

Online submission

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Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Ecosystems and Indigenous Biodiversity	Ecosystems and Indigenous Biodiversity	Support		<p>Plan section: Ecosystems and Indigenous Biodiversity</p> <p>Provision: Ecosystems and Indigenous Biodiversity Policies: ECO -P2, ECO - P3 (b) and (e), ECO - P4</p> <p>Support/oppose: Support</p> <p>Decision sought: Support ECO - P2, ECO - P3 (b) & (e), ECO - P4, ECO - P8.</p> <p>Reasons: Support for all of these provisions particularly as they relate to threatened coastal forest and wetland habitats</p> <p>ECO - P2 (e). The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat.</p> <p>ECO - P3 Encourage the protection, enhancement and restoration of significant indigenous biodiversity by:</p> <p>(b). Promoting the creation of connections and ecological corridors between areas of significant indigenous biodiversity;</p> <p>(e). Supporting initiatives by landowners, community groups and others to protect, restore and maintain areas of significant indigenous biodiversity.</p> <p>ECO - P4 Provide for eco-tourism activities that complement the protection and/or enhancement of areas of significant indigenous vegetation or significant habitats of indigenous fauna and contribute to the vitality and resilience of the economy and wellbeing of the community.</p> <p>ECO - P8 Maintain indigenous habitats and ecosystems across the West Coast/Te Tai o Poutini by: a. Maintaining, and where appropriate enhancing or restoring the functioning of ecological corridors, linkages, dunes and indigenous coastal vegetation and wetlands; b. Minimising adverse effects on, and providing access to, areas of indigenous biodiversity which are significant to Poutini Ngāi Tahu; c. Restricting the modification or disturbance of coastal indigenous vegetation, dunes, estuaries and wetlands; d. Preserving protected wildlife; and e. Recognising the benefits of active management of indigenous biodiversity, including voluntary animal and plant pest and stock control and/or formal legal protection.</p>
General Rural Zone	GRUZ - R12	Oppose		<p>Plan section: General Rural Zone</p> <p>Provision: GRUZ R12</p> <p>Support/oppose: Oppose</p> <p>Decision sought: Remove GRUZ R12 and make Mineral extraction a restricted discretionary activity in Rural Zones.</p> <p>Reasons:</p> <p>The permitted activity under this rule (mineral extraction of up to 20,000m³ 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 (https://data.nzpam.govt.nz/permitwebmaps/?commodity=minerals). 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.</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>

General Rural Zone GRUZ - R18 Oppose

Plan section: General Rural Zone

Provision: GRUZ R18 and Schedule 10

Support/oppose: Oppose

Decision sought: Remove GRUZ R18

Reasons:

This rule only applies to previously mined locations active since 2002 and listed in Schedule 10.

Schedule 10 is empty, making GRUZ R18 irrelevant. Therefore this rule should be removed.

All proposed mineral extraction activities in General Rural Zones should be considered Restricted Discretionary or Discretionary (GRUZ R25).

Mineral Extraction Zone MINZ Support in part

Plan section: Mineral extraction zone

Provision: MINZ

Support/oppose: Amend Barrytown Flats Mineral Extraction Zone designation

Decision sought: 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.

Reasons:

From the draft plan (Mineral extraction zone overview section), the rules for designating a land parcel as a Mineral Extraction Zone are:

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:

1. Coal mining licences under the Coal Mines Act (1979);
2. Ancillary coal mining licences under the Coal Mines Act (1979); and
3. Resource consents issued under the Resource Management Act (1991)".

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.

STRATEGIC DIRECTION MIN - O6 Amend

Reasons:
Retain Strategic Direction MIN - 06.
These are worthwhile strategic objectives.

Oppose MIN - 06 (b).

This objective is irrelevant where the adverse effects of industrial developments such as mining are inflicted upon communities and businesses. Biodiversity offsetting or environmental compensation will not compensate families suffering disrupted sleep resulting from night-time heavy truck movements. Neither will it compensate an ecotourism operator whose business has been adversely affected by a mining operation starting up adjacent to their business operations. Furthermore, 'offsetting' through ill-defined mechanisms is open to exploitation by mining companies offering to, for example, protect iconic species elsewhere in return for concessions in the terms of their consent. Such agreements need to be separate from the consenting process and not an integral part of the District Plan strategic objectives.

Decision sought: Retain Strategic Direction MIN - 06 (a); Remove MIN -06 (b)

General Rural Zone GRUZ - R25 Amend

Reasons:
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.
This should include provision for maximum cumulative local transport movements, noise, dust, lighting effects and effects on local wildlife and waterways.

Decision sought: Amend the rule to take account of potential cumulative effects of multiple mining operations in the same locality as proposed on the Barrytown Flats

Mineral Extraction Zone	MINZ	Amend	<p>Reasons:</p> <p>MINZ Objective O2 states: To ensure exploration, extraction and processing of minerals within the MINZ - Mineral Extraction Zone minimises adverse effects on the environment, the community and the relationship of Poutini Ngāi Tahu with their ancestral lands, sites and areas of significance, water, wāhi tapu and other taonga. This submission addresses that objective in relation to proposed expansion of sand mining activities during the life of the TPP and the potential for unanticipated consequences associated with the predicted rapid expansion of sand (heavy mineral concentrate) mining.</p> <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 Tauranga Bay. Companies pursuing this resource (Westland Mineral Sands Ltd, TIGA Minerals and Metals Ltd.) are confidently predicting a large increase in this activity across many sites. Westland Mineral Sands Ltd. estimates that it has so far applied for mining consent on only 1% of the land over which it has interests, with estimated HMC reserves of 50 million tonnes and could be operating from 4 or 5 sites (Westport News May 22). TIGA currently has mining/prospecting interests over 1600 ha of the Barrytown Flats alone and has stated that it will submit several resource consent applications in 2022/2023. It is promising to become one of the largest employers on the West Coast (Greymouth Star, 22 September 2022).</p> <p>These developments are recent - within the last 6 months - and if the predictions of these companies are correct, the expansion of sand mining on the Coast is likely to be ongoing and substantial throughout the life of the TPP.</p> <p>Large-scale HMC mining activities are different in scale and impact compared with artisanal/small-scale gold mining that has been a feature of the West Coast for over 150 years and which continues today as an accepted part of life in the Region.</p> <p>These proposed HMC mining areas are on coastal placer deposits (mostly pastoral land) which are in many cases adjacent to coastal Rural Lifestyle zones over which the council has allowed substantial subdivision and residential housing development over the last 4-5 decades. The potential for conflict between communities living in the Rural Lifestyle Zone and this new form of mining is evident, as is potential conflict between local businesses and mining activities.</p> <p>A major difference between HMC sand mining and other forms of mining is the large volumes of material being shipped from the mine site in very large articulated trucks to two ports (Westport or Greymouth) for export. If not adequately managed, this will lead to excessive truck movements along major arterial routes and congestion close to the ports. The effect of cumulative sand mining consents needs to be considered in relation to their impacts on communities and businesses along the routes taken from mine to port in terms of noise, dust, traffic congestion, and amenity values en route.</p> <p>Large scale HMC mining thus requires some additional thinking with regards to TPP rules and permissions. While we submit that these rules should be developed by professional planners in consultation with community stakeholders, here are some preliminary suggestions for rules specifically aimed at controlling the impact of large-scale HMC mining on local businesses and rural communities:</p> <p>HMC mining should be a Discretionary activity</p> <p>Negate the possibility of reverse sensitivity arguments being used for existing consented mineral extraction operations where subsequent consents allow an unacceptable increase in heavy truck movements along the same stretch of road to a level which would generate a minor or more than minor effect on the communities or businesses along the road.</p> <p>No night-time truck movements where the trucks pass within 40m of houses on RLZ properties. E.g. no heavy truck movements between 11 pm and 6 am [as currently for milk tankers].</p> <p>Monitoring of cumulative effects of dust, noise, effects on wildlife and loss of amenity values from increasing numbers of articulated mining trucks along routes to the port. Maximum allowable daily heavy truck movements be established for a road (or sections thereof) at the time of granting the first mining consent application using that road. Allowable truck movements for subsequent applications will be limited to the designated maximum allowable truck movements minus the existing consented daily truck movements from other mine sites.</p> <p>Notification.</p> <p>The Council should take a broad view when identifying affected parties and making notification decisions. E.g. considering whether the effects of heavy truck movements from a mine site to a port will affect commercial tourism and hospitality businesses on the trucking route, potentially many kilometres away from the mine site.</p> <p>The Council should be proactive in consulting potentially affected parties along the transport routes from mine to port (where minor or more than minor effects are anticipated) prior to making notification decisions in accordance with S95E of the RMA and associated point 6 under Notification rules in the TPP General Approach section (6. Are there any persons who are adversely affected in a minor or more than minor way in relation to the activity?)</p>	Decision sought: Develop new MINZ rules relating to the management of sand mining activities in support of MINZ - O2
SCHED7 - SCHEDULE OF HIGH COASTAL NATURAL CHARACTER	NCA41	Support in part	<p>Reasons:</p> <p>NCA 41 is described in the plan (Schedule 7) as follows:</p> <p>Broad sweeping sandy / stony beach backed by an extensive dunefield, coastal scrub and forest – at the northern end of Pakiroa Beach.</p> <p>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.</p> <p>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.</p> <p>The link to the original Natural Character and Outstanding Natural Landscape report is here https://tppp.nz/wp-content/uploads/2022/01/NC-Combined-Coastal-TerrestrialONC-HNC-Matrix-2013.pdf and the original map here https://tppp.nz/wp-content/uploads/2022/01/NC-Combined-Coastal-TerrestrialONC-HNC-Maps-2013.pdf</p> <p>The high natural character overlay on the TPP map does not include this area. It should be amended to include NCA 41.</p>	Decision sought: Modify map and extend NCA 041
Ecosystems and Indigenous Biodiversity	Strategic Objectives	Support	<p>Reasons:</p> <p>ECO- O1 To identify and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna on the West Coast/Te Tai o Natural Environment Values 168 Te Tai o Poutini Plan.</p> <p>ECO - O4 To maintain the range and diversity of ecosystems and indigenous species found on the West Coast/Te Tai o Poutini".</p> <p>Support Strategic Objectives to protect Natural Environment Values</p>	Decision sought: Support Strategic Objectives

Documents included with submission

Document name	TTPP submission Barrytown
File	tppsubmissionbarrytown_kk.pdf

Description	TRNS14	Amend	Reasons:	Decision sought: 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.
Transport Performance Standards			<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. 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>	

I am writing to urge the committee to remove the Mineral Extraction Zone from the Barrytown Flats, and rezone it to General Rural. My submission discusses the all-round incompatibility of the large-scale mineral sands extraction and processing that attracts the interest of mining companies in this area, with the peaceful rural lifestyle enjoyed by residents and sensitive ecological areas on the Flats.

Various iterations of mineral sands mining operations have been proposed on the Barrytown Flats over the years. In declining the most recent application in February 2022, the commissioners noted that:

"There were several sensitive waterbodies around the site, including wetlands, swamps, creeks and springs, and the commissioners had concerns that the applicants did not offer them sufficient protection...In particular, the commissioners were concerned about the "cumulative adverse effects" on the tāiko or Westland petrel population from increased vehicle movements along SH6."

(<https://www.stuff.co.nz/the-press/news/west-coast/127759462/west-coast-mineral-sand-min-e-rejected-partly-over-fears-for-westland-petrel-colony>)

The economy of the Barrytown Flats is a combination of farming, micro-scale gold mining, and businesses engaged in eco-tourism and the nature economy. The residents enjoy a quiet pastoral lifestyle that is second to none.

Internationally, the mineral extractive industries are reckoning with the concept of a social licence to operate, which is now being seen in many countries to be as important as legal licensing.

"Social licence requires the acceptance of the people who live and work near, or are affected by, a mining project...Social licence is an ongoing process to be maintained prior to, during and post mining operations. It is more about doing the 'right thing' than meeting minimum regulatory compliance"

(https://www.bdo.global/getattachment/Insights/Global-Industries/Natural-Resources/Social-Licence-to-Operate-in-Mining/BDO_Social-Licence-to-Operate_2020.pdf.aspx?lang=en-GB)

It's fair to say that the prospect of mineral sands mining in the proposed Barrytown Flats zone has almost no social license within the community, with residents alarmed at the scale and intrusiveness of the proposals, and the threat to their businesses, health and lifestyle.

The fact that Tiga Minerals is now applying for additional exploration permits across a much larger region of the Barrytown Flats (Grey Star Tues 6 Sept 2022) makes a mockery of their statement in that same article that they "hope to work with the community...for the betterment of all concerned". They have not asked the residents, the plans get bigger and more destructive, the community does not want them operating, and these plans are top down, not driven by the community in any way. This is a continuing and escalating stress for the community, which has now only become worse. More permits, more exploration, and ultimately the mineral extraction itself is completely incompatible with the health and wellbeing of the Flats, the people, the wildlife and the ecology.

It's important to note that proceeding with forcing mineral extraction upon the Barrytown community is in direct contravention of the West Coast's own economic strategy Te Whanaketanga 2050.

The plan states that "We are vulnerable to extreme weather events, sea-level rise and disruptions due to natural disasters" (Te Whanaketanga Tai Poutini West Coast Economic Strategy 2050 p.6). So siting mineral extraction operations on low lying, receding shoreline with a high water table with an existing vulnerability to saltwater incursion is short-term thinking in direct contradiction to a global trend to move infrastructure away from such areas. Indeed, the report hints at this when it states "Te Whanaketanga focuses us on a generational shift in our economy rather than short term or siloed thinking" (Ibid, p.4).

"Active guardianship of our taonga and giving back to nature...We care for our people and place leaving our environment in a better state than we inherited it." (Ibid pp9-10) The lagoons and wetlands, freshwater streams, drinking water, all the life-sustaining functions of the Flats region is, I would argue, a taonga that far supercedes the economic returns of, for example \$200 a tonne of garnet. vast amounts of sand will need to be quarried to make these ventures worthwhile. The BarrytownJV (now Tiga) mining application aimed to dig to a depth of 15 metres across it's site. That is not protecting taonga. That is exploiting the natural environment, running roughshod over the objections of neighbours, and inviting destruction of freshwater resources.

"Our strengths in protecting and restoring the natural environment are an opportunity to build a light footprint niche economy on the Coast that develops, incubates, and shares knowledge on conservation and biodiversity restoration...Actions - Develop an International Conservation and Biodiversity Restoration Centre of Excellence" (Ibid p.15). The existing Barrytown Flats economy already operates with a light footprint on a sensitive area. A conservation centre of excellence already exists there, in the form of Conservation Volunteers which has a large native plant nursery and ecological restoration site, developed over many years. The potential impact of dust residue, heavy traffic and noise pollution would have a profound impact on this significant business. Surely it makes more sense to develop and invest in an economy that is already meeting the needs of locals, is consistent with the aspirations of the economic strategy, and protects the wellbeing of the place and it's people.

Sustainable tourism businesses feel under threat, because should full-scale mineral extraction proceed, this area will no longer be attractive to tourists. Community disintegration is occurring as people sell or leave to escape the uncertainty and possible noise, dust, vibration and disruption. Some residents have had difficulty selling homes as nobody wants to buy near a potential industrial area. People come to a place like this for the nature, the peace and quiet. Indeed, there's a perception in the community that Grey District Council has encouraged residential development in the area. To now pave the way for significant industry alongside those residents is false advertising at least.

The heavy traffic generated by the scale of mineral extraction proposals alone gives reason to encourage protection of the general rural zoning of the Flats. The Coast Road is one of

the world's finest scenic drives, and is also tight and unstable in parts. The addition of increased volumes of heavy vehicles is incompatible with the existing condition of the road.

There are concerning implications for the ecology and hydrology of this coastal ecosystem should mineral extraction proceed. Mineral sands mining requires the excavation of significant tonnes of sand, which logically invites seawater incursion into the groundwater and the land, especially if we look at projected sea level rises and increased storm surges in the foreseeable future. Such incursion would be irreparably harmful to the pockets of wetlands and lagoons along the foreshore and on the Flats. These sites provide vital food, flightpaths and breeding grounds for a number of threatened species such as the taiko. The sites would be easily disturbed by the activity of industrial machinery, water extraction, and potential seepage and leaching of byproduct toxins through tailings and settling ponds into the surrounding environment. Salt water incursion will also destroy the grass required for grazing stock.

It also needs to be mentioned that some of the minerals in the extraction zone have a radioactive quality to them, for example thorium and monazite which are extracted as part of the mining process either for their own value, or as byproduct of the search for other minerals. These elements become concentrated in the process through gravity or magnetism, and overseas are often dispersed with the tailings. Given that not only are the Flats a delicate ecological area, but that families live on the properties on either side of the proposed MEZ - hang their washing, eat from their gardens, farm livestock, drink water from streams etc. - it would seem highly imprudent to disturb, concentrate and refine such minerals next to residential properties, even with a buffer zone.

The Flats are notorious for strong prevailing winds from north, west and south, so the prospect of significant quantities of dust settling anywhere along the Flats should be of significant concern. The residue dust from ilmenite mining is said to resemble a talcum powder-like consistency. It is not hard to conclude that this would be very undesirable to have settling over the area and getting into the lagoon, the groundwater, and any of the ten streams that criss-cross the proposed MEZ. Not to mention the effect that would have on humans and livestock in the vicinity.

Because of its Nuclear Free status, New Zealand has been slow to develop legislation governing the extraction of radioactive minerals. There is very little protection under existing legislation for any neighbours of such ventures. Therefore it reinforces the logic that the MEZ on the Barrytown Flats is incompatible with its current character, population, economy and ecology and should be zoned as General Rural.

Many of the families who live on the Barrytown Flats make their livings from the land and ecology of the area. Native plant nurseries, ecotourism operators, tourist accommodation, dairy farms and animal-oriented lifestyle blocks sit appropriately within the confines of this landscape, and leave a relatively small footprint. It is not right to force them to co-exist with mineral extraction in this particular area.

The TTPP plan in its current form limits a mine site to 3 hectares, but places no prohibition on how many 3 hectare blocks adjacent to each other can be mined. This leaves the whole

area unprotected and forces significant industry on an unwilling rural community. This must be addressed.

You can't, and shouldn't be forced to put a price on peace and quiet. I've spent time in Barrytown, and it is hard to imagine the peace and beauty of the place being disturbed by the dusty roar of spiral separators, excavation machinery, and heavy traffic movements. It's a brutal thing to do to this environment and the people that care for it, and changing the zoning to a protective setting is the best way to draw a line under this activity and give the residents back their peace of mind. Community wellbeing should be at the heart of what the Te Tai O Poutini Plan is about. Protect Barrytown Flats with a General Rural zoning applied consistently across the Barrytown Flats.