

MEMO

Project:	Waihi North FTA	Document No.:	Mm 004 R03		
To:	Mitchell Daysh	Date:	1 September 2025		
Attention:	John Kyle	Cross Reference:			
Delivery:	Email	Project No.:	20240606		
From:	Gary Walton, Laurel Smith	No. Pages:	7	Attachments:	2
Subject:	Initial responses to FTA Invited Comments				

We have reviewed the *Acoustic Review* undertaken by Styles Group Ltd (**SGL**) on behalf of Hauraki District Council (dated 20 August 2025). We provide the following responses from our initial review, which we have based on the summary points in the SGL review.

Styles Summary Points	MDA Initial Response
1) The MDA Report contains a significant amount of information and assessment. I have focussed on recording agreement on important topics and recording disagreement with some specific issues.	None required.
2) I agree with the MDA Report that construction work should be separated from the operational noise sources and that a different set of noise limits and management controls should apply to each. I consider that the long duration of noise from construction work in many areas has the potential to generate a considerable effect on receivers.	<p>Likely none required.</p> <p>SGL has suggested (Section 4.1.1, pg. 124) that our report 'is not explicit' on the distinction between construction and operation activities.</p> <p>Section 2.4 (pg 7) and Table 6 (Section 5.1, pg 20) of our report outlines specific activities that are to be assessed as construction noise. This is consistent with the approach taken in NZS 6803.</p> <p>These activities are reflected at length in Condition 6 (although the list in our report was never intended to be taken as exhaustive).</p>
3) The MDA Report recommends that the noise limits for 'long term' duration works as set out in NZS6803:1999 are adopted as a limit for day-to-day construction works, and as a 'trigger' for additional assessment and careful management when they cannot be complied with using practicable mitigation. I agree with this proposal.	None required.

Styles Summary Points	MDA Initial Response									
4) The MDA Report and the proposed conditions treat the long-term construction noise limits from NZS6803:1999 as a notional limit that must be complied with unless a certified CNMP authorises an infringement. I consider that this arrangement is quite common and is generally acceptable. However, the conditions and CNMP requirements that control this process need to be robust, as the conditions themselves would no longer impose any upper limit on construction noise. My experience is that this relies on OGNZL and the HDC applying a considerable degree of rigour to the determination of the BPO and the certification process. This is especially important for situations where the limits applying at night or on Sundays are proposed to be infringed. I have recommended amendments to proposed conditions 23, 24 and 25 to deliver this.	<p>SGL’s reference to Conditions 23-25 does not appear to be the correct numbers as they do not address construction noise.</p> <p>Accept SGL’s proposed changes to Condition 8. I consider the new wording is no different to the intent of the original wording. If the panel or others consider that the changes add clarity then this is acceptable.</p>									
5) Overall, I consider that the approach to setting noise limits for construction works is generally appropriate.	None required.									
6) I consider that the assessments of noise effects provided are likely to be reasonable and accurate for much of the time, but there will be considerable periods of time in calm meteorological conditions where the noise from the Project will be more prominent or dominant than what is described in the MDA Report. I consider that the noise from the Project is likely to adversely affect the character and amenity of the quieter rural areas, particularly around the Willows SFA and similar presently quiet areas that are close to major parts of the Project.	<p>SGL discuss some uncertainty but this does not seem to alter their conclusions, noting that the noise levels will comply with reasonable limits.</p> <p>Broadly, we note that SGL (at 5.2) accepts the basis of the modelling and accepts that the models are just indicative and that there will be some variation in practice.</p> <p>However, the same is also true of the ambient noise data, as SGL acknowledge that the background noise level is also variable. It is appropriate to consider the 'single averaged figures' on a like-for-like basis to give an overall indication of the effects when considered on a long-term basis. Whether a source is simply audible is not an adverse effect per se.</p>									
7) OGNZL are proposing that the noise from all operational activities is managed to comply with specific noise limits that are lower than some of the predicted levels. The MDA Report states that some specific mitigation measures will be required to achieve compliance with OGNZLs proposed noise limits. I agree that these noise limits are appropriate to apply to the Project.	<p>SGL has recommended modifying Condition 16 as follows and we agree with these amendments:</p> <p><i>The noise rating level from operational activities authorised by this consent <u>assessed cumulatively</u> must not exceed the limits specified below when measured at or within the boundary of any residentially zoned site or the notional boundary of any occupied dwelling in the Rural Zone:</i></p> <table><tr><td>0700 - 2200</td><td>Monday to Saturday</td><td>50 dB LAeq</td></tr><tr><td></td><td>All other times</td><td>40 dB LAeq</td></tr><tr><td>2200 – 0700 (the following day)</td><td>Every day</td><td>70 dB LAfmax</td></tr></table>	0700 - 2200	Monday to Saturday	50 dB LAeq		All other times	40 dB LAeq	2200 – 0700 (the following day)	Every day	70 dB LAfmax
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Styles Summary Points	MDA Initial Response
8) I agree with the MDA Report that compliance with the proposed operational noise limits needs to be demonstrated in an Operational Noise Management Plan prior to operations commencing.	None required.
9) I consider that it would be helpful for the applicant or MDA to clarify that the Martha operations are indeed the only other part of OGNZLs operation in Waihi that has the potential to generate noise effects that might appreciably 'add' to the noise effects of the Project. Or if not, to provide details of other parts of the OGNZL operation that could cause a cumulative noise effect with the Project and to assess that. In the absence of such an assessment or clarification, I consider that the proposed noise limits will be capable of managing any potential cumulative effects so that the cumulative noise level would only be 1-2dB above either the proposed noise limit in condition 16 of the noise limits permitted by other consents or District Plan rules.	<p>While some uncertainty is discussed, this does not seem to substantively alter SGL's overall conclusions. We agree that, although any cumulative exceedance is unlikely, should this occur then the potential cumulative noise level from both project and non-project activities would be no more than 1-2 dB above the project's proposed operational noise limits. Therefore, the potential cumulative effects will be appropriately managed by the proposed consent conditions.</p> <p>We have considered all of the noise sources that we understand could cause an appreciable cumulative noise effect. The worst-case activities, such as use of the processing plant, effectively already apply on a cumulative basis as it will be used to process both 'project' and 'non-project' material.</p> <p>Our report describes how WNP activities are dependent on existing infrastructure that has been included in the calculations. While this is broadly described as 'Martha operations', this includes use of the processing and tailings facilities.</p>
10) I have reviewed the calculation methods, modelling inputs and assumptions that are described in the MDA Report. I agree that the use of the SoundPlan software, assumptions in respect of meteorological conditions and general calculation methods are appropriate. I have reviewed the tables of sound power level data and I consider that the data used appears to be reasonable and consistent with measurements and assessments we have undertaken on other projects.	None required.
11) I consider that the noise models produced in the MDA Report are helpful to understand the general nature of noise effects for the different phases of the Project. However, I consider it is critical to understand that for any given scenario, the noise levels will be quieter than what has been modelled for an appreciable period of time, and there will also be times when the noise levels could be much higher than what has been modelled. This comment does not require any action from the applicant. Rather, it is intended to inform the decision-makers.	None required (refer response to point #6).

Styles Summary Points	MDA Initial Response
<p>12) I consider that the conditions relating to helicopter noise require some further consideration. I consider that the MDA Report and proposed conditions are not clear how the noise from helicopters used during construction and operational phases will be managed with certainty, and what the cumulative effects with other Project noise sources will be. I have recommended new conditions for managing helicopter noise to address this.</p>	<p>We agree with the SGL recommendation to apply the noise limits from NZS 6807 to helicopter movements. Condition 20 should be replaced by the proposed Condition 23A except for the specific requirements relating to 111 and 122 Willows Road for reasons explained by Mitchell Daysh. The NZS 6807 noise limits will control the frequency of helicopter movements allowed over a 7 day period and on any single day.</p> <p>We agree with the SGL recommendation to require a Helicopter Noise Management Plan. Details such as flight paths and movement numbers can be set out in the HNMP. We agree with the proposed condition 25A relating to the HNMP with some edits which are attached to this memo. Condition 25A iv may not be practicable operationally.</p> <p>We also note that the conditions are not clear about which noise limits apply to helicopters hovering and helicopters taking off/landing. We recommend the addition of advice notes as follows:</p> <p><i>Condition 7</i></p> <p><i>Advice Note: Noise from helicopters hovering as part of construction activities is subject to this condition. Noise from helicopters taking-off and landing at defined helipads is controlled by condition 20.</i></p> <p><i>Condition 16</i></p> <p><i>Advice Note: Noise from helicopters hovering as part of operational activities is subject to this condition. Noise from helicopters taking-off and landing at defined helipads is controlled by condition 20.</i></p>
<p>13) Based on the assessment information available in the MDA Report, I expect that helicopter and plant noise could be a regular and prominent feature in parts of the Forest Park. I expect that helicopter noise will be loud and dominant for short periods when overhead or landing / departing nearby, and that for much longer periods the helicopters will be audible / present at lower levels. These effects are only relevant when there are people in the Forest Park to observe the noise.</p> <p>I have considered whether there are possible mitigation measures that could reduce the effects of Forest Park users – in particular walkers of the Wharekurauponga track. I consider that an addition to the ONMP to require consideration of plant noise and a specific Helicopter Noise Management Plan could be appropriate for determining the mitigation methods and how and when they are applied to minimise the noise effects. I consider that the effectiveness of such a management plan approach can only be known when OGNZL are able to consider the practicability of minimising the effects.</p>	<p>None required.</p>

Styles Summary Points	MDA Initial Response
14) I consider that the noise levels arising from traffic increases on Willows Road need to be managed to ensure they reasonable when assessed cumulatively with operational noise and helicopter noise at the Willows SFA. I have recommended an addition to proposed condition 16 to set specific noise limits for this source at the closest receivers on Willows Road.	We understand that consideration of SGL's proposed condition is no longer required, as described by Mitchell Daysh.
15) I have a number of concerns with the acoustic assessment used to inform the ecological assessment. However I understand that the ecologists are not relying heavily on the accuracy of the relevant parts of the MDA Report. This means that these sections of the MDA Report can remain and be used as a general indication of the type and extent of effects that may arise on birds.	None required.

Amendments to Helicopter Noise Conditions

Condition 20 (Replace this condition with Styles proposed condition 23A with edits)

Proposed Condition 23A (Use this condition with the following edits to replace Condition 20)

The consent holder must ensure that the noise from helicopter movements does not exceed the following noise limits when measured and assessed at the notional boundary of any dwelling:

50dB Ldn when assessed as the rolling average over any 7-day period

53dB Ldn on any single day

70dB LAFmax between 10pm and 7am the following day

~~Except that the noise from helicopter movements must be at least 5dB below these LDN levels when measured and assessed at the notional boundary of 111 and 122 Willows Road.~~ The measurement and assessment of helicopter noise must be undertaken in accordance with NZS 6807:1994 Noise management and land use planning for helicopter landing areas.

Advice Note: A helicopter movement is any departure from or arrival at a helipad.

Proposed Condition 25A (Agree with the following edits)

The Consent Holder must provide a Helicopter Noise Management Plan for certification under Condition C5 of Schedule One. The Helicopter Noise Management Plan applies to the use of helicopters for construction and operational use. Certification is required to verify that the Helicopter Noise Management Plan:

- a. Includes actions, methods, monitoring programmes and trigger levels as appropriate to meet the objectives in this condition; and
- b. To ensure that helicopter noise meets the noise limits in condition ~~23~~20.

The objectives of the Helicopter Noise Management Plan are to ensure:

- a. Compliance with Condition ~~23~~20 of this consent; and
- b. That noise from all helicopter use authorised by this consent is minimised in accordance with the requirements of Section 16 of the Resource Management Act 1991 and adopts the BPO to ensure the emission of noise from the activities does not exceed a reasonable level.

The ~~Operational Helicopter~~ Noise Management Plan must as a minimum, address the following matters:

- i. Defined approach and departure tracks from each formal landing area to minimise noise effects for receivers near to all landing areas;
- ii. Preferred flight paths, flight procedures and any minimum altitude requirements for regular helicopter movements to minimise noise to all receivers under the flight paths;
- iii. Procedures to ensure that idling time on the ground is kept to a minimum
- ~~iv. Procedures to ensure that helicopters must not fly, land or hover within 400m of the Wharekirauponga track when the track is open between 1 December and 28 February (inclusive).~~
- v. Methods and procedures to record flight numbers and track movements and helicopter types to ensure that compliance with the noise limits in condition ~~23~~ 20 can be robustly determined on a daily basis.
- vi. ~~In addition to iv, the~~ Methods and procedures that will be adopted to minimise noise effects for users of the Coromandel Forest Park. This may include specified flight, approach and departure

tracks to avoid or minimise noise effects in sensitive areas, limiting helicopter use entirely over the peak park usage periods, timing helicopter movements to avoid or minimise conflict with park users or any other methods that may be practicable and effective.

- vii. Methods and procedures to ensure that all pilots are aware of the requirements of all conditions relating to helicopter activity, including the noise limits, the need to minimise noise as far as practicable and the need to comply with the certified ~~ONMP~~ HNMP.