

Lighting and Visual Amenity Management Plan

Buller Plateaux Continuation Project

August 2026

BPCP-ENV-PLN-018 Rev0

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Glossary of Terms and Abbreviations

Term	Definition
ACML	Ancillary Coal Mining Licence
AEO	Authority to Enter and Operate
AWP	Annual Work Plan
Bathurst	Bathurst Resources Limited, including its subsidiary companies BT Mining Ltd, Bathurst Coal Ltd, and Buller Coal Ltd
BPCP	Buller Plateaux Continuation Project
BPO	Best Practicable Option
BDC	Buller District Council
BDP	Buller District Plan
Buller Plateaux	A collective reference to the Stockton Plateau and Denniston Plateau
Candelas	A unit of measurement for luminous intensity, describing how much visible light is emitted by a source in a specific direction.
CML	Coal Mining Licence
DoC	Department of Conservation
EMS	Environmental Management System
ESE	Escarpment Extended Project sub-area
FTAA	Fast-track Approvals Act 2024
HSEC	Health, Safety, Environment and Community
K	Kelvin, the unit used to describe the colour temperature of light, indicating whether light appears warm (yellow/orange tones at lower K values) or cool (blue-white tones at higher K values).
km	Kilometres
LDP	Leading Design Professionals
LVAMP	Lighting and Visual Amenity Management Plan
Lux	Unit of measurement for illuminance, which describes how much visible light falls on a given surface area. For example, 1 lux = the illuminance of a surface one metre away from a light source emitting 1 lumen evenly across that square metre.
m	Metre
MLT	Mobile Lighting Tower
MFS	Mount Frederick South Project sub-area
MP	Mining Permit
Peer Review Panel	An independent group of qualified experts convened to critically assess the technical quality, validity, and appropriateness of the Project's methodologies, findings, and/or management plans.
RMM	Rough Milne Mitchell Landscape Architects
SEMP	Site Environmental Management Plan
SEP	Stakeholder Engagement Plan
SH67	State Highway 67
SSE	Site Senior Executive
TARP	Trigger Action Response Plan

Term	Definition
The Project	The Buller Coal Plateaux Continuation Project
TTPP	Te Tai o Poutini Plan
UWHR	Upper Waimangaroa Haul Road (a Project sub-area)
WCRC	West Coast Regional Council

1.0 Introduction

1.1 Purpose

Bathurst Resources Limited (including its subsidiary companies BT Mining Ltd, Bathurst Coal Ltd, and Buller Coal Ltd, and joint venture BT Mining Ltd) (Bathurst) are seeking approvals through the Fast-track Approvals Act 2024 (FTAA) for the Buller Plateaux Continuation Project (BPCP, or the Project).

This Lighting and Visual Amenity Management Plan (also referred to as the “Plan”, or LVAMP) outlines the objectives, risks, management controls, responsibilities, and training requirements for managing lighting and visual amenity effects associated with the Project.

For the purposes of this Plan, “visual” refers to visual amenity effects associated with the visibility and perception of lighting within the landscape, including how lighting is experienced from surrounding viewpoints in the context of landform, vegetation, distance, baseline darkness, and existing mining activity.

This Plan applies to the Stockton Mine, Mount Frederick South (MFS), Escarpment Extended (ESE), and the Upper Waimangaroa Haul Road (UWHR). Cypress and Ngākawau are excluded and are not subject to any requirements or obligations under this Plan. Ngākawau Coal Handling Facility lighting, including any Dole Street receiver management, monitoring basis and TTPP exception response, is to be managed through the applicable separate operational control or management mechanism and cross-referenced in the relevant site documentation.

This Plan has been prepared in accordance with the recommendations from the following assessments:

- *BPCP, Existing Infrastructure - Assessment of Environmental Effects – Lighting*, by Leading Design Professionals (LDP), 2026;
- *BPCP, Proposed Infrastructure - Assessment of Environmental Effects – Lighting*, by LDP, 2026; and
- *BPCP Landscape Assessment Report*, by Rough Milne Mitchell Landscape Architects (RMM), 2026.

1.2 Objectives and Scope

The objectives of this Plan are to:

- Avoid, remedy, or mitigate adverse lighting and visual amenity effects during construction, operation, rehabilitation, and closure;
- Protect residential amenity, landscape character, recreational values, and night-sky values across the Buller Plateaux;

-
- Ensure lighting effects remain consistent with the findings of the Landscape and Recreation Assessments, including cumulative effects;
 - Avoid or minimise adverse effects on motorists and recreational users;
 - Achieve compliance with consent conditions, district planning provisions, and AS/NZS 4282:2023 - Control of the Obtrusive Effects of Outdoor Lighting; and
 - Provide a framework for monitoring, review, and adaptive management.

2.0 Project Description

2.1 Overview

Bathurst is a publicly listed New Zealand coal mining company with a focus on people and long-term environmental sustainability. Bathurst is New Zealand's largest coal mining company, who proposes to mine approximately 20 million tonnes of coal over a 25-year period as part of the Project.

The Project is located on the Stockton Plateau and the Denniston Plateau (collectively referred to as the Buller Plateaux), approximately 15 kilometres (km) northeast of Westport on the West Coast of the South Island.

The Project area includes a combination of Bathurst-owned land, Crown land, and private land, and encompasses both existing and proposed mining areas. Mining activities currently occur within several Coal Mining Licence (CML), Mining Permit (MP), and ancillary coal mining licence (ACML) boundaries that collectively form part of the operational footprint of the Project.

The proposed Project consent boundary is shown in **Figure 1**.

2.2 Operations

The Project involves coal extraction across multiple operational areas on the Stockton and Denniston Plateaux, linked by the UWHR, which enables coal and equipment to be transported from Denniston to Stockton for processing. Mining activities are undertaken on a continuous basis, and include coal extraction, overburden removal, material placement, rehabilitation works, coal transportation and routine maintenance of haul roads and infrastructure.

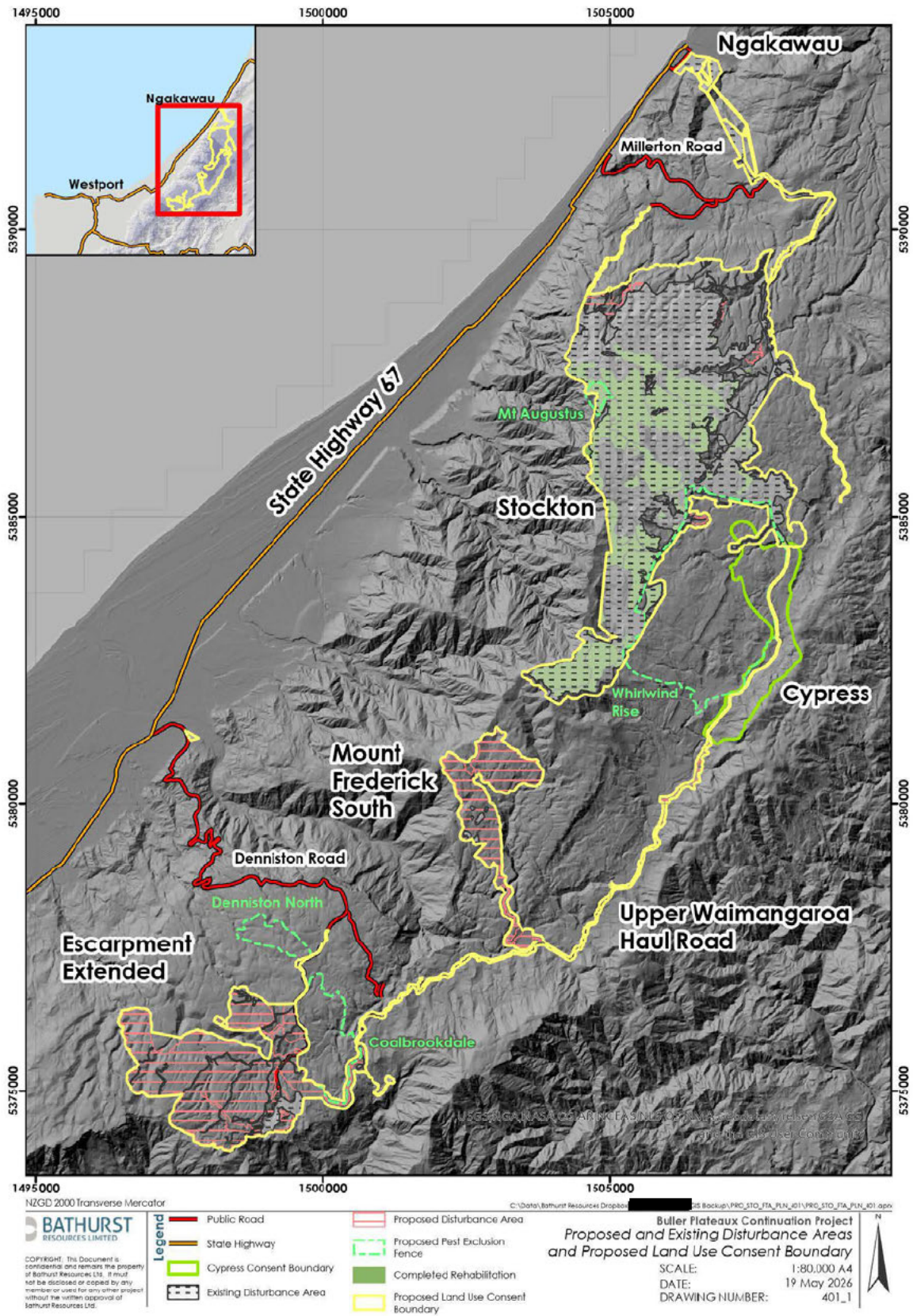


Figure 1: Proposed and Existing Disturbance Areas and Proposed Land Use Consent Boundary for the Project

2.3 Lighting

This section describes the additional lighting proposed as part of the Project, separate from existing lighting conditions described in **Section 3.0**.

2.3.1 Stockton

Lighting at Stockton will largely continue to utilise existing permanent and mobile lighting infrastructure associated with established mining operations at the Stockton Mine. Stockton North is recognised as a distinct management sub-area where the currently dark baseline and potential mobile-lighting visibility toward Millerton, Granity, Ngākawau and Hector will be considered in controls, monitoring and TARP implementation. There will be no substantial expansion of permanent lighting beyond existing operational areas.

Lighting at Stockton will continue to comprise:

- Permanent lighting associated with coal handling and processing areas, workshops, offices, crib facilities, adit and site access points; and
- Intermittent use of mobile lighting towers and lighting on mobile plant and vehicles to support active work areas and internal haul routes.

Figure 2 shows the existing permanent lighting infrastructure at Stockton which will remain in place as part of the Project.

2.3.2 Escarpment Extended (ESE)

Lighting at ESE will support 24-hour mining and associated infrastructure operations.

Permanent operational lighting will be provided at:

- The central infrastructure area (now including the gatehouse and administration area);
- Coal handling, stockpile and loadout areas (coal infrastructure area); and
- Explosives facilities.

Figure 3 shows the location of this infrastructure and does not depict individual lights.

Permanent lighting will comprise lights mounted on buildings and fixed infrastructure, and free-standing lighting poles (generally up to approximately 8 metres (m) in height, and up to approximately 12 m at coal stockpile and loadout areas).

Temporary or intermittent operational lighting will include mobile lighting towers used as required at active mining faces, stockpile areas and other locations where lighting demand varies with operational activity.

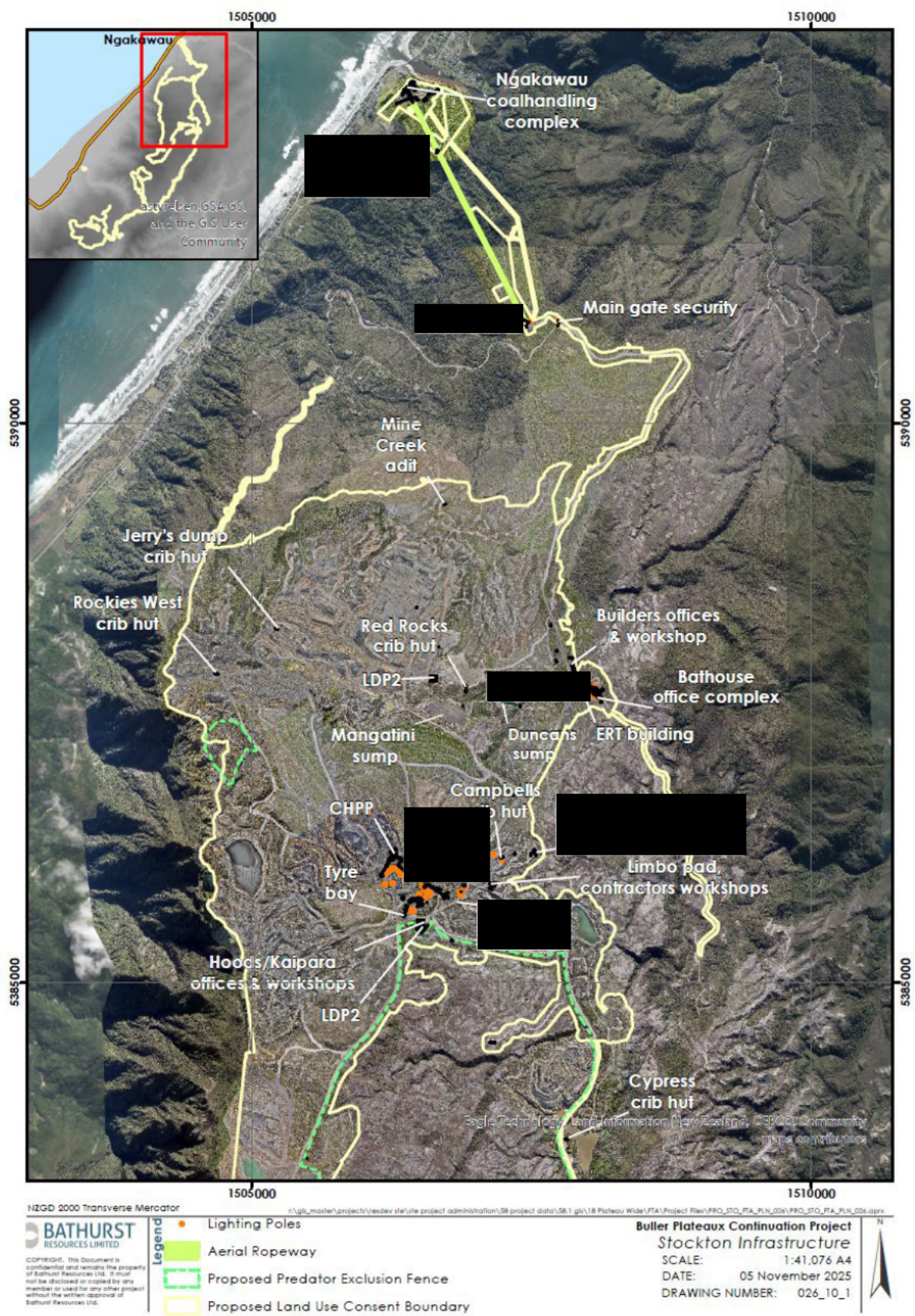


Figure 2: Existing permanent lighting infrastructure at Stockton



Figure 3: ESE Infrastructure

2.3.3 Upper Waimangaroa Haul Road (UWHR)

The UWHR will include limited lighting associated with haulage operations and safety critical locations.

Permanent operational lighting will be limited to discrete locations, including:

- The MFS haul road intersection (as shown in **Figure 4**); and
- No other permanent lighting nodes are proposed unless supported by a technical assessment basis, location constraints, and management controls consistent with this Plan.

No continuous lighting is proposed along the length of the haul road.

Temporary or intermittent operational lighting will include:

- Vehicle-mounted lighting associated with haulage and service vehicles; and
- Mobile lighting used on an as-needed basis for operational activities.

2.3.4 Mount Frederick South (MFS)

MFS will include lighting associated with mining and supporting infrastructure.

Permanent operational lighting will comprise a combination of building-mounted luminaires and free-standing lighting poles which will be provided at:

- The water treatment plant;
- Coal stockpile and transfer areas; and
- Crib facilities and minor support infrastructure.

This infrastructure is shown in **Figure 4**.

Temporary or intermittent operational lighting will include mobile lighting towers used as required in active mining and material handling areas where lighting demand changes over time.

The MFS water treatment plant is expected to operate 24 hours per day, seven days per week during mining and for approximately eight years after mining operations are complete, and this duration forms part of the rehabilitation and closure lighting management envelope.

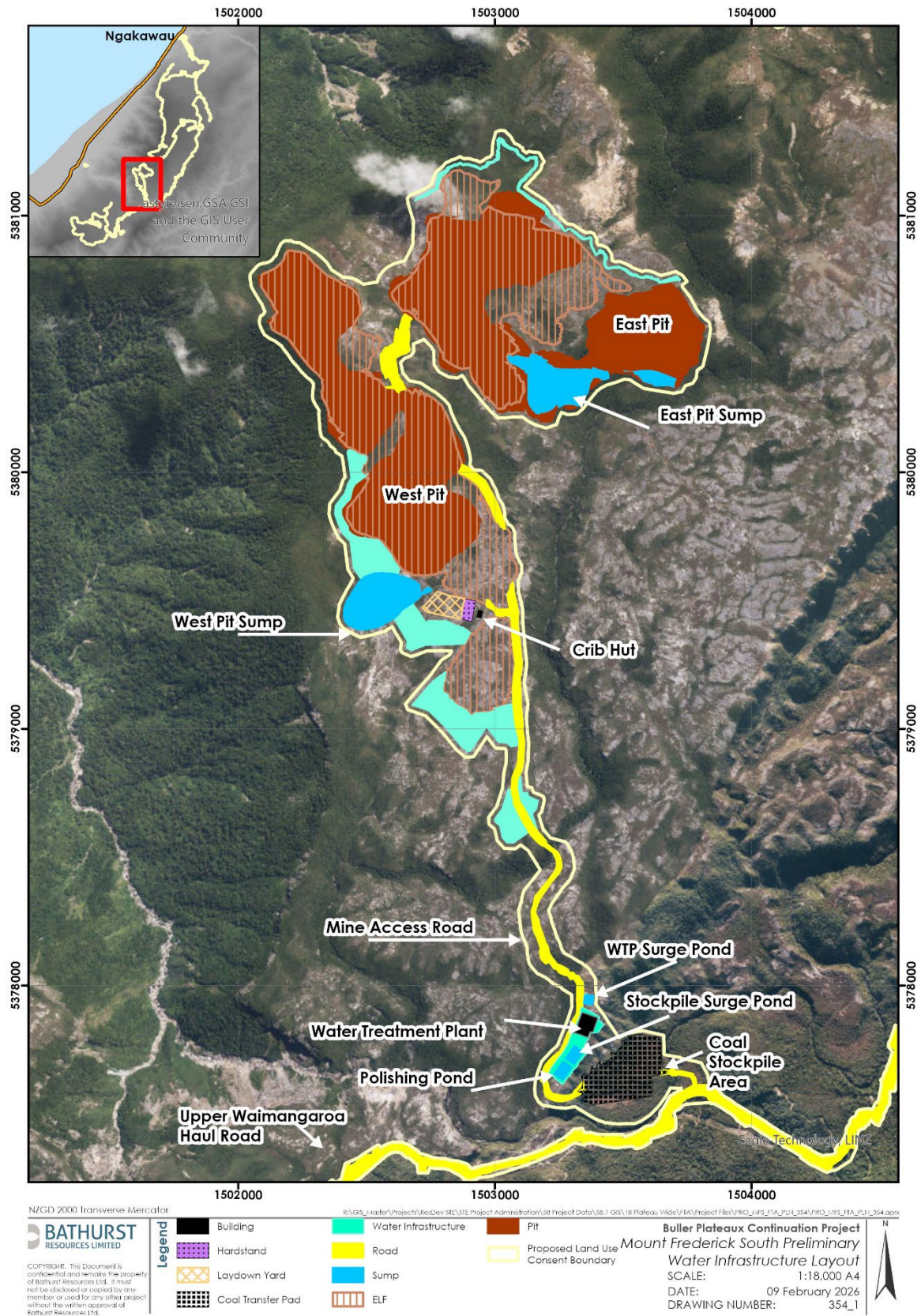


Figure 4: UWHR and MFS Infrastructure

3.0 Environmental Setting

3.1 Receiving Environment

The Buller Plateaux are characterised by elevated plateaux, steep escarpments, and incised valleys, with extensive indigenous vegetation cover across much of the landscape. The scale and ruggedness of the landforms, together with vegetation and separation distances, play a significant role in limiting views between mining areas and surrounding settlements.

Beyond established mining infrastructure, night-time ambient lighting levels are generally low. There is little to no public street lighting across the Stockton and Denniston Plateaux, and natural darkness is a defining characteristic of the wider environment, contributing to landscape character and recreational experience.

Within this context, existing mining activity at Stockton represents the primary source of artificial lighting in the receiving environment. The degree to which lighting is perceptible beyond operational areas is influenced by topography, vegetation, orientation, and distance.

3.2 Sensitive Receivers

Sensitive receivers relevant to lighting and visual amenity include:

- [REDACTED]
- Users of public roads, including Millerton Road, State Highway 67 (SH67) and local roads; and
- Recreational users of the Denniston and Stockton Plateaux and surrounding areas, where night-time darkness contributes to amenity.

The sensitivity of these receivers varies depending on proximity, orientation, elevation, and existing background lighting conditions. Denniston is recognised as a particularly sensitive receiver due to its elevated position, dark baseline environment, and the potential for direct visibility of lighting associated with MFS and ESE in certain locations.

3.3 Existing Lighting and Visual Environment

3.3.1 Stockton

Existing lighting at Stockton comprises permanent lighting associated with established buildings and infrastructure, intermittent use of mobile lighting towers, and lighting on mobile plant and vehicles. Permanent lighting is located around coal handling and processing areas, workshops, offices, crib facilities, adit and site access points (refer to **Figure 3**).

Permanent lighting at Stockton is generally sparse and oriented to illuminate operational areas rather than the surrounding landscape. Due to the elevated plateau setting, steep escarpments and

intervening vegetation, permanent lighting is largely contained within the site when viewed from surrounding areas.

Mobile lighting towers are used intermittently to support active work areas and internal haul routes. Occasional use of mobile lighting may occur near the north-western edges of the Stockton Plateau, where elevated positions increase the potential for distant visibility to the west and north-west.

3.3.2 Escarpment Extended (ESE)

The ESE area includes the Cascade Mine, which is currently under care and maintenance. There is no permanent operational lighting currently installed or operating within the ESE area as part of the existing environment.

Night-time conditions across the ESE area are characterised by natural darkness, with low ambient light levels typical of the Denniston Plateau. Any artificial lighting under existing conditions is limited to temporary or mobile sources associated with infrequent, short-duration activities such as site inspections, maintenance or care-and-maintenance works, or vehicle movements, rather than fixed infrastructure.

3.3.3 Upper Waimangaroa Haul Road (UWHR)

The existing environment within the corridor where the UWHR is proposed is characterised by undeveloped land with low ambient night-time lighting levels. Night-time conditions are dominated by natural darkness, with no permanent artificial lighting present.

3.3.4 Mount Frederick South (MFS)

The MFS area does not contain permanent operational lighting. Night-time conditions are characterised by natural darkness, with low ambient lighting levels typical of the surrounding Stockton Plateau.

Any artificial lighting under existing conditions is limited to temporary or mobile sources associated with infrequent access or inspection activities, rather than fixed infrastructure.

4.0 Statutory Requirements

This Plan has been prepared to address the statutory requirements relevant to lighting and visual amenity effects associated with the BPCP, to support the FTAA application.

This Plan identifies the applicable legal framework, consent requirements, and standards and guidelines relevant to the management of lighting and visual amenity effects during Project operations.

4.1 Legal Framework and Consent Requirements

Consent requirements that are relevant to this Plan are listed below in **Table 1**.

Table 1: Consent conditions relevant to this Plan

Condition no.	Condition description	Reference in Plan

Consent conditions to be inserted upon issue of the final decision.

4.2 Standards and Guidelines

The standards and guidelines relevant to the management of lighting and visual amenity effects for the Project as summarised in Table 2. These documents provide the technical framework for measurement, assessment, risk management, and implementation of mitigation measures under this Plan.

Table 2: Standards and guidelines relevant to this Plan

Plan / Standard	Relevance to this Plan
Buller District Plan (BDP)	Sets out the objectives, policies, rules and standards for managing land use activities within the Buller District, including controls relating to lighting, glare and effects on amenity and transport safety.
Te Tai o Poutini Plan (TTPP)	The combined district plan for the Buller, Grey and Westland Districts. It provides updated objectives, policies and rules relevant to outdoor lighting, including quantitative light spill limits and assessment methods applicable to rural and dark-sky environments.
AS/NZS 4282:2023 – Control of the Obtrusive Effects of Outdoor Lighting	Provides the primary technical standard for assessing and managing obtrusive lighting effects, including light spill, glare (Threshold Increment), upward light and sky glow. This standard underpins the lighting assessment methodology and informs the design, placement and performance criteria for both permanent and temporary lighting.

5.0 Stakeholder Consultation

A draft of this management plan was supplied to relevant regulators as part of the FTAA pre-consultation engagement.

The stakeholder consultation regarding associated technical reports and this management plan has been summarised in the Stakeholder Consultation section of the BPCP FTAA main application.

Once this management plan is approved, this section will document all future stakeholder engagement undertaken for subsequent versions.

6.0 Management Approach

This section outlines the risk-based approach adopted by Bathurst to manage lighting and visual amenity effects associated with the Project. The approach integrates existing operational practices, consent requirements, monitoring, and management responses to minimise adverse effects and achieve compliance.

Risk management is undertaken in accordance with the Bathurst Health, Safety, Environment, and Community (HSEC) Framework and the *Bathurst-HST-STD-001 Risk Management Standard*.

6.1 Sources and Effects

The potential risks to lighting and visual amenity associated with the Project have been identified through consideration of the location, scale and operation of lighting in relation to sensitive receivers. Particular regard has been given to the Denniston Plateau, where elevated topography, low baseline lighting levels and potential line-of-sight exposure to MFS and ESE may increase sensitivity to lighting effects. The outcomes of this assessment are summarised in Table 3.

Table 3: Key risks associated with lighting and visual amenity

Source (caused by)	Potential effect (risk)
Permanent lighting at operational infrastructure (Stockton, ESE, MFS)	Localised visibility of lighting beyond operational areas, largely mitigated by separation distances, landform screening and orientation of luminaires. The degree of effect varies by location: - At Denniston, some fixed infrastructure lighting (particularly at MFS and ESE) may be more noticeable due to elevation and exposure, with potential effects in the moderate to high range where visibility occurs; - At Millerton, effects are expected to be low to moderate; and - Elsewhere, effects are expected to be negligible to low.
Mobile lighting towers used intermittently for specific activities	Temporary night-time visual change due to elevated or moving light sources, including short duration increases in perceived scale or prominence of works. At Denniston, mobile lighting towers positioned near exposed edges or oriented toward residential viewpoints may result in more noticeable glare or amenity effects if unmanaged. Effects are intermittent and reversible.
Lighting on mobile plant	Transient night-time visual effects associated with moving light sources, including momentary visibility from elevated viewpoints or along access routes. Effects are short-lived and low in magnitude.
Introduction of new illuminated infrastructure in currently unlit areas	Change to night-time landscape character through the introduction of artificial lighting into areas currently characterised by natural darkness.
Cumulative night-time lighting across operational areas	Incremental change to overall night-time visual amenity where multiple lighting sources are visible. Cumulative effects may be more noticeable from elevated viewpoints at Denniston where multiple operational areas are within view.

6.2 Management and Mitigation Measures

Lighting and visual amenity effects associated with the Project will be managed through a combination of lighting design, operational controls, equipment selection, monitoring, and response procedures.

The mitigation measures set out below are designed to minimise effects at source, manage the location and timing of lighting, and support compliance with applicable consent conditions, district planning provisions, and AS/NZS 4282:2023 – Control of the Obtrusive Effects of Outdoor Lighting. These measures are intended to manage lighting so that spill light at adjoining occupied residential dwellings and public roads does not exceed 10 lux (horizontal or vertical). Enhanced attention will be given to areas where lighting may be more noticeable due to elevated topography and low baseline lighting conditions, including the Denniston Plateau.

The following measures will be implemented to manage lighting and visual amenity effects associated with the Project:

- Application of best practicable option (BPO) principles in the design, installation and operation of all lighting, including:
 - Limiting lighting to that required for safe access and operations;
 - Selecting luminaires appropriate to the task and environment; and
 - Avoiding unnecessary duplication or over-lighting;
- Use of lighting design and layout to minimise off-site visibility, including:
 - Orienting lights downward and toward work areas;
 - Avoiding direct views of luminaires from public roads and residential areas where practicable; and
 - Using landform, infrastructure layout and vegetation to provide screening;
 - Giving particular regard to potential visibility from elevated receivers, including Denniston, when locating and orienting lighting;
- Selection of lighting equipment to reduce obtrusive effects, including:
 - Use of warm-white lighting with a nominal colour temperature of less than 2700 Kelvin (K);
 - Limiting luminous intensity and upward light emission in accordance with AS/NZS 4282:2023 – Control of the Obtrusive Effects of Outdoor Lighting; and
 - Avoiding lighting with unnecessary blue-rich spectral output where practicable;
- Management of operational activities to minimise night-time visual effects, including:
 - Switching off lights when not in use;
 - Limiting the duration and extent of mobile lighting in visible locations;
 - Avoiding illumination of areas not in active use wherever reasonably practicable;

- Applying additional operational controls where lighting may be visible from Denniston, including careful positioning and orientation of mobile lighting towers and minimising use near exposed edges where practicable; and
- Implementing vehicle lighting controls in accordance with **Section 6.2.4**.

6.2.1 Construction and De-construction Lighting

The Project will involve construction and de-construction activities associated with the establishment, modification and eventual removal of infrastructure. These activities may occur at any time, consistent with the continuous (24 hours per day, 7 days per week) nature of existing and proposed operations. Whilst most works will be undertaken during daylight hours, night-time works may be required in certain circumstances, including during winter months, for safety reasons, or where activities are time critical.

Where night-time works are undertaken, temporary lighting may be used to support safe access and operation. This may include mobile lighting towers, lighting on construction plant, and temporary task lighting, with the extent and duration dependent on the activity.

De-construction activities at the end of the operational life of Project areas will be similar in nature and will use comparable temporary lighting where required, with all such lighting managed in accordance with this Plan.

6.2.2 Mobile Lighting

Mobile lighting towers and temporary lighting are used intermittently to support specific operational, maintenance or construction activities. To manage potential visual and amenity effects and minimise spill light so that it does not exceed 10 lux (horizontal or vertical) at adjoining occupied residential dwellings and public roads, the following measures will be implemented:

- Mobile lighting towers will be:
 - restricted to a maximum height of 12 m;
 - not directly aimed at residences in accordance with LIG2;
 - positioned and oriented to minimise spill light to residences and public roads where practicable;
 - positioned and oriented to minimise spill light at sensitive receivers; and
 - used only for the duration necessary to complete the relevant activity;
- The number of mobile lighting towers operating concurrently will be minimised where practicable;
- Lighting towers will be removed or relocated once activities are complete to avoid unnecessary night-time illumination; and

- Where mobile lighting is required in locations potentially visible from Denniston, lighting orientation and placement will be reviewed as part of routine inspections to confirm effectiveness of mitigation measures.

6.2.3 Fixed Lighting

Fixed lighting associated with permanent infrastructure will be designed and operated to minimise visual and lighting effects beyond operational areas and to limit spill light so that it does not exceed 10 lux (horizontal or vertical) at adjoining occupied residential dwellings and public roads. Mitigation measures include:

- Limiting fixed lighting to that required for safe access, security and operational needs;
- Directing all fixed luminaires downward with zero upward tilt;
- Use of warm-white lighting with a nominal colour temperature of less than 2700 Kelvin (K);
- Lighting directed downward, with no upward tilt and no more than 1% direct upward light emission; and
- Integrating lighting with infrastructure design and site layout to reduce prominence in the surrounding landscape.

Alternatively, where these measures cannot reasonably be achieved, lighting may instead be selected so that its maximum luminous intensity in any direction does not exceed 1,000 candelas.

6.2.4 Vehicle and Mobile Plant Lighting

Vehicle and mobile plant lighting will be managed to minimise potential night-time visual effects while maintaining safety, including:

- Vehicles using the UWHR and operating within the Project Area will use dipped headlights wherever it is safe to do so;
- Vehicles using public roads on the Denniston Plateau will use dipped headlights wherever it is safe to do so;
- Avoidance of unnecessary use of high-beam or auxiliary lighting; and
- Vehicle-mounted flashing safety light will not be used on public roads.

7.0 Monitoring

Monitoring is undertaken to verify compliance with consent conditions, assess the effectiveness of mitigation and management measures, and provide early identification of potential lighting and visual amenity issues. Monitoring outcomes inform operational decision-making and, where relevant, activation of the Trigger Action Response Plan (TARP) (see **Section 8.0**).

Lighting and visual monitoring under this Plan is implemented in accordance with applicable consent conditions (see **Section 4.1**), relevant standards (see **Section 4.2**), and Bathurst's established monitoring procedures. Where lighting may be visible from elevated or sensitive receivers, including Denniston, monitoring will also consider the effectiveness of orientation, placement and operational controls in managing visibility and amenity effects.

7.1 Compliance Monitoring

Lighting compliance monitoring will be undertaken where required to demonstrate compliance with applicable planning provisions, standards and consent conditions, including:

- Following receipt of a substantiated lighting or visual amenity complaint;
- Where there is a change to lighting design, location, or operational use that has the potential to alter off-site lighting effects, including:
 - Installation of new fixed lighting;
 - Relocation or reorientation of lighting; or
 - Changes to lighting type, height, intensity or duration of use;
- Following commencement of new or modified lighting at MFS or ESE, where lighting may be visible from sensitive receivers, including Denniston, to verify predicted effects and confirm effectiveness of mitigation measures;
- Where monitoring is required to confirm compliance at a site boundary or at representative locations near sensitive receivers; or
- Where otherwise required to demonstrate compliance with consent conditions.

Where undertaken, lighting compliance monitoring will:

- Be conducted by suitably qualified and experienced personnel;
- Be carried out in accordance with AS/NZS 4282:2023 – Control of the Obtrusive Effects of Outdoor Lighting;
- Consider relevant operational, environmental and site conditions at the time of monitoring; and
- Measure parameters relevant to the potential effect being assessed (e.g. vertical illuminance, glare, or upward light).

Monitoring results will be assessed against the consented limits.

7.2 Routine Inspection

Routine inspections support the proactive management of lighting and visual amenity effects across the Project area.

Inspections will be undertaken on a monthly basis within operational areas in accordance with the Monthly Environmental Inspection Checklist. Inspections will be conducted by suitably trained Bathurst personnel and will:

- Assess the effectiveness of mitigation measures;
- Identify lighting installations and mobile lighting in use;
- Confirm that lighting is oriented, operated and maintained in accordance with this Plan;
- Identify unnecessary, poorly directed or malfunctioning lighting;
- Consider lighting and visual amenity related factors, including the effectiveness of screening, infrastructure siting and rehabilitation, and review any lighting or visual amenity related observations; and
- Where relevant, consider potential visibility from elevated viewpoints (including Denniston) and confirm that mobile lighting towers are appropriately positioned and oriented.

Inspection findings will be communicated to site personnel through toolbox talks or other appropriate forums. Additional inspections may be undertaken in response to changes in activities, installation of new lighting, or substantiated community complaints.

8.0 Trigger Action Response, Incidents and Complaints Management

This Plan is supported by a TARP that provides a structured, risk-based approach for responding to lighting and visual amenity related incidents, operational observations, and community complaints associated with the Project. The TARP supports timely identification and management of lighting and visual amenity risks by linking observed issues to proportionate response actions, and integrates with Bathurst's existing incident and complaints management systems.

In areas where lighting may be more noticeable due to elevated topography and low baseline lighting conditions, including Denniston, the TARP provides for enhanced review of lighting orientation, placement and operational controls where observations or complaints arise.

Triggers for response may arise from routine inspections or operational observations, lighting and visual amenity related incidents or near-misses, community complaints, or changes in lighting and visual amenity conditions during construction. Changes to lighting design, location or operation will also be managed through Bathurst's change management processes, where applicable.

Response actions are implemented in accordance with the trigger levels and actions set out in Table 4.

Table 4: Trigger Action Response Plan (TARP)

Trigger	Action
Level 1 - Observation or Minor Issue	
Isolated lighting or visual amenity observations identified during inspections, or minor or unsubstantiated complaints, with no material amenity or safety effects.	- Review lighting configuration, orientation and operational controls; - Reinforce lighting and visual amenity management procedures with relevant personnel, where required; - Implement minor adjustments to management measures if necessary (e.g. reorientation, dimming, shielding or switching off lighting when not required); - Where relevant, confirm that mobile lighting towers are appropriately positioned and oriented relative to elevated receivers, including Denniston; - Confirm lighting is being operated in accordance with consent requirements, including orientation, shielding and operational need; - Notify relevant site management and environmental personnel; and - Document findings and actions taken in safety management system (i.e. INX).
Level 2 – Repeated Issue or Substantiated Complaint	
Repeated Level 1 triggers or substantiated complaints indicating increased visual amenity effects, obtrusive light spill, glare, or lighting inconsistent with this Plan or consent requirements, including complaints from Denniston relating to visibility or glare.	- Implement corrective actions to address the identified issue (e.g. changes to lighting type, location, height, orientation, timing or intensity); - Undertake targeted inspections or monitoring to confirm effectiveness; - Undertake compliance checks against relevant consent conditions, including light spill (10 lux limit), MLT height and orientation, and fixed lighting requirements; - Where relevant, undertake targeted review from representative viewpoints (including Denniston) to verify mitigation effectiveness; - Notify relevant internal management and, where appropriate, affected stakeholders; and - Investigate and document root causes, action and outcomes.

Trigger	Action
Level 3 – Significant Lighting or Visual Amenity Incident	
A significant lighting or visual amenity issue, including confirmed non-compliance, material adverse effects on residential amenity or motorist safety, or a situation requiring regulatory notification, including sustained or widespread effects at sensitive receivers.	• Undertake a detailed investigation and review of management practices; • Modify or suspend relevant activities where required to prevent further risk; • Undertake formal compliance assessment against consent conditions to confirm extent of non-compliance; • Implement incident or emergency response procedures in accordance with site systems; • Notify regulators and relevant authorities as required; and • Document outcomes and implement additional mitigation before affected activities recommence, where appropriate.

8.1 Complaints Management

Bathurst will maintain a Community Complaints Register to record all complaints relating to lighting and visual amenity.

In the event of a complaint, Bathurst will:

- Acknowledge receipt of the complaint within two (2) working days;
- Investigate the complaint and undertake a site inspection where appropriate within five (5) working days;
- Implement corrective actions where non-compliance or poor practice is identified;
- Where relevant, assess whether lighting orientation, placement or operational controls require adjustment in relation to sensitive receivers (including Denniston); and
- Document investigation outcomes and communicate findings to the complainant.

Complaints will be assessed to determine whether activation of the TARP is required.

8.2 Incident Management

Lighting and visual amenity related incidents include situations where inspections, operational observations or complaints identify an unplanned event, safety risk, or potential non-compliance with this Plan.

Incidents will be managed in accordance with Bathurst's incident management procedures and the TARP. Where required, response actions may include:

- Modification or temporary cessation of relevant activities;
- Implementation of corrective and preventive actions;
- Notification to regulators or other relevant authorities, where applicable; and
- Internal investigation to identify root causes and prevent recurrence.

Records of Lighting and visual amenity related incidents, complaints, inspections, and response actions will be maintained in accordance with the Site Environmental Management Plan (SEMP) and Bathurst's incident management systems.

9.0 Adaptive Management

Adaptive management will be applied to support the ongoing effectiveness of lighting and visual amenity management measures achieving the requirements of the conditions over the life of the Project, including in areas where lighting may be more noticeable due to elevated topography and low baseline lighting conditions, such as Denniston.

The duration and timing of fixed lighting will vary seasonally in response to changes in natural daylight hours, with lighting requirements generally extending to approximately 15 hours in mid-winter and reducing to around 9 hours in mid-summer. Fixed lighting is provided only at defined operational and safety critical locations, and is not required across all areas of the Project. This variation will be managed as part of normal operational practice to ensure lighting is used only when required for safety and operational purposes.

Information from routine inspections, monitoring, complaints, and incident responses will be reviewed to identify opportunities for improvement (including during rehabilitation and closure regarding lighting controls for the MFS water treatment plant for the post-mining operating period). Where necessary, lighting and visual amenity management measures may be refined or adjusted in response to:

- Changes in construction activities or methods;
- Monitoring outcomes or observed trends;
- Community complaints or stakeholder feedback;
- Identified non-compliance or emerging lighting and visual amenity risks; or
- Observations of lighting visibility or glare from elevated or sensitive receivers, including Denniston.

Relevant outcomes will be communicated to site personnel through toolbox talks or other appropriate forums to reinforce good practice. Where required, additional inspections or reviews will be undertaken to confirm the effectiveness of any revised controls, including targeted review of lighting orientation and placement where visibility concerns have been identified.

10.0 Reporting

Reporting is undertaken to document lighting and visual amenity management activities, monitoring outcomes, and incidents to demonstrate compliance with applicable consent conditions, and support the ongoing environmental management of lighting and visual amenity effects associated with the Project. Reporting in accordance with this Plan is proportionate to the scale and nature of monitoring undertaken and is aligned with the risk-based monitoring framework set out in **Section 7.0**, including reporting on outcomes relevant to sensitive receivers where lighting visibility has been identified as a potential issue. Where monitoring, inspections or complaints indicate elevated risk or potential non-compliance, reporting frequency and detail may be increased in accordance with the TARP (see **Section 8.0**).

10.1 Internal Reporting

Lighting and visual amenity monitoring outcomes will be compiled and reported to internal management on a 12-monthly basis within the Environmental Management System (EMS) Management Review Process. The Environmental Manager is responsible for scheduling this review and presenting performance against the Plan's objectives (as outlined in **Section 1.2**), including performance of mitigation measures in areas where lighting may be more noticeable, such as Denniston. Reporting will also include any relevant outcomes for Stockton North, [REDACTED] and the MFS water treatment plant post-mining lighting period where applicable.

Where Level 2 or Level 3 triggers are identified under the TARP, or where monitoring or complaints indicate potential or confirmed non-compliance, additional internal reporting will be undertaken as required. This may include more frequent reporting to site management and relevant personnel to track corrective actions and confirm effectiveness of mitigation measures.

Lighting and visual amenity related community complaints will be recorded in the Community Complaints Register and managed in accordance with the Community Complaints Procedure.

10.2 External Reporting

Lighting and visual amenity related monitoring information will be provided to the relevant regulatory authorities where required by consent conditions or upon request, and in response to incidents, complaints, or abnormal events where reporting is appropriate, including where monitoring or complaints indicate material effects at sensitive receivers. Where a significant incident or non-compliance is identified (Level 3 TARP trigger), reporting will be undertaken in accordance with regulatory requirements and relevant consent conditions.

10.2.1 Annual Work Plan (AWP)

Prior to undertaking activities on site, and annually thereafter, Bathurst will provide an Annual Work Plan (AWP) to the relevant regulatory authorities.

10.2.2 Annual Monitoring Report

Bathurst will prepare and submit an Annual Monitoring Report two months prior to the expiry of the AWP. The reporting period will generally cover 12 months from April to March, unless otherwise agreed. Initially this may be for a different period depending on the commencement date.

As appropriate, lighting and visual amenity management activities, incidents, complaints, and monitoring outcomes will be documented in the Annual Monitoring Report, including any monitoring or mitigation undertaken in response to lighting visibility from elevated or sensitive receivers (e.g. Denniston). This will include a summary of any Level 2 or Level 3 TARP triggers, actions implemented, and outcomes of any compliance monitoring or investigations.

At the time of submission, Bathurst will also advise of any material changes proposed to lighting and visual amenity management arrangements and the anticipated timeframe for implementation of those changes.

11.0 Roles, Responsibilities, and Training

Effective implementation of this Plan relies on clearly defined roles, responsibilities, and appropriate training for all personnel involved in Project activities. Bathurst is committed to ensuring that all employees and contractors understand their responsibilities in managing lighting and visual amenity effects and are aware of the processes for monitoring, response, and escalation.

Responsibilities under this Plan support a management pathway whereby observations and inspections identify potential issues, triggers are assessed, the TARP is activated where required, and appropriate responses and escalation are implemented.

11.1 Roles and Responsibilities

Key roles and responsibilities associated with this Plan are outlined in Table 5.

Table 5: Responsible personnel and tasks

Position	Accountable Task
Site Senior Executive (SSE) / General Manager	- Overall accountability for implementation of this Plan; - Allocating adequate resources to support implementation of this Plan; - Ensure that landscape and visual amenity considerations are included when selecting and installing any new infrastructure; and - Endorses significant management responses where required.
Environmental Manager	- Primarily responsible for implementation and administration of this Plan; - Coordinate lighting and visual amenity monitoring and investigations, where required; - Manage lighting and visual amenity related incidents, complaints and corrective actions; - Coordinate internal and external reporting obligations under this Plan; - Maintain liaison with regulatory authorities as required; - Notify the General Manager of matters requiring review or amendment of this Plan; - Review changes in lighting design, location or operation (including those identified through change management processes) to determine potential lighting and visual amenity effects and whether additional mitigation or monitoring is required; and - Coordinate communication of changes in lighting and visual amenity conditions to relevant personnel and stakeholders, where required.
Training Supervisor	Coordinate training for employees and contractors on lighting and visual amenity management responsibilities and procedures under this Plan.
Supervisors	- Ensure day-to-day operations are undertaken in accordance with the mitigation and management measures set out in this Plan, including providing instruction to workers on relevant lighting and visual amenity controls and protocols; - Identify and respond to operational activities that may increase lighting and visual amenity effects; - Monitor the effectiveness of lighting and visual amenity management measures and report issues as required; - Implement corrective actions as directed; and

Position	Accountable Task
	Identify proposed or actual changes in lighting use or conditions during construction and operations, and notify the Environmental Manager where these may affect lighting or visual amenity outcomes.
All personnel	- Comply with site procedures and controls relevant to lighting and visual amenity management; - Report any lighting and visual amenity related issues, complaints, or incidents to their supervisor; and - Participate in inductions and toolbox talks relevant to the requirements of this Plan.

11.2 Training and Inductions

Lighting and visual amenity management requirements will be included in the Mine Induction Package and induction process for all personnel.

Ongoing environmental awareness training will be delivered through toolbox talks and other appropriate forums. Toolbox talks will address, as required:

- Mitigation measures and good practice;
- Monitoring outcomes and trends;
- Complaints or incidents and lessons learned; and
- Changes to activities, controls, or response procedures.

This training reinforces the link between monitoring outcomes, trigger identification, and appropriate operational responses under the TARP.

12.0 Document Management

This Plan forms part of the SEMP and will be managed in accordance with *BRL-HST-STD-003 Document Control Standard*. This Plan will be reviewed three (3) yearly, or:

- Following any major operational change;
- Following receipt of substantiated complaints related to lighting and visual amenity;
- Following significant incidents or non-compliance;
- Following relevant legislative changes;
- At the request of the regulator.

12.1 Change Register

This Plan is issued, revised, and amended under the authorisation of the SSE/GM. Controlled electronic copies will be available to all workers, and a signed hard copy will be maintained in the Westport document library.

Reasons for changes will be documented in the document management table (see Table 6). Superseded versions will be retained for record purposes and marked as obsolete. Each revised version will be issued with a unique version number and date to prevent the use of outdated documents.

Table 6: Document management

Revision History:			
Date	Version No.	Lead Author	Contributing Authors
19/08/2026	Rev0	IEMA	Bathurst
Version No.:	Detail / Changes:		
Rev0	Issued version.		
Next Planned Review:			

13.0 References

- AS/NZS 4282:2023 Control of the obtrusive effects of outdoor lighting;
- AS/NZS ISO 14001:2016 Environmental Management Systems;
- *Bathurst Resources Limited (2025). Buller Plateaux Continuation Project – Project Description (Draft V4);*
- *BPCP, Existing Infrastructure - Assessment of Environmental Effects – Lighting*, by LDP, 2026;
- *BPCP Landscape Assessment Report*, by Rough Milne Mitchell Landscape Architects (RMM), 2026;
- *BPCP, Proposed Infrastructure - Assessment of Environmental Effects – Lighting*, by LDP, 2026;
- *Buller District Council. (2011). Buller District Plan. <https://bullerdc.govt.nz/planning/district-plan/>; and*
- *West Coast Regional Council (2023). Te Tai o Poutini Plan.*

Attachment 1: Summary of Commitments

Commitment ID	Commitment	Section Reference

Summary of commitments to be inserted upon issue of the final decision.