

Before the Hearing Commissioners
Appointed by the Grey District Council
and West Coast Regional Council

Under the Resource Management Act 1991

In the matter of Resource consent applications by TiGa Minerals and Metals
Ltd to establish and operate a mineral sands mine on State
Highway 6, Barrytown (RC-2023-0046; LUN3154/23)

Summary Statement and Rebuttal Evidence of Gary Charles Tear

2 February 2024

Applicant's solicitor:
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**anderson
lloyd.**

Summary of evidence

- 1 My name is Gary Charles Tear
- 2 I prepared a statement of Coastal Engineering evidence dated 19 January 2024. My qualifications and experience are set out in that statement of evidence.
- 3 I repeat the confirmation given in that statement that I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court.
- 4 My role in relation to TiGa Minerals and Metals Limited's (**TiGa**) application (the **Application**) has been to provide coastal engineering and coastal processes advice since December 2023.

Summary

- 5 The land behind the beach and the lagoons has no effect on, and is independent of the beach processes. The Application site is 250 m from the high water tide mark on the beach with a 20 m setback from the edge of the lagoon. At the estimated conservative rate of combined erosion – existing rate of erosion plus SLR induced recession - it would take in excess of 100 years for the sea to reach the location.
- 6 The mining operation will have no potential effect on erosion of the coast being behind the natural barrier and well setback. The risk of inundation for the 2130 planning horizon applies for both the existing topography and the reinstated topography. The reinstated level would be an average of 0.8 m below the existing level across the site, but along the western end it would be reinstated to at or above the existing level as per the rehabilitation plan.
- 7 Filling the mining excavation with the original sand minus the HMC content does not increase the coastal erosion potential once the sea reaches the location because the sand is essentially the same as the sand extracted, and normally consolidated under self weight. The rate of erosion would be close to the same for the refilled area as for the original ground.
- 8 The mining operation will have no impact either in the short-term or the long-term on coastal processes. The proposed mine areas are well clear of the dynamic coastal area being located landward of the lagoons and have no influence on the coastal processes. The mine will not exacerbate coastal erosion or inundation of surrounding properties.

Response to Dr. Renwick's paragraphs 24-28

- 9 The SLR estimates quoted by Dr. Renwick are the same as reported, and allowed for, in my evidence being taken from the Ministry for the Environment's 2017 coastal guidance.
- 10 The application site has natural protection from wave action and the effects of SLR in the form of a MSGB (Mixed Sand Gravel Beach), composite beach form, a wide sandy beach apparent at low tide with a steep gravel bund, natural barrier at the top of the beach. Barrier beaches in a natural state are a resilient feature able to gradually shift landward in response to rising sea-level while retaining their height and integrity so the existing protection from wave action for the hinterland behind the MSGB will continue as SLR continues to increase.
- 11 As climate change induced SLR accelerates, as indicated by the increasing slope of the SLR graph in figure no.1 of my evidence, a point may be reached later this century where the rate of SLR exceeds the natural ability of the beach to respond. However, that does not preclude the possibility of beach nourishment using gravel extracted from West Coast rivers to boost natural beach processes and defences.
- 12 The effects of climate change on beach processes are uncertain to the extent that increased extreme rainfall events and associated landslips may substantially increase the supply of sediment to the coast, much as occurred after earlier earthquakes on the Coast. The climate change induced SLR effects will occur irrespective of the mining operation.

Additional Information

- 13 The results of the drone survey undertaken on the 16th of January were reduced after my original evidence was submitted and are attached with this Summary Statement and Rebuttal evidence as a contour plan of the coastal edge of the Application site, drawing no. DR-231202-004. They assist to illustrate my response to Dr Renwick. The heights are in terms of NZVD 2016. The zero is 0.101 m below Mean Sea Level (MSL). MHWS is 1.34 m above NZVD 2016 zero, MLWS is 1.57 m below NZVD zero. Two cross sections referenced on the contour plot, A and B, are shown on drawing no. DR-231202-005.
- 14 Cross section B is where washover occurs and the bund is wider and flatter than the gravel barrier further north where the height of the gravel bund is approximately 6 m above NZVD 2016 zero.
- 15 The historical coastline photographs in my evidence covered the area in front of the Application site. Drawings no. DR-231202-002 and 003 show the length of the Barrytown Flats coastline with the historical vegetation lines and magnified excerpts with measurements of the coastal recession allowing recession rates to

be calculated. These average out at 1m/year north of Canoe Creek and 1.7 m/year south of Canoe Creek.

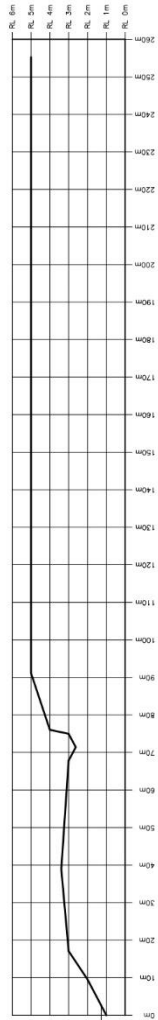
Conclusion

- 16 Dr. Renwick's evidence doesn't change my conclusions, SLR will happen but the mining operation will not exacerbate the situation in terms of either inundation or SLR induced recession, this will occur irrespective of the mining operation. The MSGB natural defence is a resilient form of natural protection, more so than sand beaches, and can be readily supplemented some time in the future if required. The additional information added via this supplementary evidence adds detail to my earlier evidence and assists to illustrate my response to Dr Renwick.

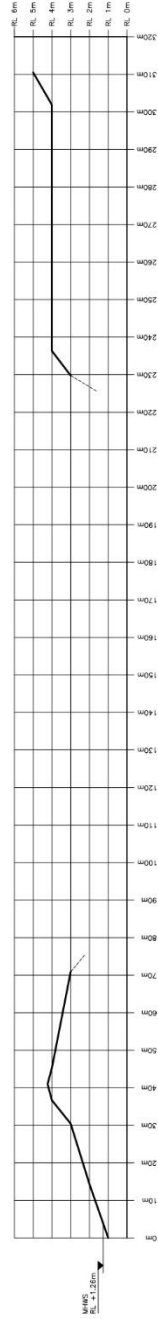
A handwritten signature in blue ink, appearing to read 'G. Teear', with a large, stylized flourish extending downwards and to the left.

Gary Charles Teear

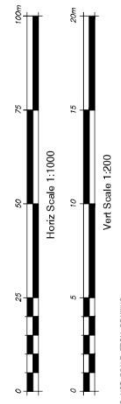
Dated this 2nd day of February 2024



SECTION A
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 VERT: 1:200
 DATE: 01/24

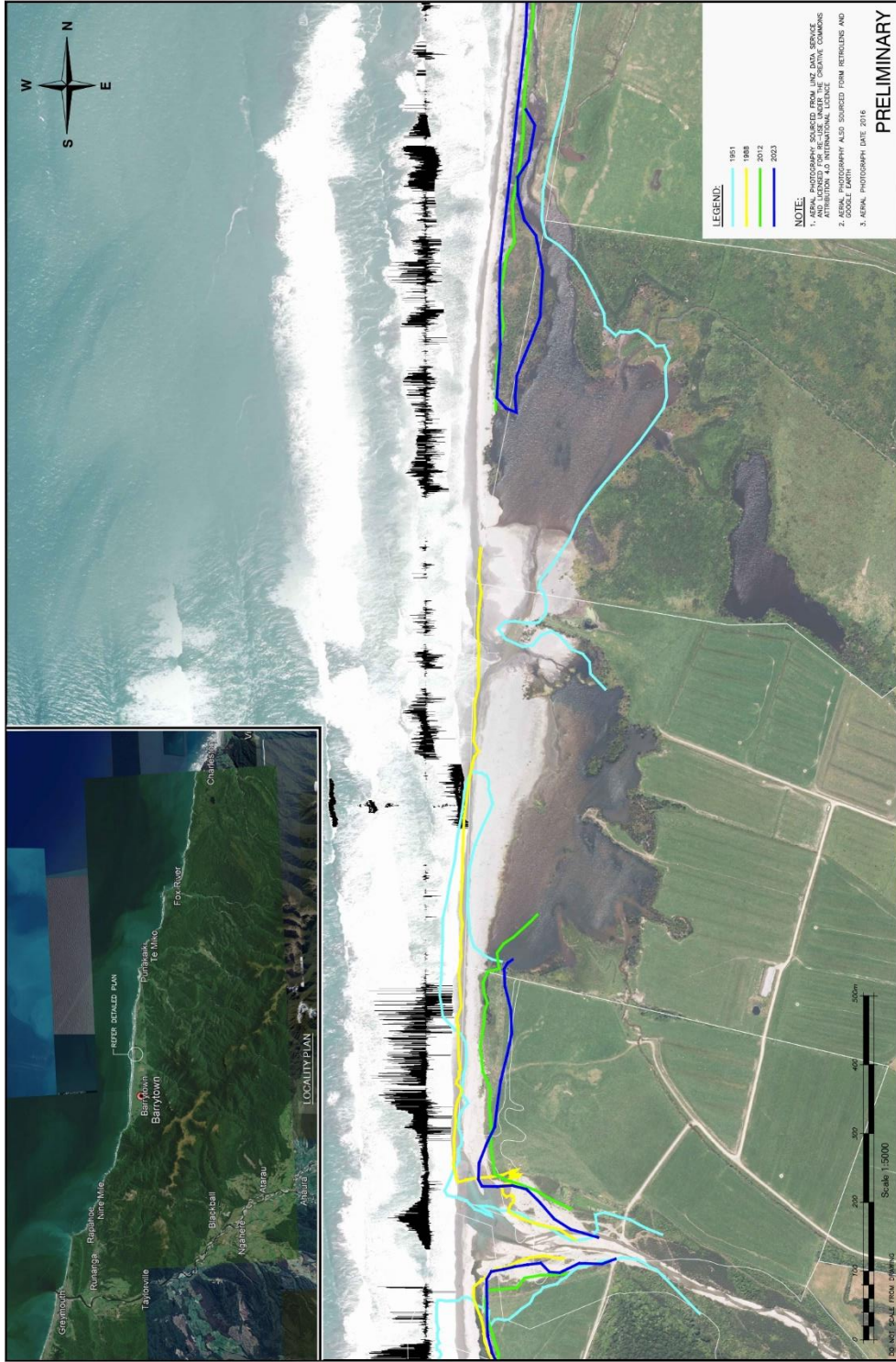


SECTION B
 HORIZ: 1:2000
 VERT: 1:200
 DATE: 01/24



NOTE:
 1. AERIAL PHOTOGRAPHY AND TOPOGRAPHY SUPPLIED BY DRONSCOPE LIMITED. SURVEY DATE: 24/01/2024
 2. DRAWING COORDINATES ARE IN TERMS OF NTPM 2020
 3. ALL HEIGHTS ARE IN TERMS OF NZOD 2016
 4. DESIGN LEVELS ARE BENCHMARK CODE: A001
 5. SPOT HEIGHT DENSITY = 2 POINTS PER METRE (0.2m GRID)
 HIGHER DENSITY DATA IS AVAILABLE UPON REQUEST.
 6. MWS = APPROX +1.27m NZOD2016
 MWS = APPROX +1.07m NZOD2016

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LEGEND:

- 1991
- 1998
- 2012
- 2023

NOTE:
 1. VEGETATION SOURCES FROM AIR PHOTOGRAPHY AND FIELD CHECKS FOR HISTORICAL VEGETATION COMMONS ATTRIBUTOR 4.0 INTERNATIONAL LICENSE
 2. GOOGLE EARTH
 3. KERNAL PHOTOGRAPHY DATE: 2016

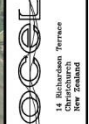
PRELIMINARY

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TIGO METALS AND MINERALS
BARRYTOWN SAND MINING SITE
PLAN OF HISTORICAL EDGE OF VEGETATION LINES

This drawing shall be voided if not a copy of the original drawing as issued by the Engineering Council of New Zealand.

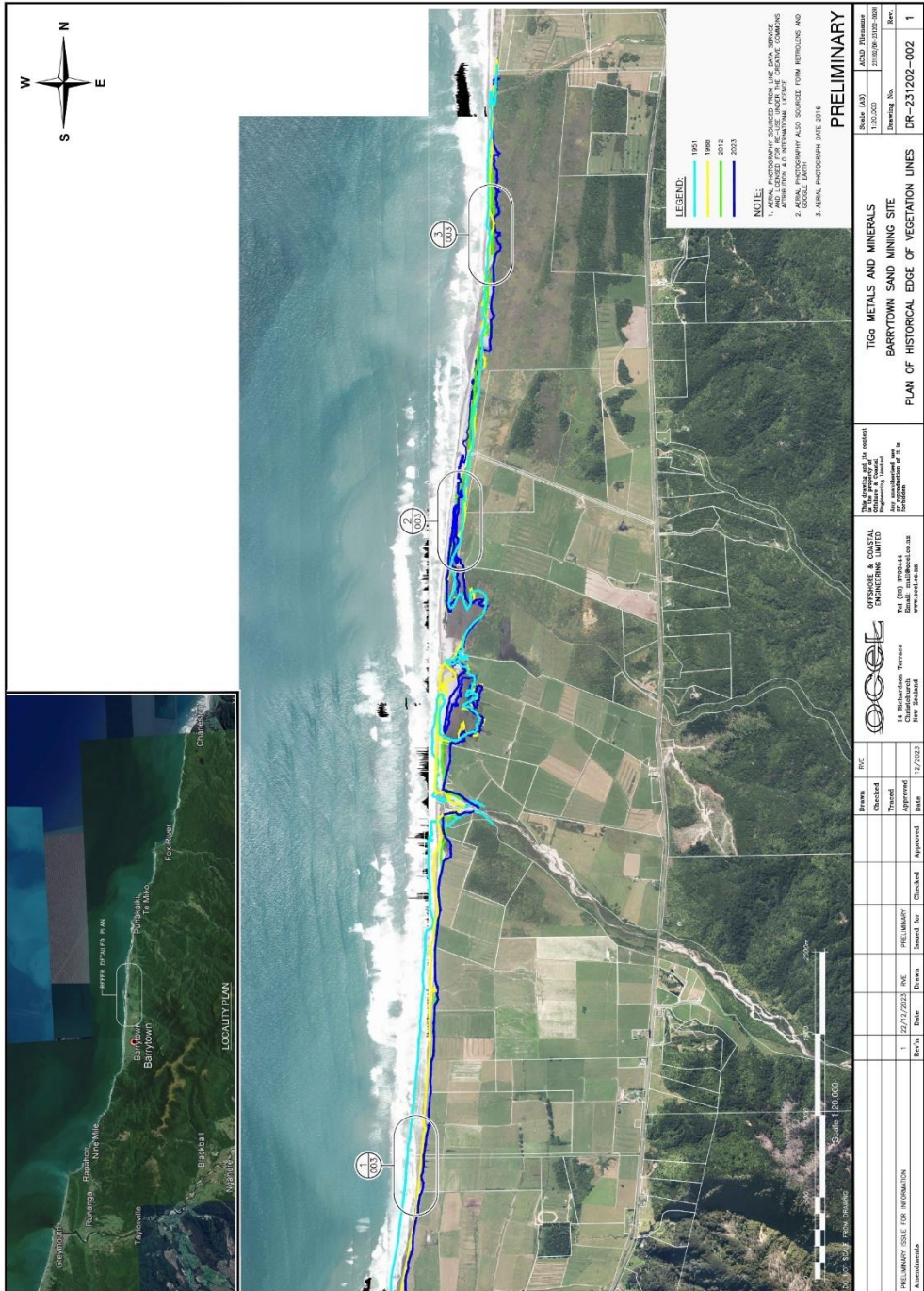
OFFSHORE & COASTAL ENGINEERING LIMITED
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 www.oceel.co.nz



Drawn	Checked	Rev

PRELIMINARY ISSUE FOR INFORMATION	Rev	Date	Drawn	Checked	Approved	Date
1	22/12/2023	REV	PRELIMINARY			12/2023

Approved: _____
 Date: _____



LEGEND:

- 1981
- 1991
- 2002
- 2016

NOTE:
 1. VEGETATION INDICES DERIVED FROM AIRSAT, SPOT, LANDSAT, AND MODIS FOR THE COAST GUARD TERNARY COASTING PROGRAM TO MONITOR ECOSYSTEM HEALTH.
 2. LOCAL LIGHTNING AND SURGES FROM HURICANE AND TROPICAL STORMS.
 3. AERIAL PHOTOGRAPH DATE: 2016

PRELIMINARY

TIGO METALS AND MINERALS
BARRYTOWN SAND MINING SITE
PLAN OF HISTORICAL EDGE OF VEGETATION LINES

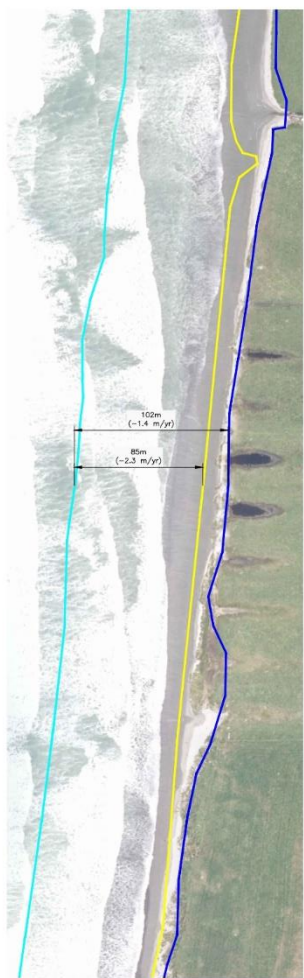
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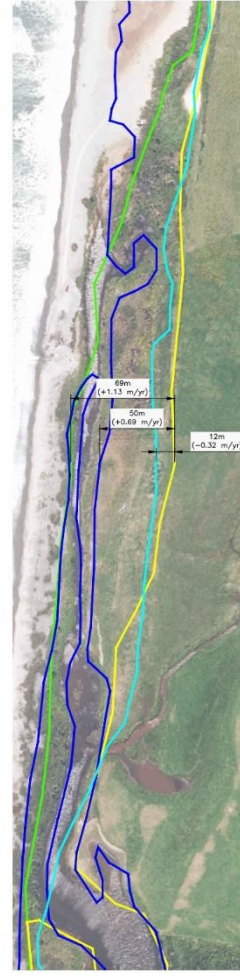
PRELIMINARY DRAWING FOR INFORMATION
 DRAWING NO. DR-231202-002

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DETAIL 1
Scale 1:2500



DETAIL 2
Scale 1:2500



DETAIL 3
Scale 1:2500

LEGEND:

1991
1998
2012
2023

NOTE:
1. THIS DRAWING IS A PRELIMINARY DESIGN AND SHOULD NOT BE USED FOR CONSTRUCTION.
2. ALL DIMENSIONS ARE TO THE CENTERLINE OF THE ROAD.
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1.	20/01/2024	REV	PRELIMINARY	Issued for	Checked	Approved	12/2023
Amendments							

<p>OFFSHORE & COASTAL ENGINEERING LIMITED 14 Richardson Terrace New Zealand Tel: (06) 3906444 www.oceel.co.nz</p>	<p>This drawing is the work of the company of Offshore & Coastal Engineering Limited an incorporated company in New Zealand</p>	<p>TIGO METALS AND MINERALS BARRYTOWN SAND MINING SITE DETAILED PLAN OF HISTORICAL EDGE OF VEGETATION LINES</p>	<p>Sheet: 003 1:2500 22/08/2023</p>	<p>ACID PLUMAGE 22/08/2023</p>
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