicles and camper vans,

Frequency of cyclists touring the Coast road.

No reference is made to the Austroads publication 'Guide to Traffic Management Part 4: Network Management Strategies'.

In the introduction to it's Traffic Management publications, Austroads states that with regard to Part 4,

'Road safety, in particular, is treated as an overarching value in this part and should be considered at every step with every network management proposal tested against road safety outcomes'

Nor is there reference to Part 12: Traffic Impacts of Developments, which 'will also help road agencies and others to check and respond to reports on traffic impact assessments . . .', including 'large single site or single use commercial developments (including mines . . .)'.

No effort has been made to conform to section 4.4.9 'Review Limits of Area Affected'

1. Check to see whether the limits of the area affected need to be altered.
2. If so, make the changes and carry out further analysis.

Pedestrian or cycling issues may need to be assessed over a greater area.

Nothing in the report addresses section 4.4.10: 'Rural roads':

Aspects that may require consideration include the effect of additional traffic and access treatments on:

-overtaking opportunities

-speed differentials and reduction in level of service where significant heavy vehicle movements occur

-inadequate sight lines due to crests, curves or dips (may be critical for safe heavy vehicle operations)

-noise for adjoining properties.

In the commentary section C 1.1 that concludes Part 12: 'Traffic Impacts of Developments' is this statement;

(A Traffic Assessment should . . .) ' consider all parts of the transport network where the development movement would be likely to have a material impact' .

I contend that the 'Integrated Transport Assessment' put forward in support of the TIGA Mineral Sands Mine application is totally inadequate by the standards of the authority selectively quoted in the submission (Austroads).

It seems highly likely that other sections of the application also fall far short of balance and accuracy once examined in detail given the clearly inappropriate choice of 'independent' assessors such as other mining concerns.

I would also ask the commissioners to consider the implications of consenting a development whose commercial success will rely entirely on the maintenance of road transport in an area likely to be severely compromised for a long time in the event of a Main Divide earthquake, which in current geoscience projections is given a 75% chance of occurring within the next 50 years, with an 82% likelihood of being greater than magnitude 8. The only reflection of this 'elephant in the room' for the whole region is the analysis of likely effects on the integrity of the mining site.

I seek the following decision from the Local Authority: that the application be declined in its entirety.