

**FORM 13: 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: WCRC: RC-2023-0046 GDC: LUN3154/23	APPLICANT: TIGA MINERALS AND METALS LTD
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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	James Reginald Bradley		
Postal address	[REDACTED]		
I am the owner/occupier (delete one) of the following property:	[REDACTED]		
Primary contact person/s	James Reginald Bradley		
Email address	[REDACTED]		
Phone number/s	Home:	[REDACTED]	Business:
	Mobile:	[REDACTED]	Fax:

Signature of the submitter (or person authorised to sign on behalf of the submitter):	Date:
	9/10/23
Name (BLOCK CAPITALS):	
JAMES REGINALD BRADLEY	

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

(tick one)

(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 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/we **have** served a copy of my/our submission on the Applicant as per Section 96(6)(b) of the RMA

 Yes

The specific parts of the application that my submission relates to are: *(give details)*

See attached.

My/our submission is that: *(include whether you support or oppose the application or specific parts of it; whether you are neutral regarding the application or specific parts of it; and the reasons for your views).*

I oppose the application in its entirety

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

See attached

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

*Select one.

~~*I am/am not† directly affected by an effect of the subject matter of the submission that—~~

~~(a) adversely affects the environment; and~~

~~(b) does not relate to trade competition or the effects of trade competition.~~

~~*Delete this paragraph if you are not a trade competitor.~~

~~†Select one.~~

I request/do not 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.

*select one.

Important information – Please read carefully.

My submission addresses the mine's location, the adverse impact it will have on the future direction of the West Coast, the adverse impact it will have on the economic health and safety of my community and the adverse effect it will have on the Coast Road, wild life and conservation of this special natural environment.

These adverse effects degrade wellbeing and include:

Local: 'Our community', a group of dwellings on average 5 to 10 metres from the highway, will experience noise, vibration, Coast Road entry and egress difficulty, health and disability concerns, wellbeing loss. And so will other communities and homes along the Coast Road.

Economic: Detrimental effect on house prices along highways and town. Cost to households for noise and vibration mitigation

Fauna and flora: The Barrytown mine site and it's extension to include the Coast Road in the product transportation will have significant negative effects on the special natural environment and it inhabitants.

SH6 The Coast Road: Road damage, Road closures, Induced slippage and subsidence, reduced stressed national budget to keep highways usable. All concerns for our community and a major health access concern for our ageing population.

Transportation: Mass movement of heavy mineral sands frequency, Dust and radiation content. Carbon emissions on a huge trucking operation.

Environment: Damage and degradation of an asset of national significance.

More than just one mine: With each mine application we see an alarming acceleration in mining truck movements on highways and through towns and an alarming increase in carbon emissions.

I am concerned by the substandard information in their consent application. By business standards it is a poor document. It demonstrates TiGa's lack of understanding of the local environment and lack of concern for the wellbeing of the local community. This is particularly concerning because the nature of operation is unlike traditional mining on the West Coast.

The financial viability of TiGa poses a risk to it's creditors and the local economy.

My submission is:

That I oppose this application in it's entirety because it does not confer the significant local , regional or national benefits that the RMA requires of a discretionary activity. In fact I believe it damages the lives of residents, hinders the regional balance of industrial growth on the West Coast, the vibrancy of communities and takes us backwards towards the 1950's, undoing the hard work of towns to open themselves to tourism and modern job opportunities.

I am a 5th generation West Coaster born in Hokitika. I am from a mining back ground. My grandfather, a life long coal miner died early. My uncle died in a coal fall. We are also farmers and business people. I left the Coast and contributed to building a national business with a present day turnover of over \$30 million dollars holding positions general manager ,co owner, group director.

██████████ One of ten houses. It's a great little community. We purchased the house about two years ago because of it's proximity to the sea and surrounds. It's almost Jurassic walking southwards on the beach and has great bird life. The other day I was walking back along the SH6 from the beach when a tip truck was coming down the bluff. Vehicles gather speed as they come down, it was a visceral experience to hear, feel and see as it speed by. A harbinger of what's to come. We have visibility for 100m on both sides going onto the road. It's too dangerous for most of the older residents, especially in poor weather, who rather than cross the centre line, drive up the road a kilometre to turn where there is better visibility. Last week my neighbour told me she doesn't drive into

Greymouth faster than 80 kms per hour because she has had near misses with vehicles crossing over the centre line on corners.

Most of us are getting up to seventy and continually have stuff going wrong. Knee and hip replacements, aneurysm, ear virus damaged hearing, hernias, covid, stroke. The list goes on and we are reliant on the Coast Road.

We get a lot of tourists from all over the world. I have been building sea walls and they stop and chat. Last week one guy from California said he was getting away from their bush fires. I asked "Why here?". He said "We researched a lot and liked the contrast it's great." The Coast is realising the potential of it's unique place in the world and we get a lot of people stopping at low tide. There were so many before covid it became a problem with cars parked illegally and people coming onto our sections for photos. The numbers are rising again. Tourism is a great industry for this part of the Coast but it's a fine balance that needs to be carefully managed. Having 50 daily mining trucks on the road will be very dangerous. A backward step with potential to choke off the progress to re-image the Coast beyond being an extractive economy.

There will be a mining truck passing our house every 7 minutes. Our houses are poorly insulated, without double glazing and will be badly affected by noise and vibration. [REDACTED] the road reserve. Some of the houses sit on the road reserve and others ten metres from the road. Would you mind reading that again, and apply it to your home.

When I read TiGa's consent application one question kept coming up. Who is TiGa? The initial reaction by locals was to assume they were a big Australian company and imagined a David and Goliath conflict. For me, I was taken back by the sketchy information and lack of detail so we looked up where the head office was, who were the directors, what mining experience they had and it became clear. A shell company, some directors in realestate, no existing mining operational track record. A company that has been set up to get a consent to mine. A first step to accumulate capital through an overseas share float. A speculative company, susceptible to market investment and commodity prices, share price fluctuation, sharp falls if results disappoint. A Penny dreadful to some.

The consent application reflects the company's lack of mining experience and not what you would expect from an experienced mining operator with capital and track record.

TiGa trumpets jobs and financial benefits but typically these startup companies are short on cash and look to spread risk. Technical employment is flown in to get the operation established. Only here for a startup period of time. Trucking jobs, the main employment, will likely be contracted out to owner drivers who carry the risk of buying rigs or to local community trucking companies who similarly carry the risk. Other creditors are at risk if the share value drops. Remember this is a speculative start up venture. These are significant risks resulting in harm to the community and major loss of wellbeing to residents.

This is not a conventional site contained mine typical of West Coast mines. It is a new and divisive industry suited to outback Australia. In Australia, no-one would dare suggest a similar operation on Victoria's Great Ocean Road which passes the Twelve Apostles. There would be a national outcry. But here we are.

A few years back I was in a social setting. The topic turned to a new mining venture. An Australian company. The coal seam was high quality, they could use contract labour, great investment, great share buying opportunity. After the explosion, nothing said, silence. My childhood fishing mate lost a son. Some people would only have us see the bright side of new ventures but older heads don't. They look into the risks, the health and safety of their communities and the workers. They look at the bigger picture of where the future prosperity is for the region. They look at an industry like this in it's entirety, up and down the West Coast and how it will effect communities and other industries. They look deeply into the company's ability to mine, process, seperate, market and to whom the product will go. This is a potentially dangerous product and we have a duty to international communities.

I am not convinced these miners know how they will get a consistent flow of product to the market.

The WMS was consented to send product through Westport port, then shifted to Nelson, I understand then Lyttleton was considered and recently Greymouth. Any Coaster knows how unpredictable Greymouth mouth is. And then the main divide is due to rupture leaving roads impassable. A smooth flow of product is essential. Delay will mean lost income and share markets are unforgiving leaving creditors with these startup companies with no where to go. A disaster for the Coast. Any businessman will tell you cashflow kills business's.

Finally. Did you know by 1770 around half of NZ bird species were already extinct. Here we have the last remaining Petrel breeding site along one of NZ's last untouched areas. A priceless asset that will keep giving, if you must value it in human terms. Can we just for once be guardians and protectors rather than wreckers?

For these and other reasons I oppose this mining application in it's entirety.

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@wcr.govt.nz Website www.wcrc.govt.nz	Grey District Council 105 Tainui Street PO Box 382 Greymouth, 7840 planning@greydc.govt.nz 03 769 8600
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Note to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

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.