

IN THE MATTER of the Resource Management Act 1991

AND
IN THE MATTER of an application for resource consents by
TIGA MINERALS AND METALS LTD

AND
IN THE MATTER of a submission by the
COAST ROAD RESILIENCE GROUP INC

Lay witness statement of evidence of Katherine [Laksmi] Crick
for COAST ROAD RESILIENCE GROUP INC

Topic: Amenity, natural character & landscape, and social well-being

Dated: 29 January 2024



Coast Road Resilience Group Inc

coastroadrg@gmail.com

Introduction

1. My full name is Katherine Crick. I have a BA in Sociology (Victoria University of Wellington, 1990). My partner and I invested and bought a property in Barrytown over three years ago to retire, live amongst and enjoy the natural surroundings. Prior to this, we lived in the Motueka area where I worked in the Mental Health and Health and Disability sector. My local roles include chairperson of Coast Road Resilience Group and secretary of Coast Road Dawn Chorus predator trapping group.

2. I became involved in local issues following the Barrytown Joint Ventures application, after becoming aware of the extent of local concern about mining on the Barrytown Flats and learning about the TiGa application; listening and talking with locals. We live approximately 4 kms away from the mine site, along the proposed haulage route.

3. I am not an expert and have been asked by the Coast Road Resilience Group to provide lay witness evidence in relation to amenity values, natural character and landscape, and social well-being. This report is not intended as expert evidence.

4. I am a member of the Coast Road Resilience Group Inc. (CRRG). I have prepared this statement of evidence for the CRRG in relation to this application.

5. In preparing this statement of evidence, I have reviewed the following documents:

- The submissions
- Relevant sections of the RMA
- Grey District Plan and Te Tai o Poutini Proposed Plan (TTPP)
- s42A Council reports
- TiGA RC Application AEE Final
- The applicant's:
 - Landscape Assessment
 - Site Plan
 - Processing Plant Building Plans
 - Rehabilitation Management Plan
 - Proposed Conditions of Consent
 - Graphic Supplement
 - Economic Assessment
 - Acoustic Assessments
 - Palaris Final Landform report
 - the Landscape Peer Review
 - the Landscape Report in Response to Submissions
 - Landscape Desktop review
 - Economic Peer Review
 - Noise Review

6. In addition to providing this statement in support of the CRRG, I also lodged a personal submission in relation to the TiGA Minerals and Metals Ltd application.

Scope of Evidence

7. This evidence focusses on the following matters: Amenity, Natural Character and Landscape and Social Wellbeing. Other CRRG members and expert witnesses will be providing evidence on other aspects of the application.

Summary

9. The natural character of the area would be significantly impacted by the proposed industrial operation. The proposal should not be considered in landscape isolation as if it were not part of the wider context in which it sits. The Barrytown Flats and Coast Road is not an industrial setting, and the proposed intensive industrial activity would have a significant impact on the area's natural character and natural landscape.
10. Seen as a whole, the Barrytown Flats and the Coast Road within the wider highly natural landscapes and seascapes are remarkable, memorable and noteworthy. The proposed industrial operation would be intrusive and inappropriate for the area and would threaten the existing natural character and amenity values.
11. Natural character forms a highly relevant factor contributing to the Barrytown Flats and Coast Road amenity values and in turn social well-being; as such many of the paragraphs in this statement overlap on matters of natural landscape, natural character, amenity values and social well-being.
12. An industrial operation of this magnitude would be the first of its type for the area and a new intrusion into the landscape and soundscape. The scale of the increase in traffic and heavy trucking would degrade social well-being and would impact community connectivity which requires a safe and usable SH6 as the area's only transport route. As there are numerous and growing lifestyle blocks and residential settlements along the proposed mine haulage routes, there would be significant and widely distributed adverse effects on the community.
13. There are concerns regarding adverse effects of an industrial development on local amenity values. Current amenity values are high and have drawn many residents to the Barrytown Flats coastal environment. Amenity values would be degraded by industrial infrastructure, lights, noise and activity, potential for dust and disruption of visual landscapes. The proposal's significant built infrastructure and mining activity would degrade aesthetic coherence, including visual and acoustic connectivity between ocean, farmland, and the natural forest and wetland mosaic, and the bush-clad hillside; dark sky; sweeping views and the natural character, natural landscape and natural features of the coastal environment.
14. There would be effects of increased stress on people due to loss of amenity and reduced naturalness; increased safety risks on SH6; increased traffic noise; potential sleep disruption; loss of enjoyment of peace and quiet; a threat to livelihoods based on tourism and nature; and damage to the pride people have of living in such a place.

Specific Concerns

Natural Character and Landscape

15. An industrial operation of this magnitude would be the first of its type for the area and a new intrusion into the landscape and soundscape.
16. The natural character of the area would be significantly impacted by the proposed industrial operation. The proposal should not be considered in landscape isolation, as if it were not part of the wider landscape context in which it sits. Although the proposed site has been historically modified, it is located within the richness of the Barrytown Flats with its mix of farms, lifestyle blocks and small settlements amongst significant areas of relatively undisturbed wetlands, remnant and regenerating coastal forests and creeks. The Barrytown Flats is rural residential with a high level of naturalness and distinctiveness, and lies within the wider and highly natural landscapes and seascapes of the Paparoa Range in the east and Tasman Sea in the west. It is not an industrial setting, and the proposed intensive industrial activity would have a significant impact on the area's natural character and natural landscape.
17. The proposed mine site is surrounded by a multitude of natural landscapes and features. Coastal lagoons (SNA) and kahikatea wetlands lie directly to the west and/or north of the proposed mine disturbance area. Directly south of the site is Canoe Creek and the sand plain forest remnant. Parts of Canoe Creek and Collins Creek run within the site. On the wider Barrytown Flats there are original coastal forest remnants along with regenerating areas, scheduled 1 and 2 wetlands, public conservation land including Maher Swamp and some 12 largely unmodified creeks. The Westland petrel breeding colony lies at the northern end of the Barrytown foothills and is unique as a functioning seabird forest ecosystem – the last of its kind left on mainland New Zealand.
18. The Barrytown Flats enclave and the wider highly natural landscapes and seascapes context as a whole is remarkable, memorable and noteworthy. The proposed industrial operation would be inappropriate for the Barrytown Flats and would threaten the existing natural character, natural features and landscape. The landscape architects have assessed only superficially, largely as mere fixed viewpoints. This is demeaning of the complexity of the natural processes and natural systems of the landscape associated with the Barrytown Flats that is enjoyed and appreciated by locals and visitors.
19. There are differences of opinion between the applicant's Landscape Assessment (Glasson Huxtable) and the Landscape peer review (Boffa Miskell). The Landscape Assessment anticipates '*Low to moderate/ less than minor*' effects on Landscape effects/Landform during mining activity. However, for the same category, the Landscape Peer Review predicts '*moderate adverse/ more than minor adverse effects*'. And in terms of Natural Character

effects on the site, the Peer Review anticipates the effects to be again *'Moderate/more than minor'* while in the applicant's Landscape Assessment adverse effects are *'not stated'*¹.

20. Part of the proposed haulage route is considered an outstanding natural landscape in the Grey District Plan:

'Coastal area from Nine Mile Creek to Seventeen Mile Bluff between the sea and 200m east of SH 6. [Table 4.1]'

This famously scenic stretch of the Great Coast Road to the south of the Barrytown Flats was recently described as *'easily one of the best road trips in the world'*².

It forms one of the proposed mine haulage routes; increasing the load on this stretch of highway by the order of up to an additional 140 light vehicles and 50 heavy vehicle movements per day, from 5am to 10pm. An increase of this magnitude in such an outstanding place would be highly inappropriate from a landscape point of view, let alone for all the amenity and safety concerns with tourists often stopping to take photos and to enjoy the scenery and naturalness. Industrial scale mine haulage on this route would not be in a manner that avoids, remedies or mitigates adverse effects on this outstanding natural landscape, but would be an example of inappropriate development. See also RMA 6 (b).³

21. The proposal would put at risk the protection of this stretch of road corridor as an outstanding natural landscape as per the RMA definition and is contrary to the Grey District Plan:

*'Objective 1: The protection of outstanding natural features and landscapes in the Grey District from inappropriate subdivision, use and development.'*⁴

22. Pakiroa (Barrytown Beach) is also on the list of High Coastal Natural Character areas in the proposed TTPP Plan:

NCA41	Pakiroa Beach	Broad sweeping sandy / stony beach backed by an extensive dune field, coastal scrub and forest – at the northern end of Pakiroa Beach. Natural qualities are clearly evident in the dune landform, wind-swept vegetation cover and their relationship with the Tasman Sea contribute to the feeling of naturalness. Intact sequence of vegetation from dune fields through to coastal forest. Presence of pasture and farming modification behind the coastal forest does not overly detract from the highly expressive and natural processes that are the dominant element of the unit.
-------	---------------	--

TTPP Schedule 7: High Coastal Natural Character list

¹Boffa Miskell Landscape peer Review, [38], p8. Table compares the results of the different assessments.

² <https://www.nzherald.co.nz/travel/south-island-road-trip-why-the-west-coast-is-an-epic-journey-by-campervan/EMARWFGS5FESLMC2YYHGXF4Q4/>

³RMA: 6: Matters of national importance (b) the protection of outstanding natural features and landscape from inappropriate subdivision, use, and development.

⁴Grey District Plan, Landscape: Outstanding Natural Features and Landscapes

23. The proposed mine site, whilst not deemed a high or outstanding natural area in itself, is surrounded by areas that are. This is reinforced in the proposed TTPP when it says:

'... presence of pasture and farming modification does not detract from the highly expressive and natural processes that are the dominant element of the unit'.

This indicates that it is important to consider the site of this proposal in context and with regard to the wider environment in which it sits. It does not sit in isolation.

24. The effects on landscape and topography of an average reduction in ground level of 1.2m by the end of operations signals another concern, especially considering the high water table and vulnerability of the area to erosion and coastal incursion in a warming climate.⁵ I endorse the expert witness statement of Professor Brian McGlynn. In particular I highlight his rehabilitation concerns in paragraph [60] :

In short, the land cannot be restored following the proposed activities. It could be rehabilitated or reclaimed and made more useable for agriculture or turned into a different hydrologic and ecological system. The current hydro-ecological system will be unalterably changed and the details of how this would manifest hydrology, water quality, and stream and wetland ecological dynamics are poorly predictable. There is a high probability of an engineered mess, even with good intentions. I object to the suggestion that the landscape and larger hydrological and ecological system would be improved during and post-mining relative to today and that this would be a water quality benefit.

25. In the Boffa Miskell response to submissions on Landscape and Natural Character, Rhys Girvan acknowledges the number of submission points and quotes many local submissions made regarding concerns, assessing that: *'adverse landscape character effects will be slightly greater than identified in the revised assessment'*.

However, Mr Girvan still concludes that the operation would result in *'low moderate landscape character effects during operation which accords with minor adverse effects.'*

He apparently comes to this conclusion due to the site's *'working rural context combined with the temporary and progressive nature of the mining activity.'*⁶In his conclusion, Mr Girvan does not refer to any of the landscape and amenity concerns identified as important by locals (described above), nor the site's location adjacent to a famed tourist area. The Barrytown Flats is not only a working rural environment, but a residential rural environment.

Mr Girvan did assess however, that there would be more than minor adverse effects on Landscape effects/Landform and on the Natural Character of the site during operation.

⁵Palaris Final Landform report, p5: *'The calculation shows that on average post mining is 1.2 m lower than pre mining surface.'*

⁶Landscape report in response to submissions

Amenity

26. Many local residents have chosen to enjoy living in Barrytown and on the wider Coast Road because of the high natural character, high natural landscape and corresponding high amenity values offered by living in such a location. The amenity interpretation/definition from the RMA:

Part 1. Interpretation: amenity values means those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes.'

27. As noted in the GDC s42a report, the large number of opposing submissions show that opposition to the proposal is largely from people who live locally or have a connection to the area. By contrast, most of the supporting submissions appear to come from people based outside the local area and were overwhelmingly on the TiGA-supplied template.
28. Situated between the Paparoa Ranges and the Tasman Sea, with coastal forest remnants, wetlands, creeks and lagoons, the Barrytown Flats area abounds with natural features and recreational values for residents and visitors. The proximity to Punakaiki, the Paparoa National Park, the Westland petrel colony and the scenic Coast Road Highway draws tourists to the area in growing numbers, attracted by the abundance of natural character. By reducing the dominant naturalness and aesthetic coherence, this mining proposal would put the area's many amenity values at risk.
29. The visual and other sensory impact of mining, ore stockpiles, a 15m high building and associated industrial infrastructure would degrade pleasantness, including the calming effect of views from SH6 and local homes of green pasture and remnant coastal forests and wetlands out to the Tasman Sea. Views looking back to the Paparoa Range from the beach and lagoon would also be affected, along with adverse effects of noise and dust from an industrial activity.
30. We have a potential situation where a large-scale mining project could sit front and centre in the midst of one of the top ten coastal highway corridors in the world with the applicant seeking to use this famous route for mine haulage. This does not sit comfortably with values based on natural amenity. These are prized not only by the local region and residents, but also nationally and internationally:

*'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?"'*⁷

⁷Submitter # 249



Photo 1. View from 3316 Coast Road, overlooking the proposed mine site

31. Amenity values enjoyed by residents and visitors include sweeping views out to sea unimpeded by the sound, sight or activity of industrial mining involving a large processing plant and associated infrastructure; the feeling of naturalness; the quiet enjoyment without the disturbing rumble of industrial equipment working 24/7, or frequent heavy truck movements potentially from 5am to 10pm. Although a State Highway, there are currently long quiet periods, particularly in the early morning and late evening and also on Sundays (which apart from milk tankers has very few heavy vehicles) - the enjoyment of which would be lost with the change in rural character, were this venture consented.
32. This proposal is contrary to the objectives of Section 19.3 of the Grey District Plan (Rural Environmental Zone). This document aspires to a situation that:

'Enables people and communities to carry out a variety of activities...' and highlights the need for: *'The retention of the character of the rural environment in which existing amenities include its openness and spaciousness, natural features and presence of indigenous vegetation'*.

This could not be more pertinent here.



Photo 2. View from 3320 Coast Road, overlooking the mine site

33. These objectives are developed for the anticipated environmental outcomes under Section 19 of the same plan which provides for:

'Maintenance and enhancement of the natural character and amenity of the rural environment while providing for a diverse range of activities' and

'Use, development and protection of resources within the District, providing that the scale of each activity and its effects, both short and long-term, are appropriate to its environment and community needs.'

34. The Plan emphasises *'maintenance and enhancement'* of the natural character and amenity of the rural environment' as an objective. It is questionable whether the scale and intensity, and therefore effects of the proposal, would be appropriate to the environment and community in this case. The natural character and amenity we value would be neither maintained nor enhanced by the mining use proposed.

*'The opposition to the application stems from concerns about its adverse effects on the area's pleasantness, the visual harmony of the surroundings, cultural attributes, and recreational opportunities, which are integral to both the community's well-being and visitors to the area. Amenity values can significantly influence people's well-being, their desire to live in or visit an area, and the overall quality of life in a community. I am a local resident who has lived in the area for over 20 years. In that time, the area has remained the same. It is a small community offering peace and quiet and opportunities for visitors to immerse themselves in nature. Farming work in the area has had minor effects on this, as an occasional industrial noise is not ongoing. I live minutes from the mine and can see the entire proposed mine site from where I live. At night, I see no lights from my property. Should the mine go ahead, this will change the landscape. I will see buildings, lights, machinery, and the whole mine from my home. This will ruin my peace and well-being.'*⁸



Photo 3. Kotuku at lagoons adjacent to proposed mine site

⁸Submission # 323

35. There have recently been native tree planting events in this area close to the lagoons on the Langridge Farm through Conservation Volunteers, to encourage more regeneration and biodiversity; as this family has recognised the area's natural habitat values. These initiatives link and extend the native remnants and have been well supported by the community as examples of actions that show appreciation of, and commitment to, the natural attributes of the Coast Road corridor.
36. The proposed visual bund and re-vegetation would take several years to develop⁹ and even when grown, 'everyone will know there is a large-scale mining operation on the other side of the bund'¹⁰. Parts of the proposed site will always be visible from SH6. There would also be a non-compliant 15m high processing plant¹¹ visible in the landscape from multiple directions and locations, since the top half will always be visible. The Landscape Assessment states:

'Although this building will be a new element in the landscape, at this distance and from this particular location, it will be a very small component when compared to the surrounding landscape, particularly the ranges. For these reasons, there is considered to be a negligible effect (less than minor) effect on a viewer from this end of Burke Road.' [my emphasis]¹²

This will be a significant change and it is questionable whether the adverse effects of this will be 'negligible', just because it is small compared to the Paparoa Range on the other side of the highway. This would be a new intrusion into the landscape of Barrytown Flats.



Photo 4. View from Langridge Farm looking north to proposed mine site (processing plant location centre)

⁹Landscape Graphic Supplement, 26.0. p40. 'Plant size shown in the previous cross sections are approximate to 4 years of growth'.

¹⁰Submission # 206

¹¹Buildings above 10m in height are non-compliant in the Grey District Plan

¹²Landscape Assessment, Public viewpoints within the Barrytown area, p 50-51.

The negative effects of viewing industrial operations from the beach/lagoons for people recreating there would also be marked.

*'I take visitors to the lagoon to view the many bird species that inhabit the area. It is an area of relaxation that will be changed should a mine proceed, and the bird habitat may be destroyed, as is evident if we go too close to the birds or make noise; they often leave. The mine would turn a small village into an industrial area, and the road, even though a state highway it is a quiet rural road, would be turned into an industrial road. Despite statements that may be made that the area is insignificant, Barrytown is a significant area surrounded by nature and coast, national parks and birdlife. It is the nature of this area that drew me to live here 20 years ago. I have concerns for my well-being and the local community's well-being.'*¹³



Photo 5. Paddle boarding on the Canoe Creek Lagoon

Social Well-being

37. It seems plausible on the face of it to agree with the aim of diversifying the economy of the Coast to make it even more resilient; but this is not best done through activities that extract such a cost from the community and environment. Especially a venture where: *'The reality is that we cannot know what portion of this Operating Surplus will go overseas versus what will be reinvested in the community.'*¹⁴ This uncertainty adds extra stress and leaves many locals questioning if the associated risks to amenity, community and the environment would be worth it.

¹³ Submission #323

¹⁴ Economic Peer Review, Economics, p6

20 Submission # 172

38. Submitter #172 also points out:

*'It should also be noted that this kind of transient or temporary workforce can bring benefits, but also problems for a community, in the shape of disorder, crime and difficulty gearing infrastructure and services for the population served. The evidence is also clear that while it can provide some short-term boosts, it does not deliver sustainable prosperity to communities'*¹⁵

39. A 2019 US study also examines the social costs of mining in rural communities¹⁶ and closer to home there is evidence of historic boom/bust scenarios playing out on the Coast, e.g. Solid Energy going to voluntary administration in 2015 and the mothballing of the Escarpment Mine Project in 2016. Both resulted in significant job losses and subsequent social costs to the Buller region.¹⁷

40. On the West Coast there exists a housing shortage and a tight labour market¹⁸. Any local workers employed by TiGa are likely to be cannibalised from other industries, potentially accentuating labour shortages for local essential service industries.

*'TiGa, acting in their own and their shareholders' interests, are offering a solution to a problem which doesn't exist'*¹⁹

*'I oppose the application on social grounds. One of the functions of council is surely to look after residents. I am astounded the council will not much consider the welfare of residents who were there well before miners decided to make some money. Surely the proximity of some houses within the noise contours of the mine so many hours a day is a serious consideration. Why is the council not looking after its people and being so cavalier about their needs and wishes?'*²⁰

41. I endorse submission 325, which cites many studies related to the adverse effects of noise and breaks down the way different noise and sounds are experienced. The following point is made with regard to evening trucking:

*'Most people need time to unwind after stressful days and listening to how effectively the sound/vibration of yet another truck passing is masked by the sound of the truck passing in the other direction is not how most people like to relax.'*²¹

¹⁵Submission # 172

¹⁶ 'The Social Costs of Mining on Rural Communities', Power Consulting Inc, Missoula, Montana. 21/8/2019

¹⁷<https://www.nzherald.co.nz/business/stockton-mine-job-losses-a-painful-situation/S3VQUTGV7JY62ETRTT4JVN576M/>

¹⁸ Heath Milne, CEO of DWC, stated at TTPP strategic objectives hearing, Dec 2023 that "The single biggest issue hampering economic development is accommodation for workers and people that want to move here "

¹⁹ Submission # 249

²⁰ Submission #321

²¹ Submission # 325

42. And as submitter #331 points out:

*'The disruption to a currently peaceful part of the world by the noise, dust and dirt caused by mining....The noise of heavily laden trucks would be an unwanted addition to the sounds which we enjoy, of birdsong and the sound of the sea, particularly to the many houses situated close to the Coast Road. The beauty of a quiet evening at dusk under the stars would be rudely interrupted by passing trucks.'*²²

43. It should be mentioned that cultural attributes, such as the sense of a developing and thriving community, are being threatened by unwanted industrial change and intrusion.

44. I note the GDC s42a Officers Report paragraph 203 states: *'Overall, the evidence indicates that noise and vibration effects will likely be no more than minor.'*

The Barrytown Flats and much of the wider Coast Road are currently zoned rural under district plans, however, over the past few decades the Coast Road has developed into rural residential areas. Councils have consented subdivision of land parcels into lifestyle blocks as small as 1ha, and also into small settlements. Subdivision has been intensifying since the 1990s and the Coast Road has long passed from being solely a working rural zone into an area where people choose to live for lifestyle reasons, enjoying nature and some raising families, and to operate home-based businesses. The noise and vibration effects from use of SH6 as a mine haulage route would therefore be widely felt amongst the hundreds of residents living in close proximity to SH6. Some of these people will be more susceptible to noise and vibration adverse effects, such as children with longer hours of sleep, the elderly, shift workers and those living in residential properties near SH6. As the local baseline is one of tranquillity and naturalness, the proposed activity would disrupt important natural attributes of the Barrytown Flats environ that is enjoyed for its high aesthetic coherence.

45. Immediate neighbours would be most affected from the adverse amenity effects of the proposed operation; from noise, dust, stress and worry, loss of enjoyment of peace and quiet, and intrusion into the visual scene and the night sky. As one puts it:

*"I disagree with Tiga's paid experts regarding the effects of noise and visual disturbance and the effect of truck movements to/from site on the community. In their statements they claim, in their opinion, theoretical effects will be "no more than minor", "Less than minor". The experts don't live in our community, the experts aren't going to live next to the proposed mine 24/7. WE ARE."*²³

46. And other submitters:

*'Residents from Barrytown and the Coast Road communities will, I'm sure, reflect on the values of the place and why they live there. That's amenity, and it's difficult to find measures for that enable it to be weighed against more **easily quantifiable***

22 Submission #331

23 Submitter #203

*effects like jobs and dollars. Views, being able to hear birdsong, or otherwise experience rich biodiversity, a sense of feeling part of the landscape rather than dominating it. I can readily see how these will all be adversely affected by a major industrial activity right on their front doorstep, and I already know people who have moved away from fear of the impact the proposed mine would have on them. I think that's unacceptable.*²⁴

*I have met with local people who have literally been crying over the proposed mine. Locals are trying to raise children in an otherwise quiet, isolated natural environment. Some people have grown old in the area and are now threatened with the last years of their lives being in an industrial area. I came here for the natural environment after travelling to over 50 countries in the world. Finding an environment as significant and undisturbed as the Barrytown and surrounding area is rare. This will change should a mine go ahead. This will affect my well-being and the community's well-being.*²⁵

Conclusions

47. The natural character of the area would be significantly impacted by the proposed industrial operation. The proposal should not be considered in landscape isolation as if it were not part of the wider context in which it sits. It is not an industrial setting, and the proposed intensive industrial activity would have a significant impact on the area's natural character, its naturalness and tranquillity.
48. As a whole, the Barrytown Flats and the Coast Road within the wider highly natural landscapes and seascapes are *remarkable, memorable and noteworthy*. The proposed industrial operation would be intrusive and inappropriate for the area and would threaten the existing natural landscape, natural character and amenity values.
49. The scale of the increase in traffic and heavy trucking would degrade social well-being and would impact the community connectivity which requires a safe and usable SH6 as the area's only transport route. As there are numerous and growing lifestyle blocks and residential settlements along the proposed mine haulage routes, there would be significant and widely distributed adverse effects on the community.
50. There are concerns regarding the adverse effects of an industrial development on local amenity values. Current amenity values are high and have drawn many residents to the Barrytown Flats coastal environment. Amenity values would be degraded by industrial infrastructure, lights, noise and activity, potential for dust and disruption of visual landscapes.
51. As noted in the GDC s42a report, the submissions show that the deeply felt opposition to the proposal is largely from people who live locally or have a connection to the area. By

24 Submission # 172

25 Submission # 323

contrast, most of the supporting submissions appear to come from people based outside the local area and are overwhelmingly on the TiGA-supplied template.

52. Social well-being would be affected including increased effects of stress on people due to loss of amenity; increased safety risks of SH6; increased traffic noise; potential sleep disruption; enjoyment of peace and quiet; a threat to livelihoods based on tourism and nature; and damage to the pride of living in such a place.
53. The proposal is inconsistent with the RMA Schedule 3A, 6(a), which requires territorial authorities to provide well-functioning environments that:
'enable(s) all people and communities to provide for their social, economic and cultural well-being, and for their health and safety, now and into the future'.