

Before the Hearing Commissioners
Appointed by the Grey District Council
and West Coast Regional Council

Under the Resource Management Act 1991

In the matter of Resource consent applications by TiGa Minerals and Metals
Ltd to establish and operate a mineral sands mine on State
Highway 6, Barrytown (RC-2023-0046; LUN3154/23)

Summary Statement and Rebuttal Evidence of Nicholas Peter Fuller

2 February 2024

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**anderson
lloyd.**

Summary of evidence

- 1 My name is Nicholas Peter Fuller.
- 2 I prepared a statement of Transport evidence dated 19 January 2024. My qualifications and experience are set out in that statement of evidence.
- 3 I repeat the confirmation given in that statement that I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court.
- 4 My role in relation to TiGa Minerals and Metals Limited's (**TiGa**) application (the **Application**) has been to provide transport effects advice since 2019.

Summary

Traffic Generation

- 5 The proposed activity is predicted to generate 50 truck and trailer movements per day, which will either be to the north (to Westport) or the south (Port of Greymouth) or a rail load out location at each town. Truck movements will not be permitted during the hours of darkness, leading to a maximum of five truck and trailer movements per hour.
- 6 In addition to the above, staff vehicle movements have been estimated at 140 car movements per day (including ancillary movements throughout the day). That said, the Applicant is proposing a minivan service to reduce the number of staff vehicle movements associated with the activity meaning the above vehicle movements would be an over-estimate.

Site Access

- 7 A concept site access arrangement has been designed to accommodate traffic turning to and from the site. The proposed arrangement includes a right turn bay to accommodate traffic waiting to enter the site, as well as a left turn deceleration lane. This access has been agreed with the NZ Transport Agency (NZTA) as being acceptable and it will provide safe and efficient access to and from the site.

Transport Management Plan

- 8 A Transport Management Plan (TMP) is proposed to manage truck movements associated with the proposed activity. This sets out a range of measures including:
 - (a) Hours of operation (such as no night-time trucking and avoiding Barrytown school bus travel times);
 - (b) Reinforcement of the Road Code (such as interactions around cyclists and school buses);

- (c) Identification of locations where additional care is required as there is likely to be higher numbers of pedestrians and cyclists, plus tight road geometry; and
- (d) Reporting of pavement defects and interactions with wildlife.

Cycle Safety

- 9 I have considered the potential effects on cycle and pedestrian safety along the trucking routes. I did not find evidence of high cycle usage of State Highway 6 along the trucking route or promotion of this segment of the State highway network as a cycle route.
- 10 The NZTA has undertaken works at key locations of elevated cycle and pedestrian usage to provide a safer environment. The TMP highlights additional locations where pedestrian and cycle interactions may occur, plus it will be updated as drivers report regular encounters.

Alterations to Application

- 11 The Application has been altered (in response to submissions) to not undertake mining at night. As such, mining could finish as early as 17:40 during winter and this would lead to a potential traffic generation of approximately 42 vehicle movements at that time as a result of the mining shift and processing plant shift finishing at similar times, plus the five truck and trailer movements per hour.
- 12 I consider the transport effects of this increase in peak hour traffic are acceptable. As set out in my Evidence, there is ample capacity on the State highway to accommodate this increase in traffic. The volumes passing the access are also sufficiently low that it will not affect the ability to enter and exit the site.
- 13 These alterations remain within the scope of the transport related conditions. In addition, the proposal for an employee minivan service to / from the site will reduce the light vehicle traffic generation compared to that set out above and assessed in the Transport Assessment.

Submitter Evidence

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- 14 This evidence identifies that staff vehicles are proposed to exit the site during night-time hours and raises concerns regarding the effects on petrels. I understand that this is a concern more associated with the State highway to the north of the site. I expect that the majority of staff at the site would come from the south, as this is the direction to / from closest population centres. As such, I anticipate the staff traffic volume of traffic to / from the north of the site would be low. I also note that the

proposal includes a minivan service to get staff to / from the site and this will reduce the traffic volumes on the network (including in the hours of darkness).

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- 15 One of the concerns raised in this evidence is that trucks associated with the proposed Mine will lead to crashes and therefore put off visitors coming to the West Coast. I have reviewed the NZTA Crash Analysis System for reported truck crashes with other vehicles along both trucking routes in the most recent ten-year period available. The reported crashes are summarised in **Table 1**, which identifies three crashes on the Northern route and five on the Southern route. Of these, one crash on the Northern route was the truck driver's fault and three on the Southern route (including a fire truck manoeuvring). I have also indicated where the crashes occurred in urban areas (i.e. Greymouth), which indicates the majority of crashes on the southern route occurred on the lower speed urban network and not in the higher speed rural areas or typically locations of tight geometry.

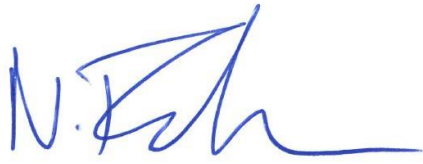
Table 1: Reported Truck and Other Vehicle Crashes

| Crash Detail | Severity |
|---|-------------|
| <u>Northern Route - 66km</u> | |
| 1 – A foreign tourist has crossed the centreline and hit an oncoming truck. | Non-injury |
| 2 – Truck hit a parked car | Non-injury |
| 3 – Car pulling out at SH67 / SH67A intersection failed to give-way to a truck. | Non-injury |
| <u>Southern Route – 36km</u> | |
| 1 - Car crossed centre line and hit a truck. | Non-injury |
| 2 – Car failed to give-way to a truck at an intersection (in Greymouth). | Non-injury |
| 3 – Truck hit the rear of a car slowed in traffic (in Greymouth). | Non-injury |
| 4 – Truck hit a parked car (in Greymouth). | Non-injury |
| 5 – Fire-truck hit a parked police car (in Greymouth) during an emergency. | Non-injury. |

- 16 Overall, I consider that this is a low number of collisions involving trucks and I would not expect this to be made noticeably worse with the proposed activity. Furthermore, these crashes were all non-injury and not likely to make international news outlets.
- 17 A concern is also raised in this evidence regarding the potential effects on pedestrians crossing the road at Dolomite Point. I note that the recent upgrades at this location provide a crossing point for pedestrians, that includes a staging point in the median. That island includes barriers that act as a chicane and turn pedestrians to look at on-coming traffic. I consider this arrangement to provide a safe crossing point for pedestrians.

Conclusion

18 I can continue to support the proposal from a transport engineering perspective.

A handwritten signature in blue ink, appearing to read 'N. Fuller', with a stylized flourish extending to the right.

Nicholas Peter Fuller

Dated this 2nd day of February 2024