

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
Limited to establish and operate a mineral sands mine on
Barrytown Flats (RC-2023-0046 and LUN-315/23)

Memorandum of Counsel for the Applicant (No.2)

27 February 2024

Applicant's solicitor:

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May it please the Panel

- 1 During the resumed AVL hearing on 26 February 2024, we indicated that the Applicant was considering the provision of additional information raised in the presentation of the Director-General of Conservation (D-GoC).
- 2 Minute 8 of the Hearings Panel invited the Applicant to provide any additional information in relation to GHGs, lighting and the Westland Petrel by Monday 4 March 2024.
- 3 A Lighting Management Plan, which will include a lighting layout plan, can only be made available by Friday 8 March 2024. The plan requires input and coordination from electrical and design engineers, a health and safety expert, a lighting consultant and Dr Bramley.
- 4 Accordingly, this Memorandum confirms that the Applicant will provide the following information by 8 March 2024 to be posted on the Council website, and for comment by D-GoC and the relevant Westland Petrel experts:
 - (a) A Lighting Management Plan, including a lighting layout plan, within an updated draft Avian Management Plan;
 - (b) Staff shift times and vehicle movements in hours of darkness;
 - (c) Updated conditions of consent;
 - (d) An accompanying memorandum to explain any residual lighting during the hours of darkness, and the proposed response to any groundings of Westland Petrel through the proposed revised conditions, and the draft Avian Management Plan; and
 - (e) A summary of emissions from the proposal, and a comparison of these emissions against published New Zealand emissions totals (via a supplementary statement prepared by Mr Miller).



Alex Booker / Alex Hansby
Counsel for the Applicant

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