

## Your Comment on the Waihi North application

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to [substantive@fasttrack.govt.nz](mailto:substantive@fasttrack.govt.nz)

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	New Zealand Transport Agency		
First name	Nicola		
Last name	Foran		
Postal address			
Home phone / Mobile phone		Work phone	
Email ( <i>a valid email address enables us to communicate efficiently with you</i> )			

2. We will email you draft conditions of consent for your comment			
<input checked="" type="checkbox"/>	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct

**Thank you for your comments**

# MEMORANDUM OF THE NEW ZEALAND TRANSPORT AGENCY WAKA KOTAHI ON THE WAIHI NORTH PROJECT

25 August 2025

## 1.0 Introduction

- 1.1 This memorandum presents the assessment undertaken by the NZ Transport Agency Waka Kotahi (**NZTA**) of the substantive application for the Waihi North Project (**Application**) (reference 2504-1046), submitted by Oceana Gold (New Zealand) Limited (**OceanaGold**) under the Fast-Track Approvals Act 2024 (**FTAA**).
- 1.2 NZTA appreciates the opportunity to comment on the Application.
- 1.3 The assessment has been prepared in response to an invitation from the Expert Panel (**the Panel**) to provide comment and includes a summary of preliminary findings relating to transportation and geotechnical matters only.
- 1.4 This assessment is based on the Application materials submitted to the Environmental Protection Authority (**EPA**).

## 2.0 Background

- 2.1 NZTA has had previous pre-application engagement with OceanaGold in August 2021, March to June 2022, and January to February 2025.
- 2.2 NZTA corresponded with OceanaGold and Stantec Limited (Stantec) on the development of Area 1 - Wharekirauponga Underground Mine in early 2022. The correspondence at this time were in relation to the State Highway 25 and Willows Road intersection. As part of these comments, NZTA addressed the need for an intersection upgrade to appropriately accommodate the anticipated increase in vehicle movements because of the proposed development.
- 2.3 The initial concerns raised were regarding restricted sight distances using the left-turn lane within the intersection, queuing at the intersection during peak hours, and the speed of through-vehicles following left-turning vehicles into the State Highway 25/Willows Road intersection.
- 2.4 Following previous engagement with the Applicant in 2021 and 2022, it was recommended that the following measures be included as part of any subsequent application:
- The detailed design of the proposed intersection upgrade is required to be reviewed and approved by NZTA prior to construction.
  - The intersection upgrade design being subject to an independent detailed design and NZTA Safety Audit Procedures.
  - The inclusion of street lighting at the upgraded intersection.
  - The provision of a 2.5m wide Diagram E left-turn shoulder and inclusion of a Right Turn Bay treatment.

- 2.5 In January 2025, OceanaGold lodged a Corridor Access Request (CAR) for the completion of four pavement pits. It is noted that the purpose of this work was to determine aspects of the detailed design of the State Highway 25 and Willows Road intersection upgrades.
- 2.6 Following a review of the relevant technical assessments, NZTA can confirm that the applicant has addressed and incorporated the previous feedback within their application regarding transportation related matters.

### **3.0 Assessment of proposal on NZTA's network and assets**

- 3.1 NZTA's interest in the Application is confined to the robustness of the relevant technical reports submitted and to ensure that transport and geotechnical effects, particularly those that relate to the state highway network, are adequately managed.
- 3.2 NZTA wishes to comment on the following matters:
- The proposed intensification of traffic movements at the intersection between State Highway 25 and Willows Road, and the subsequent intersection upgrades;
  - The proposed Wharekirauponga Access Tunnel (Area 3) and the works associated with this beneath sections of State Highway 2 and State Highway 25; and
  - The proposed services trench/corridor within Area 4 - Services Trench (Area 4) in relation to NZTA infrastructure

#### **State Highway 25 and Willows Road Intersection**

- 3.3 Upon review of the Traffic Impact Assessment (TIA) prepared by Stantec and dated 19/02/2025 NZTA has identified the following key matters in relation to transportation:

##### *Sight distances*

- 3.4 As identified within the TIA, the State Highway 25/Willows Road intersection has a forward sight distance of approximately 120 m around the inside of the curve adjacent to the intersection due to vegetation / embankment. Under the current Austroads Guide to Road Design Part 4A Table 3.2, the correct Safe Intersection Sight Distance for a 96 km/h operating speed is approximately 234 m. It has also been acknowledged within the TIA that southbound drivers have similarly restricted visibility to right turning vehicles from Willows Road as they accelerate to the south of the intersection. As it has been addressed, this may be a concern for slow moving and heavy vehicles when accelerating.
- 3.5 To address this concern, NZTA supports the TIA recommendation to consider additional benching or batter cutting along State Highway 25 to improve visibility, while maintaining safety for the services trench corridor.

##### *Traffic Count Data*

- 3.6 The TIA has addressed the anticipated traffic volumes for the following areas:
- The State Highway 25 and Willows Road intersection;
  - The anticipated daily vehicle movements for Area 1 – Wharekirauponga Underground Mine (Area 1);
  - The peak hourly vehicle movements between the Park and Ride carparking facility on Kenny Street in the Waihi township and Area 1;
  - And the anticipated weekly heavy vehicle movements as a result of the proposal.

- 3.7 As addressed in the TIA, NZTA understands that during some hours of the day vehicle movements on the State Highway 25 have been recorded at approximately 400 vehicles per hour. Although right turn movements into Willows Road are anticipated to be minimal, it is understood that the 100km/h speed environment and traffic movements on the state highway warrant a Right Turn Bay. Therefore, NZTA considers and agrees that the intersection shall be upgraded, and a right turn bay be provided in accordance with the requirements contained within the New Zealand Transport Agency Traffic Control Devices Manual Part 4 (Intersections) Version 1 December 2020 Section 15 (including Figure 15.5 “Markings for right turn bays in rural areas”).
- 3.8 As a result of the proposal, vehicle movements are anticipated to increase at the intersection, however, vehicle movements through the intersection are expected to remain relatively low on average following the completion of the intersection upgrade. Majority of the vehicle movements will consist of arrivals to, and departures from, Area 1, Area 2 - Willows Road Farm, and the Kenny Street Park and Ride area in the Waihi township. Upon assessment of the traffic volumes modelled in the TIA, and potential sight distance issues as addressed in Section 4.2, NZTA has concluded that a formal left-turn lane is not warranted.

#### **Required Intersection Upgrade**

- 3.9 NZTA considers that the Right-Turn Bay treatment will aid to sufficiently manage traffic movements within the vicinity of the intersection, as outlined in the TIA. Based on the modelled traffic volumes and potential safety implications as a result of the increase in vehicle movements at the intersection, NZTA wishes to reiterate that the intersection is required to be sufficiently upgraded to the satisfaction of NZTA.
- 3.10 To mitigate the concerns addressed above, NZTA considers that amendments to proposed Condition 73 as outlined in ‘PROPOSED CONDITIONS COMMON TO THE HAURAKI DISTRICT COUNCIL AND WAIKATO REGIONAL COUNCIL RESOURCE CONSENT’ (**Proposed Conditions**) are required to ensure that NZTA’s concerns, as outlined above, are included within the detailed design for the SH25 and Willows Road intersection.
- 3.11 Prior to any construction within the state highway corridor, the consent holder is legally required to apply to NZTA for a Corridor Access Request and for that request to be approved. On this basis, NZTA consider an advice note shall be included within the proposed conditions to address this requirement.
- 3.12 NZTA considers that additional amendments are also required to proposed condition 72 to ensure that the intersection upgrade has been completed to the satisfaction of NZTA following the completion of works.
- 3.13 Due to the nature and intensity of the works associated with an intersection upgrade, NZTA considers that the Applicant shall prepare and submit a Temporary Traffic Management Plan (TTMP) to NZTA and Hauraki District Council a minimum of 40 working days prior to the commencement of works associated with the upgrade. NZTA therefore seeks that a condition to be included to address this matter within the Proposed Conditions.
- 3.14 Refer to Section 4.0 for further information regarding the amendments and additions as addressed above.

#### **Wharekirauponga Access Tunnel**

- 3.15 Upon review of the substantive application documentation, it is noted that the technical assessments provided do not provide explicit confirmation, or adequate investigation into the effects of the Access Tunnel, and associated works, on NZTA infrastructure. Given that the proposed works are substantial in nature, NZTA considers that assessment, management and monitoring of these constraints will be vital in suitably informing NZTA and further protecting NZTA assets.
- 3.16 Mining and tunnelling operations near to State Highway 2 and State Highway 25 may induce surface and pavement deformations through several mechanisms. Dewatering operations of surface features

and tunnels, and mechanical settlement due to drill and blast mining operations of the Access Tunnel are key drivers in subsequent impacts on NZTA infrastructure.

**3.17** As it has been reviewed, the EGL Settlement Report has identified key mitigations for future works associated with the Application. NZTA understands the identified mitigation measures have been proposed and will further be given effect to as part of the future works associated with the Application. These have been summarised as follows:

- Minimum tunnel depths to be 130 m from the surface, which is approximately 40 m below the interface with younger volcanics to reduce likelihood of dewatering shallow deposits.
- Specific geotechnical and hydrogeological investigations and assessments along the alignment.
- Drilling to be done away from key structures/infrastructure to avoid associated settlement risk.
- Fully grouting all surface-drilled holes to below andesite levels.
- Monitoring of groundwater levels and ground settlement to detect possible effects.
- Develop of a Trigger Action and Response Plans (TARPS).
- Mitigation of groundwater inflows into the tunnelled areas.
- Re-injection of water back into the ground to minimise effects of dewatering to surrounding area.
- Continue monitoring settlements as part of Resource Consent 124860

**3.18** NZTA note that the applicant has addressed dewatering and settlement monitoring plans within the Proposed Conditions. As addressed under proposed condition C44, the purpose of this is to ensure that tunnelling and mining activities do not cause surface instability or differential settlement that could damage infrastructure not owned by the Consent Holder. NZTA is supportive of the inclusion of the proposed condition to prevent dewatering and settlement adversely affecting NZTA infrastructure.

**3.19** The inclusion of proposed condition C46 refers to the reporting of the dewatering and settlement monitoring plan. Effects and risks are to be appropriately identified, and further independently peer reviewed to ensure that appropriate assessments, mitigations and monitoring has been prescribed. NZTA deem that if effects and risks affecting NZTA infrastructure have been identified, this information should be provided to NZTA. Therefore, it is considered that C46 shall be amended to ensure this reporting is shared with infrastructure owners. Please refer to Section 4 for the proposed amendments.

**3.20** Conditions C50-C58 also address the need for a peer review panel to provide independent advice to the consent holder to ensure the appropriate assessments, mitigations and monitoring has been prescribed. NZTA consider it necessary for independent peer reviews to be undertaken by technical specialists as intended and therefore support Conditions C50-C58.

**3.21** NZTA notes that the applicant has proposed to install additional settlement markers and piezometers for structures not owned by the Applicant. It is understood that additional settlement markers and a piezometer may be within the general vicinity of the state highway. It is considered that the final location of any proposed additional monitoring piezometer will need to be reviewed and approved by NZTA prior to their establishment. If the proposed location is within the state highway corridor, the consent holder is legally required to apply to the New Zealand Transport Agency for a Corridor Access Request (CAR) and for that request to be approved. This can be covered as an advice note and is included in the following section.

### **Service trench**

- 3.22** It is noted that underground services associated with the development are proposed to cross State Highway 25 in at least one location with installation of services to be done through horizontal thrusting. It is noted that the applicant has addressed in the Application that a minimum 1.5m cover is recommended from the top of service to ground level. A CAR is also required for this work.

## **4.0 Proposed resource consent conditions and required amendments**

- 4.1** NZTA has reviewed the document submitted titled 'PROPOSED CONDITIONS COMMON TO THE HAURAKI DISTRICT COUNCIL AND WAIKATO REGIONAL COUNCIL RESOURCE CONSENT' and considers that further amendments are required to various resource consent conditions to address the concerns raised.

- 4.2** Proposed Amendments to Condition 72:

*The Consent Holder must upgrade Willows Road and the intersection of State Highway 25 and Willows Road at its cost in accordance with Conditions 73 and 74:*

- a. Prior to heavy vehicle movements as measured at the entrance to the Willows SFA reaching greater than 40 vehicle movements per day; or*
- b. No later than six months after any construction activity listed in Condition 6 begins in Area 2; whichever occurs first.*

*The Consent Holder must:*

- c. Submit final designs for the upgrades to the Hauraki District Council for certification that they meet the requirements of Conditions 73 and 74 prior to commencing the upgrade works, including the results of the independent design safety audits required by Conditions 73 and 74; and*
- d. Provide documentary evidence that the upgrades certified under (c) have been completed to the satisfaction of Hauraki District Council and the New Zealand Transport Agency within 1 month of the upgrades being completed.*

*The Consent Holder must maintain a log of vehicles at the Area 2 access gate for the first six months of construction or until the upgrades required by this condition are complete, whichever occurs first. The vehicle log must be provided to the Hauraki District Council on request.*

- 4.3** Proposed Amendments to Condition 73:

~~*Unless the New Zealand Transport Agency provides written confirmation that one or both of these upgrades is not required, the*~~ *The detailed design of the upgrade of to the intersection of State Highway 25 and Willows Road must include the following:*

- a. A right turn bay into Willows Road from SH25 which meets the minimum requirements of the New Zealand Transport Agency Traffic Control Devices Manual Part 4 (Intersections) Version 1 December 2020 Section 15 (including Figure 15.5 "Markings for right turn bays in rural areas") or any subsequent version of the guideline (in which case the latter prevails) and meets the New Zealand Transport Agency requirements for forward visibility; and*
- b. Widening the left turn shoulder into Willows Road from SH25 to 2.5 m in accordance with Diagram E in the NZTA Planning Policy Manual version 1 2007 or any subsequent version of that standard (in which case the latter prevails).*
- c. Street lighting located on both sides of the State Highway 25 and in accordance with the requirements of the New Zealand Transport Agency M30 Specifications and Guidelines for*

Road Lighting Design or any subsequent version of that standard (in which case the latter prevails).

- d. Pavement edges that are shaped or seal to avoid drop-offs and long-term maintenance issues.
- e. Shoulder treatments and tie-ins that extend beyond the intersection limits to mitigate early failure.
- f. Protection or relocation of Powerco poles (if required).
- g. Confirmation that the chipseal is sufficient for turning lanes over a 25-year design life or, alternative treatment to the satisfaction of the New Zealand Transport Agency Network Manager.
- ~~b.~~ h. Stormwater and drainage details including mechanisms to prevent edge scouring and batter slumping.
- i. Confirmation that any geometric re-alignment of the state highway is in accordance with the approved technical documentation for land transport network related activities listed within the New Zealand Transport Agency standards and guidelines register for land transport.

The design of the proposed upgrade of the intersection between SH25 and Willows Road must be subject to an independent design safety audit and post construction safety audit in accordance with the New Zealand Transport Agency Safe System Audit Guidelines 2022 or any subsequent version of the guideline (in which case the latter prevails). Those audits are to be carried out by safety auditors experienced in highway intersection design, appointed in consultation with the New Zealand Transport Agency. Any changes recommended as a result of the safety audits, including design changes and post construction changes, must be implemented by the Consent Holder provided they are agreed to by the Hauraki District Council and the New Zealand Transport Agency.

#### 4.4 Proposed Condition to be included:

At least 40 working days prior to the commencement of the activities authorised as part of the upgrade to the intersection between State Highway 25 and Willows Road, the consent holder must submit a Temporary Traffic Management Plan (TTMP) prepared by a suitably qualified and experienced Traffic Engineer to Hauraki District Council and New Zealand Transport Agency for certification. The TTMP must be in accordance with the New Zealand Guide for Temporary Traffic Management and be implemented for the duration of the construction works being undertaken on the intersection of State Highway 25 and Willows Road.

#### 4.5 Proposed Advice Note to be included:

Before the commencement of any physical work on the state highway, including the upgrade of the intersection between State Highway 25 and Willows Road, the consent holder is legally required to apply to the New Zealand Transport Agency for a Corridor Access Request (CAR) and for that request to be approved. The consent holder is to submit the CAR application via the Submitica portal ([www.submitica.com](http://www.submitica.com)) a minimum of fourteen working days prior to the commencement of any works on the state highway; longer is advised for complex works. The New Zealand Transport Agency and Hauraki District Council-approved TTMP must be submitted as part of the CAR application.

#### 4.6 Proposed Amendments to Condition 46:

In the event that monitoring undertaken in accordance with the Dewatering and Settlement Monitoring Plan shows that:

- a. A tilt greater than 1 in 1,000 occurs between any two network monitoring locations and that tilt affects infrastructure or buildings on land not owned by the Consent Holder; or

*b. There is a significant variance from the predicted settlement rates in that Plan; or*

*c. Dewatering results in adverse impacts on aquifer systems such that existing authorised groundwater supplies used for domestic, stock or other purposes are adversely impacted;*

*Within 20 days of receiving the results of the monitoring, the Consent Holder must provide a written report to the Councils that includes:*

- I. An explanation of the cause of the tilting or adverse effect on groundwater abstraction point(s);*
- II. Proposed contingency measures to remedy or mitigate the adverse effect, including the timing for implementation of those measures;*
- III. The steps the Consent Holder proposes to take in order to prevent any further occurrence of the situation; and*
- IV. Evidence that the results of the monitoring have been provided to the owners of any infrastructure or buildings adversely affected.*

*The Consent Holder must implement any contingency measures identified in the report within the stated time limit.*

## **5.0 Conclusion**

- 5.1** NZTA appreciates the Applicant including some of the relevant transport matters that NZTA had addressed as part of prior engagement, however, it is considered that further amendments and conditions are required.
- 5.2** NZTA supports the intent of the proposed conditions, however, NZTA seeks that the Panel include the conditions and advice notes as proposed within Section 4.0 (a clean copy is contained within the appendices attached). It is considered that the proposed amendments and inclusions are necessary to ensure that NZTA is suitably informed of transport and geotechnical matters, and NZTA assets are suitably protected within the general vicinity of the proposal.
- 5.3** NZTA welcomes further discussions with OceanaGold regarding the intersection upgrades at State Highway 25 and Willows Road.



**Appendix One: State Highway 25 and Willows Road Intersection Consent Conditions**

<i>Willows Road Upgrades</i>		
72	<p>The Consent Holder must upgrade Willows Road and the intersection of State Highway 25 and Willows Road at its cost in accordance with Conditions 73 and 74:</p> <ul style="list-style-type: none"> <li>a. Prior to heavy vehicle movements as measured at the entrance to the Willows SFA reaching greater than 40 vehicle movements per day; or</li> <li>b. No later than six months after any construction activity listed in Condition 6 begins in Area 2; whichever occurs first.</li> </ul> <p>The Consent Holder must:</p> <ul style="list-style-type: none"> <li>c. Submit final designs for the upgrades to the Hauraki District Council for certification that they meet the requirements of Conditions 73 and 74 prior to commencing the upgrade works, including the results of the independent design safety audits required by Conditions 73 and 74; and</li> <li>d. Provide documentary evidence that the upgrades certified under (c) have been completed to the satisfaction of Hauraki District Council and the New Zealand Transport Agency within 1 month of the upgrades being completed.</li> </ul> <p>The Consent Holder must maintain a log of vehicles at the Area 2 access gate for the first six months of construction or until the upgrades required by this condition are complete, whichever occurs first. The vehicle log must be provided to the Hauraki District Council on request.</p>	
73	<p>The detailed design of the upgrade of the intersection of State Highway 25 and Willows Road must include the following:</p> <ul style="list-style-type: none"> <li>a. A right turn bay into Willows Road from SH25 which meets the minimum requirements of the New Zealand Transport Agency Traffic Control Devices Manual Part 4 (Intersections) Version 1 December 2020 Section 15 (including Figure 15.5 “Markings for right turn bays in rural areas”) or any subsequent version of the guideline (in which case the latter prevails) and meets the New Zealand Transport Agency requirements for forward visibility; and</li> <li>b. Widening the left turn shoulder into Willows Road from SH25 to 2.5 m in accordance with Diagram E in the NZTA Planning Policy Manual version 1 2007 or any subsequent version of that standard (in which case the latter prevails).</li> <li>c. Street lighting located on both sides of the State Highway 25 and in accordance with the requirements of the New Zealand Transport Agency M30 Specifications and Guidelines for Road Lighting Design or any subsequent version of that standard (in which case the latter prevails).</li> <li>d. Pavement edges that are shaped or seal to avoid drop-offs and long-term maintenance issues.</li> <li>e. Shoulder treatments and tie-ins that extend beyond the intersection limits to mitigate early failure.</li> </ul>	

	<p>f. Protection or relocation of Powerco poles (if required).</p> <p>g. Confirmation that the chipseal is sufficient for turning lanes over a 25-year design life or, alternative treatment to the satisfaction of the New Zealand Transport Agency Network Manager.</p> <p>h. Stormwater and drainage details including mechanisms to prevent edge scouring and batter slumping.</p> <p>i. Confirmation that any geometric re-alignment of the state highway is in accordance with the approved technical documentation for land transport network related activities listed within the New Zealand Transport Agency standards and guidelines register for land transport.</p> <p>The design of the proposed upgrade of the intersection between SH25 and Willows Road must be subject to an independent design safety audit and post construction safety audit in accordance with the New Zealand Transport Agency Safe System Audit Guidelines 2022 or any subsequent version of the guideline (in which case the latter prevails). Those audits are to be carried out by safety auditors experienced in highway intersection design, appointed in consultation with the New Zealand Transport Agency. Any changes recommended as a result of the safety audits, including design changes and post construction changes, must be implemented by the Consent Holder provided they are agreed to by the Hauraki District Council and the New Zealand Transport Agency.</p>	
Proposed Condition	<p>At least 40 working days prior to the commencement of the activities authorised as part of the upgrade to the intersection between State Highway 25 and Willows Road, the consent holder must submit a Temporary Traffic Management Plan (TTMP) prepared by a suitably qualified and experienced Traffic Engineer to Hauraki District Council and New Zealand Transport Agency for certification. The TTMP must be in accordance with the New Zealand Guide for Temporary Traffic Management and be implemented for the duration of the construction works being undertaken on the intersection of State Highway 25 and Willows Road.</p>	

#### Proposed Advice Notes:

1. Before the commencement of any physical work on the state highway, including the upgrade of the intersection between State Highway 25 and Willows Road, the consent holder is legally required to apply to the New Zealand Transport Agency for a Corridor Access Request (CAR) and for that request to be approved. The consent holder is to submit the CAR application via the Submitica portal ([www.submitica.com](http://www.submitica.com)) a minimum of fourteen working days prior to the commencement of any works on the state highway; longer is advised for complex works. The New Zealand Transport Agency and Hauraki District Council-approved TTMP must be submitted as part of the CAR application.

**Appendix Two: Wharekirauponga Access Tunnel Consent Conditions**

<b>Reporting</b>		
<b>C46</b>	<p>In the event that monitoring undertaken in accordance with the Dewatering and Settlement Monitoring Plan shows that:</p> <ul style="list-style-type: none"> <li>a. A tilt greater than 1 in 1,000 occurs between any two network monitoring locations and that tilt affects infrastructure or buildings on land not owned by the Consent Holder; or</li> <li>b. There is a significant variance from the predicted settlement rates in that Plan; or</li> <li>c. Dewatering results in adverse impacts on aquifer systems such that existing authorised groundwater supplies used for domestic, stock or other purposes are adversely impacted;</li> </ul> <p>Within 20 days of receiving the results of the monitoring, the Consent Holder must provide a written report to the Councils that includes:</p> <ul style="list-style-type: none"> <li>I. An explanation of the cause of the tilting or adverse effect on groundwater abstraction point(s);</li> <li>II. Proposed contingency measures to remedy or mitigate the adverse effect, including the timing for implementation of those measures;</li> <li>III. The steps the Consent Holder proposes to take in order to prevent any further occurrence of the situation; and</li> <li>IV. Evidence that the results of the monitoring have been provided to the owners of any infrastructure or buildings adversely affected.</li> </ul> <p>The Consent Holder must implement any contingency measures identified in the report within the stated time limit</p>	