

Memorandum



To: Shay McDonald | Principal Consent Planner
Organisation: Otago Regional Council
Address: [REDACTED]
From: Nigel Parker | Technical Director, Landscape Architecture
Date: 16 February 2026 SLR Project No. 860.016776.00001

RE: Bendigo Orphir Mining Project - Landscape Architectural Review - Response to Applicant's Memorandum (30 January 2026)

Dear Shay,

As requested, I have reviewed the 30 January, 2026 Landscape Memorandum supplied by Santana Minerals and prepared by Rhys Girvan of Boffa Miskell. Alongside ORC, I also attended a meeting with the applicant and their Landscape Architect, Rhys Girvan on 22nd January, 2026 to discuss their proposed response.

Please find below my opinion and recommendations having considered the above.

Question 1.

It is the opinion of Mr Parker that the overall landscape effect of the proposal at the site level will be a high adverse effect (utilising the seven-point scale in Te Tangi a te Manu), which corresponds to significant adverse effects in typical RMA language, even after successful implementation of the Landscape and Ecological Rehabilitation Management Plan. Consequently, SLR recommend that these residual adverse effects be offset via approximately 65 hectares of revegetation at a suitable offsite location. Please discuss this recommendation, including any reasons for agreement or disagreement, with reference to sections 3.2.1 – 3.2.4 of Mr Parker's memorandum.

Both the applicant and myself agree to the overall landscape effect when considered in the wider context of the broader Dunstan Mountains ONL.

I agree with the applicant's applied degrees of effect for the individual elements within the mine across the periods assessed for landscape effects at the site level. I agree with the applicant's method and reasoning for assessing the individual elements.

Haul Roads

With respect to the Haul Roads, I note the applicant's additional comments and agree that the Haul Roads could have **Moderate-High** effect during the mid period (years 3-11). However, I remain of the opinion that until detail with regard the extent of land modification for construction of the roads is known, even though contained within the relative enclosure of Shepards Creek and lower northern slopes of Battery Hill, localised landscape effect (which is what is being assessed), could be **High**.

Overall Site Landscape Effect

I remain of the opinion that in not assessing an overall landscape effect at the site level, in addition to the landscape effects of the individual elements, landscape effects are overlooked and not fully captured.

I do not agree that a combined landscape effect at the site level would be an artificial combination. On the contrary, it is my opinion, that in addition to the individual landscape effects considered by the applicant an overall site level rating would provide a fuller and more accurate portrayal of physical and perceptual landscape effect.

For example, as can be seen from the applicant's plans, the Come In Time Pit, Western Engineered Land form, Rise and Shine Pit, Processing Plant, Haul Roads and Sheperds Engineered Landform would all be experienced together to greater or lesser degrees. The physical and perceptual landscape effects of these elements operating together has not been considered.

Whilst I appreciate the need to assess the individual landscape effects of the various elements and agree that this approach is of assistance to understanding, it is my opinion that to do so in a void and not consider the interaction of the elements together can be considered an artificial approach.

In addition the applicant's landscape architect has not explicitly provided response to explain how the proposal will influence interstitial spaces between the various elements and where effects to these are considered. In my opinion it is through providing an overall site level landscape effect that such activity would be covered.

Associative Landscape Effect

With regard Associative effect I remain of the opinion that long term landscape effect will not dissipate to neutral over time as the loss of immediate connection to the landform of the past is permanent.

I do accept and acknowledge the arguments put forward by the applicant's Landscape Architect. I do agree that these are mitigating factors, however they can not eliminate the immediate connection to the landform of the past that is lost and inherent in the proposed modification. In my opinion this must be recognised. As such I assess the long term degree of associative landscape effect to be **Low** and not negligible.

Remaining High Landscape Effect (Rise and Shine Pit)

I acknowledge that through submitting the Landscape and Ecology Rehabilitation and Management Plan (LERMP) the applicant has set out a mitigation approach that has considered the landscape value of the site. I acknowledge that the LERMP, combined with the Landscape Closure Plan proposes an approach that avoids, remedies, and mitigates adverse effects as far as practicable on site.

However notwithstanding this, both the applicant's landscape architect and I agree that there remain high landscape effects that are not dealt with on site.

Given this, if the proposal is to be granted resource consent, I recommend further mitigation measure is adopted to reduce these residual landscape effects. Both the applicant's landscape architect and myself agree that no further mitigation is possible on-site. I therefore see no other option to reduce landscape effect other than by providing an off set and to the extent I have proposed.

The applicant's landscape architect raises the prospect that off-setting could also introduce unrelated landscape change elsewhere without a clear, values-based equivalence test responding to effects on landscape values. To that end, I recommend a values-based assessment is provided alongside the eventually selected site for planting off-setting to ensure landscape effects are positive.



Question 2.

Please confirm how the colours of the exposed faces of pits, engineered landforms, and stockpiles have been determined, and whether these colours (as illustrated in the visual simulation reports B.19B) are accurate?

I am satisfied with applicant's response as to how the colours of the various elements and exposed faces were determined and illustrated within the visual simulations. I am satisfied that reasonable care has been taken to accurately simulate colour.

Question 3.

Please clarify whether it is the intention of MGL to prepare and submit to Council for certification detailed plans for rehabilitation works within each landscape management unit. If MGL do not intend to submit detailed plans to Council, please explain why.

It is noted that the applicant agrees that the (LERMP) shall be subject to ongoing Council Certification. It is acknowledged that consent conditions C34 - C45 provide objectives and and reinforce the implementation of the LERMP. It is acknowledged that C20 provides for council certification in the event of amendments to the LERMP. It is also noted that C44 provides a monitoring clause to enable correction and rectification of non-performance annually after the event of failure.

However, no mechanism is provided to measure whether the implementation of the LERMP will be appropriate. No mechanism is provided to assess whether the LERMP is being implemented in line with C35 and no mechanism is provided to reduce the risk of failure pre-emptively.

Consequently, I re-iterate my recommendation that six (6) months prior to rehabilitation works commencing on site for each Landscape Management Unit (LMU) professionally prepared detailed plans, schedules, specifications and maintenance proposals must be submitted in accordance with the LERMP for review and approval by ORC.

I note that such a recommendation is standard practice, and that nothing in the applicant's supplied documentation provides sufficient reason to deviate from standard practice.

Question 4.

Please provide the modified and additional plans described in Section 3.2.8 of Mr Parker's memorandum.

The plans requested have been provided and include the requested information.

Mitigation planting be incorporated and landscape plan submitted for approval by ORC for the surrounds of the buildings of the worker's camp.

At the meeting with the applicant, it was clarified that the worker's camp will be on site for a temporary period of two (2) years. As a consequence, I agree that no mitigation planting will need to be installed to the surrounds of the worker's camp.



Regards,
SLR New Zealand

Author



Nigel Parker, BLA

Landscape Architect | Technical Director



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