

# Online submission

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<b>Wish to be heard</b>	Yes
<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 20,000m3 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 (<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.</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.
General Rural Zone	GRUZ - R18	Oppose	<p>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).</p>	Remove GRUZ R18
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. This should include provision for maximum cumulative local transport movements, noise, dust, lighting effects and effects on local wildlife and waterways.</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
STRATEGIC DIRECTION	MIN - O6	Amend	<p>MIN - O6 (a): These are worthwhile strategic objectives and should be retained.</p> <p>MIN - O6 (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 completely separate from the consenting process and not an integral part of the District Plan strategic objectives.</p>	<p>Retain Strategic Direction MIN - O6 (a)</p> <p>Remove Strategic direction MIN - O6 (b) "Allow adverse effects to be addressed by alternative mitigation measures such as biodiversity offsetting and environmental compensation."</p>
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, hydrology and community impacts was comprehensive and unequivocal. The drafting committee received several objections to this zoning on the exposure draft. Their decision to retain the proposed Barrytown mine site as a Mineral Extraction Zone appears at best mischievous and at worst incompetent.</p>	We <b>support</b> the guidelines in the draft TTPP for designating a land parcel as a Mineral Extraction Zone. We <b>do not support</b> 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.

Mineral Extraction Zone	MINZ	Amend	<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."</p> <p>This submission addresses that objective in relation to proposed expansion of sand mining activities during the life of the TTPP 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 TTPP.</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 TTPP 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.</p> <p>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 TTPP 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>	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	Amend	<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. 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.</p> <p>The link to the original Natural Character and Outstanding Natural Landscape report is here <a href="https://tpp.nz/wp-content/uploads/2022/01/NC-Combined-Coastal-TerrestrialONC-HNC-Matrix-2013.pdf">https://tpp.nz/wp-content/uploads/2022/01/NC-Combined-Coastal-TerrestrialONC-HNC-Matrix-2013.pdf</a> and the original map here <a href="https://tpp.nz/wp-content/uploads/2022/01/NC-Combined-Coastal-TerrestrialONC-HNC-Maps-2013.pdf">https://tpp.nz/wp-content/uploads/2022/01/NC-Combined-Coastal-TerrestrialONC-HNC-Maps-2013.pdf</a></p> <p>The high natural character overlay on the TTPP map does not include this area. It should be amended to include NCA 41.</p>	Modify TTPP HNC overlay on the map to include NCA 041
Rural Zones	RURZ - O2	Support		Leave rule unmodified
Rural Zones	RURZ - O5	Amend	<p>The proposed edits to RURZ - 05 provide in my opinion, a clearer, more inclusive and balanced perspective, taking account of community needs and welfare around proposed new mining sites.</p> <p>The deleted words, in my opinion, add nothing useful to the objective</p>	<p>Amend RURZ - O5 as follows to make it more balanced and inclusive:</p> <p>To support the <del>use and</del> extraction of <b>mineral</b> resources located within the rural <b>environment</b>, recognising that <b>mineral</b> resources are widespread, and that provided adverse effects <b>on existing communities</b> are <b>avoided, remedied or mitigated</b>, minimised and rehabilitation of <b>land</b> occurs following <b>mineral extraction</b>, <del>mineral extraction</del> can be appropriate in a range of locations.</p>

Rural Zones	RURZ - P8	Support		Retain this policy in its current form.
Rural Zones	RURZ - P10	Support		Retain this policy in its current form.
Rural Zones	RURZ - P18	Oppose	<p>The sentence is a tautology. It is axiomatic that "mineral resources are fixed in location" - at least on non-geological timescales.</p> <p>Mineral extraction has been an integral part of commercial activities in the Grey District for over 150 years. There is no need for an 'enabling' policy in support of it.</p> <p>All aspects relating to the consenting of mining are adequately 'enabled' through the RMA and elsewhere in the plan.</p>	Remove this policy
Rural Zones	RURZ - P19	Oppose	<p>As written this policy is entirely biased towards mineral extraction at the expense of existing businesses and communities. As such it ignores the objectives outlined in MIN - 06 (a) (vi) "The wellbeing of people and communities".</p> <p>A re-writing of the policy captures the need to have regard for the effects of mineral extraction operations on existing commercial entities and the wellbeing of local people and communities when considering the consenting of new mineral extraction activities as demanded by MIN - 06</p>	<p>Amend this policy as follows:</p> <p>"Manage conflicts between <b>proposed and existing</b> <a href="#">mineral extraction</a> activities and other <a href="#">land</a> uses by ensuring that:</p> <ol style="list-style-type: none"> <li>Standards to minimise impacts on the amenity, rural character and natural values of rural areas are met; and</li> <li><b>Mineral extraction</b> activities that are incompatible with the <b>effects and well being of local communities and businesses</b> effects of <a href="#">mineral extraction</a> activities are not established close to existing <b>communities and business</b> <a href="#">mineral extraction</a> activities.</li> </ol>
Rural Zones	RURZ - P21	Amend	This amendment has been extended to address Objective MIN 06 (a) (vi) "The wellbeing of people and communities".	<p>Amend this policy as follows:</p> <p>Require proposals for new <a href="#">mineral extraction</a> activities to provide adequate information on the establishment and operation of the <a href="#">mineral extraction activity</a>, measures to reduce and/or avoid adverse effects and rehabilitation of the <a href="#">mineral extraction</a> area, <b>and measures to avoid adverse effects on existing local commercial businesses and the wellbeing of people and communities</b></p> <p>.</p>
Rural Zones	RURZ - P23	Amend	<p>This amendment is important for avoiding the consenting of large scale sand mining operations in the future without taking into account the implications of trucking large quantities of heavy mineral concentrate to ports outside of consenting District.</p> <p>For example: the heavy mineral concentrate extracted from the proposed large-scale sand mining activities on the Barrytown Flats (Greymouth Star 22 September 2022 ) would be shipped to Greymouth or Westport. The truck movements through Buller DC to the port should also be controlled and consented to avoid conflicts of interest and unanticipated consequences for local businesses and communities in the Buller District (e.g. at Punakaiki and Westport).</p>	<p>Amend this as follows:</p> <p>Co-ordinate the approach to <a href="#">mineral extraction activity</a> consents with the West Coast Regional Council, <b>and the other District Councils</b>, particularly where <b>mineral sand mining is proposed, or</b> <a href="#">water</a> resources and soil conservation are affected.</p>
Rural Zones	RURZ - P24	Oppose	<p>The guidelines for the designation of land parcels as "mineral extraction zones" is clearly laid out in the Mineral extraction zone overview section as follows:</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>Coal mining licences under the Coal Mines Act (1979);</li> <li>Ancillary coal mining licences under the Coal Mines Act (1979); and</li> <li>Resource consents issued under the Resource Management Act (1991)".</li> </ol> <p>RURZ - P24 is an ill-defined policy to "consider including these areas..." and as such adds nothing useful to the MINZ rules which are explicit and well defined.</p>	Remove this policy

Rural Zones	RURZ - P25	Amend	The draft policy is biased towards support for extractive industries potentially at the expense of local businesses and communities. The amendments are intended to address this and provide balance.	Amend as follows:
			the phrase "as far as practicable" is too imprecise a term to be used in this context. It is unnecessary and should be removed.	<p>Maintain the quality of the <a href="#">environment</a> and amenity of areas surrounding the <a href="#">mineral extraction</a> activities <del>as far as practicable</del> by:</p> <ol style="list-style-type: none"> <li>Utilising management, mitigation and rehabilitation plans as a key tools <b>guiding day-to-day mineral extraction operations;</b></li> <li>Managing <a href="#">dust, noise</a>, vibration, access and lighting to maintain <a href="#">amenity values</a>;</li> <li>Managing traffic generation impacts on <b>local businesses and communities and</b> the operation and <a href="#">maintenance</a> of the transport network;</li> <li>Avoiding or mitigating impacts on significant indigenous vegetation, <del>and</del> significant habitats of indigenous fauna, <b>and amenities utilised by the general public, local communities and commercial activities;</b></li> <li>Ensure well located appropriately formed vehicle entrances, parking, loading and manoeuvring areas to sufficiently accommodate the requirements of the <a href="#">activity</a>;</li> <li>Ensuring buildings and structures are appropriately located in relation to boundaries and natural features and are of an appropriate scale;</li> <li>Undertaking progressive remediation to address effects during extraction operations; <del>and</del></li> <li>Requiring sites to be rehabilitated and ensuring that appropriate methods are used for this purpose: ; <b>and</b></li> <li><b>Requiring effective oversight of management, mitigation and rehabilitation plans by independent gatekeepers.</b></li> </ol>

## Documents included with submission

None				
Noise	NOISE	Oppose	<p>The noise rules in this plan have been subtly altered to allow increases in noise levels at more antisocial hours. No explanation is given for this.</p> <p>The rulings for acoustic insulation for new buildings are unnecessarily restrictive, arbitrary and confusing. As is the case with many other rules in this plan it appears to have been designed to accommodate increases in commercial activities/mining without due consideration for the wellbeing of communities.</p>	Noise rules should revert back to the those in the old plan
[General]	[General]	Amend	<p>The RMA Amendment Act that comes into force in November 2022 requires councils to have regard to emission reduction plans as well as national adaptation plans when making and amending district plans.</p> <p>The draft plan pays lip service to this (e.g. CR - 01) but has nothing to say on the requirement for emissions reductions.</p>	Include a strategic directive that complies with the recent RMA amendment to have regard to emission reduction plans as well as climate change adaptation plans.