

**Before the Expert Panel appointed  
under the Fast-track Approvals Act 2024**

**Under** the Fast-track Approvals Act 2024  
**(Act)**

**And**

**In the Matter of** an application for approvals by  
Matakanui Gold Limited to establish,  
operate, rehabilitate and ultimately  
close an open pit and underground  
gold mining operation known as the  
Bendigo-Ophir Gold Project

**Statement of Evidence of  
Robert Greenaway on behalf of  
Matakanui Gold Limited in response to  
Section 53 Feedback  
Recreation**

Dated: 17 April 2026

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**lane neave.**

## INTRODUCTION

1. My name is Robert James Greenaway.
2. I have almost 40 years' experience in the recreation field, the past 30 as a self-employed recreation and tourism research and planning consultant specialising in impact assessments for large-scale infrastructure projects. I have completed more than 500 projects nationally and presented evidence at more than 120 hearings. I am an Accredited Recreation Professional with Recreation Aotearoa, and am on that professional association's accreditation board. I graduated from Lincoln University in 1987 with a three-year Diploma in Parks and Recreation Management with Distinction and completed 18 months of postgraduate study in conservation management.
3. This statement is given as part of Matakanui Gold Limited's (**MGL**) response to comments on the BOGP made under Section 53 of the FTA. This statement responds to specific comments raised by the:
  - (a) Otago Conservation Board;
  - (b) The Abley Traffic and Transport Assessment for the CODC (as it relates to recreation access to the Come in Time (**CIT**) Battery);
  - (c) Sustainable Tarras Incorporated Society, specifically the comments of Jonathan Kennett; and
  - (d) Department of Conservation (**DOC**).
4. My original findings are provided in full in the June 2025 report B.39 Rob Greenaway & Associates – Recreation Assessment (Greenaway, 2025).
5. I also provide in this evidence an update to the traffic counter data to which I refer in my technical report (section 5.1). At the time of preparing my report, the traffic counter on Thomson Gorge Road installed for MGL was malfunctioning. Unfortunately, the equipment has experienced ongoing issues, for example, the unit's solar panel blowing off, issues with data downloads, and unusual data patterns generally. However, I have extracted some limited data which indicate the levels of use of the road.
6. I have prepared this statement in the limited time available for MGL to respond to comments under the Act.

If the Panel requires elaboration on any of the matters raised in this statement, I am available to provide further information on request.

7. Although this is not an Environment Court proceeding my confirmation of compliance with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 is included in Substantive Application Document A0.2B.

## **TRAFFIC COUNTER UPDATE**

8. As I have mentioned, extracting data from the traffic counter installed near the summit of Thomson Gorge Road has proven difficult. This is partly due to its exposed location, which was chosen due to the better cellular reception there. The technology, which aims to differentiate cyclists, walkers and vehicles, has not performed well. The service providers have extracted a short period of data over the 2024/25 Christmas period which appears to offer some indication of likely use levels. The data were originally differentiated by pedestrians, cyclists and vehicles, but the pedestrian data appears unlikely to be accurate, considering some very high counts recorded and a real lack of walking options in this setting – due to its remoteness, not being a walking track, and having zero records for pedestrian activities on Strava (and lots of records for cycling – see section 5.2 of my technical report).
9. Figure 1 in Appendix A to this evidence shows counts for cyclists and vehicles from 29 November 2024 to 11 February 2025 (76 days). This is likely a high-use period considering the Christmas holidays and Waitangi Day. The weekend mean count for cyclists was 9.6 per day, and 5.6 per day during the week. For vehicles, the mean weekend count was 12.5 per day, and 7.5 during the week.
10. Figure 2 in Appendix A shows the hourly profile for activity for both cyclists and motorists, which are very similar. The profile is quite predictable, with a midday peak, and suggests some reliability with the data.
11. These data do not change the findings of my technical assessment, but provide additional support.

## SPECIFIC RESPONSE TO COMMENTS

### Otago Conservation Board and Abley Traffic and Transport Assessment

12. The Otago Conservation Board states at its paragraph 2f: “*The proposed changes to public access would make it substantially more difficult for recreational users to access sites of interest, including those valued for their historic significance.*”
13. I assume this relates to public access to the CIT Battery, as the Otago Conservation Board does not provide specific detail. This concern is canvassed in more detail in the DOC’s s51 Concession Report. In that report DOC states that it prefers an alternative alignment to the applicant’s proposed walking route access to the CIT Battery, which is via the Bendigo Historic Reserve (DOC’s Table 9). I agree with the DOCs assessment of the relative difficulties posed by the proposed route compared with the status quo. Given that retaining the status quo is not a feasible option alongside the proposal, I consider the currently proposed route will ensure that some form of access continues to be provided. DOC suggests that it has a preferred route in mind (Table 5) which might be preferable, and I understand that MGL has begun communicating with the Department about this, with discussions imminent. This is also reflected in the planning statement of evidence prepared by Mark Chrisp in response to comments.
14. The Abley Traffic and Transport Assessment for the CODC (Appendix D) recommends that the walking track to the CIT Battery as proposed in the Substantive Application should be developed to “*easy to intermediate walking track standard*” to match the existing track standard from Thomson Gorge Road to the CIT Battery (section 4.5). I agree that this might be preferable at face value, but it is not necessarily the best solution for the landscape, heritage or ecological setting. The route as proposed has a light footprint, but will not be a like-for-like experience. Further discussions with DOC will, I expect, resolve a preferred option.
15. I note that in Dr Naomi Wood’s Panel RFI response (paragraph 51) and her S53 response (paragraph 101) she opines that MGL’s proposed route will take visitors through a more recognisable heritage landscape and will better emphasise the interconnected nature of the Bendigo mining landscape than the current access.

## **Sustainable Tarras**

### ***Jonathan Kennett***

16. Mr Kennett has reviewed the value of Thomson Gorge Road for recreational cycling, and I am in general agreement with his assessment as it relates to the importance of Thomson Gorge Road for recreational cycling and the need to maintain a suitable standard of access for cyclists. While he misreads the section of my technical report relating to the standard of the existing farm road on Ardgour Rise (I did not include the gradient analysis to suggest that the replacement route will have that gradient), I agree where he recommends in his final paragraphs that consent conditions should include that the Ardgour Rise alternative route is:
- (a) open prior to further mining activity on Thomsons Gorge Road, to reduce the risk of users and construction traffic interface, and
  - (b) redesigned using the cycle trail design guidelines (for Grade 4, Advanced) and approved in detail after consultation with user groups.
17. In my report I recommend that the road standard must meet the CODC's expectations to provide an access standard comparable to what exists currently (there is no currently agreed design for the Ardgour Rise to 're-design'), and, accordingly, agree with Mr Kennett's recommendation.
18. DOC in its s51 Concession Report notes that there is no alternatives assessment for the proposed Ardgour Rise, but (Table 5) "Given the proposed mine location, land contours, PCL locations and existing farm track easement, DOC accepts that the road facility cannot be reasonably undertaken in another location."

## **Department of Conservation**

19. DOC's comments in relation to recreation include:
- (a) that the proposed replacement access to the CIT Battery is inadequate (paragraph 6.30);
  - (b) that the removal of the Bendigo Conservation Covenant will result in the loss of public access to Mt Moka and the Bendigo Conservation Area (paragraph 6.33); and
  - (c) mining activity will remove public access to the Rise and Shine heritage sites as provided for in the conservation covenant (paragraph 6.33).

20. I have discussed the CIT Battery access issue above, as raised by the Otago Conservation Board, and expect to see a resolution via MGL's discussions with DOC.
21. I understand that consent conditions will retain public access to Mt Moka and the Bendigo Conservation Area, and there will be no effects on recreation in these locations for the mine life and afterwards.
22. Access to the Rise and Shine heritage sites will be lost due to mining operations associated with the BOGP. I did not identify recreational use of these sites during the research for my report, and they were not referenced in interviews or the visitor information data sources I referred to, or other comments made by parties through the Section 53 comment process. While the loss of these heritage assets will be a loss for recreation opportunities, in my opinion the impact will primarily be to heritage specialists rather than for the wider general recreation or tourism communities.



**Rob Greenaway**

**17 April 2026**

## APPENDIX A: TRAFFIC COUNTER DATA

Figure 1: Thomson Gorge Road counts for cyclists and vehicles, 29 Nov 2024 to 11 Feb 2025

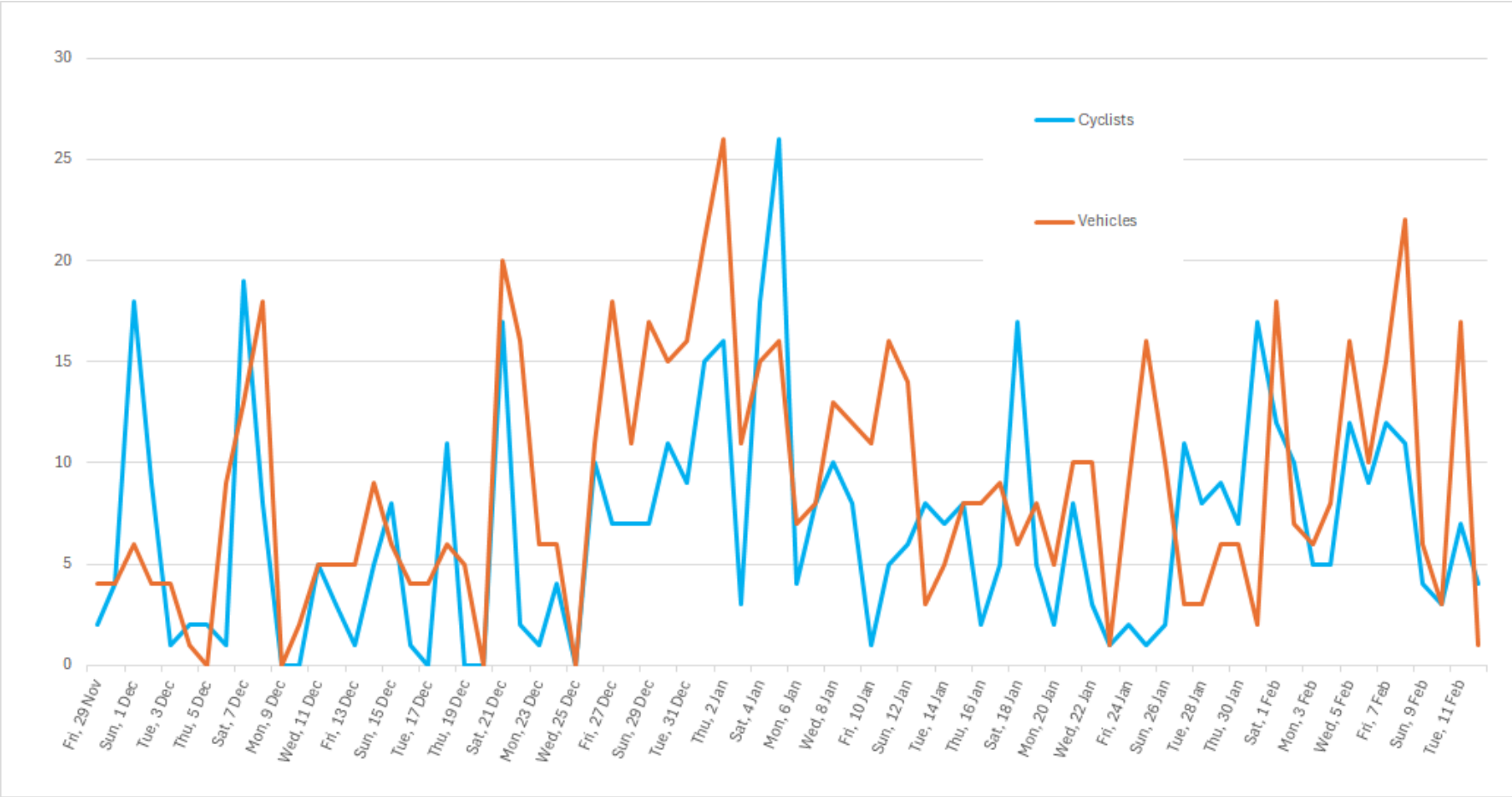


Figure 2: Thomson Gorge Road hourly profile for cyclists and vehicles, 29 Nov 2024 to 11 Feb 2025 (total count over period)

