BEFORE THE COMMISSIONERS APPOINTED ON BEHALF OF CENTRAL OTAGO DISTRICT COUNCIL

Under	The Resource Management Act 1991 (the **Act**)
In the Matter	of Resource Consent Application RC250077 for the purpose of mining at Sandy Point, Queensberry
Between	**AWA KOURA MINING LIMITED** **Applicant**
And	**CENTRAL OTAGO DISTRICT COUNCIL** **Territorial Authority**

BRIEF OF EVIDENCE OF MIKE MOORE (LANDSCAPE ARCHITECT)

DATED 13 OCTOBER 2026

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BRIEF OF EVIDENCE OF MIKE MOORE (LANDSCAPE ARCHITECT)

Introduction:

1. My name is Michael William Moore. I am a landscape architect based in Dunedin.

2. I have a Bachelor of Science degree (BSc) in Geography from University of Canterbury, a Post Graduate Diploma in Landscape Architecture (DipLA) from Lincoln University, and a Master of Regional Resource Planning (MRRP) from University of Otago. I am a registered member of the New Zealand Institute of Landscape Architects (NZILA).

3. Early in my career I was employed as staff landscape architect for Palmerston North and Dunedin City Councils. I have operated my own consultancy since 1994.

4. My work involves both landscape design and planning and has a particular emphasis on landscape assessment. I have prepared numerous natural character and / or landscape assessments on plan changes and on projects of various scales and character around New Zealand, including dwellings, subdivisions, port expansions, industrial zones, wind farms, cycle trails, mines, riverbank and coastal protection structures, and hydro-electric developments. I have also been involved in natural character and landscape assessment work for Councils to assist with the development of District and Regional planning provisions, in particular, Dunedin, Clutha, Waitaki and Gore District Plans, as well as a coastal natural character and landscape assessment study for the Otago Regional Council.

Code of conduct for expert witnesses

5. I confirm I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note

2023 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope of evidence

6. My evidence addresses the landscape effects of the proposed mining and is structured as follows:

   (a) Background

   (b) Landscape effects assessment summary

   (c) Visual effects from private viewpoints

   (d) Comments on the Peer Review report by Mr Milne

   (e) Conclusion.

Background

7. I was commissioned by the applicant to prepare a landscape effects assessment (LEA), and my report dated 21 February 2025 was included with the application documentation. The LEA was peer reviewed by Mr Tony Milne[1] and I provided some further information comment in a memorandum dated 8 May 2026.

8. My assessment follows the concepts and principles outlined in the New Zealand Institute of Landscape Architects (NZILA) Landscape

[1] Rough Milne Mitchell, Peer Review Report dated 26 June 2026

Assessment Guidelines[2]. It has been informed by a site visit on 29 November 2024. I undertook a more recent site visit on 9 October 2026 which focussed on the visual effects from the surrounding properties.

Landscape effects assessment summary

9. My assessment is outlined in full in my report which forms part of the application documentation and will not be repeated here, however, the following is a brief summary of the key points:

10. The property is approximately 70ha in area and is located between the Clutha River / Mata-Au and Luggate Cromwell Road (State Highway 6) near Queensbury. The land proposed to be mined is approximately 50 ha of river flood plain under exotic pasture cover and is separated from the river by Crown land of varying width. The wider landscape context is the Upper Clutha Valley and the dominant feature in this landscape is the willow-lined Clutha River / Mata Au which has carved terraces into glacial outwash surfaces. In recent years the lower parts of this landscape, including Queensbury and the river terraces across the river from the site, have become significantly more settled and domesticated with subdivision into smaller rural lots.

11. The property is not within areas mapped in the CODP as outstanding natural landscapes (ONL) or significant amenity landscapes (SAL), but the values outlined in the CODP for rural zoned areas are applicable. Values specifically articulated in the CODP relating to the rural landscape are essentially natural character (naturalness) and open space (openness), with particular emphasis on open natural character of the hills and ranges, skylines, prominent places, natural features and terraces[3]

[2] Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.
[3] CODP Objective 4.3,3 and Policy 4.4.2.

12. This landscape has rural character and amenity values based on rural land use, modest impact of built form and openness, and legibility of natural landforms. Recent and on-going subdivision and associated domestication are modifying these values to an extent. With regard to rural land use, I note that the CODP provides for quarrying as a discretionary activity in the RRA[4] and that in a recent decision[5] the Council accepted that quarrying is anticipated as a category of rural activity.

13. Features of the proposed activity that will mitigate adverse landscape effects include buffer zones adjacent to Clutha River / Mata Au and areas of kanuka, control over the size of the actively worked area, immediate landform and pasture remediation, and controls over temporary structures. The maximum 3-year timeframe for the works also limits the degree of adverse effects temporally.

14. Given the setback proposed from the Clutha River / Mata Au, I consider that the site does not extend to the river margin and that adverse effects on the natural character of the river and its margin are avoided.

15. In terms of landscape effects, the proposed mining will be temporary and for a short duration. In spatial extent its effects will be contained by limits to the size if the actively worked area and the intention to rehabilitate progressively. Limits and setbacks imposed will ensure that adverse effects on the Clutha River / Mata-Au margins and indigenous trees are avoided. Conditions are proposed to ensure reinstatement of floodplain landform character and pasture.

16. The visual effects on users of adjacent roads and on nearby residents will likewise be mitigated by the temporary, short term, and spatially limited nature of the activity. Whilst the activity overall is likely to have a

[4] CODP Rule 4.7.4 i
[5] RC 250044 Road Metals Company Ltd, 2004 Luggate Cromwell Road, Cromwell

duration of three years, the effects in any one part of the site are much less.

17. Overall, it is my assessment that effects on landscape values will be adverse / moderate-high – adverse / very low during the operation and adverse / very low following final rehabilitation.

Visual effects from private viewpoints

18. Many submitters have raised adverse visual effects from their properties as an issue and visual effects from private viewpoints in the area surrounding the site is the key landscape related issue arising in the peer review report by Mr Milne and carried over into the S42A report. Mr Milne considers that additional assessment of the visual effects from private properties surrounding the site is required and the S42A report requests that assessments from submitters properties are provided for the hearing[6].

19. Visual effects are a '*a consequence for landscape values as experienced in views'.*[7] I assess the relevant valued landscape attributes in this case as naturalness and openness associated with the rural character of the site, including the presence of some indigenous vegetation. It is relevant to note that the current rural character of the site will be modified by the development associated with the rural subdivision that is already consented and part of the existing environmental baseline.

20. In response to the S42A report, I have carried out assessments of the visual effects of the proposed mining on landscape values as experienced from the properties of all the submitters within close – medium proximity to the site. Where these properties contain a dwelling, my assessment is based on effects from within or near this. I

[6] S42A report paragraph 58
[7] Te Tangi a te Manu paragraph 6.08

acknowledge that the effects of the activity can be experienced from other parts of the properties (both closer and further removed from the site) but consider that the dwelling vicinity is likely to be the most significant part of each property in terms of usage.

21. My assessment is not based on visits to those properties (which are private), but on desktop analysis (aerial photographs / google earth, topographic maps), views from the public roads adjacent to the properties, and views back toward the properties from the site. **Figures 1A** and **1B** illustrate the location of the properties / dwellings considered, in relation to the site.

22. Below, I address the nature and degree of the visual effects from the various submitter's properties. In all cases I consider that the nature of the effect of the mining whilst operational, will be adverse. This is due to the introduction of mining activity which disturbs the vegetation cover and landform for a period, albeit within a spatially restricted (actively mined) area.

23. Important factors that influence the degree of the adverse effects include the proximity of the activity (the relative scale of the disturbance / activity in the view), the degree of screening by landform or vegetation, and whether the works will be within a main outlook of a dwelling.

24. The proposed mining activity and associated disturbance to natural landform, will move around, zigzagging to be closer or further away from the viewpoints at it progresses from south – north through the site. This means that the effects will vary in degree from the affected viewpoints over the period of the mining operation due to variable proximity and degree of screening. My assessment below acknowledges this dynamism and estimates the length of time that the proposed activity will have impacts from specific viewpoints that are:

(a) significant (i.e. effects on landscape values are high or very high),

(b) more than minor (i.e. effects on landscape values are moderate – moderate-high), or

(c) minor / less than minor / nil (i.e. effects on landscape values are nil, very low, low or low-moderate).

25. In all cases, following final rehabilitation, I consider that the residual effects of the proposed mining will be nil – very low given the reinstated landform and pasture. Some exotic trees will have been removed but the character of the site will change anyway as the development associated with the subdivision proceeds.

Submitters properties / residences – Visual effects assessment

26. **54 River Ridge Road**

Degree of adverse effect	Timescale
Significant	None
More than minor	None
Minor or less / Nil	36 months

(a) **Relevant factors**

The dwelling is situated on the second terrace landform back from the river approximately 30m above the level of the nearest part of the site across the river. It orientates mainly to the north-west but does not appear to have views down onto the lower terrace level of the site due to screening by the lower terrace landform. The dwellings at 79 and 85 River Ridge Road are also between this dwelling and the site.

(b) **Effects description**

No visual effects.

27. **63 River Ridge Road**

Degree of adverse effect	Timescale
Significant	None
More than minor	18 months
Minor or less / Nil	18 months

(a) **Relevant factors**

This is a double story dwelling situated on a river terrace approximately 30m above the level of the nearest part of the site across the river. It orientates mainly to the north-west with one window looking south-west and has views over southern and central parts of the site, albeit with partial screening by tussock covered mounding landscaping from ground / ground floor level. Views of the northern part of the site are screened by landform, and vegetation and do not appear to fall within the main outlook. The proposed mining will be approximately 320m distant from the house at its closest point.

(b) **Effects description**

Initial mining in the southern part of the site (including the Stage 1 depot) will be visible but not within the main outlook orientation of the dwelling and will be screened to some extent by the mounding landscaping on the property. The activity will be most visually prominent as it moves through the central part of the site with greatest visual impact occurring when it is closest, within the main outlook, and unscreened by riverside willows and mounding. I consider that the mining will have more than minor effects but that significant adverse effects will be avoided by the screening mitigation of mounding and riverside trees, and the viewing distance / restricted scale of the activity. Visual effects

will reduce as the activity proceeds northward to be at greater distance from this dwelling, beyond the main view orientation, and often screened by riverside trees.

28. **67 River Ridge Road**

Degree of adverse effect	Timescale
Significant	None
More than minor	18 months
Minor or less	18 months

(a) **Relevant factors**

The buildings are situated on a river terrace approximately 25m above the level of the nearest part of the site across the river. They orientate mainly to the north-west and have views over the central part of the site. Views of the southern part of the site are screened by the terrace landform and views to the northern part are screened by riverside vegetation. The proposed mining will be approximately 430m distant at its closest point.

(b) **Effects description**

Initial mining in the southern part of the site will be screened by landform. The Stage 1 depot will be visible but likely to have some partial tree screening. The activity will be most visually prominent as it moves through the central part of the site with greatest visual impact occurring when it is closest, within the main outlook, and unscreened by riverside willows. I consider that significant adverse effects will be avoided by the viewing distance / restricted scale of the actively mined area, and the partial screening provided by riverside trees. Visual effects will reduce as the activity proceeds northward to be at greater distance from this dwelling and often screened by riverside trees.

29. **79 River Ridge Road**

Degree of adverse effect	Timescale
Significant	None
More than minor	24 months
Minor or less / Nil	12 months

(a) **Relevant factors**

The dwelling is situated on a river terrace approximately 25 – 30m above the level of the nearest part of the site across the river. It orientates mainly to the west and has views over the central part of the site. Views of the southern parts of the site are screened by the terrace landform, and riverside vegetation screens parts of the northern site. The proposed mining will be approximately 510m distant from the house at its closest point.

(b) **Effects description**

Initial mining in the southern part of the site will be screened by landform although the Stage 1 depot area will be visible. The activity will be most visually prominent as it moves through the central part of the site with greatest visual impact occurring when it is closest, within the main outlook, and unscreened by riverside willows. The willows will provide some screening at times I consider that the mining will have effects that are more than minor but that significant adverse effects will be avoided by the intermittent screening mitigation of riverside trees and the over 500m viewing distance / restricted scale of the actively mined area. Visual effects will reduce toward the end of the activity as the mining is at greater distance and more screened by riverside trees.

30. **85 River Ridge Road**

Degree of adverse effect	Timescale
Significant	None
More than minor	18 months
Minor or less / Nil	18 months

(a) **Relevant factors**

The dwelling is situated on a river terrace approximately 25 – 30m above the level of the nearest part of the site across the river. It orientates to the north-west and has views over the central and northern parts of the site, albeit with some screening by riverside trees. Views of the southern part of the site are screened by landform. The proposed mining will be approximately 470m distant from the house at its closest point.

(b) **Effects description**

Initial mining in the southern part of the site will be screened by landform. The activity will become visible as it moves into the central and northern parts of the site with greatest visual impact occurring when it is closest, within the main outlook, and unscreened by riverside willows. The willows will provide some screening at times. I consider that the mining will have effects that are more than minor but that significant adverse effects will be avoided by the intermittent screening mitigation of riverside trees and the mainly over 500m viewing distance / restricted scale of the actively mined area. Visual effects will reduce toward the end of the activity as the mining is at greater distance and more screened by riverside trees.

31. **738 Luggate Tarras Road**

Degree of adverse effect	Timescale
Significant	None
More than minor	12 months
Minor or less / Nil	24 months

(a) **Relevant factors**

The dwelling is situated on a low river terrace approximately 5m above the level of the nearest part of the site across the river. It orientates largely to the west and there is significant (but not complete) screening of the site by exotic trees on both sides of the river. The proposed mining will be approximately 280m distant from the house at its closest point.

(b) **Effects description**

Given its low elevation and location, only the mining at the northern end / later stage of the project will have visual impacts of any note from this dwelling. In summer months there will be significant screening by riverside trees. In winter, as the trees are deciduous, visibility will be greater but still filtered by the vegetation. There will be some places where activity will be seen through gaps in the tree screen. The low viewing angle toward the site from this dwelling coupled with the low heights of the stockpiles and tailings heaps and the fact that the gold screen plant will be at a lower level than the surrounding land will also assist to minimise visual impacts. Given the relatively close proximity but also the degree of screening I assess effects as more than minor at the later stages of the works, but not significant.

32. **A & B Kane property 3 RD Cromwell**

Degree of adverse effect	Timescale
Significant	None
More than minor	None
Minor or less / Nil	36 months

(a) **Relevant factors**

There is no dwelling on this property. The property is located on the high terrace top across the river from the northern end of the mining site, and approximately 60m higher than the site. Except from a steep portion of land on the terrace face, all views toward the site are screened by coniferous exotic trees. The land generally falls away from the terrace top.

(b) **Effects description**

No visual effects of any note.

33. **459 Luggate Tarras Road**

Degree of adverse effect	Timescale
Significant	None
More than minor	None
Minor or less / Nil	36 months

(a) **Relevant factors**

The dwelling is situated on a higher river terrace approximately 1.3km to the north of the site and has no visibility of the site due to screening by landform and vegetation.

(b) **Effects description**

No visual effects.

34. **26 Pukerangi Drive**

Degree of adverse effect	Timescale
Significant	None
More than minor	None
Minor or less / Nil	36 months

(a) **Relevant factors**

This dwelling is located on the terrace level above that of the site, to the west of State Highway 6. It is located approximately 380m distant and there is no visibility of the proposed mining area due to landform and vegetation screening.

(b) **Effects description**

No visual effects.

35. **71 Pukerangi Drive**

Degree of adverse effect	Timescale
Significant	None
More than minor	18 months
Minor or less / Nil	18 months

(a) **Relevant factors**

This dwelling is located on an older northeast facing terrace face some 50 – 60m higher than the site and approximately 470m distant from the proposed mining activity. It orientates along the slope to the north-east and has views over most of the site – the exception being an area screened by landform at the southern end.

(b) **Effects description**

There will be no visibility of the mining initially until the activity moves into view traversing through the central part of the site at viewing distances of over 470m. The mining will move progressively away from the viewpoint at the later stages, becoming less prominent as an element in the rural landscape on the river flat below as it does so. I consider that over approximately 900m distant, effects on landscape values will be minor.

36. **110 Pukerangi Drive**

Degree of adverse effect	Timescale
Significant	None
More than minor	None
Minor or less / Nil	12 months

(a) **Relevant factors**

This dwelling is located on an older terrace surface some 80m higher than the site. It appears to orientate mainly northward but would have views in an easterly and north-easterly direction toward the site. Due to screening by the terrace landform only approximately the northern third of the proposed mining site is visible at distances of over approximately 1.5km.

(b) **Effects description**

Mining activity and disturbance will not become visible until the final stage of the operation and will be seen as a relatively small component in the rural landscape mosaic on the river flats below.

37. **178 Fay Lane**

Degree of adverse effect	Timescale
Significant	None
More than minor	None
Minor or less / Nil	36 Months

(a) **Relevant factors**

This dwelling is located on an older eroded terrace surface some 180m higher than the site and approximately 2 km from the proposed mining. It appears to orientate mainly north-eastward but would have views in an easterly and north-easterly direction toward the site. It is difficult to discern from views back in this direction from the site as to whether there is any visibility of the mining area. If so, it would only be of he northern, more distant end of the site and at distances of approximately 2.9km or more.

(b) **Effects description**

If visible, only the last stage of the works will be seen at distances of over approximately 2.9km and more. The activity and associated disturbance to the landscape would be seen as a small part of the wider rural mosaic in the valley landscape below

38. **3204 Luggate Cromwell Road**

Degree of adverse effect	Timescale
Significant	None
More than minor	6 months
Minor or less / Nil	30 months

(a) **Relevant factors**

This dwelling is situated on a higher terrace on the same side of

the river as the site but to its south. It orientates northward and has views up the Upper Clutha Valley including much of the site. The proposed mining will be approximately 420m distant at its closest point.

(b) **Effects description**

Initially the mining will be screened by the terrace edge but will move into view approximately 700m distant and then progressively move away from this viewpoint. It will remain visible much of the time for the duration of the works, although there will be some screening by riverside trees particularly at the end stage. Degree of visual effect will largely be a function of viewing distance and I assess effects as minor over approx. 1km.

39. **83b Poison Creek Road**

Degree of adverse effect	Timescale
Significant	None
More than minor	None
Minor or less / Nil	36 months

(a) **Relevant factors**

This dwelling is located almost 3km to the south and has no visibility of the site due to landform screening

(b) **Effects description**

No visual effects.

Submitters properties / residences – Visual effects conclusion

40. It is acknowledged that there will be adverse visual effects experienced from some of the submitter's properties. The properties I consider most impacted are those in closest proximity and within which, the site forms

an important component of the overall outlook. These include 63, 67,79 and 85 River Ridge Road, 738 Luggate Tarras Road, 71 Pukerangi Drive, and 3204 Luggate Cromwell Road. More than minor adverse effects are assessed lasting between 6 and 24 months from these properties.

41. There will be minor adverse visual effects from 110 Pukerangi Drive and potentially, 178 Fay Lane and no visual effects from 54 River Ridge Road, the Kane property, 459 Luggate Tarras Road, 26 Pukerangi Drive and 83b Poison Creek Road.

Comment on the Peer Review report by Mr Milne

42. I consider that Mr Milne's review and my assessment are relatively well aligned regarding the nature and degree of the effects of the proposal on the natural character of the Clutha River / Mata-Au and on the landscape values of the receiving landscape. Mr Milne recommends a condition providing for half-yearly reviews of the rehabilitation to ensure its effectiveness and I agree that such a condition is appropriate.

Conclusion

43. The requested assessment of the effects on the views from submitters properties outlined in this evidence has provided greater detail and nuance to the visual assessments provided in my report but in my assessment, effects are no greater than moderate-high (more than minor) and of limited duration.

44. Overall, I conclude that:

    (a) Adverse effects on the natural character of the Clutha River / Mata-Au and its margins are avoided and that as noted in my RFI response dated 8 May, any adverse effects on Outstanding

Natural Feature (ONF) values associated with the river will be low.

(b) Adverse physical effects on the site landscape values will be moderate during mining operations and very low following final rehabilitation.

(c) Adverse visual effects on landscape values from public places surrounding will be no greater than moderate during mining operations and very low following final rehabilitation.

(d) Adverse visual effects on landscape values from submitters properties will be no greater than moderate-high during mining operations and very low following final rehabilitation.

45. I acknowledge that the nearest residents, especially across the river, will regard visible mining activity as a significantly adverse change to their current visual amenity, even on a relatively short-term basis. Whether the mitigation measures proposed and temporary nature of the proposed activity should be regarded as adequately avoiding, remedying or mitigating the adverse effects on the open space, landscape, natural character and amenity values of the rural environment[8] to a large extent depends on whether the Panel finds that the District Plan anticipates mining occurring in the Rural Resource Area. I regard that as a planning matter. My evidence is limited to assessing the adverse effects on naturalness and openness values associated with the current rural character of the site, acknowledging that the site is in a state of transition towards implementing the 8 lot rural lifestyle subdivision consent.

Dated 13 October 2026

M Moore

[8] Policy 4.4.2- Landscape and Amenity Values

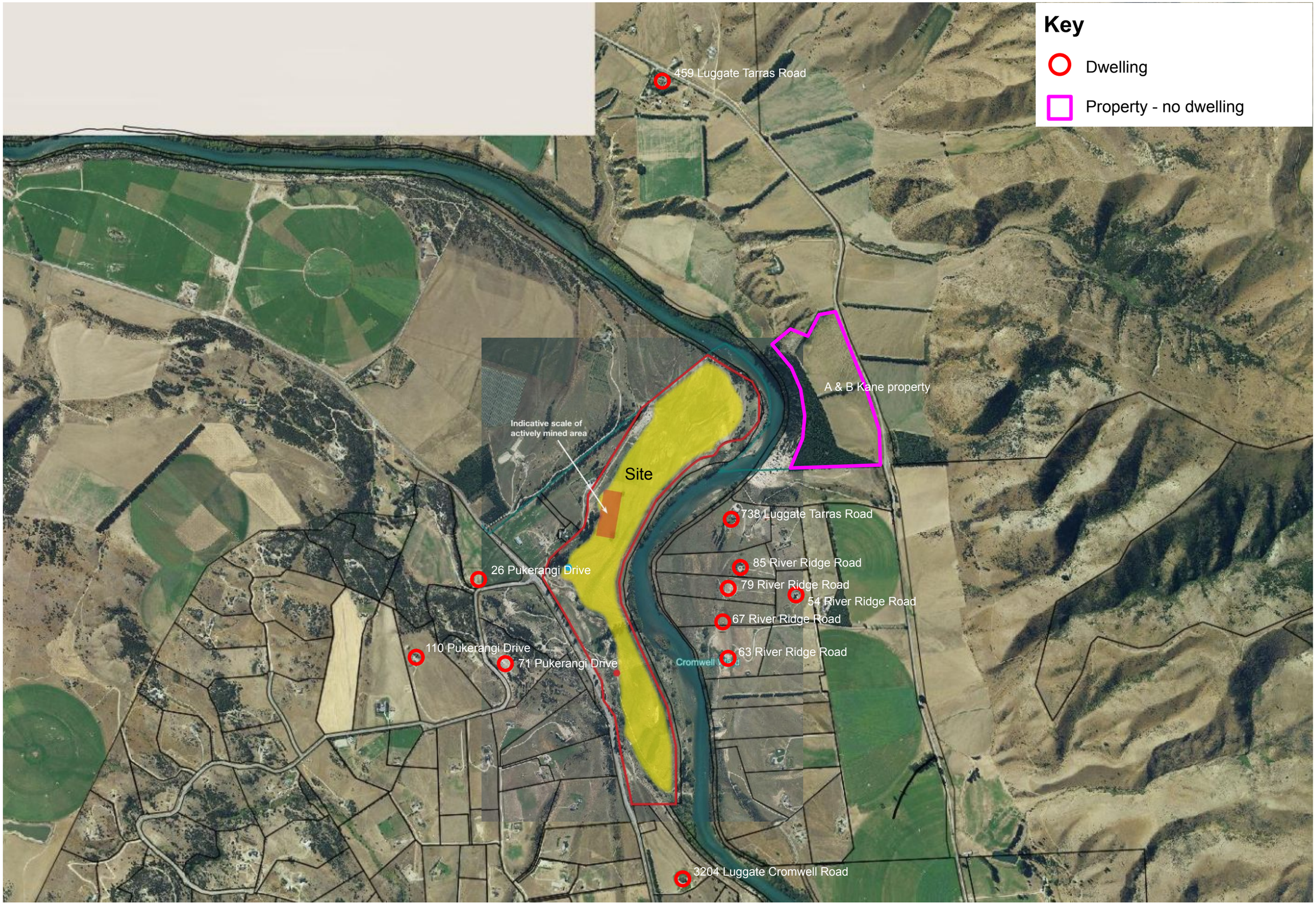


Figure 1A: Submitter's property / dwelling location map (north)

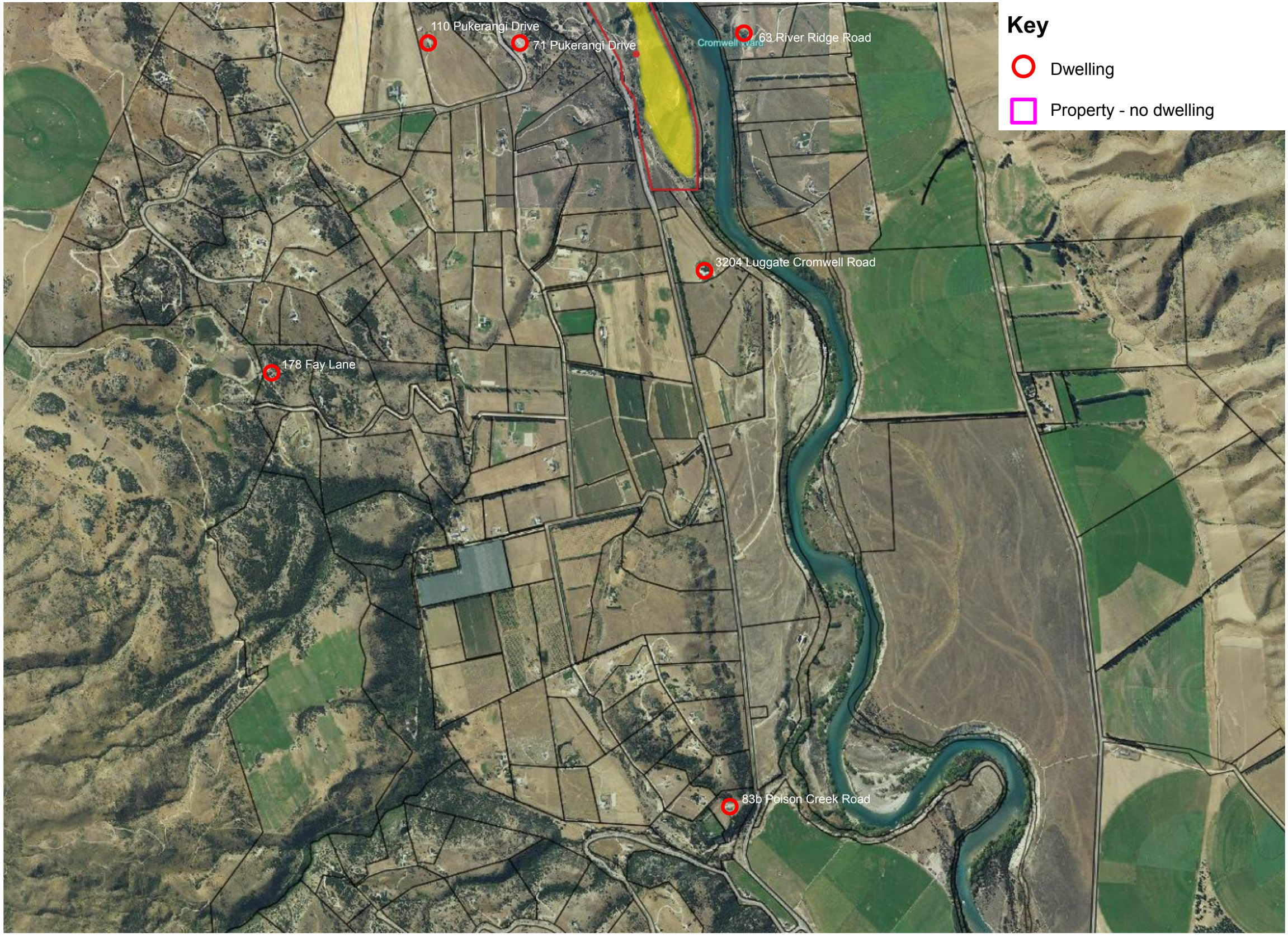


Figure 1B: Submitter's property / dwelling location map (south)