

Bendigo-Ophir Gold Project - Impact upon the cycling network experience.



photos: Kat Bulk

<https://www.trailhub.co.nz/inspiration/hawksburn-thomsons-gorge-gravel-bike-double/>

Statement of Jonathan Kennett

29 March 2026

Qualifications and Experience

I am a cycling author and project manager. I have consulted and worked for councils, NZTA, Recreation Aotearoa and MBIE, across New Zealand in the area of cycling, primarily designing and project managing the New Zealand Cycle Trail network and mountain bike trails. I have helped establish the Tour Aotearoa, Sounds to Sounds and Kopiko brevet¹ as well as the longest running mountain bike race in NZ, the Karapoti Classic. I have also written over 20 cycling books (guidebooks and history books) and countless reports, most notably co-authoring the [New Zealand Cycle Trail Design Guide, and the New Zealand Mountain Bike Trail Builders Handbook](#).

My academic qualifications are a Bachelor of Science majoring in ecology.

Code of conduct for expert witnesses

I have read the Code of Conduct for Expert Witnesses in Part 9 of the Environment Court Practice Note 2023, and I have complied with it in preparing this statement.

Otago and the National Cycle Network

Aotearoa's fast-growing national cycle network *Ngā Haerenga, The New Zealand Cycle Trails*, has exceeded expectations. The recreational and economic impact is of national significance, with total expenditure from the Great Rides alone surging from an estimated \$950 million in 2021 to more than \$1.25 billion in 2025 (<https://www.nzcycletrail.com/assets/evaluation-2025/2025-NZCT-Evaluation-Report-14-November-2025.pdf>). Aotearoa New Zealand has become a renowned international tourism destination for cycle touring / bikepacking with 'epic' long-distance routes such as the 3,000 km Tour Aotearoa and 1,500 km Sounds to Sounds attracting riders from New Zealand and overseas throughout the year, as well as for the organised annual brevet events.

The Otago region has many routes that are part of *Ngā Haerenga* with a cycle network that connects five Great Rides (the Otago Central Rail Trail, Lake Dunstan Trail, Queenstown Trails, Clutha Gold Trail and Roxburgh Gorge Trail) and over 30 communities. It is estimated that the network has significantly stimulated the regional economy with Otago cycle trails.

¹ "brevet" a colloquial expression for organised multi day cycle ride/route

The economic benefits of the pioneering Otago Rail Trail (opened 2000) are widely known²(11,900 visitors, \$25.9 million current spend attributable to visitors). Building on that success, the recently completed Lake Dunstan Trail (2021) has been performing far above projections (business case predicted 8,000, actual 71,600 pa in 2025³). The network continues to grow, with new connections, and new route opportunities. The much-anticipated Kawarau Gorge Trail will open in 2026 and will connect the popular Queenstown Trails with the Lake Dunstan Trail, the Otago Central Rail Trail, and Thomsons Gorge. In 2027, another critical trail will open, the trail from Wanaka to Cromwell, and the rest of the Great Rides in Otago. At that stage, usage on the Thomsons Gorge route is predicted to greatly increase as it will create a logical loop for visitors to the Otago region.

Thomsons Gorge

Thomsons Gorge Road is one of only a few routes over the Dunstan Mountains that separate the upper Clutha Valley from the Otago Central Rail Trail. It is an iconic backcountry road and is acknowledged as a regionally significant route for 'backcountry' (large scale natural settings) walking, cycling, horse riding, and 4WDing. Thomson Gorge Road provides access to Ardgour and Bendigo Conservation areas and Bendigo Historic Reserve with Come in Time Battery. It has long been promoted as a mountain bike route and is included within Tourism Central Otago's list of promoted trails⁴.

The track is a recognised 40km cycle touring 'adventure ride' over the Dunstan Range. With a mix of gravel and sealed surfaces it has moderate climbs, fast descents and multiple stream crossings. The track passes through natural landscapes and offers extensive views of the Upper Clutha Valley and Southern Alps. It is a moderately challenging route through the high country. Graded 3-4. The track is ridden as part of larger loops such as the Hawksburn / Thomson Gorge Double, or the Thomson Gorge / Lake Dunstan Double which also uses sections of the Otago Rail Trail.

Thomson Gorge Road is, for example, highly rated by Brian Farrant, owner of NZ Bicycle Tours and member of the Tourism Industry Association NZ. Brian considers it to be even better than the Lake Dunstan Trail and takes tourists from around the world on this quiet and scenic route⁵.

² <https://www.otagocentralrailtrail.co.nz/assets/Reports-Surveys-etc/Economic-impacts-of-a-Taieri-Gorge-extension-to-the-Otago-Central-Rail-Trail.pdf>

³ Assessing the Impacts of a New Cycle Trail: A Fieldnote - NZAIA - NZ Association of Impact Assessment.

⁴ <https://www.centralotagonz.com/tracks-and-trails/mountain-bike-trails/listing/thomsons-gorge/>

⁵ Brian Farrant pers. comm., 12th March 2026

The track is mapped on NZTA's New Zealand Cycling Network as a Cycle Touring / Bikepacking Route, in the same category as the nearby Danseys Pass and Omarama Saddle routes. (Omarama Saddle is incorporated within the increasingly popular Sounds to Sounds long distance bikepacking route that traverses the length of the South Island). The reason for its importance is not only its strategic network value, but also that it has virtually no traffic on it (12 vehicles a day on average).

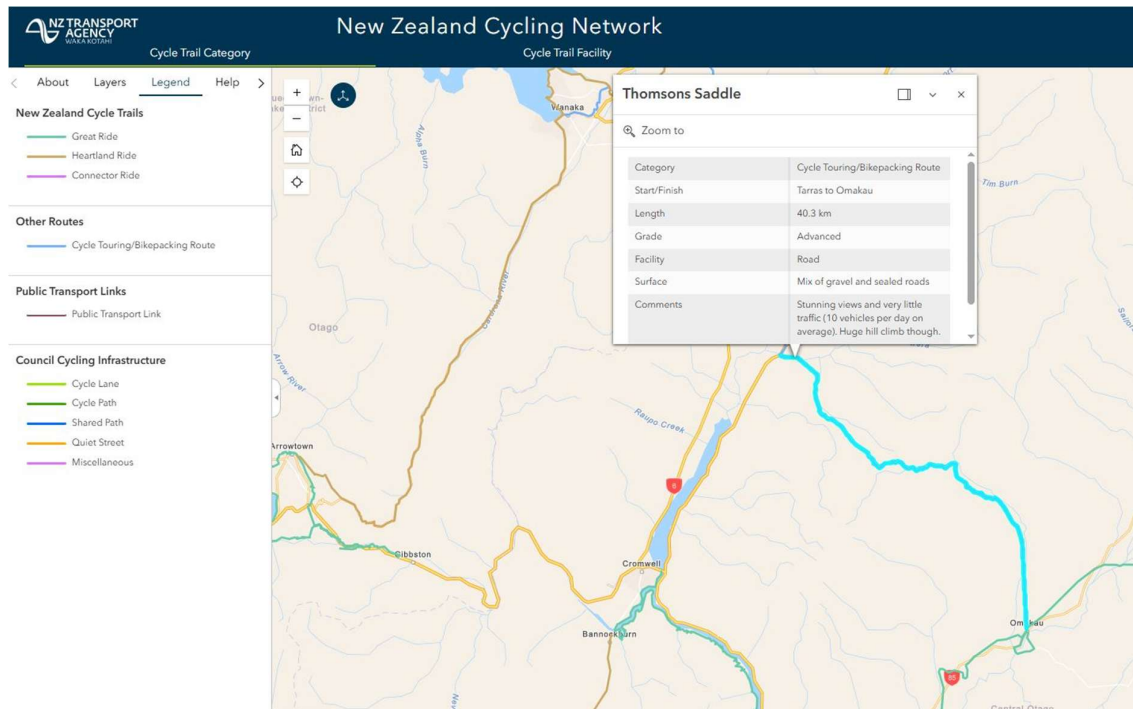


Figure 1: excerpt from NZ Cycling Network ⁶

Thomson Gorge Road forms part of the route of the Great Southern Brevet, a long-standing cycling event (200 riders 2025) described as “...possibly the most stunning and inspirational 1100km ride you can find on our little planet. Many would describe it as a life-changing experience...” - Bikepacking.com

Thomson Gorge Road is a key component of the regional adventure cycling network, and forms part of the contiguous national cycle network.

Comparison of Thomson Gorge Road and Ardgour Rise

12 km of Thomson Gorge Road would be relocated to a ridge referred to as the Ardgour Rise alignment.

⁶ Source: <https://www.nzta.govt.nz/walking-cycling-and-public-transport/cycling/cycling-in-new-zealand/cycle-touring#map>

Ardgour Rise is considerably steeper than Thomson Gorge Road, with an estimated 3.25km being over approximately 10 degrees. This would mean that the trail would fall beyond Grade 5 (Expert)⁷ and would, therefore, not be rideable for the majority of mountain bikers. Such steep gradients would also mean that the trail surface would be subject to steady and sustained erosion from rain and skidding tyres. The surface would almost certainly require considerable maintenance to avoid becoming rutted.

On the existing Thomson Gorge Road, however, only 0.25km of the trail is over 10 degrees, and the majority of the road is under 7 degrees, making it much more accessible and sustainable than the proposed Ardgour Rise.

The Santana Recreation Assessment⁸ refers to “the potential for an inferior experience for cyclists” and attempts to dismiss this by saying that the final formation of the road would have to meet CODC’s ‘satisfaction’. It is impossible to know what their ‘satisfaction’ might be, and in any case, it would not be possible to build to a suitable gradient on the Ardgour Rise ridge, as the current topography is too steep.

⁷ <https://www.mbie.govt.nz/assets/new-zealand-cycle-trail-design-guide.pdf>,

⁸ https://www.fasttrack.govt.nz/__data/assets/pdf_file/0013/15511/B.39-Rob-Greenaway-and-Associates-Recreation-Assessment-Greenway-2025_Redacted.pdf

Table 1: Comparison of gradient: Thomson Gorge Road and Ardgour Rise				
Gradient	Thomson Gorge Road		Ardgour Rise	
	Distance (m)	Percent	Distance (m)	Percent
<5%	5808	49	4584	34
5 to 10%	3360	28	3155	24
10 to 12.5%	1409	12	775	6
12.5 to 16.7%	1128	9	1546	12
16.7 to 20%	242	2	1380	10
20 to 25%	20	0	1764	13
>25%	0	0	112	1
Totals	11,967 m	100%	13,316 m	100%

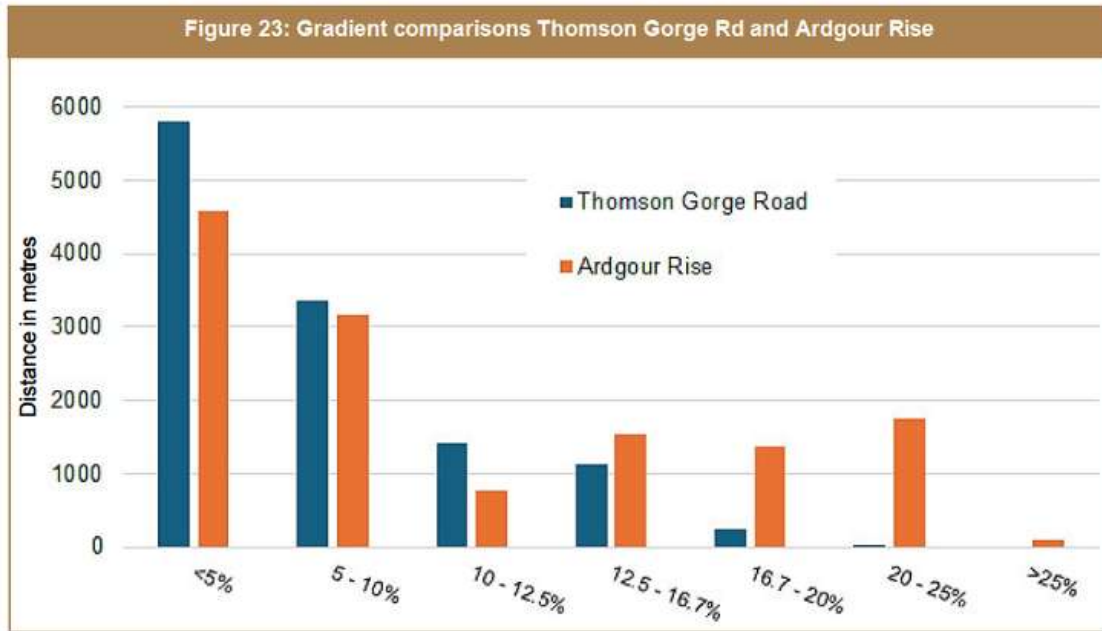


Figure 2: proposed Ardgour Rise gradients⁹

Mine proposal

Santana Minerals' proposed Bendigo-Ophir Gold Project will forever alter the character of Thomson Gorge Road. Mining activities will result in the closure of a 12km western section of Thomson Gorge Road to allow for extensive operational activities. The closure is proposed to be mitigated by upgrading a section of the route to the north that will generally follow the existing 4WD track of Ardgour Rise and run alongside the mine site. I note the need for the alternative to open before further

⁹ Table 1, p31 Recreation Assessment (ibid)

major activity due to the potential risk of collisions between cyclists and construction traffic.

This alternate route currently has significantly steeper gradients and does not provide a like-for-like recreational experience. If not rerouted and regraded (as proposed) Ardgour Rise will be much more challenging to ride. Experience of the historic landscape will be lost as there will be no access to the open landscape and historic features such as the stamping battery. The overall landscape experience will no longer be backcountry, but industrial in character, with the visual disruption, dust, and noise of an active mining site.

“The long, delicious climb up Thomsons Gorge Road” will be lost for the duration of mining operations (envisaged to be 20 years), and when it is reopened after mining ceases, the track will offer a radically different experience as both the track and the landscape through which it passes will have been dramatically altered.

While the rehabilitation plan includes re-establishing walking, cycling, and equestrian trails, the Thomsons Gorge route as we know it will no longer exist. There will be temporary closures and disruption during construction, and a permanent and ongoing change in character of the relocated route through an active, open cast mining landscape.

Conclusion

The proposal to close a section of Thomson Gorge Road and open up a new route to the north alongside the active open-cast mine will dramatically alter the recreational experience for the worse.

Cycling is recognised by Rob Greenway as being of High recreational value, but in the Recreational Assessment, he considers the mine proposal to generate only Minor effects on this activity.

I disagree and consider the effects to be Moderate.

While a connecting route across the Dunstons will remain, the user experience will be drastically altered, if able to be managed at all. The landscape qualities of openness and naturalness will be lost.

These effects may disrupt the reputation and momentum of the growing Otago cycle network.

If the mine is to proceed then a strict condition must be that the Ardgour Rise alternative route is;

- a) open prior to further mining activity on Thomsons Gorge Road, to reduce the risk of users and construction traffic interface, and
- b) redesigned using the cycle trail design guidelines (for Grade 4, Advanced) and approved in detail after consultation with user groups.

Jonathan Kennett