

# Memorandum

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| Attention:   | Emily Walker                                 |
| Company:     | Matakanui Gold Limited                       |
| Date:        | 14/9/2026                                    |
| From:        | Rhys Girvan (Registered Landscape Architect) |
| Message Ref: | Response to CODC RF 11 Landscape Comments    |
| Project No:  | BM240011                                     |

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1. I have reviewed the feedback to my responses on Questions 18 and 19 to RFI 11, including Mr Brown's report dated 7 September 2026 on behalf of Central Otago District Council (CODC), alongside my previous evidence and the landscape Joint Witness Statements (JWS). This material does not cause me to amend the landscape conclusions most recently expressed in my responses of RFI 11<sup>1</sup> and the separate assessment of the proposed Ardgour Rise realignment<sup>2</sup>. It does warrant some further clarification of the values being assessed, the contribution of the affected land to those values, and my considerations on the reasons for the differences in opinion. I address those themes below.

## Relevant Statutory Context

2. Question 18 asks whether partial revocation of the Bendigo Conservation Covenant (BCC) would "compromise values of regional, national or international significance". In my opinion, describing an effect as regionally or nationally significant does not, by itself, explain that consequence. From a landscape perspective, I consider it necessary to identify the relevant values, explain the contribution of the affected land, and assess how the proposed changes would affect the attributes and relationships through which those values are expressed. My conclusion is that the adverse effects which result from this proposal would diminish, but would not compromise, those wider landscape values, for the reasons set out below.

## Landscape Values and Assessment Scale

3. I accept the district-plan identification of the Dunstan Mountains as an outstanding natural landscape (ONL). While I remain unpersuaded that the evidence relied upon by the other landscape experts firmly establishes the wider ONL as outstanding at the regional scale, this does not diminish my acceptance of the Bendigo heritage

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<sup>1</sup> Supplementary Evidence of David Andrew Norton, Ian Kenneth Grant Boothroyd and Rhys James Girvan (12 August 2026) in response to RFI 11, Question 18.

<sup>2</sup> Rhys Girvan (17 August 2026) Ardgour Rise – Realignment

landscape's regional and national significance. I also maintain my reliance on the specialist mana whenua evidence, including Dr Rā's identification of the ara tawhito as regionally significant, and the effects on mana whenua values acknowledged in conferencing.

4. My view on whether the Dunstan Mountains qualify as an ONL at the regional scale is informed by my previous review of district-level identification of outstanding natural features and landscapes across Otago for the Otago Regional Council's candidate outstanding water bodies investigation, together with my landscape assessment work elsewhere in Otago and Southland. The 1998 Boffa Miskell regional study did not include the Dunstan Mountains among its 12 identified outstanding landscapes of regional significance. I regard that provisional desktop assessment as relevant, although limited, historical comparative context. My assessment of this proposal rests on the specific landscape characteristics, values and relationships addressed in the current evidence.
5. I acknowledge that the Dunstan Mountains' openness, coherence, naturalness, high-country character and contribution to Central Otago's identity underpin their identification as an ONL at the district scale. I also agree that ongoing development on the Upper Clutha valley floor may reinforce appreciation of these remaining qualities from this perspective. While this changing context is relevant to how the landscape and the proposal's effects would be experienced, I do not consider that it provides, of itself, a firmer basis for identifying the Dunstan Mountains as an ONL at the regional scale.
6. When recognising the relevant landscape characteristics and values which have been evaluated at the district scale, it is also relevant to examine how the confirmed ONL boundary relates to adjoining heritage areas and influences what is understood as a coherent landscape. As it currently stands, this is also relevant to the extent the identified Bendigo Goldfield only partly lies within the CODC's confirmed ONL.

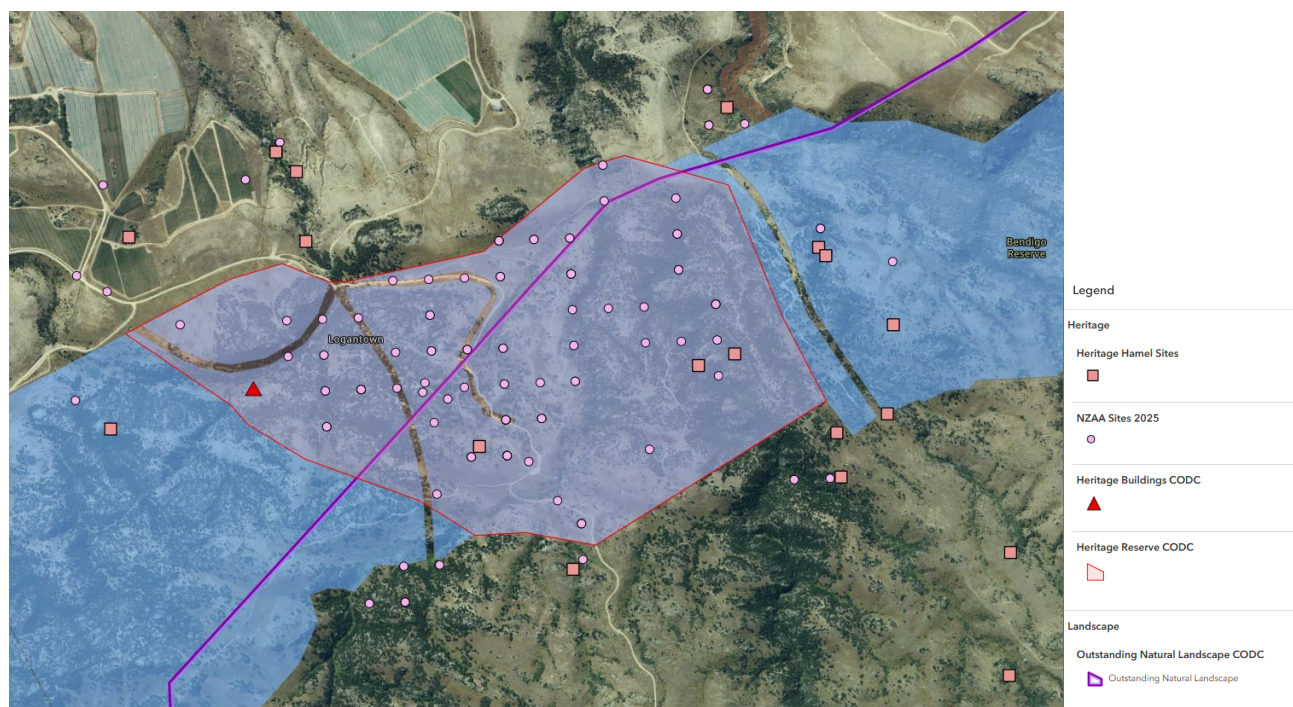


Figure 1: Dunstan Mountains ONL boundary in relation to the Bendigo Heritage Reserve.

7. In developing my initial understanding of the Dunstan Mountains' landscape values<sup>3</sup>, I considered the existing characteristics and values of the Dunstan Mountains ONL, including its relationship with the adjoining Bendigo Historic and Scenic Reserves. On that basis, I considered the ONL and adjoining reserves to form a coherent part of the South Dunstan Mountains, including land outside the mapped ONL. I recognise that the BCC revocation area contributes to the character and values of that wider landscape. I have therefore assessed both its local effects and the extent to which those effects alter the wider landscape's defining attributes and relationships.

#### Significance of landscape effects

8. I agree with Mr Brown and the other landscape architects engaged through expert conferencing that the proposed substantial landform modification and industrial activity will affect part of the Dunstan Mountain's character and values, including mana whenua values and the community's appreciation of the landscape from roads and reserves. I also accept that landscape and visual effects extend beyond the mine footprint. My disagreement concerns the weight placed on the affected area's contribution to landscape character and values and the resulting significance of those effects. I also note that apart from Rise and Shine Pit, Mr Brown also acknowledges that areas of mining activity are expected to become increasingly recessive into the future when discussing visual effects<sup>4</sup>.
9. An understanding of the direct and permanent adverse effects which result from each aspect of the project has previously been thoroughly assessed and described in the BML Landscape Assessment included within the Substantive Application and illustrated within the accompanying landscape mitigation and landscape closure plans informing the consequent landscape outcomes. This specifically identifies that the mining activities enabled by partial revocation would adversely affect some important landscape attributes, including some that contribute to the wider Bendigo gold-mining heritage landscape. My disagreement with describing the level of effects therefore concerns the consequences of those effects on identified landscape values, rather than whether such values are adversely affected.
10. I accept that mining would substantially disrupt some of the valley landforms within the revocation area and the local transition between the northern and southern Dunstan Mountains. I also accept part of the directly affected central-western landscape would be unlikely to retain sufficient attributes to be understood as part of the mapped ONL during operation. Some permanent landform changes and localised skyline and near-skyline effects would occur, but the principal form of Battery Hill (B10D) and the wider mountain sequence would remain legible, including Thomsons Saddle as the accessible low point between Mt Moka and Mt Kamaka. At the wider scale, the broad South Dunstan plateau, kānuka promontory, extensive western slopes and northern mountain sequence would continue to define the Dunstan Mountains ONL when considered as a whole. I place weight on the continuity of that broader structure, while recognising permanent local disruption and the enduring visibility of artificial landforms, particularly the Rise and Shine Pit.

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<sup>3</sup> Boffa Miskell (2024) Bendigo-Ophir Mining Project: Assessment of Dunstan Mountains Outstanding Natural Landscape

<sup>4</sup> Brown NZ Ltd. (7 September 2026) Bendigo-Ophir Gold Mine Conservation Covenant Revocation Memo Landscape Effects, page 7.

11. Beyond the Site it is important to acknowledge that the consequences for landscape experience vary with location. I agree with Mr Brown that intervening terraces substantially screen the BCC and revocation area from SH8<sup>5</sup>. I do not extend that finding to all surrounding roads, dwellings or reserves, or to the more open, long-distance views available from SH8A (Site Context Photographs 8 and 9 and VS6) and part of SH6 (Site Context Photograph 12 and VS8). My assessment considers the differing prominence of the proposal from those locations, including fixed residential views, transient views from roads and closer experiences within public conservation land.
12. As set out in my evidence, it is acknowledged that the proposal would substantially alter the local landscape with some enduring significant effects, including through permanent landform changes, while the broader mountain structure, extensive open slopes and high-country context would continue to define an essential part of Central Otago's identity. This conclusion rests on the relationship between the affected area and those wider characteristics. My closure conclusions remain conditional on the rehabilitation, access, heritage and long-term protection measures being secured and successfully implemented. Rehabilitation does not restore the pre-mining landscape or recover lost heritage fabric.
13. I therefore retain my assessment of **moderate adverse** landscape effects at the wider Dunstan Mountains ONL scale during operation. For the reasons set out above, I do not agree with Mr Brown's High rating at that scale.
14. Within the Bendigo heritage landscape, I acknowledge direct losses of important heritage fabric and changes to its relationships with valley form, water-management systems and access. Mining would also adversely affect the setting and experience of some adjoining areas within Bendigo Historic Reserve. I acknowledge the specialist heritage findings reported by Mr Brown, including the Very High heritage values identified by four of the five experts and the agreed major impact of heritage loss on the BCC's objective. My assessment of the landscape consequences includes those findings and does not treat the mapped geosite or reserve boundaries as containing or isolating the extent of heritage effects.
15. In my assessment, the wider heritage landscape would continue to be expressed through the substantial concentrations of mining and settlement remains within the Bendigo Historic Reserve, retained parts of the Bendigo Quartz Reefs Historic Area and the historic network outside the Direct Disturbance Footprint (DDF). Their setting would be adversely affected, but those retained concentrations and connections would continue to convey the wider landscape's mining history. They do not replace or compensate for the fabric and relationships lost within Rise and Shine Creek. My landscape judgment is that the losses would diminish that wider expression, while leaving sufficient continuity and legibility for its regional and national significance to remain expressed and understood.
16. Through conferencing, Mr Brown and I previously agreed that new mining must be assessed on its own merits within a landscape already containing pastoral, archaeological and mining-related modification<sup>6</sup>. I have adopted that approach. The existing modification is relevant context, as are the potential benefits of browse control and rehabilitation in improving some landscape attributes over time. I have

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<sup>5</sup> Brown NZ Ltd. (7 September 2026) Bendigo-Ophir Gold Mine Conservation Covenant Revocation Memo: Landscape Effects, page 11.

<sup>6</sup> Joint Statement of Expert Witnesses: Landscape Architecture 18, 27 and 28 May 2026, para 66.

weighed those matters against the scale, duration and permanence of the proposed changes, including the landforms and historic relationships that would not be restored. My conclusions reflect that overall balance and the effects assessment set out above.

## Ardgour Rise

17. For Ardgour Rise, I confirm my assessment of the July 2026 Rev 5 (Rev M) alignment illustrated in Figure 1 of my memorandum dated 17 August 2026. Landscape effects are assessed as Moderate adverse during construction, reducing to Low–Moderate adverse as rehabilitation establishes. I note Mr Brown’s agreement with the Moderate rating. My assessment assumes that final batter design and road-safety treatments remain within the assessed corridor, and that excess cut is managed within an otherwise assessed or authorised disturbance area without creating additional disposal landforms. In response to CODC’s concern about the drawings defining the proposal, I consider that the assessed alignment and relevant landscape measures should be clearly identified in the approval documents and understand that to be what is proposed.

## Conclusion

18. Having considered the additional material, I reaffirm my latest landscape conclusions, subject to the assumptions already identified. I accept significant and, in part, permanent adverse effects on an important part of the BCC. For the reasons above, I continue to consider that partial revocation would diminish, but would not compromise, the expression of the wider landscape values which may be considered significant at the relevant regional or national scales. This conclusion is confined to the landscape matters within my expertise and does not revisit or qualify the specialist evidence concerning effects on mana whenua, heritage or ecological values.