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Memorandum

To Darryl Sycamore
Terramark

From Mike Moore

Date 8 May 2026

Subject Proposed Alluvial Gold Mine, Luggate Cromwell Road, Sandy Point. Response to CODC RFI questions

This memorandum is in response to questions from the Central Otago District Council Peer Reviewer as forwarded to me by yourself. Below, I note the comment / request and provide a response.

1. *There is no assessment of cross boundary effects, and the Landscape Report doesn't acknowledge or discuss the following matters relating to QLDC pertaining to landscape elements and classification immediately adjacent to the site (acknowledging the site is in CODC territory):*
 - *There is no acknowledgement of QLDC classification of Mata-au / Clutha River as Outstanding Natural Feature (ONF) / 21.22.25 Mata-au / Clutha River PA.*
 - *There is no acknowledgement of QLDC classification of surrounding land immediately adjoining the Site to the north, or areas of Outstanding Natural Landscape surrounding the Site.*
 - *There is no acknowledgement of QLDC classification of Wāhi Tūpuna Mata-Au (Clutha River) Manawhenua Values: Ara tawhito, mahika kai, nohoaka Reference Number: 32. (although cultural values are mentioned in relation to being subject to Statutory Acknowledgement under the Ngāi Tahu Claims Settlement Act 1998)*
 - *There is no acknowledgement of QLDC classification of Threatened Environments Classification 2012 (Criteria: <10% indigenous cover left).*

Response

The site is on the CODC / QLDC boundary and the peer reviewers' point as to the relevance of cross boundary effects is acknowledged.

The Queenstown Lakes District Plan (QLDP) identifies the Mata-au / Clutha River and its margins as an ONF, and the hill country either side of the Upper Clutha Valley is identified as ONL. Beyond the river margins the valley flats are not covered by a landscape overlay. The QLDP has not included this area in its Priority Area Landscape Schedules (Section 21.23). The peer reviewer refers to QLDP section 21.22.25, I presume, in error.

In terms of its physical character, the application site, on the Central Otago District side of the border, relates to the Upper Clutha valley floor areas in Queenstown Lakes District that are not covered by ONF or ONL overlay. In the case of the Mata-au / Clutha River ONF, the QLDP mapping extends a small way across the boundary and confirms this.

Whilst the ONF status of the Mata-au / Clutha River varies to either side of the QLDC / CODC boundary it is my assessment that the river has values worthy of an ONF, acknowledging its Wāhi Tūpuna recognition and recognised ara tawhito, mahika kai, nohoaka values as part of this assessment.

In terms of the effects of the proposed mining on the river ONF, I consider that the site is within the wider river context and not within its margins. The proposed activity will have no direct effects on the ONF. As noted in the landscape effects assessment report (LEA), effects on the natural character of the river will be avoided.

When close to the river margin the proposed mining will have indirect adverse effects on perceptual and associative values related to qualities of naturalness and tranquillity which may also impact cultural landscape values. I assess these as adverse / low (minor) given the modified rural context, the fact that no indigenous trees or shrubland will be impacted, the temporary nature of the effect, and the variable proximity of the mining.

As regards effects on the identified QLDC ONL's on the higher, more natural land to either side of the Upper Clutha Valley, the effects of the proposed activity will be seen in the

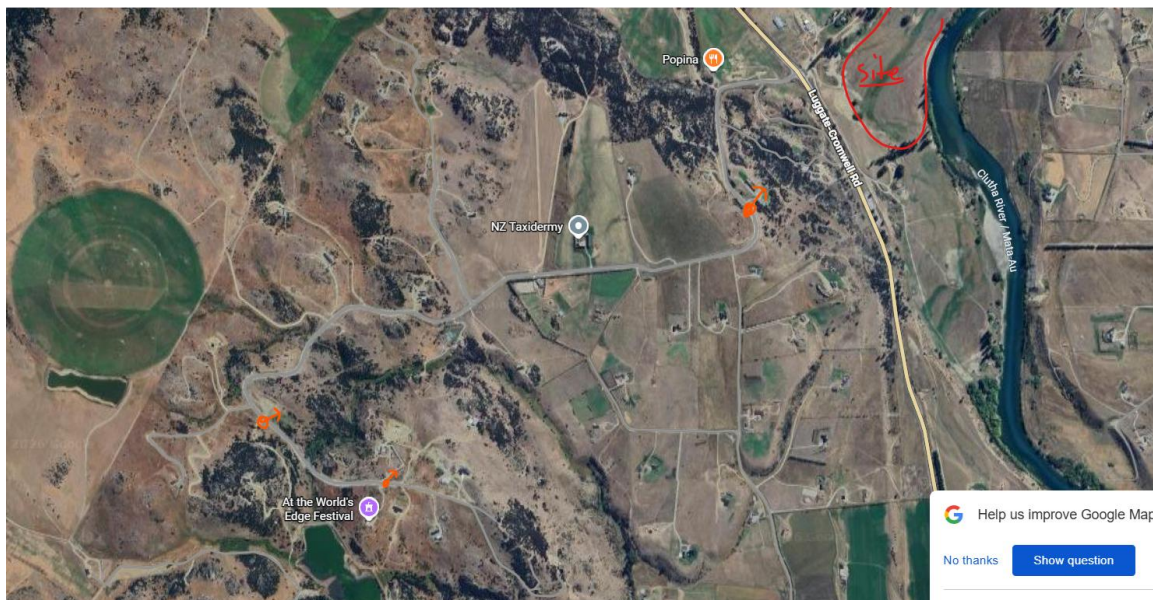
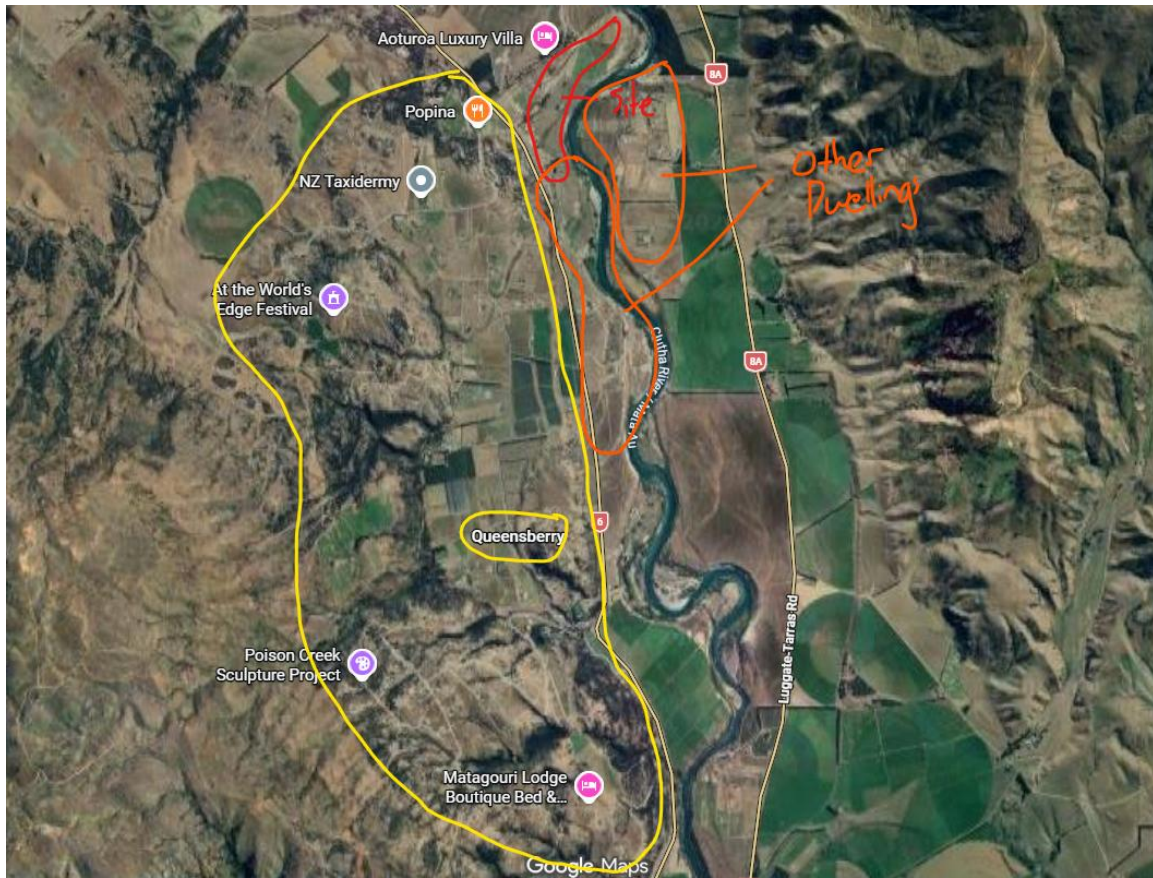
context of the more modified valley floor (within both QLDC and CODC areas). I assess effects on the values of these hill slope / mountain range ONL areas as nil.

Regarding the 'threatened environments' classification. The site and land within the Upper Clutha Valley downstream of the QLDC boundary more generally, is similarly covered by this classification. The site is modified farmland and will be returned to pasture. No indigenous shrub or tree species will be impacted by the proposed works. The proposed activity will have no impact on the 'threatened environments' status of land within the QLDC area.

2. *There is no discussion in regard to the effects on visual amenity of surrounding north-west orientated dwellings located within Queensbury and Māori Point. Please provide an assessment of the effects on visual amenity of these private views.*

Response

I understand that the dwellings in question are within the areas circled in the maps below, forwarded by CODC.



As noted in the LEA report the visual effects of the proposed activity from the many private dwellings in the area surrounding are assessed on the basis of representative public

viewpoints. Visual effects from two viewpoints on Pukerangi Drive are assessed and as noted, these are generally representative of effects from private properties on the slopes overlooking the site to the west (i.e. the area shown in the bottom image above).

Effects from the area marked (top image) to the east of the river (true left) are addressed in the LEA on page 16. There are no publicly accessible viewpoints in this area but as noted, assessment has been made on the basis of views back toward these dwellings from the site.

The more distant areas to the south of the site highlighted in the top image have not been specifically assessed but effects would either be screened by landform, minimised by distance and / or similar in character to those assessed from Pukerangi Drive (i.e. relatively distant viewpoints at a higher level overlooking the river flats).

3. *Mr Milne considers it is erroneous to use the short 3-year term of proposal as mitigating the effects arising – as the LAR does. Please provide explanation/justification on why this has been done and how this approach aligns with accepted best-practice landscape assessment methodology.*

Response

The LEA clearly distinguishes between the nature and magnitude of effects whilst the mining is operational, and the nature and magnitude of legacy effects. It acknowledges the variability of effects associated with a roving activity at any one place. I consider this is appropriate. I consider the duration of effect to be a relevant factor in determining magnitude. I am unaware of any best practice guidance in Te Tangi a te Manu¹ that would be contrary to the assessment method adopted.

4. *While it is acknowledged that a Rehabilitation Plan will be provided as a condition of consent, some further detail at this stage needs to be provided so an accurate assessment of effects*

¹ Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

can be undertaken. Please provide further details regarding the location / height of tailing stockpiles / bunds.

Response

There will be no permanent bunds. Temporary topsoil and overburden stockpiles and temporary tailings heaps will be associated with the active mining area as it moves around the site. As illustrated in Figure 8 in the LEA, the total footprint of these areas is as follows:

- Topsoil and overburden stockpiles – 50m x 10m
- Tailings heaps – 15m x 50m

The maximum heights of these stockpiles and tailings will be:

- Topsoil and overburden stockpiles – 1.5m
- Tailings heaps – 1.5m



Mike Moore

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