SUBMISSION OF PETER ROUGH

To the Expert Panel considering Matakanui Gold Limited's application for the Bendigo-Ophir Gold Project under the Fast-track Approvals Act 2024

PART 1: PERSONAL SUBMISSION

Introduction

1 On 11 March 2026, my wife (Cheryl Lilian Lucas) and I received an invitation from Fast-track at the New Zealand Government to comment on the application for the Bendigo-Ophir Gold Project.

Land ownership and connection to Bendigo

2 My wife and I reside in Lyttelton but own a 3.4779 ha property legally described as [redacted] located on Bendigo Loop Road at its junction with Blue Mines Road. We acquired the land in 1997. It was formerly part of Bendigo Station and was kept in my wife's family after her parents sold the station in 1979 having owned it for 33 years.

3 Our property is a generally flat rectangular block and for a period in the 1860s, it formed part of the former Town of Bendigo. A plan for the township in our possession shows our property subdivided into 31 small lots, and we understand that remnants of a small stone building on the property was a hotel during the township period.

4 The property is now well fenced and includes a vehicle track leading to an installation of managed beehives. It is not grazed and contains one very large and several smaller pine trees, areas of pasture grasses and rosehip briar, as well as remnant plantings from its township days, including a grapevine, fruit trees, roses, and rosemary bushes. With considerable difficulty we have established some small stands of kānuka propagated by my wife from locally collected seed.

5 We have considered constructing a dwelling on the property. Although concept drawings have been prepared by an architect, the Canterbury Earthquake Sequence disrupted our plans. Whether or not we build our intention is to retain the property for the future benefit of our daughter and granddaughter.

Wider familiarity with the Ardgour and Bendigo areas

6 I have been visiting the Bendigo area since 1973 and have developed considerable familiarity with both Bendigo Station and the wider landscape.

7 This has included accompanying my father-in-law in farm vehicles over parts of the station, making numerous trips on Ardgour Road between Tarras and Lindis Crossing, travelling on Thomsons Gorge Road from Ardgour Valley over Thomsons Saddle to the Manuherikia Valley, visiting Welshtown on numerous occasions, and often walking tracks within the Bendigo Reserve.

8 Since 1980, I have stayed regularly in a farm dwelling on a 24-hectare property located between State Highway 8 and the Clutha River, extending approximately 1.8 kilometres northwards from a point opposite the Bendigo Station homestead. This property has remained in my wife's family ownership since the sale of the station in 1979.

Proximity to the project

9 While most of our property lies within Mineral Prospecting Permit No. 60311 (near the permit area's north-western corner), the principal components of the proposed project, in the Shepherd and Rise and Shine stream valleys, are located approximately 4.5–9.5 km from the closest boundary of our land. Due to intervening landforms, these features will not be visible from our property. Notwithstanding this, I have significant concerns

regarding the broader effects of the mining proposal on the Ardgour and Bendigo landscapes.

Personal perspective and concerns

10 From a personal perspective, I oppose the proposed Bendigo-Ophir Gold Project.

11 Over many years, I have come to value the Ardgour and Bendigo landscapes for their distinctive Central Otago character. In particular I appreciate their openness, the clarity and coherence of their landforms, and the sense of naturalness and relative remoteness they provide. I also value the historic remnants of earlier gold mining activity, which are generally small-scale and integrated into the landscape, contributing to its character rather than dominating it.

12 My principal concern is that the scale and nature of the proposed development would introduce a level of landscape modification that is inconsistent with these qualities. I am also concerned that some of the effects of the proposal, especially arising from open pits, engineered landforms, and the tailings storage facility, will be enduring. And I am concerned that approval may set a precedent for further large-scale mining in the Ardgour/Bendigo area.

13 For these reasons, I oppose the proposal from a personal perspective, based on my long familiarity with and appreciation of the Ardgour/Bendigo area and concern for the protection of its landscape.

TRANSITION TO EXPERT SUBMISSION

14 The following section is provided in my capacity as a landscape architect with considerable experience in undertaking landscape assessments for a wide range of projects throughout New Zealand and in Victoria, Australia.

PART 2: EXPERT LANDSCAPE SUBMISSION

Introduction

1 My full name is Peter Rough.

2 I hold diplomas in Horticulture and Landscape Architecture obtained in 1969 and 1974 respectively from Lincoln College (now Lincoln University). I am a Life Member of the New Zealand Institute of Landscape Architects Inc.

3 I am a semi-retired landscape architect and a consultant at Rough Milne Mitchell Limited (**RMM**). I was a director of the company from its inception in 2010 until April 2016. Prior to that, from 1982, I was director of Peter Rough Landscape Architects Limited. And over the 1974-1981 period I held positions at the Lands & Survey Department in Auckland, George Wimpey Limited in London, and Lincoln University.

4 While I have considerable experience in landscape design, site planning, and master planning, over the last 30 years I have concentrated on undertaking landscape and visual assessments on a wide range of projects including communication, marine farm, wind farm, hydro-electric power, subdivision, mine, and quarry projects.

5 I have prepared and presented evidence as an expert witness at council hearings and before the Environment Court, Boards of Inquiry, and Special Tribunals in New Zealand, and the Victorian Civil and Administration Tribunal in Australia. I have peer reviewed other landscape architects' landscape and visual assessment work on a range of projects including Trans-Tasman Resources' seabed mining proposal in the South Taranaki Bight, and Oceana Gold's activities at its Reefton and Macraes operations.

6 While the application for the Bendigo-Ophir Gold Project (**BOGP**) may not proceed with a hearing, I confirm that my Expert Landscape Submission has been prepared in accordance with the Environment Court's Code of Conduct for Expert Witnesses as specified in the Environment Court's Practice Note 2014. This submission is within my area of expertise except where I state that I rely upon the work of other experts. I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed.

7 I have relied on the following application documents in the preparation of this submission:

a) A.02B Legal Review on behalf of Matakanui Gold Limited 31 October 2025 (Lane Neave)

b) A.09A Section 2 Existing Environment

c) A.10 Section 3 Project Description

d) A.13 Section 6 Assessment of Environmental Effects

e) B.19 Boffa Miskell Landscape, Natural Character and Visual Effects Assessment (Boffa Miskell 2025) Parts 1 & 2 (**BML Assessment**).

f) B.19A Boffa Miskell Landscape Graphic Supplement

g) B.19B Boffa Miskell Landscape Visual Simulations, Parts 1-4.

h) B.31 Cosgroves Limited Exterior Lighting Report (Cosgroves 20250

i) B.39 Rob Greenway & Associates Recreation Assessment (Greenaway 2025)

j) G.07A Landscape & Ecological Rehabilitation Management Plan.

k) G.07B Landscape & Ecological Rehabilitation Management Plan Appendices.

8 In relation to this submission, I undertook a site visit on the evening of 9 March and during the day of 10 March. As set out in my personal submission, I am quite familiar with the Ardgour and Bendigo landscapes from numerous visits to the area since 1973. And in a professional capacity I have, over a 40-year period, acquired a broad appreciation of Central Otago having been involved in many design projects, and having undertaken numerous landscape assessments and taken part in many council and Environment Court hearings concerning projects within the district, including in Wanaka and Queenstown and their environs, on terraces with ONL status in the vicinity of Lowburn, and on the more Lammermoor Range.

9 Most of the Site is located within the Dunstan Mountains Outstanding Natural Landscape (**ONL**), triggering consideration of RMA s6(b). The Site includes several streams, wetlands, and associated tributaries and springs, which require consideration under RMA s7(c). My submission focuses on what I regard as enduring adverse effects on the Dunstan Mountains ONL.

10 My submission is structured as follows:

a) Landscape context

b) Statutory planning context

c) Landscape and visual effects

d) Landscape and visual effects during the construction and operational stages of the BOGP

e) Enduring (post-closure) landscape and visual effects

f) Conclusions

Landscape context

12 Section 3.0 of the BML Assessment addresses the project setting, topography, and land cover and, in general, I concur with the descriptions given under these headings.

13 Landscape character is addressed with reference to two studies. One, undertaken by LA4 in 2007, is the 'Central Otago District Rural Review Landscape Assessment', which has a focus on landscape sensitivity. The BML Assessment notes that in the LA4 study the Dunstan Mountains, along with the Pisa Range, are described as being located within Landscape Unit 5, which is one of ten units located in the 'Main Ranges' landscape character category. Of some significance to the BOGP is that the Pisa and Dunstan mountains were assessed as ONLs with "extreme sensitivity to development", including new farming regimes, forestry, new tracks and roads, wilding pines, and rural residential subdivision. Although open cast mining is not listed, in my opinion it is an activity to which the Dunstan Mountains, as ONL, would be extremely sensitive to.

14 The second study referred to in the BML Assessment that concerns landscape character is 'Bendigo-Ophir Gold Project, Assessment of Dunstan Mountains Outstanding Natural Landscape,' undertaken by Boffa Miskell Limited (**BML**) in May 2026. This study follows current professional practice, which conceptualises landscape as three overlapping dimensions, namely: physical, perceptual, and associative, through which landscape character can be described and landscape values can be identified and assessed.

15 BML's summary of relevant landscape values in relation to the Dunstan Mountains ONL, as identified in their 2024 study, is set out in section 3.4.2 of the BML Assessment. In her Landscape Review of the BOGP, Landscape Architect Bridget Gilbert, with reference to BML's summary of relevant landscape values, considers *that a number of amendments are necessary to accurately reflect the existing landscape values that make the Dunstan Mountains area outstanding*. Having perused Ms Gilbert's comprehensive 'Dunstan Mountains ONL: Schedule of Landscape Values', which is presented in her Landscape Review, I concur with its content and prefer it to BML's summary that is set out in section 3.4.2 of their assessment.

16 In section 3.5 (Summary of Context and Character') of the BML Assessment, two statements, with which I agree, are, in my opinion, of significance regarding the Dunstan Mountains ONL. These are:

* *The broader landscape, including the skyline, remains distinctive and coherent and predominantly void of obvious built form and modification.*

* *The Dunstan Mountains retain a high sense of naturalness albeit entrenched in human influence over several centuries.*

17 Two adjacent streams catchments within the Dunstan Mountains, namely those of associated with the Rise and Shine and Shepherds creeks, are where the project Site is predominantly located. The general character of these two catchments is well-illustrated in the BML Assessment Site Appraisal photographs on pages 12-20 in the assessments' Graphic Supplement and is described in section 3.6 of the assessment.

18 A series of Site Context photographs on pages 21-27 in the Graphic Supplement, with text in section 3.7 of the BML Assessment, assists in identifying the project Site's potential viewing audience within the Upper Clutha Basin. I concur with the selection of viewpoints and consider that, collectively, they convey the Site's relevant Broadscale Landscape, which by my reckoning encompasses approximately the south-western half of northwest-facing slopes of the Dunstan Mountains.

Statutory planning context

19 As I noted at paragraph 9 above, this submission focuses on what I regard as enduring adverse effects on the Dunstan Mountains ONL. Several documents have content that is potentially relevant to this matter. These include:

Fast Track Approval: Act 2024

As per Schedule 4 matters to be covered in an assessment of environmental effects includes Section 4 (b) *any physical effect on the locality, including landscape and visual effects.*

Resource Management Act 1991

Sections relevant to an assessment of landscape effects include:

> Section 6(a) - the preservation of natural character of ... wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development.
>
> Natural character is generally accepted as being defined as "... an area's distinctive combination of natural characteristics of qualities, including degree of naturalness ..." And, in relation to Section 6(a), within the project area are Shepherds, Jean, Rise and Shine, creeks and their tributaries.
>
> Section 6(b) – the protection of outstanding natural features and landscapes from inappropriate subdivision, use and development.
>
> As previously mentioned, most of the project area lies within the Dunstan Mountains ONL.
>
> Section 7(c) – the maintenance and enhancement of amenity values.
>
> The RMA defines amenity values as "those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes". Such values may be covered as perceptual and associative values in an assessment of an ONL.

National Policy Statement for Freshwater Management, 2020

Policy 6 calls for no further loss of natural inland wetlands, the protection of their values and promotion of their restoration. Policy 7 calls for the loss of river extent and values be avoided to the extent practicable.

(Operative) Otago Regional Policy Statement, 2019

Chapter 3, Part B requires that significant natural resources (including freshwater bodies, natural features and landscapes) are identified, protected, and enhanced where degraded. And Policy 5.4.8, which concerns mineral exploration and processing requires measures that avoid, remedy or mitigate as necessary, adverse effects on identified values.

Proposed Otago Regional Policy Statement, 2021

The Land and Freshwater chapter addresses the requirements of sections 6(a) and 6(b) of the RMA, and regarding the latter requires avoiding exceeding the landscape capacity of the natural feature or landscape.

Central Otago District Plan (**CODP**)

The CODP recognises the whole of the Dunstan Mountains range as an ONL. Regarding this ONL it is my opinion that there are two very pertinent statements in the BML Report. These are:

* *In Section 4.2.2: The CODP recognises the need to protect the unique and distinctive landscape of Central Otago, and outstanding natural landscapes from inappropriate subdivision, use, and development. It also recognises that while those landscapes are constantly evolving through natural processes, the rocky and semi-arid nature of this landscape can be vulnerable to the presence of new structures, cultivation of tussock grasslands, large earthworks, new roads, and establishing woodlots, production forestry or shelterbelts on elevated land.*

* *In Section 4.7: The key matters of relevance to this assessment include the protection of outstanding natural landscapes from inappropriate subdivision, use, and development, maintaining the open natural character of the hills and ranges, and preserving the natural character of the district's water bodies and their margins. This includes avoiding, remedying, and mitigating adverse effects on the landscape, natural character, and amenity values of the rural environment.*

  The key objectives and policies of relevance to this assessment outlined within Section 13 are primarily focused on ensuring the construction and operation of infrastructure, does not compromise landscape, natural character, and amenity values, including within ONLs.

Bendigo Conservation Covenant

This covenant is a legally binding agreement made in August 2020 under the Reserves Act 1977 between Bendigo Station landowners and the Minister of Conservation, covering approximately 1,100 ha. It mandates the protection of biodiversity (kānuka shrubland, herbfield) and historic gold mining heritage on the Dunstan Range

Landscape and visual effects

20 From my perusing description of the BOGP in the applicant's documents, namely:

* A.02B Legal Overview;

* A.10 Section 3 Project Description; and

* B.19 Landscape, Natural Character and Visual Effects Assessment,

it is apparent that the project will consist of physical structures and various activities that will be temporary and have temporary effects, while other features of the project will have enduring (post closure) landscape and visual effects.

21 In the BML Assessment it is stated (section 6.1) that the nature of effects can be summarised as:

> Landscape effects: Changes in a landscape's physical attributes and implications of changes on the landscape's values; and
>
> Visual effects: Relating to the changes that arise in the composition of available views as a result of changes to the landscape values and to the overall effects with respect to visual effects and amenity.

22 After listing the principal elements of the proposal that will give rise to landscape effects (section 6.5), outlining existing characteristics and values of the Dunstan Mountain ONL

and Site landscape values (section 6.5.1), landscape effects within the site are addressed for each of the proposal's principal elements (section 6.5.3). The level and nature of landscape effects arising from the proposal's elements, have been ranked using a seven-point scale, ranging from Very Low to Very High, for three phases of the BOGP, namely:

* Startup (Year 0-3)
* Mining activity (Year 3-11)
* Closure (Year 11-30)

23 After evaluating (in section 5.3) the level and nature of landscape effects arising from 14 elements over three phases of the project the BML Assessment concludes that:

> *Overall effects on the Dunstan Mountains ONL, are considered **moderate adverse** during startup and mining activity. On closure and following rehabilitation effects will reduce to **low-moderate adverse** as mitigation measures associated with each of the project elements and the surrounding landscape begin to establish.*

24 The BML Assessment incorporates ten visual simulations that have been prepared from representative and publicly accessible viewpoints, previously referred to as the subject of Site Context Photographs. In my opinion visual simulations can be a good aid to understanding the proposed visual changes generated by a proposal in a view. The BML Assessment simulations conveniently convey, for each viewpoint, the existing view, a view during operation, and a view at closure of the BOGP.

25 Unfortunately, in all views the sky is mostly obscured by clouds. In my experience an almost complete cover of cloud acts like a giant diffuser, resulting in a much flatter tonal range. Hills and ranges can look flatter and less three-dimensional. And because clouds can hide shadows and reduce contrast, in the BML visual simulations, constructed features such as mine pits and engineered landforms appear less prominent than they would under angled light. In my opinion, because of the presence of clouds, the visual simulations in the BML Assessment underplay the visibility of the mine pits and engineered landforms in comparison to how they would appear when the sky is clear. And clear skies are very common in Central Otago, which features high sunshine hours and some of the clearest, driest, air in New Zealand.

26 As with landscape effects the level and nature of visual effects over the three phases of the BOGP are addressed in the BML Assessment (section 6.6) and it is concluded that

> *Overall visual effects from local roads, and State Highways are considered up to **moderate adverse** during mining activity and would effectively reduce to **low adverse** at closure.*

and

> *Overall visual effects on users of public conservation and recreational areas are considered no greater than **low moderate adverse** during mining activity and reducing to **low adverse** at closure, The greatest visual effect will be experienced by users of the Ardgour/North Dunstan hunting block, with views from other conservation and recreational areas being largely truncated by intervening landform and vegetation.*

Landscape and visual effects during the construction and operational stages of the BOGP

27 I have reviewed the landscape assessment prepared by Boffa Miskell, including section 6.5.3 which evaluates the landscape effects of the project's principal elements across the construction, operational, and rehabilitation phases, and concludes that overall

effects on the Dunstan Mountains Outstanding Natural Landscape would be "moderate adverse" during start-up and mining. In my opinion, while that assessment appropriately identifies individual components and mitigation measures, it does not fully capture the cumulative effect of these components on overall landscape character during the operational phase.

28 In my opinion the construction and operational phases, anticipated to extend over a period of one to two decades, the BOGP would introduce a landscape that is, in character and function distinctly industrial in nature. The establishment of several open pits, the carbon-in-leach processing plant and associated infrastructure in Shepherds Valley, extensive haul roads, stockpiles, and the progressive development of the tailings storage facility and engineered landforms, would collectively transform what is currently a predominantly natural and pastoral environment into one dominated by extractive and processing activities. This would result in extensive areas of exposed substrate, active earthworks, and the continual movement of heavy machinery and haul vehicles.

29 Built elements, plant, and infrastructure, together with periodic blasting, would contribute to a working environment where noise, vibration, and dust are evident features, and where the visual appearance is dominated by excavation faces, spoil, and engineered surfaces rather than natural landforms. This industrial character would be further reinforced by operational lighting, including during low-light and night-time periods, introducing artificial illumination into a rural environment that is, currently, mostly unlit.

30 In my assessment, while mitigation measures such as dust suppression, noise management, and directional lighting are proposed, these do not alter the underlying character of the activity, which remain one of large-scale resource extraction. Rather, they moderate its effects while the landscape remains one of active resource extraction.

31 Although progressive rehabilitation would occur over time, the landscape would present a mosaic of active and partially rehabilitated areas, with the overall impression continuing to be one of an industrial landscape. In this context, the characterisation of effects as "moderate adverse" during the operational phases does not fully reflect the extent to which the project would temporarily establish an industrial landscape within an area identified as an Outstanding Natural Landscape in the Operative Central Otago District Plan, where objectives and policies seek to avoid, remedy, or mitigate adverse effects on landscape values, and to protect the natural character, visual amenity, and coherence of such landscapes.

Enduring (post-closure) landscape and visual effects

32 Following closure, while buildings, plant, and other overtly industrial elements would be removed, the resulting landscape would remain permanently modified in ways that are fundamentally different from its existing natural character. The principal landscape issue arising from the BOGP is the enduring nature of landform modification associated with:

- Large open pits
- Engineered landforms
- Engineered platform to accommodate process plant
- A retained and capped tailings storage facility

33 I briefly address these elements as follows:

<u>Large open pits</u>

The application proposes that the Come in Time Pit will be backfilled following extraction, with the intention of achieving a landform that blends with the surrounding

terrain. However, the application does not provide a clear justification for the decision not to backfill the other, largerpits. Given the scale of these excavations, this is a critical omission. If the decision not to backfill is based on economic considerations, then this should be explicitly stated and evaluated in the context of the resulting environmental effects.

In the absence of backfilling, the remaining pits will constitute:

- Large, artificial voids
- Features that are inconsistent with the natural landform patterns of the area
- Permanent elements of the landscape

In my opinion, such features represent significant adverse effects on landscape character.

Engineered landforms (**EFLs**)

I am concerned that the proposed use of ELFs in place of more extensive backfilling of open pits will result in highly artificial and visually prominent landforms that are not appropriately integrated with the existing character of the Shepherds Creek and Rise and Shine valleys.

While the application for the BOGP describes ELFs as "naturalised and based on geomorphic design principles", this appears to reflect engineering objectives – such as slope stability, erosion control, and drainage management – rather than genuine restoration of the pre-existing landform patterns. In particular, the proposal does not demonstrate that ELFs will replicate the scale, form, and coherence of the existing valley systems. Instead, they are likely to remain recognisably artificial features at a macro-landscape scale, notwithstanding any surface irregularity or revegetation.

That the Come in Time Pit will be backfilled and recontoured to integrate with the surrounding terrain indicates that backfilling is both feasible and capable of delivering a more appropriate landscape outcome in certain locations. However, the application does not provide a clear or consistent set of criteria for why this approach is not applied more broadly across the site.

In particular:

- There is no comparative assessment of landscape and visual outcomes between full or partial backfilling and the proposed ELF approach;
- There is no transparent evaluation of the extent to which increased backfilling could reduce adverse landscape effects; and
- The reasons given for not backfilling other pits are framed in terms such as "not practicable" or "not necessary," without clear supporting analysis, and appear to effect operational or economic considerations rather than landscape outcomes.

I consider that this approach gives insufficient weight to the importance of maintaining the natural character and visual coherence of these valley landscapes, as required under the RMA. The Shepherds Creek and Rise and Shine valleys have a distinctive landform pattern that will be fundamentally altered by the introduction of large-scale engineered landforms that do not reflect the underlying geomorphology.

Furthermore, the reliance on revegetation over time to mitigate visual effects is uncertain in the Central Otago environment, where climatic conditions can limit vegetation establishment and growth. Even with successful revegetation the underlying

landform shapes will remain substantially modified and will continue to be perceived as unnatural.

Process-plant platform

The BML Assessment treats the process plant area as a major, long-duration industrial feature. The plant will sit on a large, flat, engineered terrace, involving cut and fill earthworks, for long-term stability for heavy infrastructure. Once processing equipment has been removed and salvaged, or demolished and taken off-site the remaining engineered platform results in a fundamentally altered landform that will persist well beyond the life of mining. While the applicant relies on rehabilitation and revegetation to mitigate effects, this does not equate to restoration of the natural landform or landscape character.

In an Outstanding Natural Landscape, the relevant policy framework requires protection of natural character and generally seeks to avoid, rather than simply remedy or mitigate, adverse effects. The retention of a flattened engineered platform is at odds with these objectives. Furthermore, the acknowledgement that vegetation cover will take decades to establish reinforces that adverse visual and landscape effects will be long-term. The proposal therefore represents a permanent transformation of part of the landscape, contrary to the intent of landscape protection provisions.

Tailings Storage Facility (**TSF**)

For the BOGP, the proposed TSF is one of the key features that will remain permanent after mine closure. It will result in an enduring modification of the natural landform and character of Shepherds Valley, through the introduction of a large, engineered, valley-fill landform that does not currently exist. While rehabilitation and revegetation may reduce visual contrast over time, the resulting landform will remain discernibly artificial in its geometry, surface expression, and origin, and will not replicate the complexity or legibility of the pre-existing natural landscape. When considered alongside the open pits and engineered landforms, the TSF will contribute to a cumulative and enduring transformation of the landscape from a natural Outstanding Natural Landscape to a modified, naturalised landscape. In this context, the proposal does not avoid adverse effects on the key attributes of the ONL, but instead relies on mitigation, which is insufficient to address the permanent loss of natural landform character and integrity.

34 These above-mentioned elements would be anthropogenic in origin and would not replicate the complexity, irregularity, and geomorphic expression of the schist-derived landforms that underpin the identified values of the Dunstan Mountains Outstanding Natural Landscape. From my analysis of the visual simulations at their ten viewpoints, it is my opinion that from the viewpoints the ELF, the WELF, and the RAS pit will have enduring adverse effects as they are essentially incongruous unnatural landforms that will, even after revegetation and/or weathering, endure as discordant elements in the landscape.

35 The ELF will have enduring adverse effects from Viewpoint 10: Mount Pisa Road

The WELF will have enduring adverse effects from Viewpoint 1: Thomsons Gorge Road

The ELF and WELF will have enduring adverse effects from Viewpoint 9: State Highway 8

The WELF and RAS PIT will have enduring adverse effects from Viewpoints 2: Ardgour Road, Lindis Crossing; Viewpoint 3: Maori Point Road; Viewpoint 5: Jolly Road; and Viewpoint 6: State Highway 8A

The ELF, WELF, and RAS pit will have enduring adverse effects from Viewpoint 7: Pukekowhai Drive and Viewpoint 8: State Highway 8

From my analysis it is apparent that the WELF will have the most prevalent enduring adverse effects from publicly accessible viewpoints.

36 The Operative Central Otago District Plan has objectives and policies that seek to maintain the integrity of landform patterns and ensure that development is in harmony with the landscape. Similarly, the Proposed Central Otago District Plan (notably the Natural Environment chapter and the Outstanding Natural Landscapes provisions, including objectives and policies within the Natural Features and Landscapes chapter) adopts a stronger directive framework, seeking to protect ONLs from inappropriate subdivision, use and development, safeguard their biophysical landscape values, and maintain their naturalness, legibility, and aesthetic coherence.

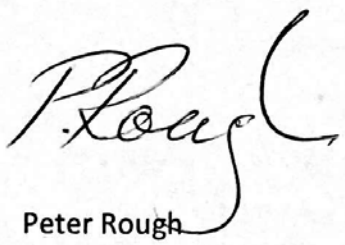
Conclusions

37 In my opinion, the proposed mine closure outcomes would result in a permanently modified landscape that, while rehabilitated and revegetated, would remain fundamentally different from the existing natural character of the Dunstan Mountains Outstanding Natural Landscape. In particular, the creation of large open pits and large engineered landforms, the substantial engineered terrace to accommodate process plant, the retained tailings storage facility, modified valley forms, and reconfigured drainage systems would introduce geomorphological features that are anthropogenic in origin and not characteristic of the schist-derived landforms that underpin the ONL's identified values.

38 Although these features are intended to be stabilised and integrated through contouring and revegetation, their scale, form, and spatial arrangement will be enduring in the landscape, thereby diminishing the coherence, naturalness, and legibility of the underlying landform patterns. Consequently, the post-closure environment would represent a permanent transformation rather than a restoration of the landscape, with adverse effects on the integrity and experiential qualities of the ONL, particularly in terms of its perceived naturalness and the continuity of its landform systems. Such effects are not readily consistent with the intent of either the Operative or Proposed District Plan provisions relating to Outstanding Natural Landscapes.

39 Considering the landscape effects that will arise from the BOGP it is my opinion that the project will not maintain the landscape values of the Bendigo Conservation Covenant area. And particularly, regarding stated outcomes for Thomsons Gorge, it is my opinion that the project will not maintain the gorge area in its present state, nor protect the landscape of the upper reaches of Rise and Shine Creek.

40 Finally, I consider that the BOGP raises broader issues of cumulative effects and precedent. The Central Otago District Plan recognises the need to protect Outstanding Natural Landscapes from incremental degradation over time. The acceptance of large-scale landform modification associated with extractive activity within an ONL, and which have enduring adverse landscape and visual effects, has the potential to establish a precedent that could, if repeated, erode the very values that underpin the ONL classification.



Peter Rough
Landscape Architect
Dip Hort, Dip LA, NZILA (Life)