

23 June 2026

Ann Rodgers
Central Otago District Council
1 Dunorling Street
Alexandra 9320

Attention: Ann Rodgers

TRANSMITTAL: Email



Dear Ann

Bendigo Ophir Gold Project - Outstanding Transportation Matters

You have asked us to outline our outstanding concerns with respect to the above Fast Track Resource Consent Application. There are two outstanding transport concerns:

1. Ardgour Rise Design and RFI Response
2. Ardgour Road carriageway width

In addition, there are other points of difference in the JWS, but we consider these are comparatively less significant. That notwithstanding, we have included a list of these items for completeness in Section 1.3. of this letter.

1.1 Issue 1 – Ardgour Rise Design and RFI Response

Following review of the JWS, the EPA sought the following information.

Following receipt of the Traffic / Roads Joint Witness Statement (JWS) and the Recreation JWS dated 15 May 2026 and 27 May 2026, at the direction of the Panel, the EPA is seeking the following information:

- 1 It is clear to the Panel that there are challenges with the proposed design and alignment, and compliance with the proposed condition. While the Panel appreciates that the proposed condition provides for further design work, the road is proposed now does not meet the "like with like" replacement of Thomson Gorge Road, changes to its design may have flow on implications and it appears that there may be difficulties achieving the condition at all. The Panel considers it appropriate and requests that further design work is undertaken now and provided to the Panel to provide greater certainty that the a "like-to-like" replacement can be provided and the proposed condition can be complied with.

MGL produced a response to this RFI dated 12 June 2026. The Ardgour Rise Design (May 2026) supplied appears to be unchanged from the previous revision G alignment published in November

2025. The corresponding breakdown of gradients of over 12.5% included in the 12 June 2026 memorandum is also very similar to that produced by Meyer Cruden in their August 2025 memo based the June 2025 design and subsequent assessments.

Meyer Cruden's main concern was a 6.7km long section with an average grade of 13.2% including three relatively long sections of over 16.7% grade. These are shown in the below graphic produced by Meyer Cruden. We can confirm that these sections will not meet either Council's engineering standards or the ARBB unsealed road guide recommended by Abley, and it has not been demonstrated that the Ardgor Rise route can be engineered with suitable gradients.



The Landpro memo included as Attachment C to the RFI response show a marked reduction in the length of the corridor with grades of over 16.7% however we are unable to see how this has been achieved given the two-dimensional alignment appears to be unchanged. No long-section with gradients has been provided (that is to update/replace the above one) to confirm that this has been addressed through additional cut and fill.

In conclusion there is no additional information provided in response to the RFI to demonstrate that the concerns raised in our review have been addressed or that they meet applicable engineering standards.

On page 2 of the RFI response it is stated that a condition in an updated condition set (to be provided to the panel on 22nd June 2026) will include the design standards requested by Council. The wording of this proposed condition has not been included in the RFI response so we are unable to comment on this aspect.

We further highlight that our advice to Council on this matter is that a "like-for-like" replacement of Thomson Gorge Road is not appropriate especially noting the more challenging terrain proposed by the applicant for the replacement Ardgor Rise route. Therefore, the design standard should meet appropriate engineering standards.

1.2 Issue 2 – Ardgor Road carriageway width

There has been extensive discussion relating to the adequacy of the existing Ardgor Road carriageway in the context of additional traffic generated by the proposal. Further detail on this matter is available in the JWS.

In summary, it is our opinion that the Ardgor Road seal width is insufficient, and this will lead to adverse safety effects as two trucks cannot pass (and a truck and car cannot pass comfortably) without dropping off the available sealed width. This is an existing issue but it is exacerbated by at least a doubling of traffic volume and tenfold increase of conflicts involving a truck.

The increased use is expected to increase the extent of pavement damage (primarily edge break due to the reduced width and increased incidence of heavy vehicle passing). This will require additional maintenance which if not addressed in a timely fashion will cause safety concerns as vehicles swerve to avoid damaged pavement.

The applicant suggests a Developer Agreement between the applicant and CODC would be an appropriate mechanism to address the above matters, whereby the applicant would make a “fair contribution” to the upgrade of Ardgour Road at the time of rehabilitation. To our knowledge, no such agreement currently exists.

This remains a point of difference between Council and the applicant.

1.3 Issue 3 – Other outstanding issues

Other matters include:

- SH8 / Ardgour Road intersection and Thomson Gorge Road upgrade timing, refer D.01 CODC Conditions 43-47, and new D.01 Conditions 4-6, none of which reference construction timing at all. The JWS records that all experts agreed that the upgrade should be commenced as soon as practicable, ideally prior to mine construction, and a timing mechanism needs to be satisfactorily captured in the condition set. We have not yet seen an updated condition set that reflects this.
- Required amendments to D.01 CODC Conditions 50-52 (refer Para 42-49 of the JWS) in relation to staff bus transport, school bus safety, and use of Matilda Rise and Thomson Gorge Road south of Ardgour Rise by exception only.
- Come in Time Battery re routed access will be much longer and more challenging which is likely to impact on some visitors being able to visit the Battery. We understand this is addressed in recreation evidence and we are not aware of any updates to this aspect since the JWS was issued.

We trust this satisfactorily addresses your immediate needs, however, please do not hesitate to contact us should you require further information.

Regards,

Abley Limited



Dave Smith
Technical Director, Transportation Planning

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E [REDACTED]



Logan Copland
Principal Transportation Planner

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