

Before the Waikato Regional  
and Hauraki District Councils

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Under                      The Resource Management Act 1991

In the matter of        An application for resource consents to extend the Waihi Gold Mine  
via underground and open pit mining methods known as Project  
Martha

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**Statement of evidence of Joy Catherine Morse for the NZ Transport Agency – Planning**  
Dated 5 November 2018

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## **1 Qualifications and experience**

- 1.1 My full name is Joy Catherine Morse. I am employed as a Planner at KTB Planning Consultants Ltd, a planning consultancy based in Cambridge. I have held this position since March 2018. Prior to my current role I was employed by Waipa District Council as a consents planner.
- 1.2 I hold a Bachelor of Resource and Environmental Planning (Honours) from Massey University.
- 1.3 I have four years of experience in the field of resource and environmental planning which includes monitoring and consenting at a local government level, and preparing and processing resource consents for both private and local government clients.
- 1.4 My evidence relates to the NZ Transport Agency's (**'Transport Agency'**) submission on the resource consent application by Oceana Gold (New Zealand) Limited (**'Applicant'**) to extend the Waihi Gold Mine via underground and open pit mining methods known as Project Martha (**' the Proposal'**).
- 1.5 I was engaged by the Transport Agency prior to the Proposal being notified and was involved in the drafting of the Transport Agency's submission on the Proposal.

## **2 Code of Conduct**

- 2.1 Although this matter is not before the Environment Court, I confirm that I have been shown a copy of the Environment Court's Code of Conduct for Expert Witnesses, and have read that document. I confirm that I agree to comply with the Code of Conduct. I have outlined my expert qualifications above. I confirm that in this statement I address matters within my area of expertise and that I have undertaken sufficient research and data analysis to form the views and opinions that are expressed in my evidence. I confirm that I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

## **3 Scope of evidence**

- 3.1 My evidence addresses the following:
  - a. Actual and potential effects on the environment;
  - b. Statutory assessment;
  - c. Conditions; and
  - d. Conclusion.
- 3.2 In preparing my evidence, I have reviewed the application and accompanying material and those sections of the 42A Report relevant to the transportation network and the Transport Agency's submission.

- 3.3 I have reviewed and relied on the technical advice provided by Robert Swears, Consultant and Principal Road Safety / Transport Engineer at WSP OPUS. Mr Swears' advice to the Transport Agency on the transportation effects of the proposed development is included by way of a letter dated 5 November 2011, attached in Appendix B.
- 3.4 I have also reviewed the following statements of evidence filed on behalf of the Applicant:
- a. Richard Turner – planning; and
  - b. Ian Carlisle – transport engineering.
- 3.5 The proposed consent conditions in Appendix A utilise the consent proposed conditions circulated with the evidence by Richard Turner (Appendix A1) as a base document. The further amendments to the consent conditions that I am recommending, but which are not currently agreed with the applicant, are shown in tracking and strikethrough text in Appendix A. I discuss these matters further in this evidence below.

#### **4 Transport**

- 4.1 Mr Swears has raised concerns regarding the potential effects of the transportation of aggregate/backfill required for the Martha Underground Mine on local roads, including Baxter Road. Mr Swears considers it appropriate that the Applicant contribute on a pro rata basis to the maintenance costs for Crean Road. It is acknowledged that Crean and Baxter Road are local roads, however it is also noted that the Agency is a significant investor in the local roading network. In consideration of Mr Swears' expert advice, it is suggested that consideration is given to additional conditions covering the use of local roads other than Baxter Rd:

*100. At least two months prior to the commencement of haulage of aggregate for the manufacture of cement aggregate fill for backfilling the Martha Underground Mine, and haulage of other materials required for the consent holder's activities, the consent holder shall engage a suitably qualified road maintenance engineer to prepare a programme to record the condition of the existing road pavement, and the bridge, on Baxter Road and submit this assessment to the Council. This programme shall be submitted to the Council for approval before the assessment is conducted. The inspection and recording of the road pavement condition, and bridge condition, shall be undertaken in consultation with the Council's Transportation Manager.*

*104A In the event that the consent holder uses Hauraki District Council roads (apart from Baxter Road) for the cartage of the aggregate / backfill, the requirements of Conditions 100 to 103 shall also apply to those roads.*

- 4.2 Mr Swears also has concerns regarding the alternative routes which may be used for the transportation of aggregate/backfill required for the Martha Underground Mine in the event that the materials are not sourced from Waitawheta Quarry. In particular, Mr Swears is concerned that materials may be transported via intersections which may not be designed for the proposed use, resulting in adverse effects on traffic safety and efficiency. It is also noted that Mr Carlisle (Principal Transportation Engineer) in his evidence advises that if aggregate is to be sourced from elsewhere then further assessment is required. The means for this further assessment as suggested by Mr Carlisle, however, beyond notification to Council by way of Condition 104, is unknown. To address the need for further assessment if alternative routes are adopted, amendments to Condition 104 are proposed as follows:

*104 If the aggregate / backfill material required for the Martha Underground Mine is not sourced from the Waitawheta Quarry on McLean Road, the Council shall be advised at least one month prior to the commencement of the aggregate / backfill haulage activity of the location of the source of the material and the expected haulage routes and the vehicle configurations to be used for transporting the aggregate / backfill. The consent holder shall demonstrate to the Council that the proposed haulage route(s) will accommodate the proposed vehicle configurations without the vehicles crossing the centrelines and/or edge lines of the roads that comprise the haulage route. If the proposed haulage route (including intersections) cannot accommodate the proposed vehicle configuration, the consent holder shall upgrade the haulage route to the satisfaction of the Council to accommodate the proposed vehicle configuration. Where the haulage route includes a State Highway, the consent holder shall provide the Council with written confirmation from the NZ Transport Agency that the Transport Agency accepts the route proposed by the consent holder.*

- 4.3 Mr Swears has provided comment in regards to the wording of proposed condition 107. Amendments are required to clarify that the auditing requirements relate to the upgrade of the intersections of State Highway 2 with Baxter Road and Crean Road.
- 4.4 Mr Swears has advised that the following advice note which relates to the application of proposed conditions 107 to 110 is not worded so as to adequately mitigate the potential effects of vehicles larger than an 11 m rigid truck which may use the intersection of State Highway 2, Baxter Road and Crean Road. In consideration of Mr Swears' expert advice, it is considered appropriate that the following amendments be adopted:

**Advice note**

*Conditions 107 to 110 relate to the intersections of State Highway 2 with Baxter and Crean Roads. The proximity and configuration of these intersections (as at November 2018) make them unsuitable for heavy vehicles with a tracking curve wider than an 11 m long rigid heavy vehicle (e.g. multi-unit) to manoeuvre safely between the two. The conditions ~~do not~~ apply to travel utilising ~~only one or both the other~~ of the*

*intersections ~~but rather utilising both (i.e. exiting Crean Road and turning directly into Baxter Road, and vice versa).~~ and travelling in either direction through one or both of the intersections.*

- 4.5 Mr Swears has advised that *'if there are numerous vehicle movements and the intersections (and pavement and carriageway) associated with the haulage route cannot adequately accommodate those vehicles the adverse effects are likely to be more than minor'*. Mr Swears therefore considers it appropriate to apply Condition 108 to any other roads identified as part of the haulage route for aggregate / backfill. On the basis of Mr Swears advice, the following amendment to condition 108 is proposed.

108 *No heavy vehicles associated with the Martha Underground Mine that exceed one or more of the dimensions of the largest heavy vehicle configuration the intersection has been designed to accommodate in accordance with Condition 106 shall travel via Baxter Road, State Highway 2 and Crean Road (in either direction) following the intersection being upgraded in accordance with Condition 107. The requirements of this condition also apply to any other roads identified as part of the haulage route for aggregate / backfill and designed in accordance with Condition 104.*

- 4.6 Mr Swears has raised concerns that the current wording of condition 109 as he considers it may not adequately address all heavy vehicle movements associated with the activity. Mr Swears has advised that a Traffic Management Plan should relate to the range of vehicles and loads being transported to and from the Site to *'ensure adequate provisions are in place so that the transport of those loads does not result in more than minor adverse effects'*. On this basis the following amendments to condition 109 are proposed:

109 *The consent holder shall submit a Traffic Management Plan for the haulage of aggregate to the site for the manufacture of cement aggregate fill for backfilling the Martha Underground Mine and the haulage of other materials to or from the site to the Hauraki District Council for certification at least 20 working days prior to the haulage of aggregate first occurring. The Traffic Management Plan shall provide details of at least the following*

- a. Imported material source locations;*
- b. Exported material destination locations;*
- c. Heavy vehicle transport routes;*
- d. Daily and peak hour traffic volumes;*
- e. Driver inductions;*
- f. Maximum size vehicles to be utilised;*
- g. Measures to managed peak departure traffic to minimise loss of service; and*
- h. Process for review of the Traffic Management Plan.*

- 4.7 Given that Mr Swears considers it appropriate that Condition 109 be imposed to avoid adverse traffic effects, it is reasonable that a condition be adopted to ensure that the

activity is carried out in accordance with an approved Traffic Management Plan. On this basis the following condition is proposed:

109A This consent shall not be exercised contrary to a Traffic Management Plan approved in accordance with Condition 109.

- 4.8 Mr Swears has advised that it is appropriate for the applicant to maintain a log for the purposes of collecting records of heavy vehicles travelling to and from the Martha Underground Mine. This is to ensure Council are able to identify issues relating to heavy vehicle movements, including transport safety, efficiency or damage to the road pavement. I agree with Mr Swears' comments that the information collected will assist with monitoring and demonstrating compliance with the relevant transport conditions. Conditions 109B and 109C have been drafted in consultation with Mr Swears and is set out below:

109B The consent holder shall maintain a log for the duration of this consent which records details on the following which are associated with the Martha Underground Mine:

- a. Daily heavy vehicle movements at the intersection of State Highway 2 with Baxter Road and Crean Road;
- b. The time of the aforementioned vehicle movements; and
- c. The origin and destination of those heavy vehicles using the State Highway 2, Baxter Road and Crean Road intersection.

109C The consent holder shall make the log required by Condition 109B available to the Hauraki District Council within ten working days of a request being received.

In consideration of the expert advice provided by Mr Swears, in the absence of the conditions I have described, I do not consider the adverse effects of the activity will be appropriately avoided, remedied or mitigated.

## **5 Statutory assessment**

As a Non-Complying Activity, section 104B of the RMA (1991), states that council:

- *may grant or refuse the application; and*
- *if it grants the application, may impose conditions under section 108.*

In consideration of the expert advice provided by Mr Swears in relation to those actual and potential effects of the proposal on the safety and efficiency of the transportation network, it is considered appropriate that these proposed conditions included in my evidence (Appendix A) be adopted.

## **6 Conclusion**

- 6.1 Overall, based on the technical advice provided by Mr Swears, it is my opinion that the consent conditions attached as Appendix A to my evidence are appropriate to mitigate adverse effects on the transport network, in particular:
- a. Those conditions 100 to 103 which relate only to local roads. These are conditions suggested in light of the investment the Transport Agency makes towards the local road network affected by the Proposal; and
  - b. Conditions 104 to 113 are considered necessary to avoid potential adverse effects on the state highway network (for which the Agency is the controlling Authority) associated with the movement of aggregate/backfill required for the Martha Underground Mine.
- 6.2 The Transport Agency seeks that the application only be approved on the basis of those conditions (or similar) included in Appendix A of my evidence, being adopted.

A handwritten signature in blue ink that reads "Joy Morse". The signature is written in a cursive, flowing style.

Joy Morse  
**PLANNER**