

## COMMENTS IN SUPPORT FOR THE BENDIGO-OPHIR GOLD PROJECT

This document contains the key comments in support from the following parties:

- > Minister for Infrastructure;
- > Minister for Economic Growth;
- > Minister for the South Island and Associate Minister for Transport;
- > Minister for Resources;
- > Central Otago District Council
- > New Zealand Minerals Council;
- > Santana Mine Supporters Group;
- > Ardgour Family Trust;
- > Shine Irrigation Company;
- > Queenstown Business Chamber of Commerce;
- > John Charles Perriam; and
- > Peter Rough.

### Comments from the Minister for Infrastructure

Comment Number	Comment	Where Addressed in the Application Documents	Response
1	Infrastructure is important for growth and prosperity. Our view is our planning system has not been enabling growth, hence the establishment of the FTAA. I wish to take this opportunity to express my broad support for projects which deliver positive outcomes for New Zealand, including the Bendigo-Ophir Gold Project. Please take this letter of support as a reflection of the Government's economic growth and infrastructure priorities.	<p><b>Substantive FTA Application:</b></p> <p>Section 1, 2 and 6 of the Substantive Application Report</p> <p>B.01 - Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025).</p> <p><b>Response Evidence:</b></p> <p>N/A</p>	<p>MGL agrees and supports the comments made by the Minister of Infrastructure. In particular, the BOGP will:</p> <ul style="list-style-type: none"> <li>&gt; Generate a significant contribution to the GDP of Inland Otago and New Zealand;</li> <li>&gt; Generate substantial revenue for the New Zealand Government; and</li> <li>&gt; Generate substantial foreign investment, making it one of the largest funded projects in New Zealand's infrastructure pipeline.</li> </ul>

### Comments from the Minister for Economic Growth

Comment Number	Comment	Where Addressed in the Application Documents	Response
1	The Minister notes the project is expected to deliver substantial economic benefits, including an average of \$360 million in GDP per year and significant job creation over its 14-year life. The Minister highlights that the mine would bring major capital investment, high-value employment, and strong indirect economic impacts regionally and nationally.	<p><b>Substantive FTA Application:</b></p> <p>Section 1, 2 and 6 of the Substantive Application Report</p> <p>B.01 - Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025).</p>	<p>MGL agrees and supports the comments made by the Minister of Economic Growth. In particular, the BOGP will:</p> <ul style="list-style-type: none"> <li>&gt; Generate a significant contribution to the GDP of Inland Otago and New Zealand;</li> <li>&gt; Generate substantial revenue for the New Zealand Government;</li> <li>&gt; Generate substantial foreign investment, making it one of the largest funded projects in New Zealand's infrastructure pipeline;</li> <li>&gt; Support a wide range of highly paid jobs, bringing with them job security, sustained livelihoods, reduced local unemployment, increased business activity, and indirect employment opportunities; and</li> <li>&gt; Deliver significant contributions to the regional economy.</li> </ul>
2	Another substantial economic benefit of this proposal is its potential contribution to exports, which aligns with the Government's current economic growth plans of doubling exports by 2040.	<p><b>Substantive FTA Application:</b></p> <p>Section 1 of the Substantive Application Report</p> <p>B.01 - Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025).</p>	<p>MGL agrees and supports the comments made by the Minister of Economic Growth. In particular, the BOGP will make an important contribution to meeting the New Zealand Government's goal of doubling the value of New Zealand's mineral exports to \$3 billion by 2035 (A Mineral Strategy for New Zealand, MBIE, January 2025).</p>

### Comments from the Minister for the South Island and Associate Minister for Transport

Comment Number	Comment	Where Addressed in the Application Documents	Response
1	Given the scale of projected economic benefits, including job creation and regional investment the project should deliver significant regional economic benefit.	<p><b>Substantive FTA Application:</b></p> <p>Section 1, 2 and 6 of the Substantive Application Report</p> <p>B.01 - Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025).</p>	<p>MGL agrees and supports the comments made by the Minister for Transport. In particular, the BOGP will deliver significant contributions to the regional economy.</p>
2	The operational impacts of the project on the local transport network have not been assessed. However, it is noted that the applicant has worked closely with the New Zealand Transport Agency during the development of the substantive application, and it is encouraged that this engagement continues, as NZTA is well placed to advise on operational impacts and their management.	<p><b>Substantive FTA Application:</b></p> <p>Section 5 of the Substantive Application Report</p> <p>B.30 - Stantec Integrated Transport Assessment (Stantec 2025)</p>	<p>MGL agrees and supports the comments made by the Minister for Transport and MGL will continue to engage with NZTA Waka Kotahi to ensure planned upgrades meet their safety requirements.</p>

### Comments from the Minister for Resources

Comment Number	Comment	Where Addressed in the Application Documents	Response
1	The project would support the Government’s Minerals Strategy for New Zealand to 2040 through the development of a large-scale, long-life gold operation using modern technology. Gold is included on New Zealand’s Critical Minerals List and gold mining remains one of New Zealand’s most established and internationally competitive mineral activities, with a strong export focus and a demonstrated ability to attract international capital investment.	<b>Substantive FTA Application:</b> Section 1 of the Substantive Application Report	MGL agrees and supports the comments made by the Minister for Resources. The importance of the BOGP is enhanced because gold is now nominated and recognised as a critical mineral and the New Zealand Government is committed to exploring strategic pathways and wider system settings to support the development and supply of critical minerals that can be produced in New Zealand (A Critical Minerals List for New Zealand, Ministry of Business, Innovation & Employment (“ <b>MBIE</b> ”), January 2025).
2	MGL’s economic impact report projects total revenue of approximately \$6.75 billion over the life of the project. Given that almost all gold produced in New Zealand is exported, and subject to delivery of the applicant’s projections, the Project could make a nationally significant contribution to export receipts and materially support progress toward the Minerals Strategy’s export growth target.	<b>Substantive FTA Application:</b> Section 1 of the Substantive Application Report B.01 - Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project (Benje Patterson 2025).	MGL agrees and supports the comments made by the Minister of Resources. In particular, the BOGP will make an important contribution to meeting the New Zealand Government’s goal of doubling the value of New Zealand’s mineral exports to \$3 billion by 2035 (A Mineral Strategy for New Zealand, MBIE, January 2025).

### Comments from Central Otago District Council

Comment Number	Comment	Where Addressed in the Application Documents	Response
1	<u>Government Revenue</u> The project is projected to generate significant crown royalties and corporate taxes, though these are sensitive to fluctuations in gold prices.	<b>Substantive FTA Application:</b> B.01 Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project	MGL agrees.
2	<u>Local Business Support</u> Procurement of goods and services for the project is expected to stimulate demand for local businesses, potentially improving efficiency and productivity	<b>Substantive FTA Application:</b> B.01 Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project	MGL agrees.
3	<u>Infrastructure Catalyst</u> The project may accelerate planned electricity network investments, enhancing regional distribution resilience.	N/A	MGL agrees.

## Comments from New Zealand Minerals Council

Comment Number	Comment	Where Addressed in the Application Documents	Response
1	The Bendigo-Ophir project is managed by experienced, qualified and well-credentialed experts in all aspects of gold mining. While this is an impressive project with a great contribution to make to country, it is not unprecedented.	N/A	MGL agrees and supports the comments made by New Zealand Minerals Council.
2	<p>Mining in New Zealand contributes \$2.07 billion to the Gross Domestic Product (GDP).</p> <p>Mining is 26.6% of the Waitaki District's GDP.</p> <p>Mining is one of the most productive sectors of the New Zealand economy. \$458,952 is the value of what is produced per full time equivalent worker, compared with \$174,045 across the whole economy.</p> <p>Santana Minerals reports that each job at its mine is expected to generate about \$1 million in GDP annually.</p>	<p><b>Substantive FTA Application:</b></p> <p>B.01 Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project</p> <p><b>Response Evidence:</b></p> <p>Evidence of Benje Patterson</p>	<p>More recent estimates from Infometrics for 2025 put the estimate of New Zealand's Mining GDP at \$3.17 billion (source: Infometrics Economic Profile).</p>
3	<p>Mining companies make a number of payments to the Government including royalties. In 2025, \$19.6 million was paid in royalties.</p> <p>The royalties are paid into the New Zealand Consolidated Fund for general Government spending.</p>	<p><b>Substantive FTA Application:</b></p> <p>B.01 Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project</p> <p><b>Response Evidence:</b></p> <p>Evidence of Benje Patterson</p>	<p>Total government revenue (including corporate taxes, royalties, PAYE) in the BPL report was estimated to be \$1.8 billion at a gold price of USD3,138. Under a high scenario for the gold price introduced in paragraph 49 (USD4,707), it is estimated that total government revenue would rise to \$3.0 billion, while under the low scenario for the gold price (USD2,220) total government revenue would fall to \$1.1 billion.</p> <p>The total government revenue estimates can be discounted used the Treasury's 8% real discount rate which gives \$966 million in NPV terms under the scenario in the BPL report, rising to an NPV of \$1.6 billion in the high gold price scenario and falling to \$651 million under the low gold price scenario.</p> <p>Further evidence of how government revenue rises under current gold prices is emphasised by recent evidence from OceanaGold, who paid almost \$200 million to the New Zealand Government in corporate tax and royalties within a single year in 2025 alone.</p>
4	Santana Minerals has estimated \$1.8 billion going back to New Zealanders through the Government over the life of the Bendigo-Ophir Gold Project including royalties at approximately \$450 million; corporate tax at approximately \$1.1 billion; and income taxes including PAYE and ACC at approximately \$216 million. They say more than 60 percent of the gross profits will stay in New Zealand through dividends to New Zealand shareholders, taxes, and royalties.	<p><b>Substantive FTA Application:</b></p> <p>B.01 Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project</p> <p><b>Response Evidence:</b></p> <p>Evidence of Benje Patterson</p>	<p>See above regarding scale of government revenue under different gold prices, and OceanaGold 2025 corporate tax + royalty example.</p> <p>Regarding what stays in New Zealand from an economics perspective – GNP can help show the share of GDP that accrues to New Zealand residents as it adjusts GDP based on where shareholders and workers live. Benje Patterson's evidence shows that GNP is estimated to average \$230 million a year under the \$360 million a year GDP estimate in the BPL report.</p>
5	Getting from prospecting to mining is a long and expensive process. Mining in New Zealand is an attractive investment because we have relatively stable government and rules, regulations, and laws that provide suitable safeguards.	N/A	MGL agree - progressing from prospecting to mining involves significant time, cost, and technical risk. New Zealand's stable regulatory and governance framework provides certainty and appropriate safeguards, making it an attractive destination for mining investment. However, the scale of capital required for large-scale mining typically exceeds domestic investment capacity, meaning overseas investors are often necessary to enable project development.



Comment Number	Comment	Where Addressed in the Application Documents	Response
	The level of capital required does not sit in New Zealand which is why most large-scale mines have overseas investors/owners.		
6	<p>Santana Minerals' total spend in New Zealand since incorporation has been more than \$60 million, \$23.6 million in the past 12 months. The company reports it has 33 full-time staff already working out of Cromwell, with another 30 contractors.</p> <p>Santana Minerals expects that more than 60 percent of its gross profits will stay in New Zealand through dividends to New Zealand shareholders, taxes, and royalties.</p>	<p><b>Substantive FTA Application:</b></p> <p>B.01 Benje Patterson (People and Places)- Economic Impacts of the Bendigo-Ophir Gold Project</p> <p><b>Response Evidence:</b></p> <p>Evidence of Benje Patterson</p>	As at 31 March 2026, 39.1% of SMI's shares were New Zealand owned according to data provided by MGL.
7	<p>Negative perceptions about mining's environmental impacts are often based on mining's past, or mining in jurisdictions where there is little oversight of working and environmental conditions and are not supported by evidence.</p> <p>Environmental impacts from mining have reduced with the use of continually improving science and technology.</p>	N/A	MGL agree - Public perceptions of mining's environmental impacts are often influenced by historical practices or mining activities in jurisdictions with limited regulatory oversight. In well-regulated jurisdictions such as New Zealand, environmental impacts have been substantially reduced through continually improving science, technology, and regulatory controls.
8	<p>Santana Minerals began engaging with the community about the Bendigo-Ophir project in June 2024. Since then, the company has (as of March 2026, and ongoing activities):</p> <ul style="list-style-type: none"> <li>&gt; Held more than 70 community drop-in sessions</li> <li>&gt; Given more than 50 presentations to community and business groups.</li> <li>&gt; Interacted regularly with the closest affected residents, supported by a dedicated project manager.</li> <li>&gt; Established a Community Liaison Group (September 2025) with quarterly meetings.</li> <li>&gt; Attended regional events since September 2024</li> <li>&gt; Since October 2023, community updates on Radio Central, starting monthly and moving to weekly in August 2025.</li> <li>&gt; Launched the Santana Minerals Facebook page in October 2025 for community updates (5,200 followers).</li> <li>&gt; Engaged with mainstream media.</li> </ul>	<p><b>Substantive FTA Application:</b></p> <p>F.16 Bendigo-Ophir Gold Project Pre Application Engagement Report</p> <p><b>Response Evidence:</b></p> <p>Evidence of Benje Patterson</p>	MGL agrees and supports the comments made by New Zealand Minerals Council.
9	Since 2024, Santana has invested \$84,500 in communities across the region. It is important to note that at this stage, the business is only spending money, not making money.	N/A	MGL agrees and supports the comments made by New Zealand Minerals Council.

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	The company has a formal sponsorship and donation programme, with criteria, that runs throughout the life of the mine.		
10	The fast-track law is ideal for the large-scale, complex nature of mining projects which span rules, regulations and laws across central and local government jurisdictions. It provides a one stop shop without bypassing the environment.	N/A	MGL agrees and supports the comments made by New Zealand Minerals Council.

### Comments from Santana Mine Supporters Group

Comment Number	Comment	Where Addressed in the Application Documents	Response
1	Over 99% of survey respondents assessed the likely economic and employment impact as positive.	N/A	Not covered in response evidence.  This is a positive number, but was not referenced in Benje Patterson's evidence as there are risks it could be biased relative to what the rest of the population in the local area think, and so it would be better to have such surveys done in a more representative way.
2	Survey respondents also identified broader economic benefits including increased household incomes, economic diversification and improved long-term resilience for Central Otago communities.	<b>Response Evidence:</b> Evidence of Benje Patterson	The increase to mining from the BOGP would establish scale in a new high-value adding industry, which could support resilience through economic diversification away from existing industry. The benefits of the economy diversification from the Project into a new high-value industry was identified by both CODC and the Queenstown Business Chamber of Commerce.
3	The project is estimated to generate more than \$2 billion in tax and royalty revenue over its life. Independent economic analysis estimates annual GDP contributions of approximately \$360 million, with total economic impact around \$5.8 billion over the life of the project	<b>Substantive FTA Application:</b> F.16 Bendigo-Ophir Gold Project Pre Application Engagement Report  <b>Response Evidence:</b> Evidence of Benje Patterson	Covered extensively in Benje Patterson evidence.  Note that the cumulative economic impact of \$5.8 billion was not originally discounted in the BPL report. If it is discounted to use the Treasury's 8% discount rate then it equates to \$3.1 billion.
4	Gold mining projects often evolve over time as exploration continues. Where geology supports it, additional resource discovery can expand both the scale and duration of economic benefits.	N/A	Not covered as focus was only on the duration of the mine as per the PFS.  The experience of other mines such as Waihi and Macraes has been that operational lifespans expand as new discoveries are made.  The PFS assumptions regarding recoverable gold reserves are likely to be conservative relative to what happens in practice.

Comment Number	Comment	Where Addressed in the Application Documents	Response
5	Expected to create approximately 350 direct jobs with additional indirect and induced employment increasing total employment impacts to over 800 jobs. Average salaries are expected to be materially higher than current regional levels (\$140k p.a)	<p><b>Substantive FTA Application:</b></p> <p>F.16 Bendigo-Ophir Gold Project Pre Application Engagement Report</p> <p><b>Response Evidence:</b></p> <p>Evidence of Benje Patterson</p>	<p>It is best to focus on the 351 direct jobs, at the \$140,000 average salary which is twice the current average in the region.</p> <p>Multiplier employment effects should not be focussed on when quoting headline numbers. Economic experts unanimously said there is uncertainty regarding multiplier effects, and it was recommended to the Panel that the primary focus should be on direct employment and economic activity.</p> <p>People acknowledge that indirect and induced effects exist, but it is very uncertain and contentious as to exactly how they should be estimated.</p>
6	Project is seen as supporting the retention and return of skilled workers.	<p><b>Substantive FTA Application:</b></p> <p>F.16 Bendigo-Ophir Gold Project Pre Application Engagement Report</p> <p><b>Response Evidence:</b></p> <p>Evidence of Benje Patterson</p>	<p>It is acknowledged that workers moving into BOGP roles will have a mix of skills. This means that, while some workers will come out of average wage roles, there will be others coming from higher skilled industries. A survey undertaken by MGL reported that 27% of potential employees will be new to construction and mining, while the rest have experience across related skills. As such, other points of wage comparison may also be helpful to the Panel. Statistics New Zealand's Monthly Employment Indicators drawn from payroll tax filings to December 2025 can give a recent indication of average wages by industry in Inland Otago. Analysis of the data shows that industries which are likely to require workers matched to having technical and higher skills required by the mine, such as construction and professional, scientific, and technical services offer average earnings of \$88,500 and \$102,300 a year respectively in Inland Otago. The average earnings of BOGP workers would be 59% and 37% respectively higher than these benchmarks</p>
7	Project has the potential to support population stability, school enrolments and local services.	N/A	MGL agrees and supports the comments made by Santana Mine Supporters Group.
8	Environmental protection, water management, tailings storage, and long-term rehabilitation are identified as key areas of concern in survey responses.	N/A	MGL agrees and supports the comments made by Santana Mine Supporters Group.
9	Santana has made a substantial and sustained effort to inform the public and provide opportunities for engagement.	N/A	MGL agrees and supports the comments made by Santana Mine Supporters Group.
10	The evidence indicates that the project is consistent with the purpose of the Act, which is to enable projects that deliver significant benefits while ensuring that environmental effects are appropriately managed.	N/A	MGL agrees and supports the comments made by Santana Mine Supporters Group.

### Comments from Ardgour Family Trust

Comment Number	Comment	Where Addressed in the Application Documents	Response
1	It gives the community an opportunity of some real wealth being generated that some of our existing high employer industries do not provide. Tourism, viticulture and horticulture provide some wealth for a very few but are predominantly minimum wage payers and very seasonal, so no stability of work force or really part of the community. Mine will provide higher wages and support local businesses.	N/A	MGL agrees and supports the comments made by Ardgour Family Trust.

### Comments from Shine Irrigation Company Limited

Comment Number	Comment	Where Addressed in the Application Documents	Response
1	Supports the project, noting no expected adverse effects on their irrigation scheme, and no concerns about noise, air quality, or landscape impacts given existing agricultural activity and prevailing winds	N/A	MGL agrees and supports the comments made by Shine Irrigation Company Limited.
2	Supports increase in workers to the region noting the children of mine workers could be employed in local seasonal work.	N/A	MGL agrees and supports the comments made by Shine Irrigation Company Limited.

### Comments from Queenstown Business Chamber of Commerce

Comment Number	Comment	Where Addressed in the Application Documents	Response
1	The Chamber accepts that the project constitutes a major contribution to the Central Otago economy	N/A	MGL agrees and supports the comments made by the Queenstown Business Chamber of Commerce.

**Comments from John Charles Perriam**

Comment Number	Comment	Where Addressed in the Application Documents	Response
1	Supports the proposed Bendigo-Ophir gold mine and considers allowing it to proceed under modern regulatory conditions to be the right decision for Bendigo, the region, and New Zealand.	N/A	MGL acknowledges this comment by John Charles Perriam.
2	He considers the land proposed for mining to be the least productive part of Bendigo Station, with low fertility and long-term degradation.	N/A	MGL acknowledges this comment by John Charles Perriam.
3	He is comfortable with modern mining practices and has reviewed and signed off on the rehabilitation plan, believing the land can be successfully restored after mining.	N/A	MGL acknowledges this comment by John Charles Perriam.
4	He describes Santana Minerals as honest, transparent, and trustworthy, and states he has no concerns about farming and living next to a mine operated by the company.	N/A	MGL acknowledges this comment by John Charles Perriam.
5	He notes that Santana Minerals is already employing local people, investing millions of dollars in the local economy, and supporting community and charitable initiatives.	N/A	MGL acknowledges this comment by John Charles Perriam.
6	He considers Bendigo's water resources to be abundant and well understood and is confident that water capture, recycling, and treatment can be managed safely during mining.	N/A	MGL acknowledges this comment by John Charles Perriam.
7	He notes that naturally occurring trace minerals already exist in local water supplies and that there have been no adverse effects on people or livestock over generations.	N/A	MGL acknowledges this comment by John Charles Perriam.
8	He describes the mine as an extraordinary economic opportunity that would deliver significant benefits to the Otago and New Zealand economy, including infrastructure and public services.	N/A	MGL acknowledges this comment by John Charles Perriam.
6	He believes the mine has the potential to revitalise the declining Tarras community by bringing employment, people, and investment back to the area.	N/A	MGL acknowledges this comment by John Charles Perriam.
7	While acknowledging the difficulty of the decision, he believes selling the land for mining is justified when balanced against wider community benefits.	N/A	MGL acknowledges this comment by John Charles Perriam.
8	He supports the rehabilitation of the site after mining and its return to the public as a park, continuing Bendigo's long history of land-use change and public access.	N/A	MGL acknowledges this comment by John Charles Perriam.

**Comments by Peter Rough**

Comment Number	Comment	Where Addressed in the Application Documents	Response
1	Mr Rough agrees that the application accurately describes the landscape context, landforms, and land cover of the project area.	<b>Substantive FTA Application:</b> B.19 Boffa Miskell - Landscape, Natural Character and Visual Effects Assessment (Boffa Miskell 2025) (2 Parts)	MGL notes that Mr Rough concurs with key aspects of the application’s description of the existing landscape context, including the project setting, topography, and land cover as outlined in the Landscape, Natural Character and Visual Effects Assessment. This agreement confirms that the baseline understanding of the receiving environment presented in the application is accurate and appropriately described.
2	The expert acknowledges that the applicant’s landscape assessment adopts recognised and current professional assessment methods.	<b>Substantive FTA Application:</b> B.19 Boffa Miskell - Landscape, Natural Character and Visual Effects Assessment (Boffa Miskell 2025) (2 Parts)	MGL notes that Mr Rough acknowledges that the landscape assessment undertaken for the project follows current professional practice, including the use of physical, perceptual, and associative dimensions to describe and evaluate landscape character and values. This confirms that the methodology applied in the assessment is consistent with accepted professional standards.
3	Mr Rough acknowledges that the applicant’s visual simulations are an appropriate tool for assessing visual effects.	<b>Substantive FTA Application:</b> B.19 Boffa Miskell - Landscape, Natural Character and Visual Effects Assessment (Boffa Miskell 2025) (2 Parts)	MGL notes that Mr Rough accepts that visual simulations are an appropriate and useful tool to assist in understanding potential visual change arising from a proposal. Visual simulations have therefore been appropriately used in the application to inform the assessment of visual effects from representative public viewpoints.
4	The submission acknowledges that the proposal includes mitigation measures, progressive rehabilitation, and post-closure landscape treatment intended to reduce effects over time.	<b>Substantive FTA Application:</b> B.19 Boffa Miskell - Landscape, Natural Character and Visual Effects Assessment (Boffa Miskell 2025) (2 Parts)	MGL acknowledges Mr Rough’s recognition that the proposal includes a range of mitigation measures, including dust, noise, and lighting management, as well as progressive rehabilitation and post-closure landscape treatment. As identified in the assessment, these measures are intended to reduce effects over time, including following mine closure.
5	Mr Rough acknowledges that the proposed backfilling of the Come in Time Pit demonstrates that landform integration is achievable in practice.	<b>Substantive FTA Application:</b> B.19 Boffa Miskell - Landscape, Natural Character and Visual Effects Assessment (Boffa Miskell 2025) (2 Parts)	MGL notes Mr Rough’s acknowledgment that the proposed backfilling and recontouring of the Come in Time Pit demonstrates that backfilling is feasible and capable of achieving a landform that integrates with the surrounding terrain in certain locations. This supports the application’s position that landform treatment and integration can be successfully achieved where applied.