

Ben Douglas

From: Suzanne Hills <suzannedhills@gmail.com>
Sent: Tuesday, 15 August 2023 13:02
To: TTPP Info
Subject: Fwd: Further submission opposing s493 by TiGa Minerals & Metals Ltd

Caution! This message was sent from outside your organization.

[Allow sender](#) | [Block sender](#)

I request the below submission points in red are tied to my further submission opposing TiGa's submission.

Regards
Suzanne Hills

----- Forwarded message -----

From: Suzanne Hills <suzannedhills@gmail.com>
Date: Mon, 19 Jun 2023, 2:01 pm
Subject: Further submission opposing s493 by TiGa Minerals & Metals Ltd
To: TTPP Info <info@tpp.nz>
Cc: <stephen.mann@tigamm.com>, <alex.booker@al.nz>

I request that this email forms my further submission opposing s493. The email is copied to the supplied TiGa contacts as required by the RMA.

I made a personal submission on the TTPP and therefore I have an interest greater than the public generally. This is the reason for my further submission opposing TiGa s493.

I wish to be heard in support of my further submission. I am willing to be heard in conjunction with other persons opposing s493.

I oppose submission 493 by TiGa Minerals and Metals Ltd. The bulk of the submission points are contrary to one or more of the Resource Management Act 1991 (RMA), the West Coast Regional Policy Statement 2020 (RPS), Environmental Standards and Regulations, and the New Zealand Coastal Policy Statement (NZCPS).

In particular: (the points referenced below are from TiGa's submission).

Point 10 puts significant natural areas (SNAs) at risk. Infrastructure is defined in section 2 of the RMA. It is very specific and does not encompass the multitude of activities with either a functional or operational need.
493.015, 493.022, 493.025

Point 11 is outside the scope of the TTPP. The transport network exists for all road users and modes of transport, including cyclists and pedestrians. This is clear in the Land Transport Act 1998 and associated Land Transport Rules.
493.029

Point 12 is contrary to the RMA. Amenity values must remain in the transport section as it is the responsibility of councils to ensure the health and wellbeing of people and communities are protected from significant levels of noise and vibration, including that generated from State Highway users.
493.027, 493.028, 493.030

Points 17 & 18 are contrary to the RMA, RPS and NZCPS. Offsetting and compensation for ecological adverse effects can only be considered in certain limited circumstances, including only if adverse effects cannot be avoided, remedied or mitigated. Section 7, Policy 3 of the RPS clearly outlines the criteria. Directive provisions seeking to "avoid, protect, prevent" or "minimise, restrict and preserve" are critical to the purpose of the RMA: the integrated sustainable management of natural and physical resources. Sustainable management is not limited to SNAs.
493.095, 493.051

Point 20 are not “minor amendments” to provisions in the Rural Zones. They fundamentally undermine the purposes and principles of the RMA, e.g. “management of effects” is a very different matter to “minimisation of effects”.

493.096, 493.091

Point 21: the formation of the proposed mineral extraction zone clearly fail the test set out under the National Planning Framework. The holding of a mining permit or exploration permit under the Crown Minerals Act does not dictate land zoning. It is entirely unjustified to suddenly change the zoning of long-standing rural zones to the proposed and highly contentious mineral extraction zone solely because a private company holds a mining or exploration permit.

493.107, 493.108, 493.109

Point 22: as per point 4 above. Management of effects would likely lead to very different outcomes from that of minimisation of effects. It puts biodiversity, community wellbeing and culture at risk and is contrary to the RMA and RPS.

493.110, 493.111, 493.118

Points 23, 24, 26, 28 & 33. Overlays are an important and essential sustainable management tool and ensure compliance to higher order statutory instruments such as environmental standards and regulations, National Policy Statements and the NZCPS. To allow functional need, or worse still, operational need, to automatically trump overlay restrictions puts natural, cultural and wellbeing values at risk and again fundamentally undermines the principles and purpose of the RMA.

493.015, 493.022, 493.025

Point 31 puts people’s health and wellbeing at risk. Noise relief at weekends and public holidays from that generated during weekday hours is essential to health and wellbeing.

493.020, 493.030, 493.088, 493.089

Point 32 on applying the mineral extraction zone to multiple rural zoned properties has absolutely no justification. See point 5 above.

493.107, 493.108, 493.109

Point 35 is contrary to the RMA and RPS. PUN-W034 is a scheduled SNA in the coastal environment and includes part of the coastal marine area because it includes a coastal lagoon and the Plan governs to mean high water springs (MHWS).

493.127

I request that Council disallow all individual submission points made by TiGa in relation to the above points and in doing so uphold the integrated ecosystem principle of the RMA. Anything less will put ecosystems, biodiversity, culture, and community and individual health and wellbeing at risk. Loss of short term economic benefit to TiGa and it’s shareholders are irrelevant and inconsequential compared to the damage to the environment that will follow if Council allow TiGa’s submission points to be upheld in the Plan.

Regards

Suzanne Hills
2706 Coast Road
RD1
Runanga 7878
0284156994
suzannedhills@gmail.com