WAYFINDER
Landscape Planning & Strategy

BULLER PLATEAUX CONTINUATION PROJECT
LANDSCAPE EFFECTS ASSESSMENT PEER REVIEW

[redacted]
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EXECUTIVE SUMMARY

1. This report provides an independent peer review of the Landscape Assessment Report (LAR) prepared by Rough Milne Mitchell Landscape Architects Limited for the Buller Plateaux Continuation Project for Bathurst Resources Limited. The purpose of this review is to evaluate whether the methodology, analysis, and conclusions of the LAR provide a reliable and decision-ready basis for understanding landscape effects under the Fast-track Approvals Act 2024.

2. This peer review has focused on matters that may affect the clarity, integration, or reliability of the LAR's conclusions. Accordingly, it gives greater attention to potential gaps or areas where further explanation would have been beneficial, and provides more limited comment on aspects of the LAR that are considered sufficiently detailed and reliable.

3. Overall, the LAR adopts a methodological framework that reflects consideration of the guidance of *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines*. It applies a logical structure based on a two-scale approach (Broad Scale and Project Scale), ecological timeframes, and the identification of Landscape Character Units. The assessment is supported by a substantial and generally appropriate information base, including ecological, heritage, recreational, planning, hydrological, and cultural inputs, including a Cultural Impact Assessment (CIA). This provides a credible foundation for describing the receiving environment and identifying landscape effects.

4. The LAR applies this methodology in a way that provides a useful basis for understanding the Project's landscape effects, although some aspects of the framework could be more clearly integrated through the assessment. The physical attributes of the landscape are well developed, while perceptual and associative dimensions would benefit from more explicit connection to the characterisation of landscape values and the evaluation of effects. Tangata whenua values are acknowledged through the CIA, but their relationship to the landscape assessment framework could be more clearly expressed. Similarly, the relevant statutory provisions are identified, although the assessment would be strengthened by showing more directly how specific objectives and policies have informed the evaluation of effects.

5. The LAR provides a sufficiently detailed and robust assessment of the Project's landscape effects. At the Broad Scale, effects are assessed as low due to four assumptions; the receiving environment is already modified, effects (changes to views) are primarily distant and visually diluted, the expansive scale of the landscape is able to absorb the visual change, and that the proposed rehabilitation successfully reinstates the visual character over time.

6. At the Project Scale, the Project will result in moderate to very high adverse landscape and visual effects during active mining. These effects arise primarily from large□scale landform modification, indigenous vegetation removal, changes to hydrological systems, and disruption to perceptual and associative qualities (such as heritage features). Effects on associative values, including heritage and recreation, are also identified where features are modified or access and experience are altered. They are anticipated to reduce to low to no effects in the medium-long term, which relies on three assumptions; the effects are temporary, rehabilitation is successful and that there is already mining-influenced character at the site.

7. The LAR identifies progressive rehabilitation as fundamental to managing long-term landscape outcomes. The proposed measures demonstrate that the post-mining landscape has the capacity to recover a degree of natural character, coherence, and ecological function over time. The mitigation framework is focused primarily on biophysical restoration, with less clarity provided on anticipated perceptual and associative outcomes or the intended post-mining landscape character. The conclusion that landscape and visual effects will reduce to low or negligible levels over the medium to long term is considered probable, but is dependent on successful implementation, realistic ecological recovery trajectories, and the extended timeframes required. These assumptions would have benefited from being more fully explained in the LAR.

8. In conclusion, the LAR provides a useful and broadly coherent basis for understanding the Project's landscape effects. It identifies the principal physical changes associated with the Project and provides a reasonable indication of likely landscape effects, particularly at the Project Scale during active mining.

9. In my opinion, some aspects of the assessment would have benefited from clearer integration and explanation, including the links between landscape

characterisation, identified values, and assessed effects, and the way cultural, perceptual, and associative dimensions are drawn through the assessment. Also in my opinion, the assessment would have been strengthened by more explicit supporting analysis in relation to broad-scale effects and the anticipated reduction of effects over time through rehabilitation. In particular, clearer explanation of the assumptions underpinning rehabilitation outcomes would have improved the robustness of the long-term effects conclusions.

10. However, these matters relate primarily to clarity, transparency, and depth of explanation rather than to the overall identification of the Project's likely landscape effects. While the LAR does not consistently present the same level of detail across all landscape dimensions and timeframes, I consider that it identifies and assesses the broad nature and scale of the Project's landscape effects sufficiently for decision-making under the Fast-track Approvals Act. The LAR therefore remains a credible foundation for decision-making when read alongside the supporting technical material.

INTRODUCTION

11. My full name is Shannon Bray. I am a director and NZILA Registered Fellow landscape architect at Wayfinder Planning & Strategy Ltd (Wayfinder).

12. This technical assessment addresses the landscape assessment report proposed for the Buller Plateaux Continuation Project (the Project) and provides an independent review of the landscape aspects of the Project.

Purpose and scope of review

13. The purpose of this peer review is to provide an independent review of and comment on:

    (a) The Landscape Assessment Report (LAR) prepared for Bathurst Resources Limited by Nikki Smetham, Technical Lead/Senior Landscape Architect, of Rough Milne Mitchell Landscape Architects Limited.

    (b) Provide the decision maker assistance in interpreting the process, considerations and findings of the LAR.

Qualifications and experience

14. I have the following qualifications and experience relevant to this assessment:

    (a) Bachelor of Landscape Architecture (with Honours) Lincoln University 1996, Bachelor of Forestry Science University of Canterbury 1994.

    (b) Registered Fellow Landscape Architect and past President of the New Zealand Institute of Landscape Architects Tuia Pito Ora (NZILA).

    (c) Since May 2016 I have been Director of Wayfinder, a specialist landscape architecture firm based in Hawke's Bay.

    (d) I specialise in landscape planning and assessment and have provided landscape and visual assessment reports on behalf of applicants and councils across a range of utility and infrastructure projects. This work has included:

        (i) Puke Coal, Huntly (consent for construction & operation of landfill and coal mine);

        (ii) Greenmount Landfill, Auckland (consent for extended operation)

(iii) Pinehill Landfill, Auckland (consent for reshaping as part of SH1 Northern Corridor works);

(iv) Redvale Landfill, Auckland (Peer review of consent for extended operation);

(v) Mangatāwhiri Coal Mine, Waikato (Council s42 for proposed coal mine);

(vi) Brookby Quarry, Auckland (Consent for extended operation);

(vii) Horokiwi Quarry, Wellington;

(viii) Russell Roads Quarry, Hastings; and

(ix) Hi Rock Quarry, Palmerston North.

15. This review has been prepared with the assistance of Ben Ormsby, a landscape architect at Wayfinder.

Code of conduct

16. I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. This assessment has been prepared in compliance with that Code, as if it were evidence being given in Environment Court proceedings. In particular, unless I state otherwise, this assessment is within my area of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

17. I confirm that this review has been undertaken independently.

Peer Review Methodology

18. My approach has been to consider all relevant Project reports necessary to develop an understanding of the likely landscape effects of the project (construction, operation and closure), consider whether the extent and nature of the effects have been correctly and fully assessed, documented and addressed, and determine whether the proposed management (including if applicable offset/compensation measures) appropriately address the impacts of the construction, operation and closure of the project. This includes the Buller Plateaux Landscape Study, Landscape Assessment Report, Graphic Attachment, LAR appendices, and specialised reports as required.

19. The methodology of this peer review follows the guidance of *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines* (*Te Tangi a te Manu*). It is an appraisal of the LAR and not a parallel assessment. It follows the principles set out in *Te Tangi a te Manu*, with a focus on:

(a) the methodology and application of methodology in the LAR;

(b) characterisation of existing landscape;

(c) clarity and detail of proposal description;

(d) identification and assessment against statutory provisions;

(e) identification and assessment of landscape effects;

(f) effectiveness of design (mitigation) response; and

(g) whether the LAR's conclusions are credible and consistent with the analysis.

20. I have also followed the Fast Track Practice and Procedure guidance for peer reviews (22 July 2025).

21. A site and locality visit was undertaken by myself and my colleague Mr Ormsby on 26 and 27 August 2025. This included visiting:

(a) A large portion of the current Bathurst mining operation at Stockton Mine by vehicle, including viewing key operational areas;

(b) the surrounding area on State Highway 67 to the north (as far as 20 Nikau Road/SH67) and south of the mine site (as far as Westport) by vehicle;

(c) the Denniston Plateau coal mining historic area via Denniston Road, and Burnetts Face Road by vehicle;

(d) the road to and summit of Mt Rochfort by vehicle; and

(e) the existing and proposed mining areas including Stockton Mine, Denniston plateau and Mt William summit via helicopter.

22. I met with Ms Smetham on 2 September 2025 in Christchurch to provide initial observations from the site visit, and to discuss how she intended to

undertake her assessment (including covering key effects to be considered).

23. A draft LAR was provided to me for comment, and I provided feedback directly to Ms Smetham on 3 November 2025. A further draft LAR, Graphic Attachment, and appendices were provided on 20 January 2026.

24. A final (draft) version of the LAR was provided to me on 16 June 2026. The LAR is by necessity a reasonably long and complicated document. As such, I have attempted to draw out the relevant matters and frame these in a succinct, legible manner. I then provide separate comment on whether I consider the LAR appropriately considers each of these matters and draws a credible conclusion.

25. In undertaking this review, I distinguish between matters that affect the reliability of the LAR's conclusions, and those that primarily affect the clarity, transparency, or completeness of the assessment. I have focussed on potential gaps rather than doing a full review of every detail of the LAR, and I provide limited comment on areas of the LAR that I consider are detailed enough.

26. This peer review is structured with three steps in analysis of each section:

    (a) Summary of the content in the LAR;

    (b) A review of that content providing commentary; and

    (c) A concluding statement about the content.

REVIEW: METHODOLOGY SECTION

Overall Methodology

Summary of LAR Content - Overall Methodology

27. The LAR states that its methodology and terminology are informed by *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines*, and is tailored to the specific project context and legislative frameworks (FTAA, RMA, Buller District Plan, Te Tai Poutini Plan).

28. The assessment draws on:

    (a) Desk-top research (planning documents, statutory instruments, historic datasets, aerial imagery, and technical reports including ecology, recreation and tourism, archaeology/heritage, Cultural Impact Assessment, and lighting).

    (b) Fieldwork, with site visits undertaken in 2021 (for the baseline Buller Plateaux Landscape Study) and again in March 2025 to confirm landscape character, values, visibility, and project understanding.

29. The LAR acknowledges that landscape forms a perceptual continuum but defines boundaries for assessment at two primary scales used for both landscape description and effects assessment:

    (a) Broad-Scale – covering the wider receiving environment from the coast (SH67 corridor) to surrounding ranges.

    (b) Project-Scale – the Denniston and Stockton Plateaux

30. Within the Project-scale, the effects assessment is undertaken for distinct project sub-areas (Stockton Extension, MFS, ESE and UWHR) (Section 7.4). The Project-scale description is further refined through Landscape Character Units (LCUs), which are applied to the Stockton Plateau (LCU 1–3) to differentiate landscape character and values within the receiving environment.

31. Informed by *Te Tangi a te Manu*, the LAR structures baseline descriptions and the effects assessment around three interrelated dimensions (Physical, Perceptual and Associative) that provide the framework for identifying landscape values and assessing effects.

32. The assessment applies the seven-point magnitude scale (Very Low to Very High) from *Te Tangi a te Manu*, aligned with RMA significance thresholds (Less than Minor to Significant). This scale is used for both landscape and visual effects.

33. Effects are evaluated over ecological timeframes aligned with the rehabilitation programme that reflects expected vegetation establishment and recovery trajectories:

    (a) Short term – 0–10 years after mine closure and post-rehabilitation

    (b) Medium term – 10–50 years continuing vegetation establishment and maturation

    (c) Long term – 50+ years

34. The methodology includes:

    (a) Representative public viewpoints at both Broad-Scale (e.g., SH67) and Project-Scale (e.g., Mt Rochfort, Whareatea Road, Myra's Track).

    (b) Visual Simulations prepared by Virtual View (Appendix C), illustrating effects through different mining and rehabilitation stages.

    (c) Consideration of distance, view angle, visibility, viewer type, movement, and viewing context.

35. The LAR defines the existing environment as including:

    (a) Historic activities still present or with existing use rights

    (b) Activities permitted by plans

    (c) Consented activities and their likely implementation

    (d) Existing rehabilitation/offset obligations under CMLs
    Cumulative effects are assessed in terms of simultaneous activity across the Stockton and Denniston Plateaux, excluding already-consented activities at Cypress and No. 2 South.

Peer Review Commentary - Overall Methodology

Overall approach

36. The methodology in Section 3 of the LAR is consistent with *Te Tangi a te Manu* in structure and approach, but reflects a generally standard application rather than a highly tailored methodology.

37. Although a methodology overview is provided, it is relatively high-level and focuses primarily on describing the methods used, rather than explaining the rationale for their use. In particular, the LAR provides limited explanation of:

    (a) why specific methods were selected;

    (b) how the methods were tailored to the particular characteristics of the Buller Plateaux and the nature of the project; and

    (c) the underlying basis for key methodological decisions, including the delineation of assessment scales, selection of landscape attributes, and interpretation of landscape values.

38. The cross-disciplinary use of ecological, historic heritage, and recreation information is appropriate given the nature of the landscape effects arising from the Project.

39. The methodology section identifies the relevant statutory and policy framework and acknowledges their role in the scope and focus of the assessment but provides limited explanation of how these have influenced the assessment approach. This weakens the link between policy considerations and assessment of effects.

Scale of analysis

40. In my opinion, one of the defining aspects of this Project is the interplay between the scale of the landscape context and the scale of the proposal itself. The LAR's definition of the Broad Scale is appropriate and in my opinion, reflects the realistic extent of potential visibility associated with a project of this size. Likewise, the Project Scale is sensibly framed around the coherent landscape formed by the two plateaux, acknowledging that the proposed mining activities are largely contained within this distinctive landform pattern. This provides a logical spatial structure for the assessment and aligns with good practice.

41. The repeated use of Broad Scale and Project Scale throughout the LAR demonstrates an understanding of one of the core principles of landscape assessment: that landscape values are scale-dependent because they arise from how and where landscapes are experienced. The two-scale framework allows landscape values to be identified where they meaningfully occur, and assessed coherently in that context. In my opinion, the consistent application of this scaling approach strengthens the internal logic of the assessment and provides a clear foundation for comparing and evaluating effects across different experiential settings.

42. The LAR provides detailed description at both the Broad and Project Scales. Its analysis of the wider district-scale landscape context is comparatively limited. Although the report identifies the Buller Plateaux within a broader setting that includes adjacent conservation areas, Outstanding Natural Landscapes, and the Paparoa Range and wider national park backdrop, it does not substantively examine the functional and perceptual relationships between these components. These larger-scale relationships are important in shaping regional landscape patterns, ecological connectivity, and sense of place, and therefore warrant more explicit consideration.

43. The further subdivision of the Project Scale into Landscape Character Units (LCUs) is referenced within the methodology section, however it is not clearly articulated as a defined component of the assessment framework. Their use provides a helpful level of detail and supports a more granular understanding of how the Project interacts with different parts of the plateaux.

Timeframes

44. I consider the second defining aspect of the Project to be the duration of activity and the longevity of resulting landscape change. The Project unfolds over an extended period, including initial disturbance, sequential extraction, rehabilitation, and long-term ecological recovery. Landscape effects evolve significantly over time, and the temporal dimension is as influential as spatial scale in determining how landscape values are affected.

45. In my opinion, the use of ecological timeframes (short, medium and long term) is logical and appropriate, given that vegetation establishment and landform integration depend on ecological processes. Understanding these

timeframes requires reference back to the Project Description (and to a lesser extent the GA) to determine which areas are disturbed at particular stages and how those disturbances are sequenced. Integration of these spatial–temporal relationships within the LAR itself, for example through summary tables or diagrams linked directly to the ecological timeframes, would have improved the transparency and usability of the assessment.

46. Staging and sequencing are identified as key aspects of the Project, but the assessment does not clearly articulate a structured method for evaluating landscape effects across different stages. In particular, there is limited explanation of how effects are consistently assessed and compared between undisturbed conditions, active extraction phases, and areas undergoing progressive or advanced rehabilitation. Clearer articulation of this approach is important to ensure that temporal effects are robustly and transparently evaluated.

47. Understanding these phases and their shifting spatial distribution is fundamental to evaluating how landscape values change over the life of the Project. At any given time, different parts of the plateaux will be at different stages, creating a dynamic mosaic of undisturbed, active, and rehabilitating areas. Without explicit analysis of how these phases interact spatially, the assessment risks under-representing the complexity and cumulative expression of landscape effects as they evolve.

Landscape dimensions

48. The three landscape dimensions are identified in the methodology. The dimensions are introduced as the primary structuring lens (consistent with *Te Tangi a te Manu*). However ,the LAR frequently departs from this framework, making it potentially difficult at times to trace how the stated methodology has been applied.

49. By way of example, the LAR refers to a range of physical attributes, including landform, land cover, land use, and ecological systems. These matters are appropriately relevant to the physical dimension of landscape, but they are not clearly defined or organised as analytical categories within the methodology. As a result, it is sometimes difficult to trace how these physical attributes are used to inform landscape character, landscape values, and the subsequent assessment of effects. This also makes the relationship between the physical dimension and the perceptual and associative dimensions less clear than it could be.

50. Despite this concern, the LAR does separately consider perceptual effects, with a particular focus on visual effects, and associative effects associated with historic mining heritage. Recreation and tourism features are also identified, but the LAR provides less explanation of how those features inform the assessment of associative landscape values and related effects.

Peer Review Conclusions – Overall Methodology

51. In my opinion, the methodology identifies most of the elements expected of a contemporary landscape assessment and provides a broadly appropriate framework.

52. The methodology set out in the LAR demonstrates several strengths consistent with good practice in landscape assessment. The adoption of a two-scale analytical framework (Broad Scale and Project Scale), the use of ecological timeframes, and the recognition of the project's reliance on multidisciplinary inputs all contribute meaningfully to structuring the assessment in a way that reflects the scale, complexity, and duration of the Project. These aspects support a generally coherent logic for describing the receiving environment and for organising the effects assessment.

53. A more explicit and rigorous articulation of how the chosen methods relate to *Te Tangi a te Manu*, how landscape dimensions structure the analysis, and how temporal and spatial aspects are consistently integrated could have strengthened the assessment and improved confidence in its conclusions. While a significant amount of work has gone into description and analysis of the project and its effects, some questions about effects remain and in my view this may have been avoided with a more structured methodological foundation.

Information Base

Summary of LAR Content - Information Base

54. The LAR draws extensively on the BPLS as its primary baseline for describing the existing landscape character and values of the Stockton and Denniston Plateaux. It integrates information from a suite of technical expert reports covering ecology, historic heritage and archaeology, cultural values, recreation and tourism, hydrology, and other disciplines.

55. The LAR identifies that it relies on information contained within ecological assessments and rehabilitation plans to understand and describe

post-mining landforms, the design of engineered landforms (ELFs), and the anticipated vegetation trajectories. These inputs underpin the LAR's assumptions about outcomes and long-term integration of mined areas into the receiving environment.

56. In addition to technical reports, the information base includes site visits undertaken in 2021 and 2025, historic datasets, aerial imagery, district-plan overlays, statutory documents, and existing mine records. These sources collectively inform the LAR's understanding of both the existing environment and the legal baseline, including historic and consented activities.

Peer Review Commentary - Information Base

Buller Plateaux Landscape Study (BPLS)

57. The BPLS was commissioned by Bathurst as a comprehensive baseline description of the Denniston and Stockton Plateaux and included an evaluation of their existing landscape values. A key purpose of the BPLS was to determine whether either plateau met the threshold for classification as an Outstanding Natural Feature or Outstanding Natural Landscape (ONF/ONL). It therefore provides a structured, pre-project landscape evidence base against which subsequent effects assessments, including the LAR, can be anchored.

58. As noted above, the BPLS has been used to inform both the landscape characterisation and the identification of landscape values in the LAR. In my opinion, the BPLS provides a logical and appropriate starting point for understanding the existing landscape context. Given this document was largely prepared by the author of the LAR, there is clear transferrable understanding from the BPLS into the LAR. As such, I consider the LAR makes appropriate use of the BPLS at the broad landscape scale and builds on its findings with more recent datasets and project-specific information.

59. Importantly, the LAR does not revisit or challenge the internal conclusions of the BPLS including disagreement between landscape architects about the Denniston Plateau ONF/ONL question. The LAR updates the baseline using new information supplied through specialist ecological, heritage, and recreational assessments. In my opinion, the incorporation of additional and updated information provides the level of specificity required for a project-focused effects assessment. In this respect, the LAR appropriately

uses the BPLS as a foundation but does not rely on it uncritically; it builds upon it with project-specific fieldwork, updated technical inputs, and a more nuanced value framework aligned with current landscape assessment guidelines.

60. In my opinion, this results in a more tailored and up to date evidential foundation for understanding existing landscape values of the plateaux and for evaluating the likely effects of the Project.

Bicultural Considerations

61. In the New Zealand context, tangata whenua and te ao Māori perspectives are integral to landscape understanding. The LAR does not explicitly incorporate these frameworks within its methodology. While this is not uncommon in practice, and the Cultural Impact Assessment (CIA) is appropriately relied upon to provide this perspective, *Te Tangi a te Manu* identifies integration of these dimensions as good practice within landscape assessment.

62. I understand from direct communication with Ms Smetham that this was a deliberate methodological choice, with cultural values identified through the CIA prepared by tangata whenua rather than being independently interpreted within the LAR. This approach appropriately recognises the role of tangata whenua in defining cultural values.

63. However, while the CIA is referenced and informs the description of associative values, its findings are largely incorporated as high-level background information. Tangata whenua relationships with the landscape are acknowledged, but these are not clearly translated into the landscape assessment framework or systematically applied in the identification of landscape values, sensitivity, or the evaluation of effects.

64. As a result, while the inclusion of the CIA provides an appropriate evidential base, the lack of clear integration into the assessment methodology limits transparency as to how cultural values have influenced the assessment of effects, and reduces confidence that these dimensions have been fully reflected in the overall evaluation of landscape effects.

Community Perspectives

65. In addition to the comments above regarding tangata whenua cultural values, the methodology does not identify whether community perspectives

were specifically sought in relation to landscape values or effects. The LAR states that it is based on the professional judgement and expert opinion of the author, and does not appear to rely on direct community consultation as a discrete input to the landscape assessment. That approach is not unusual for a technical landscape assessment, but it means the basis for understanding locally derived associative values is not made explicit within the LAR.

66. The LAR notes that consultation undertaken by others forms part of the wider application; however, this information is not explicitly incorporated into the landscape assessment itself. Similarly, the BPLS relies on professional landscape architect appraisal and acknowledges that expert assessments, particularly in relation to concepts such as naturalness, may differ from the knowledge and perceptions of local communities.

67. While it is reasonable to assume that community values are reflected to some degree in the statutory and policy framework that applies to the Project area, reliance on policy settings as a proxy for community views does not fully capture how people may experience or value the specific landscapes affected by this Project, particularly in relation to its scale, duration, and effects on places of local meaning.

68. The reliance on professional judgement is consistent with common practice; however, clearer explanation of how local experience, patterns of use, and community associations have been considered would have strengthened the associative assessment. This would have improved transparency as to how experiential and locally derived values have informed the evaluation of effects, without necessarily requiring a separate community consultation process within the LAR itself.

Visual Simulations

69. In my opinion, the emphasis placed on visual simulations within the LAR is not fully supported by the methodology. While the methodology identifies the use of viewpoints and visual simulations, it largely describes their inclusion rather than explaining how they have informed the analysis. It does not set out in detail the assumptions or parameters underpinning their preparation, nor how any limitations of the simulations have been accounted for. Given the scale and complexity of the Project, and the extent to which visual material is relied upon in the assessment of effects, this creates a degree of uncertainty about their role in shaping the findings.

70. A more robust methodology section would have clarified:

(a) the technical parameters used by Virtual View (such as camera height, lens characteristics, lighting conditions and rendering assumptions);

(b) how simulations were used to evaluate changes across different stages of mining and rehabilitation;

(c) how uncertainties or limitations in the modelling were recognised and managed; and

(d) how the simulations relate to the wider landscape effects framework, including the assessment of perceptual and associative values.

71. Without this explanation, the analytical weight placed on the visual material is largely inferred rather than explicitly defined. This reduces methodological clarity and makes it more difficult to evaluate the robustness of the visual effects conclusions.

Ecological information

72. The LAR draws on ecological findings from both the BPLS and the updated specialist ecological reports prepared for the Project. Together, these sources establish the wider ecological setting of the plateaux and provide current detail on vegetation types, habitats, wetlands, species distributions, and the likely pathways of ecological recovery. In my view, this ecological information is well integrated into the Landscape Character Units (LCUs). It effectively informs the identification of physical landscape attributes and supports the evaluation of landscape values by translating specialist ecological knowledge into a landscape-based interpretation.

73. In my opinion, this approach is consistent with *Te Tangi a te Manu*, which emphasises the need to understand ecological patterns as part of a landscape's physical substrate and to interpret those patterns through the lens of landscape character and value. The LAR's use of ecological information demonstrates this integration by connecting ecological attributes with broader landscape patterns, visual coherence, and experiential qualities. This strengthens the physical dimension of the assessment and provides an evidence-based foundation for evaluating both landscape effects and the likely outcomes.

Historic heritage information

74. While only described at a broad conceptual level in the methodology section, the LAR draws on a wide range of historic heritage information sources, including historic studies, archaeological surveys, district plan schedules, and the Clough & Associates Archaeological and Historic Heritage Report. These sources collectively provide detailed information on the presence, extent, and significance of mining-related features across the plateaux, including underground workings, rope roads, tramways, inclines, historic mine portals, and former settlement sites. In my opinion, this information base is used effectively to establish the historic heritage context of the landscape and to identify the features that contribute to the plateaux's distinctive heritage identity.

75. The LAR appropriately incorporates this material within the associative dimension of landscape character and values. It demonstrates how mining heritage, industrial archaeology, and DOC-managed historic sites contribute to sense of place, memory, and cultural meaning across both plateaux. The reliance on specialist heritage assessments, interpreted through a broader landscape lens, is generally consistent with the recognition of historic and cultural associations within *Te Tangi a te Manu*.

76. However, the linkage between this evidence base and the assessment of effects remains largely reliant on professional judgement. The methodology provides limited clarity as to how this information is systematically translated into the evaluation of landscape values and effects.

Recreation and tourism information

77. Although not detailed in the methodology section, the LAR draws extensively on the Recreation and Tourism Assessment, which provides empirical information on visitor use patterns, recreational behaviours, route preferences, and the popularity of walking, mountain biking, heritage exploration, and scenic viewing across the Denniston and Stockton Plateaux. In my opinion, this specialist report has been used effectively to expand the LAR's understanding of associative landscape values, particularly through identifying key recreational destinations. These features are consistently described as shaping public experience of the plateaux and therefore contribute to their associative and perceptual landscape significance. The methodology provides limited clarity on how this

information is systematically translated into the evaluation of landscape values and effects.

78. The LAR acknowledges the broader appeal of the plateaux as day-use recreation landscapes, supporting activities that range from short heritage walks to more challenging back-country routes. In my view, the LAR draws effectively on these findings when describing Project Scale landscape character and when evaluating potential effects on recreational amenity, particularly in relation to access restrictions, changes to experiential qualities, and alterations to the character of well-used routes during mining operations. This approach is generally consistent with the intent of *Te Tangi a te Manu* in recognising experiential and associative values. The assessment does not clearly articulate a structured methodology for translating recreation evidence into value thresholds or effects ratings, and remains reliant on professional judgement.

Peer Review Conclusions – Information Base

79. Taken together, the information base for the LAR comprises technical, historical, ecological and recreational material, anchored by the BPLS. The LAR draws on a wide and generally robust information base and makes effective use of ecological, heritage and recreational evidence. The treatment of cultural and community perspectives, and the limited transparency around how visual simulations and other specialist inputs are analytically applied within the assessment, constrains the completeness and clarity of the methodology. Strengthening these areas would have enhanced the LAR's alignment with *Te Tangi a te Manu* and supported a more holistic and fully contextualised evaluation of landscape effects.

Peer Review Conclusions – Methodology

80. Overall, the methodology described in the LAR outlines the core elements of the methodology guidance in *Te Tangi a te Manu*. It identifies key components such as desk-top research, site and locality visits, review of statutory plans, and the use of visual simulations, and it establishes foundational methodological structures including the use of two scales of analysis and three ecological derived timeframes. These elements collectively form the basis of a method that is recognisable, structured, and aligned with accepted professional practice.

81. As identified above, there are areas where the methodology lacks clarity. Having reviewed the full LAR and discussing the assessment approach with Ms Smetham, I am satisfied that the overall information base underpinning the assessment is sufficiently wide-ranging and appropriate for a landscape assessment of this scale. The depth of ecological, heritage, cultural, recreational, planning, and historic information provides a substantial evidential foundation from which to understand both the existing environment and the likely effects of the Project.

82. In my opinion, the LAR adopts a generally coherent and logical methodological structure. The progression from understanding the Project and its context, through description of the receiving environment, to the evaluation of effects and policy considerations is logical. The use of broad-scale and project-scale assessments, the incorporation of Landscape Character Units (LCUs), and the consistent effects rating scale all contribute to a method that is capable of delivering a reasoned and transparent assessment.

83. I consider the application of the methodology is not consistently carried through all parts of the assessment. This weakens the analytical link between the landscape values, the assessment of effects, and the subsequent policy analysis. In addition, the LAR does not always frame effects explicitly in relation to relevant statutory objectives and policies, reducing the clarity of the policy assessment. Greater integration of the landscape dimensions, the statutory framework, and landscape-relevant information would have enhanced the rigour, balance, and transparency of the assessment.

84. Overall, there are identifiable limitations relating to methodological clarity, integration of landscape dimensions, and articulation of statutory and cultural considerations. However, these do not materially alter the identification of landscape values or the assessment of effects. On that basis, I consider the LAR provides a reliable understanding of the Project's landscape effects and is fit for purpose for decision-making under the Fast-track Approvals Act, subject to the limitations identified in this review.

REVIEW: CONTEXT & PROPOSAL DESCRIPTION

Landscape Context

Summary of LAR Content - Landscape Context

85. The LAR uses several terms to describe the baseline against which the effects are assessed, including ‘existing environment’, ‘receiving environment’, and ‘current modified landscape’. Collectively, these terms establish a baseline that includes historic, permitted, and consented activities, recognising that the landscape is already modified by ongoing and past mining.

86. The existing environment is considered as a composite of multiple factors, including:

    (a) areas affected by historic mining;

    (b) rehabilitated areas from previous mining;

    (c) current mining and associated infrastructure;

    (d) activities operating under existing use rights;

    (e) activities authorised by consents or licences to the extent to which they are likely to be implemented;

    (f) activities permitted under the relevant planning instruments; and

    (g) requirements associated with existing approvals.

    This results in a baseline that recognises that the plateaux are a complex mosaic of modified, rehabilitated, and intact environments, within which some parts (especially active mining areas) are highly modified.

87. The LAR structures the receiving environment at different scales. It identifies a Broad Scale receiving environment, determined primarily by areas from which the Project will be visible from public locations, and a Project Scale receiving environment covering the plateaux. Within the Project Scale, the LAR further divides the landscape into Landscape Character Units, each representing a coherent part of the plateaux. These spatial units form the structure for describing the receiving environment, identifying landscape values, and assessing visual and landscape effects.

88. As noted in the methodology section above, the LAR draws on a wide range of information sources to describe landscape character at both the Broad and Project Scales.

89. In describing the receiving environment, the LAR uses landform, landcover, land-use, and associated biotic and abiotic characteristics rather than consistently applying the three dimensions of landscape outlined in its methodology. This descriptive structure conveys a high level of environmental detail. It is only partially aligned with the framework used elsewhere in the assessment for identifying landscape values and assessing effects. This inconsistency matters because it privileges physical and land-use attributes, risking an underestimation of the experiential and relational qualities of the landscape and therefore the magnitude of effects.

90. Associative landscape characteristics are framed through tangata whenua cultural values, the plateaux's mining history, industrial archaeology, the presence and management of conservation lands, and recreational use. The description highlights the heritage mining sites and walks, the mountain-bike track network, Myra's Track, and access to Mount Rochfort as features that contribute to how the public experiences and associates with the plateaux.

91. The LAR describes climatic influences that shape the perceptual qualities of the plateaux, including high rainfall, frequent cloud and fog. These factors contribute to the experience of the landscapes as remote, exposed, and at times harsh. These qualities are clearly linked to perceptual experience. They are expressed in a narrative way and are not consistently structured as a distinct component within the perceptual dimension identified in the methodology.

Peer Review Commentary - Landscape Context

Overview

92. The LAR separates the "Existing Environment Approach" set out in the methodology from the subsequent "Description of the Receiving Environment". In practice, the former section does more than establish method, as it defines the scope of the receiving environment to include historic, consented and potential future activities. The latter provides a more conventional description of the landscape. In my opinion, this approach is conceptually unclear, as the "Existing Environment Approach" effectively

defines a mining-focused baseline (including authorised and future activities). The later description provides a broader landscape characterisation, without clearly explaining how these two interpretations of the receiving environment are reconciled.

93. Nevertheless, having read the LAR in full and verified the landscape context through my own site visit and review of supporting materials, I am satisfied that the essential components of the existing environment are adequately covered, even if the structure could have been more streamlined. It is also very apparent that Ms Smetham has a detailed understanding of the context, especially given her earlier work on the BPLS.

94. The LAR describes the Broad Scale and Project Scale receiving environments to a suitable level of detail. The use of landform, landcover, land use, and biotic/abiotic terminology places emphasis on biophysical attributes and can make it challenging to follow the transition back to the physical, perceptual, and associative framework later in the assessment. The descriptions nevertheless demonstrate extensive familiarity with the plateaux landscapes, provide a depth of factual content, and clearly convey the geographic organisation of landscape patterns across the Project area.

95. There is limited explanation in the LAR of how the characterisation was undertaken, presumably because much of the detailed landscape analysis has been compiled in the BPLS. In my view, this results in only limited consideration of how the three dimensions combine to form coherent landscape character. More interpretive insight would have strengthened the assessment, in particular for landscape patterns, processes, unifying characteristics, differentiating factors, and broader themes that define the sense of place across the plateaux. It would have been helpful to see the generalised assessment in the BPLS translated into a more explicit project-focused character narrative rather than relying on it as a primary source of interpretation.

96. The LAR places noticeable weight on planning classifications and land-status designations (such as ONLs or conservation land) as indicators of landscape value. In my opinion, this is inconsistent with the stated methodology. These classifications are mechanisms that recognise landscape values, rather than constituting values themselves. A more methodologically rigorous approach would have involved describing the landscape, identifying the values based on its attributes, and then

acknowledging how those values are represented within statutory or policy frameworks. As written, the LAR at times risks conflating recognition mechanisms with the underlying landscape values, which weakens the interpretive connection between character, value, and effect.

Physical Landscape Values

97. In my opinion, the physical characterisation in the LAR is detailed and technically well-informed, drawing on a broad range of ecological, geological, hydrological, and land-use information. The descriptions of landform, drainage patterns, vegetation types, and evidence of historic and current mining activity are comprehensive and provide a strong factual basis for understanding the physical attributes of the plateaux.

98. The emphasis on physical attributes is partly a function of the nature of mining proposals, which involve substantial biophysical change. In my view, the way the LAR structures its description tends to privilege the physical dimension as the primary basis of landscape character, with perceptual and associative qualities presented more as interpretive layers. This is consistent with conventional practice but less aligned with a fully integrated *Te Tangi a te Manu* approach, where landscape is understood as the interaction of physical, perceptual, and associative attributes from the outset. The physical environment on the plateaux is indeed distinctive and warrants detailed description, however the balance could be improved. This would have provided a basis for assessment grounded in landscape rather than physical environment.

99. The descriptive material is detailed and technically robust. Clearer interpretive linkage between physical attributes and overall landscape character would have improved transparency. For example, the LAR identifies key landforms, drainage patterns, and areas of modification. It provides limited insight into how these physical patterns contribute to broader landscape character (such as what makes particular landforms legible, distinctive, or meaningful) in the wider context of the plateaux.

100. I consider, the physical characterisation would also have benefited from clearer articulation of the relationship between past mining, natural geomorphology, and current patterns of modification. The LAR describes these elements individually. It does not always synthesise them to show how the cumulative physical imprint of historic and contemporary activity contributes to the present-day character of the plateaux. This is important

for understanding how the effects of the Project contribute or detract from the existing character and values.

101. Despite these limitations, in my view the physical characterisation is sufficiently detailed to support an understanding of the site for effects assessment purposes. The factual information is robust, technically accurate, and appropriately sourced. The improvements I have identified relate primarily to the clarity and integration of physical attributes within the broader landscape-character framework, rather than to the adequacy of the physical information itself.

Perceptual Landscape Values

102. In my opinion, the perceptual aspects of the LAR are treated largely in a factual or observational manner, without engaging deeply with the sensory qualities that shape how the plateaux are actually experienced. Earlier landscape evidence for the plateaux has highlighted the importance of mist, cloud cover, and rapid weather shifts in defining landscape atmosphere, yet the LAR does not meaningfully develop these themes. Although vegetation types and slow growth rates are described, there is no discussion of seasonal variation, differences in vegetation density, or how these factors influence visual coherence, colour, texture, or the sense of enclosure and openness over time.

103. In my view, the LAR does not address the acoustic character of the plateaux, such as the contrast between exposed, wind dominated sandstone pavements and the more sheltered conditions of incised gullies. The assessment focuses primarily on observable perceptual attributes and gives limited attention to experiential qualities, including exposure, remoteness, and climate driven sensory conditions. This does not invalidate the assessment, but it reduces the depth of understanding of perceptual landscape values, particularly in environments where landform and climate strongly shape human experience. In my opinion, the perceptual dimension described in the LAR is only partially developed.

104. The LAR omits several key perceptual considerations that I consider should have been addressed in a comprehensive landscape characterisation. The assessment provides limited detail of landscape legibility, wayfinding cues, or the memorability of the plateaux, and does not fully describe aesthetic attributes such as complexity. Important perceptual influences such as spatial scale, openness, and the strong contrast between exposed

pavement and enclosed gullies are noted factually but not interpreted. There is also limited discussion of temporal qualities, including daily and seasonal changes in light, colour, or shadow that contribute significantly to landscape experience.

105. The perceptual dimension is less developed than the physical component and is not always explicitly integrated into the character narrative. The limited development of perceptual attributes reduces the ability to fully understand how the landscape is experienced and how those experiential qualities are affected by the Project. As a result, the LAR is weighted towards what people see rather than what they experience in the place. In my view, this results in a lack of emphasis in the LAR on what attracts many people to the place, which is the experience of being there and moving through or interacting with the plateaux.

Associative Landscape Values

106. In my opinion, the LAR gives limited attention to the broader set of associative values that typically contribute to landscape character. It describes historic mining heritage and recreational use well, but it gives much less consideration to community-based associative values, including local residents' sense of place, identity, or long-standing lived relationships with the plateaux. These elements can be important in landscapes that have been shaped by generations of occupation, industry, or community experience.

107. I consider the associative characterisation would have been strengthened by drawing clearer connections between the physical and perceptual qualities of the plateaux and the meanings people attach to them. For example, the LAR notes the long mining history, but it does not explore how these histories shape community identity, pride, attachment, or local narratives of resilience, nor how contemporary recreational users understand and experience the plateaux as settings for heritage appreciation, challenge, solitude, or exploration. These lived and ongoing human relationships form a critical part of associative landscape values.

108. In my opinion, the LAR also gives limited attention to tāngata whenua values, including cultural narratives, whakapapa associations, and intangible relationships with place such as wairua, mauri, belonging, or intergenerational memory. This results in an incomplete picture of

associative character because the tāngata whenua values are treated as one component of the assessment rather than integral to it.

109. In my view, the reliance on statutory designations (such as DOC conservation land or ONL boundaries) as proxies for value has also limited the deeper exploration of associative meaning. These formal recognitions identify where values exist but do not automatically explain why particular areas hold cultural, historical, or community significance. A more interpretive approach would have described community relationships, cultural associations, and patterns of use first, and then shown how these are reflected (or not reflected) in statutory frameworks.

Other Considerations

110. In my opinion, the characterisation would have been strengthened by distinguishing between landscape types and landscape character areas. The LAR does not identify or discuss broader landscape types such as coal plateau landscapes, escarpments, terrace lands, or the inland–coastal transition zone, nor does it position the plateaux within wider regional or national landscape typologies. This limits the ability to understand how the Buller Plateaux fit within a broader pattern of landscape structure. The Project is large in physical scale, but it also sits within an extensive context of conservation land and surrounding mountain ranges that are considerably larger. Without a typological frame, this relationship is not fully drawn out and the character of the plateaux relative to surrounding landscape types is less clearly articulated.

111. At the project scale, the LAR uses an appropriate Landscape Character Unit (LCU) framework, which aligns well with *Te Tangi a te Manu*. The LCUs are logically defined and reflect coherent landscape patterns but the application of the physical, perceptual, and associative dimensions is uneven across the LCUs. Physical attributes are generally described in detail and with technical accuracy. Perceptual and associative aspects are addressed more briefly, and in some units only receive limited description. This is particularly noticeable in relation to the conservation setting of the plateaux and the relationships that communities and tāngata whenua may hold with public conservation land. These gaps mean that some LCUs are characterised primarily through their physical form and biophysical attributes, without the parallel depth of insight into their experiential or cultural meaning.

112. The LAR would also have benefited from clearer synthesis across LCUs, providing a summary from the BPLS on how the plateaux landscapes are similar or different, what unifies these areas as a coherent landscape system, and what differentiates each character unit. This supports understanding of internal landscape patterning and hierarchies, rather than relying on LCUs as discrete, descriptive compartments.

Peer Review Conclusions - Landscape Context

113. In summary, the LAR presents a substantial and technically informed description of the landscape context, but the structure and application of its methods limit its interpretive clarity. The separation of the existing environment and the receiving environment results in some duplication and fragmentation, and the inconsistent use of landscape dimensions terminology creates potential for confusion. Nonetheless, the broad-scale and project-scale descriptions demonstrate strong familiarity with the Buller Plateaux and provide a solid factual foundation for the assessment.

114. Across the three landscape dimensions, the physical characterisation is the most developed, drawing on detailed ecological, geological, hydrological, and land-use information. It is not consistently integrated with perceptual or associative considerations, and at times reads more as an environmental baseline than a physical landscape narrative. Perceptual character is treated more narrowly, focusing on observable features rather than the experiential or sensory qualities that strongly influence landscape character in these environments.

115. At the project scale, the use of LCUs is appropriate and consistent with *Te Tangi a te Manu*, but the depth of characterisation varies between units, with physical attributes dominating and perceptual and associative qualities under-developed. The LAR would have benefited from distinguishing wider landscape types, positioning the plateaux within a broader typological context, and offering clearer synthesis across LCUs to explain unifying patterns and differentiating factors.

116. Overall, the factual description of the landscape context is generally good and technically robust. The interpretive aspects of character would have benefited from a more consistent and integrated application of the methodology. This would have provided a more complete description of the receiving environment from a landscape perspective.

117. There is a risk that the limitations in characterisation, particularly the incomplete integration of perceptual and associative attributes, result in an underestimation of landscape effects. This is because the full range of landscape values is not consistently identified or carried through into the assessment. I return to this point later in the review.

Statutory Context

Summary of LAR Content - Statutory Context

118. I acknowledge that full detailed assessments of national, regional and district policy are provided in other reports.

119. The LAR describes the statutory context that is related to the consideration of landscape effects primarily in in the methodology and statutory framework sections (including Section 4), with full detail provided in Appendix E. The statutory framing is introduced early in the LAR, including in the methodology and the discussion of the existing environment. Section 4 identifies the legislation and planning instruments relevant to the application, including the Fast-Track Approvals Act 2024, the Resource Management Act 1991, the operative Buller District Plan, the proposed Te Tai o Poutini Plan (Appeals Version), the Crown Minerals Act, Conservation and Reserves Acts, the Heritage New Zealand Pouhere Taonga Act, the West Coast Regional Policy Statement, the West Coast Regional Land and Water Plan, and the West Coast Conservation Management Strategy.

120. The LAR notes that policy provisions from both the operative BDP and the proposed TTPP must be applied, and that cumulative effects must be considered in accordance with the FTAA and the RMA. Outstanding Natural Landscape overlays (ONL49, ONL50, ONL51), scheduled wetlands, and heritage listings form part of the applicable planning context.

121. Section 8 presents the main statutory assessment. In this section, the LAR groups the relevant RMA and plan provisions into themes: natural character, outstanding natural features and landscapes, quality of the environment, visual amenity and cumulative effects. These themes are aligned with the relevant sections of the RMA (6(a), 6(b), 7(c), and 7(f)). The Project is then assessed against these themes to determine its consistency with the policy direction of national, regional, and district planning instruments.

Peer Review Commentary - Statutory Context

122. In my opinion, the LAR correctly identifies the full set of statutory and planning instruments relevant to landscape and visual matters. Section 4 provides a comprehensive list of legislation, national instruments, regional policy documents, district plan provisions, and conservation management materials that apply to the Project. The identification of these documents is consistent with the methodology and creates a logical pathway to the policy analysis in Section 8. I consider this aspect of the LAR to be accurate and reliable.

123. The LAR also describes how the relevant planning instruments address landscape, natural character, outstanding natural features and landscapes, amenity, and broader environmental matters. These provisions are grouped thematically and establish the policy context of the Project. The statutory and policy considerations are connected to the descriptions of the existing environment and identified landscape values, demonstrating an attempt to integrate planning frameworks with the factual components of the assessment.

124. In my opinion, the assessment against policy provisions in Section 8 do not frame the response to relevant objectives and policies with sufficient detail. It identifies themes such as natural character, ONF/ONL, quality of the environment, and visual amenity, but does not provide a detailed analysis of the applicable district or regional plan policies within each theme.

125. I also consider there to be a deficiency in the analysis of how specific policies have been assessed against specific landscape values, effects, and mitigation. The LAR outlines the policy wording and then provides a general statement about how the Project relates to the identified policies, but it does not consistently explain why or how the Project does or does not meet those provisions. This weakens the transparency of the LAR reasoning and makes it difficult to understand the basis for the conclusions.

126. At present, the statutory analysis remains largely descriptive. The material is readable and well structured, but additional explanation is required to demonstrate how the statutory context has shaped the assessment findings. Without clearer links between landscape values, effects, and provisions, the policy context risks appearing as background reference material rather than functional decision-making information.

127. Features that contribute to natural character including wetlands, streams, incised catchments, and intact indigenous vegetation, are not consistently identified or carried through in terms of their contribution to landscape character in a manner that aligns clearly with policy assessment. It is insufficient to assess effects on these features against policy provisions without first identifying their contribution to landscape character. The LAR also does not describe how regional and district plan policy direction has been taken into account when considering these effects.

128. In my view, the quality of the environment assessment does not address the full breadth of the RMA definition. The LAR focuses on long-term ecological recovery and biodiversity outcomes, but “environment” includes amenity, cultural, and aesthetic aspects as well. The assessment does not reconcile how the requirement to maintain or enhance the quality of the environment is achieved when significant landscape and amenity degradation will occur over extended mining periods. The relationship between environmental maintenance/enhancement and the four sanctuary areas is framed in terms of ‘any residual adverse effects’ but this is not clearly described.

129. Similarly, the RMA requires particular regard to the maintenance and enhancement of amenity values. The LAR acknowledges adverse amenity effects but does not provide a fully resolved analysis of how amenity values are ultimately maintained or enhanced. The reliance on rehabilitation downplays the long timeframes required for amenity recovery and the extended period of diminished coherence, legibility, and visual amenity during the life of the mine.

130. The LAR identifies relevant conservation statutes and policy including the Conservation Act, Reserves Act, and the West Coast CMS. In practice, these instruments contain landscape-salient outcomes relating to natural character, landscape integrity, recreation, and heritage values. Because Section 8 is framed primarily around RMA themes, it does not clearly show how CMS outcomes have been considered.

131. In my opinion, the LAR treats heritage as a separate technical discipline rather than as part of the associative landscape dimension. This limits the integration of heritage values within the statutory analysis. Including a short explanation of how heritage mitigation supports policy consistency

(particularly relating to amenity and quality of the environment) would have strengthened the assessment.

Peer Review Conclusions – Statutory Context

132. Overall, I consider the LAR correctly identifies the relevant statutory and policy instruments and reliably summarises their landscape-related provisions. The statutory assessment would have been strengthened by more explicit and consistent integration of those provisions with the identified landscape values, the described effects, and the proposed mitigation. In its current form, the section provides a sound foundation but does not consistently demonstrate how the Project's effects have been evaluated against the specific policy directions.

133. The statutory analysis would have benefited from clearer and more explicit linkage between identified landscape values, assessed effects, and specific policy provisions. This primarily affects transparency rather than the underlying conclusions. The statutory context is correctly identified and provides a sufficient basis for decision-making when read alongside the broader assessment.

Proposal Description

Summary of LAR Content - Proposal Description

134. The LAR Project proposes 16 years of mining in new areas, and approximately 11 years in the Stockton extension, involving ongoing and expanded open-cut coal mining across multiple areas of the Stockton and Denniston Plateaux. Mining operations are proposed to run 24 hours a day, seven days a week, supported by existing infrastructure at Stockton and Ngākawau. The Project is organised into four principal mining sub-areas (Stockton Mine (S), Mount Frederick South (MFS), the Escarpment Extended Mine (ESE), and the Upper Waimangaroa Haul Road (UWHR)) together with predator-proof fenced ecological enclosures on both plateaux.

135. Across the LAR, the Project is described through a consistent set of components, including location, access arrangements, operational staging, disturbance extents, key infrastructure, and anticipated landform change. The assessment links these components to the Graphic Attachment, which includes mining footprints, haul roads, stream crossings, engineered landforms, access routes, and representative viewpoints. Visual

Simulations (Appendix C) are referenced to demonstrate how each sub-area will appear at different operational stages.

136. At Stockton (S), mining is proposed post-2027 within the existing mining licence area, extending extraction into new pit locations while using established haul roads, processing facilities, and water-treatment systems.

137. The MFS sub-area lies on the southern part of the Stockton Plateau and includes two new pit areas, associated overburden placement, internal haul roads, water-management structures, and access via the proposed UWHR.

138. The UWHR is described as a transport corridor linking Denniston and Stockton via a combination of upgraded existing tracks and new road construction, with culverts, bridges, and laydown areas integrated into the design.

139. The ESE sub-area comprises the expansion of mining at and around the existing Escarpment Mine footprint, with a central infrastructure area, stockpiling facilities, haul roads, and staged pit development across an extensive footprint.

140. The project description also includes pest-proof fenced ecological sanctuaries at Mt Augustus and Whirlwind Rise on Stockton Plateau, and at Denniston and Coalbrookdale on the Denniston Plateau.

141. LAR Sections 5.5 to 5.7 outline cross-project ecological management, rehabilitation, and mitigation frameworks applied consistently across all sub-areas. These include sequencing of extraction and rehabilitation, construction of engineered landforms, placement of non-acid-forming material, vegetation direct transfer and planting methods, wetland and stream reinstatement techniques, and post-closure landform stabilisation. Rehabilitation is intended to occur progressively during mining, with final landforms integrating a mix of forest, shrubland, pākihi, rock pavement, and water infrastructure.

142. Project information is presented throughout the LAR wherever relevant to the landscape and visual assessment, including operational duration, mining sequence and staging, haul-road construction, location of water-management structures, lighting, and the expected pattern of landscape change over time. The description also integrates contextual matters that apply across all sub-areas, such as use of existing infrastructure, hydrological management requirements, the presence of

historic mining features in some locations, and the establishment of predator-proof enclosures to offset ecological effects.

Peer Review Commentary - Proposal Description

143. I recognise that there is a separate, extensive Project Description document, and that repeating all elements of this is unnecessary in the LAR.

144. In my opinion, the LAR does not systematically set out in one place which components of the Project are assessed for landscape effects and which are treated as part of the existing environment. The LAR refers to certain infrastructure and operational activities as unchanged or outside the scope of the assessment. It does not clearly set out a consolidated statement distinguishing these categories. This creates some ambiguity around the boundaries of the effects assessment, particularly given the overlap between historic mining infrastructure, ongoing operational activities, and newly proposed works.

145. In my view, the assessment would have been strengthened by an explicit statement identifying the elements excluded from consideration, along with the rationale for their exclusion. Presenting this information in a brief, dedicated section would have improved transparency, help avoid misunderstandings about the scope of the assessment, and ensure information can be readily distinguished between aspects evaluated as part of the proposal and those considered baseline conditions.

146. Even with the full Project Description provided separately, in my opinion the LAR would have benefited from a concise, landscape-focused summary of staging and sequencing. Understanding when different phases of extraction, haul-road establishment, infrastructure construction, and rehabilitation occur is essential for interpreting the magnitude and duration of landscape and visual effects. Because effects vary significantly at different points in the mining life cycle, the staging pattern is a critical component of the landscape assessment framework.

147. There is no single, integrated sequencing overview for the Project as a whole. At present, staging details appear unevenly presented across the various sub-areas. For example, the MFS sub-area includes partial staging information, the ESE sub-area is described in broader terms. Without a clear description of when pits are active, when skylines are modified, when

haul roads become operational, or when rehabilitation begins to influence visibility and landscape character, it becomes difficult to understand the relative timing, duration, and intensity of landscape effects as described in later sections of the LAR.

Peer Review Conclusions – Proposal Description

148. I consider the Project Description draws on reliable and comprehensive source material, with clearly defined sub-areas and supporting graphics and visual simulations. The underlying information is sound and demonstrates a thorough understanding of the Project. However, the way this information is organised within the LAR reduces the ease of understanding the timing, extent, and interaction of project components, and how these underpin the assessment of landscape and visual effects.

149. Notwithstanding these presentation issues, the LAR contains sufficient information to understand the proposal and how it will develop over the life of the Project. It is evident that Ms Smetham has a sound understanding of the Project and its complexities.

150. Overall, while the Project Description includes the necessary factual components, it would have benefited from clearer structure and synthesis. A more consolidated, landscape-focused summary of project elements, exclusions, and staging would have materially improved clarity and defensibility.

REVIEW: ASSESSMENT OF LANDSCAPE EFFECTS

Key Matters

151. The LAR provides an introduction to the assessment of effects on landscape values (Section 7). It immediately sets up the range of landscape effects and the use of two scales for assessment (Broad-Scale and Project-Scale). These two scales are used throughout the LAR, in Sections 3, 6, 7 and 8.

152. While not identified in the methodology section, it is common to provide a list of key matters, which is essentially what this section provides. In my opinion, this could have been identified in the methodology, as a way to guide the reader through the LAR. It is not clear how the list of potential effects has been identified and how the list relates to the subsequent assessment of landscape effects. The issues are not clearly framed in relation to the statutory provisions, which would have helped to explain their relevance to the subsequent assessment of landscape effects.

Visual Effects

Summary of LAR Content - Visual Effects

153. The assessment of visual effects in Section 7.1-7.3 provides a clear explanation of what visual effects are, how they relate to landscape effects, and how they have been evaluated. This framing strengthens the LAR's high-level methodology section by clarifying that visual effects are a subset of landscape effects, and that visual assessment is a tool to understand how visible changes influence landscape values.

154. Representative viewpoints are used at Broad- and Project-scales, each linked to locations shown in the Graphic Attachment (GA). For each viewpoint, effects are evaluated using the seven-point effects rating scale from the methodology, ranging from Very Low to Very High. The assessment recognises that the nature and magnitude of visual effects depend on factors such as distance, visibility, duration, lighting, viewer activity (moving or stationary), and viewer sensitivity. The ratings are summarised in Appendix A: Table 1.

155. At the Broad-Scale, the assessment finds that visual effects are generally none to low, influenced by distance, topography, coastal haze, and the limited visibility of mining activities. At the Project-Scale, where viewers are

closer to the activity, visual effects are assessed as low to very high during active mining, especially where new excavation or lighting is visible.

Peer Review Commentary - Visual Effects

156. The LAR separates visual and landscape effects into sections, with visual findings informing the subsequent landscape effects assessment. This relationship is generally apparent, with the visibility-based findings synthesised within the broader evaluation of landscape values.

157. The methodology outlines that visual effects are assessed first and then used to inform the Landscape Effects Assessment. However, the LAR provides only a high-level explanation of how the visual assessment is integrated into the overall values-based framework. The integration is generally evident in the assessment, but is not always clearly articulated.

158. Nevertheless, I consider that the inclusion of visual simulations (Appendix C) strengthens the assessment. The mapped figures in the Graphic Attachment support the understanding of viewpoint locations and the visibility of specific project components. Appendix A: Table 1 provides a useful consolidated summary of effects from all viewpoints at Broad- and Project-Scale.

159. For each viewpoint the LAR identifies the viewing distance, viewing angle, screening effects from landform and vegetation, the degree of visibility of mine components, and whether lighting may be seen during night-time hours. The assessment also acknowledges both daytime and night-time viewing and the likely duration of viewing for different types of viewers (e.g. moving road users versus stationary observers).

Peer Review Conclusions – Visual Effects

160. In my view, Section 7 provides a systematic assessment of visual effects. Greater clarity in explaining how these visual findings are carried through into the assessment of effects on landscape values would have made it easier to follow and help demonstrate the linkage between visibility and the overall evaluation of landscape effects.

Landscape Effects

Summary of LAR Content - Landscape Effects

161. Section 7.1-7.3 of the LAR provides a visual effects assessment of viewpoints at a Broad-Scale and Project-Scale, followed by a summary of the visual effects assessment. Appendix A (Table 1) provides a structured summary of visual effects by viewpoint and two timeframes.

162. It then provides a landscape effects assessment by project sub-area in 7.4, with a summary of the landscape effects assessment for each sub-area and an overall conclusion covering all sub-areas. Appendix A (Table 2) provides a structured summary of landscape effects for the LCU by project sub-areas across values, and three timeframes (during mining, first 10 years post mine closure, and 10 to 50 years + after mine closure. The table is logically organised and assists in understanding the overall pattern of effects identified in the LAR.

163. The LAR reiterates the conceptual foundation for landscape effects, stating that a landscape effect is an outcome for a landscape value, and distinguishes this from landscape change more generally. Only changes that have implications for identified values are assessed.

164. Effects are assessed to reflect operational activities, progressive rehabilitation, and the long-term establishment of indigenous vegetation communities. Physical effects during mining are typically assessed as high to very high, with perceptual and associative effects varying according to the degree of visibility, local landscape character, historic context, and compositional qualities of each LCU. Over time, the assessment anticipates a reduction in adverse effects.

Peer Review Commentary - Landscape Effects

Overview

165. The LAR frames landscape effects as outcomes for identified landscape values, distinguishing these from general landscape change through a values-based approach. This is broadly consistent with the stated methodology of the LAR.

166. The landscape effects assessment in Section 7.4 revisits a number of matters addressed in the visual assessment (Sections 7.1–7.3), including

visibility, lighting, skyline modification and amenity outcomes from individual viewpoints. While this reflects the role of visual effects as an input to the broader assessment, the linkage between the two sections is not well explained. As a result, similar visibility-based considerations are carried through but not explicitly reframed in terms of effects on landscape values, requiring connections to be made across different sections of the LAR and appendices.

167. Section 7.4 does not contain a clearly consolidated and synthesised summary of landscape effects. While Appendix A (Table 2) provides a structured summary of effects across values, sub-areas and timeframes, this synthesis is not clearly reflected within the narrative assessment itself.

168. As a result, Section 7.4 does not explicitly identify:

(a) the primary landscape effects arising across the Project (for example, major landform modification, removal of indigenous vegetation, changes to hydrology, alteration of perceptual qualities, and the loss or modification of heritage features);

(b) the principal drivers of those effects (including excavation, highwalls, engineered landforms, haul roads, vegetation clearance and lighting); and

(c) the most sensitive receptors, whether defined at the Project Scale (including visitors to Denniston, residents at Millerton and recreational users) or at the Broad Scale (such as travellers along SH67 and coastal settlements).

169. These elements are dispersed across the assessment or implied within the summary table, requiring the reader to infer how the overall assessment has been derived. This reduces the clarity and transparency of the assessment.

170. The relationship between Appendix A and the narrative assessment in Section 7 is not clearly described. Effect ratings are not consistently traceable to the supporting analysis, and in some instances the table presents a level of structure and specificity that is not obviously derived from the main body of the LAR.

171. The assessment concludes that effects at the Broad Scale are generally low. In my view, this conclusion is not fully substantiated by a clear

analytical framework. While distance, topographic screening, and the presence of existing mining activity are identified as moderating factors, the LAR does not present a structured analysis of visibility (such as extent, frequency, duration, or proportion of the Project visible from key receptors), nor does it clearly evaluate viewer sensitivity or the susceptibility of the wider landscape context to change.

172. In particular, in my opinion, the relationship between the Project and surrounding Outstanding Natural Landscapes is not rigorously examined. While the presence of ONL classifications is acknowledged, the assessment does not clearly test whether the proposed changes affect the key attributes of those landscapes, including their natural character, coherence, and experiential qualities.

173. As a result, the conclusion that broad-scale effects are limited to low levels appears to rely on generalised assumptions regarding distance and existing modification, rather than a transparent evaluation of how identified landscape values at that scale may be affected.

Effects on Physical Landscape Values

174. In my opinion, the LAR appropriately identifies the key physical effects of the Project, including large-scale modification of landform, removal of indigenous vegetation, changes to hydrology, the creation of engineered landforms, and the disturbance or loss of physical heritage features. These physical changes are assessed for each Project sub-area within the landscape effects assessment in Section 7.4, drawing on the landscape values framework established earlier in the report. The assessment clearly recognises that physical effects during active mining are typically high to very high, particularly where excavation alters ridgelines, skylines, natural drainage patterns, and wetland or rock pavement ecosystems.

175. The LAR also acknowledges the role of post-closure vegetation establishment and rehabilitation in reducing physical effects over the medium to long term. In my view, the assessment could be strengthened by providing a more consolidated summary of the most critical biophysical changes across the Project, and by more clearly distinguishing between those physical effects that are permanent or irreversible (such as fundamental landform change and reconfiguration of drainage systems) and those that are temporary or reversible through rehabilitation.

176. Where fundamental landform patterns are altered, the resulting landscape may not fully replicate pre-existing character, even where ecological recovery is successful. This distinction is important in evaluating the extent to which landscape effects are reduced over time.

Effects on Perceptual Landscape Values

177. In my view, the LAR appropriately identifies and describes key perceptual effects of the Project, with reference to the perceptual attributes outlined earlier in the report, including natural character, legibility, coherence, memorability, and the experience of enclosure or exposure. The assessment within Section 7.4 generally recognises that perceptual effects during active mining are typically moderate-high to very high at the Project Scale, particularly where mining alters skylines, ridgelines, drainage patterns, or introduces large-scale engineered landforms, lighting, and increased activity within previously coherent or austere landscapes. The LAR also recognises that perceptual effects are typically reduced at the Broad Scale due to distance, atmospheric conditions, and topographic screening.

178. In my view, the assessment could have been strengthened by more clearly distinguishing between perceptual effects arising from visible change and those arising from changes in experiential qualities of the landscape, such as sense of remoteness, naturalness, or coherence. Greater clarity in this regard would have better aligned with the distinction between visual effects and broader perceptual landscape effects. In addition, the assessment would have benefited from a more explicit synthesis of how perceptual values are expected to evolve over time as rehabilitation progresses towards a more naturalised landscape condition.

Effects on Associative Landscape Values

179. In my view, the LAR appropriately identifies the key associative values relevant to the Buller Plateaux, including historic mining heritage, recreational use, and broader community connections to the landscape, as described within the receiving environment section of the report. The landscape effects assessment in Section 7.4 recognises that the Project will result in moderate to high adverse effects on these associative values where historic features are removed, modified, or made less legible, and where recreational access or experiential qualities are altered during the mining period.

180. I note that the LAR identifies mitigation measures such as recording, recovery, interpretation, and the establishment of fenced sanctuary areas as contributing to the retention or enhancement of certain associative attributes over time. These measures are relevant, but in my view the extent to which they offset the loss or modification of historic features or changes to experiential qualities is not always clearly demonstrated within the assessment.

181. In my view, the assessment could be strengthened by more explicitly identifying which associative values are most sensitive to change, and by more clearly distinguishing between temporary effects (such as reduced access during mining) and more enduring effects relating to heritage fabric, sense of identity, and long-term recreational patterns. Such clarification would have improved the transparency of how effects on associative values are derived and assessed.

182. As outlined earlier, the LAR identifies tangata whenua values at a relatively high level and in a limited way, without clearly linking these values to the specific receiving environment or Project sub-areas. The report refers to Poutini, pounamu traditions, and Sites and Areas of Significance to Māori (SASM) at a district scale. These references remain generalised and are not translated into place-specific landscape attributes within the assessment. In particular, the LAR does not clearly identify locally relevant maunga, awa/named waterways, placenames, mahinga kai sites, or culturally significant catchments within the Project area.

183. The Cultural Impact Assessment (CIA) prepared by Te Rūnanga o Ngāti Waewae provides a more detailed and place-based account of tangata whenua values. It also makes clear that the landscape is understood holistically as an interconnected system of land, water, resources, and cultural associations, rather than a series of discrete sites.

184. In my view, the CIA provides a detailed and place-based account of tangata whenua values. These are only partially reflected within the LAR's landscape values framework. This reduces the clarity of how cultural landscape attributes relate to the identified landscape values and effects, although the CIA itself provides assessment of these matters. In my opinion, the assessment would have been strengthened by more explicit incorporation of the CIA information into the landscape assessment framework.

185. This limitation means that culturally derived landscape relationships are not fully described across the landscape assessment framework. The overall understanding of landscape effects is not fully resolved within the LAR, particularly in relation to associative and cultural values, and relies on the CIA.

Peer Review Conclusions – Landscape Effects

186. Overall, I consider the LAR establishes a sound conceptual, values-based framework for assessing the landscape effects. The relationship between visual and landscape assessments, and between the narrative and summary tables, is not well integrated, reducing traceability of effect ratings. In addition, broad-scale conclusions, including the finding of generally low effects, are not always robustly supported by a structured analysis of visibility, viewer sensitivity, or landscape susceptibility to change, and do not adequately test potential effects on Outstanding Natural Landscapes. While associative values, including tangata whenua relationships, are acknowledged, these are not sufficiently developed within the landscape framework and rely heavily on the CIA.

187. As a result, in my opinion the assessment provides a reasonable identification of landscape effects but does not fully resolve or clearly communicate the overall pattern, significance, and underlying basis of landscape effects, particularly in relation to cultural and broad-scale landscape values.

Cumulative Effects Assessment

Summary of LAR Content - Cumulative Effects

188. The LAR states that cumulative effects require consideration under the Fast-track Approvals Act and defines cumulative effects as those that arise over time or in combination with other effects. It also defines the existing environment to include historic mining activities, permitted activities, activities authorised by existing consents where they are likely to be implemented, and rehabilitation or offset requirements associated with current consents and licences.

189. Within this framework, the LAR identifies that cumulative effects may result from mining and associated activities occurring simultaneously across the Denniston and Stockton Plateaux.

190. Beyond this explanation, the cumulative effects discussion remains relatively high level. The LAR states that the cumulative effects primarily arise from the widespread visibility of multiple mine areas across the plateaux.

191. Without an integrated assessment of simultaneous disturbance across multiple subareas, the LAR does not test whether the Project results in a threshold shift in overall landscape character at the scale of the plateaux. This limits confidence that cumulative effects have been fully identified and assessed.

Peer Review Commentary - Cumulative Effects

192. The cumulative effects analysis does not progress beyond a general acknowledgement of cumulative effects. It remains largely descriptive and does not apply a structured method for evaluating how effects combine across the Project.

193. There appears to be limited recognition that while cumulative effects reduce over time post mine closure and from rehabilitation, the duration at which the cumulative effects are high or very high extends over potentially decades. The focus is also on visibility as the source of the cumulative effects when they have potential to impact impact physical, perceptual and associative values.

Peer Review Conclusions - Cumulative Effects

194. Overall, while the LAR identifies the potential for cumulative effects within a defined framework, the assessment remains high level and does not apply a structured or integrated method to evaluate how effects combine across space and time. As a result, the potential for a broader shift in landscape character across the plateaux is not clearly tested, limiting the depth of the cumulative effects assessment.

Assessment Design (Mitigation) Response

Summary of LAR Content - Design (Mitigation) Response

195. The LAR presents a comprehensive package of landscape management measures that together form the Project's approach to avoiding, remedying, and mitigating effects on landscape values. At the core of the set of

measures is progressive physical rehabilitation, which is implemented alongside ongoing mining. This includes:

(a) shaping engineered landforms to create stable, naturalistic slopes;

(b) reinstating drainage patterns so that streams and catchments function more naturally;

(c) placing capping and soils to support revegetation;

(d) applying vegetation direct transfer (VDT) where intact sods of native vegetation can be salvaged;

(e) planting indigenous species; and

(f) creating or reinstating wetlands and tarns.

196. These measures are intended to progressively establish naturalistic landform patterns, hydrological relationships, and vegetation cover so that the plateaux develop a more self-sustaining ecological structure and landscape coherence over time.

197. These physical and ecological measures are supported by visual and experiential mitigation that addresses how the landscape is perceived during the operational period and into the post-closure phase. This includes the use of landform design to reduce visual contrast, management of lighting to limit night-time visibility, and sequencing of mining and rehabilitation to reduce the duration of exposed areas. Together, these measures seek to limit the extent to which mining activity dominates views or alters the character of the surrounding plateaux.

198. The mitigation package also includes measures relating to heritage and associative values, such as recording, recovering, or interpreting historic mining features where they are affected. Access management is used to maintain safety and manage interactions with recreation during operations. The LAR identifies potential for post-closure recreational opportunities associated with legacy access routes and infrastructure. These measures respond to both the physical attributes of the landscape and the cultural and historic associations that contribute to its identity.

199. In addition to rehabilitation of mined areas, the LAR incorporates ecological enhancement and offsetting measures, most notably the creation of predator-proof (pest-free) enclosures on both the Stockton and Denniston

Plateaux. These fenced areas protect intact plateau ecosystems and provide long-term conservation benefits, contributing to the maintenance and enhancement of ecological values that are closely linked to landscape character. These measures are primarily framed in ecological terms. Their relationship to broader cultural landscape values, including tangata whenua perspectives addressed in the CIA, is not explicitly articulated within the LAR.

200. Taken together, the physical rehabilitation, ecological restoration, visual mitigation, heritage management, access controls, and enhancement measures form an integrated landscape management response addressing effects across the physical, perceptual, and associative dimensions of landscape. They are intended to function as a coordinated suite of actions that support both short-term containment of effects and longer-term restoration of natural character and landscape integrity across the Buller Plateaux.

Peer Review Commentary - Design (Mitigation) Response

201. In my view, the LAR provides technically robust descriptions of physical rehabilitation measures, including landform shaping, drainage reinstatement, indigenous revegetation, wetland creation, and progressive rehabilitation aligned with mining stages. The assessment gives limited consideration to how the resulting combination of rehabilitated ecosystems, predator-proof enclosures, wetlands, lakes, and reconstructed streams may influence the future sense of place or the way the post-mining landscape is experienced and understood over time.

202. In my opinion, rehabilitation is primarily presented as an ecological and biophysical mitigation process, rather than as a landscape design response that actively contributes to a defined post-mining landscape character. The implications of rehabilitation for the perceptual and associative dimensions of landscape are not fully explored.

203. The proposed landscape management measures include both actions required under existing CML obligations and measures introduced specifically for the Project. In my view, the LAR lacks distinction between the baseline rehabilitation that would occur in the absence of the Project and the additional commitments associated with managing the Project's effects. At present, it is not always clear how these different strands are

distinguished, which makes it more difficult to identify the extent to which proposed measures respond specifically to the effects of the Project.

Approach and Intended Outcomes

204. Given the slow vegetation growth rates typical of the plateaux, in my view the LAR could more clearly communicate realistic timeframes for canopy development, visual integration, and the practical constraints associated with rehabilitating steep features such as highwalls, where access limitations may affect long-term establishment.

205. In my opinion, the proposed measures could be more clearly linked to the broader landscape outcomes sought. The LAR focuses primarily on biophysical rehabilitation outcomes, with less explicit explanation of how these will influence perceptual and associative values. This limits the clarity of anticipated landscape outcomes. It does not undermine the overall conclusion that effects will reduce over time.

Operations Measures

206. he LAR identifies a number of operational measures intended to manage landscape-related effects during the active mining period. These are largely described in technical terms, and the assessment provides limited explanation of how they influence the day-to-day experience of the landscape over time. In my view, unclear articulation of how operational measures moderate perceptual and experiential effects during the life of the Project weakens the assessment.

Rehabilitation Measures

207. In my view, the LAR lacks clear explanation of how the arrangement, timing, and extent of rehabilitated versus active areas are intended to function as a mitigation measure. The Graphic Attachment provides mapping showing disturbance staging and the sequence of rehabilitation for each of the Project areas. The existing vegetation pattern and proposed rehabilitation pattern of revegetation, water infrastructure and rockfield areas is also provided. Pest-free enclosure areas are also shown in relation to the disturbance areas.

208. The LAR contains detailed descriptions of landform shaping, soil placement, hydrological reinstatement, vegetation direct transfer, indigenous planting, and wetland and stream creation; these elements are

presented across multiple sections without being brought together into a single coordinated framework. In my opinion, a more consolidated description of the rehabilitation approach including objectives, sequencing, methods, timeframes, expected outcomes, and monitoring is needed to improve overall clarity. This would have assisted in understanding how the various components combine to achieve the intended long-term landscape outcome.

209. In my opinion, weak clarity on anticipated rehabilitation outcomes over time weakens the assessment. The LAR describes the methods to be used. It provides limited information on expected vegetation trajectories, canopy development timeframes, or the evolution of landscape character over time. Given the slow growth rates typical of the plateaux and the constraints associated with rehabilitating steep areas such as highwalls, a clearer indication of likely outcomes at different stages would have improved understanding of what rehabilitation is expected to achieve in practice.

210. The proposed measures are technically robust in relation to physical rehabilitation. The absence of a clearly articulated landscape outcomes and the limited consideration of perceptual and associative values reduces confidence that the full range of landscape effects will be sufficiently managed.

Peer Review Conclusions – Design (Mitigation) Response

211. In my view, the LAR presents a technically strong and well-developed suite of mitigation measures, particularly in relation to physical and ecological rehabilitation. The descriptions of landform shaping, hydrological reinstatement, indigenous revegetation, wetland and stream creation, and progressive rehabilitation are detailed and robust, and the LAR identifies operational measures intended to manage effects during the active mining period.

212. The mitigation package is framed predominantly around biophysical restoration, with more limited consideration of the perceptual and associative dimensions of landscape. While these values are assessed within the LAR, the report does not always clearly articulate how physical rehabilitation measures are expected to influence longer-term landscape character, sense of place, or experiential qualities. The relationship between the proposed physical interventions and broader landscape

outcomes is therefore not consistently expressed, reducing clarity in how the full range of landscape values is addressed.

213. The mitigation measures include both rehabilitation required under existing CML obligations and additional measures associated with the Project. In my view, the distinction between these elements is not always clearly expressed, which reduces clarity in understanding the extent to which proposed measures respond specifically to the effects of the Project.

214. Overall, I consider the proposed landscape management measures represent a comprehensive and conceptually sound approach to physical rehabilitation. The mitigation framework is technically robust, particularly in relation to biophysical outcomes, but is less clearly developed in terms of how it addresses perceptual and associative values. Greater clarity in linking rehabilitation measures to anticipated landscape character and experiential outcomes would have strengthened the coherence and transparency of the assessment.

Assessment Against Statutory Provisions

Summary of LAR Content - Assessment of Statutory Provisions

215. Section 8 of the LAR presents the assessment of the Project against the statutory provisions identified earlier in Section 4. The section also reflects the non-statutory contextual documents identified earlier, including the New Zealand Geopreservation Inventory and ecological district classifications.

216. The LAR evaluates the Project in relation to the main policy themes relevant to landscape matters, including natural character, outstanding natural landscapes and features (ONLs/ONFs), quality of the environment, and visual amenity. For each of these themes, the assessment draws on the earlier description of the receiving environment in Section 6 and the visual and landscape effects assessment set out in Section 7. The section reviews how the Project aligns with, responds to, or affects the outcomes sought in the statutory documents, including protection of natural character, safeguarding ONLs and ONFs, maintaining or enhancing environmental quality, and managing visual amenity effects at both broad and local scales.

217. This statutory analysis draws together the identified landscape values and associated effects within a policy context, outlining how the Project relates to the relevant legislative and planning framework. Together, Sections 4 and 8 set out the applicable statutory context and provide the basis for

interpreting the landscape and visual effects of the Project within that framework.

Peer Review Commentary – Assessment of Statutory Provisions

218. In my view, Section 8 does not always clearly show how the earlier identification of landscape values, effects, and proposed mitigation has been carried through into the statutory assessment. The conclusions are presented at a relatively high thematic level, and the relationship between the assessed landscape values and effects, and the resulting statutory findings, is not always clearly expressed. This limits the transparency of how the landscape assessment outcomes have informed the statutory provisions assessment.

219. Features that contribute to natural character, such as the wetlands of the Denniston Plateau and named streams within the Project area, are not consistently identified in the earlier description of landscape character and values. In my view, this reduces the clarity of how these features are treated within the overall landscape assessment, and in turn how their contribution to natural character is reflected in the subsequent statutory discussion.

220. In my opinion, the analysis of ONL 50 does not clearly resolve the relationship between the landscape values identified for the ONL and the effects of the Project. ONL 50 is described as having contiguous indigenous vegetation cover and highly legible natural patterns. The Project results in vegetation removal and changes to vegetation patterns and skylines. The statutory discussion does not clearly link these effects back to the specific landscape characteristics and values identified for the ONL.

221. Section 8.3 addresses quality of the environment, but does so primarily at a general level. The assessment notes that environmental quality is reduced during active mining and improves following rehabilitation, the linkage between these observations and the underlying landscape attributes and values identified earlier in the report is not clearly articulated, including how proposed mitigation contributes to those outcomes over time.

222. The assessment acknowledges that the Project will give rise to adverse amenity effects. In my view, Section 8 does not clearly relate those effects back to the amenity values identified in the landscape assessment, particularly in terms of their scale, duration, and the extent to which they

alter the character and experience of the landscape during the operational period.

223. Section 4 identifies the Conservation Act, Reserves Act, and West Coast Conservation Management Strategy (CMS) as relevant to the Project. In my view, Section 8 does not clearly demonstrate how the landscape attributes and values identified earlier in the report, including those relating to natural character, heritage, and recreation, have been considered in relation to these matters within the overall landscape assessment.

Peer Review Conclusions – Assessment of Statutory Provisions

224. Overall, while the LAR presents the relevant statutory provisions and aligns the Project with key policy themes, in my view the assessment remains high level and does not clearly demonstrate how identified landscape values, effects, and mitigation measures have informed the statutory conclusions. As a result, the linkage between the landscape assessment and statutory outcomes is high-level. This is particularly in relation to natural character, ONLs, amenity, and conservation-related provisions, which is not highly detailed, limiting the transparency and defensibility of the assessment.

Peer Review Conclusions on Landscape Effects

225. In my view, the LAR presents a substantial body of work that demonstrates a clear understanding of the Buller Plateaux landscapes and applies the assessment methodology set out earlier in the report. Section 7 applies this framework through a series of sub-area assessments that address both visual and broader landscape effects.

226. There are areas where the assessment could be strengthened to improve clarity, internal logic, and overall legibility. The structure of Section 7, which addresses visual and landscape effects in separate components, results in some repetition and can make it difficult to clearly understand the overall picture of landscape effects. A more consolidated synthesis would have drawn together the substantial amount of information presented. Effects are generally well described. The assessment could more clearly distinguish between temporary and irreversible effects and provide fuller consideration of how perceptual and associative qualities may change over time.

227. The conclusion that landscape effects will reduce to low or negligible levels over the medium to long term relies heavily on the anticipated success of

rehabilitation measures. In my view, the importance of this aspect of the project would have been better supported by more detailed analysis.

228. While the LAR provides a detailed description of rehabilitation methods and ecological recovery processes, it does not clearly demonstrate how these outcomes will translate into the reinstatement of key landscape values, particularly those relating to landform, natural character, and perceptual qualities.

229. In particular, the assessment acknowledges that post-mining landforms will be engineered and may exhibit reduced geomorphic complexity and uniformity of slope. The implications of these changes for landscape legibility, naturalness, and coherence are not fully evaluated. These attributes are central to landscape character within the plateaux environment and are not necessarily restored through vegetation cover alone.

230. The assessment therefore relies on an implicit assumption that ecological recovery will equate to recovery of landscape values. In my view, this relationship is not sufficiently demonstrated. As a result, the conclusion that residual effects reduce to low or negligible levels appears optimistic and would have benefited from more explicit evaluation of the extent to which key landscape attributes are reinstated over time.

231. The statutory section identifies the relevant planning framework but does not always clearly show how the landscape values and effects identified earlier in the assessment are reflected in the subsequent discussion. Clearer linkage between the landscape assessment findings and the topics addressed, including natural character, ONLs/ONFs, environmental quality, amenity, and conservation-related matters, would have improved the transparency of the overall assessment.

232. The assessment also recognises cumulative effects and defines the existing environment in accordance with the FTAA. The cumulative effects discussion remains relatively high level and does not clearly articulate how combined effects across multiple Project sub-areas are experienced over time, particularly in relation to staging, sequencing, and the interaction of visible changes across the wider landscape.

233. I consider that the LAR provides a detailed assessment of the Project's landscape effects. There are areas where clarity and integration could be

improved. Aspects of the Project may be addressed in supporting technical reports; they are not always clearly expressed within the landscape values-based framework adopted in the LAR.

234. Across the assessment, landscape values are identified at a relatively high level, including very high perceptual qualities associated with scale, remoteness, and legibility. The translation of these identified values into effects ratings is not always transparent. In some instances, the relationship between the sensitivity of the receiving environment and the magnitude of change is not clearly articulated, making it difficult to trace how the final effects ratings have been derived.

235. Greater clarity in this regard would have assisted in demonstrating that the assessment outcomes are proportionate to the identified landscape values and are consistently applied across scales and timeframes.

CONCLUSIONS

LAR Conclusions

Summary of LAR Content - Conclusions

236. The LAR concludes that the Project will result in significant adverse landscape effects at the Project Scale during mining, with substantial changes to landform, vegetation, hydrology, and the experiential qualities of the Stockton and Denniston Plateaux. These effects are assessed as moderate–high to very high. At the Broad Scale, effects on visibility and perceptual influence are assessed as lower, resulting in no to low adverse effects across the wider coastal and district landscape.

237. The LAR places emphasis on progressive rehabilitation as fundamental to long-term landscape outcomes. Over time, landform re-shaping, hydrological reinstatement, and native vegetation recovery are anticipated to reduce effects, with residual landscape and visual effects assessed as low to negligible within 10–50 years post-closure.

238. Short-term effects on heritage and recreation values are identified, arising from access restrictions and changes to amenity, but these are expected to lessen over time, with potential for improved access and interpretation in the post-mining landscape. Overall, the LAR concludes that short-term adverse effects are high. The long-term landscape condition is expected to progressively reintegrate with the wider plateau environment as rehabilitation matures. mature.

Peer Review Commentary - Conclusions

239. In my view, the conclusions reached in the LAR generally reflect the analysis presented. The LAR identifies a clear pathway by which landscape effects reduce over time through rehabilitation, supported by reference to conditions on the Stockton Plateau and the anticipated progression of landform and vegetation recovery. However, as I have set out, there are areas where the assessment could more clearly articulate how outcomes for perceptual and associative values will be achieved. The overall conclusions are broadly consistent with the scope and direction of the assessment.

Peer Review Conclusions – Conclusions

240. Overall, the LAR concludes that the Project will result in substantial adverse landscape effects at the Project Scale during mining, with effects progressively reducing over time through rehabilitation to a low or negligible level in the long term, while broad-scale effects remain limited. In my view, these conclusions are generally consistent with the LAR, although the extent to which long-term outcomes for perceptual and associative values are achieved is not comprehensively demonstrated.

Overall Peer Review Conclusions

241. As I outlined at the start of this review, I have focussed on the potential gaps in the LAR. Overall, I find the report to be very detailed, supported by comprehensive technical information and underpinned by other supporting documents.

242. Overall, the LAR provides a detailed and generally well-informed assessment of the Project, supported by a substantial information base and a methodology that is broadly aligned with *Te Tangi a te Manu*. It identifies the principal physical changes associated with the Project and provides a detail of the nature and scale of landscape effects, particularly at the Project Scale during active mining.

243. However, in my opinion, there are important limitations in the application of the methodology. In particular, the integration of physical, perceptual, and associative landscape dimensions is inconsistent, and the pathway between identified landscape values and assessed effects is not always clearly demonstrated. The treatment of perceptual and associative values, including tangata whenua relationships, is comparatively underdeveloped, and cumulative effects are not systematically assessed.

244. In addition, aspects of the assessment, including the evaluation of broad-scale effects and the anticipated reduction of effects over time through rehabilitation, are not fully substantiated by the analysis presented and rely on assumptions that are not explicitly tested within the LAR.

245. As a result, in my view, while the LAR provides a useful and credible foundation for understanding the Project and its likely landscape effects, it does not consistently present a fully integrated or transparent evaluation of those effects across all landscape dimensions and timeframes.

246. Having said this, I consider the LAR can be relied on to identify the broad nature and scale of effects of the project. However, caution should be applied to the long term reduction of effects.

Shannon Bray
12 August 2026