

## Appendix B5

### EDS - Summary of evidence - Landscape (Evidence of Elizabeth (Anne) Steven)

Issue	Summary of EDS evidence	Reference
Methodology	<ul style="list-style-type: none"> <li>• Omissions / inconsistencies affect assessment of effects, including historic heritage, Otago Conservation Management Strategy, Tarras Community Plan</li> <li>• Viewing locations/ audiences bias towards highways/ local roads</li> <li>• omits conservation areas, public access tracks, river corridor</li> <li>• Led to underassessment of effects in scope and magnitude</li> <li>• Whether landscape effects can be offset requires further discussion</li> </ul> <p>Comment on MGL response re contextual material –</p> <ul style="list-style-type: none"> <li>• Assessment has little re reference nationally significant heritage landscape, does not demonstrate awareness of the Otago CMS, Tarras Community Plan, proposal to seek Dark Sky status or proposal for river cycle trail; does not recognise distinctive character of RAS valley, its landforms, heritage and journeying values in context of the mountain range or that part of the site is in SAL (and did not assess effects on SAL).</li> <li>• Contextual information in other technical reports should be understood and synthesised from landscape perspective – assessment does not demonstrate awareness of that information/ values in manner that supports reasoned effects assessment.</li> </ul>	Paragraphs [37] – [39]
Landscape context	<ul style="list-style-type: none"> <li>• Contextual analysis not sufficient in scope or detail for proposal of this scale, complexity and potential magnitude of effect</li> <li>• Focus on central western part of Dunstan Mountains overlooks broader context of wider Central Otago landscape with low development offering remote backcountry experience</li> <li>• Bendigo-Tarras Basin, including Mata Au Clutha River valley, also directly relevant as main “place” from which people experience the site</li> <li>• Documents that express local community values overlooked (Otago CMS, Tarras Community Plan)</li> <li>• Steven assessment identifies additional values, including of Bendigo-Tarras Basin, and character and values of SAL, and omissions from relevant viewing locations and audiences.</li> </ul>	Paragraphs [40] – [48]
Understanding of site and its values	<ul style="list-style-type: none"> <li>• Site analysis not sufficient in scope or detail for proposal of this scale, complexity and potential magnitude of effect commensurate with proposal</li> <li>• Omits information re heritage/ecology values and conservation covenant and relevant viewing locations and audiences, eg public conservation areas, public tracks and river corridor</li> <li>• Led to underestimation of visual effects</li> <li>• Steven undertook independent assessment of site values</li> </ul>	Paragraphs [49] – [62]

	<p>Comment on MGL response re viewing locations and audiences:</p> <ul style="list-style-type: none"> <li>• Visibility analysis does not capture full range of relevant viewpoints – only geographical bearings (but not viewpoints within those bearings)</li> <li>• Key issue is that all but two viewing locations were from roads and only one of the non-road simulations is a broader view of the site; by omitting the large number of conservation areas, public access track and river corridor areas, a large proportion of actual and potential viewing audience is omitted, resulting in a bias towards road views which are transitory and buffered from a inside a vehicle; does not capture backcountry experience at slower, contemplative and recreational pace.</li> <li>• Comparative analysis of the viewing experience between lost public routes (Thomson Gorge Road, RAS area, Shepherds valley road, track to Mt Moka) and experience during and post mining (e.g., Ardgrour Rise, track to CIT battery, reinstated RAS valley track) would provide clearer understanding of visual change.</li> </ul>	
Project visibility and effects	<ul style="list-style-type: none"> <li>• Important viewing locations and audiences omitted</li> <li>• Visibility of project at least moderate to high despite distance due to visual discordancy</li> <li>• Visual effect at least moderate to high with some very high effects in closer views from publicly accessible viewing points</li> <li>• Long term remediation would reduce visual effect in some respects, however large man-made landforms and open pits remain incongruent with moderate to high/very high visual effect</li> <li>• Visual effect of long term vegetation change uncertain due to experimental nature of rehabilitation</li> <li>• Visual simulations have limitations – photography and rendering of mine elements are flat and mine elements likely to be more visually apparent in real life; no simulations of Ardgrour Terrace/ night time.</li> </ul> <p>Comment on MGL response re viewing locations and audiences:</p> <ul style="list-style-type: none"> <li>• Visibility analysis does not capture full range of relevant viewpoints – only geographical bearings (but not viewpoints within those bearings)</li> <li>• Key issue is that all but two viewing locations were from roads and only one of the non-road simulations is a broader view of the site; by omitting the large number of conservation areas, public access track and river corridor areas, a large proportion of actual and potential viewing audience is omitted, resulting in a bias towards road views which are transitory and buffered from a inside a vehicle; does not capture backcountry experience at slower, contemplative and recreational pace.</li> <li>• Comparative analysis of the viewing experience between lost public routes (Thomson Gorge Road, RAS area, Shepherds valley road, track to Mt Moka) and experience during and post mining (e.g., Ardgrour Rise, track to CIT battery, reinstated RAS valley track) would provide clearer understanding of visual change.</li> </ul>	Paragraphs [65] – [84]

<p>Planning framework</p>	<ul style="list-style-type: none"> <li>Other relevant planning provisions include provisions relating to protection of indigenous biodiversity and habitat, landscape management of SAL as a “highly valued landscape” and protection of historic heritage.</li> </ul>	<p>Paragraphs [85] – [96].</p>
<p>Landscape effects assessment</p>	<ul style="list-style-type: none"> <li><u>Landscape character</u> – natural character reduced to low in central range but high over range as whole; effects on character significant rather than moderate, including some high effects; absence of overt development means “the first cut is the deepest” significant discordance landform elements constituting permanent change to landscape character post closure.</li> <li><u>Rural landscape amenity</u> – underestimated by assessment and inconsistent with description of visual effects; cumulative visual amenity effects will have high adverse effects during mining, including perspective of Bendigo-Tarras basin as a whole; remain at least moderate-high post closure.</li> <li><u>Back-country character</u> – permanent adverse effects (moderate to very high) on backcountry character and experience of site and surrounds; Ardour Rise not like-for-like experience.</li> <li><u>Significant Amenity Landscape (Bendigo Terrace)</u> – Moderate adverse effect on SAL during mining, reducing to very low post-closure.</li> <li><u>Protection of ONL</u> – Moderate to very high adverse effect; naturalness and other values of ONL not maintained during mining; return to outstanding level dependent on experimental rehabilitation, but not pre-mining quality.</li> <li><u>Preservation of natural character of streams and wetlands</u> - not preserved; adverse effects initially high during mining reducing to moderate to low/moderate post remediation.</li> </ul> <p>Comment on MGL response re visual amenity, dark sky, quietness:</p> <ul style="list-style-type: none"> <li>agree effects not uniform – magnitude of effect ranges from moderate to very high depending on degree of exposure to detracting elements and the experiential context, but will be light, movement, noise of new level and kind.</li> <li>agree mere visibility is not adverse effect; in this case, visibility constitutes adverse effects due to the context in an ONL.</li> </ul> <p>Comment on MGL response re natural character:</p> <ul style="list-style-type: none"> <li>consider adverse effect very high where the waterbody completely destroyed.</li> </ul>	<p>Paragraphs [102] – [176]</p>

	<p>Comment on MGL response re ONL:</p> <ul style="list-style-type: none"><li>• disagree that outstanding character of the range retained given severity of impact on a range of significant values; if assessed during mining, middle part of the range would be omitted; large enough scale to do so; would not be considered natural enough; would be so degraded there would be insufficient reason to support outstanding evaluation.</li><li>• central part of the range is focal area, not the least because it is only part that can be crossed by vehicle most of the year, where significant portion of the mining heritage located, and distinctive RAS valley landform.</li><li>• effects could be described as localised in the physical sense because of percentage of the footprint vs the area of the whole range and are contained by geography to a degree depending on viewpoint, however as dependence on these physical factors does not acknowledge more intimate connection people have with that part of range; contrary to MGL visibility assessment which identifies a wide range of places with views of site; not the case that viewing audience limited and the effects on values (such as heritage, and ecological values) small in scale, specific and inconsequential - there is a large and diverse viewing audience from a wide range of viewing locations, within/ adjacent to site.</li><li>• no overt development/no development of this type; all the other ranges have some development - the mine would fundamentally change this situation (the first cut is the deepest) and would permanently affect overall visual coherence of the range.</li><li>• scale, extent, type of permanently obvious change means ONL adversely affected and nationally significant values permanently lost; MGL not undertaken value by value analysis so not supporting reasoning to conclude the ONL would be maintained.</li></ul>	
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