

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of an application for resource consents by **TIGA MINERALS
AND METALS LTD**

AND

IN THE MATTER of a submission by the

COAST ROAD RESILIENCE GROUP INC

Lay witness statement of further evidence of Marie Elder
For COAST ROAD RESILIENCE GROUP INC [CRRG]

Comment on Transport Review
prepared by **Mat Collins of Abley Ltd** and dated **29 February 2024**

Dated: 15 March 2024

Coast Road Resilience Group Inc
Email: coastroadrg@gmail.com

INTRODUCTION

1. My full name is Marie Elizabeth Elder. I have a B.A. [Hons] English, Otago University 1977 and taught in Wellington secondary schools for 29 years, most recently as Head of Faculty at Wellington High School. Having moved to the Coast in 2008, seeking – and finding - a quieter, simpler lifestyle, I now work part-time on editing and proof-reading contracts and as secretary to the Barrytown School Board of Trustees. I have several community commitments including Truman Track trapping team leader, Civil Defence co-coordinator, book club convenor and elected community representative on the Dolomite Point Redevelopment Project.
2. I have been asked by the Coast Road Resilience Group Inc. to provide lay witness comment on the transport review of Mat Collins of Abley Ltd. I am not an expert in the matters of transport and this comment is not intended as expert evidence.
3. I am a member of the Coast Road Resilience Group Inc. (CRRG). I have prepared this comment for the CRRG in response to Mr Collins' review.
4. I am familiar with the TIGA application site and the reviewed transport route of Barrytown to Greymouth because I have lived on the Coast Road, just north of Punakaiki, for 15 years and travel to Greymouth most weeks.
5. I appreciate this opportunity, granted by the hearing panel, to comment on Mat Collins' report. I have restricted my comments to the contents of his report, as requested.
6. In preparing this comment, I have reviewed these documents:

Transport Assessment Revised, Nicholas Peter Fuller, June 2023
Waka Kotahi NZ Transport Agency submission, 12 October 2023
S42a Report prepared by Perspective, 22 December 2023
Statement of evidence of Nicholas Peter Fuller, 19 January 2024
Draft Transport Management Plan, Nicholas Peter Fuller, 19 January 2024
Summary Statement & Rebuttal Evidence, Nicholas Peter Fuller, 2 February 2024
Transport Peer Review, Mat Collins Abley Ltd, 29 February 2024

At our request the hearing administrator, Rasela Barrow, sent CRRG a brief from Mark Geddes to Mat Collins [attached as Appendix A]. It asks that Mr Collins "*Peer review the applicant's traffic evidence*" and "*Provide a statement of evidence that*

summarises your peer review; any safety issues; any methods required to avoid, remedy or mitigate safety effects.” [my emphasis].

CRRG does not have information as to why Mr Collins’ statement of evidence is limited to the safety of cyclists and pedestrians [including Barrytown school bus pupils]. The other heightened safety issues such as safety risks linked to road damage; risks to residents entering/leaving driveways; risks to other road users from dangerous overtaking of trucks by frustrated drivers; and risks to health and safety stemming from truck noise and vibration, remain unexplored and unmitigated in his evidence.

7. I acknowledge reference material in footnotes throughout.

COMMENT ON POINTS IN MR COLLINS’ SUMMARY

8. Mat Collins’ assessment is that *“the likelihood and severity scores for most of the route would already score at the highest end of the scale, and therefore could not increase further (even if the risk is increasing)”*¹ and that *“a crash between a truck and a cyclist has a high likelihood to cause a death or serious injury”*²
9. Given this assessment and this acknowledgment, mitigation measures are inadequate for an application which adds significantly to the risk of death or serious injury.
10. Mr Collins refers to ‘balancing’ safety effects and potential mitigations³. This is a precarious balance at best and one which could easily change. For example, Robert Brand told the hearing on 5 Feb 2024 that he wishes to develop a Mineral Separation Plant concurrently with a Barrytown mine, at either Rapahoe or Stillwater. This could draw truck and trailer units from three existing and potential mine sites that we currently know of⁴ and from an unknown number of future mines. If each of the three already-identified mines generated say 50 truck and trailer movements per day [and their individual consents might allow more], there could be 150-plus extra heavy truck and trailer movements per day on SH6. This would surely tip any perceived ‘balance’.

COMMENT ON POINTS IN MR COLLINS’ BACKGROUND MATTERS

11. Mr Collins, referencing the vehicle telemetry site near Canoe Creek, cites *“approximately 11% of total vehicle movements [as] heavy vehicles, which is around 90 to 130 heavy vehicle*

¹Mat Collins at 12 (ii) p4, and 22 p8

² Ibid 13 p6

³ Ibid 14 p6

⁴ Westland Mineral Sands [WMS] Cape Foulwind [existing]; Barrytown, WMS at Mananui

movements per day”⁵. He has not interrogated the nature of these ‘heavy vehicles’ but readers might well assume these to be milk tankers, trucks, and/or truck and trailer units comparable to 50 tonne⁶ TiGa haulage trucks.

12. However, according to the Land Transport Act, ‘**heavy motor vehicle** means a motor vehicle ... having a gross vehicle mass exceeding 3,500 kg’⁷. This means a campervan such as that pictured here triggers the ‘heavy vehicle’ definition in the telemetry data.

13. Campervans such as this are commonplace on the section of SH6 the applicant wishes to use as a mine haulage route. So far as I am aware, no official count has yet been made of the numbers, but it is likely campervans outnumber trucks and truck and trailers on an annual basis, and certainly in the tourist season from October to April. Their proliferation in the carpark at Dolomite Point [photos below] is testament to this.



Weighing in at 3500kg, the Eura Mobil Pro T 725 QB gets by on a WOF and can be driven on a Class 1 car licence



Both photos taken in Dolomite Point carpark 12 March 2024

⁵Mat Collins, 15 (a) and (b) p6

⁶ Estimated total weight of loaded truck & trailer unit given 30 tonnes HMC plus approx. 20 tonnes empty weight

⁷<https://www.legislation.govt.nz/act/public/1998/0110/latest/DLM433619.html>

14. As a regular user of SH6, I frequently encounter campervans such as that pictured and would consider them a much lesser risk to cyclists and pedestrians than a 50-tonne truck and trailer unit. They are lighter, by up to 46.5 tonnes, and generally travel at slower speeds.
15. Local cyclist Suzanne Hills has this to say about the comparative risks posed by large campervans and by trucks: *“In over 8300km cycling SH6 from Barrytown to Greymouth, I have not had a near-miss, been cut off⁸ or had to deal with the hair-raising suction effect of a passing campervan. Campervan drivers demonstrate safe and considerate behaviour towards cyclists by passing slowly and/or at an appropriate distance and place. I believe this is due to the likely factors of: driving cautiously from a lack of experience/ confidence driving a large campervan on NZ roads; not being under time pressure; not de-sensitised to driving SH6; and many drivers coming from countries with cultures of care towards cyclists, and/or they are cyclists themselves. Conversely, I have experienced unsafe and inconsiderate behaviour from car and truck drivers alike. Large trucks, and truck and trailers, present the greater risk because of their bulk and length.”⁹*
16. Mr Collins does not make a calculation as to the potential increase in heavy vehicle movements were the application to be consented. However, quoting an existing “90 to 130 heavy vehicle movements per day” as measured at Canoe Creek¹⁰, gives the misleading impression that 50 more heavy vehicle movements would mean an increase of between 38% to 56%. However, as many of the vehicles currently registering as ‘heavy’ in the telemetry data are actually only a very small fraction of the size and weight [7%] of a mining truck and trailer, they should be excluded from the comparison. A genuine estimation of the potential increase in truck movements could only be made were data available on the actual number of trucks, or truck and trailer units, already using the Coast Road.
17. An informal survey on the afternoon of Thursday 14 March, carried out on a return trip from the proposed mine site to the Cobden Bridge outside Greymouth [total time one hour], yielded these numbers:¹¹

TIME PERIOD	Large campervans	Trucks or truck and trailer units	Cyclists	School buses
13.25 – 13.55	8	3	3	1
15.55 – 16.25	9	3	2	1
TOTALS	17	6	5	2

⁸https://www.legislation.govt.nz/regulation/public/2004/0427/latest/DLM303048.html?search=sw_096be8ed81dce553_Passing_25_se&p=1&sr=4 26 (3) A driver must not, when **passing** another vehicle moving in the same direction, move into the line of passage of that vehicle until the manoeuvre can be made safely and without impeding the movement of that other vehicle.

⁹ Personal email 11 March 2024

¹⁰ Mr Collins 15(b) p6

¹¹ Vehicles counted were those oncoming, or those overtaken while travelling in the same direction

Time constraints mean this is a very limited sample with a significant margin of error, but as a regular user of SH6 my perception is that this is not an unusual vehicle distribution at this time of year. It indicates that five further truck and trailer units per hour, as proposed, could approximately double the existing hourly number.

18. Mr Collins does not refer to the number of other heavy vehicles which might enter and leave the site in any one day, such as those delivering fuel or heavy machinery. Numbers could be expected to be higher during the construction phase, but additional heavy vehicle movements would continue during any mining operation.
19. Mr Collins, in acknowledging that pedestrian numbers have not been quantified,¹² refers to pedestrian movements as related to school bus pick up and drop off. These would be the majority of movements, but there are also significant numbers of tourists who walk along the roadside, having found a place to park, walkers both local and visiting, and, increasing again in numbers recently, hitchhikers.¹³
20. Mr Collins is of the understanding that *“there is a degree of consensus across all parties that the existing environment of SH6 creates inherent risk for pedestrians and cyclists”*. While this may be strictly true, it is worth pointing out that pedestrians and cyclists were given little if any consideration by the applicant in the original application documents, nor in their expert’s reports until submitters brought attention to the risks. Even then, the draft Traffic Management Plan [TMP] of 19 January 2024 did not go beyond adherence to road rules and monitoring any *“regular observations”*.
21. Mr Collins writes that he has not attempted *“to quantify the scale of the safety effects generated by the proposed activity”*¹⁴. This is something that needs to be done.

COMMENT ON POINTS IN MR COLLINS’ SITE VISIT OBSERVATIONS

22. Mr Collins writes that he *“did not observe any pedestrians or cyclists on the section of SH6 north of Rapahoe”*¹⁵ during his 23 February 2024 site visit. He does not say why his record is limited to this section of the proposed haulage route. It is worth noting that on the same day, a local resident cycled into Greymouth from just south of the proposed mine site and encountered four other cyclists, so was one of five on the Coast Road at that time¹⁶. More recently, on 13 March 2024, she cycled in again and was one of three cyclists around the 900m Cobden Hills stretch [the first location of risk in Mr Collins’ Appendix A].

¹² Mat Collins 15 (c) p7

¹³ Personal observation: four hitchhikers in one trip between Punakaiki and Greymouth, 9 March 2024

¹⁴ Mat Collins 20 p8

¹⁵ Ibid 23 p8

¹⁶ Personal email from Suzanne Hills, 10 March 2024

23. I appreciate Mr Collins taking the time to assess the carriageway for locations of risk, identifying several in his Appendix A. It is worth noting that between 850m north of Rapahoe and the bottom of 17-Mile Bluff the total distance is 13kms. The seven high risk locations here total 9kms, i.e. 70% of it¹⁷. It would be simpler to acknowledge the entire 13km section as of heightened risk.
24. The southbound section opposite the passing lane just north of Waianiwaniwa /Ten Mile Creek should be added to the list of locations, as it is one of the riskier sections for cyclists with no shoulders, blind corners, a steep downhill run and two lanes of oncoming traffic, one of which is accelerating in order to pass the other.
25. Mr Collins lists three likely causes of crashes¹⁸ in these locations, and this goes some way towards compiling the information needed for a full safety assessment. The video shown to the hearing by Suzanne Hills as part of her personal evidence on Thursday 8 February 2024 demonstrates the regular likelihood of these causes of crashes.
26. The Wramborg curves¹⁹ showing the probability of cyclist fatality, and Mr Collins' comment that the speed would be even less for a heavy vehicle, are chilling.
27. It remains a concern that the applicant did not see a need to carry out this kind of assessment. This oversight casts doubt on the level of commitment they might be expected to show towards Mr Collins' recommendations.

COMMENT ON MR COLLINS' RECOMMENDATIONS FOR MINIMISING POTENTIAL SAFETY RISK

28. Without prejudice to the position that this application should be declined, Mr Collins makes some useful recommendations:
 - a. Mr Collins' recommendation that truck drivers be required to communicate to each other "*any real time observations of cyclists or pedestrians along the route*" [my emphasis] is a considerable improvement on the imprecise requirement in the applicant's Traffic Management Plan [TMP] to report '*regular observations of cyclists*' and those only to the Project Manager
 - b. It is always concerning to see potential infrastructure solutions which might save lives dismissed because the "*costs associated with this would not be*

¹⁷ Measured by Suzanne Hills, 13 March 2024

¹⁸ Mat Collins 25 (a) – (c)

¹⁹ *ibid* Figure 1, p10

warranted”.²⁰ That said, the active and static signage Mr Collins goes on to suggest “*could be warranted*” would constitute an improvement

- c. I concur with Mr Collins’ recommendation that the applicant be required to “*prepare and implement a signage and marking plan*”²¹ [my emphasis] as per his later recommendation for an additional condition of consent.

29. Mr Collins’ recommended amendment to Condition 15.7²² still does not consider secondary school bus students, some of whom may be as young as 12 or 13, who are required to walk at least a kilometre along the roadside, within 3kms of the proposed mine site, in order for the bus to stop at a designated safe spot.

30. Some minor proof-reading would make Mr Collins’ amendments to 15.9 and 15.10 [his point 39] clearer: “*The Transport Management Plan must include ...*” [my emphasis]. And in his point 42 italics: “*At least 10 working days prior to any truck movements ... the Consent Holder must prepare and implement ...*”. And “*The signage and marking plan must be prepared by ...*”.

31. Without prejudice to the position that this application should be declined, Mr Collins’ recommendation at 39 (viii) should specify avoidance of air brakes along all areas of the haulage route where there are dwellings within say 30m of the highway.

32. Without prejudice to the position that this application should be declined, the new Condition detailed in Mr Collins’ point 42 on p17 re a signage and marking plan is rigorous and helpful.

COMMENT ON MR COLLINS’ CONCLUSION

33. Each of the 13 bridges²³ along the mine haulage route between Barrytown and the Cobden bridge needs to be added to the high-risk locations identified by Mr Collins in Appendix A, as each has barriers on both sides and very narrow shoulders. That is, as shown in the examples below, each bridge is a pinch point where a cyclist or pedestrian has nowhere to go if finding themselves on a collision course with a vehicle.

²⁰ Ibid 35(a) p13

²¹ Ibid 35 (v) p14

²² Mat Collins 37 p15

²³Canoe Creek, Granite, Fagans, Bakers, Fourteen Mile, Thirteen Mile, Waianiwaniwa/Ten Mile, Kotoreti/ Nine Mile, Seven Mile, Coal Creek No 2, Camp Overbridge, MacLeans Creek, Coal Creek No 1



Seven Mile Creek



Camp Overbridge

34. Without prejudice to the position that this application should be declined, I have additional suggestions for mitigation:

- i. At each bridge, a sign “No overtaking of cyclists on bridge”
- ii. At the particularly high-risk section identified by Mr Collins as ‘Between Coal Creek rail overbridge and approximately 100m east of Bright Street’:
 - (a) This section is more accurately identified as the 900m between the existing ‘Share the Road’ signs i.e. it starts further east at the Coal Creek No 1 bridge, not at the Coal Creek rail overbridge as stated by Mr Collins
 - (b) A cyclist-only transit on timed traffic lights, activated by the cyclist, would potentially be a 100% safe solution.²⁴ However it presents difficulties in this location as it could take non-ebike cyclists about 5 – 6 minutes to transit. This section has a much higher traffic volume than the rest of SH6 north of Rapahoe and would cause a backup at Cobden Bridge turnoff for north-going traffic, leading to driver impatience
 - (c) The underlying risk factor is vehicle speed, especially in the morning and afternoon 'rush hour' with many drivers going at or near 100kph. A 50km zone for the section leading to the bridge would make it safer. Even better might be a 30km zone, as in the light of Mr Collins' Figure 1, the probability of a fatality from cyclist vs vehicle crash would reduce to 10% in a 30km zone. The

²⁴ This system was in place, a few kilometres outside Takaka, prior to the road being widened recently

problem with this might be the likelihood of poor compliance, possibly creating heightened danger²⁵. A 50kph zone seems a sensible compromise.

- (d) Create a “No overtaking of cyclists” zone for this section, creating a moving shield for cyclists²⁶. Preferably this would be combined with a 50kph zone, extended from the Cobden bridge urban area, followed by “Overtake cyclists with care” for vehicles heading towards Rūnanga. This would need to be part of truck driver training and employment expectations.

Note: ‘Share the Road’ signs have been in place for over a year in this section but anecdotal evidence from cyclists is that it has not materially reduced vehicle speed, nor improved driver behaviour, and therefore the risk remains as before.

CONCLUDING COMMENTS

35. I wish to acknowledge the thoughtfulness of much of Mr Collins’ report, the fact he is aware of the need to “*grapple with*” the risks and difficulties, and his recognition of this as an issue where there is a “*high likelihood [of] death or serious injury*”.²⁷
36. I differ from Mr Collins at his point 48: I do consider there are grounds to decline the consent. The application would potentially create unacceptable traffic effects.
37. I note Mr Geddes’ summary of legal advice received, that with regard to “*existing infrastructure problems, ... an applicant ... should not add significantly to them*”.²⁸ The evidence clearly shows 50 truck and trailer movements per day would add significantly to existing issues on the Coast Road.
38. In his 48(a) Mr Collins shows a great deal more faith than I can in the ability of the TMP to ‘ensure’ drivers are educated and then drive accordingly.
39. In his 48 (b) I might share Mr Collins’ “*hope*” that truck drivers’ care and empathy, and adherence to road rules, will be increased through the TMP, but hope isn’t enough when death and serious injury is at stake.
40. All recommendations are dependent on the applicant’s willingness to adopt, implement and comply. Commissioners will be aware by now that many in the community do not have a high degree of trust in the applicant.

²⁵ Noted by Detective Scott Burrowes in a personal email 13 March 2024, acting in his capacity as a citizen and cyclist, not as a police representative

²⁶ *ibid*

²⁷ Mat Collins 47 p19

²⁸ Mark Geddes, email to Mat Collins, content forwarded to CRRG by Rasela Barrow 12 March 2024

41. Concerns continue regarding Council capacity to monitor the compliance of ever-increasing consent conditions, and regarding the burden that is likely to fall on a Community Liaison Group.
42. The concerns expressed by Mr Collins highlight that the infrastructure of SH6 is not of an adequate standard to safely accommodate its use as an industrial mine haulage route.²⁹ This is particularly significant as SH6 is the sole transport link for Coast Road communities, and users include all residents, pedestrians, cyclists and visitors to the region.
43. The application would potentially create unacceptable traffic effects.

²⁹ Since writing this response to Mr Collins' review, I have become aware that according to Mr Miller's supplementary statement at point 7 (d), the applicant's intention is to use 30-tonne trucks: "*currently-available 30t trucks were the selected vehicle for product haulage*". If the load remains at 30 tonnes as per the application, this amounts to 60 tonnes and is above the permitted maximum allowable on NZ highways.

APPENDIX A

The brief for Mr Collins from Mr Geddes, as sent to CRRG by the hearing administrator at our request.

From: **Rasela Barrow** <rasela.barrow@wrc.govt.nz>

Date: Tue., 12 Mar. 2024, 12:28 pm

Subject: Re: CRRG request: Mr Geddes' request for further information on transport

To: Coast Road Resilience Group <coastroadrg@gmail.com>

Good afternoon

Please see the below Brief (italicized) provided to Mr Collin's regarding the GDC S42A Reporting for RC-2023-0046.

This information is a direct request and is therefore at the discretion of CRRG and will not be published to the GDC Notified Consents page.

Please find below a brief for the peer review work. The client is Grey District Council. Please send a fee proposal through. It would be useful to have the work completed by 1 March 2024 or sooner.

Background:

TiGA Mineral and Metals have applied for resource consent to mine heavy metal concentrate on coastal site located at Barrytown in the Grey District, off State Highway 6 (the Coast Road).

There have been over 300 submissions some of which suggested that the proposal would give rise to adverse traffic, pedestrian and cyclist safety effects. One of the submitters produced video evidence at the hearing that illustrated a number of cars and trucks passing dangerously close to a cyclist. This can be found at:

[Notified Consents - Grey District Council \(greydc.govt.nz\)](https://www.greycouncil.govt.nz/Notified-Consents)

These effects are caused by existing deficiencies in the road. Legal advice attached confirms the general principle is that an applicant is not required to resolve existing infrastructure problems, neither should it add significantly to them. Accordingly, the key matter is whether the traffic resulting from the proposal will potentially create unacceptable traffic effects after considering the mitigation offered by the applicant. The below conditions have been proposed by the applicant to manage traffic effects. Transport evidence has been produced by Nick Fuller, along with a specific assessment of pedestrian/cyclist safety and a Traffic Management Plan.

Waka Kotahi made a submission (attached). After receiving some conflicting advice regarding traffic safety, they sent the e-mail attached.

Brief

- 1. Visit the proposed route and consider the safety issues.*
- 2. Peer review the applicant's traffic evidence.*
- 3. Provide a statement of evidence that summarises your peer review; any safety issues; any methods required to avoid, remedy or mitigate safety effects.*

Happy to discuss.

Kind regards,

12.1	<p>Trucking, mining, overburden and topsoil stripping, bund development and any related activities must shall not operate during the hours of darkness. For the purpose of this condition, hours of darkness are considered to be between 30 minutes after sunset to 30 minutes before sunrise.</p> <p>Advice Note: sunrise and sunset times can be found here https://www.sunrise-and-sunset.com/en/sun/new-zealand/westport/2023/june</p> <p>Advice Note: In addition to condition 12.1, further restrictions on transport operations are contained in Condition 15.0 Transport, and further noise restrictions are contained in Condition 16.0 Noise.</p>
12.2	<p>Processing plant and maintenance activities within the processing plant area may operate 24 hours a day/7 days a week.</p>
12.3	<p>Trucking activities must not occur on Sundays.</p>

14.0 Site Access	
14.1	<p>At least 10 working days prior to the trucking of Heavy Mineral Concentrate from the site, the vehicle crossing for access to the site from State Highway 6 must shall be formed in accordance with the vehicle crossing layout plans submitted by the consent holder and labelled as “T1001: Barrytown Mine, TiGa Minerals and Metals Ltd, Indicative Access Arrangement” stamped as approved by Grey District Council and dated [insert date of stamp here] dated 09/03/2023 and attached as Schedule 3.</p>
14.2	<p>Prior to vehicle crossing formation works occurring, the consent holder must shall submit to the Grey District Council a copy of the Waka Kotahi NZ Transport Agency’s approval to undertake works on the State Highway (as detailed in advice notes a - c).</p> <p>Advice Notes:</p> <p>a) It is a requirement of the Government Rounding Powers Act 1989 that any person wanting to carry out works on a state highway first gain the approval of Waka Kotahi NZ Transport Agency for the works and that a Corridor Access Request (CAR) is applied for and subsequently a Work Access Permit issued before any works commence. A CAR will be required for the vehicle crossing from the subject site to State Highway 6.</p> <p>b) Detailed design approval will be provided though the CAR process.</p> <p>c) A CAR is made online via www.beforeudig.co.nz and/or www.submitica.co.nz. The CAR needs to be submitted at least 15 working days before the planned start of works. A copy should also be sent to the Waka Kotahi NZ Transport Agency environmental planning team at environmentalplanning@nzta.govt.nz.</p> <p>The Corridor Access Request will need to include:</p> <ol style="list-style-type: none"> i. The detailed design for the vehicle crossing. In developing the detailed design, the consent holder will need to consult with the Waka Kotahi NZ Transport Agency, including the Regional Safety Engineer and Network Manager-appointed state highway maintenance contractor for the West Coast (Fulton Hogan) and a Waka Kotahi Safety Engineer (Jodie Enright). ii. A Construction Traffic Management Plan that has attained approval from the Waka Kotahi NZ Transport Agency Network Manager, appointed state highway maintenance contractor for the West Coast (Fulton Hogan) iii. A design safety audit which has been prepared, processed and approved in

	<p>accordance with Waka Kotahi guidelines for Road Safety Audit Procedures for Projects (https://www.nzta.govt.nz/assets/resources/road-safety-audit-procedures/docs/road-safetyaudit-procedures-tfm9.pdf)</p>
15.0 Transport	
15.1	<p>Truck movements <i>to or from the site must only travel south of the site, and associated with removal of heavy mineral concentrate to and from the South (towards Greymouth) of the site must be limited to 50 per day and 5 per hour (both averaged over a one week period) between the hours of 0500-2200 and must only occur during the hours of daylight. For the purpose of this condition, hours of daylight are considered to be between 30 minutes before sunrise and 30 minutes after sunset.</i></p> <p><i>Advice Note: For the purpose of the Transport conditions, a movement is defined as being a movement either to or from the site. A truck and trailer unit entering and leaving the site is therefore 2 movements. No more than 25 heavy vehicles will depart the site each day. Advice Note: Refer to Condition 12.0 for further restrictions on hours/days of operation.</i></p>
15.2	<p><i>Truck movements associated with removal of heavy mineral concentrate to and from the North (towards Westport) of the site must be limited to 50 per day and 5 per hour (both averaged over a one week period) between the period starting 30 minutes before sunrise and ending 30 minutes after sunset each day.</i></p> <p><i>Advice Note: For the purposes of the Transport conditions, a movement is defined as being a movement either to or from the site. A truck and trailer unit entering and leaving the site is therefore 2 movements.</i></p> <p><i>Advice Note: Sunrise and Sunset times will differ throughout the year, and are determined by sunrise and sunset times at Westport, which can be found at the following website: https://www.sunrise-and-sunset.com/en/sun/new-zealand/westport/2023/june</i></p>
15.3	<p>Truck movements associated with the <i>activity removal of heavy mineral concentrate must shall</i> be limited to no more than 3 per hour between 0500 and 0700 each day <i>so long as those hours are during the hours of daylight.</i></p> <p><i>Advice Note: For the purpose of the Transport conditions, a movement is defined as being a movement either to or from the site. A truck and trailer unit entering and leaving the site is therefore 2 movements.</i></p>
15.4	<p>Light vehicle movements must be limited to 140 light vehicles per day <i>and shall only occur during the hours of daylight</i></p> <p><i>Advice Note: For the purpose of the Transport conditions, a movement is defined as being a movement either to or from the site. A truck and trailer unit entering and leaving the site is therefore 2 movements.</i></p>
15.5	<p>A record of light and heavy vehicle movements <i>must shall</i> be kept by the Consent Holder and supplied to the Consent Authority on request.</p>
15.6	<p><i>Any signage adjacent to or directed towards State Highway 6 must comply with the Waka Kotahi NZ Transport Agency policy manual for Third Party Advertising Signs (2022) and the Grey District Plan rules.</i></p> <p><i>Advice note: Signage will not be permitted within the state highway corridor, unless approved by Waka Kotahi.</i></p>
15.7	<p>Truck movements associated with the removal of heavy mineral concentrate <i>must shall</i> not leave <i>or arrive at</i> the site between the hours of 0800-0900 08:30-0900 and 14:45-1600 15:00-15:30 each school day that the Barrytown Primary School bus is operating.</p>

	<p><i>Advice Note: For the purpose of the Transport conditions, a movement is defined as being a movement either to or from the site. A truck and trailer unit entering and leaving the site is therefore 2 movements.</i></p> <p><i>Advice note: School term dates can be found on the Ministry of Education’s website, however exact dates each school operate will vary and should be confirmed with the Barrytown School directly.</i></p>
15.8	<p><i>The consent holder must conduct transport activities in general accordance a Transport Management Plan. The objectives of the Transport Management Plan are: is to ensure all vehicles associated with the mining activity considerate and safe driver behaviour of.</i></p> <ul style="list-style-type: none"> <i>to ensure contribute to the safe and efficient operation of the road transport network between the Site and either the Port of Greymouth or the Port of Westport (as appropriate)</i> <i>to avoid adverse effects on wildlife along the trucking route;</i> <i>to avoid adverse effects on pedestrian and cycle safety along the trucking route.</i> <p><i>Advice Note: All Management Plans are required to adhere to the requirements of Condition 6.0.</i></p>
15.9	<p><i>The Transport Management Plan must shall include:</i></p> <ul style="list-style-type: none"> <i>A method of reporting incidents (including accidents or near misses involving a cyclist or pedestrian) encounters with taiko and other wildlife) and road defects;</i> <i>Hours of operation of various vehicle types to avoid adverse noise and traffic safety effects;</i> <i>A description of “locations of care” where drivers will need to take additional care, i.e. areas of tight road geometry, areas of greater pedestrian and cyclist concentration, areas near schools.</i> <i>Methods to minimise amenity disturbance for residents i.e. locations where use of air brakes should be avoided, including the Cargill Road intersection.</i> <i>A method of communication within the trucking fleet to avoid trucks passing at areas of tight geometry, and to alert other fleet drivers to the presence of a cyclist, pedestrian or other emerging safety hazards to minimise risks to other road users.</i> <i>Staff induction procedures, including briefing of drivers regarding considerate and safe driving behaviour, identified locations of care, and any other pertinent requirements regarding driver behaviour.</i> <i>Procedures to notify drivers when alterations are made to the TMP have occurred.</i>
15.10	<p><i>If any vehicles associated with the activity are involved in an incident, the Consent Holder must shall review the Transport Management Plan to determine what, if any, additional measures may need to be taken to avoid such incidents occurring in future.</i></p>
15.11	<p><i>Northbound trucks must communicate with other trucks within the HMC fleet prior to the passing bay immediately north of Nine Mile Creek, and must pull over and wait at the passing bay if there is a southbound truck approaching the tight road geometry section from Twelve Mile Bluff to the south side of Ten Mile Creek, and not progress further until the southbound truck has cleared the area.</i></p>
15.12	<p><i>In the event of a serious traffic incident (an accident involving an injury or fatality), the Consent Holder must notify the Consent Authority and engage a suitably qualified transport engineer to review the Transport Management Plan within 5 working days to identify any further mitigation measures that can be implemented to avoid similar incidents occurring again. The review and recommendations of the transport engineer must be provided to the Consent Authority within 10 working days of the incident occurring, and the management plan amendment process in Condition 6.0 must be followed.</i></p>

Mark Geddes
Director