

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, and associated activities on State Highway 6, Barrytown (RC-2023-0046; LUN3154/23)

Joint Witness Statement – Landscape

29th January 2024

Introduction

- 1 This joint witness statement has been prepared to record the outcome of witness conferencing on landscape and visual matters arising from the proposed mineral sands mine and associated activities at State Highway 6, Barrytown (**Application and Application Site**).
- 2 Witness conferencing has taken place between:
 - (a) **Mrs. Naomi Crawford** of Glasson Huxtable for TiGa Minerals and Metals Limited (**TiGa**).
 - (b) **Mr. Rhys Girvan** of Boffa Miskell for Grey District Council (the **Council**).
- 3 Mr Girvan and Mrs Crawford met on the 17th of January 2024 to understand each other's views. Formal expert conferencing did not take place at this time due to the possibility of another landscape expert providing evidence on behalf of the submitters.
- 4 The above expert did not eventuate. As such, Mr Girvan and Mrs Crawford met again 1.5 weeks later on the 29th of January 2024 to prepare this joint witness statement.
- 5 In preparing this statement, the expert witnesses have read and understood the Code of Conduct for Expert Witnesses as included in the Environment Court of New Zealand Practice Note 2023.

Matters agreed

- 6 The entire Site is in the coastal environment.
- 7 The Site is not an outstanding natural feature or landscape. Adverse effects on such areas identified beyond the Site will be low (less than minor).
- 8 The Site is not an area of Outstanding Natural Character.
- 9 The Mine Disturbance Area does not contain high natural character. Beyond the Mine Disturbance Area, parts of the Site have higher natural character, (i.e. Canoe Creek Lagoon, Canoe Creek).
- 10 The nature and level of landscape character and visual effects which result from the project during operation and following project completion are now largely agreed as per Figures 2 and 3 of Mrs Crawford evidence.
- 11 There are adverse effects on landform and natural character which will occur during the mining operation. Whilst we agree these are not significant, the level at which effects occur is slightly different in the opinion of each expert.

- 12 In the long term, following project completion we agree there is potential for low positive (beneficial) effect on natural character.

Matters not agreed

- 13 Mrs Crawford considers natural character effects are low-moderate adverse (minor) during the mining operation with mitigation for the reasons explained in paragraph 58 of her evidence.
- 14 Mr Girvan considers during the mining operation there is potential for moderate adverse natural character effects (more than minor but not significant). Mr Girvan considers there are further opportunities to restore natural character outside the Mining Disturbance Area but within the Site during mining operation within the context of the coastal environment which would further reduce potential natural character effects.

Conditions

16. We discussed the proposed areas of planting and intent to maintain these in the long term as part of ensuring effective mitigation. We agree the following amendments:


19.3

No later than 12 months after the completion of mining, the remaining areas of the proposed wetland area (Clean Water Facility and Future Wetland Extension) shown in the attached "Landscape Mitigation Planting Plans" prepared by Glasson Huxtable Landscape Architects dated January 2024 shall be constructed and planted.

19.7

All planting shall be maintained ~~for the duration of consent~~ in perpetuity. Any plants that are dead, diseased, fail to thrive or are damaged shall be replaced with a same or similar plant species within the following planting season within the duration of the consent.

Dated 29th January 2024


Rhys Girvan.


Naomi Crawford.

