

**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

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	Beachstones Partnership T/A Sunset Views Accommodation			
Postal address	[REDACTED]			
I am the owner of the following property:	[REDACTED]			
Primary contact person/s	Tammy Ward			
Email address	[REDACTED]			
Phone number/s	Home:	N/A	Business:	N/A
	Mobile:	[REDACTED]	Fax:	N/A

Signature:		Date:	13 October 2023
Name (BLOCK CAPITALS):	TAMMY WARD		

*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/
- I **oppose** the application
- I/we **neither support nor oppose** the application

(tick one)

(tick one)

I **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 **have** served a copy of my 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)

We strongly **OPPOSE** the application and have attached our reasoning in a separate document.

We recommend this application be heard by independent commissioners rather than Council.

I/we seek the following decision from the Local Authority:(give precise details)

That the application be **DECLINED** in its 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.



**THE WEST COAST**  
REGIONAL COUNCIL

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Beachstones Partnership T/A Sunset Views Accommodation, make the following submission against the above resource consent application.

**1. I/We oppose the application due to adverse effects on the value of West Coast tourism, and its marketing.**

We operate a small tourist accommodation business which caters mostly to overseas visitors but also to many New Zealanders. Visitors come here to enjoy the 'Untamed Natural Wilderness' that the West Coast Regional Council so proudly promotes as one of our most valuable natural assets.

This mining proposal is smack in the middle of one of the most iconic and beautiful stretches of coastline in the world. Lonely Planet has the Great Coast Road as #2 on its list of most amazing road trips (April 2021) being singled out for its 'epic wilderness'. People come here every year to see the rugged beauty that is one of New Zealand's greatest natural environments, and adding an industrial activity such as this will destroy that tourism reputation. Even though the Applicant states they will bund the highway so the mine can't be seen, the fact that everyone will know there is a large-scale mining operation on the other side of the bund will detract from green landscape people have come to enjoy.

We promote the tourist activities in the area to my guests, such as the Paparoa Track, Croesus Track, Pancake Rocks and Petrel Tours. You would not be able to do any of these activities without seeing the mine. If you are on the tracks, you will no longer look down through the beautiful bush to see lush green pastures before your eyes meet the sea. You will be struck by the ugly pit in the ground which I am certain will make a lasting impression on many for all the wrong reasons. The constant drone of heavy equipment will reverberate off the hills and become an unwelcome distraction of background noise to an otherwise quiet area. We have already had comments from guests to say that they heard about the mining proposal, and they hope it does not happen as it would spoil a beautiful area of the coast.

Tourism provides ample employment opportunities and is an essential part of the flourishing economy of the West Coast. Visitor numbers were up 28% in the year to June 2023 and this next year is expected to be even better. Nature tourism and innovative low emission business development offer the most sustainable future for the West Coast. The applicant has chosen to assess economic values on pre-covid figures which is wildly inaccurate now.

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We sell this area to customers as being a beautiful, peaceful serene area to come and relax. Or to explore the many outdoor activities we have available, to walk the endless miles of beach and enjoy the vast array of birdlife around the lagoons. We have many comments from guests about how quiet it is and the stunning beauty that is here. These are some of the same reasons we came to live here.

Those comments would certainly change with the major jump in truck movements along SH6. While I appreciate the highway can be used by trucks, and to be clear I am referring to large haulage trucks, the current volume of them is low. The noise generated by these trucks can easily be heard at our house. At the moment, we get 2 milk tankers a day. Not bad considering how many dairy farms there are here but I can't imagine listening to 50 trucks a day, 7 days a week. That is a huge jump in numbers for a small community to just accept.

Local tourism is likely to be adversely affected by the mining activities and accommodation businesses along the route will suffer from the increased heavy traffic movements and associated noise and vibrations. This mining proposal goes against everything that the West Coast offers to visitors and everything that local operators are providing.

**2. I/We oppose the application due to adverse social and environmental costs outweighing any short-term economic wellbeing benefits.**

The proposal claims to be able to provide huge value to the local community by way of 57 directly employed jobs and 80 support jobs elsewhere in the economy and claim that the majority of these are likely to be filled by local or regional residents. There are no guarantees that TiGA will make this happen, in fact, after speaking with the project Manager Mr John Berry at a public drop-in session, he confirmed that while there are 57 positions, it's not likely they will need them all on site or that they can all be filled by local residents.

Some of the roles require highly skilled people which may not be available in New Zealand. This would be a common scenario for a mining operation, the key people they need (and probably the highest wage earners) would be 'fly in and fly out'. I don't understand how this sort of 'transient' employee will greatly benefit our local economy.

Regulation 45D(6) of the National Environmental Standards for Freshwater Management 2020 (NESFW) – Extraction of minerals and ancillary activities, states the following:

*A resource consent for a discretionary activity under this regulation must not be granted unless the consent authority has first—*

*(a)*

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*satisfied itself that the extraction of the minerals will provide significant national or regional benefits; and*

*(b)*

*satisfied itself that there is a functional need for the extraction of minerals and ancillary activities in that location; and*

*(c)*

*applied the effects management hierarchy*

We do not believe that the application comes anywhere close to satisfying part (a) of this regulation. A huge part of the financial forecast is based on them having a Minerals Separation Plant (MSP). This plant would be to further refine the minerals and would greatly increase the export value, however this plant is not part of this application. So it stands to reason that the numbers they are claiming to make this mine viable for the long term (and comply with Reg 45D(6)), don't stack up unless they have the additional processing plant.

They have provided an economic report which does not appear to have any unbiased opinions in it, but rather just parrots the words already forced upon us by the mining company. It also appears the information is being compared against Australian information which surely does not reflect the same in NZ.

TiGA are largely operated by overseas investors which means the vast majority of money will go offshore and will not be used for the benefit of the local economy. They are saying one thing, only to do another. They have stated repeatedly to us that they are only doing this one 64-hectare parcel. If that is the case, then this is destruction of a beautiful area of the coast for a very short-term gain. We do not believe that 5 years mining for \$63m is sufficient financial gain to satisfy Reg 45D(6) and that the adverse effects of this would far outweigh the earnings.

The claimed economic wellbeing benefits of the proposal come with plenty of uncertainty. Our community's wellbeing and the environmental values should not be compromised by this companies' pursuit of speculative economics. Further investigation into this company's background, financial standings and economic predictions should be undertaken prior to any consent being granted.

**3. I/We oppose the application due to adverse effects both on and of climate change.**

This proposal is emissions intensive. The application states they will be using diesel fuelled dump trucks, bull dozers, graders, front end loaders and generators. How can all of this equipment possibly be measured against the Climate Change Response (Zero Carbon) Amendment Act when the application does not even have an emissions report.

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This proposal will surely cause more than minor emissions effects and is in direct contrast to NZ's targets for emissions reductions. The plant list of diesel heavy equipment is as follows: 80 tonne excavator x 2, Diesel Generator (enclosed) x 2, 20 tonne bulldozer x 2, 16 tonne grader x 1, 20 tonne wheeled front end loader x 7 and 40 tonne dump truck drive-by (average) x 3.

All of this, operating 24/7, 365 days a year cannot possibly comply with emissions reduction. This doesn't even include the 100's of traffic movements a day for staff.

Barrytown is our home, and we did not move here with the intention of living in an industrial area. This township is rural and enjoys the amenity benefits of being rural, ie peaceful quiet surrounds, dark starry nights, vast open spaces with stunning landscapes and a close knit community who strive to be environmentally aware.

We appreciate there is a need for some materials to be mined, but this mine is NOT being proposed in an appropriate area. This area is rich with restorative coastal lowland opportunities, indigenous flora and fauna and coastal lagoons that support a vast array of birds and other aquatic life. The application noted at least 10 species within or near the application site that are at risk or threatened. This proposal would certainly worsen their chances of survival and is completely inconsistent with the New Zealand Coastal Policy Statement (Policy 11) which is to avoid adverse effects on threatened or at-risk indigenous species and their habitats. We need to continue to restore the coastal lowlands, not dig them up for overseas profits.

We request that this application be **declined** in its entirety. We also request that truly independent commissioners be appointed to carry out a hearing and make a decision.