

24 June 2026

Terramark Ltd
Level 1, 330 Moray Place
Dunedin 9016

Attention: Darryl Sycamore

Dear Darryl

**RC250077 SANDY POINT ALLUVIAL GOLD MINE
REQUEST FOR FURTHER INFORMATION – NOISE**

We have reviewed the peer review prepared by Styles Group. This letter presents the key issues raised by Styles Group (shown in *Blue*), and we give our response below.

Our responses reference our report *Sandy Point alluvial gold mine – Noise Assessment* (Rp 001 20250974, 5 December 2025), referred to below as the ‘assessment report’.

Assessment of noise effects

1. The MDA report assesses the noise against the noise standards for permitted activities in the zone and for the QLDC zone adjacent. The MDA report simply adopts compliance with the noise standards for permitted activities as being automatically reasonable, despite the activity having Discretionary status overall (according to the AEE). It is well known that compliance with a standard applying to permitted activities in a zone is not adequate and that a more holistic assessment of the noise effects is required. The noise standards for permitted activities were written to manage the effects of activities permitted in the zone – not activities that require consent, and especially not D or NC activities).

Our assessment has considered the ambient noise environment, and the assessment report includes full details of the noise measurements conducted in the area (Section 4.0 of the assessment report). We have also predicted noise from various stages of the proposed mining sequence. We have used this to assess the effects of the predicted noise levels, including consideration of audibility of the noise and duration of the exposure to the noise (Section 6.0 of the assessment report).

In the case of the QLDC zone adjacent, we note that at 36.1 the Proposed QDP (now operable) states ““Reasonable” noise levels are determined by the standard of amenity and ambient noise level of the receiving environment and the Council provides direction on this through the prescription of noise limits for each Zone. Noise is also managed by the Council through the use of relevant New Zealand Standards for noise.” Based on this statement, the noise limits in the QLDC area indicate what is considered to be a reasonable noise level by the QLDC. We predict that the mining operation will comply with the relevant noise limits at all dwellings in the QLDC area.

Assessment of noise at potential future dwellings

2. The MDA report fails to address the effects over land that could be developed as provided by either the CODC or QLDC District Plans. The MDA report should be updated to include an assessment of the noise effects over land that could reasonably be developed so that the effects on neighbouring landowners and their ability to use their land in the way the Plans provide for can be assessed. I consider that this could easily be done by showing the predicted noise level contours for the three scenarios in the MDA Report and the additional scenarios described below, and by clearly showing the noise levels over vacant land and land where the District Plan provides for or anticipated further residential development.

We have reviewed the nearby sites and determined that there are four sites on the eastern side of the Clutha River/Mata-au where a dwelling may be established (i.e. there is currently no dwelling on the site). These are:

- 67 River Ridge Road
- 43B River Ridge Road
- 43C River Ridge Road
- Unidentified Lot on Tarras-Cromwell Road (SH8)

As part of the additional noise modelling, we have undertaken in response to item 3. below, we have developed noise contours showing that predicted noise levels over this site would exceed the daytime noise limit at a small part of one of these sites but would comply at the other sites. The figure below shows the predicted noise contours at the “Unidentified Lot on Tarras-Cromwell Road (SH8)” indicating a predicted exceedance of the 55 dB L_{A10} noise limit at the northern end of the site by 1-2 decibels.

This relatively small exceedance is only predicted when activity is at the closest location to this site. We understand that this would be near the beginning of the proposed mining sequence, which is proposed to be for three years in total. Therefore, given there is currently no dwelling on the site (nor are we aware of a consent to build one), the likelihood of a dwelling being established in this specific area of the site before the mining activity is undertaken is relatively low and if it was, the noise effects would be temporary. Based on this, we consider that the proposed noise levels and effects are both acceptable and reasonable.

Additional noise modelling locations

3. It appears that the MDA report doesn't assess the mining locations closest to some of the houses. I would want to talk this through with MDA, but I expect that there are mining locations that are closer to some of the houses that should be assessed.

My reading of the Application material is that the excavating and processing plant follow the face of the excavation in a zig-zag pattern across the site. That means that the plant will be concentrated together in small areas across every part of the site over the 3-year period.

In contrast, the MDA Report only assesses the concentration of mining plant at three locations

These locations have been used to calculate the predicted noise levels in the MDA Report. The predicted noise levels only represent mining in those three locations. I consider that there are many other locations where the plant will be much closer to the neighbouring dwellings than the three locations selected.

I therefore consider that that a number of additional locations need to be considered to robustly demonstrate the predicted noise levels and effects of the proposal.

I recommend that the scenarios in the MDA Report are supplemented with noise level predictions for the scenarios set out below in yellow circles (reproduced Figure 3 of MDA Report).

We have modelled the additional locations recommended by the peer reviewer, with all plant at ground level — the worst case for both proximity and screening at the surrounding dwellings. This also addresses the concern raised in Item 5. below regarding the depth of the pit used for noise modelling. Noise contours from these additional modelling scenarios are shown in Appendix A.

Assessment at 3360 and 3364 Luggate-Cromwell Road

4. The noise levels have not been predicted for the two closest houses that have given written approval. Based on them being very close, the noise levels will be well over the permitted standards at these houses. Yet the MDA report doesn't list this as a reason for consent. The MDA report needs to predict the noise levels at these houses and list the infringement as a reason for consent so that the conditions can authorise an infringement of the permitted standards at these houses. I also suggest that the written approvals are checked to ensure that they include noncompliance with the permitted noise

standards as a reason for consent. I have a recent decision from the EC on the issue of the reliability of written approvals if you need it to assist with this point.

The original Application and the MDA Report record that the applicant has written approvals from the two dwellings closest to the proposal at 3364 Luggate-Cromwell Highway and 3360 Luggate-Cromwell Highway. I understand that the written approval from 3360 Luggate-Cromwell Highway has been withdrawn or not provided, but the owner / occupier has not submitted in opposition. It is my experience that the lack of submission is not tacit to an approval and an assessment of effects on that property is still required. I therefore consider that noise level predictions should be provided at the notional boundary of the dwelling at this property.

We have predicted the noise level at the notional boundary of the dwellings at 3360 and 3364 Luggate-Cromwell Highway. The predicted noise levels when mining activity is closest to these locations are 65 dB L_{A10} at 3360 Luggate-Cromwell Highway and 59 dB L_{A10} 3364 Luggate-Cromwell Highway. At these levels, noise from mining activity would be clearly audible over the existing ambient noise. Noise levels up to 65 dB L_{A10} have the potential to be highly annoying during outdoor activities.

However, we understand that a formal agreement (similar to an affected party approval) has been reached with these property owners, with the result that noise effects do not need to be assessed at these locations. We have acted on instruction of the project planner on this matter, and they will address this in their submission.

Depth of working pit

5. My reading of the AEE, the Dust Assessment and the Landscape Assessment is that the working face will be "a few metres deep" (AEE) and 3m deep (Dust and Landscape Assessment). However, the MDA Report states that the excavation plant and screens etc will be in a pit that is 7m deep. The additional 4m of depth adopted in the MDA Report (and so in the noise modelling) will significantly reduce the noise levels from the plant. I expect that the predicted noise levels will increase (and potentially considerably) if the plant is elevated to within 3m of the current ground levels.

Can the applicant clarify the depth of the excavation below existing ground level, and the approximate general RL of the plant when it is operating. If the plant is likely to be higher than 7m below ground level, can the applicant provide updated noise level predictions based on the actual range of depths that are likely.

The pit depth will vary across the site. However, the updated noise modelling has assumed activity at ground level as a worst case (see response to Item 3.).

If you have any queries or require any further information, please do not hesitate to contact us.

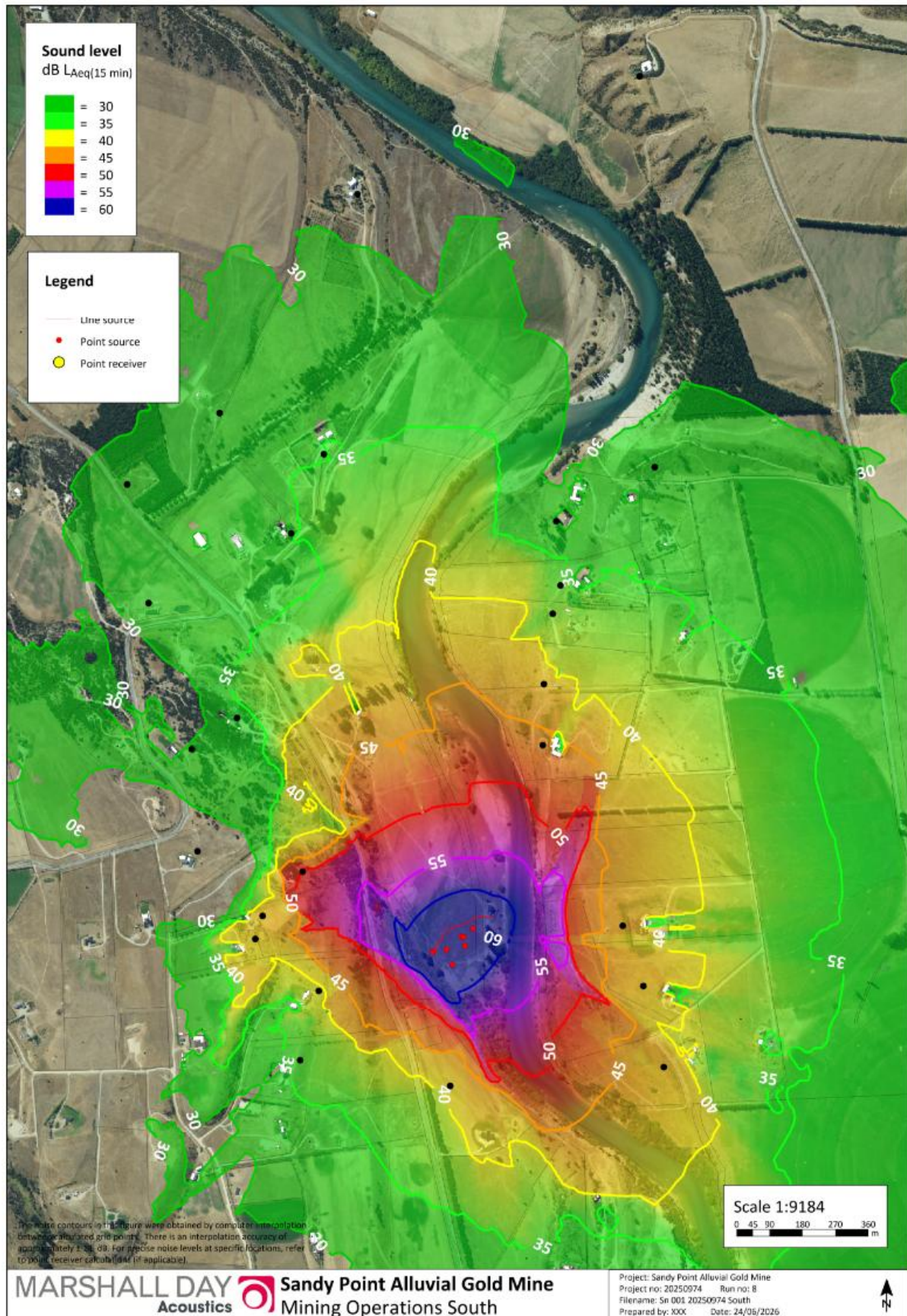
Yours faithfully

MARSHALL DAY ACOUSTICS LIMITED

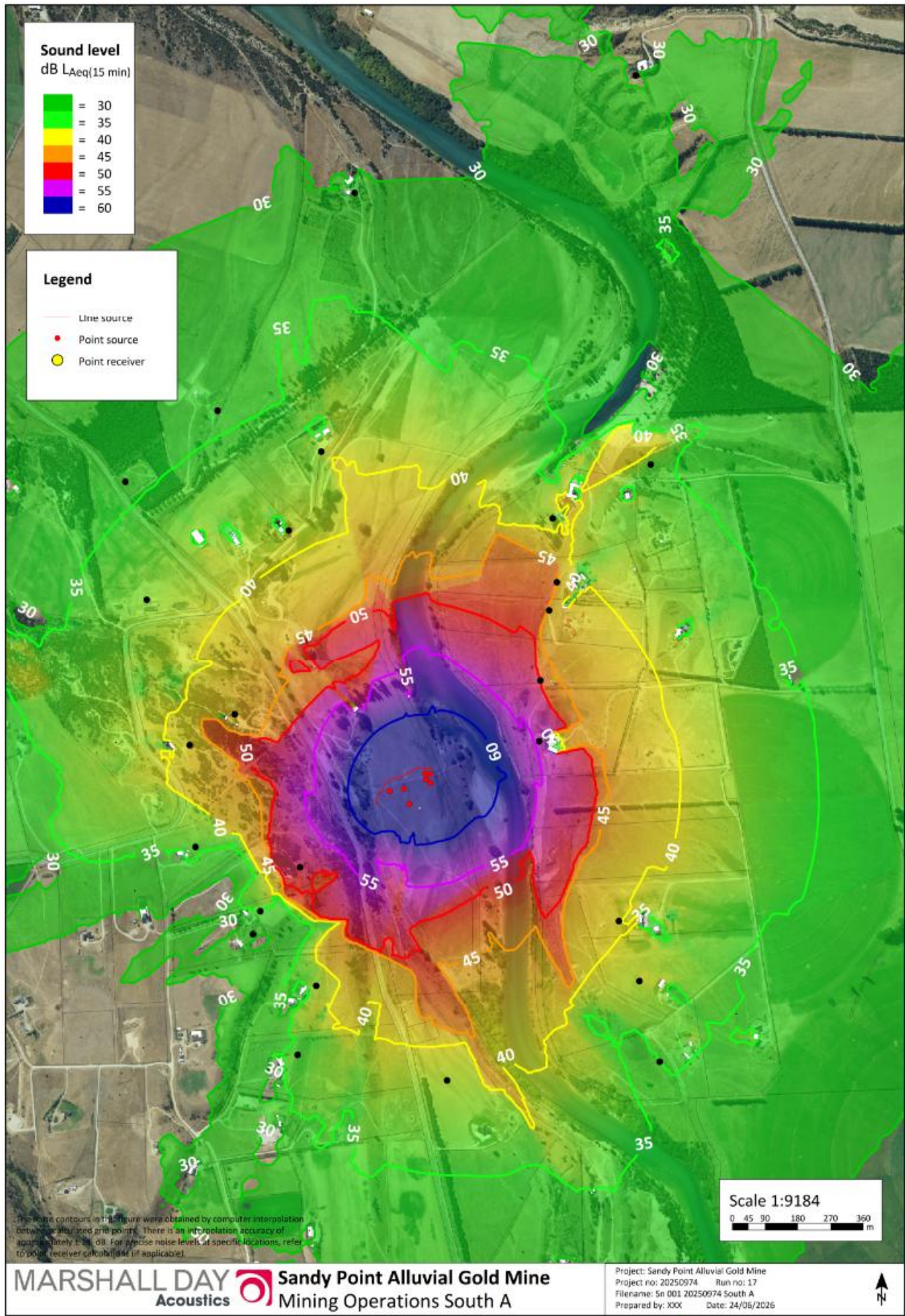
Acoustic Consultant

APPENDIX A NOISE CONTOURS

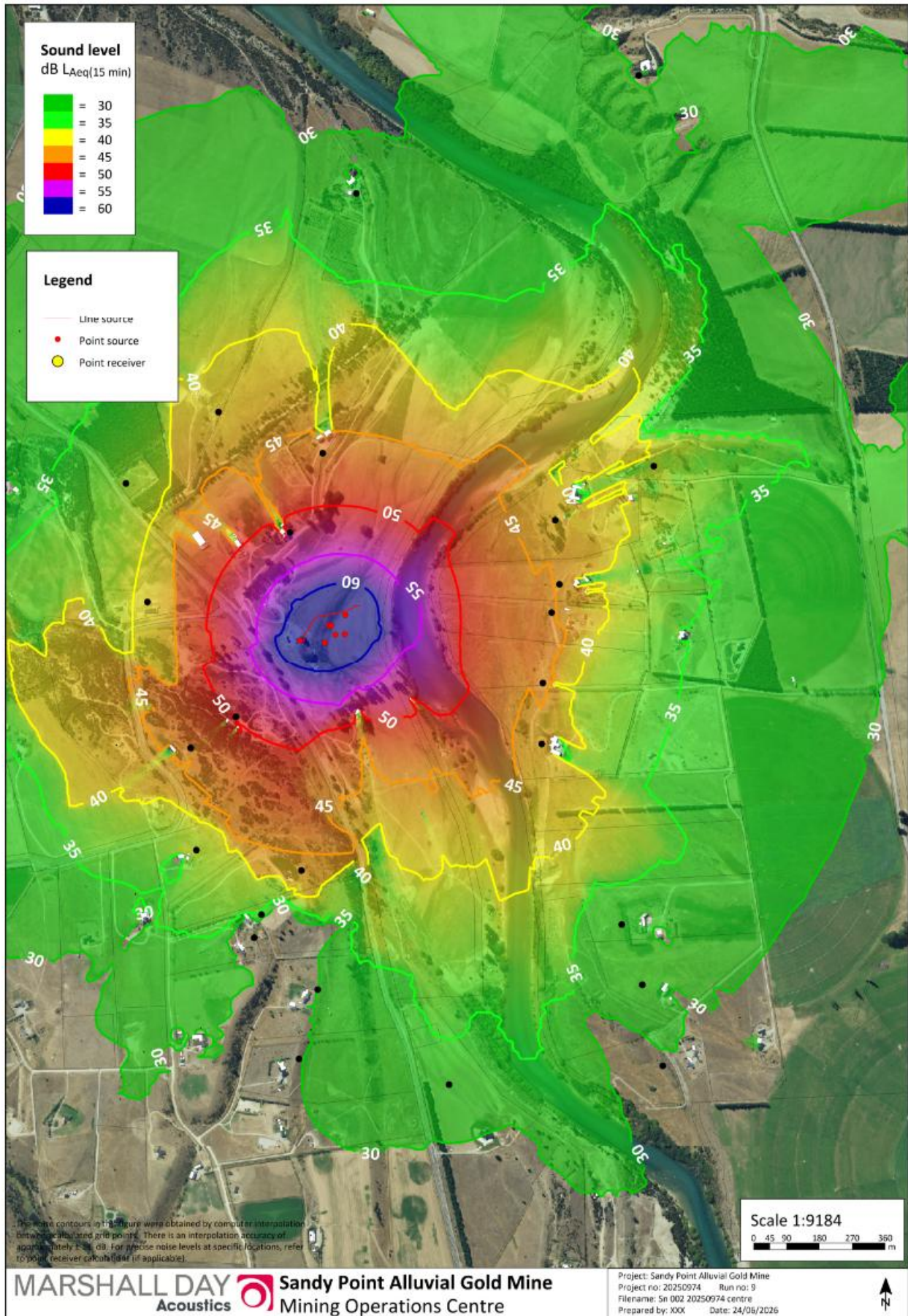
A1 Mining operation south



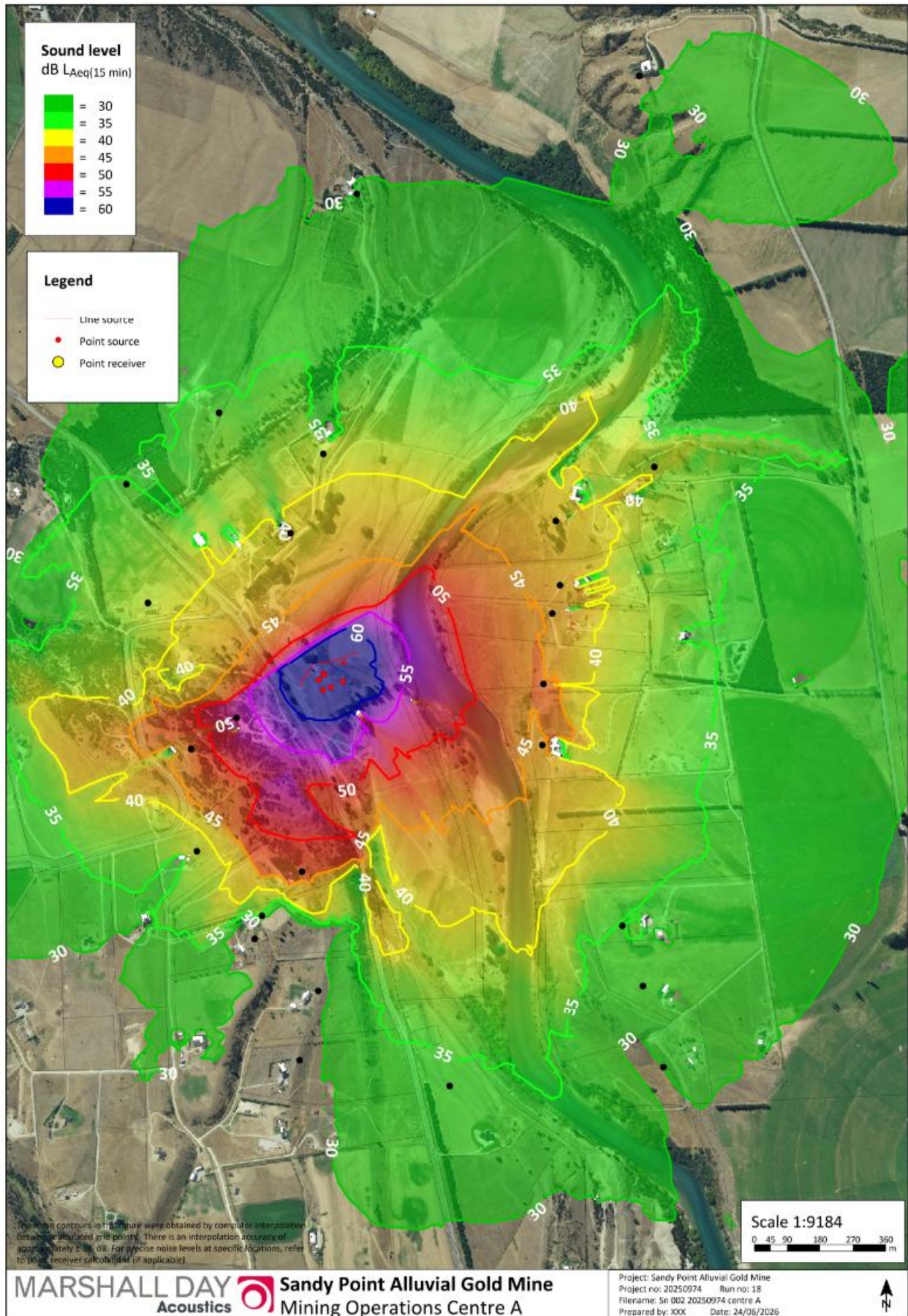
A2 Mining operation south A



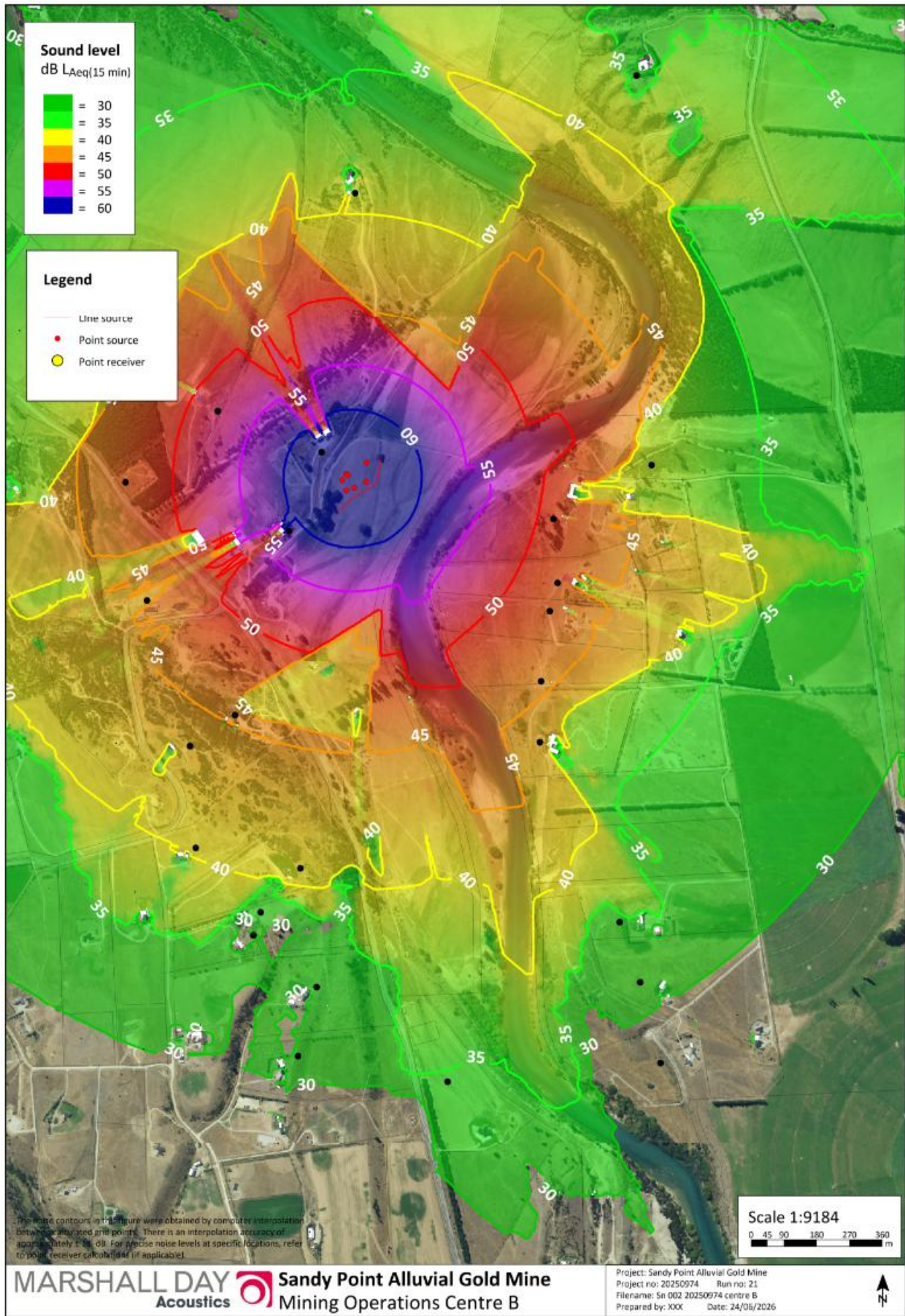
A3 Mining operation centre



A4 Mining operation centre A



A5 Mining operation centre B



A6 Mining operation north

