

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

**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: Suzanne Hills

Postal address: [REDACTED]

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

Primary contact person/s: as above

Email address: [REDACTED]

Phone numbers:

Home:

Mobile: [REDACTED]

Business:

Signature of the submitter (or person authorised to sign on behalf of the submitter):  
Suzanne Hills

Date: 9 October 2023

Name (BLOCK CAPITALS): SUZANNE HILLS

*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 **oppose** the application

I **wish to be heard** in support of my/our 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. **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: **Hard (paper) copy**

I **will** serve a copy of my submission on the Applicant as per Section 96(6)(b) of the RMA

**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 to 1 or more hearings commissioners who are not members of the local authority.

### **Submission**

#### ***General comments***

1. The proposed site and mine haulage route is in a rural residential area and is not suitable for an industrial operation of this scale and intensity. SH6 is the only coastal transport and infrastructure route between Westport and Greymouth, and consequently a long thin settlement has developed along it. Hundreds of people live along the 102km route and the proposal's more than minor adverse effects would be widely distributed.
2. I strongly disagree with any claim that the proposal enables people and communities to provide for their social, economic and cultural wellbeing and for their health & safety. It would have the opposite result of degrading values, and creating more than minor health & safety risks.

#### ***Economic wellbeing adverse effects***

3. The claimed economic wellbeing benefits of the proposal come with uncertainties. Community wellbeing and environmental values should not be compromised in the pursuit of speculative economics. Failed West Coast mining proposals of recent years should serve as examples, e.g. the Escarpment Mine Project was granted on the basis of its enormous financial benefit, yet the operation was suspended after only 2 years because production at the site was uneconomic.
4. The proposal would degrade economic wellbeing values. Along with myself, many residents in this area seek meaningful, impactful work, and value the natural environment above industrial development. Gen Y and Z seek jobs in impact-led businesses aligned with environmental and social sustainability goals, including a safe climate; not employment in an enterprise without a social licence to operate and one creating new greenhouse gas emissions.

#### ***Opportunity cost***

5. The mining proposal has an opportunity cost of coastal lowland restoration to achieve urgent climate, biodiversity and freshwater goals, and to advance the nature economy - to support and enhance Te Tai Poutini/the West Coast's greatest asset, the natural environment, whilst offering a longevity of benefits to present and future generations.

### ***Climate change adverse effects***

6. The proposal is greenhouse gas emission intensive and would have adverse effects on climate change from diesel fuelled trucking and mining machinery, and from likely fly-in fly-out staff.
7. Carbon emissions from the proposal would generate more than minor effects during a government declared climate crisis, contributing to the myriad of adverse effects from global warming.
8. The application lacks an emissions report, and this critical lack of information means the proposal cannot be measured against the climate change provisions of the RMA Amendment Act 2020 and the Climate Change Response [Zero Carbon] Amendment Act.
9. The application is in opposition to targets and actions of the statutory Emission Reduction Plan, in particular to reduce emissions from freight transport by 35% by 2035 and provide new jobs in low-emissions industries.
10. The proposed mining would reduce the average land elevation by 1.2m, potentially exacerbating climate impacts of coastal erosion and seawater incursion into groundwater from sea level rise and storm surges in a warming climate.

### ***Cycling safety adverse effects***

11. I am a cyclist and travel approximately 2000km p.a. on my ebike, the vast majority of which is along the Coast Road of SH6. As most of the Coast Road lacks a road shoulder, trucks and larger vehicles cannot safely overtake cyclists without crossing the centre line. They regularly do so illegally on solid yellow lines, risking head on collisions. It is unusual for trucks to slow down and wait for a section of road where they can pass legally and safely – campervans and cars often do, but rarely commercial vehicles. Put another 50 trucks per day on this section of the Coast Road and a serious accident or fatality is inevitable – in short, this proposal will cost lives.
12. There are currently only very short and disjointed sections of cycleways along the proposed mine haulage routes to Westport and Greymouth, leaving cyclists with no alternative but to use SH6. For many, TiGa's proposal will create a Coast Road simply too dangerous to cycle. The loss of cycling's positive benefits would have negative impacts on local people's health and wellbeing, and their emissions reduction. It would also have significant adverse effects on a burgeoning cycle tourism industry.

### ***Wellbeing adverse effects***

13. The proposal would create adverse wellbeing effects of dust, trucking noise, and light pollution in an otherwise dark environment. The measures in the dust management plan would be ineffective in severe easterly wind events that occur frequently on the Barrytown Flats.

14. Significant adverse effects on residents' wellbeing would result in the devaluation of properties and difficulties selling as potential buyers are dissuaded by proximity to mining and trucking.

#### ***Amenity adverse effects***

15. Current amenity values are high and draw many visitors and residents to the area. The industrial mine and the significant built infrastructure of the proposal, including a L-shaped building 72m x 24m and 40m x 22m and up to 15m high, would degrade the natural character of the coastal environment. The social fabric of the community would be impacted by using SH6 as a mine haulage route, and the presence of an industrial mine operating within 200m of mean high water would degrade beach-front and lagoon-side recreational values.

#### ***Adverse effects of trucking and use of SH6 as a mine haulage route***

16. The Coast Road under this proposal would become a mine haulage route, effectively part of the mine's operation. It is entirely unsuitable for heavy trucking at the intensity and scale of this industrial activity. The road is already fragile, vulnerable and easily damaged; the risk of damage from a significant increase in trucking is very high. Waka Kotahi already struggles to maintain the highway, with frequent partial or full road closures. The likelihood of the significant increase in heavy vehicles contributing to road closures is very high and consequently wellbeing and livelihoods would be impacted.
17. The proposal would create adverse safety effects on users of the highway. SH6 is already a dangerous road with truck & trailers needing to cross the centre line to navigate tight, blind, often climbing corners. The heavy truck movements at the scale proposed would add significant added risk to: navigating residential driveways; school bus runs between Greymouth and Westport; cyclists, pedestrians, and motorists, including tourists in the busy peak holiday times.
18. Trucking noise & vibration would create stress and potential sleep loss for hundreds of people living along SH6 – from early hours, all day and after dark, 7 days a week, and without respite on weekends and public holidays.
19. The cost of repairing damage to SH6 from the increase in heavy truck movements could be significantly more than the applicant's contribution to the transport fund. The fund is already under severe pressure, and likely will need to be topped up from general taxation, further reducing the actual economic benefits of the proposal.

#### ***Adverse effects on the Westland petrel***

20. There is the potential for unacceptable cumulative effects on the Westland petrel population. The species is already on a knife edge with multiple threats on land and at sea and the inherent vulnerabilities of its sole breeding location. The notably slow reproductive rate means even a few deaths can have a significant effect on the breeding potential. The proposed night time mining, loadout and trucking operations present light distraction threats and the adverse effects of potential injuries and mortalities. This is inconsistent with

the requirement of Policy 11(a) of the New Zealand Coastal Policy Statement (NZCPS) to avoid adverse effects on threatened or at-risk indigenous species and their habitats in the coastal environment. The Westland petrel breeding ground is a functioning seabird forest and sadly represents the last of its kind on mainland Aotearoa. Collectively we have a responsibility to help this very special and unique species; not add yet another threat to its already vulnerable status.

21. Climate change and the recent Tasman Sea marine heatwaves affect the abundance and distribution of Westland petrel food sources and may impact breeding success. A warming climate also increases the risk of cyclones making landfall on the West Coast. In 2014, Cyclone Ita caused slips and is thought to have destroyed hundreds of petrel burrows. The proposal would add new emissions, contributing to the adverse effects of global warming on the Westland petrel.

#### ***Adverse effects on indigenous biodiversity***

22. I oppose the application due to adverse effects on indigenous flora and fauna and their habitats in the coastal environment. The proposed site and the one adjacent to it form one of the best remaining coastal lowland habitats on the Barrytown Flats – wetlands, coastal lagoons, creeks and re-generating kahikatea forests. The area provides critical connectivity to other remnant habitats and the forested Paparoa range. Mining is proposed within 20m of wetlands and coastal lagoons, including a SNA, all of which are important habitats for threatened and at-risk indigenous species. Avifauna would be affected by noise, lighting, vibration, human activities and vehicle movements near their habitats, particularly during the breeding season. The proposed management activities and the 20m buffer are not sufficient to avoid adverse effects. An example is the threatened matuku/Australasian bittern which can be expected to seek to avoid noise.
23. The proposal is inconsistent with the requirement of Policy 11(a) of the New Zealand Coastal Policy Statement (NZCPS) to avoid adverse effects on threatened or at-risk indigenous species and their habitats.
24. Together with my partner, I hold title to a QEII conservation covenant in the Paparoa foothills, east of the proposed site. This is part of the critical connectivity link between the marine area, coastal lagoons and regenerating forests up to the Paparoa ranges.

#### ***Adverse effects on the area's hydrology and waterways***

25. I oppose the application due to adverse effects on the area's hydrology and waterways given the complexity of the hydrology in a high rainfall zone. I am particularly concerned that the proposed mining may result in heavy metals being leached from the disturbed sub-soils, mineral sands and mine waste backfill on exposure to rainwater and air, and cause heavy metal contamination of the coastal lagoons, wetlands, and freshwater springs.

#### ***Radiation adverse effects***

26. There is the potential for adverse effects of radiation on people and the environment. The level of risk is unknown due to inadequate information. Additionally, New Zealand lacks a

code of practice for managing radiation safety in the mining industry and TiGa's proposal to use the Australian Code of Practice is inappropriate for NZ conditions.

### ***Proposed consent conditions***

27. Grey District Council raised concerns with the applicant over the approximately 110 consent conditions proposed to manage the actual and potential effects, with many more sub-conditions and also requirements to comply with management plans. Council noted this will create a very large and complex operation to manage from a compliance perspective, and questioned whether the local authorities have the existing resources to manage the compliance requirements. This Council acknowledgement highlights both the risk of multiple non-compliance from the proposed operation, and the potential for the burden of complaint to fall on the community.

### ***Statutory Framework***

28. The proposal is contrary to s6(a) of the RMA and policies 13-15 of the NZCPS. It does not provide for the preservation of the natural character of the coastal environment, wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development. The area's natural character values are recognised by the Outstanding Natural Landscapes of Paparoa Ranges West (ONL42 & ONL44), Outstanding Coastal Natural Character of the Paparoa Foothills (NCA40) and High Coastal Natural Character of Pakiroa Beach (NCA41) in the proposed district plan, all of which fall entirely or partly within the plan's delineated coastal environment.

29. The proposal is contrary to the Resource Management (National Environmental Standards for Freshwater) Regulations 2020. The proposal is to mine within 100m of wetlands. There is not a functional need to mine in the proposed location, nor will the extraction of minerals provide significant national or regional benefits. Therefore, under 45D(6) of the National Environmental Standards for Freshwater, consent cannot be granted.

30. The proposal is contrary to the Resource Management Act, and many national, regional and district level objectives and policies designed to protect the environment.

### ***AF8***

31. The West Coast faces a 75% probability of an alpine fault earthquake occurring in the next 50 years, with a 4 out of 5 chance it will be a magnitude 8+ event. Industrial development on this scale risks exacerbating adverse effects following a catastrophic earthquake or coastal-inundation event. Over the 12 year consent term, this is an approximate probability of 18% and cannot be defined as a "very low likelihood of a catastrophic event" as stated in the applicant's geotechnical report.

### ***Relief sought***

I seek that all resource consent applications for the proposed establishment and operation of a mineral sands mine, including construction of associated infrastructure, on the Barrytown Flats are refused.

Thank you for the opportunity to submit.