

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

Office Use Only



PART A: DESCRIPTION OF APPLICATION

CONSENT NUMBER:

APPLICANT:

RC-2023-0133-01 Mananui Westland Mineral Sands RC-2023-0133-02 RC-2023-0133-03 RC-2023-0133-04 RC-2023-0133-05 RC-2023-0133-06 RC-2023-0133-07 RC240013	Mananui Westland Mineral Sands
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DESCRIPTION OF PROPOSED ACTIVITY:

Mineral Sand Mining

LOCATION:

713 Ruatapu Road, State Highway Six, Mananui Lot 3 DP 366769 BLK VII Mahinapua Survey District
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PART B: SUBMITTER DETAILS

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

Signature:	Date:
[REDACTED]	2 April 2025
Name (BLOCK CAPITALS):	
SUZANNE HILLS	

*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.

☐ 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 oppose the submission on the following grounds:

1. As per requirements in the NPSIB and SNA criteria of the WCRPS, identified SNAs are not adequately protected, and potential SNAs have been inadequately assessed and identified.
2. Forest fragments have not been adequately assessed; effects management measures need to be appropriate to the ecological and climate value of the forest fragments.
3. Natural inland wetlands within the mine footprint have not been identified and delineated (as required to MfE wetland delineation procedures).
4. There is no functional need to operate in or within 100m of natural inland wetlands – this applies to natural inland wetlands within and adjacent to the site. 10m setbacks from adjacent wetlands are inadequate to protect wetland health and ecology, and do not meet NES-FW s45D(6), under which consent cannot be granted.
5. Bats, lizards and birds, including the cryptic Australasian bittern and the South Island fern bird are not adequately protected from noise, lighting, dust, human activity and the general disturbance effects of the proposal.
6. The Westland petrel/ tāiko is affected by light disturbance with downed fledglings found from Hokitika to Westport. There is no lighting plan to avoid adverse effects on the tāiko as required by the NZCPS. Nor for bats.
7. The adverse effects both on and of climate change have not been adequately considered.
8. The proposal is greenhouse gas emission intensive and would have adverse effects on climate change from diesel fuelled trucking and mining machinery. Carbon emissions from the proposal would generate more than minor effects and contribute to the myriad of adverse effects from global warming and climate breakdown.
9. The application lacks an emissions report, and this critical lack of information means the proposal cannot be measured against the climate change provisions of the RMA Amendment Act 2020 and the Climate Change Response [Zero Carbon] Amendment Act. The proposal is contrary to the imperative of rapid decarbonisation and transition to a low emission economy.
10. Proffered conditions are inadequate and incomplete; key outcomes, standards and limits with respect to the management of adverse effects are missing or insufficient. "Deemed certified" conditions must be removed; they are almost certainly unlawful; this was well traversed in the TiGa hearing and yet they have again appeared in these conditions.

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

For the reasons set out in this submission and which will be expanded on at the hearing, I consider that:

- The proposal will have significant adverse effects on the environment which cannot be adequately avoided, remedied or mitigated.
- The proposal is not consistent with the Resource Management Act, and many national, regional and district level objectives and policies designed to protect the environment.

I seek these resource consents are DECLINED in their entirety.

Thank you for the opportunity to submit.

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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