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Central Otago District Council

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Dear Emma,

RC250077 Awa Koura Mining Limited – RFI and initial comments on noise effects

Styles Group have been engaged by the Central Otago District Council (**CODC**) to provide advice on the Awa Koura Mining proposal at Sandy Point, southeast of Luggate and north of Queensbury.

The details of the proposal are set out in the Assessment of Environment Effects, the Revised AEE, RFI responses and associated application material available on the CODC website¹. This advice refers to that material collectively as the **Application**.

This advice focuses on the report prepared by Marshall Day Acoustics entitled “*Sandy Point Alluvial Gold Mine Noise Assessment*”², (the **MDA Report**).

I provided several informal questions to you by email on 26 March 2026 and I understand that these have been provided to the applicant. Those questions are reproduced below in italics with some supplemented with a succinct additional request to make the issue or request as clear as possible.

- 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.*

I consider that the applicant should provide more holistic assessment of noise effects. I suggest that this comprises an assessment of the level, character, timing and duration of the proposed noise sources against what could reasonably be expected in the zone. What

¹ <https://www.codc.govt.nz/services/planning/b-notified-consents/current-publicly-notified-consents/rc250077-awa-koura-mining-limited-submissions-closed>

² *Sandy Point Alluvial Gold Mine Noise Assessment* Rp 001 20250974, 5 December 2025, Marshall Day Acoustics

can reasonably be expected in the zone can be determined by considering the types of activities that the District Plan provides for and anticipated in the zone at up to the noise standards for permitted activities. This will inform the amenity expectations for the zone. The effects of the proposal can be considered against the amenity expectations for the zone.

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.

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.

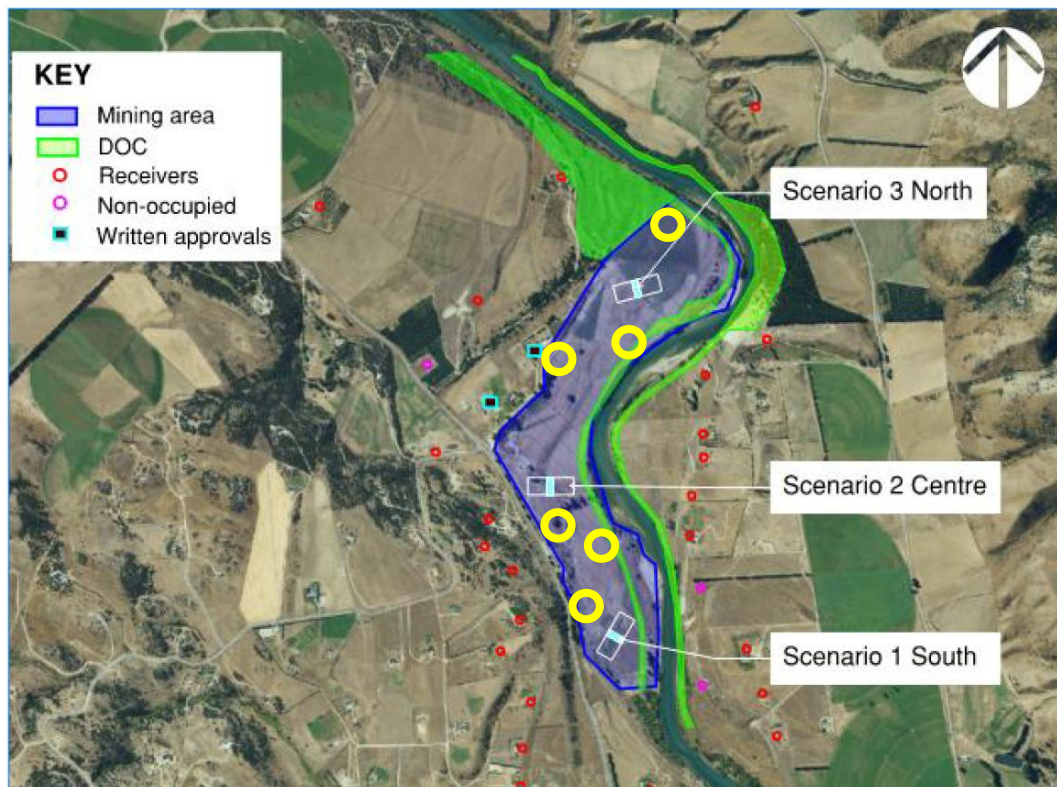
In contrast, the MDA Report only assesses the concentration of mining plant at three locations³. These locations have been used to calculate the predicted noise levels in the MDA Report. The predicted noise levels only represent mining in those three locations. I consider that there are many other locations 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).

³ Section 5.3 and Figure 3 of MDA Report

Figure 3: Aerial view of modelling assessed scenarios



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.

I have also prepared one additional request for information or clarification:

- 1) 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.

Please contact me if you require any further information.

Yours sincerely,



Jon Styles, MASNZ
Director and Principal