

**Before Southland Regional Council
and Gore District Council**

In the matter of the Resource Management Act 1991

And

In the matter of the hearing of submissions on applications for resource consent
by Waikaka Gold Mines Limited to establish and operate a
mineral extraction activity (APP-20242608 and LU 24035)

Memorandum for Applicant following Commissioners' Directive #1

Dated 19 November 2025

Hearing Date 3-4 December 2025

May it please the Commissioners

1. This memorandum is filed for the applicant, Waikaka Gold Mines Ltd (**applicant**) following receipt of the Commissioners Directive #1, dated 11 November 2025. The applicant is grateful for the Commissioners' guidance in terms of preparation for the hearing. In the same vein, the applicant here sets out its intended approach to the hearing, and seeks some further direction.
2. In terms of evidence to be called, the applicant has today filed the following witnesses:
 - (a) Warren Batt - operations, geology and consultation
 - (b) Tom Heller - hydrogeology and water quality
 - (c) Paul Weber – acid mine discharge
 - (d) Ramon Strong - flood hazard
 - (e) Ross Dungey - aquatic ecology
 - (f) Ben Espie - landscape
 - (g) Rhys Hegley – acoustics
 - (h) Anita Collie – planning.

3. In line with the direction at 2.3(b), the majority of witnesses will attend in person, however we seek leave to have Mr Weber, Mr Espie and Mr Hegley attend online. We understand the Council chamber is well equipped for online attendance. Mr Weber will be overseas at the time of the hearing so is unable to attend in person. I also note he is currently only available on the first day of the hearing, 3 November 2025. There is minimal disagreement as to the content of the landscape evidence and essentially none on noise evidence. Having Mr Espie and Mr Hegley attend in person would be a significant cost to the applicant, without any particular benefit to the hearing process.
4. The applicant would therefore be grateful for confirmation that Mr Weber, Mr Espie and Mr Hegley may attend the hearing online (unless they are otherwise excused).
5. The applicant notes the Commissioners' direction in relation to expert conferencing and will be facilitating that for all disciplines other than noise (there being no matter of disagreement). The applicant's aim would be to file any joint witness / conferencing statements by 28 November 2025, although the planning conferencing may not occur until 2 December, to allow the planners to consider the outcome of the experts' positions when discussing conditions.
6. In terms of the site visit, the applicant is preparing a detailed map to guide the Commissioners and this will be filed by this Friday per the direction.



Asher Davidson
Counsel for Waikaka Gold Mines Ltd
19 November 2025