

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

Office Use Only



**PART A: DESCRIPTION OF APPLICATION**

CONSENT NUMBER:

APPLICANT:

RC240013, etc

Westland Mineral Sands

DESCRIPTION OF PROPOSED ACTIVITY:

Mineral Sand Mine Operation

LOCATION:

713 Ruatapu Road, State Highway Six, Mananui Lot 3 DP 366769 BLK VII Mahinapua Survey District

**PART B: SUBMITTER DETAILS**

Full name/s	Christopher James Cromey		
Postal address	[REDACTED]		
I am the owner of the following property:	As above		
Primary contact person/s	Chris J Cromey		
Email address	[REDACTED]		
Phone number/s	Home:	[REDACTED]	Business:
	Mobile:	[REDACTED]	Fax:

Signature:

Date:

02/04/25

Name (BLOCK CAPITALS):

CHRISTOPHER JAMES CROMEY

*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**

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

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

(tick one)

☐
☐
☒

(tick one)

I/we **support** the application

☐

I/we **oppose** the application

☒

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

☐

*(tick one)*

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

☒

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 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)

**1. A setback of 140 m is required from the schedule 2 wetland, as I could not find evidence in the Dust Management Plan that the proposed method for dust deposition monitoring along the boundary would be effective**

I found inconsistencies in the approach of the Dust Management Plan (DMP), and definitions in the DMP that did not match standard definitions. These are concerning.

From the Independent Commissioners' Decision on a public consultation on the TiGa Barrytown mineral sands mining consent application[1], the commissioners stated:

*'If offsite dust discharges do occur, then conditions relating to the use of dust deposition gauges will enable any significant discharges to be identified and responded to.'*

So it follows that if an uncontrolled dust event does occur it is expected that monitoring at the boundary will detect this. This I also find concerning.

In the context of this application for the Mananui mineral sands mine, I considered the challenge of using a dust deposition gauge to monitor the eastern boundary between the mining activity and the schedule 2 wetland. I could not satisfy myself that the proposed dust monitoring would fulfil the commissioners' requirement above.

This means that if the applicant cannot prove that the dust monitoring at the boundary will be effective, then a 140 m setback is required from the schedule 2 wetland which is very close to, and downwind of the mining activity.

With regards to dust monitoring, I am also concerned about the property to the NW of the mining area, the state highway and the area to the south of the mining area. This is because pre-frontal winds that follow prolonged dry spells of direction NE through to SE, are often overlooked when considering dust control. Yet these winds can be strong and gusty with low humidity and fulfil the threshold criteria for dust suspension. In this specific scenario, the property to the NW, the state highway and the area to the south would be downwind of the mining activity and totally reliant on effective dust monitoring to detect uncontrolled dust discharges. Unless the applicant can show that dust monitoring gauges will be effective, 140 m setbacks are also necessary from the property to the NW, the state highway and the southern boundary.

**2. Trucks, trucks, trucks – maximum average traffic movements per week in the consent conditions are not strict enough**

The consent conditions need to be improved so that absolute maximums are specified for the hour, and for the day. As the consent conditions are currently written, the consent holder on a particular day could undertake 70 truck movements in one single hour, and be within consent conditions. Although this is an extreme example, 12 truck movements in one hour on a particular day is also within conditions. 'Average maximums' should be deleted from conditions.

### **3. Avifauna and bats that live in the surrounding area can only be disturbed by the mining activity**

The proposed mining activity is in very close proximity to schedule 2 wetlands and an ecological reserve, and the avifauna and bats are not adequately protected from noise, lighting, dust, and human activity. The proposal seems to imply that the wildlife can just go elsewhere as there is plenty of habitat nearby.

Lake Mahinapua is not shown on any of the maps that I viewed in the application.

### **4. The Westland petrel/ Tāiko is affected by lighting and downed fledglings most likely perish if they are not rescued**

I could not find a lighting plan to avoid adverse effects on the tāiko. Having been involved in rescuing of downed tāiko during the fledgling season, I have seen first hand how easy it is for tāiko to be affected by lighting, and subsequently perish.

### **5. It is my understanding that the local ports have yet to become fully operational for mineral sands export, or even evidence presented that it can be achieved long term and who will pay for it**

I am concerned as many other people in the region appear to be, the continuing saga with the local ports and what will happen next when the 'Manahau' finally returns from the ordeal and embarrassment of being up on the beach.

### **6. I couldn't find in the hydrological assessments an example of how the model performed when applied to a similar mining operation in an area with similar rainfall and geology**

Q. Has the hydrological modelling been validated at a site where there is a similar mining operation, with rainfall and geology similar to the proposed site?

If the answer is no, then by applying a model prediction confidence index, the modelling can only score a maximum of 7 out of 10, regardless of the complexity of the model and the detail of local measurements. For a model to score more than 7, it has to be validated on site over the lifetime of a fully operational mine similar to the one proposed. Without this validation at an operating mine site, uncertainty exists in the hydrological model predictions.

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I expect to provide additional information in support of my submission at the hearing.

#### References

1. INDEPENDENT COMMISSIONERS' DECISION ON APPLICATION BY TIGA MINERALS AND METALS LIMITED TO MINE AT BARRYTOWN. Dated 29 April 2024. Point 600, p 154.

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

**I seek the following decision from the Local Authorities: that the application be declined 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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