

## OVERVIEW STATEMENT OF PETER ROUGH

To the Panel for concerning the Bendigo-Ophir Gold Project (**BOGP**) and the Cromwell Hearing of Invited Parties, 29 April 2026

### Introduction

- 1 My full name is Peter Rough.
- 2 I hold diplomas in Horticulture and Landscape Architecture obtained, in 1969 and 1974 respectively, from Lincoln College (now Lincoln University). I am a Life Member of the New Zealand Institute of Landscape Architects Inc.
- 3 I am a semi-retired landscape architect and a consultant at Rough Milne Mitchell Limited (**RMM**). I was a director of the company from its inception in 2010 until April 2016. Prior to that, from 1982, I was director of Peter Rough Landscape Architects Limited. And over the 1974-1981 period I held positions at the Lands & Survey Department in Auckland, George Wimpey Limited in London, and Lincoln University.
- 4 While I have considerable experience in landscape design, site planning, and master planning, over the last 30 years I have concentrated on undertaking landscape and visual assessments on a wide range of projects including communication, marine farm, wind farm, hydro-electric power, subdivision, mine, and quarry projects.
- 5 I have prepared and presented evidence as an expert witness at council hearings and before the Environment Court, Boards of Inquiry, and Special Tribunals in New Zealand, and the Victorian Civil and Administration Tribunal in Australia. I have peer reviewed other landscape architects' landscape and visual assessment work on a range of projects including Trans-Tasman Resources' seabed mining proposal in the South Taranaki Bight, and Oceana Gold's activities at its Reefton and Macraes operations.
- 6 My wife (Lilian Cheryl Lucas) and I reside in Lyttelton but own a 3.4779 ha property located on Bendigo Loop Road at its junction with Blue Mines Road. We acquired the land in 1997. It was formerly part of Bendigo Station and was kept in my wife's family after her parents sold the station in 1979 having owned it for 33 years. For a period in the 1860s, our property was part of the former Town of Bendigo and was subdivided into 31 small lots. We understand that remnants of a small stone building on the property was a hotel during the township period. Our property lies near the north-western corner of Mineral Prospecting Permit No. 60311 held by Matakanui Gold Limited.
- 7 The expert part of my submission addressed two areas of concern, these being:
  - Landscape and visual effects during the construction and operational stages of the BOGP
  - Enduring (post-closure) landscape and visual effects of the BOGP

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

- 8 My overview statement concerning these phases of the project is: Although progressive rehabilitation would occur over time, the landscape would present a mosaic of active and partially rehabilitated areas, with the overall impression being one of an industrial landscape. In this context, the characterisation of effects as "moderate adverse" during the operational stages (in the Landscape, Natural Character and Visual Effects Assessment (Boffa Miskell 2025)), does not fully reflect the extent to which the project would temporarily establish an industrial landscape within an area identified as Outstanding Natural Landscape (**ONL**) in the Operative Central Otago District Plan,

where objectives and policies seek to avoid, remedy, or mitigate adverse effects on landscape values, and to protect the natural character, visual amenity, and coherence of such landscapes.

### **Enduring (post-closure) landscape and visual effects of the BOGP**

9 Enduring (post-closure) landscape and visual effects give rise to my principal concerns regarding the BOGP because following closure, while buildings, plant, and other overtly industrial elements would be removed, the resulting project area landscape would remain permanently modified in ways that are fundamentally different from its existing natural character. The principal landscape issue arising from the BOGP is the enduring nature of landform modification associated with:

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

#### Large open pits

10 While it is proposed that the Come in Time Pit will be backfilled following extraction, with the intention of achieving a landform that blends with the surrounding terrain, in the absence of backfilling, the remaining pits will constitute:

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

Such features represent significant adverse effects on landscape character.

#### Engineered landforms (EFLs)

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

12 The proposal does not demonstrate that ELF will replicate the scale, form, and coherence of the existing valley systems. Instead, they are likely to remain recognisably artificial features at a macro-landscape scale, notwithstanding any surface irregularity or revegetation. And while the Come in Time Pit is proposed to be backfilled and recontoured to integrate with the surrounding terrain that indicates that backfilling is both feasible and capable of delivering a more appropriate landscape outcome in certain locations. However, the application does not provide a clear or consistent set of criteria for why this approach is not applied more broadly across the site.

13 In particular:

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

14 The Shepherds Creek and Rise and Shine valleys have a distinctive landform pattern that will be fundamentally altered by the introduction of large-scale engineered landforms that do not reflect the underlying geomorphology. Even with successful revegetation the

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

#### Process-plant platform

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

#### Tailings Storage Facility (TSF)

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

### **Conclusions**

- 18 The Operative Central Otago District Plan has objectives and policies that seek to maintain the integrity of landform patterns and ensure that development is in harmony with the landscape. Similarly, the Proposed Central Otago District Plan (notably the Natural Environment chapter and the Outstanding Natural Landscapes provisions, including objectives and policies within the Natural Features and Landscapes chapter) adopts a stronger directive framework, seeking to protect ONLs from inappropriate subdivision, use and development, safeguard their biophysical landscape values, and maintain their naturalness, legibility, and aesthetic coherence.
- 19 In my opinion, the proposed mine closure outcomes would result in a permanently modified landscape that, while rehabilitated and revegetated, would remain fundamentally different from the existing natural character of the Dunstan Mountains Outstanding Natural Landscape. In particular, the creation of large open pits and large engineered landforms, the substantial engineered terrace to accommodate process plant, the retained tailings storage facility, modified valley forms, and reconfigured drainage systems would introduce geomorphological features that are anthropogenic in origin and not characteristic of the schist-derived landforms that underpin the ONL's identified values.
- 20 Although these features are intended to be stabilised and integrated through contouring and revegetation, their scale, form, and spatial arrangement will be enduring in the landscape, thereby diminishing the coherence, naturalness, and legibility of the underlying landform patterns. Consequently, the post-closure environment would represent a permanent transformation rather than a restoration of the landscape, with adverse effects on the integrity and experiential qualities of the ONL, particularly in terms of its perceived naturalness and the continuity of its landform systems. Such

effects are not readily consistent with the intent of either the Operative or Proposed District Plan provisions relating to Outstanding Natural Landscapes.

- 21 Considering the landscape effects that will arise from the BOGP it is my opinion that the project will not maintain the landscape values of the Bendigo Conservation Covenant area. And particularly, regarding stated outcomes for Thomsons Gorge, it is my opinion that the project will not maintain the gorge area in its present state, nor protect the landscape of the upper reaches of Rise and Shine Creek.
- 22 Finally, I consider that the BOGP raises broader issues of cumulative effects and precedent. The Central Otago District Plan recognises the need to protect Outstanding Natural Landscapes from incremental degradation over time. The acceptance of large-scale landform modification associated with extractive activity within an ONL, and which have enduring adverse landscape and visual effects, has the potential to establish a precedent that could, if repeated, erode the very values that underpin the ONL classification.

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

23 April 2026