

**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:

RC2023-0133 & RC240013	WMS
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DESCRIPTION OF PROPOSED ACTIVITY:

Sand Mine

LOCATION:

Mananui

PART B: SUBMITTER DETAILS

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

Signature:	Date:
[REDACTED]	2 APRIL 2025
Name (BLOCK CAPITALS):	
MARIE ELDER	

*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)

☐
☐
☒

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.

(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

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.

☐

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

Submission vs WMS Mananui resource consent mine application

Submitter: **Marie Elder**

[REDACTED]

I **oppose** this application

I **DO wish to be heard** in support of this submission

Key concerns:

- Proximity to Lake Māhinapua
- Hours of mining and processing
- Trucking on SH6
- WMS track record

PROXIMITY TO LAKE MĀHINAPUA

1. The WCRC website summary of the application reads in part: "*The site is ... modified farmland located adjacent to State Highway 6 at Mananui. There are **natural inland wetlands and forest bordering the site to the east and a Department of Conservation ecological reserve to the South.***" [my emphasis]
2. I am concerned about Lake Māhinapua, adjacent to the SE corner and home to many species of wildlife including kōtuku [conservation status nationally critical¹].

¹ <https://www.nzbirdsonline.org.nz/species/white-heron>



Aerial view of the site showing the proximity of Lake Māhinapua – Application p7/96

3. The application's Ecological Report appears to view surrounding habitat including Lake Māhinapua Scenic Reserve not as areas of biodiversity which might be adversely affected but rather as places to soak up the damage:

*"All bird species recorded (or postnatally present) within the site, including those using forest fragments in pasture, are mobile and able to utilise similar habitat (which is locally abundant) over relatively large areas for food and breeding (home range). It is considered highly unlikely that any native bird species which utilise the affected habitat, are restricted to just that affected area, as species are not habitat limited locally. The indigenous vegetation and habitat being cleared, while having a total area of 4 ha, is highly fragmented and is both poor quality habitat, and comprises only a small percentage of native forest available as habitat within the wider protected area network of Māhinapua Lake Scenic Reserve and the Hokitika Ecological District."*²

4. The above extract could be summarised: *"If avian species on site are disturbed by the mining, they have other places to go nearby, so that's okay"*. It seems assumed disturbed birdlife will simply be able to take refuge in neighbouring habitat. I am concerned full consideration may not have been given to adverse effects of this acknowledged disturbance [food availability; existing populations; breeding patterns etc], and the potential disturbance [noise, dust, human and heavy machinery and vehicular activity] to existing wildlife in neighbouring habitat.
5. I share ecological concerns raised by Tony Payne, Principal Ecologist, in his peer review.

HOURS OF MINING AND PROCESSING

6. *"The proposed mining, processing and trucking operation will occur **24 hours a day, 7 days a week**. The heavy mineral concentrate will be transported off the site **to the Port of Greymouth for direct export**."* - WCRC website application summary [my emphasis].
7. This proposal would mean no respite whatsoever for residents, visitors or wildlife. No respite from the considerable noise, dust, vehicular and human movement associated with mining.
8. I consider a plan to mine, process and truck around the clock, seven days a week, in a scenic and residential location such as this, to be wrong.

24/7 TRUCKING ON SH6

9. The plan to use SH6 for heavy trucking 24/7 can best be described as cavalier.

² Ecological report p61

10. *"Truck movements associated with removal of heavy mineral concentrate to and from the site are limited to 70 per day and 6 per hour (both averaged over a one week period)."*³
11. *"both averaged over a one week period"* makes a nonsense of the word *"limited"* and of any notion of *"6 per hour"*. A weekly average could mean 50 or more trucks in any one hour – day or night - if there's been a slow day earlier in the week. The only meaningful clause would be an hourly maximum of, for example, 5 movements per hour.
12. All-night trucking would be a heinous increase in noise and vibration for residents and visitors along SH6, a health risk due to sleep loss, an unthinkable intrusion on residential peace and quiet and a serious detraction from the visitor experience, threatening the livelihood of local people who work in tourism.
13. Any permitted trucking should be limited to daylight hours, and weekdays only, to at least allow for some respite.

TOURISM

14. Heavy trucking, whatever hours ended up being permitted, would have a negative effect on tourism. The highway surface would be damaged – and we can't expect the national fund of road-user charges to cover this - and tourists would soon be warning each other on social media of trucking and road surface hazards.
15. The placement of proposed buildings adjacent to SH6, with a *"footprint of appropriately [sic] 3860m², including a Wet Concentrator Plant being (17m in height and 2000m²)"*⁴ would create an eyesore right next to the highway. A 3m bund will not obscure a 17m high processing plant.
16. Existing views across landscape to forested wetlands would be compromised. The proposed bund along the length of the highway, itself an acknowledgement of the ugliness of a mine site, would obscure existing views, lessening landscape values. Plantings on the bund would help but, being an artificial construct, would still be of lesser aesthetic value than existing views.
17. The Treetops Walkway is one example of a local tourism venture which would suffer. Visitors, who have paid good money to view the natural landscape from above, would be disappointed to see or hear a mining operation across the lake. The Treetops website might need to be amended to include sights and sounds of mining, as it currently says:⁵

"The area is a birdwatcher's paradise, with a wide range of beautiful and rare birds calling it home. You will be enthralled by the sounds of parakeets, tūī, bellbirds and kererū all around you. You will also see a plethora of water birds, such as grey and mallard ducks and black swans, with sightings of fernbirds. Majestic white herons (kotuku) can also be found in the area, while bitterns and the southern crested grebe can also be seen now and then."
18. Reputational damage to the area from this mine would render the highly successful and acclaimed WCRC 'Untamed Natural Wilderness' marketing campaign nonsensical.

WMS TRACK RECORD

19. *"Heavy vehicles carting HMC will use the State Highway through Hokitika to the Port of Greymouth."*⁶ Then it will *'barge out of Port Greymouth'*⁷. This is optimistic at best and could well be fanciful given the WMS barge Manahau came to grief on Carters Beach in 2024 and as of April 2025 is still awaiting repairs. The Greymouth bar is rather more problematic than Carters Beach.

³ Application p9

⁴ WCRC website summary introduction

⁵ <https://treetopsnz.com/be-enthralled-by-the-lake-mahinapua-scenic-reserve/>

⁶ Application p12/15

⁷ WCRC website summary introduction

20. If barging the HMC proves impractical, as seems likely based on the WMS Carters Beach experience, those 70 trucks rumbling through Hokitika could end up going further than Greymouth. Perhaps WMS have in mind the Rapahoe railhead as back up, or TiGa's proposed secondary processing plant at Rapahoe.
21. I ask our decision-makers to think carefully about whether we want to turn our Coast Road into an even more extensive and crowded mining haulage route than it already could be with TiGa's multi-mine Fast Track proposals on the Barrytown Flats. It all has to stop somewhere.
22. Decision-makers could also talk with Buller District Council [BDC] about how little there is to show in Westport for the Council's substantial investment in WMS in return for their promise of port improvements and increased resilience.
23. Decision-makers could perhaps wait and see if the promised revenue from TiGa's operations is forthcoming before committing the Coast to even more mining proposals with unproven economic benefits and short term economic input at best.

RELIEF SOUGHT - CONCLUSION

24. **That the application be declined in its entirety** due to adverse effects on wildlife; Lake Māhinapua Scenic Reserve; quality of life for residents and visitors; and the safety and efficiency of SH6, and because of the unproven economic benefits of WMS mining operations.
25. Without prejudice to my belief this application should be declined in its entirety, were consent granted there should at least be conditions requiring:
 - Mining activities, including trucking, to be during daylight hours only i.e. sunrise to sunset
 - Mining and trucking to be Monday – Friday only
 - No more than five truck movements in any one hour
 - 100m setbacks from all boundaries: wetlands, neighbouring properties; SH6; Lake Māhinapua
 - All setbacks and bunds to be planted with plants sourced from the local ecological district, and fenced

Thank you for the opportunity to submit

Marie Elder
Punakaiki

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

That the application be declined in its entirety

I have also attached my submission as a pdf document filename 'WMS mine submission Marie Elder'

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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