

**BEFORE THE EXPERT PANEL**

**FTAA-2507-1089**

**UNDER  
IN THE MATTER**

Fast-track Approvals Act 2024  
of the Bendigo-Ophir Gold Project

---

**STATEMENT OF JONATHAN KENNETT ON BEHALF OF SUSTAINABLE  
TARRAS**

**Dated 20 August 2026**

---

---

**Julian Miles KC**  
Richmond Chambers  
miles@richmondchambers.co.nz

**SALLY GEPP KC**

M +64 21 558 241 — SALLY.GEPP@MILLSLANE.CO.NZ  
MILLS LANE CHAMBERS, 3 BROOKSIDE, NELSON 7010  
PO.BOX 537 SHORTLAND ST, AUCKLAND 1140. MILLSLANE.CO.NZ

## TO THE EXPERT PANEL

1. My name is Jonathan Kennett. I provided a statement on behalf of Sustainable Tarras Inc in relation to cycling recreation as relevant to Matakanui Gold Limited's (**MGL**) application dated 29 March 2026. My qualifications and experience were set out in that statement.
2. The purpose of this statement is to respond to MGL's new information in response to RFI 9 – Traffic/Roads and Recreation.
3. The information provided by MGL clearly shows that the Ardgour Rise design is significantly different from the existing Thomson Gorge Road. Ardgour Rise is certainly not a like-for-like replacement. The main differences were outlined in the Recreation Joint Witness Statement dated 27 May 2026 and are not adequately addressed by the design modification. Their key differences between the two options are outlined below.
4. The majority of Thomson Gorge Road is in a sheltered valley (Rise and Shine Creek), whereas the majority of Ardgour Rise is on an exposed ridge.
5. Thomson Gorge Road climbs up to 980 metres altitude, and is only above 900 metres for 2.7 km. Ardgour Rise on the other hand climbs to 1040 metres altitude and is above 900 metres for 6 km. The additional altitude and exposure results in greater levels of erosion from direct wind, rain, and freeze-thaw.
6. The most significant difference is that the gradients on the proposed Ardgour Rise route, even after bulldozing off the high points and filling in the low points, are significantly steeper than on Thomson Gorge Road. The steeper gradients are not only more difficult for people to drive up and cycle up, they are much less sustainable, meaning they will be prone to greater erosion, which will result in a rough, rocky and rutted surface. This results in reduced recreational use over time.
7. The table under paragraph 9 of the Memorandum from David Stretch (on behalf of MGL) compares the revised gradients of Ardgour Rise with Thomson Gorge Road. Under the Australian Road Research Board (ARRB) Unsealed Road Guidelines, the maximum sustainable gradient is 12.5%. Short sections over 12.5% are permissible, although not desirable. The revised design for Ardgour Rise has 4,880 metres over the recommended 12.5% and some of the sections over 12.5% are a kilometre long.
8. This compares with only 1,390 metres over 12.5% on Thomson Gorge Road, where the steep sections are broken up into short lengths, which reduces the cumulative water scour impact on the road.
9. Furthermore, with such long steep sections on the elevated and exposed ridge of Ardgour Rise, the small particles on the unsealed road, which bind together the larger aggregate material, will be blown and washed away. The road surface will break apart and deteriorate making it harder to use and less safe.
10. The new information notes that "proposed gradients up to 20% are confirmed as being acceptable in the Myer Cruden Report on the November 2025 Alignment. I consider that the Myer Cruden Report cherry-picks data by only focusing on the 16.7% to 20% gradients, and largely ignoring the 12.5% to 16.7% gradients. Their table of gradient comparisons, however, makes it

clear that Ardgour Rise is steeper for much longer than Thomson Gorge Road.

11. For recreational/tourist cyclists, the difference between Thomson Gorge Road and the proposed Ardgour Rise is significant. Not only is the Ardgour Rise route 5.4km longer, but it also has more climbing, and the climbing is more relentless. This is because in efforts to reduce the steepest sections on Ardgour Rise, the less steep sections have had to be eliminated (filled in). The result is that the Ardgour Rise climb has very few places for cyclists to recover, and conversely, very few places for descending water to slow down.
12. In summary, the two roads are not like-for-like. They are quite different. The proposed Ardgour Rise route would not be an improvement to the existing road. The new road would be longer, steeper, higher, rougher, less safe and less sustainable.

19 August 2026

Jonathan Kennett