

Internal Assessment for Bendigo Ophir Gold Project [FTAA-2507-1089]

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Application Details

HNZPT Reference	2026-581	
Authority Type	General	
Applicant details		
Applicant/s	Matakanui Gold Limited (a wholly owned subsidiary of Santana Minerals Limited)	
Site Location	Bendigo and Ardgour Stations, approximately 20 kilometres north of Cromwell, Central Otago.	
Legal description	Section 11 SO 24641 Section 12 SO 24641 Section 14 SO 24641 Section 15 SO 24641 Section 16 SO 24641 Section 18 SO 24641 Lot 4 DP 525495 Lot 5 DP 517385 Lot 6 DP 517385 Part Lot 10 DP 391334 Lot 2 DP 316124 Lot 1 DP 525588 Lot 11 DP 525588 Lot 2 DP 505064 Lot 1 DP 505064 Lot 1 DP 509332 Lot 5 DP 548903	Section 10 SO 554095 Lot 14 DP 548903 Section 1 Block IX Lauder SD RUN 238N Section 3 SO 435480 Section 1 SO 401685 Section 1 SO 24604 Section 1 SO 300797 Section 3 SO 300797 Section 4 SO 300797 Section 5 SO 300797 Lot 17 DP 548903 Section 21 SO 554095 Section 22 SO 554095 Section 5 SO 554095 Road reserves
Land-owner consent	NO	

Substantive Application documents reviewed in preparation of this internal assessment

- A.02B - Legal Overview
- A.05 - Acronyms and Glossary
- A.08 - Section 1 Introduction

- A.09A - Section 2 Existing Environment
- A.10 - Section 3 Project Description
- A.12 - Section 5 Consultation
- A.13 - Section 6 Assessment of Effects
- A.14- Section 7 Management and Monitoring of Actual and Potential Environmental Effects
- A.15 - Section 8 Fast Track Approvals Act 2024 Requirements
- B.34A - *New Zealand Heritage Properties Ltd- Heritage Assessment (NZHP 2025a) (10 March 2026)*
- B.34B - *New Zealand Heritage Properties Ltd- Heritage Assessment (NZHP 2025a) (10 March 2026)*
- B.35 - *New Zealand Heritage Properties Limited- Magazine and Emulsion Take Memorandum (NZHP 2025b)*
- B.36 - *New Zealand Heritage Properties Limited – Construction Camp Heritage Assessment (NZHP 2025c)*
- B.37 - *New Zealand Heritage Properties Limited - Ardgour Rise Realignment Memorandum (NZHP 2025d)*
- B.38 - *New Zealand Heritage Properties Limited - Come in Time Track Memorandum (NZHP 2025e)*
- C.03 - *BOGP Consent Area (10 March 2026)*
- C.22 - *Ardgour Rise and Chorus Fibre Cable Alignment (10 March 2026)*
- C.24- *Proposed Concession Overview (10 March 2026)*
- D.05- *Archaeological Authority Conditions- Clean (10 March 2026)*
- D.05- *Archaeological Authority Conditions- Track Changes (10 March 2026)*
- B.39 - *Rob Greenaway & Associates Recreation Assessment (Greenway 2025)*
- G.15 - *Engineered Landform Management Plan*
- G.16 - *Tailings Management Plan*
- G.19 - *Noise and Management Plan*
- G.22 - *Archaeological and Heritage Management Plan*
- J.01- *Land Use Consent Application for Activities on Ardgour Terrace*
- J.02 – *Land Use Consent Application for Construction of Ardgour Rise*
- K.06 – *Marshall Day Acoustics- BOGP Blasting Vibration Effects on Heritage Structures (10 March 2026)*
- K.07 – *New Zealand Heritage Properties Limited- CV for Dr Naomi Woods (10 March 2026)*

Proposed Activity

Matakanui Gold Limited (the Applicant) propose the establishment of a new gold mining operation called the Bendigo-Ophir Gold Project (the Project) within the Bendigo and Ardgour Stations in the Dunstan Mountains, 20km north of Cromwell, Central Otago. The summary below draws on information set out in *A.10 - Section 3 Project Description* of the substantive application.

The Project involves mining four gold deposits Rise and Shine (RAS), Come in Time (CIT), Srex (SRX) and Srex East (SRE) through open pit methods at each of the gold deposits as well as underground mining at RAS to access deeper gold deposits.

The Applicant has separated the activities associated with the application into two areas, the 'Project Site' and the 'Consent Area'. The same separation has been included in this discussion of the proposed activity.

The authority applied for under the FTAA 2024 (the **authority application area**), is primarily for the area within the Project Site but excludes the pipeline and boreholes on the Bendigo Terrace and includes an area of exploratory drilling in the northwest of the Consent Area (see Figure 1 appended to *D.05- Archaeological Authority Conditions- Clean (10 March 2026)*).

Project Site: Forms the areas of proposed mining activities as well as the ancillary facilities and associated infrastructure (see Figure 1). These are primarily located within the Shepherds and Rise and Shine Valleys however, additional supporting infrastructure is located on the adjoining Bendigo and Ardgour Terraces and includes:

- Two bore holes on the Bendigo Terrace and associated pipelines for supply of fresh water.
- Upgrade to the intersection of SH8 and Ardgour Road.
- Construction of Ardgour Rise- a new road to maintain public access between Ardgour Terrace and Thomsons Saddle

The Project Site is primarily within the privately owned Bendigo and Ardgour Stations. Current land use within the Project Site is primarily extensive pastoral grazing of beef, cattle and merino sheep. Thomson Gorge Road is a four-wheel drive track and provides access to the Manuherikira Valley in the east and lower Lindus in the west. This road will be upgraded and realigned to form Ardgour Rise. Thomson Gorge Road, the undeveloped paper road which runs through the lower Shepherds Valley and part of Matilda Rise and Bendigo Loop Road which contains the proposed bore field pipeline are administered by CODC.

In addition, part of the Project Site within Bendigo Station is subject to the Bendigo Conservation Covenant (the Covenant) under Section 77 of the Reserves Act. One of the four objectives of the Covenant agreed between the Landowner and the Minister is that the land will be managed to maintain the historic values of the land as referred to in *The rich fields of Bendigo* by Jill Hamel, February 1993.

The conditions of the Covenant allow for grazing to an extent that is consistent with, in the opinion of the Minister, the objectives of the Deed and maintenance of all fences and gates on the land and its boundary in a good stockproof condition in order to facilitate proper grazing control.

The Covenant requires the landholders to keep the land free from noxious plants, rabbits and vermin, rubbish and other offensive material as far as practicable. The Covenant places restrictions on the following activities without the Minister's prior approval:

- a. The erection of any fence, building, structure or other improvements near historic sites on the land whether for the Landholders purpose or for other private or public purposes.
- b. Any cultivation earthworks or soil disturbance on the land near the historic sites.
- c. Any tree planting on the land near the historic sites.
- d. Any prospecting or mining for minerals, coal or other deposit on or under the land.

The Covenant also sets out public access rights and access to Department of Conservation to undertake compliance visits as well as maintenance of the historic sites. Specific access arrangements are set out for the Rise and Shine Creek area ensuring public access and enabling Department of Conservation Staff to undertake preservation work on the historic sites and the Minister to erect interpretation signs as part of the landscape.

The applicant is seeking an amendment to the Bendigo Conservation Covenant as defined in clause 41 of Schedule 6 of the FTAA 2024.

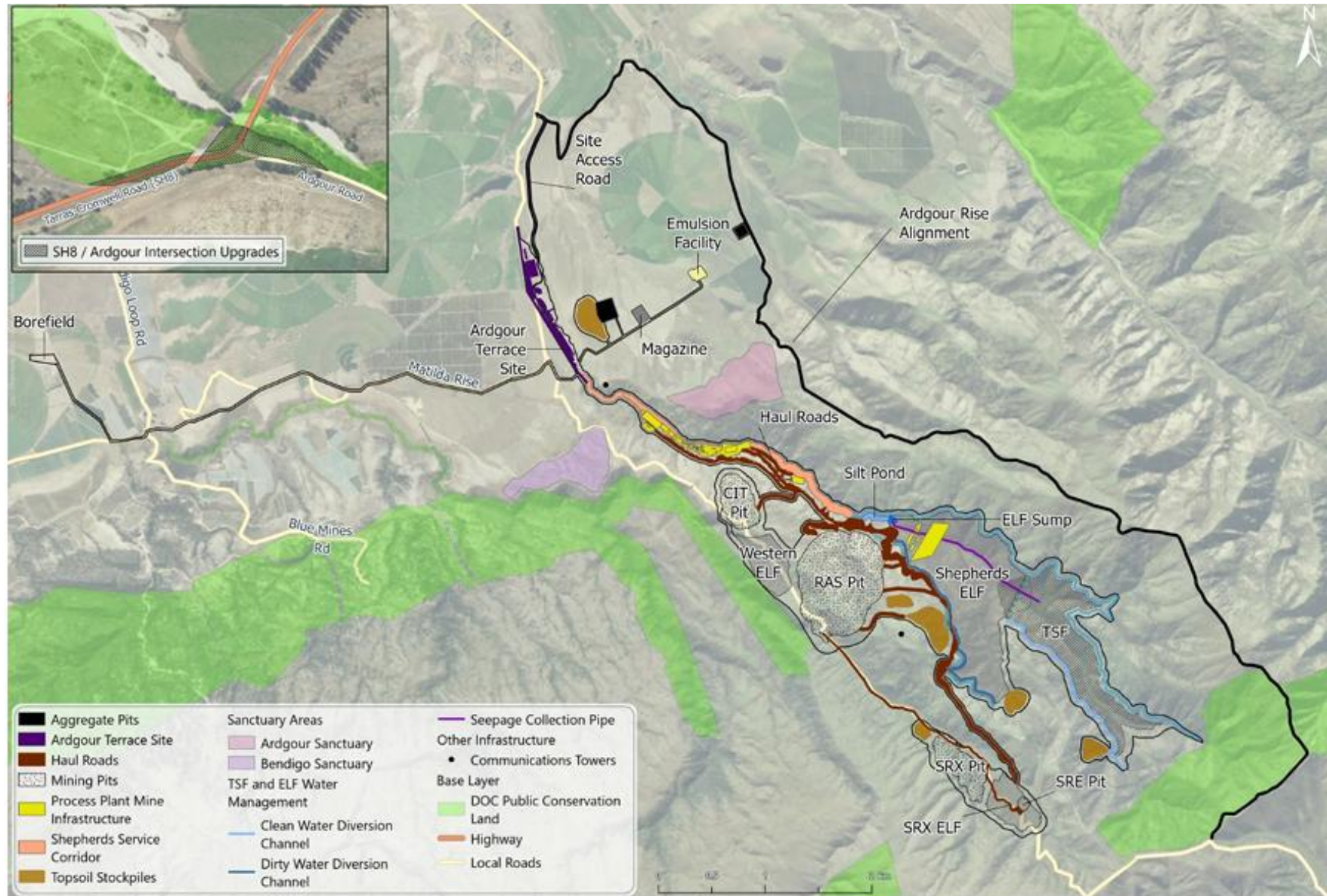


Figure 1. Project Site- Layout of the Bendigo-Ophir Gold Project included in A.08- Section 1 of the Substantive application (Figure1-3 p 10)

The following activities have the potential to affect recorded and unrecorded archaeological sites within the **Project Site**:

- Establishment of the RAS, CIT, SRX and SRE Open Pits.
- Establishment of the Tailing Storage Facility (TSF) in the upper reach of Shepherds Valley and the establishment of the three Engineered Landforms (ELF). The Western ELF, between the CIT and RAS pits; the SRX ELF next to the SRX Pit and the Shepards ELF abutting the TSF.
- Establishment of Topsoil Stockpiles.
- Establishment of the hard-rock gold processing plant, associated infrastructure and ancillary activities in the lower reaches of Shepherds Valley.
- Establishment of supporting infrastructure include upgrading and realignment of Ardgour Road and Thomson Gorge Road as well as the construction of internal mine access and haul roads, water and utilities infrastructure.
- Establishment of workshops and temporary infrastructure within the lower Shepherds Valley, although some of that seems to be within the Shepherds ELF.
- Establishment of two aggregate pits on agricultural land on the Bendigo/ Ardgour terraces.

The works above will require large scale earthworks including excavations at depth within the footprints of all four open pits as well as topsoil stripping prior to the construction of the TSF, ELFs and the topsoil stockpiles as well as prior to the construction of all supporting infrastructure. This will result in the destruction of all recorded and unrecorded archaeological sites within the footprint of these activities. Two sites within the Project Area will be retained (G41/4 and G41/5).

The proposed excavation methodology will require blasting activities, which if left unmitigated, vibrations from blasting could affect unreinforced masonry heritage structures of which there are a number to the west and northwest of the Project Area (not included in the authority application area). K.06 – *Marshall Day Acoustics- BOGP Blasting Vibration Effects on Heritage Structures* (10 March 2026) sets out a brief assessment of potential vibration levels caused by blasting and proposes a Blasting Vibration Management Plan informed by dilapidation surveys, test blasts and blast design optimisation to establish mitigation requirements.

BOGP Consent Area: Encompasses the entire Project Area and includes exploration activities, mining operations within the Project Site, and all associated ancillary, monitoring, mitigation, off-setting and compensation activities and supporting infrastructure and activities within, and in the vicinity of, the Project Site.

The wider Consent Area remains within the privately owned Bendigo and Ardgour Stations. However, it is located adjacent and, in some cases, intersects with land administered by the Department of Conservation (see Figure 2). This includes the Bendigo Historic Reserve - located immediately to the west – containing a range of historic sites and features. The proposed Come in Time Concession Area and the Willow Concession Area (depicted in C.24- *Proposed Concession Overview* (10 March 2026)) cross through the Bendigo Historic Reserve. The Bendigo Conservation Area and the Ardgour Conservation Area are located to the southeast and southwest of the site, respectively. The Ardgour Rise Concession Area crosses the Ardgour Conservation Area south of the Project Site.

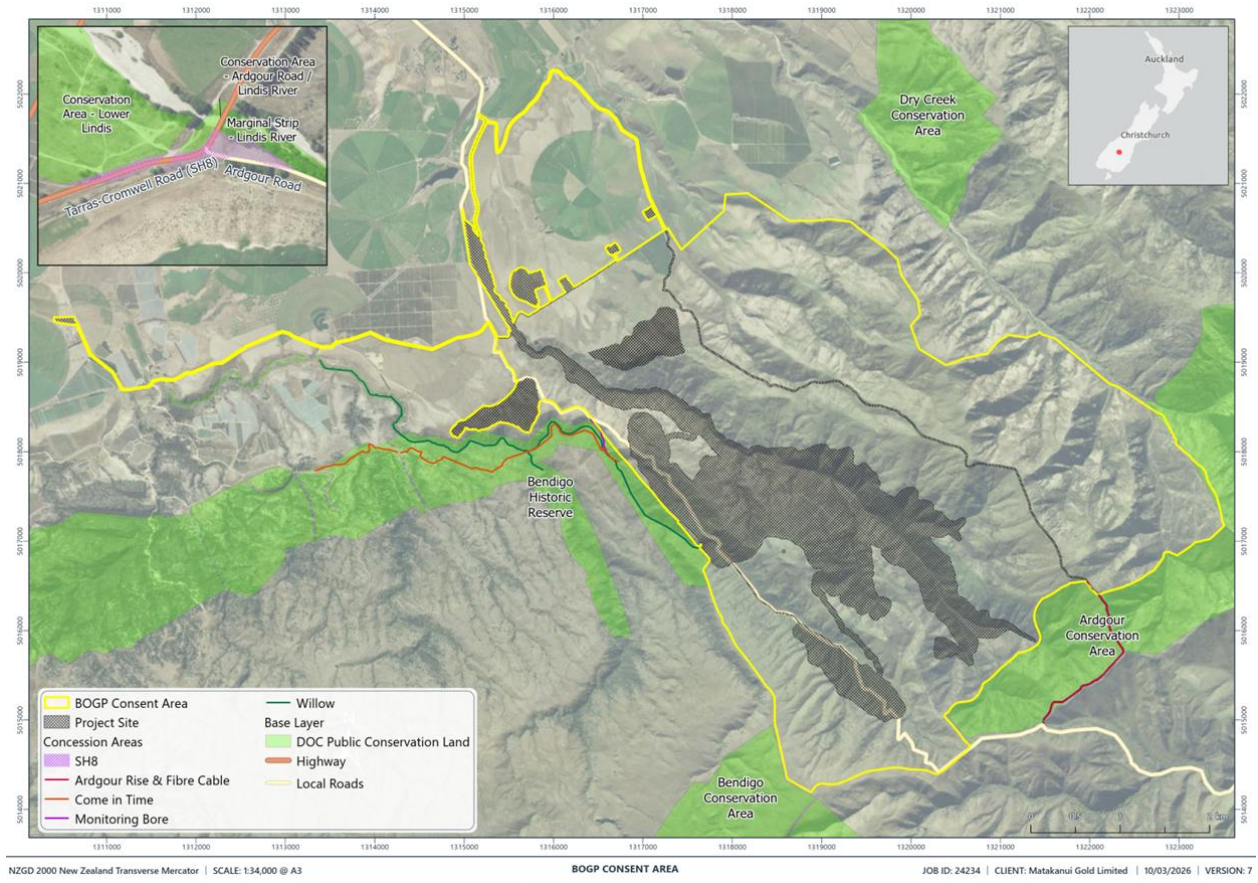


Figure 2. BOGP Consent Area- C.03 included in the substantive application dated 10 March 2026

Within the wider Consent Area, proposed activities have been appraised for potential effects on recorded and unrecorded archaeological sites. These appraisals have been discussed below in relation to the particular activity.

- Establishment of Ardgour Rise was appraised by New Zealand Heritage Properties (NZHP) (B.37-NZHP 2025d) drawing on desktop analysis and a field survey. No recorded or potential unrecorded sites were identified within the road alignment. The recommendation was to undertake the works under an Accidental Discovery Protocol (ADP) with a briefing by a suitably qualified archaeologist prior to the commencement of work. HNZPT agree with this recommendation.
- Establishment of replacement walking route to Come in Time Battery was appraised by NZHP (B.38-NZHP 2025e) drawing on desktop analysis and a field survey. The proposed track starts at Logan Town and travels east to the Come in Time battery. Includes installation of way markers along the route and vegetation clearance. No earthworks proposed. The placement of way markers and vegetation clearance will avoid all identified heritage sites and will be guided in the field during works by an archaeologist to ensure that any unrecorded archaeological sites are avoided, including shifting locations of way markers and vegetation clearance with hand tools to avoid modification to archaeological sites. Thus, no archaeological authority is required. HNZPT agrees with this recommendation and supports the avoidance approach.

Discussion was had with the applicant at the Heritage Worksop on 16th February 2026 regarding the proposed Crack Willow management along Bendigo and Clearwater Creek. The applicant confirmed that the proposed works were not included in the current Authority Application Area. These works are proposed as ecological mitigation and would require consideration of removal methodologies; they will work with their heritage consultant to manage removal to not affect heritage. HNZPT confirmed that any potential modification to archaeological sites would require an archaeological authority for these works.

No archaeological appraisal has been included for the establishment of two predator-exclusion fenced areas within Bendigo and Ardgour Station nor are these included within the Authority Application Area. An appraisal for this activity should be completed to determine whether an archaeological authority is required.

The application states that the mine has a life of fourteen years and once mining activities are completed remediation will take place. Remediation activities will be within the areas already impacted by establishment of the mine so will have no effect on archaeological sites.

Archaeological Assessment

The Bendigo-Ophir Gold Project: A Heritage Assessment prepared by New Zealand Heritage Properties Ltd (2025) was submitted with the substantive application. The assessment was subsequently updated after requests for additional information were received and considered. The revised version, and version referenced in this assessment, is listed in the substantive application as B.34A and B.34B - New Zealand Heritage Properties Ltd- Heritage Assessment (NZHP 2025a) (10 March 2026) (the NZHP Assessment).

In addition, the following appraisals were also completed for areas within the authority application area and submitted with the substantive application: B.35 Magazine and Emulsion Tank Memorandum (NZHP 2025b) and B.36 Construction Camp Heritage Assessment (NZHP 2025c).

The area of the proposed Magazine and Emulsion Tank was initially appraised as not requiring an archaeological authority (NZHP 2025b); however, these areas have been included in the authority application area.

A second heritage assessment was submitted for the Construction Camp (NZHP 2025c), these proposed works have already been granted an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014. 2025-576, granted on 22 July 2025. Works under this authority started on 19 August 2025.

Two other authorities are currently active within the Project Site:

2025-574 for earthworks associated with an intensive drilling program to test the quality and nature of subsurface gold-bearing deposits at Section 11-12 Survey Office Plan 24641, Cromwell. The authority enables the modification or destruction of G41/264, G41/266, G41/267, G41/269, G41/584, G41/658, and possible subsurface sites, to be determined. Granted on 22 July 2025, works are yet to start for this authority. The archaeological sites included in 2025-574 are also included within the substantive application, however the proposed scope of works is different and the impacts on the recorded and unrecorded archaeological sites are greater. Activity permitted under 2025-574 was limited to localised destruction within proposed drilling locations and will result in the destruction of G41/658 (House/hut terrace with artefacts and prospecting pit) G41/266 (Stone Hut), G41/267 (Stone Hut with Chimney), G41/269 (Rise and Shine Dam) and modification of G41/264 (Rise and Shine Gold Workings) and G41/584 (Rise and Shine Water Race). As set out below, the activities under this Fast-track authority application will result in the destruction of G41/264 (Rise and Shine Gold Workings) and greater levels of modification to G41/584 (Rise and Shine Water Race).

Description of recorded and potential unrecorded archaeological sites within the Authority

Application Area

The Bendigo area lies on the north-eastern side of the Dunstan Mountains and is characterised by schist outcrops that contain quartz reefs, which in turn host gold, antimony, and tungsten (Carpenter 2013). These geological resources led to extensive mining throughout Bendigo and the wider Central Otago region (Hamel, 1993).

Mana whenua have a long association with Central Otago. Evidence of Māori occupation dates from at least the 14th century and includes moa hunting camps, rock shelters, ovens, stone-working areas, and food-gathering sites (Hamel 1993, p.7). A site is located within 1km to the west of Project Area, which is a cave with a paddle found inside recorded as G41/53. This was recorded in the 1870s but reference to this have placed the site near to Logantown, the now defunct settlement that was once very populous in Bendigo. Further and more recent sites have been recorded in valleys within 8km of the Project Area and along both sides of the Mata-Au (Clutha River). Prior to Pākehā arrival, the river served as a key travel route through the region, providing access to pounamu sources, particularly around Lakes Wānaka and Whakatipu-wai-Māori. An ara tawhito (traveling route) crossed Thomsons Saddle, east of the Project Area, providing inland access. While the exact route is unknown and no archaeological evidence has been recorded within the Project Area, there remains low potential for unidentified or subsurface sites.

Mana whenua also maintained a presence in Bendigo during the gold rush era. For example, William Gilbert Mouat was a trained surveyor and held a stake in a claim at Bendigo (Carpenter 2013b, p. 117). This is unlikely to be an isolated case, as other locations across Central Otago have been named for mana whenua miners, such as 'Māori Point' near Queenstown. However, due to the polyglot nature of the mining population, additional Māori miners were often not distinguished within historical narratives.

Pākehā settlement expanded into Central Otago from the 1850s through large pastoral runs. Part of the Project Area formed part of Run 238 (Morven Hills), taken up by the McLean family. The run was used primarily for sheep grazing until subdivision in 1910. Two archaeological sites from this pastoral period have been recorded within the Project Area: a Rabbiter's hut (G41/4) and stockyards (G41/5).

Gold discoveries in the early 1860s led to rapid development of mining across Bendigo. Access to the area was aided by routes across Thomsons Saddle and by water diversions from Thomsons Creek. Several mining operations developed within the Rise and Shine Valley and surrounding catchments, the following provides an overview of these. Note that sites at Alta and Eureka will not be impacted by the works but will be retained as mitigation and the background of these areas has been included for context.

Recorded sites within the authority application area

There are 30 recorded sites within the authority application area. These have been identified or described as the result of several separate surveys undertaken of the wider Bendigo Goldfields area and include:

- Limited survey by M, Newman and P, Croad in 1977.
- Systematic survey across the Bendigo Area by Chris Jacomb and Sheridan Easdale in 1980.
- Jill Hamel’s survey in 1990 to inform the Department of Conservation on the Heritage sites within Bendigo Station as part of the implementation of the Protected Natural Areas Programme.
- Reg Nichol and Les Wright's 2005 survey focused on accurately defining the extent of recorded sites along the Rise and Shine Creek, number of new sites also identified and recorded.
- Matt Schmidt and Shar Briden survey in 2012 which focused on Thomsons Creek Valley and Thomsons Saddle, outside of the authority application area but did result in the recording of further sections of the Rise and Shine Water Race (G41/584).

Further work that contributes to the understanding of the recorded sites within the authority application area and the wider archaeological landscape includes:

- Lloyd Carpenter’s detailed historic research of the Bendigo and Rise and Shine areas or his PhD thesis.
- Peter Petchey use of the Come in Time and Alta batteries for his PhD research.

Nine field surveys were also undertaken to inform the NZHP Assessment between 2017 and 2025. These pedestrian surveys focused on previously recorded features or sites and transects centred on valley floors or ridgelines as vantage points. Where sites could not be accessed due to vegetation or topography reliance was on Aerial Images and LiDAR of these areas.

18 recorded sites were revisited within the authority application area and the Site Record Forms updated. A further 10 new archaeological sites were identified primarily through LiDAR analysis (including G41/589, G41/266, G41/267, G41/273, and G41/606). Site G41/589 was only observed from a distance. Overall, the site surveys indication that the mining landscape remains in good condition with vegetation being the main obstruction in finding or identifying sites.

The Rise and Shine workings (G41/264, G41/265, G41/266, G41/267, G41/269, G41/273, G41/277, G41/584, G41/606, G41/658 and G41/783)

G41/264	Rise and Shine Gold Workings
G41/265, G41/266, G41/606, G41/273, G41/267	Stone huts
G41/269	Rise and Shine Dam
G41/277	Rise and Shine Mine and Battery
G41/584	Rise and Shine Water Race
G41/658	House/hut terrace with artefacts and prospecting pit
G41/783	Track

The Rise and Shine workings encapsulate an early, long-lived, and well-preserved, water-worked mining landscape. The first alluvial mining within Bendigo was concentrated in lower Bendigo Creek around the Rise and Shine Valley (as well as around Aurora Creek and Goodall’s hotel) from around 1862 onwards. Uniquely, early gold mining efforts at Rise and Shine were largely crewed by a successful group of Swedish

miners in the mid-1860s, although later quartz mining efforts dominate the history of the site. Work was undertaken in 1864-1865 to build a 11-mile water race (G41/584) to bring more water into the Rise and Shine Valley. Stone houses (some or all of G41/265-267, G41/273, G41/606, G51/658) were built close to the claim area, linked by a track to the workings (G41/783).

In 1870 the Alta Reef was founded up gully, and the five stamp Rise and Shine Battery (G41/277) was erected along with a water race to drive the machinery. In 1873, the uniquely double-layered Rise and Shine Dam (G41/269) was constructed at the southern end of the claim to provide water to the mining operations. These operations weren't successful and machinery was sold in 1874 to the Eureka Syndicate, who sunk a mine at the battery site, which closed down in 1876 due to the mine shaft flooding. In 1880 the battery was shifted across the Bendigo Creek, but continued to have disappointing gold yields. In 1902 the battery was moved again back to its original side of the creek. At this point in time it was worked with a 7-horsepower engine and was fed by a four-mile race from higher up Bendigo Creek, and from Clearwater Creek. A 35-foot shaft was sunk on the quartz reef and although 100 tonnes of stone was processed, yield remained poor and the mine closed by 1906. These 35 years of operations at the Rise and Shine sluicing site (G41/264) are notable for being the longest running, and one of the largest, continuous operations in the Otago Goldfields.

In 1932, the mine sunk by the Eureka Syndicate was opened again and extended by the Bendigo Rise and Shine Company. After identifying a rich source of gold, miners' huts were built (some or all of G41/265-267, G41/273, G41/606, G51/658), and a crusher, grinding pan, grinding mill, ore roasting plant, and tram line were built. By 1937, the Bendigo Rise and Shine Company lacked the investment for profitable returns and operations ceased. However, that same year the Shine Again Gold Mining Company formed and installed a new five head quartz battery and tramline. Mining finally ended in 1942 and the remains of the Shine Again Gold Mining Company battery and tramline are included in site G41/277.

Both Heather Bauchop (author of the report informing the listing of the Bendigo Quartz Reefs Historic Area) and Jill Hamel (author of the report informing the Bendigo Conservation Covenant) recognise the extraordinary historic values of the Rise and Shine Complex: the Rise and Shine Valley was one of the very first mining areas within Bendigo, and was indeed the longest running continuous mining operation in Otago. The intensive landscaping, machinery, and human effort involved in the alluvial mining at Rise and Shine has left a landscape that evidences the full 80-year span of gold mining history in this area from 1862 to 1942. The Rise and Shine Complex is the epitome and embodiment of the Otago gold rush, for which it is included within both the Bendigo Quartz Historic Area and Bendigo Conservation Covenant Area. The principal historic values of the Conservation Covenant lie in the Rise and Shine Creek area.

The Shepherds Creek Complex (G41/6, G41/678, G41/784, G41/785, G41/786, G41/787, G41/788, G41/789, G41/790 and G41/792)

G41/6, G41/790, and G41/792	Water Races
G41/678, G41/784, G41/785	Stone huts
G41/786	Hut terrace
G41/787 and G41/788	Mine tailings
G41/789	Sluicing

In contrast to the Rise and Shine Complex, the Shepherd's Creek Complex refers to a grouping of sites based on their location along Shepherd's Creek, rather than a unified mining operation. Water from Shepherd's Creek was diverted through water races from the late 1860s to a variety of claims, including that of the Koh-i-noor Syndicate and the Cromwell Company. Water races G41/6, G41/790 and G41/792 are at the northernmost end of Bendigo mining operations, providing water to lower Alta, Come in Time, and Rise and Shine operations. Hut sites G41/678 and G41/784 are platforms further up the Shepherd's Creek valley, and were likely tent or hut sites based on the shist stones and stacked shist chimney that

remain. Further up the valley again are G41/785 and G41/786, which are potentially campsite remains (an earth mound and remnants of a fireplace, respectively). Sites G41/787, G41/788, and G41/789 are towards the southern terminus of the creek. G41/787 and G41/788 are small areas of tailings, likely relating to small-scale mining. G41/789 records sluicing faces – a sluiced channel with displaced shist slabs across a hillside. The water races are the only sites within this group located within the Bendigo Conservation Covenant Area, and none are present within the Bendigo Quartz Historic Area.

The Come in Time workings (G41/251, G41/256, G41/586, G41/589, G41/604 and G41/605)

G41/251	Come in Time Battery and Mine
G41/256	Come in Time Gold Workings
G41/586	Come in Time Water Race
G41/589	Road associated with Come in Time Battery
G41/604	Alta/Come in Time turbine and chimney
G41/605	Alta/Come in Time gold workings

The Come in Time complex developed after a quartz reef containing gold was discovered on the ridge between Rise and Shine and Shepherd’s Creek in 1880. The battery from the Eureka claim was relocated to the Come in Time operations (G41/251), and water race G41/586 was cut to feed the water wheel and battery. The gold yield was low, and mining at Come in Time ceased in 1881, less than a year after it began. The Come in Time battery was sold and moved to the Last Shot Quartz Mining Company claim. In 1908 the Come in Time mine was reopened, and half of the Matilda Battery was moved to the Come in Time site. Low yields again caused the mine to close within the span of a year, with a similar short stint of mining for several months in 1910.

In 1913 the Alta Syndicate briefly mined a quartz outcrop just to the north of the Come in Time battery, constructing an aerial ropeway (still present today) to move stone to the battery. These areas of mining occupied by the Alta Syndicate are recorded as G41/604 and G41/605 and contain a range of features including a fireplace/forge, turbine, adit and shafts, and machinery components. Tailings and sluice faces from the Come in Time operations (G41/256) are spread over a wide area to the northwest of the battery, G41/589 records a stone revetted road approximately 90 metres from the battery, visible in 2005 as a sturdily stacked area of stone revetment. The impressive Come in Time battery was restored by the Otago Goldfields Heritage Trust in 2008 and is a prominent landmark in the Bendigo landscape. The heritage values of the Come in Time complex are recognised through inclusion in the Bendigo Conservation Covenant Area, with the Come in Time battery itself included in the Bendigo Quartz Reefs Historic Area and is the exemplary site of technological significance/value in the Historic Area. Matakanui–Bendigo Road (G41/782).

Matakanui-Bendigo Road

The Matakanui-Bendigo Road (site G41/782) is a long feature extending the length of the southern side of Shepherd’s Creek Valley. It was surveyed in 1898, possibly following an earlier track along the same route, to open up new areas of Bendigo to mining endeavours. Further works took place after 1900 to improve and widen the road, with money being granted in 1902 to make the track wide enough for dray to use. Surveys of the road have identified nine culverts, two revetments, and two culverts/revetments along the road made from stacked shist. It’s not possible to determine which of these stone features are pre- or post-1900. Most features are still of good condition and are easily identifiable, especially given the road remains in use. Two areas recorded extent of the road cross into the Bendigo Conservation Covenant Area, but it is not a defining feature of the Covenant.

Potential for further unrecorded sites

It is anticipated that there may be further sites to be encountered either subsurface or in areas of vegetation. These are anticipated to be further mining sites such as mine shafts, tailings, water races, sluicings etc; or related occupation sites such as huts, chimneys, terraces, building foundations etc. Any such unrecorded sites will likely be destroyed due to the extent of the earthworks for this Project. There is also a potential for sites of interest to Māori to be encountered. These may be sites including camp sites, moa hunting camps, rock shelters, ovens or stone working areas as found elsewhere in the region.

Effect of proposed activity on each archaeological site(s)

1 sets out a summary of the impacts on the recorded archaeological sites as set out in the NZHP Assessment.

1Site	Name/site type	Impact of works on site
Morven Station		
G41/4	Rabbitier's Hut Stone Hut	No Impact-within the construction compound but outside of proposed works footprint- works enabled under 2025/576
G41/5	Stock yards	No Impact-within the construction compound but outside of proposed works footprint- works enabled under 2025/576
Water races		
G41/6	Water race	Major impact – extent of the water race will be destroyed
G41/584	Rise and Shine Water Race	The portion where the water race intersect the site will be destroyed, estimated to be 2.5% of the entire length of the feature so the overall impact will be minor impact.
G41/586	Come in Time water race	The portion where the water race intersects the site will be destroyed, estimated to be 3% of the entire length of the feature so the overall impact will be minor.
G41/790	Water race	The portion where the water race intersects the site will be destroyed, estimated to be 50% of the entire length of the feature so the overall impact will be minor.
G41/792	Water race	The portion where the water race intersects the site will be destroyed, estimated to be 30% of the entire length of the feature so the overall impact will be minor-moderate.
Rise and Shine Workings		
G41/264	Rise and Shine Creek Gold workings	Major impact – destroyed
G41/265	Rise and Shine Creek Stone Hut	Major impact – destroyed
G41/266	Rise and Shine Creek Stone Hut	Major impact – destroyed
G41/267	Rise and Shine Creek Stone Hut	Major impact – destroyed
G41/269	Rise and Shine Dam	Major impact – destroyed
G41/273	Stone hut	Major impact – destroyed
G41/277	Rise and Shine Mine and Battery	Major impact – destroyed
G41/606	Stone hut	Major impact – destroyed
G41/658	Hut terrace	Major impact – destroyed
G41/783	Track	Major impact – destroyed
Shepards Creek Workings		
G41/678	Stone hut	Major impact – destroyed
G41/784	Hut site	Major impact – destroyed
G41/785	Hut site	Major impact – destroyed
G41/786	Hut Terrace	Major impact – destroyed
G41/787	Tailings	Major impact – destroyed
G41/788	Tailings	Major impact – destroyed
G41/789	Sluicing	Major impact – destroyed

1Site	Name/site type	Impact of works on site
Come in Time		
G41/251	Come in Time Battery	Minor Impact - the majority of this site sits outside the Project Area, but earthworks may modify up to two heritage mine drives ¹ . Current access will be removed, and a new access path will be established as per the Come in Time Concession Area
G41/256	Gold working	Minor Impact - A small portion of this site will be impacted by earthworks, but most will be left in situ
G41/589	Revetted road	Major impact – destroyed
G41/604	Gold working	Major impact – destroyed
G41/605	Gold working	Major impact – destroyed
Matakanui-Bendigo Road		
G41/782	Matakanui-Bendigo Road	Major impact – approximately 85% will be removed

Table 2. Summary of the impacts of works in the recorded archaeological sites in Project Area (NZHP Assessment).

¹ Information comes from included in Woods and Thorrold assessment. No further information about the specifics of the damage was included. Expansion of the effects on the archaeology was included in the letter sent by HNZPT on the 15/12/2025.

Archaeological values of the sites affected

Heather Bauchop, in compiling the report for the report for the Bendigo Quartz Historic Area, and Jill Hamel, in compiling the report for the Bendigo Conservation Covenant, applied a specific methodology to assess the significance of mining sites at Bendigo. Both authors took the approach that this landscape can only be understood as complexes or groupings relating to specific claims and settlements. The mining landscape is continuous, and sites are best understood in their relationships to each other as part of a claim or community, and to the other collections of sites across Bendigo. Indeed, the history of the sites at Bendigo is made complex in that batteries moved within and between claims, tailing water and races were diverted to new batteries, and mines were abandoned by one company were picked up by another. To discuss each discrete archaeological site without recognising it as part of a complex and a landscape is to misunderstand the values and importance of the sites. Hamel notes that it “is more illuminating to look at entire landscapes as entities, an extension of the principle of looking at sites as groups and systems within a landscape, rather than as separate entities each with its own site record form”.²

To this end, Hamel organised the Bendigo landscape by alluvial workings with their settlements and major buildings, battery sites and mines, and a third category of ‘inevitable miscellanea’. Likewise, Bauchop organised the Bendigo landscape into areas of historic mining activity: the Rise and Shine Claim and the Cromwell Quartz Mining Company Claim, Eureka, Alta, and Come in Time operations, Logantown and Welshtown.

The conservation Covenant acknowledges that the principal historic values lie inside the Rise and Shine Creek area (as well as domestic and commercial sites outside of Rise and Shine, and mining sites in Perrys Creek), Bauchop identified that the key values of significance for the Bendigo Quartz Reefs Historic are aesthetic, archaeological, historical, and technological. Those sites that illustrate the entire mining history of Bendigo provide the significant archaeological values. Similarly, the areas that tell the story of 1860s alluvial mining into the Depression-era mining of the 1930s provide historical significance and exemplify the gold mining aspect of New Zealand history. Mining remains, including workings, shafts, races, and batteries, provide high technological values.

HNPZT has taken a similar approach – understanding the sites within their group and landscape context, and assigning highest values to those features that lie inside the Rise and Shine Complex. Rise and Shine exemplifies and encapsulates the full mining history at Bendigo, exhibits a full suite of interrelated mining features, and demonstrates fully the technology used to extract gold in the nineteenth century. The values as assessed below demonstrate that the significance of the archaeological sites at Bendigo largely derives from the collective integrity of the mining landscape and the relationships between the individual features within it.

The archaeological values of the sites have been assessed according to the following site complexes:

- Rise and Shine workings (G41/264, G41/265, G41/266, G41/267, G41/269, G41/273, G41/277, G41/584, G41/606, G41/658, and G41/783).
- Shepherd’s Creek Complex (G41/6, G41/678, G41/784, G41/785, G41/786, G41/787, G41/788, G41/789, G41/790, and G41/792).
- Come in Time workings (G41/251, G41/256, G41/586, G41/589, G41/604, and G41/605).
- Matakanui–Bendigo Road (G41/782).
- Unrecorded sites relating to gold mining.
- Unrecorded sites relating to Māori occupation.

² Hamel, J. (1993). The rich fields of Bendigo. Department of Conservation, pp. 39.

Rise and Shine Workings (G41/264, G41/265, G41/266, G41/267, G41/269, G41/273, G41/277, G41/606, G41/658, G41/584, G41/783)

Condition: Good. Overall, the sites within this complex are in good condition and easily interpretable. Although some disturbance has occurred through later mining and farming activities, and huts G41/273 and G41/606 are obscured by vegetation, the overall archaeological landscape remains well intact.

Rarity / Uniqueness: Unique. The Rise and Shine workings represent a particularly well-preserved mining landscape that shows the progression from early alluvial mining to later quartz extraction. It is rare to have a complex of sites like this that can speak to decades of gold mining history within a single area, can demonstrate all aspects of alluvial operations, and can be reliably tied to individuals and key syndicates. The Rise and Shine Dam (G41/269) is notable for its unusual two-level stone construction, a feature rarely documented in other Central Otago mining areas. Carpenter (2012) states that the most important archaeological site within Rise and Shine is the water race (G41/584), which enabled miners to undertake the longest-running mining operations in the whole of the Central Otago gold rush.

Contextual Value: Very High. In itself there is a lot of contextual value as a group of related archaeological sites, and the workings form a central point of the wider Bendigo mining landscape and retains clear relationships with other mining sites and occupation areas. Operations at Rise and Shine span the full mining history of Bendigo, connecting it to all other aspects of the mining landscape.

Information Potential: Moderate. Archaeological investigation of the sites would not add greatly to our knowledge of the history of this landscape. Excavation may provide more information on spatial patterns of the mining features and the extent of archaeological features. It may be possible to gain a greater understanding of construction techniques and the development of the landscape over time.

Amenity Value: Very High. The visible extent and variety of features within a well-defined area provide strong interpretive value within the Bendigo mining landscape. The ruins of the stone huts, mines, and battery have very high aesthetic value. The Bendigo Historic Reserve allows for public access and enjoyment of the sites (and it is a popular attraction for heritage tourists), and recognition as a Historic Area provides interpretation and understanding of the area.

Ethnicity: Pākehā.

Shepherd's Creek Workings (G41/6, G41/678, G41/784, G41/785, G41/786, G41/787, G41/788, G41/789, G41/790, G41/792)

Condition: Moderate to good. The sites include hut remains, terraces, sluicing features, and tailings deposits in good condition and reasonably recognisable, though parts of the area are overgrown. Water race G41/792 is in particularly good condition, and easily able to be identified.

Rarity / Uniqueness: Moderate. Mining features present within the Shepherd's creek workings are relatively common within Central Otago and the Bendigo landscape.

Contextual Value: Moderate. The sites form part of the wider Bendigo mining landscape though lacking in the same intra-complex contextual values present for Come –in Time and Rise and Shine, and the ability to be tied to persons or companies.

Information Potential: Moderate. Previous archaeological investigation in the area has been limited to date, so there is a greater opportunity to identify hitherto unrecognised gold-mining

features. For a number of sites, such as water races, terraces, and sluicings, archaeological investigation cannot provide much novel information. Beyond this, archaeological investigation may reveal new information about the use of the sites (particularly the hut/tent sites).

Amenity Value: Low. Although the Shepherd's Creek sites have a lower density of sites than other complexes in the Project Area, the landscape still provides a tangible insight into Bendigo's gold mining history, and hut sites have high aesthetic values. However, many of the sites are on private land and are not visible to the public and lack interpretation.

Ethnicity: Pākehā.

Come –in Time Workings (G41/251, G41/256, G41/586, G41/589, G41/604, G41/605)

Condition: Good. The Come –in Time battery was restored in 2005, mining features are easily visible, and the revetted road and double layered dam are in good condition. While some disturbance from later land use is evident, key features remain easily identifiable.

Rarity / Uniqueness: High. Although mining sites are relatively common across Otago, the intact nature of the complex increases the rarity, along with its known association to key people and developments in the Otago gold rush. The restored battery is in uniquely good condition.

Contextual Value: Very High. The site features represent a linked series of gold working ventures within the same valley across decades, and are connected to the wider Bendigo goldmining landscape. The association between the battery, water race, and mining workings clearly illustrates the operational structure of mining activities in the area. As with the Rise and Shine Complex, the sites can be reliably tied to key figures and syndicates of the Otago gold rush.

Information Potential: Moderate. Excavation may provide further information on spatial patterns of the mining features the extent of archaeological features, and the sequence of events at the site. Machinery remains at G41/604 and G41/605 may reveal new information about goldmining technology (although it is uncertain whether these remains are archaeological, i.e. pre-1900).

Amenity Value: Very High. The reconstructed battery is a distinguishing feature within the landscape, and interpretation highlights the historical significance of the area. The Bendigo Historic Reserve allows for public access and enjoyment of the sites (and it is a popular attraction for heritage tourists). The collection of related features in a confined area allows for public understanding of the process of pre-1900 goldmining.

Ethnicity: Pākehā.

Matakanui–Bendigo Road (G41/782)

Condition: Good. There are some aspects of the road that have been modified by ongoing use, but the early features such as culverts, stone revetments and survey pegs are still visible and are in good condition.

Rarity / Uniqueness: Moderate. While roads have been commonly recorded in and around Otago, there are not many that have so many intact features including culverts and revetments still present and so clearly visible.

Contextual Value: High. The road formed an important transport route linking mining settlements and facilitating access to workings in Bendigo.

Information Potential: Low. Features such as stone culverts and revetments are not likely to yield much new information about the formation or construction of road that could not be gleaned from surveying.

Amenity Value: High. The features of the road retains strong visual and interpretive value within the historic landscape, and parts of the road are present within the Bendigo Conservation Covenant Area. There is value to having visitors use the same roading infrastructure that minors used during operations in Bendigo.

Ethnicity: Pākehā.

Unrecorded Archaeological Sites

Condition: This will likely depend on the type of site. Unrecorded water races or transport sites are likely to have been highly impacted by mining, farming and road/track formation. More robust features such as adits or battery platforms will likely be in better condition. However it should be considered that Bendigo is a well-researched and surveyed landscape, so sites that have not yet been identified are unlikely to be in good condition.

Rarity/Uniqueness: Moderate to high. Depending on what the identified features are they are likely to be moderate to high in rarity/uniqueness in line with the other features identified within the Project Area.

Contextual Value: Moderate to High. Sites within the Bendigo landscape naturally have high contextual value due to their association with the extensive historical mining landscape.

Information Potential: Low to Moderate. As any unrecorded sites are unlikely to be in good condition or in association with the well-surveyed complexes, it's not likely that newly encountered sites will add greatly to our knowledge of human activities at Bendigo.

Amenity Value: Likely low. If they remain unrecorded to date, they are unlikely to be prominent or identifiable features in the landscape and will only be encountered during their destruction.

Ethnicity: Pākehā

Unrecorded Sites of Interest to Māori

Condition: Likely poor to fair due to the extensive modification of the landscape through mining and pastoral activities.

Rarity/Uniqueness: High. There have been very few Māori archaeological sites recorded in the wider area, and none within the Project Area.

Contextual Value: Moderate. Due to the dearth of Māori sites in the wider area, such sites would not be well placed to provide a greater contextual understanding of Māori activities in this landscape.

Information Potential: Moderate. This depends on the nature of the site. Features such as rock shelters, temporary camps, or other occupation evidence may reveal more about the path of the ara tawhito that passed through this area. Archaeological material may provide potential for radiocarbon dates and insights into seasonal movement and resource use.

Amenity Value: Likely low. If they remain unrecorded to date, they are unlikely to be prominent or identifiable features in the landscape, and will only be encountered during their destruction.

Ethnicity: Māori.

Overall Significance

The Project Area overlies the Rise and Shine Complex, which is an exemplary archaeological landscape. Its significance can't be overstated. It is a collection of well-preserved, extensive, and interconnected water races, gold mining features, occupation sites, and transport infrastructure. The archaeological landscape retains high contextual and interpretive values, with many sites being well-preserved due to the harsh, but dry conditions and somewhat isolated nature of the area. This has allowed for clear spatial relationships between water supply systems, extraction areas, processing infrastructure, and occupation sites to remain into the present. Collectively, these features demonstrate the full span of technological development and change over time in gold mining methods in Central Otago from the early alluvial phase through to later quartz mining. It tells the full story of the difficulties faced and challenges overcome or succumbed to by generations of gold miners.

The Come in Time complex is likewise of high significance, capturing a related landscape of mining features relating to key historical figures of the Otago gold rush. Striking features such as the restored battery are easily accessible to the public. While the Shepherd's Creek Complex and the Matakanui-Bendigo Road do not have the same connection to key developments in the history of Bendigo, nor the same high amenity and rarity values, they nevertheless contribute to the intactness of the landscape as whole, the technological values that it presents and the interpretive value of its historic mining landscape.

Effects of proposed development on the archaeological values and broader historic heritage values

The proposed development will result in the loss of all recorded gold-working archaeological sites within the Rise and Shine complex and Shepherd's Creek, and some sites within the Come in Time mining area. to the majority of the Matakanui-Bendigo Road will be destroyed, along with portions of the Come in Time and Rise and Shine water races, the Come in Time battery, and associated gold working sites.

Overall, the proposal will have severe adverse effects on archaeological and historic heritage values. The Bendigo landscape is widely recognised as one of the most intact historic gold mining landscapes in Central Otago; the extensive mining remains demonstrate both the history of gold mining and the development of mining technology in the region. The proposed works will result in the destruction of the most significant archaeological features within this landscape, namely the Rise and Shine Complex and the Come in Time Complex. Archaeological sites that will not be destroyed by this proposal will be greatly diminished in their contextual and amenity values, as they will no longer be part of a complete and well-preserved archaeological landscape. The wider impacts of the works, such as vibration and dust, are also likely to affect the physical condition of sites that are not within the extent of mining operations.

Given the scale of site loss and the importance of the landscape context, the proposal will result in significant adverse effects on archaeological and broader historic heritage values, for which this landscape was listed as a Historic Area and subjected to a Conservation Covenant.

Were options to avoid explored by the applicant?

(Include reference to how protection is increased, or damage reduced, and how we advocated for this. Reference dates and discussions where possible):

As set out in A.14 Section 7- Management and Monitoring of Actual and Potential Environmental Effects- Matakanui Gold Limited recognises that it is not possible to completely avoid all potential environmental effects associated with a mining project of this scale and complexity.

There are two sites within the proposed authority area that will be avoided as they will not be affected by the proposed activities. These are the G41/4 and G41/5.

The following sites will only be partially modified by the proposed activity:

- G41/584
- G41/586
- G41/790
- G41/792
- G41/251
- G41/256
- G41/782

These sites have not been avoided but rather modification of these sites is limited to where they intersect the Project Site.

Furthermore, there are several stone huts and transport sites (G41/271, G41/272, G41/275, G41/587, and G41/603) recorded just outside the western boundary of the authority application. Should an authority be granted, a vibrations assessment will be a condition of the authority to ensure the impact to these sites from the proposed works, including vibration from vehicles, will be understood and appropriately mitigated.

The archaeological sites within the Authority Application Area are all pre-1900 gold mining sites, clustered within areas of historically identified gold deposits. These are the same deposits that the Applicant proposes to mine, thus options for avoidance of these sites are limited without reduction to the proposed mining areas. Any avoidance would likely affect the viability of the Project.

No recommendation has been made in the NZHP Assessment for avoidance of significant archaeological sites.

Proposed Mitigation

The NZHP Assessment sets out the following recommendations for mitigation of the effects of the proposal on the archaeological sites within the Authority Application Area:

- An archaeological authority is sought from Heritage New Zealand Pouhere Taonga.
- G41/4 (Rabbiters Hut) and G41/5 should be fenced off and protected during earth works.
- No earthworks should take place outside of the Authority Application Area.
- The points at which the water races (G584, G41/586, G41/6 and G41/790) enter the Authority Application Area should be identified and marked off using survey pegs to ensure avoidance outside of the Authority Application Area.
- Water races G41/584 and G41/586 will have their full extents digitally mapped.
- The following archaeological sites should be recorded to level II as defined in *AGS1: Investigation and Recording of Buildings and Standing Structures* (HNZPT, 2018):

- The affected sections of the Rise and Shine (G41/584) and Come in Time (G41/586) water races;
- Stones Huts- (G41/265, G41/266, G41/267, G41/273 and G41/606);
- Dam (G41/269); and
- Stone culverts and revetments (G41/589 and G41/782).
- The following archaeological sites should be recorded to level III as defined in *AGS1: Investigation and Recording of Buildings and Standing Structures* (HNZPT, 2018):
 - G41/6 and G41/790 (water races).
- All earthworks that may affect an archaeological site must be monitored by the s45 approved person in accordance with the management plan.
- Site records should be updated within 20WDs of the completion of on-site archaeological work and the final report within 12 months of same.
- The results of the archaeological investigations, including reports, photographic records of the features and sites, and any digital 3D models should be made available to the public via the Cromwell Museum.

A Draft Archaeological Management plan has been submitted as part of the application, if the authority is granted this will require updating to reflect the proposed conditions of the authority.

Further mitigation was discussed at the Workshop with Matakanui Gold

Expectation that an archaeological investigation will take place within the area of Rise and Shine Gold mining, with the potential opportunity for public outreach and engagement with heritage community.

Consideration should be given to assisting the Cromwell Museum with storage and display of materials and information.

Consideration needs to be given to the effects of vibration on the sites outside the Archaeological Authority Area that will be affected by vibrations caused by blasting.

Further considerations have been made in the application to mitigation of heritage matters within CODC for the resource consent and Department of Conservation for the partial revocation of the Bendigo Conservation Covenant and various concessions. These are not matters that can be considered within the conditions of an archaeological authority.

Section 59(1)(a) considerations

In determining an Authority, HNZPTA must have regard to the following³:

- the historical and cultural heritage value of the archaeological site and any other factors justifying the protection of the site:
- the purpose and principles of this Act:

³ HNZPTA, s49(2), s59(1)(a)

- the extent to which protection of the archaeological site prevents or restricts the existing or reasonable future use of the site for any lawful purpose:
- the interests of any person directly affected by the decision of Heritage New Zealand Pouhere Taonga:
- a statutory acknowledgement that relates to the archaeological site or sites concerned:
- the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tūpuna, wāhi tapu, and other taonga.

The historical and cultural heritage value of the archaeological site and any other factors justifying the protection of the site

As outlined throughout this assessment, the archaeological values at Bendigo are unique and justify protection. The intensive landscaping, machinery, and human effort involved in the alluvial mining at Bendigo, and Rise and Shine and Come in Time in particular, has left a landscape of extraordinary historic value that evidences the full span of gold mining history in Bendigo. It is a key archaeological landscape able to provide a tangible and meaningful connection to New Zealand gold mining history for visitors. The proposed works will result in the destruction of the most significant archaeological features within this landscape and destroy the value of an intact and interpretable mining landscape. The significance of the archaeological sites at Bendigo are greatly enhanced by the collective integrity of the mining landscape and the relationships between the individual sites within it. Protecting the sites and their high archaeological values also protects the very high historical and cultural heritage values of the whole area.

This is consistent with the Archaeology Statement included in He Tauākī Kaupapahere Whānui, Statements of General Policy dated October 2025, particularly Policy 2.25: Heritage New Zealand Pouhere Taonga does not support damage to significant archaeological sites, including urupā and pā, other than in exceptional circumstances, including the enhancement or protection of cultural heritage values. The sites within the Project Area certainly meet the criteria of significant archaeological sites.

It is also consistent with Policy 1.14 and 1.31 of the Taiākī Hapahapai, Advocacy Statement included in He Tauākī Kaupapahere Whānui, Statements of General Policy dated October 2025:

- Policy 1.14: Heritage New Zealand Pouhere Taonga recognises and advocates for the conservation of cultural heritage in all its forms, including the historic character of landscapes, townscapes, suburbs, precincts and streetscapes, and the settings that contribute context and meaning to cultural heritage.
- Policy 1.31: Heritage New Zealand Pouhere Taonga opposes the demolition or destruction of significant cultural heritage unless there are exceptional circumstances, including those in which the cultural heritage poses a serious risk to safety and interim protection works would not sufficiently reduce risks.

The purpose and principles of this Act

Purpose of the Act

3. The purpose of the Act is to promote the identification, protection, preservation and conservation of the historical and cultural heritage of New Zealand.
4. The application has led to the **identification** of the historical and cultural heritage of New Zealand as a number of surveys were conducted in the preparation of the NZHP assessment. These have resulted in a number of Site Records being updated within the Project Site and wider Consent Area and new

features recorded. However, a number of sites were also not relocated and further survey and vegetation clearance has been recommended in the NZHP assessment in advance of the earthwork.

5. As set out above the archaeological values within the Authority Application Area are sufficiently high to justify **protection** as contributing sites to both the Bendigo Quartz Mining Historic Area as well as the Bendigo Covenant. The values assessments behind both, point to features, in particular the Rise and Shine workings and the Come in Time workings and Battery as key features contributing to the values of the landscape for which these places are recognised.
6. The nature of these sites, in particular their amenity values and easy public access have resulted in **preservation** and **conservation** efforts of both the Department of Conservation and the Goldfields Heritage Trust. In addition, the specification within the Covenant to ensure continued public access, access to DOC to maintain the Rise and Shine Workings and provision to for the Minister to erect interpretation within the Rise and Shine Workings, demonstrates the preservation and conservation of these sites.
7. The application is **not consistent** with the purpose of the Act.

Principles of the Act

The principles in the Act must be recognised by all persons performing functions and exercising powers under the Act must recognise the principles set out in the Act.

- (a) the principle that historic places have lasting value in their own right and provide evidence of the origins of New Zealand's distinct society;

This principle underlies the intention of the Bendigo Covenant as well as identification of the Bendigo Quartz Mining Landscape. Granting an authority to modify and destroy a number of key features within these identification and protection mechanisms would be at odds with this principle.

- (b) the principle that the identification, protection, preservation, and conservation of New Zealand's historical and cultural heritage should: (i) take account of all relevant cultural values, knowledge, and disciplines; and (ii) take account of material of cultural heritage value and involve the least possible alteration or loss of it; and (iii) safeguard the options of present and future generations; and (iv) be fully researched, documented, and recorded, where culturally appropriate;

- (i) all relevant cultural values, knowledge and disciplines presented in the application have been considered.
- (ii) While the values have been assessed as high, there has been no effort by the applicant to reduce the effects on the significance features of this landscape to result in the least possible alteration or loss. The gold deposits identified for extraction under the current authority application are the same as those historically targeted resulting in the archaeological sites within this landscape. HNZPT has taken account of the unique cultural heritage values and consider that the proposed works do not involve the least possible alteration or loss of it.
- (iii) As set out above, the underlying principle of the Covenant and the Historic Area are to safeguard places of importance for present and future generations. Granting an archaeological authority would not recognise this principle. We consider that the loss of the archaeological sites within the Project Area will greatly diminish the ability of present and future generations to understand and appreciate New Zealand's mining history. Although the applicant has proposed archaeological investigation, digital recording, interpretation initiatives, and funding for heritage projects elsewhere, these measures primarily address the loss of information rather than the preservation of cultural heritage. Recording and digital

documentation cannot replicate the very high heritage values associated with the physical survival of the archaeological sites within their landscape context.

- (iv) HNZPT raised concerns with the NZHP assessment, in particular the methodology used and the assessment of values completed within the assessment. HNZPT worked directly with NZHP as well as the applicant to request further information and set out principal concerns. The assessment was amended to reflect these concerns; version 2 was dated 10 March. However, the continued use of a methodology at odds with that used to assess the values of this landscape and these sites previously (as presented by Hamel and Beauchop) has resulted in an assessment that continues to result in a values assessment that is incompatible with previous assessments of the landscape, in particular those assessments that underlie the Bendigo Conservation Covenant and the Bendigo Quartz Reefs Historic Area.

- (c) the principle that there is value in central government agencies, local authorities, corporations, societies, tangata whenua, and individuals working collaboratively in respect of New Zealand's historical and cultural heritage; and

The proposal affects land subject to the Bendigo Conservation Covenant, managed by the Department of Conservation, which was implemented to preserve the nationally important historical, natural, ecological, and landscape values. In the letter dated 16 of June 2025, the Department of Conservation outlines that they decline to give approval for mineral exploitation activities at Bendigo, due to the major adverse effects on the heritage, landscape, and ecological values protected by the conservation Covenant, including the destruction of significant recorded historic sites identified in Hamel's 1993 assessment undertaken for the Covenant. It states that the application does not demonstrate efforts to avoid these impacts and is inconsistent with the Covenant's objectives. There is value to HNZPT supporting the Department of Conservation's work to protect and maintain the Bendigo Conservation Covenant Area and working with the Department of Conservation to advocate for the high heritage values present at Bendigo.

- (d) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tūpuna, wāhi tapu, and other taonga.

This is considered within the Māori Heritage report below. Otago Rūnanga have a relationship with the Project Area and its waterways, which formed an important mahinga kai crossed by ara tawhito.

The extent to which protection of the archaeological site prevents or restricts the existing or reasonable future use of the site for any lawful purpose

More than 80 archaeological sites are protected under the Conservation Covenant agreed to protect the historic values of the land as referred to in *The rich fields of Bendigo* by Jill Hamel. The Covenant allows for grazing and stock fencing consistent with the conservation objectives, as well as cultivation earthworks that are not in proximity to historic sites.

Protection of the sites does not prevent the existing use of the site, nor does it inhibit practical use of the site. Active management of the Bendigo site currently works alongside the farming activities that take place. The site is, and can continue to be, used for tourist activities. The protection of the sites would restrict future use of the site for mining purposes.

The proposed avoidance of features is limited to G41/4 (Rabbit's Hut) and G41/5 (stockyards). The Rabbit's Hut will be repurposed as a storage or administrative building. It is not apparent that these sites are being avoided due to the consideration of their archaeological or heritage values.

The interests of any person directly affected by the decision of Heritage New Zealand Pouhere Taonga

The Department of Conservation manages the Bendigo Conservation Covenant and as such is considered a directly affected party. HNZPT has had regard to their interests, in considering the historic values of the land as referred to in *The rich fields of Bendigo* by Jill Hamel in its recommended decision.

Landowners are considered a directly affected party. If the authority is granted, their interests will be taken into account by conditioning for their consent to be provided to HNZPT before the authority can be exercised. If the authority is declined, there would be an impact on the landowners because their property would not be able to be used for gold mining activities. This would not prevent the existing use of the properties or other practical uses.

A statutory acknowledgement that relates to the archaeological site or sites concerned

There is no statutory acknowledgement that relates to the archaeological sites in the Project Area. However, both the Mata-au (Clutha River) and Te Wairere (Lake Dunstan) are Statutory Acknowledgement areas. Shepherd's Creek is a tributary of Mata-au; and Rise and Shine Creek joins the Mata-au just above the head of Te Wairere. The Section 18 report provided by the Ministry for the Environment on 11 December 2025 notes "it has become common practice in subsequent Treaty settlements for statutory acknowledgements over waterways to include tributaries. This approach is consistent with the concept in Te Ao Māori of ki uta ki tai (from the mountains to the sea), whereby water is viewed in a holistic way". Consideration of these statutory acknowledgements has been provided within the Māori Heritage Report below.

The relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tūpuna, wāhi tapu, and other taonga

It is acknowledged that Otago Rūnanga have a connection to this ancestral landscape, and that the Project Area is associated with ancestral lands, sites, and other taonga.

Comment on how you have taken the interests of the landowner and applicant into account: section 59(1)(a)(iii) and 46(2)(h)

As above, if the authority is granted, landowner interests will be taken into account by the requirement for landowner consent to be obtained and provided to HNZPT before the commencement of any archaeological works.

The interests of the applicant have been considered through HNZPT's ongoing engagement with Matakānui Gold and their heritage consultants.

If the authority is declined, there would be an impact on the landowners because their property would not be able to be used for gold mining activities, but this has been considered against their ability to continue to use the properties for their existing uses or other practical uses that align with the Bendigo Conservation Covenant.

In taking the applicant's interest into account, it is considered that declining this authority will greatly impact the proposed gold mining Project. While these interests have been considered, it is recommended that the authority be declined on the basis that that the protection of very significant archaeological values should take primacy. The applicant has the option to continue to work with HNZPT and the Department of Conservation to propose a project with significantly less impact on high-value archaeological complexes.

Any other comments

HNZPT has advocated for expanded mitigation measures through correspondence, workshops, and meetings with the applicant and their consultants. While the information requested was not mitigation

itself, the objectives were to provide HNZPT enough information to be able to understand the Project and then mitigate the outcomes of the destruction of many of the sites within Bendigo.

- HNZPT provided written feedback on the heritage assessment on 15 December 2025, requesting the following:
 - Clarification on missing sites (G41/257, G41/270, G41/678).
 - Clarification on ‘Point of Interest’ sites identified in the assessment that were identified as potentially archaeology, but had not been further investigated.
 - Consider and evaluate the potential impacts of impacts of dust, vibration and possible collapse and undermining of sites from underground mining for sites located within 20m of the Project Area.
 - Consider impacts of work on sites located within 20m of the Project Area (sites being: G41/268, G41/271, G41/272, G41/274, G41/275, G41/276, G41/587, G41/671).
 - Improve the assessment of archaeological values by reviewing and updating the values for each site to produce a broader statement of values for the landscape.
- HNZPT attended a workshop on 16 January 2026, during which several migrations were discussed that related to the archaeological authority process (*Notes and Actions of Heritage Workshop*, 16 January 2026). These included:
 - Clarification of the Project Area so that HNZPT could complete their S51 assessment.
 - Assessment of vibration impacts on heritage structures.
 - Undertaking a research investigation prior to excavation of mine pits .
 - Staged reporting during the Project life depending on the strategy of research excavation used.

These discussions have produced updated iterations of the report that have clarified the missing sites and why points of interest were not included. A memo has been produced *Blasting Vibration – Effects on heritage structures* by Marshall Day Acoustics that outlines plans to measure vibration including Dilapidation surveys, test blasts, and blast design optimisation to help mitigate risk. There has been no follow up information provided about the impacts of dust or sites being undermined by underground mining. In addition there has not been an update to include the impacts of the proposed works to any sites within the surrounding areas.

The applicant states that a number of sites will be retained, which are considered to represent an appropriate sample of the archaeological sites present within the Project Area. These include the Eureka Mine complex, including a mine, battery, and water race (G41/252); the Alta battery, adit, and return wheel (G41/253); a forge (G41/254); a stacked schist chimney and three mine shafts (G41/255); a track with a revetted culvert (G41/590); and a dam (G41/671). The Rabbiter’s hut and stock yards (G41/4 and G41/5) will also be retained.

The assessment also states that a significant double-layered dam will be retained. However, there is some confusion within the assessment regarding this and follow up discussions with Naomi Woods has confirmed that the dam proposed to be retained (G41/235) is another site located 2km outside of the Project Area (refer email correspondence between HNZPT and Woods dated 16 January, 19 January, and 10 March 2026). This site was last visited by Neville Ritchie in 1980 and has no clear link to any of the sites located within the Project Area. The assessment states that “...an impressive and unique double layer stone

dam with associated dam-keeper's hut (G41/240 and G41/241)..." will be retained (Woods 2025, p. 167). This is site G41/269 which is to be destroyed and was included in the previous authority for the area to be destroyed (2025/574). This has not been clarified in the assessment or subsequent discussions.

Based on the information provided, there have been limited attempts to reduce or explore options to avoid. The retention of some sites as a "representative sample" does not consider that the value of most of these sites comes from the intactness of the entire landscape, which reflects nearly 90 years of mining activity and associated land use. In addition, there remains confusion within the assessment about some of the significant sites to be retained (e.g. G41/269) that has not yet been cleared up. The sites' high values cannot be understood or retained by preserving a small number of sites disconnected from a wider archaeological mining landscape.

HNZPT provided written feedback on the heritage assessment on 17 December 2025, identifying areas where further information was required, including clarification of site locations and explanation for the exclusion of sites located near the Project boundary.

Matakanui Gold facilitated a workshop on 16 January 2026, which was attended by HNZPT staff. During this workshop, HNZPT provided feedback on the heritage assessment and discussed potential mitigation options. A follow-up meeting on 19 January 2026 was subsequently held with NZHP staff to discuss revisions to the assessment.

Matakanui Gold were included in correspondence relating to these discussions and were aware of the feedback provided to their consultants.

Archaeologist's summary of archaeological aspects:

(a) application is not capable of being granted,

Recommend that authority be declined.

Emma Clifford, Manager Archaeology

Date: 25/03/26

Victoria Trow, Archaeologist

Date: 25/03/26

References

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Carpenter, Lloyd (2013b). Finding "Te Wherro" in Ōtākou Māori and the Early Days of the Otago gold rush. *Mai Tai: Journal* Volume 2, Issue 2.

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