

BEFORE THE EXPERT PANEL

FTAA-2507-1089

**UNDER
IN THE MATTER**

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

STATEMENT OF MATT SOLE ON BEHALF OF SUSTAINABLE TARRAS

Dated 20 August 2026

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TO THE EXPERT PANEL

1. My name is Matt Sole. I provided a statement on behalf of Sustainable Tarras Inc in relation to heritage as relevant to Matakanaui Gold Limited's (MGL) application in 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 10 – Heritage.

Question 1

Please address paragraph 53¹ in respect of any sites that have not been found or are not assessed in the B32 Heritage Assessment that may be affected by the proposal and are not included in the AHMP. What are the consequences if these sites are not covered by the Archaeological Authority?

NZHP's response

- 9 sites found by Matt Sole
- 4 of 9 relate to sites identified by NZHP
- presence of these sites does not change the outcomes of the values or impact assessments
- the AHMP will be updated to include the new sites
- any further unrecorded sites protocol outlines in B34.B para 2
- Authority conditions will be updated to include new site numbers

My response

3. NZHP's assessment of these newly found sites undervalues each due to a narrow, compartmentalised archaeological assessment rather than a place-based heritage impact assessment.
4. In relation to the comment that information was not made available, a 'report letter Area 6 Ardgor survey findings 31 August 2022'² was made to Santana Kim Bunting and to Megan Lawrence of NZHP containing location plans and xls tables with waypoints and comments with survey images in a separate file. That report identified two pack tracks, survey pegs, prospect pit and modifying side cast effects to the historic carriageway. No action appears to have been taken in relation to the new site recordings.
5. Recent survey work suggests the existing site recording may be incomplete, especially because new findings were identified only on publicly accessible land. This represents only a small subset of the wider project area.

¹ Chris Jennings CODC considers that, in addition to sites included in Section 7 of the AHMP, there are sites (including those affected by blasting) that were not found and/or not assessed in the B32 Heritage Assessment. Some may be affected by developments. Newly recorded sites by Matt Sole should also be considered. These should be assessed if they are to be included in the Archaeological and Heritage Management Plan. Emma Clifford Heritage NZ agrees with this.

² Report letter Area 6 Ardgor survey findings 31 August 2022

6. Bendigo is not treated as an interconnected heritage landscape, despite layered mana whenua, pastoral, mining, transport, settlement, and past significant assessment, including tenure review and national recognition of conservation values through heritage reserve, conservation covenant and HNZ listing. These heritage values occur across multiple archaeological layers, including:
- mana whenua travel, food gathering, and occupation;
 - early exploration, including survey trig points and survey plans;
 - early pastoral activity, including stone yards, run-boundary fences, boundary-rider routes, and mustering huts;
 - early settlement at Wakefield and Bendigo Creek, including Goodall's Hotel, O'Donnell's Store, and butchery;
 - mining activity, including alluvial mining, hard-rock mining, and dredging; and
 - transport routes, including travel routes, pack tracks, wagon tracks, tramways, and early carriageways or roads.
7. I disagree with NZHP's assessment that site G41/805 has low "rarity or uniqueness" values. The assessment against the wider Otago goldfields context is incomplete. G41/805, as a hard-rock prospecting trench, lies directly opposite the G41/277 complex, which includes three batteries, associated mining shafts, tunnels and trench cuts, alluvial workings, water races, a tramline, and a wagon track. In that context, G41/805 contributes to the evidence of hard-rock and alluvial mining operations at this place. It has moderate rarity or uniqueness value and is clearly linked to the wider complex.
8. I disagree with the summary of archaeological value for site G41/796, the pack track. This pack-track remnant forms part of a significant route rising out of Thomson Creek toward Thomson Saddle, then descending from the saddle via Battery Hill ridge and sidling down into and along Rise and Shine Valley. It is both a physical and visual component of the heritage landscape. It aligns and contributes significantly to the rich transport archaeology of this place, including mana whenua routes and trails, early exploration routes, early settlement routes, pastoral and mining tracks, wagon tracks, and early carriageway-road development. It is also descriptively referenced in Papers Past and other sections are very likely to remain.

Question 2

Please provide a heritage assessment of the proposed new public access route, and any other alternative routes being explored, to the Come-in Time battery, in terms of the extent to which they maintain or enhance its heritage values and visitor experience. The Panel notes that this issue is also the subject of question 2 in its RFI dated 28 May 2026³ and the Panel recommends that the Applicant coordinates the response to this question with that RFI.

³ About the interactions with recreation? "2. Please set out the mechanism by which public access to the Bendigo Conservation Area is to be maintained."

NZHP's response:

- Assessment of the original route to CIT battery is included in B.38. Can be installed without modification of heritage sites.
- No assessment done of alternatives, however alternatives must be submitted to DOC for certification, informed by heritage experts.

My response:

9. Public access proposals may affect heritage values and as noted are not like for like with current access, and alternative more like for like access routes appear not to have been properly assessed.

Question 3

Please provide an updated assessment of the Matakanui-Bendigo Road which includes the features identified by Mr Sole in his evidence and any other features that are not included in the original assessment.

NZHP response:

- Holds low levels of heritage value

My response:

10. This is an as-built, isolated road fragment to "nowhere": it was never completed and has some similarity to the Bridge to Nowhere, Heritage New Zealand listing #7168. It is a unique, unfinished section of road that remains publicly accessible and is close to its original state. Its associated survey plan and survey pegs add to the associated Bendigo heritage transport landscape, which includes mana whenua travel routes, early pack tracks, wagon tracks, and routes associated with early pastoral activity, exploration, settlement, and mining. The route is classed as road reserve, is publicly accessible, and has marked public access. Public recreation and education guidance is also available via <https://foolsgold.nz/map/>.

Question 4

Please set out how the Applicant intends to address whether there are potential risks of blasting and vibration on heritage items that are not included in the Archaeological Authority Application before the Panel. In particular, if the heritage items are not included in the Archaeological Authority Application, is the Panel able to grant consent to blasting and vibration that would have adverse effects on those items, or would the Applicant need to obtain a separate Authority before any blasting or vibration occurs?

NZHP's response:

- Any necessary mitigation will be taken to protect sites outside the DDF

- For blasting noise and vibration a management plan will be needed
- Protection of these sites already has a process therefore are not needed under the AA
- Temporary shoring seg sandbagging will be installed around sites within 500m of the closest pit edge = continued protection so no AA needed

My response:

11. Relies on mitigation to ensure no adverse effects – this is something that the Panel should be assessing not leaving to a future process. Based on experience with blasting and vibration near heritage places, an HNKP-approved archaeologist should be onsite during the development of pre-blasting dilapidation surveys, to confirm and record baseline conditions for all relevant sites.
12. This should be followed by occasional monitoring, undertaken in consultation with DOC, for this matter and the matters identified above.

Question 5

Can the Applicant confirm whether a separate Archaeological Authority is required for the proposed Bendigo Creek Willow Control works covered in the Conservation Act Covenant? The Panel encourages the applicant to liaise with NZHPT to confirm a response to this item.

NZHP's response:

- Will aim to avoid modification of heritage sites
- Assessment is incomplete due to vegetation
- Heritage expert will be involved if trees need to be felled near heritage sites
- If modification is needed an AA will be applied for
- Has liaised with HNKP

My response:

13. Willows can be difficult to manage and control because of whipping and unpredictable hinge behaviour, making directional felling unreliable. Based on previous DOC track-maintenance windfall-clearance experience, a more acceptable and precautionary approach would be to obtain an archaeological authority, with input from and direct supervision by a DOC heritage expert and a qualified arborist experienced with willows.
14. Machine assistance is likely to be required to avoid limbs or branches falling onto fragile historic structure walls and retaining structures beneath the willow canopies. Consideration should also be given to lifting and moving limbs and slash to suitable debris-disposal areas away from heritage features, regrowth areas, and waterways. Given the absence of detailed update survey associated with a known settlement of miners huts with likely surface domestic artefacts etc and there significance in servicing the nearby mining complexes of the Come In Time, Eureka and Alta, combined with the high

damage risks with willow felling and clearing, an archaeological authority should be obtained.

Question 6

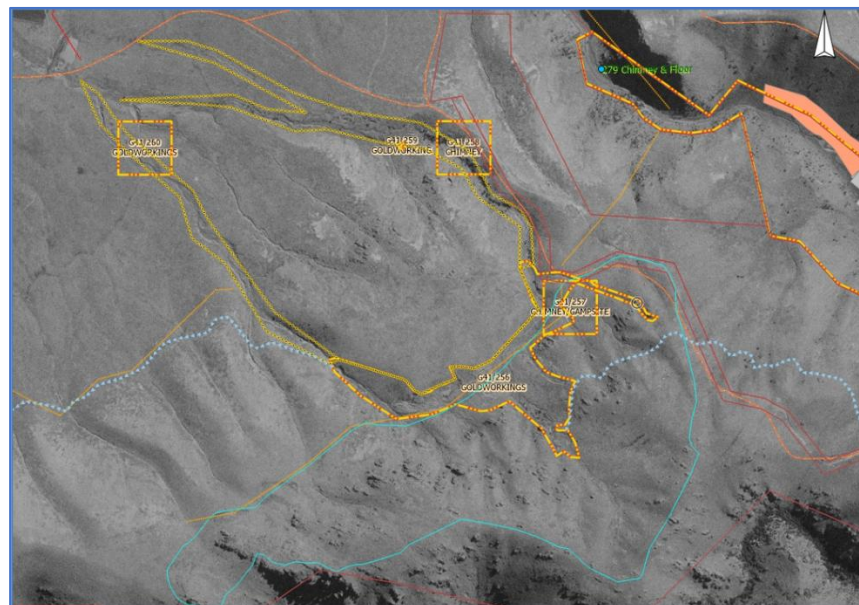
Please provide an assessment of the Bendigo Sanctuary Area and the potential effects on heritage items arising from the proposed works.

NZHP's response:

- Two sites within the Bendigo Sanctuary
- However fence installation doesn't increase impact to site, site complex or broader area
- The inclusion of the fences in the existing Authority Application is therefore appropriate as the additional works do not change the AEE.
- The map attached to the AA conditions will be updated to reflect this.

My response:

15. The predator-proof fence line dissects the recorded earlier Kohinoor Syndicate alluvial mining workings. If the BOGP is consented, these workings will be the only intact alluvial gold workings remaining in the Rise and Shine and Shepherds Creek area.
16. My assessment indicates that the current site record G41/256 is incomplete. It should be enlarged to incorporate the connecting water race and the downstream alluvial gully workings below G41/256, including recorded chimney hut site G41/258 and gold workings G41/259 and G41/260, as shown in the diagram below.



Bendigo Sanctuary site shown dissecting the current Kohinoor alluvial workings polygon G41/256 and proposed extension to incorporate the full extent of alluvial workings and water races — Kopuwai Archaeology.

17. By way of comparison, the Moko Moko Skink and Gecko Sanctuary above Alexandra required a predator fence and planting within historic gold workings in the Aldinga Conservation Area, Conroy's Gully. An archaeological assessment determined that, to manage impacts on gold-mining fabric and sites from predator-fence earthworks and planting earthworks, an archaeological authority was required. The authority number was 2014/872. From experience the HNZIP misrepresents the earth work effects of the predator fence installation and the physical dissection of the heritage site and visually truncate and intrude on both the heritage landscape and the outstanding natural landscape. The HNZIP assessment fails to consider and acknowledge earthworks associated with sanctuary offset planting and skink relocation.

20 August 2026

Matt Sole