Before the Expert Panel appointed under the Fast-track Approvals Act 2024

Under	the Fast-track Approvals Act 2024 (**Act**)
And	
In the Matter of	an application for approvals by Matakanui Gold Limited to establish, operate, rehabilitate and ultimately close an open pit and underground gold mining operation known as the Bendigo-Ophir Gold Project

Statement of Evidence of **Rhys James Girvan** on behalf of **Matakanui Gold Limited** in response to Section 53 Feedback

Landscape and Amenity

Dated: 17 April 2026

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INTRODUCTION

1. My name is Rhys James Girvan.

2. I hold the qualifications of master's in landscape architecture from Lincoln University and Bachelor of Arts majoring in psychology from the University of Canterbury. I am a registered member of the New Zealand Institute of Landscape Architects (**NZILA**).

3. I have been a landscape planning consultant for Boffa Miskell Limited (**BML**) since April 2012 and currently employed as a Senior Principal Landscape Planner in BMLs Christchurch office and BML's Landscape Planning Technical Lead.

4. I have practiced as a landscape planner for approximately 22 years. My experience includes the assessment of landscape and visual effects for development projects of many types and scales, including infrastructure use and development encompassing windfarms, utilities, quarries, mines, landfills, and roading projects. I am experienced in preparing district and region wide landscape assessments which recognise and articulate important landscape values including Outstanding Natural Features and Landscapes as well as preparing landscape plans and associated rehabilitation strategies to support successful development proposals within a wide range of natural, rural and urban contexts.

5. This statement is given as part of Matakanui Gold Limited's (**MGL**) response to comments on the Bendigo-Ophir Gold Project (**BOGP**) made under Section 53 of the FTA. This statement responds to specific comments raised by:

   (a) Department of Conservation (**DOC**);

   (b) Otago Regional Council (**ORC**);

   (c) Central Otago District Council (**CODC**);

   (d) Iwi Authorities and Treaty Settlements;

   (e) Owners and Occupiers of the land to which the Substantive Application Relates;

   (f) Owners and Occupiers of Adjacent Land;

   (g) Forest and Bird;

   (h) Sustainable Tarras; and

   (i) Environment Defence Society (**EDS**).

6. My original findings are provided in full in:

   (a) B.19 Boffa Miskell Landscape, Natural Character and Visual Effects Assessment (the '**Assessment**').

7. BML were also co-authors of:

   (a) G.07A Landscape and Ecological Rehabilitation Management; and

   (b) G.07B Landscape and Ecological Rehabilitation Management Plan Appendices.

8. Although this is not an Environment Court proceeding my confirmation of compliance with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 is included in Substantive Application Document A0.2B.

SPECIFIC RESPONSE TO COMMENTS

9. In my evidence, I respond to the principal landscape, visual and natural character matters raised in comments and expert reviews on the application. For ease of reference, the comparative effects identified in my Assessment and in the relevant findings of technical peer reviews from landscape architects in evidence have been drawn together in **Appendix A**, which consolidates the key areas of agreement and difference. The discussion that follows should therefore be read alongside that table and focuses on the substantive issues that remain in dispute, rather than repeating matters where there is broad alignment.

Department of Conservation

10. In response to DOC's comments, I acknowledge that the Project is located within the Dunstan Mountains Outstanding Natural Landscape (**ONL**) as defined in the Central Otago District Plan. In this context, DOC raises concerns about the combined overall landscape effect of the proposal. It also raises concerns about permanent landform change, partial revocation of the Bendigo Conservation Covenant, and whether residual high landscape effects should be addressed by offsetting or compensation. In landscape terms, the key issues requiring response are therefore the significance of the ONL and the integrated heritage landscape values of the Project area. This includes the extent to which historic legibility and connection to the landscape would be altered, the extent to which rehabilitation can realistically avoid, reduce and reintegrate those changes over time, the implications of partial covenant revocation for landscape coherence, visual integrity and public access, and the nature and acceptability of any residual adverse effects.

11. At the Site scale, the Assessment identifies that the Project will inevitably result in high adverse landscape effects in some parts of the Site. However, those effects remain contained within the more immediate Project Site on private freehold land spanning Bendigo and Ardgour Stations, and do not equate to the same level of effect on the wider Dunstan Mountains ONL.

12. In my opinion, the matters that materially reduce the level of effect when considered in the context of the broader ONL are:

    (a) the distinction between localised Site scale effects and effects on the wider Dunstan Mountains ONL as a whole;

    (b) the extent to which the Site already reflects pastoral use, historic and more recent mining activity, tracks, and public access influences, including Thomsons Gorge Road through Thomsons Saddle;

    (c) the extent to which the key defining attributes of the ONL, including its broad mountain backdrop, skyline, landform transition, openness and general naturalness, remain evident and legible; and

    (d) the extent to which project shaping, progressive rehabilitation, access reconfiguration and closure measures materially avoid, contain, reduce and reintegrate adverse effects over time.

13. In terms of the Bendigo Conservation Covenant, I do not consider the effects of partial revocation are properly characterised as the permanent loss of landscape values overall. Rather, in landscape terms, the proposal would result in a localised and transitional reduction in protected extent within a broader landscape framework that remains protected, representative and legible. While significant landscape effects within part of the existing covenant extent are inevitable, I consider the retained covenant land, together with the wider Dunstan Mountains ONL within which it sits, will continue to maintain the representative landform and vegetation pattern and the broader landscape values for which protection was sought. Considered at that scale, I do not consider the proposed amendment or partial revocation would compromise values of regional, national or international significance.

14. In relation to cultural and heritage matters, I accept these are important components of the landscape and that the loss of specific heritage features within Rise and Shine Creek is a relevant matter. However, the Bendigo area derives much of its meaning from the broader network of landforms, routes, mining remnants, pastoral patterns and public access that together make that history and association legible. On that basis, while I consider there will be direct adverse effects on some existing heritage

landscape elements, I do not consider the wider historic and associative landscape values of Bendigo would be lost. The reinstatement of pedestrian access through Thomsons Saddle and Rise and Shine Creek following completion of mining, and the continued ability to experience both historic and more recent mining activity as part of a layered landscape subject to ecological restoration, are relevant in that regard.

15. In response to DOC's comment that any remaining high landscape effects within the Site that cannot be addressed onsite should be addressed by offsetting or compensation, I do not accept that further landscape offsetting necessarily follows. While high adverse landscape effects remain in parts of the Site, those effects reduce when assessed in the context of the wider Dunstan Mountains ONL, where overall adverse effects are moderate during operation and low-moderate at closure. In landscape terms, any further on-site or off-site response would need to be supported by a values-based assessment demonstrating a clear nexus and equivalence to the residual effects that remain, rather than assuming that additional planting or other change elsewhere would appropriately address Site-scale effects arising within the Bendigo landscape.

Otago Regional Council

Nigel Parker (Registered Landscape Architect)

16. Mr Parker's memoranda record a substantial measure of agreement with the Assessment. The matters he raises are relatively confined, namely the rating of haul road effects, whether a separate overall site-level landscape rating should be assigned, the treatment of associative landscape effects, whether off-site landscape offsetting is warranted, and the level of detail to be provided for rehabilitation implementation. Following my response to ORC's initial landscape queries on 30 January 2026, those areas of disagreement narrowed further.

17. At the broader landscape scale, Mr Parker agrees with the Assessment that the proposal would result in moderate adverse effects during operation and low-moderate adverse effects at closure in the context of the wider Dunstan Mountains ONL. He also accepts that assessment of effects by individual project element is a necessary and appropriate approach and is generally in agreement with the ratings assigned to those individual elements, subject only to a qualification that haul road effects could be greater depending on final detail and construction extent.

18. Importantly, Mr Parker does not identify substantive disagreement with the natural character assessment. The same is true of visual effects. While he initially sought clarification regarding the colour treatment used in the visual simulations, following my response and his subsequent March 2026 site visit he confirmed agreement with

the assessed visual effects. I therefore proceed on the basis that the natural character and visual components of the Assessment are not materially in dispute.

19. The remaining disagreement is therefore comparatively narrow. It relates principally to whether an additional overall site-level landscape rating should be assigned during operation, the extent to which associative effects persist at closure, and whether off-site landscape offsetting is appropriate. In my view, those matters do not displace the broader expert agreement reached on the key landscape, natural character and visual findings. In particular, Mr Parker and I agree that, when considered in the context of the wider Dunstan Mountains ONL, adverse landscape effects are moderate during operation and reduce to low-moderate at closure.

20. Against that background, I do not agree that off-site landscape mitigation is required. While Mr Parker accepts that the LERMP and closure plans provide an appropriate on-site response, and that no further meaningful opportunity exists for revegetation within the site itself, he nevertheless recommends 65 hectares of off-site planting. In my opinion, that would not respond directly to the identified landscape effects, nor would it alter the physical or associative effects occurring within the affected landscape itself. It instead risks treating planting elsewhere as a proxy for mitigation without any clear values-based equivalence to the landscape values affected by the proposal.

Central Otago District Council

Stephen Brown (Registered Landscape Architect)

21. Mr Brown's review is similarly supportive in finding that the Assessment is generally wide-ranging, detailed and supported by visual simulations that accord with NZILA Best Practice Guide 10.2. The principal point of difference is therefore not whether adverse effects arise, but the extent to which he considers the proposal changes the naturalness, cohesion aesthetic appeal and wider values of the Dunstan Mountains ONL, and the weight he places on that conclusion in his overall planning judgment in terms of Objective NFL-01 of the Proposed Otago Regional Policy Statement and Objective 4.3.2 of the Central Otago District Plan.

22. I acknowledge that Mr Brown's concern is that, during mining operations, the pits and engineered landforms would interrupt the continuity of the Dunstan Mountain range and could conceivably result in the ONL being "cut in two" around the Site for a significant period. However, that proposition sits alongside his acceptance that the broader Dunstan Mountains retain their ONL status and that many broader landscape characteristics and values endure. In my opinion, the more reliable reading of his evidence is that he identifies a substantial but localised interruption during the operational period, rather than a permanent loss of the wider ONL's integrity or status.

23. I consider the criticism that associative values have not been adequately recognised is overstated. The first aspect of assessment undertaken was to understand and articulate the key landscape values within which mining activity is proposed[1]. In my opinion, those values plainly inform the assessment's consideration of how the proposal would affect the landscape's relevant dimensions including the continuity and experience of the traditional route through Matakanui, the legibility of historic gold mining associations, recreation and reserve access, high country farming character, and the broader sense of place and identity of the Bendigo–Tarras area. Identity is neither singular nor static, but an evolving expression of the area's landform, productive use, history and contemporary associations, including viticulture. The Assessment may not have addressed those matters in the structure or level of detail preferred by Mr Brown, but that is different from saying they were not brought to bear in the assessment of effects. In my opinion, the issue is therefore one of degree and weighting, not omission.

24. While the BOGP would introduce a more pronounced modern mining influence within part of the Dunstan Mountains, I do not consider that influence would redefine the identity of the Bendigo–Tarras area overall. In my opinion, effects on identity are better understood as localised effects on the experience and character of the Site and its immediate surrounds, rather than as a significant change to the wider public image, sense of place or recognised landscape identity of Dunstan Mountains ONL the Bendigo–Tarras area when considered as a whole.

25. While I agree with Mr Brown that visual effects should not be reduced to mere visibility, change in outlook, or a simple amenity consideration, I do not accept that the Assessment failed to address the landscape values experienced in the view. When read as a whole, the Assessment identifies the relevant physical, perceptual and associative values of the Dunstan Mountains ONL, including its naturalness, coherence, skyline, legibility, wider landscape relationships including meanings and cultural associations. On this basis, it then uses representative viewpoints to assess how those values would be experienced and altered during relevant phases of proposed activity. In my opinion, that is an integrated assessment of landscape and visual effects. The real point of difference is therefore not whether values in the view are relevant, but the extent to which the proposal changes those values at the scale of the wider ONL.

26. Mr Brown's comparative visual assessment also reveals an important inconsistency between the ratings he attributes to a small number of selected public viewpoints and the ratings he later applies to the broader viewing audiences said to be

[1] The Central Otago District Rural Review Landscape Assessment (2007) was prepared by LA4 Landscape Architects. The later Bendigo-Ophir Gold Project Assessment of the Dunstan Mountains Outstanding Natural Landscape (2024) was prepared by Boffa Miskell in accordance with Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines (2022).

represented by them. While his Table 1 assigns high ratings to VP2, VP3, VP7 and high to very high ratings to VP8, those elevated ratings are not consistently reflected in Tables 2 and 3, where the corresponding residential and wider audience assessments are generally lower and more variable. For example, although VP2 and VP3 are treated as highly affected viewpoints, most Ardgour Road and SH8-related residential viewpoints are assessed as very low with one moderate (ID 35) and one moderate-high effect (ID 12), neither of which are similarly deemed significant. Similarly, while VS7 and VS8 are rated high to very high, the comparable SH6 and Queensberry audience areas are then assessed as moderate and high.

27. In my opinion, this indicates that the more severe ratings attached to those selected viewpoints are not representative of the broader audience experience and corresponding implications for the landscape values as experienced in views. The particular viewpoints chosen to prepare visual simulations and assess visual effects were specifically chosen because they are particularly open or exposed to the proposal from a particular viewing area. This degree of visibility is not uniformly experienced when considering the nature of available views within the surrounding landscape. In my opinion the more limited nature of views beyond the Site, including through the specific mine design also helps in terms of managing the potential for more significant adverse landscape and visual effects.

28. Conversely, Mr Brown expressly states that he is satisfied with BML's approach to natural character and is comfortable with the assessment that effects peak at moderate for Rise and Shine Creek and moderate-high for Shepherds Creek. He also notes that vegetation-landcover effects are more limited than the geomorphic and hydrological changes, and that pest exclusion and wider rehabilitation should ultimately have positive effects.

29. In relation to lighting, Mr Brown accepts that the proposed conditions are likely to suppress much of the lighting associated with permanent infrastructure and that more permanent or underground components may well be consistent with dark sky requirements, with his principal concern directed to the temporary open-cast phase, headlight wash, and mobile task lighting. I agree that those aspects require careful control, but they are operational and manageable matters rather than a basis for materially altering the overall night-time landscape and visual conclusions already reached.

30. As to rehabilitation, I accept that some aspects of the cushionfield and herbfield restoration programme involve uncertainty. However, Mr Browns records that the rehabilitation strategy is staged, includes early trials, live transfer, translocation, monitoring, and links completion of some later stages to the performance of those restoration measures. In my opinion, that is not a case of relying on questionable

viability; rather, it is an adaptive rehabilitation framework that expressly recognises uncertainty and manages it through sequencing and performance-based implementation.

31. Overall, I do not consider the peer review of Mr Brown demonstrates that the proposal is fundamentally inconsistent with the statutory landscape framework. Instead, it confirms a more nuanced position: more localised and at times significant adverse effects would arise within part of an acknowledged ONL, but the broader mountain backdrop, memorable skyline, and wider landscape relationships would endure.

Iwi Authorities and Treaty Settlement

Dr Alayna Rā (Registered Landscape Architect)

32. Dr Rā's evidence raises important concerns regarding the treatment of tikanga Māori, wāhi tīpuna, ara tawhito, and the extent to which those matters have informed the Assessment. I acknowledge those concerns and the importance for ongoing relationships between mana whenua and MGL to protect the places, values, and relationships of significance. In preparing the Assessment, BML have considered and acknowledged cultural values where this information was made available.[2] In the time available to prepare my evidence, I have also since read the *Cultural Impact Assessment: Bendigo Ophir Gold Project* included in the comments from Edward Ellison. I am aware that this material includes identification of wāhi tīpuna, ara tawhito, and mahika kai which have not been disregarded in shaping project outcomes. This is expressed through the physical inclusion of taramea in the proposed rehabilitation and the reinstatement of access along Rise and Shine Creek as part of closure outcomes. Beyond these cultural dimensions, I recognise other cultural values of importance endure, including how other important values may be affected, and do not purport to speak for Māori interests.

33. In terms of other concerns relating to industry best practice assessment of mining proposals, I do not accept key matters have been omitted and findings cannot be relied upon for decision making. The Assessment expressly identifies a comprehensive analysis of the existing landscape within which mining activity is proposed and examines the principal mine components and sources of change including cumulative effects. This process has included reference to maximum heights and extents including composition of 3D data and modelling, fieldwork, representative viewpoints and NZILA-compliant visual simulations to evaluate visibility, prominence and clearly articulates landscape mitigation and closure scenarios of combined mining elements. Lighting is also explicitly assessed in a

[2] Kai Tahu (2018) Cultural Values Statement, Kā Huru Manu, Ngāi Tahu Atlas, 2023.

separate specialist lighting report (B.31 Cosgroves Limited Exterior Lighting Report (Cosgroves 2025)).

34. BML were also co-authors of the G.07A & B Landscape and Ecological Rehabilitation Management Plan (**LERMP**), and as such, rehabilitation has not been treated as merely aspirational statements. The Assessment identifies the landforms that will remain, distinguishes those that will be backfilled or decommissioned, and describes the intended rehabilitation response and trajectory for open pits, engineered landforms, haul roads, the tailings storage facility (**TSF**) and spaces in between. It also assesses the nature of mine regeneration required during operation and at closure, recognising that these actions will ensures the effects of mining activity can reduce progressively as rehabilitation within the DDF occurs. This has required a substantive assessment of anticipated landscape change through time and builds upon a detailed understanding of mine rehabilitation through a collaborate process wherever possible.

35. In terms of assessing the specific effects on natural character, the Assessment has necessarily taken account of the existing degree of modification that is presently apparent along Shepherds Creek and Rise and Shine Creek. This is not a pristine landscape with existing high natural character but a modified context through previous both previous mining activity and ongoing pastoral land use. This analysis is set out in detail in Section B of the Assessment in accordance with Te Tangi a te Manu Aotearoa: New Zealand Landscape Assessment Guidelines (New Zealand Institute of Landscape Architects, 2022) (**TTAtM**) which requires taking account of the distinct combination of the area's natural characteristics and qualities, including its degree of naturalness. On this basis I disagree that natural character in terms of RMA Section 6(a) effects are high. This is also agreed between most of the other landscape experts.

36. Landscape effects have similarly taken account of the interwoven relevant landscape dimensions which include perceptual and associative dimensions and implication apparent beyond the Site.

37. The evidence of Dr Rā considers that a Te Ao Māori framework should prevail. In response, I consider that TTAtM adopts a bicultural methodology that seeks alignment between Te Ao Māori and Te Ao Pākehā streams of landscape assessment which continues to evolve. As it stands, I consider the Assessment remains sufficiently robust for the purpose of assessing landscape, natural character, and visual effects.

Owners and Occupiers of Land to which the Substantive Application Relates

Peter Rough (Landscape Architect)

38. Mr Rough owns a property in Bendigo Loop Road and is informed by long familiarity with the Ardgour and Bendigo area. In his capacity as a Landscape Architect, Mr Rough has also provided expert evidence. Through he generally prefers the description of landscape values set out in the evidence of Ms Gilbert on behalf of Sustainable Tarras, he appears to support the Assessment's understanding of the project setting and concurs with the selection of viewpoints used in the Graphic Supplement. The principal difference in findings is not whether the landscape is valued, but the degree to which the proposal, including rehabilitation and closure, would alter those values in landscape terms.

39. I do not accept that the visual simulations materially understate the proposal simply because some of the source photography was taken under cloudier conditions. The simulations remain useful because they accurately depict the form, scale, extent and spatial relationship of the proposal from surveyed viewpoints. While different atmospheric conditions may influence tonal contrast on a particular day, they do not alter the underlying extent of visibility or the broader conclusions reached in the Assessment, which are based on landform modification, viewing distance, elevation, orientation and progressive rehabilitation, rather than tonal contrast alone.

40. I also do not accept that the operational assessment fails to capture the cumulative effect of the proposal as a whole. The Assessment considered the combined influence of pits, haul roads, process plant, the TSF, and progressive rehabilitation across the relevant stages of mining. My conclusion of moderate adverse operational broad scale landscape effects reflects that combined judgement. It is not an assessment of individual components in isolation, nor does it overlook the extent to which mining activity would be evident during the operational phase.

41. In relation to backfilling, engineered landforms and other closure outcomes, I accept that closure will not restore the Site to its pre-mining condition. However, the relevant question is not whether all evidence of mining disappears, but whether the resulting landform can be stabilised, rehabilitated and read as a coherent part of the wider landscape without giving rise to effects of a greater order than identified. In my opinion, the proposed closure strategy, including selective backfilling, removal of plant, and rehabilitation of disturbed land, achieves a materially better outcome than leaving an unrestored mine landscape, while also responding to engineering, operational and rehabilitation constraints that are addressed in more detail by the relevant technical witnesses.

42. I also accept that revegetation in Central Otago involves managing inherent uncertainty and that establishment will take time. For that reason, my assessment does not assume immediate or perfect rehabilitation. Rather, it considers the likely trajectory of the landscape as rehabilitation is progressively established, together

with the fact that some landform modification will remain discernible. That uncertainty does not, in my opinion, justify treating all rehabilitated landforms as though they will remain bare, raw or visually dominant indefinitely.

43. Nor do I agree that the retained process plant platform, TSF, engineered landforms or Rise and Shine Pit mean that the proposal necessarily fails to maintain the values of the wider Dunstan Mountains ONL or the Bendigo Conservation Covenant. Those matters turn on the extent to which the broader landscape remains legible, coherent and representative notwithstanding localised and, in some respects, enduring change. For the reasons set out in my Assessment, and in response to Ms Gilbert, I remain of the view that while the proposal would result in significant site scale modification, it would not do so to the extent that the wider Dunstan Mountains ONL loses its defining character and values overall, or that the covenanted landscape values are not maintained in the broader sense.

44. Mr Rough's submission places considerable weight on an absolute avoidance framing. My landscape opinion remains that the appropriate task is to identify the character and level of effects, including the extent to which those effects are reduced through design, rehabilitation and closure. On that basis and having regard to the confined part of the ONL directly affected relative to the continuing legibility of the wider schist-derived landform pattern, I do not agree that the proposal would result in a wholesale transformation of the Dunstan Mountains ONL into a modified landscape.

Cheryl Lucas

45. Ms Lucas's submission reflects a longstanding personal and artistic relationship with Bendigo, and I accept that it vividly expresses qualities of openness, quietness, light, schist landform and dryland vegetation that are important to the area's landscape character and sense of place. I also accept her concern that rehabilitation in this semi-arid environment is inherently challenging. However, I consider the submission overstates the extent of landscape change by framing it as irreversible damage to the landscape more generally. In my view, the proposal would create substantial localised adverse effects within the mine setting, but not a wholesale loss of the wider Bendigo or Dunstan Mountains landscape character to the extent suggested.

Bruce and Sandra Calder

46. Mr and Mrs Calder's submission plainly reflects a strongly held concern that the quiet rural character and amenity they value around Thomsons Gorge Road would be diminished by the proximity of the mine. I accept that those concerns are legitimate, particularly given the relative proximity of their property to parts of the proposal and the importance they place on recreation and day-to-day enjoyment of

the area. However, the submission tends to frame the landscape consequences in expansive and absolute terms.

47. In my view, while the proposal would create substantial localised change within the Site, this will remain separated from this dwelling including no direct potential views of the mine (refer BML ref. 4 identified in Figure 10 and Appendix 4 of the Assessment)[3]. Beyond this I do not consider the proposal would result in the wider landscape becoming an industrial landscape to the extent asserted. The landscape assessment remains one of degree, scale and extent, and on that basis, I consider the most pronounced effects would remain concentrated within the Shepherds Creek and Rise and Shine Creek catchments and their immediate setting.

Folding Hill Wine Company Limited

48. The Kerruish Family submission reflects a serious and understandable concern that the Bendigo landscape is fundamental to the character, operation and long-term value of an established intergenerational vineyard business, and I accept that the family's emphasis on landscape integrity, rural amenity and the sensitivity of premium viticulture to nearby industrial activity is relevant context for the assessment. The Assessment has considered the nature of effects from Folding Hill Vineyard at 445 Bendigo Loop Road (BML ref. 45) and concludes that views from this location towards the proposed mine are screened by intervening landform. Having revisited 3D modelling which assisted this assessment, I consider this assessment accurate and visual effects within the Site will remain well contained beyond the intervening scarp of Bendigo Terrace resulting in negligible visual effects.

49. Overall, while I accept that the proposal will result in substantial physical change within the area of mining operations at the Project Site, I remain of the opinion that broader effects beyond the Site remain relatively shielded from views by being located in a valley. In the longer term, those effects will also be progressively reduced through rehabilitation, management of disturbed landforms and vegetation, and the completion of mining activity, such that they do not extend across the wider Bendigo landscape to the extent suggested.

Gibbston Valley Wines Limited

50. For similar reasons, I acknowledge the concerns of Gibbston Valley Wines Limited (BML ref. 55). In visual terms, however, the "School House" vineyard occupies an elevated northern aspect overlooking Upper Clutha Basin towards the Pisa Range and Grandview Mountains and remains separated from potential open views of the proposed mine. Having regard to the proposed management and rehabilitation

[3] No private property has been visited to confirm visual effects.

measures, I do not consider those concerns extend to broader adverse effects across the wider Bendigo landscape.

Owners and Occupiers of Adjoining Land

Diane Jean Lucas (Registered Landscape Architect)

51. Ms Lucas has provided comments and evidence as an owner of adjacent land. Ms Lucas' evidence address four main matters in response to the Assessment: first, whether sufficient site-scale landscape analysis was undertaken; secondly, whether the junction area and the Bendigo Conservation Covenant have been adequately recognised; thirdly, whether the proposal's effects on the wider Dunstan Range ONL have been understated; and fourthly, whether rehabilitation and mitigation can properly be relied upon.

52. The principal difference between Ms Lucas and the findings set out in the Assessment are evaluative. Ms Lucas accepts that the Rise and Shine Pit would have high landscape effects and that the Site occupies a distinctive and accessible part of the mountains, but from that concludes that the proposal must also therefore have high adverse effects on the wider ONL. In my opinion, that does not necessarily follow. The Assessment already recognises high localised effects for major components within the Site. The question then becomes whether those effects alter the coherence, legibility and experiential values of the Dunstan Mountains ONL as a whole to the same degree. My conclusion remains that they do not. The physical change is confined to a relatively small part of a much more extensive mountain landscape and backdrop and does not displace the broader geomorphic pattern, its overall legibility or its broader enduring associations.

53. With respect to the Bendigo Conservation Covenant, I do not agree with Ms Lucas' suggestion that its landscape values have not been assessed. The covenant and its objectives are expressly identified in the Assessment's statutory context, and the landscape effects on the relevant part of the Site, including physical, perceptual and associative dimensions, are addressed through the site-scale evaluation. The fact that I did not prepare a separate standalone landscape assessment exclusively for the covenant area does not mean its values were omitted. Rather, those values were assessed in the context in which the covenant land is actually experienced and affected, including reinstating recreation access along the current Thomson Gorge Road through the Rise and Shine Valley as part of mine closure alongside extensive ecological restoration and habitat enhancement programme across the areas of Covenant proposed to be uplifted. Ms Lucas' conclusion that revocation or amendment could never be appropriate is, in my view, more absolute than the landscape evidence supports.

54. Finally, I do not accept Ms Lucas' position that no reliance should be placed on rehabilitation or mitigation. The Assessment does not assume that all effects are eliminated or that landscape recovery is immediate. To the contrary, it identifies residual high adverse effects that remain, particularly in relation to the Rise and Shine Pit, while also recognising that progressive rehabilitation, regeneration and long-term management will materially reduce effects elsewhere and improve the broader ecological and landscape context over time. In that respect, the real issue is the robustness of implementation and conditions, not whether rehabilitation should be disregarded altogether.

55. Overall, Ms Lucas raises a more absolute disagreement with the conclusions of my Assessment than with its underlying description of the Site. In my view, her comments do not identify any omission that materially undermines the assessment methodology or the identification of site values. Rather, they reflect a different evaluative judgment as to the weight to be given to a highly distinctive but still localised part of the Dunstan Range in assessing broader ONL effects.

Bruce Lambie

56. I acknowledge Mr Lambie's submission as expressing a clear and strongly held concern that the proposal would industrialise an iconic Central Otago landscape. However, while that position reflects the seriousness with which he views the proposal, it is stated in broad and absolute terms and does not engage with the actual extent, containment and visibility of the proposed change. I accept that there will be substantial adverse landscape effects within the affected catchments, particularly during the operational life of the mine, but I do not accept that the proposal will destroy the wider Dunstan Mountains landscape as asserted. In my view, the principal landscape effects are more localised than the submission suggests, albeit still important and requiring careful management and rehabilitation.

Canyon Vineyard

57. Mr Johnston's submission plainly reflects a strongly held concern that the landscape setting, tranquillity, visitor experience and sense of place qualities which underpin his business would be diminished by the proposal. While I accept that those concerns are sincerely held and that they are relevant, particularly in understanding the perceptual and associative dimensions of the receiving environment I do not consider there will be landscape change across the wider area to the full extent suggested in the submission. Issues of market response, commercial loss and buyout are matters for other experts rather than landscape evidence.

58. Beyond this, I accept that Mr Johnston's use of the Bendigo Historic Reserve, including walking and mountain biking on the Kanuka and Aurora Creek trails, gives him a direct appreciation of the landscape qualities that contribute to Bendigo's

sense of place. However, I do not agree that the proposal would fundamentally destroy the tranquillity and character of those trails. The Assessment records that views from the Bendigo Scenic Reserve, including the Kanuka Loop, are generally limited by intervening topography, and that views from areas near the Bendigo Historic Reserve are similarly constrained.

Forest and Bird

59. I acknowledge Forest & Bird's concern in relation to landscape, particularly that the Bendigo Conservation Covenant was intended to maintain the landscape values of the covenanted land, including those associated with Upper Bendigo Creek / Rise and Shine Creek. However, I do not accept that partial revocation, of itself, establishes that those landscape values would no longer be maintained.

60. As I have explained in my statement of evidence in response to the Panel's request for information, although revocation would reduce the extent of land subject to formal protection during mine operations, the retained covenant area and proposed new covenant over all ecological rehabilitation and enhancement areas (including Mine Regeneration Zones) would continue to protect the broader landform and vegetation pattern of the Bendigo landscape, with rehabilitation within the disturbed footprint to expand following mining alongside an extensive ecological offsetting and compensation measures. Refer to the statement of planning evidence prepared by Mark Chrisp in response to comments for further details on the proposed new covenanted area and the values that will be protected.

61. Landscape outcomes also include reinstating public access through Thomsons Saddle and along Rise and Shine Creek as close as practicable to the existing alignment of Thomsons Gorge Road, while maintaining opportunities to experience both the existing historic mining fabric and the evidence of more recent mining activity as part of the layered Bendigo landscape. While substantial adverse effects within part of the Rise and Shine Creek catchment is inevitable under the proposed mining application, I do not consider that outcome amounts to a loss of the Covenant's wider landscape values overall.

Sustainable Tarras

62. The comments from Sustainable Tarras include expert landscape evidence from Bridget Gilbert as well as lighting evidence from Dr Brian Boyle to which I respond. Submissions provided by Bev Batchelar and Suze Keith relating to landscape effects have also been addressed.

Bridget Gilbert (Registered Landscape Architect)

63. In responding to Ms Gilbert's review, I consider it important to begin by identifying the matters on which we are not materially apart. Ms Gilbert confirms that she has applied the same TTaTM framework and seven-point scale and agrees with the inferred extent of the relevant landscape addressed in the Assessment. Visual simulations are also generally considered to align with landscape assessment best practice, and she also generally concurs with findings in terms of natural character.

64. The principal disagreement is therefore not whether the proposal gives rise to adverse landscape effects. That is accepted, including recognition that the scale of proposed mining activity in this specific landscape context will inevitably result in some significant adverse effects. The real issue is whether those effects, when properly assessed at the scale of the broader receiving environment, remain sufficiently contained within the Shepherds Creek and Rise and Shine Creek valleys so as not to materially undermine the specific reasons why the Dunstan Mountains ONL are considered special or important. When assessed at the appropriate landscape scale, I consider the overall adverse effects are moderate adverse and material during start-up and mining operations and will reduce to low-moderate adverse at closure following a programme facilitating successful rehabilitation, explicitly because the broader natural, open and coherent character of the mountain backdrop and skyline is largely retained.

65. While Ms Gilbert does not materially dispute the inferred spatial extent of the relevant landscape addressed in the Assessment, her disagreement appears to arise principally through more explicit and specific evaluation across relevant physical, perceptual and associative landscape values. In my opinion, that difference does not of itself indicate a methodological deficiency applied in the Assessment, because the proper task remains to reach an integrated judgement as to how those dimensions interact in the specific landscape and the project's consequent views to inform the overall assessment of effects.

66. To that end, Ms Gilbert is critical of the structure of my assessment, including the treatment of landscape effects before visual effects and the progression from site-scale assessment to broader landscape-unit assessment. I do not accept that those matters disclose a substantive methodological flaw. The Assessment expressly records that the proposal was assessed in its specific landscape context and character, visual catchment, and natural character context. In other words, the assessment has not been confined to project components in isolation but moves from the local expression of effects to the broader receiving landscape in a conventional and, in my opinion, defensible way. As Ms Gilbert herself acknowledges, it is ultimately the effects analysis and conclusions that matter to decision-makers.

67. Related to that, I do not agree with Ms Gilbert's characterisation that the report relies on site-scale assessment to the exclusion of the relevant landscape. The Assessment identifies the Site as the area within which direct physical modification and consequent landscape effects will occur, but also separately assesses the proposal against the broader Dunstan Mountains ONL and its values. Indeed, Ms Gilbert's own review accepts that physical effects are reduced at the relevant landscape scale by what she terms the "moderating influence of scale," even though she applies a higher rating than I do. This recognises that the proposal's direct disturbance footprint and the wider ONL are not the same thing, and that scale and containment remain relevant.

68. I do not accept that the Assessment omitted the key landscape values against which the proposal should be judged. It identifies the Site within the Dunstan Mountains ONL; a highly expressive landscape shaped by tectonic, glacial and fluvial processes, with a coherent mountain backdrop, open skyline, schist tors, incised creek systems, a high sense of naturalness (despite historic mining and ongoing pastoral modification), and associative values relating to gold mining history, recreation and farming. It also identifies Battery Hill as a local and legible feature on the Dunstan Mountains skyline and recognises the Rise and Shine Creek valley as having historic gold mining and connections with mana whenua in terms of travel routes, and mahainga kai. While Ms Gilbert places greater emphasis on additional perceptual and associative matters, I consider those to be matters of elaboration rather than omission of the principal landscape values identified in the Assessment.

69. In relation to visual effects, Ms Gilbert's review again contains points of agreement that, in my opinion, moderate the force of her ultimate conclusion. She accepts that the visual simulations generally align with best practice, although she considers that they flatten perspective and underplay the legibility of landform grain which results in the proposed development looking further away from the vantage point that the outlook experience in real life. For completeness, I note that the simulation sheets record a horizontal field of view of 40 degrees, a vertical field of view of 25 degrees. This is equivalent of the extent of the surrounding landscape and project visible when the simulation is printed on an A3 sheet and held at a reading distance of 50 cm. They do not convey a 'real-life view' as experienced by humans emersed within a landscape. The simulation sheets also make clear that staging and progressive rehabilitation were not shown.

70. The visual simulations are best understood as representative aids rather than as fixed determinants of effect. The relevant issue is not confined to what is shown from a series of selected static viewpoints, but how the proposal would actually be experienced by viewing audiences in the landscape, including residents, people moving through the area along roads, tracks and other public places, and doing so

under differing light, weather and seasonal conditions. That approach is consistent with the recognised limitations of visual simulations, including their static nature, restricted field of view and tendency to flatten perspective, and with the broader point that landscape is typically experienced as a sequence of views rather than a single frozen image. In that context, I remain of the view that the visual material provides an appropriate evidential basis when read together with field observation, that the main visual impacts remain of localised and are not consistent with loss of most key characteristics or complete and total landscape-wide dominance typically commensurate with high and very high landscape and visual effects.

71. Read in that way, the visual evidence shows a graduated pattern of effect across different audience groups. The greatest potential effects are experienced by elevated and relatively proximate private audiences (>3 km), particularly from dwellings on Bendigo Terrace accessed from Ardgour Road, and typically views over greater distances where orientation allows more direct views into the Shepherds Creek and Rise and Shine Creek valleys (~9 km). Broader public views from roads and state highways are generally experienced in motion and are often oblique. Equivalent views from public roads closer to the Site are more commonly truncated by the foothills and intervening topography west of the Site. A similar distinction applies to conservation and recreational audiences, for whom views are largely concealed by landform and vegetation or otherwise available over substantial distances, such that the assessed effects are generally more limited with some moderate effects. Taken together, these matters do not, in my opinion, support a finding of major modification or loss of most of the key elements, features, and characteristics of the relevant landscape, such as would be consistent with high adverse landscape effects. Importantly, even Ms Gilbert's visual amenity assessment proceeds by reference to the same representative viewpoints relied on in the Assessment. In my opinion, the real difference between us is therefore not the visual evidence base itself, but the evaluative weight she gives to it.

72. Ms Gilbert's most substantial criticism concerns rehabilitation and the degree of confidence that can be placed on it. In my opinion, the realistic expectation is not that rehabilitation will recreate a pre-mining landscape quickly, completely, or without uncertainty. The LERMP itself recognises the constraints of this dry Central Otago environment, including drought, cold, fire risk, browsing pressure, and the fact that there is no single historic "pre-degradation" state to which the Site can simply be returned. It also acknowledges that some ecosystems, particularly cushionfields and spring annual herb communities, are technically difficult and require research, trials, and refinement before reliable rehabilitation methods are established. In that context, my assessment does not bluntly assume full rehabilitation success. Rather, it proceeds on the more realistic basis that the project can achieve stable and increasingly naturalised landforms that reduce the visibility

and legibility of mine features over time, and establish a credible long-term trajectory toward native-dominated landscape and ecological recovery.

73. That is reinforced by the structure of the mitigation and closure strategy set out in the LERMP, which is expressly staged, contingent, monitored, and adaptive. The proposal delays mining of the Come-in-Time Pit until at least year 6 unless rehabilitation and translocation techniques have first been successfully developed; requires the Western ELF to be naturalised; provides for progressive rehabilitation through the enrichment and thickening of grey scrubland and tussock areas within the Mine Regeneration Zone; and maintains the visibility and integrity of B10D as the most prominent landform in the Site along the skyline. More broadly, the proposed conditions include hold points, annual monitoring, success criteria, and adaptive management so that methods can be adjusted in response to actual results rather than assumed outcomes. In my opinion, that means rehabilitation is not being relied on as a speculative end-state, but as an active and managed process directed to achieving the level of landform integration and ecological recovery that can realistically be expected in this environment.

74. The same point arises in relation to Ardgour Rise. Ms Gilbert says the route will be visible from many viewpoints and therefore represents marked landscape change, but she also accepts that, if it is formed as a similarly scaled single-lane gravel route, remains unlit, and is subject to appropriate slope and restoration conditions, its visual effects will in time be acceptable. That is broadly consistent with the way the route is treated in the Assessment, which describes it as a new 4WD track created to enable access in place of Thomsons Gorge Road and records that the former road surface remains to be repurposed at closure for recreation.

75. Overall, I consider Ms Gilbert's evidence useful in highlighting the parts of the proposal that require careful scrutiny, particularly the magnitude of local operational effects and the need for realism about rehabilitation timeframes. Where I disagree with her is in the step from those legitimate cautions to the conclusion that the proposal effectively cuts an unacceptable industrial swathe through the Dunstan Mountains such that the affected catchments would cease to qualify as part of an ONL or high adverse effects when considered at the relevant landscape scale. In my opinion, that overstates the extent to which the landscape including the broader ONL is compromised. While the proposal will result in appreciable and, in places, high and significant adverse effects during mine operations, for reasons set out in the Assessment, that those effects remain relatively contained within modified valley systems and do not fundamentally displace the wider identity, legibility, openness and coherence of the broader Dunstan Mountains backdrop.

Dr Brian Boyle

76. I have reviewed the statement of Dr Brian Boyle dated 25 March 2026 alongside B.31 Cosgroves Limited – Exterior Lighting Report (Cosgroves, 2025) prepared for the Project. Dr Boyle's evidence is directed to the brightness of the night sky and the implications of artificial light for dark-sky values, including auroral visibility. In that respect, I accept and concur that exterior lighting associated with this large-scale operational mine has the potential to introduce night-time visual change within an otherwise dark rural environment.

77. In response, I consider the actual night-time lighting effects which generate adverse effects are capable of being materially constrained through design, staging and operational management. In particular, I note the fixed lit aspects of the project, including the Process Plant have purposely been sited in the folded landform of Shepherds Creek to limit potential night-time lighting effects form beyond the Site. B.31 Cosgroves Limited – Exterior Lighting Report (Cosgroves, 2025) concludes that compliance with the Central Otago District Plan spill-light limits can be achieved through proposed conditions and identifies a suite of mitigation measures directed specifically to reducing horizontal and vertical spill, sky glow and distant observer glare. These include the use of luminaires with zero upward waste light ratio, avoiding illumination of broad light-coloured surfaces that could increase reflected glow, directing fixed and mobile lighting inward toward active work areas, limiting mobile lighting to active operational areas only, and ensuring that non-operational areas such as the Ardgour Terraces are not generally lit overnight and instead rely on motion sensors where needed for health and safety.

78. I also note that the lighting design is intended to be further refined through detailed modelling in accordance with AS/NZS 4282:2023, including computer-based assessment of obtrusive light effects and finalisation of light fitting specifications, locations and installation details. While that detailed work sits outside my specialist expertise, it is relevant to my evidence that the Project includes a credible pathway for reducing obtrusive lighting effects as far as reasonably practicable. In my opinion, that supports the conclusion that night-time lighting effects can be managed in a way that does not elevate the Project's landscape and visual effects beyond those already identified in my assessment.

79. I therefore do not consider that the addition of night-time lighting warrants any increase to the overall landscape effects ratings assigned to the Project. Transient lighting may intensify the visual presence of some mine components during hours of darkness, particularly during active operational periods, but it remains an ancillary effect of elements that have already been assessed in terms of their visibility, extent and relationship to the wider landscape. Subject to the lighting controls and design measures described in the Cosgroves report, I consider that any adverse night-time

lighting effects can be appropriately managed and, in landscape and visual terms, would be no greater than the adverse visual effects already identified for the Project.

Bev Batchelar

80. I have reviewed the Submission of Ms Batchelar and acknowledge her reference to the Tarras Community Plan including the aspirations it records for rural character, dark skies, open space and community identity. Those matters are relevant context. However, they do not, in themselves, establish that the proposal is fundamentally inconsistent with the landscape values of the wider area or that the landscape effects are as extensive as asserted. The assessment must still turn on the actual nature, scale, extent and visibility of the proposed change.

Suze Keith

81. Similarly, I acknowledge Ms Keith's evocative description of the Tarras landscape and the deep sense of connection to place expressed in her account of its wide skies, changing light, dark night environment and river settings. Her submission helpfully conveys, in personal terms, qualities of the landscape that are clearly valued and which are relevant to its perceptual and associative values. However, those broader experiential qualities do not, of themselves, establish effects across the wider landscape to the extent implied. The assessment must still turn on the actual location, scale, extent and visibility of the proposed change, which in my view remains more localised than Ms Keith's submission suggests.

Environmental Defence Society

Elizabeth Anne Steven (Registered Landscape Architect)

82. Ms Steven's has been engaged by the Environmental Defence Society to independently review landscape matters related to the BOGP. The scope of Ms Steven's evidence specifically focuses on seeking to identify information gaps and inconsistencies in the Assessment and highlighting areas of disagreement. The issues raised in Ms Steven's review collectively allege that the Assessment is incomplete because it adopts an unduly narrow landscape context, omits relevant heritage, ecology and planning material, and fails to identify a sufficiently broad range of viewing locations and audiences. On that basis, it then asserts that the proposal's adverse effects on the Dunstan Mountains ONL, overall landscape character, visual amenity, backcountry experience, the Bendigo Terrace Significant Amenity Landscape, and the natural character of rivers and wetlands have been materially understated, and that the proposal is therefore contrary to the protective direction of some of the matters of national importance in section 6 of the RMA.

83. Ms Steven's accepts that the Assessment methodology is generally in accordance with good practice as referred to in TTaTM. Through this, landscape assessment

necessarily involves professional judgement as to the context and scale which is most relevant to the effects being assessed. In this case, the fact that additional contextual material can be described does not mean that the assessment failed to identify the matters that materially drive the actual landscape and visual effects of the proposal. I also do not accept that the Assessment lacked a sufficient understanding of the landscape and its values, including the Dunstan Mountains ONL and broader Central Otago Landscape in which potential landscape and visual effects have been assessed.

84. Where adverse effects have been identified, a key criticism advanced by Ms Steven's is essentially that the landscape evidence should have reproduced or synthesised more of the separate ecology, heritage and recreation material. Those disciplines are plainly relevant, and I accept they inform landscape judgment. However, a landscape assessment is not deficient merely because it does not restate in detail every matter addressed in other technical reports. The relevant question is whether the principal site attributes, values and sensitivities were identified to a degree sufficient to support a reasoned effects assessment.

85. Similarly, I do not accept that the visual assessment is undermined because not every conceivable viewing location or audience was separately assessed. Ms Steven identifies additional public easements, conservation areas, river margins and places within the Site as relevant viewpoints. In reviewing these viewing areas, I acknowledge that additional views maybe available but do not consider this is consistent with a potential omission of material visual effects. In my opinion the range of available views are not uniform in either character or consequence, ranging from limited or filtered views through to more open views from a small number of elevated locations or moving along the river corridor. While I agree including further detail may assist in illustrating the range of public experience, the existence of additional viewpoints does not alter the overall findings. Equally, Ms Steven also accepts that the Assessment's visibility analysis captures the full range of relevant viewpoints. In my opinion this ensures the principal patterns of visibility, the most representative public audiences, and the locations from which effects are greatest have been adequately assessed. The additional locations identified do not materially change the broad visual conclusions, although they may add granularity at the margins.

86. As to the Dunstan Mountains ONL, I do not agree that the proposal results in such substantial change that the affected part of the Dunstan Mountains ONL would fail to maintain their outstanding landscape character during operations, or that its outstanding qualification could only be regained if revegetation is fully successful decades later. The more appropriate conclusion, in my view, is that the proposal gives rise to localised and in some cases significant adverse effects within the Rise

and Shine and Shepherds Creek valleys in the Project Site, envelope and its immediate surrounds, but not to the extent that the wider ONL loses its defining character, coherence or legibility. The operative question is not whether there is obvious change, but whether that change is of such a scale and extent that the broader outstanding landscape ceases to protect the specific reasons why this place is considered special or important.

87. I accept that the proposal will introduce substantial and for some people overwhelming change, and that there will be consequent high and significant adverse effects within the Site on visual coherence, intactness and legibility. I also accept that some heritage elements and indigenous vegetation values within the Project Site will be affected. However, I do not agree that these matters justify a conclusion that overall landscape character effects are necessarily significant across the broader receiving environment, or that mining activity and post-closure conditions remain dominated by discordant landforms in the broader landscape. Such a conclusion gives insufficient weight to the contained geography of the proposal or the much larger landscape framework within which it sits including the specific reasons Dunstan Mountains are considered special or important.

88. The same applies to visual amenity, dark sky, quietness, tranquillity and backcountry experience. I accept that these are relevant landscape attributes and that, from some locations visual effects will be material and more than minor. However, those effects are not uniform across the receiving environment, and I do not consider the mere presence of views to be automatically discordant and significant. Nor do I agree that operation and post-closure visual effects should be characterised in blanket terms, including by reference to the most affected locations alone. I therefore disagree there is potential for lasting high adverse effect on the landscape described as the Bendigo-Tarras basin.

89. In relation to natural character, I accept that the proposal will adversely affect the natural character of streams, wetlands and their margins within the operational footprint. However, from a landscape perspective those effects are more localised than the broader ONL and overall landscape character issues. When read properly alongside the ecology evidence these represent adverse effects on existing already modified wetlands and watercourses and does not translate into a conclusion of very high adverse effects.

90. For those reasons, I do not agree that the asserted information gaps or the identified adverse effects lead to the conclusion that the outstanding nature landscape of the Dunstan Mountains would not be maintained. I consider the relevant landscape, including their statutory context, and natural character values have been sufficiently identified, and the effects have been properly understood. In my opinion, the

Assessment provides a sufficient basis for that judgment, and the criticisms advanced overstate both the extent of any information gap and the scale of the resulting effects.

Rhys James Girvan

17 April 2026

APPENDIX A: Landscape Evidence of Rhys James Girvan

APPENDIX A: Landscape Evidence of Rhys James Girvan

Table 1: Landscape Effects

Significant Effects (High/Very High)	BML			CODC (Stephen Brown)				ORC (Nigel Parker)			EDS (Anne Steven)			Sustainable Tarras (Bridget Gilbert)				Kai Tahu (Alayna Rā)			Owners and occupiers of adjacent land (Peter Rough)			Owners and occupiers of adjacent land (Di Lucas)		
	Level + Nature of Effect			Level + Nature of Effect				Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect Rehabilitation planting 1 = successful 2 = unsuccessful				Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect		
	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)		Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)		Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)
Site Scale Landscape Effects	Low Moderate to High Adverse[1]	Low to High Adverse[2]	Neutral to High Adverse[3]	Biophysical	Moderate-high[4]			Not stated	High[5]	Not stated	Very High[6]				Not stated	Significant[7]	Not stated	Substantial modification[8]			High adverse[9]			High adverse [10]		
Broad Landscape Scale Effects *(Dunstan Mountains ONL)*	Moderate Adverse [11]	Moderate Adverse[12]	Low-Moderate Adverse[13]	Significant[14]				Moderate adverse[15]	Moderate adverse[16]	Low Moderate adverse[17]	Moderate to High with two Very High adverse effects (relating to loss of historic heritage per se and the uplift of the Bendigo RAS covenant)[18]			Physical	Moderate adverse[19]	Very High adverse (Modification) [20]	1 - High adverse [21]	High adverse[22]			Significant adverse[23]			High adverse (including visual)[24]		
																	2 – Very High adverse (Modification) [25]									
															Low adverse (Moderating influence of scale)[26]	Moderate High (Moderating influence of scale)[27]	1 - Moderate adverse[28]									
																	2 - Moderate-High adverse (Moderating influence of scale)[29]									
														Perceptual	Moderate adverse[30]	High to Very High adverse[31]	1 - Moderate adverse 2 - Moderate-High adverse [32]									
														Associative	Moderate adverse [33]	High to Very High adverse [34]	1 - High adverse 2 - Very-High adverse [35]									

Table 2: Visual Effects[1]

Significant Effects (High/Very High)	BML			CODC (Stephen Brown)			ORC (Nigel Parker)			EDS (Anne Steven)			Sustainable Tarras (Bridget Gilbert)		
	Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect Rehabilitation planting 1 = successful 2 = unsuccessful		
Visual Effects	**Startup (Year 0 - 3)**	**Mining activity (Year 3-11)**	**Closure (Year 11-30)**	**Startup (Year 0 - 3)**	**Mining activity (Year 3-11)**	**Closure (Year 11-30)**	**Startup (Year 0 - 3)**	**Mining activity (Year 3-11)**	**Closure (Year 11-30)**	**Startup (Year 0 - 3)**	**Mining activity (Year 3-11)**	**Closure (Year 11-30)**	**Startup (Year 0 - 3)**	**Mining activity (Year 3-11)**	**Closure (Year 11-30)**
VS1: Thomson Gorge Road	Very Low adverse (Residential + private viewpoints)[36] Low Moderate adverse (Thomson Gorge Road)[37]	Low Moderate adverse (Residential + private viewpoints)[38] Moderate adverse (Thomson Gorge Road)[39]	Low adverse (Residential + private viewpoints)[40] Neutral (Thomson Gorge Road)[41]	Low adverse [42]	Low Moderate adverse[43]	Low adverse[44]	Very Low adverse (Residential + private viewpoints)[45] Low Moderate adverse (Thomson Gorge Road)[46]	Low Moderate adverse (Residential + private viewpoints)[47] Moderate adverse (Thomson Gorge Road)[48]	Low adverse (Residential + private viewpoints)[49] Neutral (Thomson Gorge Road)[50]	Very High[51]			Low adverse[52]	Moderate-High adverse	1 - Moderate adverse 2 -Moderate-High adverse
VS2: Ardgour Road, Lindis Crossing	Moderate adverse (Residential + private viewpoints)[53]	Moderate-High adverse (Residential + private viewpoints)[54]	Low- moderate adverse (Residential + private viewpoints)[55]	Moderate adverse[56]	High adverse[57]	Moderate adverse[58]	Moderate adverse (Residential + private viewpoints)[59]	Moderate-High adverse (Residential + private viewpoints)[60]	Low- moderate adverse (Residential + private viewpoints)[61]	Moderate-High[62]			Low adverse	High adverse	1 - Moderate-High adverse 2 – High adverse
VS3: Māori Point Road	Low Moderate adverse (Local Roads near Lindis Crossing)[63]	Moderate adverse (Local Roads near Lindis Crossing)[64]	Low adverse (Local Roads near Lindis Crossing)[65]	Moderate High adverse[66]	High adverse[67]	Moderate adverse[68]	Low Moderate adverse (Local Roads near Lindis Crossing)[69]	Moderate adverse (Local Roads near Lindis Crossing)[70]	Low adverse (Local Roads near Lindis Crossing)[71]	Moderate-High to High[72]			Low adverse	High adverse	1 - Moderate-High adverse 2 – High adverse
VS4: Ardgour Road, Tarras	Low Moderate adverse (Residential + private viewpoints)[73]	Moderate adverse (Residential + private viewpoints)[74]	Low Moderate adverse (Residential + private viewpoints)[75]	Low adverse[76]	Low adverse[77]	Low adverse[78]	Low Moderate adverse (Residential + private viewpoints)[79]	Moderate adverse (Residential + private viewpoints)[80]	Low Moderate adverse (Residential + private viewpoints)[81]	Moderate-High[82]			Low adverse	Low-Moderate adverse	Low adverse
VS5: Jolly Road	Low Moderate adverse (Residential + private viewpoints)[83]	Moderate adverse (Residential + private viewpoints)[84]	Low Moderate adverse (Residential + private viewpoints)[85]	Low Moderate adverse[86]	Moderate adverse[87]	Low Moderate adverse[88]	Low Moderate adverse (Residential + private viewpoints)[89]	Moderate adverse (Residential + private viewpoints)[90]	Low Moderate adverse (Residential + private viewpoints)[91]	Moderate-High[92]			Low-Moderate adverse	Moderate adverse	1 - Low-Moderate adverse 2 - Moderate adverse
VS6: State Highway 8A	Low Moderate adverse (State Highway 8A)[93]	Moderate adverse (State Highway 8A)[94]	Low adverse (State Highway 8A)[95]	Moderate adverse[96]	Moderate High adverse[97]	Moderate adverse[98]	Low Moderate adverse (State Highway 8A)[99]	Moderate adverse (State Highway 8A)[100]	Low adverse (State Highway 8A)[101]	Moderate-High[102]			Low-Moderate adverse	Moderate-High adverse	1 - Moderate adverse 2 - Moderate-High adverse
VS7: Pukekowhai Drive, Queensbury	Low adverse (Residential + private viewpoints)[103] Low Moderate adverse (local roads)[104]	Low adverse (Residential + private viewpoints)[105] Moderate adverse (local roads)[106]	Very Low adverse (Residential + private viewpoints)[107] Low adverse (local roads)[108]	Moderate adverse[109]	High adverse[110]	Moderate adverse[111]	Low adverse (Residential + private viewpoints) [112] Low Moderate adverse (local roads) [113]	Low adverse (Residential + private viewpoints) [114] Moderate adverse (local roads) [115]	Very Low adverse (Residential + private viewpoints) [116] Low adverse (local roads) [117]	Low[118]			Low-Moderate adverse	Moderate-High adverse	1 - Moderate adverse 2 - Moderate-High adverse
VS8: State Highway 6	Low Moderate adverse (State Highway 6)[119]	Moderate adverse (State Highway 6)[120]	Low adverse (State Highway 6)[121]	Moderate High adverse[122]	High to Very High adverse[123]	Moderate High adverse[124]	Low Moderate adverse (State Highway 6) [125]	Moderate adverse (State Highway 6) [126]	Low adverse (State Highway 6) [127]	Moderate-High to High[128]			Low-Moderate adverse	High to Very High adverse	1 - Moderate-High 2 - High adverse
VS9: State Highway 8, Bendigo	Low adverse (Residential + private viewpoints)[129] Low Moderate adverse (State Highway 8)[130]	Low Moderate adverse (Residential + private viewpoints)[131] Moderate adverse (State Highway 8)[132]	Low adverse (Residential + private viewpoints)[133] Low adverse (State Highway 8)[134]	Low Moderate adverse[135]	Moderate High adverse[136]	Low Moderate adverse[137]	Low adverse (Residential + private viewpoints) Low Moderate adverse (State Highway 8) [138]	Low Moderate adverse (Residential + private viewpoints) Moderate adverse (State Highway 8) [139]	Low adverse (Residential + private viewpoints) Low adverse (State Highway 8) [140]	Low to Moderate-High[141]			Low-Moderate adverse	Moderate-High adverse	1 - Moderate adverse 2 - Moderate-High adverse
VS10: Mount Pisa Road	Low Moderate to Moderate adverse (Residential + private viewpoints)[142] Low Moderate adverse (local roads)[143]	Moderate adverse (Residential + private viewpoints)[144] Moderate adverse (local roads)[145]	Low adverse (Residential + private viewpoints)[146] Low adverse (local roads)[147]	Low adverse[148]	Low Moderate adverse[149]	Low adverse[150]	Low Moderate to Moderate adverse (Residential + private viewpoints) [151] Low Moderate adverse (local roads) [152]	Moderate adverse (Residential + private viewpoints) [153] Moderate adverse (local roads) [154]	Low adverse (Residential + private viewpoints) [155] Low adverse (local roads) [156]	Moderate-High[157]			Low adverse	Low-Moderate to Moderate adverse	1 - Low adverse 2 - Low-Moderate to Moderate adverse

[1] Where quantified separately in evidence.

Table 3: Natural Character Effects																	
Significant Effects (High/Very High)	**BML**			**CODC (Stephen Brown)**			**ORC (Nigel Parker)**			**EDS (Anne Steven)**			**Sustainable Tarras (Bridget Gilbert)**			**Kai Tahu (Alayna Rā)**		
	Level + Nature of Effect			**Level + Nature of Effect**			**Level + Nature of Effect**			**Level + Nature of Effect**			**Level + Nature of Effect**			**Level + Nature of Effect**		
	Startup (Year 0 - 3)	**Mining activity (Year 3-11)**	**Closure (Year 11-30)**	**Startup (Year 0 - 3)**	**Mining activity (Year 3-11)**	**Closure (Year 11-30)**	**Startup (Year 0 - 3)**	**Mining activity (Year 3-11)**	**Closure (Year 11-30)**	**Startup (Year 0 - 3)**	**Mining activity (Year 3-11)**	**Closure (Year 11-30)**	**Startup (Year 0 - 3)**	**Mining activity (Year 3-11)**	**Closure (Year 11-30)**	**Startup (Year 0 - 3)**	**Mining activity (Year 3-11)**	**Closure (Year 11-30)**
Shepherds Creek	Moderate High adverse[158]	Moderate High adverse[159]	Moderate adverse[160]	Moderate High adverse[161]	Moderate High adverse[162]	Moderate adverse[163]	Moderate High adverse[164]	Moderate High adverse[165]	Moderate adverse[166]		Very High adverse[167]	Low Moderate to Low[168]	Moderate High adverse[169]	Moderate High adverse[170]	Moderate adverse[171]	High adverse[172]		
Rise and Shine Creek	Neutral[173]	Moderate adverse[174]	Low Moderate adverse[175]	Neutral[176]	Moderate adverse[177]	Low Moderate adverse[178]	Neutral[179]	Moderate adverse[180]	Low Moderate adverse[181]		Very High adverse[182]	Low Moderate to Low[183]	Neutral [184]	Moderate adverse [185]	Low Moderate adverse[186]	High adverse[187]		

[1] Boffa Miskell LNCEA Part A, s6.5.5, Table 2
[2] Boffa Miskell LNCEA Part A, s6.5.5, Table 2
[3] Boffa Miskell LNCEA Part A, s6.5.5, Table 2
[4] Brown NZ Ltd Evidence, s4.3
[5] SLR Memorandum, Appendix 42, s3.2.2
[6] Evidence of Anne Steven, paragraph 127.
[7] BGLA Landscape Effects Review, paragraph 3.9
[8] Evidence of Dr Alayna Rā, paragraph 23
[9] Submission of Peter Rough, implied agreement in paragraph 27.
[10] Evidence of Diane Lucas, paragraph 45
[11] Boffa Miskell LNCEA Part A, s6.5.5, Table 2
[12] Boffa Miskell LNCEA Part A, s6.5.5, Table 2
[13] Boffa Miskell LNCEA Part A, s6.5.5, Table 2
[14] Brown NZ Ltd Evidence, s8
[15] SLR Memorandum, Appendix 42, s3.1.1
[16] SLR Memorandum, Appendix 42, s3.1.1
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