

## Online submission

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<b>Submitter No.</b>	S129
<b>Submitter Name</b>	Jan Fraser
<b>Submitter first name</b>	Jan
<b>Submitter middle name</b>	Megan
<b>Submitter surname</b>	Fraser
<b>Submitter is contact</b>	Yes
<b>Email</b>	<a href="mailto:l-o-m-a-h@windowlive.com">l-o-m-a-h@windowlive.com</a>
<b>Joint presentation</b>	Yes
<b>Trade competition</b>	I could not gain an advantage in trade competition through this submission.
<b>Directly affected</b>	N/A
<b>Withhold contact details?</b>	No

## Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
General Rural Zone	GRUZ - R12	Oppose	<p>The permitted activity under this rule (mineral extraction of up to 20,000m<sup>3</sup> a year per property and 3ha at any one time) provides inadequate control where large-scale sand mining is proposed on several adjacent land parcels as is the case on the Barrytown Flats. Here there are 6 current mining permits issued to local artisanal sand miners totalling 88.4 ha. All of these are coastal and do not immediately affect residents. By contrast, one company, TIGA Minerals and Metals Ltd., has two exploration licenses covering 797ha and a mining licence covering 800ha of the Barrytown Flats (<a href="https://data.nzpam.govt.nz/permitwebmaps/?commodity=minerals">https://data.nzpam.govt.nz/permitwebmaps/?commodity=minerals</a> ). TIGA's permits cover several farms and numerous land parcels. They have a declared aim of mining the whole of the Barrytown Flats (Greymouth Star, 06/09/22).</p> <p>GRUZ-R12 would permit TIGA to begin large-scale sand mining on several properties on the Barrytown Flats, with cumulative effects on traffic (10 heavy vehicle truck movements per day per property), dust, noise, light pollution, amenity values, wildlife disturbance and potentially other unanticipated effects. The purpose of living on a lifestyle block on the west coast is for the peace, tranquility and visual vista; these pollutions will make that impossible. Furthermore, if these disturbances are allowed this close to the community, the on selling of these properties will be difficult, and likely to result in considerable financial loss.</p> <p>GRUZ-R12 is therefore not fit for purpose and needs to be removed. Mineral extraction should be regarded as a Restricted Discretionary or Discretionary activity (GRUZ - R25) in areas such as the Barrytown Flats with a mix of Rural Lifestyle and General Rural Zones, thereby allowing for appropriate levels of community consultation and adequate oversight of the consenting of mineral extraction operations.</p>	Remove GRUZ R12 and make Mineral extraction a restricted discretionary activity in Rural Zones.

Mineral Extraction Zone	MINZ	Amend	<p>From the draft plan (Mineral extraction zone overview section), the rules for designating a land parcel as a Mineral Extraction Zone are:</p> <p>The MINZ - Mineral Extraction Zone covers areas where there are discrete, long term mineral extraction activities that are currently authorised. This authorisation is from three different mechanisms and includes:</p> <ol style="list-style-type: none"> <li>1. Coal mining licences under the Coal Mines Act (1979);</li> <li>2. Ancillary coal mining licences under the Coal Mines Act (1979); and</li> <li>3. Resource consents issued under the Resource Management Act (1991)".</li> </ol> <p>We support these rules. However, they do not apply to the Barrytown Flats Mineral Extraction Zone because these land parcels do not have a resource consent for mineral extraction. On the contrary, a mining resource consent was recently declined for this property. Therefore they cannot be zoned as a Mineral Extraction Zone. The decision to decline the consent by the commissioners considering the Barrytown JV mining application on grounds of likely more than minor effects on the environment/wildlife, hydrology and community impacts was comprehensive and unequivocal.</p>	<p>Amend Barrytown Flats Mineral Extraction Zone designation</p> <p>We support the guidelines in the draft TTPP for designating a land parcel as a Mineral Extraction Zone. We do not support the designated Mineral Extraction Zone on the Barrytown Flats. It needs to be changed to General Rural Zone in keeping with the rest of the agricultural land on the Flats.</p>
General Rural Zone	GRUZ - R25	Amend	<p>GRUZ-R25 Requires modification to address potential issues arising where multiple land parcels near to one another may be granted mining consents as is currently being proposed on the Barrytown Flats.</p> <p>This should include provision for maximum cumulative local transport movements, noise, dust, lighting effects and effects on local wildlife and waterways.</p>	<p>Amend the rule to take account of potential cumulative effects of multiple mining operations in the same locality as proposed on the Barrytown Flats</p>
Appendix One: Transport Performance Standards	TRNS14	Amend	<p>Heavy mineral concentrate (HMC) mining is a new activity on the West Coast. There is currently one recently consented small-scale (20 ha) HMC mining operation near to Tauranga Bay. Companies pursuing this resource (Westland Ilmenite Ltd, TIGA Minerals and Metals Ltd.) are confidently predicting a large increase in this activity across many sites. Westland Ilmenite Ltd. estimates that it has so far applied for mining consent over only 1% of the land over which it has interests and expects eventually to have several active mine sites. TIGA currently has mining/prospecting interests over 1600 ha of the Barrytown Flats alone, has said it will submit several resource consent applications in 2022/23, and is promising to become one of the largest employers on the West Coast (several articles in Grey Star and Westport News within the last 6 months). These developments are recent – within the last 6 months - and may not have been adequately considered by the plan developers.</p> <p>TRN S14 #3 States "consideration of cumulative effects with other activities in the vicinity". This needs to be changed to reflect the potentially high impact of heavy mineral concentrate trucking from multiple sites along the coast to no more than 2 ports (Westport and Greymouth). Thus the consideration of cumulative effects needs to be in relation to the entire length of the specified journey from mine to port. It should also consider all HMC truck movements from existing mining consents, including the potential impact of several HMC trucking operations converging at the port.</p> <p>The impact of HMC transport movements on established businesses along the routes from mine to port should be considered as not less than minor effects requiring the notification of affected businesses along the route and their submissions taken into account in making consenting decisions. [e.g. the effects of HMC trucks on tourist and hospitality businesses in and around Punakaiki from the proposed sand mining site on the Barrytown Flats].</p> <p>TRN S14 #4 States "Whether there are any effects from the anticipated trip generation and how they are to be mitigated where activities will generate more than 250hvm/d." The provision for 250 hvm/d is arbitrary and excessive. This provision needs to be removed and replaced with an explicit process that evaluates the impact of the proposed additional trucking on existing businesses and communities where effects associated with the activity are likely to be at least minor along the entire route from mine to port in relation to existing vehicle movements and resulting traffic increases and associated issues with noise, dust and amenity values.</p>	<p>Expand and change #3 and #4 in TRNS14 (Appendix One: Transport Performance Standards) to explicitly consider the cumulative effects of heavy mineral concentrate truck movements (or any other extraction-associated large bulk carrier vehicle movements) from mine site to port in relation to cumulative mining truck movements all the way to the port and the potential effects on businesses and communities en route.</p>

## Documents included with submission

None

