

NZ Transport Agency Waka Kotahi Reference: Application 2025-0320

2 April 2025

West Coast Regional Council
PO Box 66
Greymouth 7840

Via email: tin.nguyen@wcr.govt.nz

Submission on Westland Mineral Sands Co. Ltd – 713 Ruatapu Road (State Highway 6), Mananui

Attached is the New Zealand Transport Agency Waka Kotahi (NZTA) submission on the application (Westland District Council reference RC240013) to construct, operate and maintain a mineral sand mine, including associated infrastructure and buildings over an area of approximately 112ha, at 713 Ruatapu Road (State Highway 6).

We welcome the opportunity to discuss the contents of our submission with the relevant council officers and the applicant, as required.

If you have any questions, please contact me.

Yours sincerely,



Charlotte Niederer
Intermediate Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services

Email: [REDACTED]

CC:

Westland Mineral Sands Co.
C/- Heather McKay
PO Box 1060,
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Via email: heather@wmsnz.com

FORM 13, SECTION 96, RESOURCE MANAGEMENT ACT 1991

Submission on application to construct, operate, and maintain a mineral sand mine –713 Ruatapu Road (State Highway 6), Mananui – Westland Mineral Sands Co. Ltd

To: West Coast Regional Council
PO Box 66
Greymouth 7840

Via email: tin.nguyen@wrc.govt.nz

From: NZ Transport Agency Waka Kotahi
Christchurch, Level 1, BNZ Centre,
120 Hereford Street,
PO Box 1479, Christchurch 8022

1. This is a submission on an application from Westland Mineral Sands Co. Limited to:

Construct, operate and maintain a mineral sand mine, including associated infrastructure and buildings over an area of approximately 112ha, located at 713 Ruatapu Road (State Highway 6 (SH6)). It is proposed that the mining operation would operate 24 hours a day, 7 days a week, with the applicant seeking a consent term of 16 years.

2. NZ Transport Agency Waka Kotahi (NZTA) could not gain an advantage in trade competition through this submission.**3. Role of NZTA:**

NZTA is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Roadings Powers Act 1989. The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by NZTA. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

4. State highway environment and context:

The application site directly adjoins SH6 and direct vehicle access to and from SH6 is proposed by the applicant. The western boundary of the application site, in its entirety, directly adjoins the state highway.

SH6 in this location has a posted speed limit of 100km/hr and has an average daily traffic count of 2,625 vehicles. This section of SH6 has also been declared a Limited Access Road (LAR) under the Government Roadings Powers Act 1989 (GRPA).

At present, there are currently three vehicle crossings/access points to the application site from SH6 despite the application only making reference to two. Two of these vehicle crossings/access points are authorised by NZTA, being Crossing Place 18 (gate access) and Crossing Place 19 (servicing the existing dwelling on the application site). A third vehicle crossing/access point is located at the southwestern corner of the application site and does not have an authorised Crossing Place. Refer to **Figure 1** below for the location of these vehicle crossings/access points.

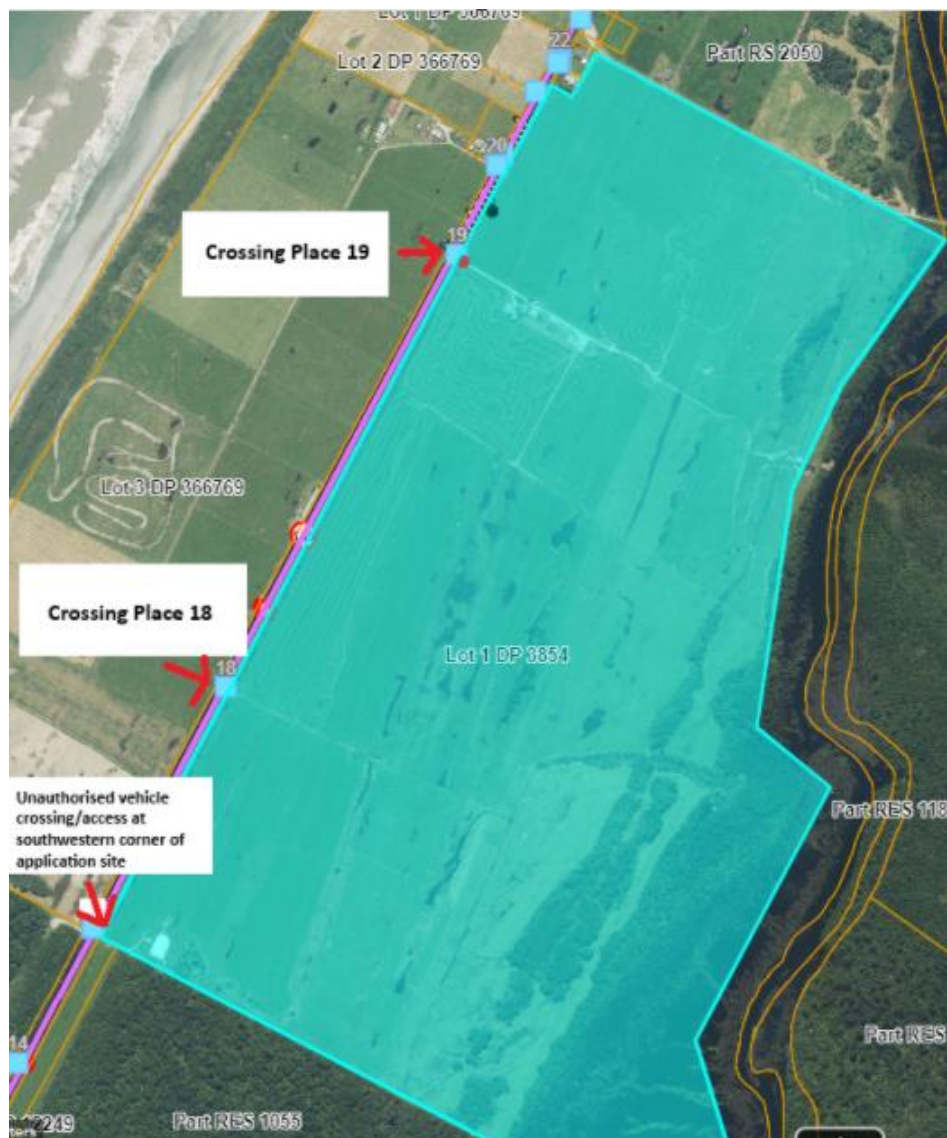


Figure 1: Location of authorised and unauthorised access to and from the application site onto SH6

5. The submission of NZTA is:

- (i) NZTA is opposed to the proposed mineral sand mine to the extent outlined in this submission.
- (ii) NZTA seeks for the applicant to provide more information to be able to assess the impacts on the state highway network and infrastructure. NZTA also considers that changes to the vehicle access to the site are required.

Vehicle access to and from SH6:

Access design:

- (iii) Vehicle access to the mine is proposed via a newly constructed access and includes a right-turn lane for vehicles entering the site from the south. While the applicants Integrated Transport Assessment (ITA) suggests that the design of the access has been developed in consultation with NZTA, it is important to note that discussions with NZTA were limited to preliminary advice and NZTA has not provided any feedback on the specific design of the vehicle access currently proposed and discussed in the ITA.
- (iv) Given the type and volume of traffic that would be using the vehicle access, NZTA considers that the access must, at a minimum, be designed as an intersection and must include a right-turn bay for vehicles entering the site from the south. However, NZTA also considers that the design of the vehicle access requires further consideration as it does not appropriately consider the standards and guidelines of NZTA for intersection design.
- (v) It is noted that the layout of the right-turn bay needs to meet the *Manual of traffic signs and markings (MOTSAM)- Part 2: Markings*. The preliminary design of the access also appears to be deficient with regards to, but not limited to, the taper lengths and minimum lane width requirements of 3.5m for state highways. Furthermore, as the mine is proposed to operate 24 hours a day and 7 days a week, NZTA consider the undertaking of a street lighting assessment at the site access with SH6 to be appropriate.
- (vi) For the above reasons, NZTA has concerns in relation to the design and operation of the access and the potential adverse effects the proposal may have on the safety and operation of the state highway network.

Timing of completion:

- (vii) NZTA requests that further clarification be provided on the timeframe around the completion of the vehicle access to the site prior to the commencement of the mining operation.
- (viii) It is noted that the applicant has included 'proposed conditions of consent' and Condition 14.1 states:

14.1 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 shall be formed in accordance with the vehicle crossing layout plans submitted by the consent holder and labelled as "Project Mananui Access Arrangement" attached as Att N Schedule 2 Access Diagram

- (ix) The above condition only requires the vehicle access to the site to be completed prior to the trucking of Heavy Mineral Concentrate from the site. NZTA considers further detail need to be provided on other potential site activity prior to the trucking of Heavy Mineral Concentrates offsite to assist with determining if the completion of the site access is required occur earlier to minimise adverse safety and efficiency effects on the state highway.

Closure of existing vehicle crossings/state highway access

- (x) The application states that the *'existing farmhouse access will be retained for residential and farming activities for the duration of the mining activity, to separate any ongoing farming activity traffic from the mine traffic. The southern farm access will be closed'* (page 27 of Assessment of Environmental Effects).

- (xi) The details provided with the application indicate that the vehicle access located in the southwestern corner of the application site (being the existing unauthorised access referred to in **Figure 1**) will be formally closed prior to the mining operation commencing. However, the application does not discuss the method proposed for the formal closure of this access, which is formed and sealed. NZTA requests that further detail on this be provided by the applicant. NZTA notes that the formal closure of this vehicle access must include the reinstatement of any fence line, grassed areas, berm, highway drainage or kerb. The reinstatement works must also be consistent with the adjacent road reserve treatment. The same consideration also needs to be given to authorised Crossing Place 18 (gate access onto SH6) which the application does not make any reference to.
- (xii) In relation to the northern vehicle access (existing Crossing Place 19) that will be retained to service the onsite dwelling in the short term, NZTA requests further clarification around the timing of its closure. Page 27 of the AEE notes that the northern access will be retained for the duration of the mining activity, but Condition 19.1 of the 'proposed conditions of consent' states that the northern bund will be constructed 'within 3 months of the settling ponds being excavated and prior to mining commencing'. Given the construction of the northern bund will physically block the existing SH6 vehicle access to and from the dwelling, the timing of the northern vehicle access closure, and whether there will be a period where the existing dwelling will require alternative access onto the state highway, needs to be clearer. Additionally, and similar to the other access closures, upon formal closure of the northern vehicle crossing servicing the dwelling appropriate reinstatement of the state highway road corridor must also be undertaken, and there is no discussion within the application as to what reinstatement work, if any, is proposed.

Stormwater Management:

- (xiii) The assessments provided by the applicant in relation to the management of stormwater do not appropriately assess potential adverse stormwater effects on SH6 and how stormwater will be appropriately managed. It is noted that there appears to be no mention of how stormwater runoff and/or drainage will be managed along the state highway boundary in general.
- (xiv) NZTA considers that a more detailed stormwater assessment which comments on the stormwater run-off to the state highway during the operation and following land reinstatement is required. The mining operation must not result in any additional stormwater run-off to the state highway and evidence needs to be provided to confirm this.

Lighting:

- (xv) It is noted in the application that light spill will not exceed 2 LUX on adjoining properties. However, it is not clear whether this includes the state highway road corridor. NZTA requests further clarification on the potential light spill effects onto SH6 in the form of a detailed lighting effects assessment considering any on-site lighting proposed over the duration of the mining operation.

6. NZTA seeks the following decision from the consent authority:

- (i) That the application is declined on the basis that the applicant has not sufficiently addressed impacts on SH6 and its infrastructure; or
- (ii) That clarification, further assessments and/or commitment is made by the applicant in relation to providing:

- a) An amendment to the design of the vehicle access to the application site that appropriately considers the standards and guidelines of NZTA for intersection design. This must be undertaken in consultation with NZTA.
- b) Further details and clarification on the timing of the northern and southern vehicle crossing/access closures, the reinstatement works proposed, and the consideration of appropriate conditions for reinstatement.
- c) An assessment of the potential stormwater effects on SH6, including details on how the stormwater runoff from the bunding and at the site access will be appropriately managed; and
- d) Further clarification on, and assessment of, the potential light spill and glare effects associated with onsite exterior lighting on SH6 road users.

7. **NZTA does wish to be heard in support of this submission.**
8. **If others make a similar submission, NZTA will consider presenting a joint case with them at the hearing.**
9. **NZTA is willing to work with the applicant in advance of a hearing.**

Signature:



Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services
Pursuant to an authority delegated by NZ Transport Agency Waka Kotahi

Date: 2 April 2025

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