



Memorandum

To: Bendigo-Ophir Gold Project Panel

From: Santana Minerals

Date: 14 September 2026

Re: RFI 9 Response to Statements Concerning Ardgour Rise and Thomson Gorge Road Replacement

The statements of Mr Martineau and Mr Kennett are primarily directed at information provided by Matakanui Gold Limited in response to Request for Information (RFI 9) and assess the proposed Ardgour Rise alignment as it existed at that time. Both statements raise concerns regarding road gradients, safety, route characteristics, sustainability, recreational values and whether Ardgour Rise would provide an appropriate replacement for Thomson Gorge Road.

Since the RFI 9 response was lodged on 12 June 2026, the proposed Ardgour Rise alignment has undergone substantial refinement through the RFI 11 process following ongoing engagement with Central Otago District Council (CODC). This process resulted in the Stantec *Ardgour Rise Road Safety Review* which sets out the amended alignment and associated engineering, road safety aspects of Ardgour Rise, along with the landscape, heritage and ecological assessments now before the Panel. The refinement process was undertaken in response to concerns identified through design review and consultation and sought to improve the operational performance, safety and functionality of the replacement road. Many of the concerns raised by Mr Martineau and Mr Kennett relate to earlier iterations of the alignment and should be considered in the context of the revised design and supporting technical assessments.

The revised alignment (Rev 5) was subsequently assessed in the Stantec *Ardgour Rise Road Safety Review*. The review concludes that the Rev 5 alignment eliminates the extended steep grades present in earlier design iterations, results in a lower proportion of steeper grades than Thomson Gorge Road and is generally consistent with Australian Road Research Board guidance for remote rural mountainous roads. Stantec also concludes that the alignment can be progressed, subject to detailed design measures such as localised widening, passing opportunities, edge protection, signage, drainage controls and an appropriate maintenance regime. These matters are appropriately addressed through the detailed design process and will continue to inform the ongoing development of the alignment.

As a result of this refinement process, the revised alignment incorporates a range of contemporary road design features intended to improve safety, resilience and overall road performance while reflecting the terrain and operating environment.

Both statements question whether Ardgour Rise provides a like-for-like replacement for Thomson Gorge Road. While there are differences between the two routes, a replacement road does not need to replicate the existing road's exact topography, gradient profile, alignment, elevation or recreational experience. Rather, the relevant consideration is whether the replacement route maintains public access and achieves the intended access and transportation outcomes of the existing road.

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The assessment should therefore focus on whether the replacement road appropriately maintains public access while achieving suitable access, functionality and safety outcomes, rather than whether it reproduces all characteristics of the existing route.

Mr Kennett also raises concerns regarding user experience and recreational values. While some aspects of the travel and recreation experience will inevitably differ from the existing road, the revised alignment maintains public access through the area and continues to provide for recreational use. The design process has sought to balance engineering, safety, environmental and landscape considerations while maintaining the public access function currently provided by Thomson Gorge Road.

Accordingly, the concerns raised by Mr Martineau and Mr Kennett are largely directed at superseded stages of the Ardgour Rise design process. The *Stantec Ardgour Rise Road Safety Review* (which sets out the amended alignment for Ardgour Rise) and supporting technical assessments submitted through the RFI 11 process provide the most appropriate basis for evaluating the road's safety, functionality and public access outcomes. Those assessments demonstrate that the revised alignment is capable of safely and effectively maintaining public access while providing a suitable and practicable replacement for Thomson Gorge Road.