

BEFORE THE FAST-TRACK EXPERT PANEL

IN THE MATTER of the Fast-track Approvals Act 2024 ("FTAA")

AND

IN THE MATTER of Bendigo-Ophir Gold Project (FTAA-2507-1089)

JOINT STATEMENT OF EXPERT WITNESSES:

RECONVENED LANDSCAPE ARCHITECTURE

8 June 2026

INTRODUCTION

1. Expert conferencing on the topic of landscape architecture took place online via Microsoft Teams from 9:00am-5:45pm on 18 May 2026; 8:30am-2:35pm on 27 May 2026; and 8:00am-9:15am on 28 May 2026, following which a Joint Witness Statement (“JWS”) was signed. To allow the experts to work through the remaining agenda items, conferencing was reconvened from 9.00am-2.15pm on 8 June 2026.
2. The conference was attended by the following experts:
 - (a) Rhys Girvan (“RG”) (Applicant);
 - (b) Nigel Parker (“NP”) (Otago Regional Council);
 - (c) Bridget Gilbert (“BG”) (Sustainable Tarras);
 - (d) Stephen Brown (“SB”) (Central Otago District Council);
 - (e) Anne Steven (“AS”) (Environmental Defence Society); and
 - (f) Dr Alayna Pakinui Ra (“APR”) (Kā Rūnaka).
3. Jason Welsh (ChanceryGreen) acted as independent facilitator.
4. Islay Fowler (ChanceryGreen) assisted the experts to draft the JWS.

CODE OF CONDUCT

5. The experts confirm that they have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and referred to in the Fast-track Approvals Act 2024: Panel Conveners’ Practice and Procedure Guidance 22 July 2025, and agree to comply with it. The experts confirm that the issues addressed in this JWS are within their area of expertise, unless stated otherwise.

SCOPE OF JWS

6. In Expert Panel Minute 8 (4 May 2026), the Panel directed experts in the topic of landscape architecture to conference on identified focus areas. The Panel also provided a supporting paper, “Expert Conferencing Questions – Landscape Architecture”, which outlines additional topic-specific detail. Minute 18 (12 May 2026) also addressed conferencing on landscape architecture. Annexure 1 of Minute 18 has formed the basis of the conferencing agenda.
7. As directed in Expert Panel Minute 18, the experts have had regard to the evidence of Ms Lucas and Mr Rough.

8. The agenda item numbering in this JWS follows the numbering used in the Landscape Architecture JWS dated 18, 27 and 28 May 2026.
9. In this JWS, we report the outcome of our discussions in relation to each item (below), including by reference to points of agreement, disagreement, and unresolved matters or uncertainties. Where we are not agreed in relation to any issue, we have set out the nature and basis of that disagreement.

AGENDA ITEMS

H. Will the Significant Amenity Landscape remain intact if consent were granted, both during the operational phase of the project and upon completion? Please confirm your understanding as to whether any permanent structures from the proposal will remain within the SAL, for example, the proposed electricity substation as an infrastructural element.

Operational Phase

10. The experts understand that during start-up and mining operation, infrastructure along the inner east edge of the delineated Bendigo Terrace SAL includes the Site Workers Camp (removed after the start-up phase), Geology Compound, Administration Buildings and substation / transformer. The magazine storage, emulsion yard and quarries are located outside the identified SAL. There will be set-down areas (during start-up) and new roading and associated parking and various visible human and vehicular activity. A new power line also enters this area from the northwest. A bore line has also been installed. Some of these elements are already present on the Site.
11. RG considers the proposal includes elements that will alter the character of this part of the Site during construction and operation; however he considers that it will not materially compromise the important landscape values of the Bendigo Terrace SAL. The SAL will retain its legible formative processes associated with glacial deposits, open rural character, and pattern of dispersed and generally well-integrated rural buildings and structures. Visual effects of aspects of the proposal located within the SAL will be relatively contained to the vicinity of the Site, with views in proximity of the Site effectively limited to a two-kilometre adjoining section of Thomson Gorge Road. Potential long-distance views will be from two private dwellings on the Bendigo Terrace, and transient glimpse views

from Kanuka Loop and over significant distances from the Pisa Range and Grandview Mountains.

12. RG has been involved and peer reviewed in the assessment of the Exploration Building as part of the early enabling works which have now been consented. This has ensured that the Exploration Building has been located to avoid breaching the Dunstan Mountains' skyline and is set against the backdrop of the foothills and terraces along the lower reach of Shepherds Creek. Materials and siting are chosen to blend with the landscape, with larger structures placed to the south to limit effects on the comparatively more open character to the north.
13. RG considers direct physical effects will be accommodated without materially compromising this contained area of SAL and adverse effects will be no more than low overall. Beyond this RG accepts some rural dwellings on Bendigo Terrace within this SAL may obtain views of parts of the mine within the adjoining ONL with up to moderate-high effects. Given this, RG acknowledges there would be some material perceptual effects but considers the essential landscape values for which the Bendigo Terrace is recognised as an SAL, particularly the highly legible terraced landforms would remain. RG considers parts of the SAL is affected during operation, but not to the point that its defining values are lost overall.
14. BG, APR, NP, SB and AS consider that this scale (including extent and layout) and character of development anticipated adjacent to and partially within the SAL during the operational phase, corresponds to what would normally be described as a 'rural industry' type landscape (or rural) character. The open and generally flat topography throughout the area means that this rural industry character will influence the character of much of the adjacent SAL.
15. AS understands that some of this activity is consented, therefore, the consideration of effects on landscape is a cumulative effect rather than only a direct effect.
16. In BG's experience of identifying and assessing amenity landscapes in Otago (e.g. Queenstown Lakes District, Clutha District) and elsewhere throughout the country (e.g. Tasman, Waitomo, Waipa, Thames Coromandel districts etc), areas in which rural industry type development of this scale and character is evident, do not qualify as amenity landscapes. For these reasons, it is BG's view that the existing SAL would fail to qualify as an amenity landscape during the operational phase of the project.

17. More specifically, BG, AS, APR, NP and SB consider the development in and adjacent the SAL would:
- (a) undermine the impression of openness that is characteristic of the area;
 - (b) shift the character from a rural landscape dominated by pastoral, viticultural and horticultural uses (or what can be described as a more traditional working rural landscape), to one that also includes obvious co-dominance by rural industry type uses;
 - (c) disrupt the natural dark sky environment of the area;
 - (d) disturb the impression of rural tranquillity and rural quiet (or 'rural backwater' character) associated with the area;
 - (e) detract from the more traditional working rural landscape scenic views afforded from the local road network;
 - (f) and collectively, as a consequence of the above, along with the visual, audible and spatial connection of the area with the central western part of the Dunstan Mountains ONL where the major mine operations are located (see discussion below in relation to the Completion Phase effects), transform the sense of place held by the community (as articulated in the Tarras Community Plan) from a more natural rural environment to one that is dominated by industrial scale mine activity and development.
 - (g) BG, AS, APR, NP and SB consider there would be a moderate adverse effect on the SAL due to the changes in the attributes and values described above.
18. RG accepts that there will be effects at the site scale (as explained above), however at the SAL scale, RG considers that the effects will be low.

Completion Phase

19. The experts understand that on completion, the Geology Compound and Administration Buildings will be removed, including foundations and will be re-established in plough-able pasture. The 66/11 kV transformer / high-voltage substation and associated 66 kV overhead network and are the only permanent infrastructure elements which would remain within the SAL. Some roading would remain within the SAL to access the water treatment plant and the boreline (underground).

20. RG and NP consider that the SAL landscape after closure will remain intact overall.
21. BG and AS agree that following completion and restoration of the disturbed areas in and adjacent the SAL, the residual elements (substation and transmission line) are very unlikely to be of a scale or character that precludes reconsideration of the area as SAL.
22. However, in BG's experience of amenity landscapes in Otago (e.g. QLDC, in which all of the non ONF/L rural zoned land has been confirmed by the Environment Court to qualify as an amenity landscape), the connection of the more working rural landscape area to the proximate ONF/L landscape context is a key factor in establishing amenity landscape values.
23. BG, SB and AS consider that the proximate visual and spatial relationship of the SAL to the enduring, highly engineered landform change of the ELFs and benched pit walls together with other modification of the terrace flats will inevitably compromise the amenity enjoyed from much of the (SAL) area. For this reason, BG, SB and AS consider that the area is unlikely to requalify as a SAL.
24. APR considers that the SAL cannot remain intact, as its values are not derived from visual or physical attributes in isolation, but from its relational function within the wider landscape system and its connection to whenua, people, and inherited pathways across the landscape.
25. APR also considers that the SAL sits within a broader network of whakapapa relationships, where the basin, the mountain sequence, waterways, and pathways such as ara tawhito are interconnected elements of a living landscape. These relationships are not abstract; they are expressed and maintained through hiko, as movement across the land, and through kōrero tuku iho, which embeds knowledge, memory, and identity within that landscape. The proposal fundamentally disrupts these interconnected threads.
26. In particular, APR considers that the severing and destruction of ara tawhito, as wāhi tīpuna, represents more than a physical loss of a pathway. It is a disruption to whakapapa connections and to the ability to move through, experience, and understand the landscape in a manner consistent with ancestral patterns of use and occupation. This directly affects not only the ONL, but also the SAL, which relies on its connection to these broader systems to sustain its values and meaning. It is her opinion that the assessment does not adequately recognise or assess these effects. Instead, it adopts an approach which separates landscape

into individual attributes and considers whether those attributes can be maintained or reinstated. Therefore, she considers that this approach is not consistent with TTatM, which is explicit that:

- (a) landscape arises through the interaction of physical, perceptual, and associative dimensions, alongside whakapapa, hīkoi and kōrero tuku iho,
- (b) landscapes do not readily fit rigid or prescribed methods,
- (c) and assessment must provide transparent and reasoned explanation of how relationships across the landscape are affected.

27. APR considers that by not assessing how whakapapa, hīkoi, and kōrero tuku iho are affected as interconnected dimensions of the landscape, the assessment materially underestimates the extent to which the SAL would be compromised. Furthermore, she considers that once these relationships are disrupted, particularly through the permanent alteration of landform and the severing of ara tawhito in perpetuity, the SAL cannot continue to function as it currently does, even if parts of it remain physically intact. Accordingly, she considers that the integrity of the SAL is compromised not only by direct physical effects, but by the loss of the relationships that bind the landscape together, and therefore it cannot be considered to remain intact.
28. NP considers the landscape values of the SAL will be affected during the temporary period during which the worker's camp is installed (understood to be 1-3 years) and during the period that the quarry and topsoil stockpiles will be operational adjacent to the SAL.
29. NP accepts and agrees with the commentary and degree of effect considered for the individual elements proposed within and beside the SAL by RG in his Substantive NCLEA assessment. NP agrees that landscape effects of the workers camp and associated buildings are relatively contained, with limited visual catchment and avoidance of physical effect to the distinctive glacial terraces of the area. NP also agrees with the assessment findings within the NCLEA Substantive report for the other elements on the plateau before the terrain rises into the Dunstan Mountains.
30. NP considers that the effects of elements should not only be considered individually but considered holistically. All elements, including those of the mining activities proposed in the Dunstan Mountains where facing or visible from the SAL area should also be considered to have influence.

31. It is noted that all experts agree that landscape effect during operation to the central western region of the Dunstan Mountains is significant and that the scale of this area is in relative proximity to the SAL.
32. NP considers that in addition, having regard to the industrial scale of traffic movement and general noise anticipated during operation, that the combined degree of effect to the SAL will at various times be greater than the individual elements. On balance, NP considers adverse perceptual landscape effect to the SAL area would be such that the SAL would **not** qualify during the period of operation as a SAL due to the industrial scale of movement, the proximity of the working open mines and the combined effect on rural tranquillity within the SAL. NP however considers that once operation ceases, the area would once again qualify as an SAL.

M. Do you agree that the objectives of the proposed site rehabilitation plan (in relation to landform rehabilitation, as set out below) are achievable, or are they too lofty and unachievable?

10.2.4. Create Diverse, Natural-Looking Surfaces

Goal: Create rehabilitated landscapes that mimic natural terrain through heterogeneous landforms with varied slopes, aspects, micro-topography and growing conditions

33. RG considers the rehabilitation objectives are appropriate insofar as they direct suitable landform rehabilitation within those parts of the DDF where adverse landscape effects can be realistically reduced. This includes ELFs, the TSF, haul roads, backfilled areas, stockpiles and other disturbed surfaces.
34. RG also acknowledges the goal of creating 'natural looking, heterogeneous landforms' cannot fully address pit lakes and permanent highwalls associated with RAS and SREX pits. Those features will remain part of the residual landscape effects at closure and should not be treated as being naturalised in the same way as rehabilitated ELFs or backfilled areas.
35. RG notes that where beneficial landform outcomes can occur within the Site, this has specifically been carried into consent conditions (C38 of Common Conditions) including "*to blend in as much as possible with the adjacent landforms*" relating to ELFs, to "*resemble the pre-mining landforms to the extent possible*" in relation to the backfilled CIT Open Pit and to "*recontour and distribute overburden to reflect the surrounding landform*" relating to Haul Roads. In

addition to landform modification, specific root zones are described in LERMP for TSF, ELF's and small areas of pit walls to ensure favourable conditions for plant growth.

36. BG, AS, APR and SB do not consider that the proposed site rehabilitation plan will achieve, diverse, natural looking and naturally functioning surfaces or landforms that mimic the natural terrain of the Site.
37. While BG, AS and SB acknowledge that localised micro-landform remodelling of the surfaces of the engineered landforms is proposed (including rock stacks (requirement understood to be 1 per hectare) and rubble pits (requirement understood to be 1 per 5ha), smoothing out the bench edges of slopes, scarification of benches, smoothing off the TSF dam crest, avoiding linear features, shallowing-off benches) and establishing sufficient depths of root zones to support rehabilitation with native vegetation; the sheer scale and fundamentally uniform structure and profile of the ELF's and pit walls means that their inherently engineered nature will permanently dominate their visual appearance and landscape character. This will form a bold contrast with the highly complex and naturally variable slope profiles of the surrounding undisturbed topography which, heightens the discordant nature of the permanent ELF and lake-filled pit landforms within this specific more natural landform setting. The ELF's would be fundamentally inverse to the natural landform they would occupy (ridge instead of valley, on a larger scale). They would also be devoid of natural rock outcrop and natural landslide topography. The TSF is a highly unnatural headwater large flat "hanging" valley floor which has no precedent in the Dunstan Mountains.
38. AS, BG and SB consider it is likely the large discordant landforms would remain apparent for some years after completion due to a predominant browntop grassland ground cover contrasting with the natural shrubland mosaic on adjoining undisturbed topography.
39. APR considers that the rehabilitation approach assumes landscape values can be reconstructed through creating a visually "natural-looking" surface. This reflects a misunderstanding of landscape as understood through the perspectives of Kā Rūnaka and Tātā Māori, where landscape is a living system of relationships, between landform, wai, people, and whakapapa, rather than a surface condition.
40. APR considers that this is particularly critical in relation to ara tawhito, where natural valleys, ridgelines, and landform patterns provide the legibility that guided tīpuna through hīkoi and are carried through kōrero tuku iho. The proposed

landform modification disrupts this legibility. Engineered landforms create a landscape that no longer reads as the natural terrain that originally guided those pathways. ARP therefore considers that a fundamental question for future generations arises: how does one follow or meaningfully re-experience an ancestral pathway where part of that landscape no longer resembles the whenua from which it was derived? For future generations, APR considers this results in more than a visual change, it alters the ability to navigate, understand, and connect with the landscape, effectively interrupting the relationship between movement, memory, and place.

41. Accordingly, APR considers that while visual softening may occur, the landscape would remain functionally and culturally altered, and would not support the same patterns of hīkoi or connection. This is largely a result of the proposed site rehabilitation plan insufficiently addressing the effects of permanently modified landform on mana whenua values.
42. NP notes, that the goal is to “mimic” natural terrain and that his understanding of that goal is not to recreate the exact natural terrain or falls as currently on site nor to remove all evidence of artificial interference but rather to considerably soften engineered forms. Noting this framing, NP considers that landform naturalisation will be successful. RG agrees.
43. NP considers that a considerable degree of success will be achieved through the proposed attempts to naturalise engineered and benched landforms. NP considers that such attempts if done thoroughly will have substantial visual benefit in removing artificial and noticeable horizontal benching. With effort and fine grading localised depressions and micro topography can be created to provide notable visual difference as opposed to a monotonous engineered landform. NP notes that the above opinion does not refer to the Rise and Shine Pit where he considers the proposed mitigation to the edges of the pit benches will, whilst beneficial, have limited effect. RG agrees.
44. NP recommends that to ensure the appropriate level of detail and refinement is achieved for the landforms and for all proposed elements of the LEMP, detailed landscape and levels plans are submitted to the relevant authority for written approval prior to commencement of construction.
45. RG supports certification of final landforms to ensure the intended rehabilitation outcomes are achieved. However, because landform modification will occur progressively over the life of the mine, RG considers certification would be most

effective before final surfacing and topsoiling, while landforms can still be practically adjusted.

- 46. NP considers that to address the growing conditions section of the question, vegetative cover will also have an effect in determining the final visual appearance and success of the extent artificial landforms are disguised.
- 47. RG, AS, and SB agree with NP that vegetation establishment will be important to the final visual appearance of rehabilitated landforms. The success of revegetation will influence the extent to which artificial landforms are visually softened and integrated with the surrounding landscape over time. BG agrees in principle with the first line of this paragraph.

O. Are there any potential alternative scenarios for the design of proposed landform modification that you can suggest, based on your experience with other similar projects, which could, for example, achieve a more natural finished landform and avoid an obvious human-made 'artificial' form? This relates to all landform modification, including the proposed benched pit landforms and lakes, which are currently proposed to remain in the landscape in perpetuity.

- 48. RG accepts that, in broad landscape terms, alternative scenarios could theoretically produce less artificial finished landforms. These could include reducing the scale of open-cast mining, greater backfilling of pits, reducing the volume of external waste landforms, relocating waste rock to landforms with a more depositional character, or limiting extraction to underground mining. However, RG understands that those options would involve a materially different mining method, staging sequence, material balance, operational footprint, or project yield. They are therefore not simply refinements to the proposed landform design, but alternative project scenarios.
- 49. RG considers that within the currently proposed mining method and identified resource, the project layout has been informed by landscape considerations, including containment within the Rise and Shine Creek and Shepherds Creek catchments, skyline retention, progressive rehabilitation and integration within adjacent landform patterns to assist with containment and reduce the severity of adverse visual effects beyond the Site. While the CIT Pit will be backfilled to remedy significant adverse effects, RG accepts there is limited further ability to reduce the modified forms of the RAS as an open cast mine and has investigated opportunities for this during the initial design of the project.

50. RG considers there is further opportunity to rehabilitate the benches in SRX ELF and partial backfilling of SRX Open Pit which has yet to be explored in detail and may further reduce adverse effects. More generally RG acknowledges that further refinement is a necessary part of mine operation and closure to reduce artificiality, including softening benches, rounding crests, reducing gradients of batters, rehabilitating haul roads and improving surface texture and revegetation outcomes. Accordingly, these outcomes are specifically addressed in consent condition (Common Condition C38 described above). RG considers that if SRX was backfilled in its entirety it would reduce adverse effects.
51. RG acknowledges any further refinement would need to be tested against operational, geotechnical, hydrological, safety and rehabilitation constraints. In his opinion, the most realistic remaining opportunity is to reduce the obvious artificiality of rehabilitated landforms where practicable and ensure the final forms are as integrated as possible with the surrounding landscape.
52. AS and BG have no experience of successfully creating new landforms of this scale and with expectations of a “natural” appearance blending into ambient highly natural topography in an ONL rangeland of this type.
53. AS, SB, NP, APR and BG (and RG, in respect of matters (a)-(b) inclusive) consider alternatives might include:
- (a) limiting mining to underground mining only and sequentially backfilling the voids with the waste to avoid the need to create such landforms;
 - (b) backfilling the pits (which might need to be smaller to be stable), and would require a different staging of works, and a different approach to working the pits;
 - (c) significantly limiting the scale of the landforms so the final forms are more incidental than dominating, and build on existing landform (i.e. ridge on existing natural rise or undulation rather than infilling a large natural gully);
 - (d) placing waste on the adjoining basin floor where natural landforms are large-scale and depositional in nature and tend to have smooth surfaces meaning that it would be relatively easy to mimic their form. Moreover, they can be re-vegetated in simple pasture cover which can be easily achieved, blends well with the ambient topography and vegetation cover and returns them to practical use within a very short time. This would involve more vehicle

movements and potentially noise and dust out in the basin, but essentially those effects are the same effects transferred from the rangeland.

54. The experts wish to make it clear that they have not undertaken any assessment of the actual effects of any of the scenarios above.
55. In considering this question, BG is aware that other goldmines of this sort of scale, such as the Waihi and Macraes mines, have been, and continue to be, expanded. This practical outcome suggests that back filling of the RAS Pit and SRex Pit is very unlikely to happen, even if it were a practicably viable option (ie sufficient backfill material available). For the same reasons, allowing the RAS Pit and SRex Pit to fill with water may also be an uncertain outcome.
56. BG and AS consider that this also means that at least some of the landscape benefits anticipated at closure may not be realised for a very long time and that the significant level of effects associated with the operational phase of the mine may endure for a considerably longer period than is currently anticipated.
57. APR considers that TTatM requires assessment to move beyond prescriptive or reductionist methods and instead provide transparent and reasoned explanation of how a proposal interacts with the landscape as a whole. She notes that the difficulty in identifying alternative landform scenarios arises because the assessment framework is focused on refining components of the proposal, rather than interrogating the appropriateness of the proposal as a whole within this landscape.
58. APR considers that when the landscape is understood as interconnected whenua, the question is not whether landform design can be improved, but whether the scale and nature of modification can sit within, or be reconciled with, that landscape. In landscapes of a larger scale, and with a great absorption capacity for industrial scale mining, modifications can be made to accommodate changes to slope batter and the creation of more naturally undulating landforms. However, the constrained nature of this valley and the unique character, shapes and forms of this particular landscape make the creation of sympathetic landform modifications limited.
59. NP and APR suggest that the single biggest difference to landform modification would be achieved by not opening the Rise and Shine pit and conducting gold extraction via underground mining.

P. How confident are you that the proposed long-term rehabilitation of the site (as proposed via the Landscape and Ecological Rehabilitation Management Plan – LERMP) can be achieved? What are the risks that you see in achieving a successful landscape outcome, based on your experience with similar projects, and what measures (management responsibilities, land ownership, funding and/or the expertise and regulatory power of council compliance officers) are critical to ensuring such a result. Do you anticipate a particular land use activity would be preferable to continue on the site into the future, upon the completion of the mining works?

60. RG has reasonable confidence that the proposed long-term rehabilitation of the site (as proposed via the Landscape and Ecological Rehabilitation Management Plan – LERMP) can be achieved.
61. RG has worked collaboratively with Dr Robyn Simcock (Manaaki Whenua Landcare Research) and Mr Barber (Habitat NZ) and considers this significant level of specific mine restoration experience provides a sound basis to implement workable measures that can materially reduce adverse landscape effects over time. This accepts that it will not restore the pre-mining landscape to a single pre-degradation state and that dryland revegetation involves inherent uncertainty.
62. RG understands that key risks to achieving successful long-term landscape outcomes include fire, weed invasion, browsing pressure and incompatible land management on adjoining areas. These have been specifically identified and addressed in the LERMP alongside G.10 Mammalian Pest Management Plan and G.11 Biosecurity and Plant Pest Management Plan and address matters beyond RG's specific areas of expertise.
63. In RG's experience, the greatest risk is the gap between the consented landscape concept and what is actually built, maintained and governed over time. A successful outcome depends on enforceable conditions, specific hold points, secure funding, clear long-term land management responsibility, and compliance officers being supported by independent landscape and ecological expertise. Without those things, the rehabilitation could still occur, but it may not achieve landscape integration, naturalness and durability to the extent possible.
64. RG considers the preferable long-term land use is conservation / regeneration with managed public recreation access. Limited pastoral or operational uses may

be appropriate only where they are compatible with rehabilitation, covenant / protection outcomes, ecological management and public access.

65. All experts acknowledge that whilst measures (management responsibilities, land ownership, funding and/or the expertise and regulatory power of council compliance officers) are important matters, they have not had sufficient time to consider these matters.
66. All experts are aware of some of the issues highlighted in the two Ecology – Terrestrial Vegetation JWSs.¹
67. BG and AS specifically refer to the following aspects of those JWSs:
 - (a) all of the ecologists agree that there are no successful examples of similar dryland ecosystem creation (First Ecology – Terrestrial Vegetation JWS dated 25 May 2026, at [47]);
 - (b) the majority of the ecologists have low confidence that the earthworks engineered surfaces can be rehabilitated to a naturally functioning dryland ecosystem (ibid, at [48]);
 - (c) all of the ecologists agree that there is little experience with and there will be difficulty in propagation of the rarer plant species, including but not limited to, spring annuals (Second Ecology – Terrestrial Vegetation JWS dated 2 & 3 June 2026, at [15]);
 - (d) all of the ecologists consider that much of the offsetting, restoration and habitat enhancement is experimental, going on to comment that the Management Plans and AEE rely on restoration/enhancement in a difficult dryland environment where restoration methods have not been well established and also rely on natural regeneration that is not a given and will require intensive management (ibid, at [22]);
 - (e) the majority of the ecologists consider the current risk failure, or not achieving anticipated beneficial ecological outcomes is high (ibid, at [23]);
 - (f) many of the ecologists have low confidence that taramea herbfield and shrubland can be restored and enhanced (ibid, at [33]);
 - (g) all of ecologists acknowledge that there is uncertainty that the tussockland habitat will be enhanced considering the limited understanding of

¹ Dated 25 May 2026, and dated 2 & 3 June 2026 respectively.

tussockland character and resilience at the restoration sites; the uncertainty of the majority of the ecologists that the wetland systems will be similar in character to those lost; and concerns with respect to the ability to achieve long term rehabilitation outcomes beyond 35 years (ibid, at [61]).

68. AS notes that, in referencing the two Ecology – Terrestrial Vegetation JWSs, the ecological experts agree that restoring dryland cushion/herbfield communities is unprecedented at this scale and in this kind of environment (i.e. it is completely experimental). This is important as these communities are a major component of the site's vegetation and are highly characteristic of the site and wider landscape. They also have very high ecological values considered significant at regional and national level.

Risk in achieving a successful landscape outcome

69. Including for the following reasons, BG and AS have a low level of confidence that the proposed long-term rehabilitation of the site can be achieved.
70. BG, AS and APR consider, relying on their experience of working with plant supply nurseries, and planting contractors and ecologists in the Otago region, and factoring in the advice in the Ecology – Terrestrial Vegetation JWSs, that the following risks are likely:
- (a) Plant procurement – a number of species have never been propagated commercially or are not typically available especially in large numbers; it is possible some may not be able to be propagated at all or in the numbers required, at least not without many years of experimentation and research; the number of plants required would be excessive and would very likely challenge the capability of nurseries; there may be flow-on effects of nurseries being unable to supply other projects.
 - (b) It is not possible to recreate the complex above and below ground biota-soil-water relationships naturally present including fungi and lichens. Restored and replanted land would be a poor proxy for the existing naturally occurring ecosystems at least for a period of most likely decades.
 - (c) Poor plant establishment rates due to the difficult and extremely challenging growing environment of the area, potentially compounded by the experimental nature of some of the proposed planting typologies. This would most likely require experimentation in establishment techniques which may take many years (for example, as was undertaken for the Northern Gateway

restoration planting which traverses an area of high ecological value north of Auckland).

- (d) Consequential weed invasion, being the main threat where ground is disturbed.
 - (e) The sheer scale of planting and ongoing maintenance to promote survival and growth, unless there is a dedicated long-term workforce.
 - (f) The presence of feral goats, deer, rabbits, hares etc which would require deer/rabbit fencing to exclude and intensive pest control over large areas and constant monitoring for incursions.
71. SB acknowledges the concerns that have been raised but has not had sufficient experience with revegetation projects in Central Otago to be confident about all of these concerns.
72. APR considers that confidence in the success of long-term rehabilitation is limited, not only because of ecological and physical uncertainties, but because of a more fundamental issue regarding how success is defined. She notes that the rehabilitation strategy assumes that if individual elements, such as vegetation, landform, or visual appearance, are addressed, an acceptable landscape outcome will be achieved. However, this reflects a component-based logic that is inconsistent with TTatM.
73. APR considers that Te Tangi a te Manu requires landscape assessment to demonstrate, through transparent and reasoned explanation, how the interaction of all landscape dimensions will be restored or maintained. She considers that in this case, there is no clear explanation as to how the relationships between whenua, wai, people, and experience could be re-established, particularly for Kā Runaka. And further considers that the lack of clear explanation of this aspect is likely due to the reality that these relationships cannot in fact be re-established, due to the in-perpetuity destruction of a wāhi tīpuna.
74. Therefore, it is APR's opinion that the most significant risk is therefore not only that vegetation may fail or landforms may remain visually artificial, but that the relationships that define the landscape, including ara tawhito, cultural connection, and experiential engagement, are permanently severed and cannot be restored.
75. NP notes that based on previous general experience establishing differing revegetation types in exposed and high-altitude locations he considers that some

of the rehabilitation vegetation works could be achieved. However, the difficulty and effort involved in success across the full spectrum of the plan should not be underestimated with multiple attempts, differing methodologies and approaches likely to be necessary to achieve continuous cover. Success, if achieved, will be delivered through perseverance and may consist of a different species make-up compared to the current proposals.

76. NP considers that success rates of planting rehabilitation will differ widely depending on micro-climates and proposed species across the site. Some areas and species will likely have good initial strike rates while others may prove particularly difficult to grow. NP notes the reservations of the ecologists in their JWS and their comments with regard the experimental nature of certain methodologies particularly of the cushion fields. NP has no experience in establishing cushion fields.

Critical Measures

77. The experts have not had sufficient time to address this matter given its complex and multifaceted nature.

Future land uses

78. The experts refer to their response to **Question U** below.

Q. Are the proposed conditions (for all relevant approvals / consents which have the purpose of ensuring that adverse landscape, visual and natural character effects will be avoided, remedied or mitigated) fit for purpose, if consent were granted? Are there any amendments you would suggest, or additional conditions required, based on your experience with similar proposals?

79. The experts understand that the relevant conditions are the 17 April 2026 version.
80. RG considers the proposed conditions provide a substantive framework for managing adverse landscape, visual and natural character effects, provided they are implemented with sufficient technical oversight and enforceable hold points. In particular, RG supports the ongoing involvement of tangata whenua under Common Conditions C23–C27, and the involvement of a suitably qualified landscape architect in monitoring and reporting on activities addressed through the LERMP under Common Conditions C44 and C45.

81. In RG's opinion, a critical issue is ensuring that identified closure and rehabilitation outcomes are translated into detailed, staged and workable plans. This includes the location and shaping of rehabilitation within the DDF and adjoining Mine Regeneration Zones encompassing habitat enhancement, final contours, landform transitions, rock-stack placement, surface roughening, haul road rehabilitation, final surfacing, topsoiling and revegetation. Conditions should ensure these matters are reviewed at the point when the landforms can still be practically adjusted, rather than only after they have been completed.
82. BG has only had the chance to review the conditions at a very high level due to time constraints.
83. BG does not consider that the proposed conditions are fit for purpose as they rely on rehabilitation methods to address the LERMP objectives that are experimental, untested and/or uncertain as explained in response to Question P above.
84. BG also considers that many of the LERMP objectives are unhelpfully vague and are likely to be difficult for the certifier to interpret. For example, the following objectives:
- (a) Recognise and protect backdrop and skyline integrity when shaping mine elements within the context of an ONL;
 - (b) Ensure rehabilitated and closure landforms (including habitat rock stacks) remain responsive to the underlying ONL context;
 - (c) Provide for wetland and riparian values;
 - (d) Requiring landforms to blend in with existing surrounding topography "as much as possible".
85. Referencing the Planning JWS, BG understands that the planners agree that the conditions need to specify the measurable environmental outcomes to be achieved (First Planning JWS, para 20). The planners set out a series of 'tests' that the conditions should be reviewed against (ibid, para 63). BG considers that this review should include the landscape related conditions and expects that such a review will entail thorough testing applying an iterative, top-down and bottom-up review.
86. In light of BG's earlier comments with respect to the trend for mines of this scale and nature to expand over time, along with the applicant's reliance on the Closure

Plan and long term rehabilitation of the site to mitigate landscape related effects, BG considers that should the Panel be minded to grant consent, one potential addition may be to include a consent condition that explicitly restricts the goldmining activity to the consented development only. As an example, this sort of condition is, frequently applied to rural living development in high value landscape settings where there is high development pressure (e.g. QLD s76(b) and s7(c) landscapes) via a Building Restriction Area, an accepted method to assist with providing certainty in managing landscape effects more generally, and also potential cumulative effects.

87. BG further suggests that given the applicant's reliance on the Closure Plan being delivered within a specified timeframe (30 years) to manage landscape (and other) effects, it may be appropriate that timeframes for rehabilitation should be explicitly referenced in the consent conditions.
88. APR considers that a direct exercise would need to be undertaken with Kā Rūnaka and the Applicant to discuss such matters of conditions and management plans.
89. AS has not explicitly reviewed the proposed conditions due to time constraints but has set out matters that need to be considered in drafting conditions should consent be granted in her evidence at para 176 of her Statement of Evidence.
90. NP considers that if the LERMP is successfully implemented then all that could be done on site, would be done on site to rehabilitate the landscape. However, NP considers this would not provide an acceptable package to remove adverse landscape effect. NP notes that regardless of the success or otherwise of the LERMP High adverse landscape effect would remain on the site and for this reason considers that the LERMP if successful remains insufficient in its scope.
91. NP considers that to offer the best chance of the LERMP being successful, detailed professionally prepared plans and specifications for each Land Management Unit must be prepared for approval by the relevant authority prior to implementation. NP also considers conditions must include defined standards of success, including defined coverage areas. Conditions must also be written in such a way to ensure ongoing efforts are embedded, including full renewal of methodological processes to start again if necessary.
92. SB, although not having reviewed the latest conditions, notes that he had material concerns regarding the version of conditions when his Statement of Evidence

was prepared. These included concerns in relation to site rehabilitation and night-time effects.

R. Can remaining adverse landscape effects (which are not avoided, remedied, mitigated) be offset/compensated, or is this particular RMA concept/construct only available when considering adverse ecological effects? Do you have any experience with other projects where offsetting of adverse landscape, natural character and/or visual effects has occurred? If offsetting is an available tool, how would that work and what could be proposed for this particular project?

93. RG consider that landscape offsetting cannot be applied mechanistically or quantitatively in the same way as ecological effects. In RG's experience, compensatory landscape measures are sometimes proposed or accepted as part of broader mitigation / enhancement packages, particularly where they provide additional public access, restoration, revegetation, interpretation, legal protection or long-term management.
94. SB and BG consider that the adverse effects of the proposed mine would be significant, particularly in relation to the landforms of the Dunstan Mountain ONL in that they cannot be offset or compensated for.
95. The experts note that there is no methodology for offsetting/compensation in TTaTM.
96. BG's view is that in the case of adverse landscape effects associated with the BOGP, this relates to the transformation of an area of ONL to land that would not qualify as ONL in terms of 'naturalness', let alone 'outstanding-ness'. Therefore 'no net loss and preferably a net gain' would require creating a new ONL somewhere else that displays the same rich layering of landscape values as is evident on the site (including a distinctive mix of location specific landforms, ecological values, mana whenua values, heritage values, recreational values and scenic values). BG and AS do not consider that such an outcome is feasible.
97. AS's view is that it is not possible to "compensate" for residual adverse landscape effects, at least of the nature associated with this proposal, as landscape values are inherently place-based with intangible values inextricably tied to place. Moreover, demonstrating a like-for like value would be inherently difficult to achieve with landscape values. Such measures would also necessarily involve

complex consultation and agreement of tangata whenua, whole communities and various interest groups/entities.

98. AS further considers that offsetting and compensation is antithetical to all statutory provisions which require the protection and maintenance or enhancement of landscape values.
99. NP acknowledges the limitation of compensating landscape effects, but is of the opinion that a suitably designed compensation that is specific to landscape values could 'balance the books' more effectively than proposing nothing further than the LERMP were the application to be granted consent. NP has suggested the offsetting of 65 ha area (equivalent to the area of the Rise and Shine Pit). Beneficial outcomes to landscapes in other areas could be achieved, providing positive effect to benefit both the nominated landscape area and the local community surrounding the nominated area.

S. Please provide a comparative summary of your assessment findings in a table², against each of the relevant landscape effects related topics, including adverse effects on natural character, adverse visual effects and adverse effects on identified landscape character and values, so that it is clear where there are differences between your expert assessment findings. You may wish to elaborate on these findings by providing additional reasons to explain your conclusions.

100. **Appendix A** is a diagram showing the four scales the experts agreed in their previous Landscape JWS at which landscape effects have been assessed.
101. The experts' comparative findings are set out in **Appendix B**. This includes clarification of effects in terms of the identified assessment scales including the Tarras Bendigo Basin and the addition of effects in the central western focus area of the Dunstan Mountains as refined through conferencing. The tables include visual effects and natural character effects.
102. The experts have agreed the important landscape values of the Dunstan Mountains ONL in response to Question D.
103. Drawing from BG's s53 landscape comments, she considers that the proposal will adversely impact landscape values in the following ways:

² Noting that Mr Girvan has attempted to prepare such a table at Appendix A to his 17 April 2026 Statement of Evidence.

- (a) As a consequence of the extent, scale, and character of landform and hydrological changes, the underlying geology and geomorphology of the landform which is an important feature of this landscape. Schist tors, the gradual movement of soil at higher elevations (solifluction), and intricate network of streams and creeks form legible characteristics which express their formative processes and are highly expressive of the landscape's formative glacial, tectonic, and fluvial processes.
- (b) As a consequence of the irreversible changes to the physical and perceptual values of the site, the Ara Tawhito, as Wāhi Tīpuna and traditional travel routes for Hīkoi, which exist at the intersection of Physical and Perceptual dimensions and cross directly through the Application site.
- (c) As a consequence of the extent, scale, and character of the physical and perceptual changes to the site, the landscape and scenic values (including the landscape, historic gold mine features and silver tussock grassland) of priority protection areas under the Bendigo Conservation Covenant.
- (d) As a consequence of the adverse visual amenity effects of the development: the highly appealing and engaging views to the cohesive mountain sequence from SH6, SH8, Conservation land and Reserve areas, Thomsons Gorge Road and the surrounding low-lying areas (including parts of the Mata-Au Clutha River corridor), in which the distinctive sculptural structure of the landforms and mottled vegetation patterns, combined with the big-sky landscape and planar river terraces associated with the Upper Clutha Valley, makes them highly memorable. At a finer grain, views of heritage elements, patterns and connections add to the appeal.
- (e) As a consequence of the industrial scale/character and prominence of the development: the high naturalness values as a consequence of a general lack of visible structures and modifications which ensures the landform remains largely open and is perceived as natural, with some relatively small-scale, more localised and limited evidence of gold mining amongst a broader coherent and open mountain backdrop.
- (f) Potentially, if the proposed vegetation rehabilitation strategies are unsuccessful, the irregular patterning and proliferation of grey shrubland, exposed rock faces, and scrub in places, which adds to the perception of naturalness.

- (g) As a consequence of the industrial scale activity and night-time lighting components of the development, the impressions of rural tranquillity and remoteness as a consequence of the (existing) very limited level of development.
- (h) As a consequence of the industrial scale activity and night-time lighting components of the development, the distinctive and highly legible dark night sky environment as a consequence of the (existing) very limited level of development within the ONL and local area.
- (i) As a consequence of the loss of heritage landscape features, patterns and connections, the highly accessible and extensive, legible network of identified heritage buildings and features along with tracks, water races, and the like, that collectively form a rich and complex heritage landscape throughout the Thomsons Gorge Road area (including the Rise and Shine Creek, Bendigo Creek, and the Aurora Creek catchments). Other noteworthy concentrations of heritage features in the ONL are evident in and around the Bendigo Historic Reserve. As a group, these features connect with the cluster of makeshift towns at the height of gold mining activity near the ONL, including Logantown, Welshtown, and Wakefield, where building remnants are evident today.
- (j) As a consequence of the transformative changes in relation to physical, perceptual and associative values, the identity of the Dunstan Mountains as a cohesive, largely undeveloped, and stunning mountain sequence that provides a highly memorable backdrop to Tarras and the surrounding rural river terraces, that is highly valued by the local community and makes an important contribution to their identity and sense of place.
- (k) As a consequence of the transformative changes in relation to physical, perceptual and associative values, the inspirational qualities of the Dunstan Mountains (including Thomsons Gorge) for a wide range of artists.

104. In considering this question, BG has also thought about other parts of the country where mining of this scale and nature has been deemed appropriate from a landscape effects perspective. It is her understanding that, some or all of the following characteristics tend to apply:

- (a) Mine is located outside an ONL (eg Macraes);

- (b) Mine is undergrounded where it coincides with an area of high landscape value (e.g. Reefton, Waihi North expansion area); and
 - (c) Mining is set within a comprehensive bush dominated context that serves to mask over at least some of the larger scale disturbance effects in time (much of the west coast mine areas).
105. In BG's opinion none of these characteristics apply to the proposed mine. Further the 'raw baldness' of the Dunstan Mountains along with the extremely challenging climatic conditions and location specific mana whenua, ecological and heritage values make it a particularly unforgiving canvas for absorbing mine development of this scale and nature.
106. RG and NP record that they have considered the effects on values, but have not teased out how they are individually affected, nor had the opportunity to discuss in conferencing.
107. AS has addressed every value identified in her table at Appendix 7 of her Statement of Evidence.
108. All experts agree that the experts' differences are not primarily about whether important landscape values exist. The differences relate to the weighting of those values, the way effects on those values are evaluated across nested scales, the significance attributed to permanent physical and associative change, and the extent to which project shaping, containment, rehabilitation and closure measures reduce adverse effects over time.
109. APR makes the following comments regarding her rating of effects at the four scales:
- (a) *Broad Landscape Scale Effects:* Matakinui has longstanding significance for Kā Rūnaka. Whilst the 'Dunstan Mountains ONL' exists as a defined boundary for the purposes of this assessment, it cannot be viewed in isolation from its inherent connection to the surrounding wāhi tīpuna, ara, wai/puna (waterbodies) and puke (hills) that it sits alongside.
 - (b) *Assessment of Bendigo Tarras Basin:* The Application results in in-perpetuity severance of the ara tawhito, where the route that traverses from the east (Manuherekia) will become severed from the eastern boundary of the Bendigo Tarras Basin to the north western edge of the Central Western Dunstan Mountains boundary. This severs the connection from which the ara crosses

down from Matakinui (Dunstan Mountains) into the Mata-au basin to access several significant mahika kai sites. This includes Kā-iwi-a-te weka/Kā iwi o te weka and Ko-te-koareare-a-te-pahi, both of which are noted in publicly available rūnaka information and require consideration in this assessment of effects. This route from Manuherekia further connected tīpuna directly through to the significant permanent fortified pā site of Te Rua Tūpāpaku within the Bendigo Tarras basin boundary, which would no longer be afforded as a result of the Application. The significance of the ara tawhito's connection to this pā is documented in publicly available QLDC information and requires consideration in this assessment of effects.

- (c) *Assessment of Central Western Dunstan Mountains:* The Application results in significant physical, perceptual and associative effects on mana whenua values, wāhi tīpuna and ara tawhito, all of which are unmitigable and occur in perpetuity.
- (d) *Assessment of Site Scale Landscape Effects:* At a site level, the Application results in-perpetuity decimation of Kā Rūnaka rights and interests, through the destruction a physical ara tāwhito, wāhi tīpuna, mahika kai gathering areas, and access/use of taoka species (both flora and fauna). These effects are primarily physical, and have subsequent perceptual and associative effects in perpetuity.

T. Confirming relevant statutory and strategic instruments and whether proposal consistent with these

- 110. The experts did not have sufficient time to address this question but note that the various statements of evidence from the planners have addressed this question.

U. Long term land uses

- 111. The experts refer to their answer to agenda **item O** above.
- 112. In addition, all experts consider that the proposal to prioritise ecological recovery over pastoral use is appropriate. It is an end use that would be consistent with a number of statutory provisions and non-statutory strategy visions and goals per se. Opening up of the land to a network of public recreational access in the longer term would improve the outcome. On-going pastoral use (sheep only to protect

waterways) as a secondary use on the rangeland to support ecological recovery is also appropriate.

V. Effectiveness of proposed measures to address effects on landscape values

113. The experts did not have sufficient time to specifically address this question, but note that they have addressed aspects of this question throughout the two JWSs.

SIGNATURES OF EXPERTS



Rhys Girvan



Dr Alayna Pakinui Ra



Nigel Parker



Bridget Gilbert

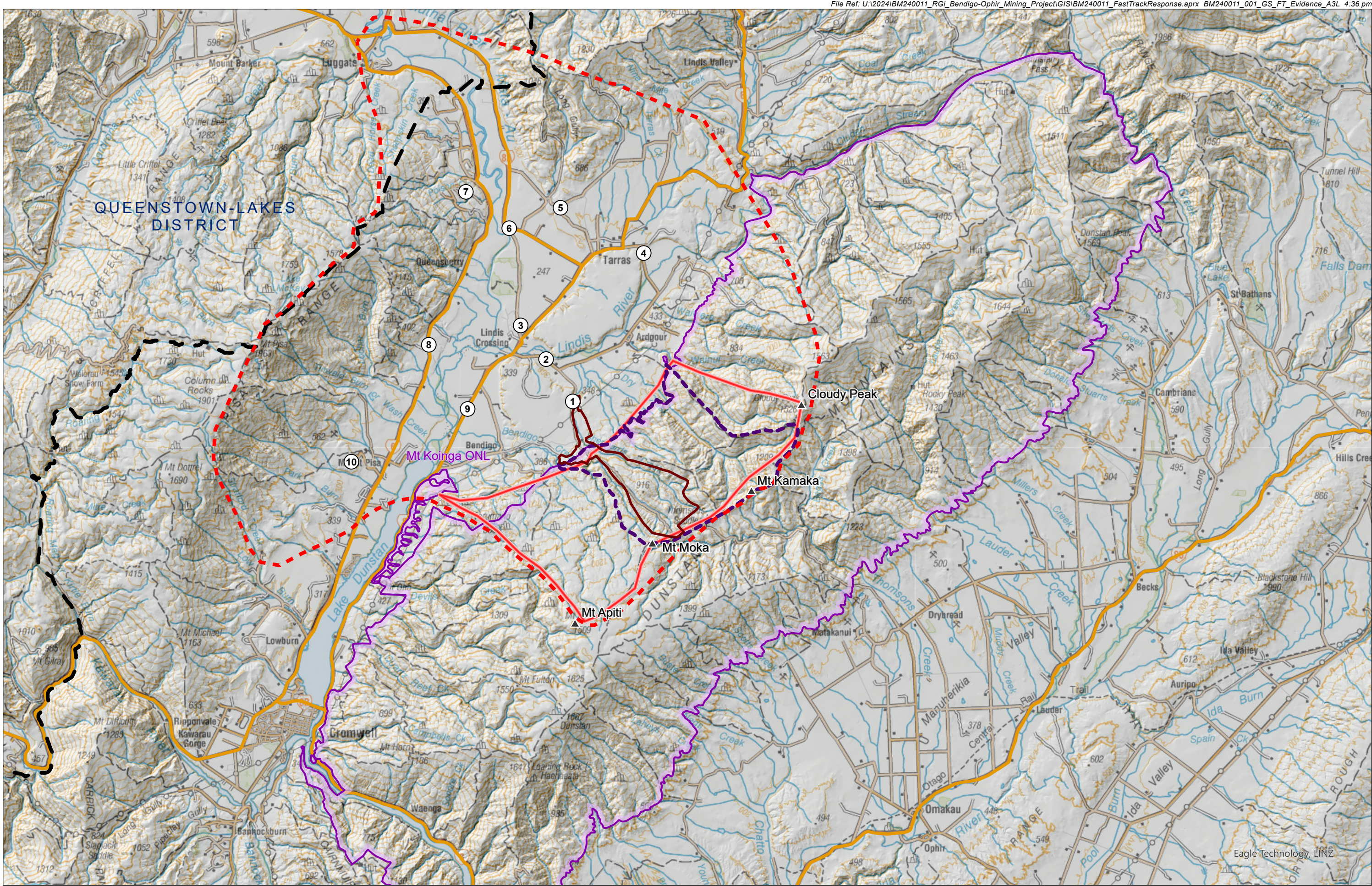


Elizabeth Steven



Stephen Brown

APPENDIX A



APPENDIX B

Table 1

Table 1: Landscape Effects (maximum)																		
Significant Effects (High/Very High)	MGL (Rhys Girvan)			CODC (Stephen Brown)			ORC (Nigel Parker)			EDS (Anne Steven)			Sustainable Tarras (Bridget Gilbert)			Kā Rūnaka (Alayna Rā)		
	Level + Nature of Effect (Adverse)			Level + Nature of Effect (Adverse)			Level + Nature of Effect (Adverse)			Level + Nature of Effect (Adverse)			Level + Nature of Effect (Adverse)			Level + Nature of Effect (Adverse)		
	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)
a. Broad Landscape Scale Effects (Dunstan Mountains ONL)	Moderate	Moderate	Low-Moderate	Moderate-High	High	High	Moderate	Moderate	Low Moderate	Very High	Very High	Very High	Moderate-High	High	High	High	High	High
b. Bendigo Tarras Basin	Moderate	Moderate-High	Moderate	Moderate - high	Very high	High	Moderate	Moderate-High	Moderate - high	Very High	Very High	Very High	Moderate-high	Very high	Very High	Very high	Very high	Very high
c. Central Western Dunstan Mountains	High	High	High	High	Very high	High	High	High	High	Very high	Very high	Very high	High	Very high	Very High	Very High	Very High	Very High
d. Site Scale Landscape Effects	High	High	High	High	Very high	High	High	High	High	Very High	Very High	Very High	High	Very high	Very High	Very High	Very High	Very High

All experts clarify that Table 1 records the “maximum” level of effect assessed by each expert. In reality, all experts recorded a range of effects ratings at each scale and at each time period. The real difference between expert opinion as to effects emerges in relation to the highest ratings that each expert has attributed.

All experts clarify that Table 1 encompasses the three different dimensions of landscape (applying the te ao māori and te ao pakeha perspectives) that TTatM expects be addressed in relation to any landscape assessment, together with the four contextual scales agreed amongst the experts.

All experts wish to clarify that the results above miss out on the nuances of the effects at each scale.

All of the experts have considered the visual simulations and viewpoint analysis in their landscape effects assessment above.

Table 2

It is noted that Table 2 has been prepared by RG and was included in his statement in evidence in response to s53 comments.

The experts note that they have not had sufficient time to review Table 2.

Table 2: Visual Effects															
Significant Effects (High/Very High)	BML (Rhys Girvan)			CODC (Stephen Brown)			ORC (Nigel Parker)			EDS (Anne Steven)			Sustainable Tarras (Bridget Gilbert)		
	Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect Rehabilitation planting 1 = successful 2 = unsuccessful		
Visual Effects	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)
VS1: Thomson Gorge Road	Very Low adverse (Residential + private viewpoints)	Low Moderate adverse (Residential + private viewpoints)	Low adverse (Residential + private viewpoints)	Low adverse	Low Moderate adverse	Low adverse	Very Low adverse (Residential + private viewpoints)	Low Moderate adverse (Residential + private viewpoints)	Low adverse (Residential + private viewpoints)	Very High			Low adverse ¹	Moderate-High adverse	1 - Moderate adverse
	Low Moderate adverse (Thomson Gorge Road)	Moderate adverse (Thomson Gorge Road)	Neutral (Thomson Gorge Road)				Low Moderate adverse (Thomson Gorge Road)	Moderate adverse (Thomson Gorge Road)	Neutral (Thomson Gorge Road)						2 -Moderate-High adverse
VS2: Ardgour Road, Lindis Crossing	Moderate adverse (Residential + private viewpoints)	Moderate-High adverse (Residential + private viewpoints)	Low- moderate adverse (Residential + private viewpoints)	Moderate adverse	High adverse	Moderate adverse	Moderate adverse (Residential + private viewpoints)	Moderate-High adverse (Residential + private viewpoints)	Low- moderate adverse (Residential + private viewpoints)	Moderate-High			Low adverse	High adverse	1 - Moderate-High adverse
VS3: Māori Point Road	Low Moderate adverse (Local Roads near Lindis Crossing)	Moderate adverse (Local Roads near Lindis Crossing)	Low adverse (Local Roads near Lindis Crossing)	Moderate High adverse	High adverse	Moderate adverse	Low Moderate adverse (Local Roads near Lindis Crossing)	Moderate adverse (Local Roads near Lindis Crossing)	Low adverse (Local Roads near Lindis Crossing)	Moderate-High to High			Low adverse	High adverse	1 - Moderate-High adverse
															2 – High adverse
VS4: Ardgour Road, Tarras	Low Moderate adverse (Residential + private viewpoints)	Moderate adverse (Residential + private viewpoints)	Low Moderate adverse (Residential + private viewpoints)	Low adverse	Low adverse	Low adverse	Low Moderate adverse (Residential + private viewpoints)	Moderate adverse (Residential + private viewpoints)	Low Moderate adverse (Residential + private viewpoints)	Moderate-High			Low adverse	Low-Moderate adverse	Low adverse
VS5: Jolly Road	Low Moderate adverse (Residential + private viewpoints)	Moderate adverse (Residential + private viewpoints)	Low Moderate adverse (Residential + private viewpoints)	Low Moderate adverse	Moderate adverse	Low Moderate adverse	Low Moderate adverse (Residential + private viewpoints)	Moderate adverse (Residential + private viewpoints)	Low Moderate adverse (Residential + private viewpoints)	Moderate-High			Low-Moderate adverse	Moderate adverse	1 - Low-Moderate adverse
															2 - Moderate adverse
VS6: State Highway 8A	Low Moderate adverse (State Highway 8A)	Moderate adverse (State Highway 8A)	Low adverse (State Highway 8A)	Moderate adverse	Moderate High adverse	Moderate adverse	Low Moderate adverse (State Highway 8A)	Moderate adverse (State Highway 8A)	Low adverse (State Highway 8A)	Moderate-High			Low-Moderate adverse	Moderate-High adverse	1 - Moderate adverse
															2 - Moderate-High adverse
VS7: Pukeowhai Drive, Queensbury	Low adverse (Residential + private viewpoints)	Low adverse (Residential + private viewpoints)	Very Low adverse (Residential + private viewpoints)	Moderate adverse	High adverse	Moderate adverse	Low adverse (Residential + private viewpoints)	Low adverse (Residential + private viewpoints)	Very Low adverse (Residential + private viewpoints)	Low			Low-Moderate adverse	Moderate-High adverse	1 - Moderate adverse
	Low Moderate adverse (local roads)	Moderate adverse (local roads)	Low adverse (local roads)				Low Moderate adverse (local roads)	Moderate adverse (local roads)	Low adverse (local roads)						2 - Moderate-High adverse
VS8: State Highway 6	Low Moderate adverse (State Highway 6)	Moderate adverse (State Highway 6)	Low adverse (State Highway 6)	Moderate High adverse	High to Very High adverse	Moderate High adverse	Low Moderate adverse (State Highway 6)	Moderate adverse (State Highway 6)	Low adverse (State Highway 6)	Moderate-High to High			Low-Moderate adverse	High to Very High adverse	1 - Moderate-High
															2 - High adverse
VS9: State Highway 8, Bendigo	Low adverse (Residential + private viewpoints)	Low Moderate adverse (Residential + private viewpoints)	Low adverse (Residential + private viewpoints)	Low Moderate adverse	Moderate High adverse	Low Moderate adverse	Low adverse (Residential + private viewpoints)	Low Moderate adverse (Residential + private viewpoints)	Low adverse (Residential + private viewpoints)	Low to Moderate-High			Low-Moderate adverse	Moderate-High adverse	1 - Moderate adverse
		Moderate adverse (State Highway 8)	Low adverse (State Highway 8)						Low adverse (State Highway 8)						2 - Moderate-High adverse

Table 2: Visual Effects															
Significant Effects (High/Very High)	BML (Rhys Girvan)			CODC (Stephen Brown)			ORC (Nigel Parker)			EDS (Anne Steven)			Sustainable Tarras (Bridget Gilbert)		
	Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect Rehabilitation planting 1 = successful 2 = unsuccessful		
Visual Effects	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)
	Low Moderate adverse (State Highway 8)						Low Moderate adverse (State Highway 8)	Moderate adverse (State Highway 8)							
VS10: Mount Pisa Road	Low Moderate to Moderate adverse (Residential + private viewpoints)	Moderate adverse (Residential + private viewpoints)	Low adverse (Residential + private viewpoints)	Low adverse	Low Moderate adverse	Low adverse	Low Moderate to Moderate adverse (Residential + private viewpoints)	Moderate adverse (Residential + private viewpoints)	Low adverse (Residential + private viewpoints)	Moderate-High		Low adverse (local roads)	Low adverse	Low-Moderate to Moderate adverse	1 - Low adverse
	Low Moderate adverse (local roads)	Moderate adverse (local roads)	Low adverse (local roads)				Low Moderate adverse (local roads)	Moderate adverse (local roads)	Low adverse (local roads)						2 - Low-Moderate to Moderate adverse

Table 3

It is noted that Table 3 is an amended version of a table attached to RG’s s53 comments, to which all experts now confirm.

The experts clarify that their assessment has been undertaken in relation to s6(a) of the RMA.

All experts acknowledge that their evaluation is confined to Shepherd’s Creek and Rise and Shine Creek, not other hydrological elements on the site.

Table 3: Natural Character Effects																		
Significant Effects (High/Very High)	BML			CODC (Stephen Brown)			ORC (Nigel Parker)			EDS (Anne Steven)			Sustainable Tarras (Bridget Gilbert)			Kā Rūnaka (Alayna Rā)		
	Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect			Level + Nature of Effect		
	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)	Startup (Year 0 - 3)	Mining activity (Year 3-11)	Closure (Year 11-30)
Shepherds Creek	Moderate High adverse	Moderate High adverse	Moderate adverse	Moderate High adverse	Moderate High adverse	Moderate adverse	Moderate High adverse	Moderate High adverse	Moderate adverse		Very High adverse	Low Moderate to Low	Moderate High adverse	Moderate High adverse	Moderate adverse	High adverse		
Rise and Shine Creek	Neutral	Moderate adverse	Low Moderate adverse	Neutral	Moderate adverse	Low Moderate adverse	Neutral	Moderate adverse	Low Moderate adverse		Very High adverse	Low Moderate to Low	Neutral	Moderate adverse	Low Moderate adverse	High adverse		