

**SUBMISSION  
ON AN APPLICATION FOR RESOURCE CONSENT  
UNDER SECTION 96  
OF THE RESOURCE MANAGEMENT ACT 1991**

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**PART A: DESCRIPTION OF APPLICATION**

CONSENT NUMBER:

APPLICANT:

WCRC RC-2023-0133-01	Westland Mineral Sands
WCRC RC-2023-0133-02	
WCRC RC-2023-0133-03	
WCRC RC-2023-0133-04	
WCRC RC-2023-0133-05	
WCRC RC-2023-0133-06	
WCRC RC-2023-0133-07	
WDC RC240013	

DESCRIPTION OF PROPOSED ACTIVITY:

Heavy mineral mining and ancillary activities

LOCATION:

**LOCATION:** Privately owned land legally described as Lot 1 DP 3854 (RT WS8C/973)

**MAP REFERENCES:** At or about NTZM: 1429102.93E, 5261775.80N

**PART B: SUBMITTER DETAILS**

Full name/s	Clare Backes		
Postal address	[REDACTED]		
I am the owner/occupier (delete one) of the following property:	[REDACTED]		
Primary contact person/s	Clare Backes		
Email address			
Phone number/s	Home:	[REDACTED]	Business:
	Mobile:		Fax:

Signature:

**C. BACKES**

Date:

**28/03/2025**

Name (BLOCK CAPITALS):

**CLARE BACKES**

***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 wish to submit on the applications lodged with the **West Coast Regional Council**

(tick one)

☐

I/we wish to submit on applications lodged with the **Westland District Council**

☐

I/we wish to submit on applications lodged with **BOTH Councils**

☒

I/we **support** the application

(tick one)

☐

I/we **oppose** the application

☒

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

☐

I/we **wish to be heard** in support of my/our submission.

(tick one)

☐

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. These documents will be sent electronically. Only under special circumstances will a hard copy be sent.

I would like to receive an electronic copy of the s42A officers report and copy of the decision please.

☐ Hard (paper) copy

Reasons for a hard copy: \_\_\_\_\_

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

✓ ☐ Yes

My/our submission is that: (state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific proposal, or wish to have amendments made, giving reasons)

I think the consents should be declined for a number of reasons.

**Amenity values** in the area. The proposed mining, processing and trucking operation will occur 24 hours a day, 7 days a week. Topsoil stripping will occur from 0700 to 2200, 7 days a week. This industrial type activity will change the nature of the area. The current rural area is a quiet peaceful place, not filled with noise and trucks.

The normal level of noise without this mining operation is not high, with many quiet periods between vehicle movements on the road. The increased noise levels combined with the continuous nature of that noise, will not give local residents respite from the noise.

Both walkers and cyclists on the Mahinapua walk and cycleways will be disturbed by this activity, and the tracks will no longer be so attractive, which will be detrimental to the tourist industry for Hokitika and Ross. It is also contrary to the advertising slogans (you don't expect the "wilderness" to contain mining activities) for this trail which attracts many visitors.

There are 70 proposed truck movements a day, but this is an average over the week, which means that on some days it could be much higher than this. SH6 running from Mananui to Greymouth is a busy tourist road in summer, it is not built to a high standard, it has many narrow bridges on it, and in spring, summer and autumn there are lots of caravans and campervans. The road already has milk tankers travelling at maximum speed, when numerous trucks are added it will become a much more dangerous stretch of road, for locals and tourists.

**Ecological affects.** Mahināpua Creek /Tūwharewhare and Lake Mahināpua are outstanding natural landscapes adjacent to the proposed mining site. The character of the whole area will be completely changed by the intrusion of this mine.

The conclusion of the Ecological Peer Review states: *The description of the ecological characteristics and values of the site are not completely accurate. The assessment of ecological significance has not been appropriately determined for some areas of native forest within the proposed development footprint and do not accurately consider all native fauna values. The potential adverse effects to natural inland wetlands, indigenous vegetation and fauna have not been fully addressed and the proposed measures to avoid, remedy or mitigate the identified adverse effects are not adequate. Further information is required from the applicant to determine if the adverse effects of the proposed sand mining activities have been sufficiently avoided, minimised, mitigated, offset, or compensated.*

The further review of the applicant's answers state that: *Our conclusion is that the updated assessment does not accurately assess potential adverse ecological effects to native lizards, South Island fernbird, Australasian Bittern, natural inland wetland or native forest that appears to meet the criteria as a Significant Natural Area.* They recommend that further information from the applicant is required.

**(Response to Further Information\_ecology\_11Feb25).**

In particular the habitat of both the South Island fernbird and the Australasian bittern would be disturbed. Bitterns are known to avoid noise - which they wouldn't be able to avoid in this case. The Hokitika and Kapitia skink, both species listed as Threatened – Nationally Critical) are potentially present and disturbance would have a drastic effect on the viability of these species. Mining activity will cause disturbance through noise, lighting, truck movements, excavation and alteration of hydrology, and will therefore have adverse effects on at risk native species.

The applicant should provide further information to determine if the adverse effects of the proposed sand mining activities have been sufficiently avoided, minimised, mitigated, offset, or compensated.

The review of the hydrology report states that there are a lot of unanswered questions, which urgently need to be answered before any consent is granted. This proposed mining sits next to a Schedule 1 and Schedule 2 wetland. The hydrology report does not show how this wetland will be protected. All boundaries with wetlands must be increased to ensure that no damage occurs to these sensitive important sites.

The WMS website states that post-mining land rehabilitation will restore ecological processes, improve water quality and re-establish creek and lake ecosystems. This implies that there will be effects on both the lake and creeks from the mining, destroying some of the ecology – you cannot rehabilitate disturbed

landscapes and the ecology to their original states, and it would take many tens even hundreds of years to “restore” the ecological values.

The applicant intends to clear native vegetation. The proposal will result in the clearance of approximately 4.2ha of indigenous vegetation over a 10-year period, exceeding the permitted limit of 5000m<sup>2</sup> per site in total over any continuous three-year period. This is a non-complying activity. These limits were put in place to protect indigenous vegetation – there seems no reason to allow them to be ignored in this case. The miners have chosen to mine native vegetation, perhaps they should only be allowed to mine in the paddock, not to destroy native vegetation and intrude on wetlands.

The reports note the presence of wetland areas within the paddock which will be destroyed forever by this mining operation. There appears to be no mitigation offered for this.

However, overall it would seem that the threat to the local ecology and landscapes as well as local amenity values are too large to be ignored. Thus these consents should be declined.

**Sustainability.** It would be refreshing to see the Councils ask the fundamental question of “How does this proposal stack up?” This is WMS’s second potential sand mine of the Coast, surely it would make more sense to refuse a consent until all the problems with the first mine have been resolved and it has been shown to be a success- both economically and environmentally.

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

Decline all the consents, ie decline the application in its entirety

I/we have attached additional information/reports to support my/our submission

☐ Yes

### Important information – please read carefully

#### 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 Westland 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.



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