

Before the Independent Hearing Panel

In the Matter of the Resource Management Act 1991 (**RMA**)

And

In the Matter of an application to the Gore District Council and Environment Southland for resource consents to establish and operate a gold mining activity near 972 Waikaka Road, Chatton North, Southland

Reference APP-20242608 (Environment Southland)
LU 24035 (Gore District Council)

Supplementary Evidence of Warren David Batt

on behalf Waikaka Gold Mines Limited

Dated 28 November 2025

Introduction and Scope

1. My name is Warren David Batt. I prepared a statement of evidence in support of the application by Waikaka Gold Mines Limited (“the Company”) dated 19 November 2025.
2. This supplementary evidence is to provide additional information that has arisen since I made my first statement, namely:
 - a. Addressing the revised position of Hokonui Rūnanga, including discussion of the planting plan referenced in their letter advising of the change of position;
 - b. Clarifying some statements on behalf of the Company reference in the evidence for the Department of Conservation (**DoC**);
 - c. An update on discussions regarding the bond to be paid by the Company in respect of conditions and access arrangements;
 - d. Providing a compiled set of plans, for reference at the hearing.

Hokonui Rūnanga

3. On 26 November 2025, Hokonui Rūnanga advised Gore District Council by letter that it changed its position to one of opposition to the application to a neutral stance. For ease of reference, a copy of that letter is attached as **Attachment 1**.
4. As outlined in the letter, the change of stance reflects a constructive and positive engagement process between the Company and Hokonui Rūnanga, which will ensure the parties continue to work together for the duration of the project.
5. The letter confirms that the conditions proposed in Ms Collie’s evidence on behalf of the applicant have been prepared in collaboration with Hokonui.
6. The letter also refers to a riparian planting plan which has been developed collaboratively between Hokonui Rūnanga and the Company. A copy of the plan referred to is attached as **Attachment 2**. It is not proposed by Hokonui or the Company that the planting plan be adopted as part of the plan set, but rather is a reference that will form input into the detailed design of the rehabilitated channel and habitat features referred to in Conditions 35 and

36 of Ms Collie's draft conditions.

7. Proposed condition 35 requires, among other things, a minimum of 5m planted riparian margin, and condition 36 requires the detailed design to be undertaken in consultation with a suitably qualified ecologist, river engineer and Hokonui Rūnanga. The planting plan is one component of the wider rehabilitation reach design, which will likely need to be adapted to suit the particular reach being worked on.
8. The Company wishes to formally acknowledge the positive and constructive way in which Hokonui Rūnanga has engaged in this process.

Statements referred to by DoC

9. I have read the evidence of Ms Jane McLeod and Ms Jane Bowen for DoC and note that they refer to information obtained through conversation with the applicant's representatives. I understand the discussions were primarily with Mr Noel Becker, who is the General Manager of the Company. I wish to clarify or correct some of those statements.
10. At para 47 of Ms McLeod's evidence, she refers to a discussion with the applicant to the effect that Pond 8 might be infilled. This is not the case, pond 8 is outside of the mine footprint. Pond 8 is located on the margin of the 30m setback from the mine.
11. At para 51, Ms McLeod refers to the applicant having indicated that a bridge would be used for stream crossings. While final designs have not yet been completed, the Company currently favours a bridge for stream crossings. Regardless, the stream crossing can be designed and constructed in compliance with permitted activity rules in the regional plans and NES-FW.
12. At para 28 of Ms Bowen's evidence she refers to a personal communication with Mr Becker to the effect that the diversion channels would be set at approximately 5m in width and therefore narrower than the average 8.15m width of the Waikaka Stream identified in Mr Dungey's report. To clarify, the low flow channel is approximately 5m wide and the overall width of the diversion channel is approximately 38m wide. This is identified in the design plans in the Hall Report.

Bond

13. Ms Collie's evidence includes proposed Bond conditions, from condition 122 – 131.
14. By way of update, the Company has been in continued discussions with the various parties involved, namely Environment Southland (as consent authority), Gore District Council (as consent authority and landowner), Land Information New Zealand and Department of Conservation (in respect of their interests in public land affected by the stream diversions).
15. It is now generally agreed that there would be two bonds addressing:
 - a. Land reinstatement, to be required as a condition of the Gore District Council land use consent; and
 - b. Progressive bonds relating to the stream diversions. The quantum of this bond will vary depending on the work that is in progress and has been completed.
16. While discussions are ongoing regarding the quantum, drafting and who will hold the bond (as between Environment Southland and Gore District Council), the general structure is agreed. I understand Ms Collie will discuss any required amendments to the proposed conditions at the planners' expert conference and advise of any changes to be put forward.

Plan set

17. Attached as **Attachment 3** is a compiled set of plans, drawn from the application, section 92 responses and plans prepared for the purposes of consultation with submitters.
18. The applicant considered it would be useful to have this set available to all parties for the purposes of the hearing.

Warren Batt

Dated 28 November 2025