

**Before the Independent Hearing Panel**

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

**And**

**In the Matter** of an application to the Central Otago District Council and Otago Regional Council for resource consent to establish and operate a gold mining activity at 1346 – 1536 Teviot Road, Millers Flat

**Reference** RC230325 (Central Otago District Council)  
RM23.819 (Otago Regional Council)

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**Memorandum of Counsel on behalf Hawkeswood Mining Limited**

**Dated 5 April 2024**

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## **May it please the Panel**

1. I act for the Applicant, Hawkeswood Mining Limited (**HML**).
2. This Memorandum addresses matters arising in preparation for the upcoming hearing of this matter.

## **Updated Information**

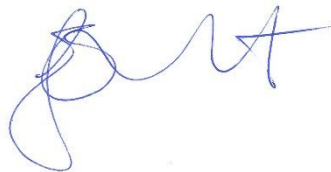
3. HML has been progressing updated information relating to several aspects of the proposal. Rather than attach it to evidence for HML when circulated in several weeks' time, HML provides that information now to assist the reporting planner and the submitters.
4. Therefore, **attached** to this Memorandum is the following:
  - a. Updated site plans and an associated site plan description;
  - b. Updated written approvals package for ease of reference;
  - c. Soil contamination testing report for the historic stockyards;
  - d. Archaeological report; and
  - e. Biodiversity and ecological summary.

## **Witnesses**

5. HML has commenced preparation of draft evidence.
6. I am unaware what provision there will be for attendance by witnesses through online technology.
7. Neil Williman of GeoSolve Limited prepared the flooding assessment. Mr Williman will be overseas for all of May (and therefore overseas during the hearing).
8. If Mr Williman is required to present evidence 'in person' and answer questions from the Panel, that of necessity would need to occur remotely.

In that circumstance I respectfully request his appearance be scheduled early in the morning NZ time as Mr Williman's time zone will be offset by approximately 10 hours.

9. HML is preparing a full case in support with evidence from all expert consultants. However, it is likely that some experts will be addressing matters which are not contested or are not controversial. HML will still provide a statement of evidence in that circumstance which puts the position on record in evidence before you and confirms whether the s42A report or any submissions received have changed the analysis and recommendations in the relevant expert earlier reports. Having said that, in the interests of managing costs and hearing time, where evidence is submitted which is not contested, is not controversial and which does not give rise to any questions from the Panel, I anticipate requesting the Panel indicate whether they wish to hear from that witness or whether that witness might appear remotely. I will return to that issue once evidence from submitters has been received.



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**Jeremy Brabant**

**Counsel for Hawkeswood Mining Limited**

Dated 5 April 2024

