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BENDIGO-OPHIR GOLD PROJECT
PRELIMINARY ASSESSMENT OF LANDSCAPE EFFECTS PEER REVIEW

Prepared For:

The Central Otago District Council

Brown NZ Ltd
March 2026

1. Introduction

This report has been prepared for the Central Otago District Council (CODC), and it addresses the fast-track application by Matakanui Gold Ltd (MGL) for the Bendigo-Ophir Gold Project at Thomson Gorge Road, Bendigo. It has been prepared in response to the Council's receipt of the final application from MGL, together with the applicant's replies to matters raised in my September and December review reports, and the completion of two site visits to the proposed mine site and various receiving environments around it. Consequently, this review focuses – to a significant degree, but far from exclusively – on the environmental assessments undertaken in support of the application by its consultants and, in particular, the following documents:

- *A.08-A16: The Bendigo-Ophir Gold Project Substantive Application – Part A,* Matakanui Gold Limited (August 2025)
- *B.19: Bendigo-Ophir Mine – Landscape, Natural Character and Visual Effects Assessment Part 1,* Boffa Miskell (11th July 2025)
- *B.19: Bendigo-Ophir Mine – Landscape, Natural Character and Visual Effects Assessment Part 2 - Landscape Closure Plan,* Boffa Miskell (21st July 2025)
- *B.19A: Bendigo-Ophir Mine – Graphic Supplement,* Boffa Miskell (7th May 2025)
- *B.19B: Bendigo-Ophir Mining Project – Landscape Visual Simulations Parts 1-4,* Boffa Miskell (8th July 2025)
- *B.20: Bendigo-Ophir Gold Project Mine Closure Plan,* Boffa Miskell (21st July 2025)
- *B.31: Bendigo-Ophir Gold Project Exterior Lighting Report,* Cosgroves (May 2025)
- *B.39: Matakanui Bendigo-Ophir Gold Project Recreation Assessment,* Rob Greenaway & Associates (June 2025)
- *B.40: Bendigo-Ophir Gold Project Mine Closure Plan,* Mine Closure Management, (August 2025)
- *E.04: Bendigo Conservation Covenant*, Minister of Conservation (June 1989)
- *E.05: Bendigo Conservation Covenant*, Department of Conservation (16th November 2023)
- *F.16: Bendigo-Ophir Gold Project Pre-application Engagement,* Matakanui Gold Ltd (undated)
- *G.07 – G.07BA: Landscape & Ecological Rehabilitation Management Plan Parts A - C,* Matakanui Gold Ltd (October 2025)

In conjunction with the *Substantive Application*, which describes the extent and each phase of the proposed gold mine operations (extending through management of the mine site to closure and

'landscape mitigation'), the following conditions proposed by Matakanui Gold Ltd have also been reviewed:

- D06: *The Concession & Conditions for Ardgour Rise*
- D07: *The Concession & Conditions for SH8 & Ardgour Road*
- D08*: The Concession & Conditions for The Access Route to the CIT Battery*
- D09: *The Concession & Conditions for Willow Management*
- D10: *The Concession & Conditions for Monitoring & Access*

Additionally, on the 9th of March I received two additional sets of conditions ("*Schedule One*" and "*Proposed Land Use Consent and Conditions for Activities Within the Jurisdiction of the Central Otago District Council*"), which expanded the scope of the conditions to also address:

- Mining and related activities (including transportation) on the site;
- The management of lighting within the site; and
- The rehabilitation of the site together with environmental off-setting.

MGL's proposals, which are covered by these conditions, include the relocation of part of the historic Thomson Gorge Road, so as to physically circumvent the mine site. The relocated section of road – shifted northwards, from the Rise and Shine catchment to just north of the Shepherds Creek valley – is referred to as "Ardgour Rise" in the mine assessment and shown in its simulations, although the existing road has not been officially closed, nor the new section of it gazetted. It is assumed that these components of the proposal will occur if consent for the mine is granted.

Finally, public submissions on the fast-track application have been reviewed, and BML's responses to a number of technical matters raised by me through CODC, addressing the draft Landscape Assessment, are also considered in this review.

Accordingly, this report is subdivided into the following sections:

Section 2. **Technical Review:** referencing *Te Tangi a te Manu*, the NZILA's primary guideline document in relation to landscape assessment and methodologies, together with the Institute's *Best Practice Guide 10.2*, which addresses the issue of visual-photo simulations. On the 31st of October, a response was received from the applicant, which addressed several technical concerns raised in my preliminary (August 2025) review of BML's assessment, and that response is also addressed in this section.

Section 3. **Statutory Context:** addressing relevant provisions of the Operative Otago Regional Policy Statement (2019), the Proposed Otago Regional Policy Statement (2021), and the Central Otago District Plan, in particular.

Section 4. **Evaluation of Effects:** involving a detailed review of the effects identified in the BML report (Part 1) and related graphic attachments (Part 1 and Part 2). In addition to a site visit undertaken to the application site on the 6th of August 2025, I have visited the Mata-Au Clutha River valley multiple times over recent years, and this has both informed and contextualised my review. As a result, this section of my review addresses effects relative to:

- Individual viewpoints;
- The various receiving environments and catchments around the Bendigo-Ophir site; and
- Any cumulative effects.

Section 5. **Night-time Effects:** addressing the night-time effects of the proposal and two related reports prepared on behalf of the applicant by Cosgroves.

Section 6. **Site Rehabilitation:** mainly focusing on the proposed rehabilitation of the pits, ELF, WELF and their surrounds, but also addressing the proposed off-setting of effects.

Section 7. **Key Findings:** a summary of key findings taking into account all of the above, together with a review against relevant statutory instruments.

Section 7. **Conclusions:** my conclusions and recommendations.

2. Technical Review

2.1 Introduction

I have reviewed BML's assessment and visual simulations, and I am satisfied that the visual simulations accord with the guidelines for visual simulations found in the NZILA's *Best Practice Guide 10.2* (Visual Simulations). I do, however, have some concerns about the structure of the actual assessment when measured against the NZILA's landscape assessment guidelines provided by *Te Tangi a te Manu*. That assessment has been prepared by Rhys Girvan and Hannah Wilson, and then reviewed by Frank Boffa. As is outlined at the beginning of BML's application report, their involvement in the project includes contributing to the evolution of the mine's design and layout, as a precursor to the actual AEE. As a result, the contents of the report are wide-ranging and progress through the following steps:

1) The approach to assessment
2) The mine's landscape context
3) Its statutory planning context
4) A description of the project and the related landscape strategy
5) Evaluation of landscape and visual effects, including recommended mitigation measures
6) Evaluation of natural character effects
7) Summary and conclusion

I don't go through each of these sections in forensic detail, but instead focus on those matters of particular relevance to the landscape outcomes and effects identified.

2.2 Review of Key Sections

In addressing its approach to assessment, BML makes the point that it has been involved in the preparation of the mine proposal. BML's description of that involvement is, however, quite succinct and simply states that:

> *…… the project drawings prepared for the application have been reviewed by BML landscape architects and further developed through an iterative design process. Through this process, input into the proposed project layout has included the siting, size and appearance of landforms and ancillary structures where possible to assist in integrating these elements within the landscape, and associated planting to rehabilitate disturbed areas and mitigate potential adverse effects. Current aerial imagery and Zone of Theoretical Visibility (ZTV) modelling has also assisted with project shaping.*

On this basis, it appears that BML would have been involved in the preparation of some of the mine management concepts, perhaps even the staging outlined in the *Substantive Application – Part A*. To this

end, the *Mine Closure Plan* contains BMLs simulations, together with their *Landscape Mitigation Plan* and *Landscape Closure Plan* in its Appendix E. Somewhat paradoxically, though, Section 8 of the Plan, addressing *Closure Outcomes and Completion Criteria*, does not mention any landscape outcomes.

Turning to the mine's landscape context, BML's assessment makes the point that the mine catchments' land cover has been highly modified due to past mining activities and ongoing farming. Consequently, a matrix of tussock has been largely replaced by scabweed and a range of introduced grasses. The report also addresses two landscape assessments undertaken of the mine area and its wider setting: the *Central Otago District Rural Review Landscape Assessment* (2007) and the *Bendigo-Ophir Gold Project Assessment of Dunstan Mountains Outstanding Natural Landscape* (2024). Both of these were undertaken by BML, with the second report acting as a precursor to the current application. The first of these reports identified most of the Dunstan Mountains as being an ONL, with section 3.4.1 (p.9) stating that it displays, "*extreme sensitivity to development, including ..... new tracks and roads .....*". It is also notable that the Bendigo and other river terraces below the mine site are identified in the 2007 report as having significant sensitivity, while the faces of the Bendigo Terrace are also identified as a Significant Landscape Feature.

In addressing the ONL's 2024 values, the following factors are notable:

Physical

- *Highly intact mountain sequence, expressive of its tectonic, and glacial formative processes.*
- *Remnant peneplain from the Cretaceous period remains highly legible and forms an extensive summit plateau feature to the south which remains distinct from the more angular mountain forms and summits to the north…….*
- *Within the area and adjoining Bendigo Scenic Reserve is a remnant stand of kanuka valued as one of a few remnants left in Otago associated with former gold mining activity.*

Perceptual

- *Panoramic views of a broader mountain backdrop and unobstructed skyline are highly valued and broadly visible throughout the Upper Mata au/Clutha and Manuherikia catchments.*
- *Important local landmarks and wayfinding features include the Mata-au gorge, Haehaeata and Thomsons Gorge.*
- *The underlying geology and geomorphology of the landform 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…….*
- *Rugged kanuka covered promontory along the immediate skyline (part of which falls outside the ONL within Bendigo Scenic Reserve) adjoins the north-eastern end of Lake Dunstan before transitioning into a broader more defined grassland plateau and mountain backdrop above.*
- *General lack of visible structures and modifications ensures the landform remains largely open and is perceived as natural with some more localised and limited evidence of gold mining amongst a broader coherent and open mountain backdrop.*

Associative

- *Matakinui (Dunstan Mountains) formed part of a traditional travel route between Makarora and Moeraki. The area is recognised as a mahika kai site where weka and tikumu (mountain daisy) were gathered, as well as taramea (wild spaniard) which was gathered for its perfume…….*
- *The Bendigo area is renowned for its gold mining history from the mid-1800s. Remnants of this time period are still present today near the settlement of Bendigo.*
- *Several stations including Bendigo, Northburn, Matakanui, Cloudy Peak and Cluden Stations support a strong farming history in the area that dates back to the 1850's when the large Morven Hills Station was formed. This land use is ingrained in the character and shared associations of the landscape.*
- *The Dunstan Mountains are highly valued for their recreational opportunities, including hunting, tramping, mountain biking, 4WD, and horse trekking. …….*

Summarising the values associated with the current landscape, BML's report states as follows at Section 3.5:

> *The Dunstan Mountains retain a high sense of naturalness albeit entrenched in human influence over several centuries. As a low point through the mountains, Thomsons Saddle formed part of a traditional travel route from Moeraki on the east coast of Te Waipounamu to Makarora to the north of Lake Wanaka. In later years, the mountains became the site of gold exploration within the Bendigo area, of which relics of this time are still present today. Present land use is largely associated with farming of merino sheep with grazing typically more evident on the lower slopes.*

Focusing more directly on the current mine site, that same assessment includes the following (section 3.6, p.9):

> *The character of upper Rise and Shine Creek valley to the south of the Shepherds Creek headwaters are characterised by the grazed slopes of Mount Moka, and areas of grey scrubland on the lower slopes. Within this area, areas of gold mining previously undertaken by sluicing remain apparent from the historic Bendigo Gold Rush and influence the flat form of the valley floor. The area is currently grazed and traversed by Thomson Gorge Road to the true left of the creek bed. …….*
>
> *Beyond the valley, the Site is characterised by the lower terraces on the fringes of the Dunstan Mountains …….. This area has a flatter topography, and therefore more conducive to more intensive farming, and irrigation practices. From this viewpoint, the skyline and backdrop of the Dunstan Mountains becomes more evident, including features such as Battery Hill.*
>
> *To the north of the Shepherds Creek Valley is Ardgour Station which transitions from the more intensely farmed landscape to the north-west, to the exposed upper slope of the Dunstan Mountain Range. …… the character of the adjacent valley transitions into a rugged and exposed landscape containing several schist tors, tussockland, and taramea in the upper reaches.*

Also noteworthy, but not just in relation to the ONL, is the rapid transition into a mixture of historical gold field sites and remnants, cherry orchards and vineyards – both on and below the Bendigo Terrace, in close proximity to the Rise and Shine and Shepherds Creek catchments. This transition is even more marked near the foot of the Bendigo Scenic Reserve, which extends to the edge of the Shepherds Creek catchment near the restored Come in Time Stamper Battery.

Turning to the issue of who would be exposed to the proposed mine, more particularly its open-cast pits and related accessways, Section 3.7 addresses the wide range of receiving environments and audiences that were first identified as being potentially exposed to the proposed mine, via ZTV modelling, initial field work and photos. Those catchments and audiences extend from the alluvial terraces and SH8 on the near side of the Mata-Au Clutha River valley to SH8A at its northern end near Tarras, and Queensbury, together with lifestyle blocks on the Pisa Mountains at its far (western) edge.

This is followed by a description of the proposal's statutory planning context, which includes the Fast-track Approvals Act (2024), sections 6(a) and (b) of the Resource Management Act (1991), the Operative and Proposed Otago Regional Policy Statements (2019 and 2021), and the Central Otago District Plan (2008). More specifically, BML's report references Sections 4 and 13 of the Central Otago District Plan, which provide for protection of its ONLs, maintaining the open character of its hills and ranges, and avoiding, remedying or mitigating adverse effects on both. This range of statutory instruments is further detailed, compehensively, in the report's Appendix 2.

Attention is also drawn to the Bendigo Conservation Covenant, which overlies part of Bendigo Station and (section 4.8, p.18) sets out to:

1) Protect and enhance the natural character of the land;
2) Protect the land as an area representative of a significant part of the ecological character of the Dunstan Ecological District;
3) Maintain the landscape values of the land as referred to in the "*Application for exchange of property rights*" submitted to the Commissioner of Crown Lands; and
4) Maintain the historical values of the land referred to in "The rich fields of Bendigo" by Jill Hamel, February 1993.

Section 5 of BML's report highlights the very wide-ranging nature of the Bendigo-Ophir Mine proposal, which would result in 568ha of land disturbance and includes:

- The Rise and Shine, Come in Time, and SRX open mine pits;
- A longer-term underground Rise and Shine Mine near Shepherds Creek;
- The Shepherds Creek and Western Engineered Landforms (ELFs);
- The realignment of Shepherds Creek;
- The creation of a haul road and hard rock processing plant next to it;
- The development of water storage dams;
- The operation of a Tailings Storage Facility (TSF) in the upper reaches of Shepherds Valley; and
- The provisions of offices, storage facilities, an explosives compound and other utilities on the Ardgour Terrace.

Key time frames for the mine are specified as follows:

- *Startup: Year 0-3. Project startup and development. Construction of initial infrastructure and preparation works.*
- *Mining activity: Year 3-11. Main extraction period. All components of the proposal will be operational during this stage of the project.*
- *Closure: Year 11-30. Project closure and rehabilitation following completion of extraction.*

Section 6 of BML's report traverses the proposed mine's landscape and visual effects and begins by identifying the existing characteristics and values of the Dunstan Mountains ONL, including associative values and connections, followed by an analysis of the nature and extent of landscape modification anticipated as a result of the proposed mining activities and structures. The description of the proposed works is detailed, including in relation to the proposed open pits, bench rehabilitation and the creation of the proposed ELFs . It concludes by addressing the 'Ardgour Rise'.

The assessment then addresses the effects of the proposed mine on the ONL values of just the site – not the wider Dunstan Mountains, or the Mata-Au Clutha River valley and related areas. It determines that the proposal's landscape effects would be **moderate** initially, then **low-moderate** upon closure, with the mine's mitigation measures starting to take hold.

However, I admit to being somewhat confused by sections 6.5.3 – 6.5.5, as the term 'Landscape Effects' appears to solely refer to effects within the area of the mine site, and not its wider landscape setting, including the Dunstan Mountains ONL. Unsurprisingly, therefore, much of the commentary in these sections (and related sub-sections 6.5.3.1 – 6.5.3.14) relates to biophysical changes within the prescribed site, although not exclusively so. Thus, at section 6.5.4 (2nd para.), BML's commentary briefly expands to include the following comments:

> ……. *The proposed mine and its ancillary components including the plant, haul roads, and diversion channels, will interrupt the overall coherence of the landform on the western slopes of the Dunstan Mountains, however the overarching natural and open character and skyline above will largely remain. During startup and mining activity phases of the mine, earthworks, transient presence of vehicles, and structures will contrast with the broader high country rural landscape, with modification to the underlying landform, and vegetation patterns which are reflected and valued in other areas of the ONL.*

Yet, this evaluation appears to be either out of place or somewhat premature, as the next section of the report – 6.6, addressing 'Visual Effects' – turns to the effects of the proposed mine in relation to a much wider array of receiving environments spread around it. It employs 10 representative viewpoints to do so. At the same time, BML's report states that 'visual effects' (para. 6.6, p.39, 1st para.) are:

> "*…a component of overall amenity* [which] *therefore contribute to peoples' appreciation of the pleasantness and aesthetic coherence of a place.*"

This infers that when moving to the topic of visual effects one is transitioning away from landscape effects that may well include section 6(b) matters (outstanding natural features and landscapes), into section 7(c) matters that are of less importance. At the very least, BML's description (above) appears to be closely aligned with the RMA's definition of "*amenity values*. Consequently, the structure of BML's report and its

description of 'visual effects' appears to create an artificial division between landscape effects, which are largely confined to the proposed mine site, and visual effects – of lesser significance – which address all areas and receiving environments that are external to it.

In my opinion, this approach is incorrect. The Dunstan ONL clearly has values that are appreciated within catchments stretching well beyond the bounds of the proposed mine, or even the Dunstan Range's ONL overlay boundaries (my **Attachments 1-3**). In this regard, *Te Tangi a te Manu,* which is the NZILA's guiding document on landscape assessment, para. 4.22 states that:

> "*In keeping with the Act such definition enables the development of landscape assessment which takes into account:*
>
> - *Natural and physical environment; and*
> - *Perceptual; and*
> - *Associative aspects (beliefs, uses, values and relationships) which may change over time"*.

In other words, the construct of landscape comprises all of the above, as is confirmed in Appendix 1, BML's Method Statement. While effects on the natural and physical environment well may be more solidly anchored by the site (in this case, the Bendigo-Ophir Mine site), the perceptual and associative aspects and effects of any proposal don't suffer from any such constraints. Furthermore, at para.s 6.08 and 6.09 (pages 135 and 136) *Te Tangi a te Manu* makes it clear that visual effects contribute to, and are part of, 'landscape effects' – not separate from them:

> *6.08 A visual effect is a kind of landscape effect. It is a consequence of landscape values as experienced in views. Visual effects are a subset of landscape effects. A visual assessment is one method to help understand landscape effects.*
>
> *6.09 These Guidelines take a different approach from that taken in some other guidelines which treat landscape and visual effects separately. …….. These Guidelines promote an integrated approach for the following reasons:*
>
> - *Landscape values arise from the combination of physical, associative, and perceptual dimensions. …… effects on landscape values should consider not only the physical environment but also its associated meanings and how it is perceived through all the senses.*
> - *Visual values are inherently linked to landscape values. The nature of a view depends on how it is perceived and the extent to which it is valued or not. It includes how the landscape in the view is understood, interpreted, and what is associated with it. Visual effects arise from changes to such landscape values. For example, visual effects may arise from changes to a view's aesthetic qualities, or the expression in the view of the landscape's biophysical wellbeing, or whether a meaning associated with a landscape is strengthened or diminished in the view. A pitfall is to superficially treat visual effects as mere visibility or changes to a view rather than the implications for the landscape values experienced in the view.*

Although BML's Method Statement appears to be aligned with these paragraphs, I do not consider that it is reflected in the way in which landscape and visual effects are addressed in their actual assessment.

Having explored my concerns about this matter in some detail, BML's section 6.6.1 usefully introduces a sample of 10 viewpoints for which visual simulations have been prepared and evaluations undertaken, on behalf of the various receiving environments around the application site. Each viewpoint is described as

being publicly accessible, although, in some instances, they capture views that are similar to those experienced from private residential properties.

This evaluation is followed by an analysis of the mine's effects on views from residential and private viewpoints, then views from roads and highways, and finally from conservation reserves and recreation areas. Appendix 4 contains further evaluations and effect ratings for another 56 'residential' viewpoints within 5km of the mine site. These are then followed by the aggregated effect ratings for 21 'viewing areas' (not individual viewpoints) more than 5km from it, both sides of the Mata-Au Clutha River. These set out to address the mine's effects on private residential properties, although section 6.6.1.1 states that no private properties were actually visited in the course of this appraisal, which could raise concerns about the accuracy of these findings in some instances.

In my opinion, these assessments of both public and private viewpoints are useful, not just in addressing the visual effects of the Bendigo-Ophir Mine Project, but also its landscape effects, as is contemplated in *Te Tangi a te Manu*.

BML's Section 7 then turns to the issue of natural character effects, most of which pertain to the significant changes anticipated for Shepherds Creek, including its Jean Creek tributary, and Rise and Shine Creek. This section addresses the values associated with both streams and their margins, before exploring the effects that the proposed mine would have on them. These would be derived from the relocation of the stream course and its margins, together with creation of the proposed ELF and TSF near it. The Rise and Shine Creek, to the west, would also be subject to modifications, although these would be less fundamental to the alignment and character of the current steam corridor. The effects arising from these changes are summarised in Section 7.3.1, addressing such matters as each stream's geomorphology, hydrology, flow rates, and their marginal vegetation cover.

BML's assessment concludes with its Summary and Conclusion in section 8, which focuses on the effects ratings attributed to key aspects of the proposed mine, and its stages. In line with the commentary above the conclusions focus largely on the mine's in-site landscape effects, its wider 'visual' effects, and a range of natural character effects.

Finally, I need to acknowledge the comprehensive sequence of Graphic Attachments found in Appendix 5, which includes:

- Maps and aerial imagery, which analyse the site and its geophysical context;
- Photos of the site and its more immediate surroundings;
- Contextual photos from key vantage points around the site towards it; and
- Visual simulations prepared for the aforementioned viewpoints.

These conclude with the Landscape Mitigation Plan and the Mine Closure Plan, which are sufficiently detailed to provide a clear understanding of both processes. In particular, the latter plan helps to

graphically explain the detailed proposals for the closure and rehabilitation of the Bendigo-Ophir Mine that are found in the Mine Closure Plan prepared by Mine Closure Management Pty Ltd.

2.3 Summary

For the most part, I consider BML's assessment to be appropriately structured, detailed and comprehensive. However, as discussed above, I retain concerns about the manner in which 'landscape effects' and 'visual effects' are addressed and apparently differentiated from one another. Indeed, one could well regard the viewpoint assessment undertaken by BML as implicitly addressing the 'perceptual' component or dimension of landscape effects. In relation to more 'associative' effects, the viewpoints and related views only tell part of the story. Clearly, they help to paint a picture of the Dunstan Range that is fundamental to their visual signature and identity. They also help to affirm the local branding of Bendigo's wine *terroir*, while DOC's historic reserves help to explore the area's goldfields history. This includes the Come in Time Stamper Battery that has been restored within Thomson Gorge (near the proposed mine site), the remnants of Welshtown and Logantown within the Bendigo Quartz Reefs Historic Area, and even the historic trail of Thomson Gorge Road. In addition, there are numerous comments online about the heritage and scenic values of the DOC reserves abutting the application site, including many on TripAdvisor[1]. Such matters are briefly addressed in section 3.4 of BML's assessment, but this is already confined to the following comment in section 6.5.3.1.4 (3rd para.) addressing the realignment of Thomson Gorge Road – as follows:

> ……. *In associative terms, realignment of this section of Thomson Gorge Road will modify the established experience traversing a lowered pass that cuts through the Dunstan Mountains. Associations with this physical connection between the upper Mata au and Manuherekia is also identified by tangata whenua. During mining activity landscape effects of relocating this connection through the Rise and Shine valley will modify associations with historic link through the Site and broader Dunstan Mountains landscape. Access to the Come in Time Battery, and Thomsons Saddle will be maintained, and the road will be reopened as a recreation track post mining activity.*

Otherwise, though, I have struggled to find any commentary or analysis of the effects that the mine would have on the sense of place, identity and other associative values linked with the Bendigo-Ophir area and various upper Mata-Au Clutha catchments – either for locals and/or visitors to the area. Even section 6.6.1.3, which focuses on the impact that the proposed mine would have on conservation and recreation areas, is limited to comments about the relative visibility of the mine's ELF, ore stockpile and other components from the Kanuka Loop Track. There is no obvious assessment of effects on the actual values associated with DOC's historic reserves. All of which is perhaps surprising, given that the history of the area seems closely aligned with at least some forms of gold mining in the very immediate vicinity of the current proposal. As a result, it appears that there is little, if any, assessment of effects on associative landscape values.

In a related vein, the absence of any assessment from private residences, or their grounds – if only to explore the proposed gold mine's effects on local communities (rather than private individuals) – is also

1. https://www.tripadvisor.co.nz/Attraction_Review-g7909172-d7901138-Reviews-Bendigo_Historic_Reserve-Bendigo_Central_Otago_Otago_Region_South_Island.html

of some concern. This reinforces impressions that the mine's associative effects have not been fully explored, notwithstanding the plethora of viewpoints and viewing areas employed in BML's assessment.

Overall, therefore, I consider that BML's assessment is very wide-ranging and detailed. Nevertheless, I am concerned about some aspects of it, as described above.

2.4 BML's Response To RFIs From CODC

On the 31st of October 2025, MGL provided a table that contained the responses to various matters raised by CODC in its pre-application review of MGL's draft environmental assessments. These included matters identified in my pre-application review of BML's draft landscape assessment – as set out below:

CODC	MGL/Consultant Response
a) The manner in which 'landscape effects' and 'visual effects' are addressed and apparently differentiated from one another.	The Bendigo Ophir Mine: Landscape, Natural Character and Visual Effects Assessment (the "Assessment", dated 23 July 2025) follows Te Tangi a te Manu (2022) and addresses the matters required under the Fast-track Approvals Act (2024), which treats landscape and visual effects as related but distinct lines of inquiry. ▪ Landscape effects are addressed in Part A, Section 6.5, focusing on the implications of changes to the physical, perceptual and associative characteristics and values of the Dunstan Mountains ONL, including landform modification, vegetation disturbance, and rehabilitation outcomes over time. ▪ Visual effects are addressed in Section 6.6 and Appendix 4, where effects are analysed with reference to the viewing audience and viewpoints introduced in Section 3.7: Visual Appraisal, applying NZILA Visual Simulation BPG 10.2 methodology. This engages with how changes to the landscape are perceived from particular locations and by different audiences. In summary, the report distinguishes between broader effects on the landscape itself (its fabric, character and values) and effects on how that landscape is seen by people from various locations.
(b) The absence of commentary or analysis of the effects that the mine would have on the sense of place, identity and other associative values linked with the Bendigo-Ophir area and various upper Mata-Au Clutha catchments – either for locals and/or visitors to the area.	The Assessment identifies the key associative values addressed within the landscape character analysis in Section 3.4. This draws on an earlier Dunstan Mountains ONL assessment (Boffa Miskell, 14 May 2024), prepared in accordance with *Te Tangi a te Manu*, as well as relevant recreation, heritage, and cultural values material made available. In short, this analysis considers the landscape cues and patterns that contribute to the sense of place and identity experienced by both local communities and visitors, recognising that these associations arise from the legibility and coherence of the broader Dunstan Mountains landscape rather than discrete viewpoints alone. Based on this comprehensive analysis, relevant associative landscape aspects include explicit references to traditional travel routes, mahika kai, historic gold mining, recreational use, and the

	legibility of underlying geomorphology and natural processes. Accordingly, the landscape effects assessment addresses associative values as an integral part of the landscape analysis, including the degree to which the coherence, legibility and key characteristics of the Dunstan Mountains ONL will be retained during and after mining. The assessment concludes that while localised, and in some areas, high adverse effects will occur, the broader landscape patterns, skyline, and key topographic relationships that underpin recognised associative values at the broader landscape scale will largely remain. Rehabilitation measures are described to progressively reinstate natural patterns, maintain access through the Dunstan Mountains, and re-embed the mine within the wider landscape mosaic over time. This ensures that the enduring landscape cues which underpin sense of place and identity remain present and will continue to evolve. Specifically, this includes a coherent interface between the northern and southern Dunstan Mountains. In this way, associative values are addressed alongside the underlying physical and perceptual framework, rather than as a standalone thematic section.
(c) The absence of assessment of effects on the actual values associated with DOC's historic reserves.	The Assessment describes the location and values of Bendigo Scenic Reserve and Bendigo Conservation Area (Sections 3.3–3.7), noting their proximity, the intervening topography, and the nature of available views. No direct physical effects on adjoining reserves will occur during mining. Landscape effects are limited to temporary changes to access arrangements and the range of available views, both of which have been explicitly considered. Access to the Come in Time Battery will be maintained throughout the mining period. Thomsons Gorge Road, which provides access to adjoining DOC reserves, will be reopened as a recreational track following mining activity. Section 6.6.1.3 explicitly addresses potential visual effects from the Bendigo Historic Reserve, noting that views are largely confined to areas near the Matilda Battery Track and associated four-wheel drive route. While ELF and ore stockpile elements will be visible during later stages, the assessment concludes these will not materially disrupt the wider views or the levels of perceived naturalness that contribute to the Reserve's values. Visual effects are assessed as no greater than very low adverse, reducing to neutral upon closure. Accordingly, effects on the actual landscape and recreational values associated with DOC's historic reserves have been identified and assessed within the Landscape and Visual Effects Assessment.
d) The absence of any assessment from private residences, or their grounds, if only to explore the proposed gold mine's effects on local communities (rather than private individuals)	Section 6.6 provides a comprehensive assessment addressing available views within the surrounding landscape including section 6.6.1.1 which specifically considers views from residential and private viewpoints. While no private properties were visited or simulated, representative viewpoints were chosen to illustrate the range of effects likely to be experienced by nearby communities. Based on this detailed assessment, the locations of potential private views have been modelled and then mapped in Figures 10 and 11 of the Graphic Supplement alongside the potential level and nature of effects set out in Appendix 4. This approach allows the assessment to

	address community-scale amenity outcomes while maintaining a methodologically consistent and publicly accessible basis for evaluation. The Assessment notes that visual effects from private viewpoints "range from very low adverse to moderate–high adverse," with the greatest effects expected from Bend Terrace
e) The absence of an overall assessment of effects on associative landscape values.	As addressed in (b) above, associative values are identified within Section 3.4 of the assessment, consistent with *Te Tangi a te Manu*, which recognises that landscape character is shaped by overlapping physical, perceptual, and associative dimensions and change through time. Accordingly, associative values—including cultural routes, gold mining heritage, recreational use, and their contribution to shared and recognised landscape values—are considered within the overall landscape effects assessment (Section 6.5), rather than being isolated in a separate section.

I don't propose to debate these matters, other than to make it clear that meaningful visual changes within any landscape inevitably translate into altered perceptions of its character and values. Such effects fall under the umbrella of perceptual or experiential effects, one of the three key landscape dimensions described above. 'Visual effects' are not an end-point on their own, and Paragraph 6.09 of *Te Tangi a te Manu* reinforces this point in stating as follows:

- *A pitfall is to superficially treat visual effects as mere visibility or changes to a view rather than the implications for the landscape values experienced in the view.*

Yet, BML's assessment appears to fall largely into this 'trap', when stating (at the start of BML's section 6.6): "*In short, this aspect of the assessment considers the effects of visual change that the proposed mine would bring to the outlook and views of people who make up the identified viewing audience*". In other words, BML's Section 6.6 addresses 'visual effects' in precisely the manner that *Te Tangi at te Manu* says not to. BML's introductory paragraph to Section 6.6 further states that "*Visual effects are a component of overall amenity and therefore contribute to peoples' appreciation of the pleasantness and aesthetic coherence of a place alongside its cultural and recreational attributes*". As stated above, this effectively relegates such effects to an 'amenity consideration'. Yet, in reality, they are a key component of human perception of any landscape. As such, 'visual effects' are critical to appreciation of effects on landscape attributes, character and values, which remain fundamental to any landscape assessment.

In relation to the key matter of effects on the Dunstan Mountains ONL, a further response was received from the applicant on the 13th of February 2026. This addressed BML's evaluation of effects on the ONL for more remote locations, including SH8, SH6 and the Queensberry area; and contained supplementary assessments for those locations:

> ***SH8 (Site Context Photograph 4 & Visual Simulation 9):*** *From this location, views are available around 10 km from Battery Hill. Effects are described as beginning to erode part of the coherent mountain backdrop and skyline intactness during mining, but these are generally transient and oblique and define a legible transition between the north and south Dunstan Mountains. Elements of the proposal which will be visible from this viewpoint are primarily associated with the proposed Engineered Landform (ELF) within the Shepherds Creek*

valley, the Pest Exclusion Areas, Rise and Shine (RAS) topsoil stockpile, and Ardgour Rise, all of which remain below the highpoint of Battery Hill maintained along the skyline. Glimpses of the upper reaches of the Come in Time pit and ELF Plant are also available with overall effects no greater than ***moderate adverse*** *during mining, reducing to* ***low adverse*** *at closure with rehabilitation. During operation, potential for lighting effects associated with plant infrastructure on the toe of the ELF has also identified from this area as addressed in further detail in response to the lighting assessment below.*

SH6 (Site Context Photograph 12 & Visual Simulation 8): *Views are typically long-distance and transient (beyond 13km from Battery Hill), extending from the Queensberry area southwest along the toe of the Pisa Range. Key aspects of the proposal that will be visible from this viewpoint will include the ELF, ELF Plant, WELF, part of the eastern face of the Rise and Shine (RAS) pit, Battery Hill topsoil stockpile, Come in Time (CIT) pit, ore stockpile, and Pest Exclusion Areas. Within the context of the Dunstan Mountains ONL, the mine will also remain below Battery Hill visible along the skyline and within the context of lower Shepherds Creek which works to conceal most of the operational mine components and plant during operations. At closure, rehabilitation is anticipated to recess several elements, and the Battery Hill topsoil stockpile and associated skyline effect) would be removed, although exposed benches at Rise and Shine Pit would remain in the context of a broader coherent natural backdrop. Consequent visual effects will be* ***moderate adverse*** *and reduce to* ***low adverse*** *at closure with rehabilitation.*

Queensberry area (Site Context Photograph 10 & Visual Simulation 7): *Elevated lifestyle areas some 17km from Battery Hill enable panoramic views to the broader Dunstan Mountains backdrop. In this context, views of Battery Hill occur below the skyline and the ridge north of Shepherds Creek which can be identified, while the upper Shepherds Creek catchment remains concealed from the valley floor in this broader view above which aspects of proposed mining elements will be visible over very long distances. During mining activity, the proposal will also be viewed in the context of the broader Dunstan Mountains. In terms of adverse effects, it is acknowledged that the proposed mine will disrupt part of the coherent backdrop of the Dunstan Mountains, levels of perceived naturalness, and the connection between the peneplain to the south, and defined ridge to the north however any consequent visual effects are assessed as* ***low adverse****.*

The additional material then concludes as follows:

While overall effects of some mine elements within the Site are assessed as high and significant during mine operation, namely the RAS, CIT and ELF, broader effects on the ONL are assessed as moderate adverse during start-up and mining, reducing to ***low–moderate*** *adverse on closure as rehabilitation establishes. At the broader landscape scale, the potential for adverse landscape effects have been considered in the context of the characteristics and values of the ONL which will endure and, in some respects, improve through proposed changes in land management practices as part of rehabilitation and Mine Regeneration Zones which occur in response to the proposed mine.*

My initial review had also identified the issue of night-time effects as being only 'lightly' addressed in both BML's assessment and the Lighting Report originally provided by Cosgroves, lighting consultants. Their subsequent report of September 2025 (included in the final tranche of application documents) does outline the lighting proposed for the mine, its compliance with district plan requirements, and its effects on the Bendigo area's 'dark sky' values. In relation to the latter, the following commentary is provided at pages 10-12 of the latest report:

As noted above, the Dark Sky Reserve Lighting requirements are not mandatory for the project area. However, they provide a useful reference for consideration to mitigate the environmental impacts/effects of exterior lighting.

It is proposed that the project shall work to achieve these requirements, during detailed design, modelling, and subsequent installation on site, as far as is reasonably practicable for the safe and efficient operation of project activities. The overview below indicates where MGL expects to be able to achieve the listed 'Standards' for Dark Sky Reserve Lighting.

LIGHT-S1

"All fixed exterior lighting shall be directed away from any adjacent roads, residential properties and lakes."

- *The detailed design is proposed to include full lighting modelling and calculations to demonstrate and ensure that the final design and implementation of lighting for the project achieves this requirement.*
- *It shall be communicated to the teams responsible for on-site installation and setting up of lighting (including mobile lighting plant) that this requirement is to be met.*

LIGHT-S2

"All outdoor lighting shall be shielded from above the light in such a manner that the edge of the shield is below the light source."

- *It is intended that the final specification and selection of light fittings will incorporate this requirement, as far as is reasonably practical.*

LIGHT-S3

"Within the Dark Sky Precinct, all outdoor lighting shall have a colour temperature of light emitted of

3000K Kelvin or lower."

- *It is generally proposed that lighting specifications shall include a light source with a colour temperature of 3000K.*
- *However, this may not be appropriate for undertaking specific tasks such as plant maintenance or drilling, where high visibility is necessary for practicality and health and safety reasons. The detailed design will identify locations where more intensive lighting is required for safe operation.*

LIGHT-S4

"Only light-emitting diode, low pressure sodium and high-pressure sodium lamps shall be used."

- *Only fittings using LED light sources would be proposed.*

LIGHT-S5

"Within the Dark Sky Precinct, all outdoor lighting with a light output of 500 lamp lumens or greater shall be shielded or tilted so as to not emit any light at or above a horizontal plane measured at

the light source."

- *This is essentially covered by specification in compliance with standard S2, and so will be achieved as far as is reasonably practical.*

LIGHT-S6

"Lighting shall be limited to a maximum of 12 lumens per m^2"

- *This requirement would be very limiting to any operational areas of the project and so it is not considered practical to achieve in all areas.*

A number of mitigation measures are proposed in order to achieve this requirement where practicable:

- *Lighting levels will only exceed this value when and where required for operational practicality / health and safety.*
- *Lighting exceeding this level will generally be within mining and process areas, well away from any neighbouring boundaries or public roads.*
- *Light fittings used will still comply with LIGHT S1-S5 (as far as is reasonably practical), i.e. will generally be directed and shielded so as to mitigate/minimise light spill, distant observer glare and upward light into the sky.*

BML's response to CODC's RFIs addresses the various mitigating factors outlined by Cogroves, but also makes the point (p.3) that:

> *Accordingly, the potential for visual effects of lighting associated with the proposed mine are primarily associated with views of activity within the RAS and CIT pits, ELFs, stockpiles and haul roads with more limited views of proposed Plant Buildings, which primarily remain contained within the lower Shepherds Valley. Potential views of lighting in these areas will be varied and most apparent from elevated areas west of the Upper Clutha valley and from mid-long distance locations such as SH6, SH8 and the Queensbury area, as described above.*

It is also stated that bunding will be placed around the mine tracks to minimise headlight wash, although it is difficult to see how this would be effective, given the elevated nature of the mine site when viewed from many quarters, while Cosgroves' suggested 'conditions' would remain essentially voluntary – subject to 'operational practicality', which would provide a wide-ranging waiver from the proposed controls.

3. Statutory Context

In terms of the Fast-track Act, Schedule 5, section 7 identifies the "*Matters To Be Covered In Assessment of Environmental Effects*". These include:

> *(a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:*
>
> *(b) any physical effect on the locality, including landscape and visual effects:*
>
> *(d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:*

Section 17 of the Act then goes on to state that the Panel assessing any Fast-track application must take into account matters that include the Act's purpose – "*to facilitate the delivery of infrastructure and development projects with significant regional or national benefits"* – and "*the provisions of Parts 2, 3, 6, and 8 to 10 of the Resource Management Act 1991 that direct decision making on an application for a resource consent (but excluding section 104D of that Act)."*

Reflecting these directions, Section 4 of BML's assessment addresses the statutory context for the Bendigo-Ophir application, beginning with:

- Section 6(a) of the Resource Management Act, which addresses the preservation of the natural character of wetlands, lakes, rivers and their margins.
- Section 6(b) of the RMA, which addresses the protection of outstanding natural features and landscapes.
- Sections 7(c) and (f) of the RMA, which address the maintenance and enhancement of both amenity values and the quality of the environment.

A brief overview is then provided of the National Policy Statement for Freshwater Management (2020), the Operative Otago Regional Policy Statement (2019), the Proposed Otago Regional Policy Statement (2021), the Regional Plan: Water for Otago, the Central Otago District Plan and the Bendigo Conservation Covenant. Appendix 2 of BML's report then addresses relevant provisions of both the regional and district planning documents in more detail. Among others, these include:

The Otago Regional Policy Statement (2019):

> ***Objective 3.1 – The values (including intrinsic values) of ecosystems and natural resources are recognised and maintained, or enhanced where degraded.***
>
> *Policy 3.1.11 Natural features, landscapes, and seascapes*
>
> *Recognise the values of natural features, landscapes and seascapes are derived from the biophysical, sensory and associative attributes in Schedule 3.*

Objective 3.2 – Otago's significant and highly-valued natural resources are identified and protected, or enhanced where degraded.

Policy 3.2.4 Managing outstanding natural features, landscapes and seascapes

Protect, enhance or restore outstanding natural features, landscapes and seascapes ……..

Policy 3.2.6 Managing highly valued natural features, landscapes and seascapes

Maintain or enhance highly valued natural features, landscapes and seascapes by all of the following:

(a) Avoiding significant adverse effects on those values that contribute to the high value of the natural feature, landscape or seascape;

(b) Avoiding, remedying or mitigating other adverse effects;

Objective 5.4 – Adverse effects of using and enjoying Otago's natural and physical resources are minimised

Policy 5.4.8 Adverse effects from mineral and petroleum exploration, extraction and processing

Manage adverse effects from the exploration, extraction and processing of minerals and petroleum, by:

a) Giving preference to avoiding their location in all of the following:

vi. Outstanding natural features and landscapes beyond the coastal environment;

viii. Places or areas containing historic heritage of regional or national significance;

The Proposed Otago Regional Policy Statement (2019):

Objective LF–FW–O10 – Natural character

The natural character of wetlands, lakes and rivers and their margins is preserved and protected from inappropriate subdivision, use and development.

Objective NFL–O1 – Outstanding natural features and landscapes

The areas and values of Otago's outstanding natural features and landscapes are identified, and the use and development of Otago's natural and physical resources results in the protection of them from inappropriate subdivision, use and development.

Policy NFL–P2 – Protection of outstanding natural features and landscapes

Protect outstanding natural features and landscapes from inappropriate subdivision, use and development by:

1) *avoiding exceeding the landscape capacity of the natural feature or landscape,*

2) *maintaining the values that contribute to the natural feature or landscape being considered outstanding, even if those values are not themselves outstanding,*

3) *avoiding, remedying or mitigating other adverse effects, and ……*

The Central Otago District Plan:

4.3.2 Objective – Outstanding Natural Landscapes and Outstanding Natural Features, and Land in the Upper Manorburn / Lake Onslow Landscape Management Area

To protect the District's outstanding natural landscapes and outstanding natural features, …… (including landforms) from the adverse effects of inappropriate subdivision, use and development.

4.3.3 Objective - Landscape and Amenity Values

To maintain and where practicable enhance rural amenity values created by the open space, landscape, natural character and built environment values of the District's rural environment, and to maintain the open natural character of the hills and ranges.

4.4.2 Policy – Landscape and Amenity Values

To manage the effects of land use activities and subdivision to ensure that adverse effects on the open space, landscape, natural character and amenity values of the rural environment are avoided, remedied or mitigated through:

a) The design and location of structures and works, particularly in respect of the open natural character of hills and ranges, skylines, prominent places and natural features,

b) Development which is compatible with the surrounding environment including the amenity values of adjoining properties, …….

g) Encouraging the location and design of buildings to maintain the open natural character of hills and ranges without compromising the landscape and amenity values of prominent hillsides and terraces.

4.4.10 Policy – Rural Subdivision and Development

To ensure that the subdivision and use of land in the Rural Resource Area avoids, remedies or mitigates adverse effects on:

a) *The open space, landscape and natural character amenity values of the rural environment in particular the hills and ranges,*

b) *The natural character and values of the District's wetlands, lakes, rivers and their margins,*

c) *The production and amenity values of neighbouring properties,*

Section 13 – Infrastructure, Energy and Utilities

13.3.5 Objective – Landscape and Amenity Values

To maintain and where practicable enhance rural amenity values created by the open space, landscape, natural character and built environment values of the District's rural environment.

4. Evaluation of Effects

In this section, I address the substance of BML's assessment, rather than its structure and technical proficiency. I do so by focusing on those sections of the assessment that make a significant contribution to its findings and effects ratings – effectively those addressing Landscape Effects and Visual Effects. However, my assessment is not constrained by the artificial division that I feel BML has created between these types of effect. I have undertaken my own review of the photos and simulations provided by Boffa Miskell, together with Google Maps imagery, and – of key importance – my own field work, to re-evaluate the landscape effects of the proposal. This includes effects on the ONL values of the Dunstan Range and the Bendigo Scenic and Historic Reserves.

4.1 Existing Attributes and Values

A key part of any assessment is the identification of key landscape characteristics and values that might be affected by any proposed development – in this case, the Bendigo-Ophir Gold Mine proposal. At sections 6.5.1.1 and 6.5.1.2 of BML's report, a range of characteristics and values are identified, firstly in relation to the ONL, then the application site. The following excerpts from both sections highlight those that appear to be key at both scales:

The Dunstan Mountains ONL:

- The Dunstan Mountains "*as a highly intact mountain sequence*";
- The way in which they frame the "*eastern extent of the Upper Clutha basin*" and "*form a distinctive mountain backdrop and unobstructed skyline to the east of the Upper Clutha basin*";
- The way in which the "*broader landform is highly expressive of its tectonic, and glacial formative processes, including a remnant peneplain which forms a highly legible summit plateau to the south of the mountain range*";
- In addition, to the north, "*this transitions into an intact angular mountain range, separated by the legible faultline following the general alignment of Rise and Shine Creek*";
- "*Key geological characteristics of this landform include the distinctive schist tors, ….. the gradual movement of soil at higher elevations (solifluction), and intricate network of streams and creeks* [that] *form legible ….. express their formative processes*".
- "*Vegetation within the Dunstan Mountains is varied, from high country farming to matagouri and grey shrubland …..*", and a "*large stand of rugged kanuka forms a distinctive feature to the south-west of the Dunstan Mountain Range ONL ……before transitioning into the broad, open grassland plateau and mountain backdrop above*".
- "*The broader mountains have a high level of perceived naturalness, ……. although localised and limited evidence of gold mining is present*".
- "*Key features include the Mata-au/Clutha Gorge to the south, Haehaeata, Thomsons Gorge, and Cloudy Peak*".

- "*A key transient characteristic is the ongoing change in colours, climatic influences, and shadows which are characteristic of this landscape…….*"including winter snowfall, fog, the "*mottled browns and greys forming the colouration of the Dunstan Mountains ONL* [that] *changes throughout the day with .. shifting shadows" and "a lack of linear modifications, and presence of built form*".
- The Dunstan Mountains are known to mana whenua as "*Matakanui and express a series of interwoven histories for both mana whenua and pākeha*", which relate to it as a mahinga kai site, as well as to the traditional travel route through the Rise and Shine valley, the Bendigo gold mining of the mid-1800s, and today's high-country stations, including Bendigo and Ardgour Stations; and
- The areas "*of conservation land* [that provide] *access to the Bendigo Historic Reserve*".

<u>The Proposed Mine Site:</u>

- "*The Site is central to the Dunstan Mountains outstanding natural landscape …. on the western slopes of the mountain range*";
- "*The Site is located at a highly legible transition point between the peneplain to the south of the Site, and the distinctive ridges and gullies found to the north*".
- It "*forms the transition between the broad, flat character of the peneplain to the south and the defined ridgeline and ragged mountain tops of the northern Dunstan Mountains*";
- "*The Shepherds Creek valley, including Jean Creek, remains highly expressive of its formative processes, although the landcover has been modified to accommodate grazing practices …….*", with the "*underlying geology of the upper slopes of the Rise and Shine Creek valley and Mount Moka remain*[ing] *largely intact and expressive of their formative processes*";
- Evidence of historic "*evidence of sluicing during the first Bendigo gold rush remains evident along parts of the valley floor*";
- "*There is less apparent historic modification extending within the upper reaches of Shepherds Creek valley and a greater associated presence of native vegetation …….*";.
- "*To the south-west of the Shepherds Creek catchment the vegetation becomes more modified transitioning to depleted herbfield and grassland …….*";
- "*A key feature of the Site is the central component of Battery Hill (B10D) which separates the Rise and Shine Creek and Shepherds Creek valleys. This forms a highly legible local landscape feature, occasionally breaching the skyline from certain viewpoints within the Upper Clutha Basin*";
- "*Hydrological features also influence the character of the local landscape which encompass the Shepherds Creek ……. and the Rise and Shine Creek*";
- *"The Site shares similar characteristics to the broader Dunstan Mountains ONL with a general lack of structures and linear elements";*
- "*The Site is subjected to the same transient climatic conditions of snow and fog albeit generally below the elevated summit and snowline, and the changing colouration and shadows of the mottled browns and greys characteristic of the Dunstan Mountains ONL*";
- "*Although modified for grazing and historically mined, the Site retains a high sense of perceived naturalness*";

- It "*forms a coherent transition between the southern and northern extents of the Dunstan Mountains*";
- The site is associated with the "*traditional alternative travel route for mana whenua between the east coast of the South Island* [and] *Central Otago*", while the Rise and Shine Creek catchment remains linked to gold mining in the late 19th to early 20th century, and the broader area is closely associated with high country farming – notably on the Ardgour and Bendigo Stations.

Adding my own interpretation of both the site and ONL, it is considered that:

a) The Dunstan Mountains are a distinctive and notable feature of the Central Otago landscape in their own right, which is reflective of their ONL status;

b) They make a major contribution to the natural form of the Mata-Au Clutha River valley, helping to both define it and attractively contain it;

c) Battery Hill and the natural skyline east of it are features in their own right within the Dunstan Mountains ONL;

d) The mountains' sequence of terraces and mountain landforms is highly expressive of the area's historic mountain-building and fluvial-alluvial down-cutting processes;

e) The area within and around the Rise and Shine Creek catchment displays historic modification of part of this landform sequence, in line with the historic gold mining within and near that part of the Bendigo Ophir Gold Mine site;

f) Despite this, the ONL's geomorphological character and values are largely intact;

g) Those of the site are more 'mixed', but are framed and enclosed by the natural continuum of the wider Dunstan Mountains ONL;

h) The mosaic of vegetation cover spread across the site and wider ONL has been more clearly impacted by human intervention and modification, including ongoing farming activities, which is reflected in the high level of rural character (as opposed to natural character) assoiated with much of the site and Dunstan Range;

i) That same mosaic is less intact, natural and cohesive – although this modification is less marked within the adjoining Bendigo Historic Reserve;

j) The relatively low height and predominance of seral to woody woodland species across both the site and wider mountain chain tends to 'cast a stronger light' on their landform and geomorphological structure;

k) The area's historic gold mining and sluicing sites (including the restored CIT Battery), together with the traditional route of Thomson Gorge Road and high county run associations, add a cultural veneer to parts of the site and ONL – moreso in close-up, fine-grained fashion, less so at the macro scale of the mountain range and Mata-Au Clutha River valley as a whole;

l) The Dunstan Range and parts of the site have sufficient visual presence that they contribute meaningfully to the landscape character and values of the wider Mata-Au Clutha River valley, and even its Pisa Range margins.

m) The transition down from the more natural profile and slopes of the Dunstan Range transition into the much more modified, cultural landscape of The Bend, Bendigo and Ardgour Terraces, then the floor of the Mata-Au Clutha River valley, is clearly apparent; and

n) The related 'juxtaposition' between the predominantly natural landscape of the Dunstan Range and the working rural landscape of the river corridor and its floor-plain is both clearly apparent and creates a positive tension between these contrasting landscapes.

Overall, the Dunstan Range remains sufficiently natural, outstanding, prominent and cohesive to retain its ONL status, including the central area around the Bendigo - Ophir Gold Mine site. In many longer distance views, its character and values contrast with those of the working landscape found closer to the Mata-Au Clutha River.

4.2 Perceptual and Associative Effects

The following Tables 1-3 summarise my findings and compare them with BML's:

Table 1: addresses the 10 public viewpoints for which visual simulations have been prepared, and which were also visited in the course of my March 2026 field work;

Table 2: addresses the large number of 'residential' viewpoints within 5km of the mine site (BML's Appendix 4); and

Table 3: addresses BML's 'viewing areas' more than 5km from the site (again, Appendix 4).

Although BML's report (their Table 4) summarises its findings for Viewpoints 1-10 in terms of "*Views from residential and private viewpoints*", "*Views from road and state highway users*", and "*Views from Conservation and recreation areas*", these viewpoints have been aggregated within the Tables described above, as I'm conscious that I have not visited any of the residential properties identified by BML, and I have only visited Welshtown and the Come in Time Stamper Battery of the many historic sites and tracks found near the proposed gold mine site.

In terms of my evaluation of effects for these various viewpoints and viewing sectors, I have evaluated the mine's effects with regard to:

a) The existing environment;

b) The mine's wider setting and context;

c) The mining activities proposed by MGL over the short-term (1-3 years), medium-term (4-11 years) and long-term (25 years); and

d) The related rehabilitation of landforms and water courses over the medium and longer terms, together with the proposed rehabilitation of the site's vegetation cover and habitats.

In saying this, I need to acknowledge that my assessment of the proposal was originally limited by its reliance on Google Earth / Maps imagery, together with BML's Viewpoint 1-10 simulations. All photos are 2-dimensional, rather than 3-D, while BML's photo simulations offer limited appreciation of the mine site's fuller landscape context. Furthermore, they only show the colouring and reflectivity of the proposed mine (and its surrounds) at specific times of one particular day, and don't show the movement of trucks or other activity directly linked to the much more static CIT and RAS Pits, ELF, WELF, and Topsoil Stockpiles that are shown. Finally, much as Google Earth and Google Maps images have greatly improved over time, they still appear quite grainy and lacking in real resolution when compared with photographs and (in particular) the human eye.

That initial assessment has, however, been supplemented by my site visit on the 11th March 2026, which traversed the majority of public roads even remotely close to the application site, including State Highways 6, 8 and 8A, Pukekowhai Road, Maori Point Road and Ardgour Road. It also included a trip up Blues Mines Road within DoC's Bendigo Scenic Reserve, culminating in a visit to Welshtown. The views from many of the vantage points visited in the course of that site visit are recorded in **Attachments 1-10** appended to this report, while the site visit itself has made a major contribution to this review. In particular, it provided greater appreciation of:

- The extent to which the mine would be visible from various roads and historic vantage points
- The mine site's wider landscape setting;
- The 3-dimensional qualities of that setting; and
- Appreciation of the way in which changing light conditions affect perception of that landscape.

In addition, I have had the opportunity to review two reports, which address rehabilitation of the subject site:

- *Applied Research Plan For Conservation, Management, Rehabilitation and Expansion of Cushionfield* report (June 2025), Robyn Simcock and Gretchen Brownstein of Manaaki Whenua Landcare Research; and
- *Landscape and Ecological Rehabilitation Management Plan* (October 2025), Robyn Simcock, Keith Barber and Hannah Wilson of Manaaki Whenua Landscape Research, Habitat NZ and BML.

I address these reports in more detail in Section 6 of this review, but it is relevant to note that I have some concerns about the broad-scale extent of cushionfield and herbfield removal proposed in conjunction with the mine's development and the 'experimental', seemingly untested, nature of its proposed rehabilitation. This has a slight bearing on some of my longer-term assessment ratings.

Table 1. Viewpoints for Which Photo Simulations Have Been Prepared:

	BML's Effects Ratings:			SB Effects Ratings:			
Residential & Private Viewpoints / Road & State Highway Viewpoints (Combined):							
Viewpoint:	**Year 1-3**	**Year 4-11**	**Year 25**	**Year 1-3**	**Year 4-11**	**Year 25**	**Discussion:**
VP1. Thomson Gorge Road	Very Low	Moderate	Low-Moderate	Low	Low-Moderate	Low	The Come in Time Pit and WELF, together with Ardgour Rise would emerge within the main body of the Dunstan Range, while the Topsoil Stockpile would sit within the grazed terrace area closer to Thomson Gorge Road. The various mine elements would be viewed within a wider landscape that is more cultural than natural, with a clear progression from the scarified paddocks in the foreground to the natural landforms, but still relatively depauparate land cover of the Dunstan Range. The striated profile of the CIT pit and the more 'smoothed over surface' WELF would intrude into the mottled surface of the Range, although it would, for the most part, remain visually intact and coherent. This includes its skyline. The larger Topsoil Stockpile would be more prominent, but would be contextualised by a mixture of bare, artificially patterned, paddocks in the near middle distance and power lines overhead. Long term, the mine would largely meld into the lower to middle slopes of the Dunstan Range. The working nature of much of the landscape exposed to this viewpoint would not greatly change, while the CIT pit and WELF areas would revert to land cover patterns similar to those found around them at present, albeit over decades rather than one or two years. The ONL values of the Dunstan Range would be affected to a limited / low degree in the longer term.
VP2. Ardgour Road, Lindis Crossing	Moderate	Moderate-High	Low-Moderate	Moderate	High	Moderate	Ardgour Road reveals the interplay between between the farmed environs of the terrace landscape below the Dunstan Range and the more natural (though historically modified) landform-dominated profile of the Range. There is a clear sense of transition away from the irrigated paddocks, homesteads, shelterbelts and amenity planting close to this viewpoint into the more open terrace slopes, then the much more worn and scraped, but also more ragged, profile of their hill country 'backcloth'. The proposed RAS pit, CIT pit, WELF and Topsoil Stockpile would be scattered across the last of the main body of the Dunstan Range, with the striated profile of the RAS and CIT pits, and the smoother surface of the WELF contrasting with the hill country around them. The Ardgour Rise would also be apparent cutting its way up to the crest of the Dunstan Range. Although relatively small-scale and enclosed by the rest of the Range, these scattered elements would be both elevated and obvious, especially in afternoons as the sun swings around to the west. They would contrast with the more naturally patinaed surface of the Range and appear to cut into it, while the worked, perhaps even industrial, character of the pit faces would be clearly apparent. Over time, these scars would reduce, but the verticality of the CIT pit faces would remain particularly evident. The mine would have a marked effect on the perceived naturalness, expressiveness, cohesiveness and other ONL values of the Dunstan Range while operating above ground. Some of these effects would continue to endure well after closure. The rural character of the landscape found around Ardgour Road would also be diminished by the presence of the mine, albeit to a more modest degree.
VP3. Māori Point Road	Low-Moderate	Moderate	Low	Moderate-High	High	Moderate	The existing landscape at the foot of The Bend and Bendigo Terraces near Māori Point Road is more open and has more of a 'working' character than that associated with Vp2. Even so, many of the effects identified in relation to that viewpoint also apply to Viewpoint 3. In addition, the sequence of the RAS pit, CIT pit, WELF, ELF and Topsoil Stockpile would disturb the open, 'bony, slopes of the Dunstan Range from above the top of the Bendigo Terrace to very near the Dunstan Range's skyline – almost cutting its natural sequence of hill country in two. In particular, the striated faces of the CIT and RAS would step up the Range's slopes, significantly changing the very nature of the hill country that encloses them. As for Vp2, the operational mine would have a marked effect on the Dunstan Range's ONL values, perhaps to a slightly greater degree than for that viewpoint, and these would endure into the future. The mine components would also erode the rural – mainly pastoral – character of the landscape found between Māori Point Road and the far reaches of the Bendigo Terrace below the mine site.
VP4. Ardgour Road, Tarras	Low-Moderate	Moderate	Low-Moderate	Low	Low	Low	Unlike Vps 1-3, this viewpoint would reveal scattered pockets of mining activity scattered across the lower middle slopes of the Dunstan Range, with the Topsoil Stockpile and Ardgour Rise marginally more prominent – at least in the short term. Although visible, these areas of activity would have a less obvious and fundamental impact on the the ONL. They would largely meld into the folds of the Range, moreso over time, and would have a quite limited effect on its core values. Most of the Dunstan Range would remain intact and visually coherent, even during the period of mining operations,

							and would have little impact on the rural character and values of the terrace and valley landscapes below the Dunstan Range – extending through to that part of Ardgour Road near this viewpoint.
VP5. **Jolly Road**	Low-Moderate	Moderate	Low to Low-Moderate	Low-Moderate	Moderate	Low-Moderate	Looking over greater distance from Jolly Road, the 'patchwork' of proposed mining activity would emerge as as a sequence of activity areas – from Ardgour Rise to the left (north) to the RAS pit and WELF to the south. The RAS, however, would be more apparent as the sun falls behind this viewpoint due to its mixture of open faces and ledges, while the wider sequence of activities would probably denote an area of disturbance in the midst of the much broader expanse of the Dunstan Range. Most of the Range would remain visually intact and coherent, but even at closure there would remain some awareness of the striated RAS pit, in particular. Consequently, the mine would have an adverse effect on the Range's ONL values, but these would be limited by viewing distance and the undisturbed, natural qualities of the rest of the Range. Apart from the RAS pit, most other components of the mine would progressively integrate with the surrounding hill country, so that its effects would be muted over time. However, they would not completely disappear. The mine would have a limited impact on the rural character of the farmland near Tarras, which is already notable for its grid of open paddocks flanked by coniferous shelterbelts that stretch through to The Bend and Bendigo Terraces.
VP6. **State Highway 8A**	Low-Moderate	Moderate	Low	Moderate	Moderate-High	Moderate	Viewed from SH6, the planar landscape near the Mata-Au Clutha River and both alluvial terraces beyond create a plinth on which the Dunstan Range sits: the foreground middle distance is dominated by open farmland and some pine shelterbelts, while the hill country beyond comprises a mottled sequence of ice-shorn, plucked and scraped hills and ridges. Introduction of the proposed mine would again see the RAS and CIT pits, together with the Topsoil Stockpile, ELF, WELF and, to a lesser degree, the Ardgour Rise cut across the Rnaages lower and middle slopes. Especiallywhen sunlit, they would contrast very markedly with the much more somnolent, rounded profile of the Dunstan Range – softened only by viewing distance and, in the case of the ELF, WELF and Topsoil Stockpile, by time. Even so, the mine would intrude into the ONL and would appreciably 'disturb' it, even into the foreseebale future. Although located with a landscape that is already dominated by rural production, the mine would still reduce the overall naturalness, aesthetic appeal, coherence and other values associated with the Dunstan Range ONL, although not to quite the same (high) degree as for Vps 2 and 3.
VP7. **Pukekowhai Drive,** **Queensberry**	Low	Low	Very Low	Moderate	High	Moderate	Even though Pukekowhai Road is just over 17km from the mine site, its elevated location means that it offers a spectacular overview of the Mata-Au Clutha River valley and it would be exposed to the full sequence of proposed pits, apart from the SRX, together with the proposed mine's ELF, WELF and Ardgour Rise. As for other viewpoints, the striated nature of the mine's cut pits, and their reflective vertical faces, would stand apart from the more natural, patinaed materiality and forms of the Dunstan Range that wraps around. Consequently, as for Vp6, the mine would clearly intrude into the Range's ONL overaly area, affceting it much as described for that viewpoint. Over time, the profile and scars of that incursion would soften and become less apparent, but would not entirely disappear. The only mitigating factors in this regard are viewing distance and the modified state of the river valley that partly frames the mine site – but which also contrasts with the natural sequence of hill country captured by the ONL. The mine would mark a point of significant incursion into that 'more natural' domain.
VP8. **State Highway 6**	Low-Moderate	Moderate	Low	Moderate-High	High to Very High	Moderate-High	Viewed from that part of SH6 near Vp8, the proposed mine would have effects very similar to those described in relaaion to Vp.3. However, its RAS and CIT pits, WELF, ELF, the line of Argour Rise and cuts into Battery Hill, would be even deeper and more marked. They would effectively cut the ONL in two and sever that part of it north of the Bendigo Terrace from that part to the south. The RAS pit, with its horizontal layering of cut faces and mine ledges, would create a new, completely artificial, skyline and the modification of the slopes below the top of the Come Hill would – for the first time – become clearly apparent. The level of modification would be obvious and completely at odds with the more natural values of the Dunstan Range ONL. It would also contrast with the linear profile of the Bendigo Terrace directly below the mine site. Over time, some of the cut faces would soften and become less imposing, but not entirely so. Even though this vantage point is some 13km from the proposed mine and views from it are framed by open paddocks, pivot irrigtaors and shelterbelts, the mine would very signficantly degrade part of the landscape that is valued precisely because it represents a large-scale vestige of the area's past that contrasts with its rural production 'present'. Overall, the effects of the proposed mine on this viewpoint wouuld be profound.

VP9. **State Highway 6**	Low	Low-Moderate	Low	Low-Moderate	Moderate-High	Low-Moderate	Looking southeastwards from SH8, views spread out over the margins of the alluvial terrace near the Mata-Au Clutha River, then the Bendigo Terrace and the Dunstan Range. Again, the more natural, mottled form of the hill country speard across the eastern horizon contrasts with the pastoral landscape in the foreground and middle distance. Again, this is a bare, hard, often quite 'bony' landscape. Although the main pits of the Bendigo-Ophir Mine proposal would be screened from view, this viewpoint would be more exposed to the elevated Elf within Shepherds Creek, and both the WELF and Topsoil Stockpile below Battery Hill. Even some of the mine buildings would be revealed near the mouth of Shepherds Creek. These would extend to the skyline during pit operations and would clearly highlight the presecne of the mine – amid the more gently cascading landforms of the Dunstan Range. Over time, most of the temporary earthworks and mounds would meld into the natural terrain and be very largely intergated with it. This creates a clear dichotomy between the much greater visibility and effects of the mine while open cast operations are under way, and those anticipated once the pits are closed, recontouring of the WELF and Topsoil Stockpile has occurred, and revegetation starts to mature. In the short term, the mine would have a quite obvious and adverse impact on the Dunstan Range's ONL values – to a degree, those of the rural area below it, as well – but these effects would significantly diminish after mine closure.
VP10. **Mount Pisa Road**	Low-Moderate	Moderate	Low	Low	Low-Moderate	Low	Looking across the head of Lake Duntan towards the mine site, the dark mottling of kanuka within DOC's adjoining historic and scenic reserve acts as a pointer to the site, which is backed by hill country and mounatins extending northwards. These contrast with the much more cultural landscape of open pasture, vineyards, cherry orchards and even cracked willows that wraps around the lake and lower margins of the mine site – apart from its Topsoil Stockpile on the Bendigo Terrace. The stockpile on that terrace, together with the ELF near Battery Hill, would probably be the mine's more prominent features, while the CIT pit, Topsoil Stockpile also near Battery Hill and Ardgour Rise would be visible, but more discrete. Partly screened by the vegetation and landforms of DOC's heritage reserve, the mine would still intrude into the Dunstan Range, but it would be less intrusive than in many of the other views addressed above. Once closed, the mine's ELF, Topsoil Stockpiles and even the Ardgour Rise would largely meld with the surrounding terarin and vegetation cover, so that just the top of the CIT pit would, in the long term, still appear somewhat different. As a result, the mine's effects in relation to the Dunstan Range's ONL would be relatively modest, and wold reduce. It would not appreciably alter or erode the rural character of the river valley / basin landscape laid out in front of Viewpoint 10.

In relation to Tables 2 and 3, overleaf, it is important to note that this assessment has only been able to address those BML's viewpoints which lie close to public roads (driven down in the course of my field work) and/or which are accessible via Google Earth and Maps. Other viewpoints, more distant from the public domain, are excluded from this assessment. Furthermore, I have limited the commentaries accompanying my ratings in these tables to very brief summaries of the main factors that have contributed to my ratings, due to the sheer number of viewpoints employed by BML in their Appendix 4. Notwithstanding this, quite a few of the residential viewpoints found in Tables 2 and 3 offer views that are similar to those addressed in the photos and simulations for Viewpoints 1-10. This is pointed out where it is relevant to the effects identified.

Finally, it should be noted that the symbol "-" is employed for those viewpoints that would not be exposed to landscape change around the mine site, and no adverse effects would be generated by it.

Table 2. Viewpoints Less Than 5km From the Mine Site:

		BML's Effects Ratings:			SB Effects Ratings:			
Residential Viewpoint:	**Location:**	**Year 1-3**	**Year 4-11**	**Year 25**	**Year 1-3**	**Year 4-11**	**Year 25**	**Key Factors:**
8.	**6 Thomson Gorge Road**	Very Low	Very Low	Very Low	Very Low	Low	Very Low	
9.	**269 Ardgour Road**	Low-Moderate	Low	Low	Very Low	Low	Very Low	Local terrain & vegetation near road limits views to mine
10.	**235 Ardgour Road**	Very Low	Low	Low	Very Low	Very Low	Low	Farm sheds & vegetation limit views to mine
11.	**213 Ardgour Road**	Very Low	Low	Very Low	Very Low	Low	Very Low	Shelterbelt limits views to mine
12.	**333 Ardgour Road**	Low	Low	Low	Moderate	Moderate-High	Low-Moderate	Similar to Vp.2: views to mine slightly restricted by terrain below the mine: CIT and RAS pits would be slightly less visible.
15.	**477 Ardgour Road**	Very Low	Low	Very Low	Very Low	Very Low	Very Low	Dwelling & curtelage are enclosed by trees near stream course
16.	**502 Ardgour Road**	-	Very Low	Very Low	Very Low	Very Low	Very Low	Dwelling & curtelage are enclosed by an old river terrace & vegetation
17.	**524 Ardgour Road**	-	-	-	Very Low	Very Low	Very Low	
20.	**525 Ardgour Road**	Very Low	Low	Very Low	Very Low	Very Low	Very Low	
21.	**541 Ardgour Road**	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	
22.	**546 Ardgour Road**	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	
23.	**560 Ardgour Road**	-	-	-	Very Low	Very Low	Very Low	
24.	**553 Ardgour Road**	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	The mine site is screened by intervening river / alluvial terraces
27.	**632 Ardgour Road**	Not Recorded	Very Low	Very Low	Very Low	Very Low	Very Low	
29.	**681 Ardgour Road**	Very Low	Low	Very Low	Very Low	Very Low	Very Low	
30.	**723 Ardgour Road**	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	Dwelling & curtelage is strongly enclosed by mature trees & (to a lesser extent) old alluvial terraces
35.	**2226 Tarras-Cromwell Road (SH8)**	Low	Low-Moderate	Low	Low	Moderate	Low	Similar to Vp.3, although sheds and vegetation around the dwelling restrrict views towards the mine site
36.	**2182 Tarras-Cromwell Road (SH8)**	Low	Low-Moderate	Low	Very Low	Very Low	Very Low	Dwelling & immediate curtelage is screened from the mine by a pine shelterbelt
37.	**5 Maori Point Road**	-	Not Recorded	-	No residence could be identified			Property is screened from the mine site by pine shelterbelts & The Bend Terrace
38.	**2093 Tarras-Cromwell Road (SH8)**	-	-	-	Very Low	Very Low	Very Low	Property is totally screened from the mine site by the Bendigo Terrace & vegetation
39.	**2047 Tarras-Cromwell Road**	-	-	-	Very Low	Very Low	Very Low	Property is Totally screened from the mine site by the Bendigo Terrace
40.	**2059 Tarras-Cromwell Road**	-	-	-	Very Low	Very Low	Very Low	
43.	**1878 Tarras-Cromwell Road**	-	-	-	Very Low	Very Low	Very Low	

Table 3. Viewing Areas More Than 5km From the Mine Site:

		BML's Effects Ratings:			SB Effects Ratings:			
Residential Viewing Areas:		**Year 1-3**	**Year 4-11**	**Year 25**	**Year 1-3**	**Year 4-11**	**Year 25**	**Discussion:**
B.	**769-1087 Ardgour Road**	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	The mine site is very largely screened by intervening terrain & landforms

C.	**Cemetery Road & North Ardgour Road**	Very Low	Very Low	Very Low	Very Low	Low	Very Low	Similar to Vs.4 on north Ardgour Road (but not Cemetery Road), with the mine site distantly visible but largely 'lost' amid the surrounding hill country on the edge of the Dunstan Range
D.	**Tarras Settlement (Tarras- Cromwell Road)**	-	-	-	Very Low	Very Low	Very Low	The mine site is totally screened by The Bend Terrace
E.	**Residents To the North of Tarras Settlement**	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	
K.	**Dwellings Accessed from SH8**	Low	Low-Moderate	Low	Low	Moderate	Low	Similar to Vs.9 on SH8. The mine would be largely screened by intervening landforms near its site, but the ELF, WELF and Topssoil Stockpile would be visible during operations.
L.	**Dwellings In the Lowburn Valley**	Very Low	Very Low	Very Low	Low	Low-Moderate	Low	Similar to Vs.10 on Mt Pisa Road.
M.	**Dwellings on the Mata-Au Clutha River Terrace**	Very Low	Very Low	Very Low	Low	Low-Moderate	Low	
N.	**Dwellings on MacMillan Lane, Copper Lane & Mt Pisa Road**	Very Low	Very Low	Very Low	Low-Moderate	Moderate	Low	
O.	**Dwellings at Locharburn & Lochlea on SH6**	Low-Moderate	Moderate	Low-Moderate	Moderate-High	High	Moderate-High	Similar to Vs.8 on SH6, with some shelterbelts & other vegetation partly interrupting some views towards the mine.
P.	**Dwellings at South Queensberry on SH6**	Low	Low-Moderate	Low	Moderate-High	High	Moderate-High	
Q.	**Dwellings in Central Queensberry on SH6**	Low	Low	Low	Low-Moderate	Moderate	Low-Moderate	Similar to Vs.7 on Pukekowhai Drive, although frequently the mine site & Battery Hill are partly screened by local landforms & vegetaion.
R.	**Dwellings in Poison Creek Valley**	-	-	-	Very Low	Very Low	Very Low	Most dwellings are isolated from the mine site by interrvening landforms.
S.	**Dwellings on Riverview Road & South Poison Creek Road**	Very Low	Very Low	Very Low	Low	Low-Moderate	Low	Similar to Vs.7 on Pukekowhai Drive: views are more open from Riverview Road & more constrained by local landforms & vegetation on Posion Creek Road (ratings are averaged)
T.	**Dwellings in North Queensberry West of SH6**	Low-Moderate to Very Low	Low-Moderate to Very Low	Low to Very Low	Low	Low-Moderate	Low	Highly variable: some dwellings have clear views out over the Mata-Au Clutha River valley, while others are constrained by local landforms & vegetation (ratings are averaged)
U.	**Dwellings in The Clutha River Valley**	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	The mine site is just visible from River Ridge Road, but it is extremely difficult to differentiate from the rest of the Dunstan Range; closer to SH6 it is screened by intervening terrain & vegetaion

In addition to these findings, I have (as indicated above) visited Blue Mines Road, the old Welshtown site and the restored Come In Time battery. For the most part, these would be screened from the proposed mine site, although access to the CIT Battery – currently via Thompson Gorge Road – would be lost. This would have to replaced by track access from Welshtown or nearby. Most such tracks appear to wind their way through folds in the land and manuka shrubland that dominates DoC's Bendigo Scenic Reserve. As such, it seems likely that MGL's new CIT and RAS Pits would have a low profile relative to most of this

area, although vehicle noise, the sounds of mining operations and lighting towards twilight could have an impact on the currently very transquil and more contemplative qualities of much of the reserve. However, I am not sufficiently familiar with the existing reserve and its margins to offer a view on the new mine's effects in relation to the old mine camps and heritage area.

Notwithstanding these limitations, I have concluded as follows in relation to the proposed mine's other landscape effects.

1) Many properties and public locations in closer proximity to the mine site would be wholly or largely screened from it by the layered 'pancake' landforms of The Bend, Bendigo and Ardour Terraces, together with other side ridges and hillocks that descend from the main spine of the Dunstan Range. This includes properties at the foot of the aforementioned terraces, together with the settlement of Tarras and even many of the residential properties lining Ardgour Road. For many such locations, typified by BML's Viewpoint 1, there would be limited exposure to the RAS and CIT pits, so that more visual emphasis would instead fall on the ELF, WELF and Topsoil Stockpiles, which would have less of an effect in the longer term. In some cases, typified by Viewpoint 4, the individual mine components would remain quite small-scale and scattered, without threatening the overall coherence and integrity of the Dunstan Range.

2) Such close-up exposure would also have a limited impact on the Range's fuller inventory of ONL values, and the sense of place associated with the Bendigo area and Tarras. In part, this assessment is also influenced by the historic presence of open-pit mining in the area of the proposed mine, albeit of a quite different scale and level of sophistication. It is difficult to forget that the Bendigo area has strong associations with Central Otago's gold fields.

3) Even so, some other locations in reasonably close proximity to the mine site, would be impacted to a much more significant degree. Hence, the ratings for Viewpoint 2 (Ardgour Road, Lindis Crossing) and Viewpoint 3 (Māori Point Road) would be much higher. In relation to these viewpoints, the operational effects would be high – or 'significant' – tailing off to a more moderate level after closure of the open-cast mine. In views from these and similar locations, the fuller array of mine pits, engineered landforms, earth stockpiles and the Ardgour Rise would typically be visible, stretching very close to the Dunstan Range's skyline and, in the case of Viewpoint 2, breaching it. Although some of these effects would reduce after the mine is closed, the horizontally cut and striated faces of the main pits would remain visible, highlighted at times by the afternoon and setting sun. As indicated in my assessment for both viewpoints, this would have a profound effect on the aesthetic coherence and appeal of the Dunstan Range, the Ranges' overall naturalness and integrity, and – overall – its value as an ONL. Reflecting these concerns, my ratings for these viewpoints are higher than BML's.

4) In addition to these direct effects, the mine would also have a significant impact on the rural character and amenity values of the eastern Mata-Au Clutha valley landscape that is viewed

in conjunction with the mine. Inevitably, this would affect both local and visitor perceptions of the area.

5) Further away from the proposed mine, its effects would be moderated by the increased viewing distances to the subject site and both local landforms and vegetation cover that interrupt views towards the subject site. However, these factors are often counterbalanced by the more open and expansive nature of views across the Mata-Au Clutha valley and the increased elevation of many public and private vantage points that look towards the Dunstan Range – including sizeable areas of lifestyle development on the flanks of the Pisa Range near Queensberry.

6) This variable, but often quite high, level of visual interaction with the proposed mine site is reflected in the ratings for Viewpoints 6 (SH8A), Viewpoint 7 Pukekowhai Drive) and Viewpoint 9(SH6) that 'top out' at a moderate-high level, while Viewpoint 8 (SH6) has a rating of high to very high – again while the mine is in operation. The last of these ratings achieves this level in response to the mine appearing to sever the Dunstan Range with its combination of pits, engineered fill and topsoil stockpiles. Even though this level of effect would reduce after the closure of the mine, the residual pit faces would still 'cut through' the Range's profile and continue to contrast with its more natural combination of landforms and vegetation cover for many years to come.

7) Such an incursion would have a very significant impact on the integrity of the Dunstan Range, both physically and visually, affecting its appearance and character, perceived naturalness, aesthetic appeal, cohesion, unity, and other values. Inevitably, such effects would 'spill over' into the values associated with the wider Mata-Au Clutha valley and its backcloth of mountains and hill country. Over recent decades, the more natural qualities of the Dunstan, Pisa and other mountain-hill ranges spread around the valley have afforded a degree of counterbalance to the increasingly modified and productive character of its valley floor and terraces. The proposed mine would 'break through' this frame and thereby change the balance between natural and cultural landscapes within and around the valley corridor. Although the level of exposure to the mine from on and near SH6 would be variable, and in places intermittent, it would nonetheless have a meaningful and adverse impact on perception of the Dunstan Range and its ONL.

8) More generally, the Mata-Au Clutha River is enclosed by a series of ONLs, Outstanding Natural Features (ONFs), and Significant Amenity Landscapes (SALs). In my assessment, both the shorter range exposure to the Bendigo-Ophir Gold Mine that is discussed in para.s 3 and 4, above, and its effects on more distant views across the valley, would erode some of the value that is currently attached to these landscapes precisely because of the way in which it interrupts the balance between the valley system's more natural and more cultural /halves'. Although it might be argued that the modified state of the Mata-Au Cluhta River valley floor and many of its terraces is conducive to further modification, the scenario supported by the

Dunstan Range's ONL status is that it provides contrast with, and counterpoint to, the more developed valley floor and margins. Erosion of that naturalness, together with the coherent character and aesthetic appeal of the Dunstan Mountains, would erode the range's own value, but also that of the wider Mata-Au Clutha landscape which benefits from this interplay.

9) Irrespective of how successful the proposed site rehabilitation ultimately is (or otherwise), the transition back to a more natural, weathered and settled form would not be a short-term exercise, even moreso if the proposed herbfield restoration either fails, is very slow or is patchy in terms of its outcomes. Even then, public awareness of the RAS Pit faces and benches would endure and would have an impact on public perception of part of the Dunstan Mountains would endure for decades to come.

10) In relation to the effects of the Ardgour Rise replacement for part of Thomson Gorge Road, I have addressed the new road as a component of the wider mine development. Thus, as is indicated in some of my commentary above, its effects are considered as part of the broader project. At the same time, the creation of "Ardgour Rise" would remove the existing road from the mine site and relocate it to the north of the Shepherds Creek, beyond a ridge that defines its catchment edge. As a result, those using the new 4WD road would also be substantially screened from the mine, limiting its impact on them.

Cumulatively, the proposed mine would have a level of effect that is at least Moderate-High in relation to large stretches of SH6, and parts of SH8, SH8a, Ardgour Road, Maori Point Road and Pukekowhai Road. In other words, it would have a 'significant' or nearly significant impact on nearly all of the public road network around Bendigo and Tarras – if only during the main 'open cast' phase of mine development and activities. Although effects would be more limited in relation to most private residences close to the mine site, this would not be the case for those on and near the far side of the Mata-Au Clutha River valley and the Pisa Range above Queensberry. Moreover, the mine would be exposed to all local residents in the course of travelling to and past the mine site. Over time, it would become inextricably linked to the Bendigo - Tarras locality. Inevitably, this would have an impact on public perception of the area's sense of place and identity.

Taking these factors into account, I have reached conclusions that are different from those of BML, whose assessment (both in the application and in response to CODC's RFIs) does not, in my view, adequately address many of the concerns that I have identified in relation to the proposed mine, including the way that the various components of the proposal would, in some views, appear to cut through the Dunstan Range and sever the main body of its hill country continuum. In my opinion, this is not consistent with protection of the Range's values and integrity as a whole. I further consider that the cut faces of the RAS and CIT pits would continue to interrupt and intrude into the main body of the Dunstan Range ONL for decades to come, irrespective of the ledge-top planting, pest exclusion areas, and other mitigation measures proposed.

Finally, it is my opinion that awareness of the mine would have an impact on the rural character and sense of place associated with the Bendigo-Tarras area. The former would be diminished, while public awareness of the mine would inevitably serve to reshape wider community perceptions of the area's identity. This may, as a result, also affect current attempts at branding Bendigo as a distinct wine area with its own *terroir*, but this is not an area that I can offer and expert opinion on.

4.3 Biophysical Effects

In my opinion, BMLs' sections 6.5, 6.5.1, 6.5.2 and, in particular, 6.5.3 are very useful in providing an understanding of the biophysical changes anticipated for the mine site and its margins. The geophysical changes to the Shepherds Creek and the Rise and Shine Creek catchments would be profound, due to amalgam of open-cast pits, ELFs, TSF, stockpiles, silt ponds, haul roads and plant proposed. These effects would be mitigated by two key factors:

- The strongly enclosed and physically contained nature of the two stream valley systems most impacted by the proposed mine; and

- The already diminished ecological and habitat values of much of the site – subject to past mining and, perhaps of more overall importance, its use for pastoral farming.

As a result, I generally agree with BML's section 6.5.3 where it states that:

> *During startup and and mining activity phases of the mine, earthworks, transient presence of vehicles, and structures will contrast with the broader high country rural landscape, with modification to the underlying landform, and vegetation patterns which are reflected and valued in other areas of the ONL. On closure, the Rise and Shine and SRX pits will remain open, however rehabilitation to the edges of these elements has been proposed in addition to the removal or rehabilitation of remaining mining infrastructure seen in the context of a broader area of native vegetation restoration.*

In my view, the key points to emerge from all of the BML's description of the proposed mine are that its geophysical effects would be extensive and, in all likelihood, of a high order. This includes the diversion of Shepherds Creek and modification of the Rise and Shine Creek. Conversely, the proposed changes to its vegetation-land cover, would have a more limited effect, while the establishment of the proposed pest exclusion areas and the wider mine rehabilitation proposed upon the closure of open-cast operations should ultimately have a positive effect.

However, this assessment is also reliant on the eventual rehabilitation of the mine site, as is discussed in Section 6 of this report. And, as that section makes clear, I now have some concerns about the viability and potential effectiveness of the proposed rehabilitation, much of which appears to be reliant on 'experimental' and seemingly untested restoration of the existing cushionfield - herbfield that covers some 92ha of the subject site.

On balance, I consider that the MGL proposal would give rise to biophysical effects that are of a moderate-high order.

4.4 Natural Character Effects

As indicated in p.10, above, I am satisfied with BMLs' approach to the matter of natural character effects on the Shepherds Creek and Rise and Shine Creek systems. Accordingly, I am comfortable with BML's assessment that the proposed mine would generate natural character effects that peak at a moderate level for the Rise and Shine Creek, and at a moderate-high level for Shepherds Creek.

5. Night-time Effects

Returning to the matter of night-time effects, I have already addressed the RFI response from Cosgroves and BML in Section 2.4, above. In addition,I have reviewed the CODC and Land Use Consent Conditions. In brief, these appear likely to help suppress the effects of much of the lighting that would be employed within the mine site. Howver:

- They exclude controls over headlight wash;
- In allowing luminaires to be aimed horizontal with the ground and away from external locations Roads, residential properties, etc), they would still accommodate the illumination of the working faces and areas associated with the CIT and RAS Pits, together with the WELF and ELF; and
- Shielding of lights does not appear to be required for mobile outdoor lighting, of precisely the kind that would be employed in working mine pits and on their faces.

Consequently, much as the lighting associated with the mine's major fixed plant and offices would be largely screened from external vantage points, the main working areas of the mine would not be. As a result, it is anticipated that operations associated with the RAS and CIT pits, the ELFs, TSF, stockpiles, silt ponds, and haul roads would all be lit up, to varying degrees, over time and this would still result in attention being drawn to the gold mine for the duration of open-cast operations. Throughout this period, it is anticipated that the mine would have a moderate to high level of effect, simply because of the way in which its 'industrialised' working nature is exposed to a wide range of areas within the Mata-Au Clutha River valley. It would clearly contrast with the much darker and more recessive character of the rest of the Dunstan Munatins and most areas around it.

Once that phase of operations comes to a close – after 5 years approximately – the lighting would be more tightly focused on the area around the haul road and plant within the much more (physically and visually) contained Shepherds Creek catchment, and the offices and compound on part of the Ardgour Terrace. At this point, the level of effect is expected to reduce to a low or low-moderate level, mainly arising from the reflected and ambient light in and around those operational areas creating a visible halo within the creek valley and on part of the adjoining terrace.

Overall, I am of the opinion that MGL's more permanent infrastructure and underground mining operations may well have effects that are consistent with the Dark Sky Reserve requirements addressed in Section 8.2 of Cosgrove's report, but that the various components of its open cast operations would not be able to do so.

6. Site Rehabilitation

The proposed rehabilitation of the mine site is a significant factor in addressing the proposed goldmine's effects in total – both short and long-term. In relation to this, I have reviewed the October 2025 *Landscape and Ecological Rehabilitation Management Plan* (October 2025) prepared by Robyn Simcock, Keith Barber and Hanah Wilson (Manaaki Whenua Landscape Research, Habitat NZ and BML). That report outlines its Rehabilitation Approach in Sections 6.1 and 6.2, before explaining its Rehabilitation Objectives in Sections 7.1 to 7.4. The following excerpts then highlight the three key phases of mine development and associated rehabilitation:

> ***Phase 1 (Years 0-1) - Initial Startup***
>
> *Establish mine infrastructure, construction camp, process plant and TSF embankment. Critical early activities include identifying permanent edges to avoid high-value species impacts, enriching areas along those permanent edges (with tussock and rock), initial plant pest control, salvaging high-value vegetation (as live direct transfer and as dead material), and stockpiling vegetation with soils, as rocks and overburden suitable for root zones ('brown rock). The Western ELF will be completed as the first major rehabilitation area with suitable slopes for cushionfield and spring annual herb trials. The Western ELF will also be used to establish rock stacks, rock pits, and associated planting which will then be monitored to assess natural development. At least 1 ha of wetland vegetation communities from Shepherds Creek will be transferred to create permanent wetland (e.g. Ardgour Terrace wetland) and at least 25,000 tussocks transferred to live storage for replanting on rehabilitated surfaces. Permanent and temporary stream diversions and sediment treatment ponds will be constructed, with permanent diversions enhanced for aquatic invertebrate values, including enriching adjacent undisturbed edges with translocated rock, tussock and sedges at the time diversions are constructed.*
>
> ***Phase 2 (Years 1-10) - Main Mining***
>
> *Complete RAS and SRX pits with progressive rehabilitation of pit edges and available final landforms on Shepherds ELF and SRX ELF as they become available. Complete CIT if conditions related to cushionfield and spring annual herbs are met. The temporary Site Workers Camp will be dismantled and reinstated to productive pasture during this phase. Most of the enrichment planting and regeneration of MRZs occurs during this phase to develop the diverse, native dominant ecosystems wrapping around the mined areas. This phase focuses on maintaining rehabilitation momentum while active mining continues, tracking the quality and quantity of rehabilitation resources in stockpiles to ensure adequacy for closure, monitoring development of early rehabilitation to optimise techniques used in final closure, and monitoring regeneration in MRZ to ensure meeting closure conditions.*
>
> ***Phase 3 (Years 10-30) - Final Closure***
>
> *Implement the final closure sequence with the largest areas of rehabilitation occurring on TSF, Shepherds ELF, main haul roads, RAS and SRX pit haul roads and associated stockpiles. Substantial areas of final landforms cannot be completed until tailings deposition stops and workshop facilities on Shepherds ELF are decommissioned. This phase represents the most intensive rehabilitation period.*

Sections 10 and 11 of the report then outline the strategy and actions required to implement the progressive rehabilitation of the mine site, including its mosaic of cushionfield and taramea herbfield, kowhai, shrubland, and tussock grassland. Overall, the approach outlined appears to be comprehensive, involving both the recovery and direct transfer of plants from the site, new planting, the formation of rock stacks and rubble piles to create lizard

/ skink habitats, and creation of a new stream corridor and wetlands – mostly in the Shepherds Creek catchment. Much of the focus for these works would also fall on the proposed ELF, WELF and TSF.

However, in addressing the rehabilitation processes, I have also had regard to the *Applied Research Plan For Conservation, Management, Rehabilitation and Expansion of Cushionfield* report (June 2025). Prepared by Robyn Simcock and Gretchen Brownstein of Manaaki Whenua Landcare Research, this report focuses more specifically on the site's herbfields (including cushionfields). This identifies the potential loss of up to 92ha of herbfields and in Section 1.2 states that key objectives of the proposed mitigation measures are to:

- *increase the areal extent and improve the ecological condition of cushionfields within the managed landscape; and*
- *rehabilitate cushionfield in relatively small areas on engineered landforms within the DDF, with the intent to scale up to larger areas if outcomes are favourable.*

Even so, the report then makes the following point (p.1):

> *Whether these mitigation goals can be achieved is currently unknown. This has driven the proposals in the ARP to obtain and action that mitigation once success can be determined. There is little existing research, knowledge or experience of management actions which have attempted to understand cushionfield communities and/or achieve these goals. Applied research is therefore needed to reduce the uncertainty and define and refine the management interventions that Matakanui Gold will need to sustain and expand cushionfield.*

At Section 3.2, it is further stated that (p.7), "*Cushionfield is the highest-value ecosystem in the Site*", while in Section 6.3 ('Applied Research Plan for Cushionfield'), a programme of research is outlined into the health, distribution, then rehabilitation of the cushionfield communities. It is then indicated (p.18) that the first stage of this research was supposed to occur in the Spring of 2025, followed by further work in the Summer of 2026 – as the precursor to development of an "*experimental design*" (p.20) for cuhshionfield rehabilitation. However, it is unclear if that research has occurred. Similarly, I am uncertain if further stages of research recommended for Autumn-Winter 2026 and the Spring of 2026 have been programmed for implementation.

As a result, I am left with uncertainty over the workability and likely effectiveness of the proposed cushionfield / herbfield rehabilitation, even though this is a major component of the Landscape Mitigation proposed by Manaaki Whenua Landcare and BML. Relying on an 'experimental design' for such rehabilitation, without any apparent direction from recent (updated) research, is of real concern and raises questions over the viability of the longer-term landscape outcomes relied on in both BML's assessment of landscape effects and, to a degree, my review of the MGL proposal.

7. Key Findings

Overall, the magnitude and nature of the effects derived from the proposed gold mine would be highly variable. In particular, they would be affected by a range of factors, including viewing angles and distances, the relative elevation of the mine site, intervening terrain and vegetation, and the way in which the site and Dunstan Range are 'presented' to different vantage points and the long-term rehabilitation of the site, uncertain as those measures may be. Focusing more directly on the key attributes and values identified by both BML and me, I consider that the proposed gold mine would give rise to the following effects:

Effects on Key Attributes:

- Permanent modification of the Dunstan Mountains' landforms and geomorphic character, including the related loss of some of their expression of '*tectonic and glacial formative processes*' near the mine site;
- Modification of the Shepherds Creek and, to a lesser extent, the Rise and Shine Creek;
- Displacement of the Dunstan Mountains' vegetation cover for 10 or more years;

Effects on Key Values:

- Disruption of the Dunstan Mountains' '*highly intact mountain sequence*' until restoration of the main pit sites has been completed;
- The medium to longer term erosion of the '*high level of perceived naturalness*' currently associated with the Dunstan Mountains,
- The medium to longer term erosion of the mountain chain's aesthetic appeal and cohesion;
- The medium to longer term erosion of its perceived expressiveness, legibility, memorability and transient values;
- Erosion of Battery Hill's value as a focal point and feature within the local landscape;
- The erosion of some of the value currently associated with Matakanui as '*a mahinga kai site and traditional travel route through the Rise and Shine Valley*'; and
- Erosion of some of the historical value attached to part of the Thomsons Gorge Road route and the high county runs of Ardgour and Bendigo Station.

The loss of perceived intactness, cohesiveness and naturalness, together with other 'ONL values' listed above, is important because it adversely affects the range's integrity and potentially brings into question whether they would retain 'sufficient naturalness' and still be outstanding enough to retain their status as an ONL – at least near the mine site over the next 10 plus years. This could conceivably result in the ONL being 'cut in two' around the site for a significant period of time.

Such changes would also adversely affect the sense of place and identity associated with the wider Dunstan Mountains, as well as the Ardgour and other terraces also near the mine site, the community hub of Tarras to the north, and the much wider Mata-Au Clutha River valley that is also exposed to it. They could also affect the Bendigo Historic Reserve, although it appears that much of that reserve would be screened from most of the CIT and RAS pits, while there is also a degree of synergy between the proposed mine activities and the much more historic workings and stamper battery close to the gold mine site.

In addition to the daytime effects summarised above, the lighting of the CIT and RAS pits, together with related haul roads would amplify the presence of the gold mine during twilight and night-time hours. For the 5 plus years duration of both open-cast pits, the proposed lighting appears likely to point a 'figurative finger' at the gold mine and exacerbate its contrast with the rest of the Dunstan Mountains, together with the old alluvial terraces and valley floor close to the subject site. Again, such effects would be variable, but significant for the period of open-cast operations; less so after that period.

8. Conclusions & Recommendations

In conclusion, I have determined that the effects of the proposed mine would be very limited in relation to the natural character values of Mata-Au Clutha River and its margins, with such effects effectively limited to the immediate confines of the Shepherds Creek and Rise and Shine Creek catchments.

Its effects on residents living near the mine site, and their amenity values, would also be quite modest in general, although exposure to the proposed mine from a range of local roads would inevitably have an impact on the sense of place associated with the Bendigo - Tarras locality. This includes the ongoing movement of vehicles in and out of the mine site, which would particularly affect local residents living near Thomson Gorge Road, although I have not tried to measure or directly assess such effects.

Paradoxically, the mine would have much more of an impact on views from locations areas across the Mata-Au Clutha River valley – near Queensbury, Locharburn and Lochlea – and such effects appear likely to be exacerbated at and near night-time with lighting of the CIT and RAS Pits, the proposed ELF, WELF, stockpiles, TSF, and mine haul roads. The areas affected in this regard include pockets of lifestyle development and a broad sweep of both farms and horticulture blocks on the margins of the Pisa Range and the Mata-Au Clutha River – including related housing.

Of most significance, however, would be the proposed mine's effects on the Dunstan Mountains ONL – which were not, in my opinion, adequately addressed in BML's original landscape assessment. Again, such effects would not be consistent, but views of the proposed open-cast pits, artificial landforms and mining activities from the areas just described, together with parts of State Highways 6, 8 and 8A, would be bound to have an adverse effect on the residual naturalness, cohesion, aesthetic appeal and wider values of the Dunstan Range. They would erode the integrity of a central part of the Dunstan Range, and would have an impact on the public 'face' and identity of the Bendio - Tarras area.

Overall, these effects would be significant, and it is my assessment that they would be inconsistent with various statutory instruments applicable to the site, the Dunstan Mountains and Bendigo – from s. 6(b) of the RMA, to Objective NFL-01 of the Proposed Otago Regional Policy Statement, and Objective 4.3.2 of the Central Otago District Plan.

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