

Resource Consent submission

To: The Chief Executive
Environment Southland
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Date 22/06/2025 09:54
Online reference number RC250652991

Full name of submitter Chris and Sonia Gerken
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Contact phone number
Email

Applicant details

Name of applicant Waikaka Gold Mines Ltd
Activity location 972 Waikaka Road
Chatton North,
Southland
Application number APP-20242608)

Submission details

My submission relates to the whole application Yes
Submission uploaded 2025-06-22 Waikaka Gold Mines Ltd resource consent submission.pdf (83 kb)
I am a trade competitor of the applicant (for the purposes of section 308B of the Resource Management Act 1991) No

For now
& our future



Outcome sought

I wish Environment Southland to make the following decision To oppose the application.
Why I wish Environment Southland to make this decision as attached

Hearing details

I wish to be heard in support of my submission Yes
I would consider presenting a joint case if others make a Yes
similar submission
I wish to be involved in any pre-hearing meeting that may be Yes
held for this application

Confirmation

I will serve a copy of my submission on the applicant and I confirm all of the above information is correct

For now
& our future



Submission re: Waikaka Gold Mines Ltd application to establish and operate a gold mine at 972 Waikaka Road

This submission relates to land use consents, and water and discharge to air permits sought by Waikaka Gold Mines (WGM) from the Gore District Council and Environment Southland.

- **Environment Southland ref: APP-20242608**
- **Gore District Council ref: LU 24035**

Background

My husband and I own and reside on a 9-hectare lifestyle block at 7 (2)(a) [REDACTED] We have lived here for 31 years and experienced first-hand the impacts of gold mining in this valley when L&M Mining previously operated nearby.

Waikaka Road runs adjacent to our property, and we are downstream from the proposed mining site.

Our land lies approximately 1.5 km from the L&M pond, the southern boundary of the proposed mining area, as shown in Fig. 2 of the Town Planning Group (TPG) report.

The “western drain” referred to in the application runs south along Waikaka Road to our northern boundary, then flows across neighbouring land adjacent to our north and eastern boundaries before veering east toward the Waikaka Stream.

Our home is located just 433 metres from the stream.

Community Consultation

While the Resource Management Act does not mandate pre-lodgement consultation, I wish to express concern over the applicant's lack of proactive engagement with directly affected residents and the wider community, particularly those of us living downstream.

Much of the information we have accessed about this project has come via media articles, including the initial announcement that the application was being considered under fast-track legislation and subsequent coverage of a public meeting. That meeting, held just four days before Gore District Council's submission deadline, was the only one conducted that we are aware of.

During the meeting, the applicant was unable to adequately answer technical questions or concerns about the age and relevance of some of the reports relied on. No hard copies of the application were made available to attendees.

Despite our property's proximity to the proposed mining area, its location directly downstream (in terms of aquifers, drainage channels, and the Waikaka Stream), and our previous experience with mining impacts, Waikaka Gold Mines has not approached or consulted us at any time.

After I contacted Noel Becker to raise concerns about this lack of engagement, having only learned of the public meeting through the media, he suggested the purpose and nature of the application had been widely circulated through the media and “word of mouth,” following engagement with directly affected landowners. We do not believe this approach meets the spirit or expectations of meaningful community consultation.

At the public meeting, WGM admitted it had “probably rested on its laurels” with consultation, which contradicts the statement in its application that “extensive pre-application consultation has been undertaken with landowners and neighbours.”

Such inconsistencies contribute to our overall lack of confidence in the transparency and robustness of the process to date.

Hydrology and Water Table Impacts

The application proposes excavation to depths between 20 and 50 metres below ground level. However, it lacks analysis of potential impacts on aquifers beyond the immediate mining zone. What assurances can be given to downstream landowners that the water table will not rise, increasing flood risks during high rainfall?

Section 3.5.2 of the application notes that farm drains discharging into the Waikaka Stream will be removed, with water instead diverted to the western drain or the mine pit. These channels run adjacent to the boundaries of our property. When the Waikaka is in flood, these drains already back up. What impact will redirecting additional water into these channels have?

We experienced severe flooding when L&M Mining was active, due in large part to altered hydrology in the valley. What guarantees can the applicant provide that the same will not occur again?

Waikaka Stream – Ecological and Downstream Effects

Section 2.3.4 acknowledges that the Waikaka Stream is a critical spawning ground for brown trout and bullies, feeding into the internationally recognised Mataura River fishery.

We submit that the stream diversion and other mining activities pose a significant threat to this ecosystem.

While the applicant claims any water quality degradation during construction will be “temporary” (Section 5.7.1), it also states (5.7.2) that:

- Magnesium concentrations will increase,
- Dissolved iron concentrations will increase significantly, and
- Arsenic concentrations will increase significantly.

Given arsenic’s toxicity and environmental risks, we find it deeply concerning that the application concludes these “do not pose any water quality risk.” This statement warrants far more scrutiny.

We also note that the stream monitoring site at Willowbank, referenced in Section 2.3.4, was not functioning during major floods four to five years ago. We request confirmation that it is now fully operational and capable of capturing reliable data during future events.

Flood Risk and Climate Resilience

Section 3.6.2 states that temporary bunds will be constructed to protect the mine pit and infrastructure from flood flows. While these measures may shield the mine, what impact will they have downstream? Could they redirect floodwaters into farm drains or across neighbouring farmland, including ours?

As the project site lies within a known floodplain, it is critical that the proposal demonstrates how it aligns with the Southland Climate Change Strategy, which predicts more frequent and severe weather events. We could not find any reference to this strategy in the application.

Ground and Surface Water Contamination

Section 2.3.3 concedes that the extent of confined aquifers in the area is not fully known and that groundwater from unconfined aquifers may discharge into the Waikaka Stream. In a floodplain context, how can downstream residents have confidence that contaminated water, especially containing arsenic, won't enter our ecosystems and affect soil, livestock, or water supplies?

Traffic Impacts

Traffic counts from June 2021, cited in the application, under-represent activity on Waikaka Road, as they were taken during winter when dairy farms are not operating at full capacity. Milk tankers and agricultural vehicles are frequent on this road during other seasons.

The application forecasts 1,000 vehicle movements during the three-month construction phase and an ongoing increase of 30 vehicles per day. This will materially affect our road use, creating increased noise and safety risks when entering and exiting our driveway.

Property Value and Livelihood

The proposal seeks a 20-year consent term, with no limits on when mining may occur within that window. The fact the operation will start at the farthest point from our home and move closer over time raises understandable concern about how this will affect our property value.

We are approaching retirement and may soon want to sell. Any mining activity of this scale so close to our home, and extending potentially over two decades, will undoubtedly affect buyer perceptions and therefore reduce the market value of our home and land.

Conclusion