

**Before Southland Regional Council
and Gore District Council**

In the matter of the Resource Management Act 1991

And

In the matter of the hearing of submissions on applications for resource consent
by Waikaka Gold Mines Limited to establish and operate a
mineral extraction activity (APP-20242608 and LU 24035)

Joint Witness Statement in relation to Landscape Matters

Dated 27 November 2025

Hearing Date 3 December 2025

Expert conferencing held on: 27 November 2025

Venue: Online (Microsoft Teams and by email exchange)

Attendance

1. The participants were:
 - (a) Ben Espie – landscape witness for Waikaka Gold Ltd (**Applicant**);
 - (b) Mike Moore – landscape witness for Gore District Council (**GDC**).

Basis of attendance and Environment Court Practice Note 2023

2. The participants agree to the following:
 - (a) The Environment Court Practice Note 2023 provides relevant guidance and protocols for the expert conferencing session;
 - (b) They will comply with the relevant provisions of the Environment Court Practice Note 2023 and this joint witness statement (**JWS**) has been prepared in accordance with clause 9.5 of that document;

- (c) This statement is to be provided to the Hearing Panel following signing in accordance with the Environment Court Practice Note 2023.

Key Information Sources Relied On

- 3. The following material has been reviewed by and/or relied on by the experts when coming to our opinions:
 - (a) The relevant parts of the application, in particular the description of the proposal in the Assessment of Environmental Effects and the plans depicting the various stages of the operation;
 - (b) The vivian+espie Landscape and Visual Effects Assessment Report, dated the 24th of June 2024;
 - (c) The vivian+espie Memo Regarding Landscape Issues, dated the 25th of February 2025 (the v+e report);
 - (d) The Mike Moore Peer Review Report, dated the 29th of October 2024;
 - (e) The Mike Moore Memo, dated the 19th of August 2025;
 - (f) The evidence of Ben Espie, dated the 18th of November 2025;
 - (a) The recommended conditions of consent attached to Ms Collie's evidence, dated the 19th of November 2025.

Matters considered at Conferencing - Agenda

- 2. The following matters were discussed at conferencing:
 - (a) Effects of the proposal on landscape values and visual amenity¹;
 - (b) Effects of the proposal on natural character of waterways;
 - (c) Effects if the possible flax and toe toe planting adjacent to Waikaka Road is not undertaken;

¹ We note that since the time of Mr Moore's 19 August 2025 memo, and prior to Mr Espie's evidence, more written approvals have been gained such that no submitters raise the issue of visual amenity effects as experienced from private land.

- (d) Appropriateness of landscape-related conditions put forward by the Applicant (attached to the evidence of Anita Collie).

Matters considered at Conferencing - Outcome

- 3. The outcome of the Conferencing is set out in the attached table at **Appendix 1**.
- 4. In summary we are agreed on all matters and recommend that some additional wording is added into consent conditions to ensure appropriate and effective riparian vegetation eventuates.

Confirmed 27 November 2025

Expert's Name	Party	Signature
Mike Moore	Gore District Council	
Ben Espie	Applicant	

Appendix 1 – Conferencing Outcomes

	Matters of Agreement	Matters of disagreement	Comment / action
Effects of the proposal on landscape values and visual amenity	Following the receipt of additional written approvals, we are in agreement with the assessment of effects on landscape values and visual amenity as expressed in the v+e report and summaries in Mr Espie's evidence. Adverse effects will be of a low-moderate degree at most.	None	None
Effects of the proposal on natural character of waterways	We agree that stream rehabilitation represents an opportunity for long term natural character and biodiversity enhancement. We understand a draft riparian rehabilitation plan has been prepared but to date, we have not seen this. We agree that it is important that this plan includes planting of a significant component of locally appropriate indigenous species.	None	None
Waikaka Road mitigation planting	In the event that flax / toe toe planting is not undertaken adjacent to Waikaka Road (whether inside or outside the site boundary), we agree that this is less preferable; i.e. we agree that it is worth having the proposed screen planting whether on the property or the road reserve. We are in agreement with paragraph 13 of Mr Espie's evidence regarding the situation if the planting cannot be included.	None	None
Conditions	With reference to the draft riparian rehabilitation plan mentioned above, we acknowledge Ms Collie's recommended conditions 34 to 39 as useful but we also agree that additions should be made to these conditions to the effect that details of riparian planting are submitted to the consent authority for assessment and approval to ensure that a net gain (or at least no net loss) of ecological value is achieved. Details should include planting locations, plant species mixes, planting densities or numbers, and plant grades. They should also include establishment and management actions that will be undertaken to ensure the natural character enhancement objectives will be successfully achieved.	None	None

