BATHURST RESOURCES LIMITED

Traffic Management Plan

Buller Plateaux Continuation Project

August 2026

BPCP-ENV-PLN-019 Rev0

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Glossary of Terms and Abbreviations

Term	Definition
ACML	Ancillary Coal Mining Licence
Bathurst	Bathurst Resources Limited, including its subsidiary companies BT Mining Ltd, Bathurst Coal Ltd, and Buller Coal Ltd
BDC	Buller District Council
BPCP	Buller Plateaux Continuation Project
Buller Plateaux	A collective reference to the Stockton Plateau and Denniston Plateau
Community Liaison Group	A formal forum that brings together community representatives, Bathurst, and regulators to share information, address concerns, and support transparent communication about the impacts and management of the Project, and ongoing operations.
CoPTTM	Code of Practice for Temporary Traffic Management
CML	Coal Mining Licence
EMS	Environmental Management System
ESE	Escarpment Extended Project sub-area
FTAA	Fast-track Approvals Act 2024
HSEC	Health, Safety, Environment, and Community
km	Kilometres
m	Metres
MFS	Mount Frederick South Project sub-area
MP	Mining Permit
NZTA	Waka Kotahi New Zealand Transport Agency
OD	Over-dimension
OW	Over-weight
RCA	Road Controlling Authority
SEMP	Site Environmental Management Plan
SEP	Stakeholder Engagement Plan
SH6	State Highway 6
SH67	State Highway 67
SH69	State Highway 69
SH7	State Highway 7
SQEP	Suitably qualified and experienced person
SSE	Site Senior Executive
TARP	Trigger Action Response Plan
The Project	The Buller Plateaux Continuation Project
TMP	Traffic Management Plan
UWHR	Upper Waimangaroa Haul Road Project sub-area
vpd	Vehicles Per Day

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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 Traffic Management Plan (also referred to as the "Plan", or TMP) outlines the objectives, risks, management controls, responsibilities, and training requirements for managing traffic effects arising from construction and operational vehicle movements associated with the Project on the public transport network and other users.

This Plan applies across the Project area as a whole, with particular focus on construction and initial establishment works associated with the Project extension areas Escarpment Extended (ESE), Mount Frederick South (MFS), and the Upper Waimangaroa Haul Road (UWHR), as these works are anticipated to give rise to the majority of traffic effects on the localised and potential wider public road network.

In this context, this Plan identifies and sets out measures to manage traffic effects on the public road network, particularly the Denniston Track (Banbury Street, Denniston Road and Burnetts Face Road) during construction and initial establishment works, and the potential for abnormal event haulage on Millerton Road and State Highway 67 (SH67). Abnormal event haulage includes if the Ngākawau Aerial Ropeway is unavailable or if there is an unplanned railway outage. Routine operational traffic effects are expected to remain consistent with existing conditions due to the continued use of private haulage infrastructure.

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

- *Buller Plateaux Continuation Project – Stockton Mine, Integrated Transport Assessment*, by Stantec NZ, 10 November 2025.
- *Buller Plateaux Continuation Project – Denniston Plateau Access, Integrated Transport Assessment*, by Stantec NZ, 28 April 2026.

A consolidated summary of commitments made under this Plan, including monitoring, management, reporting, and review obligations, is provided in **Attachment 1**.

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1.2 Objectives

The objectives of this Plan are to outline the controls to:

- Maintain the safety of all road users on the public road network potentially affected by Project traffic;
- Avoid, remedy or mitigate adverse traffic effects arising from the Project construction, operation, and any abnormal event traffic, including effects on recreational users of the Denniston Track;
- Achieve compliance with relevant consent conditions and statutory requirements relating to traffic, transport and road safety; and
- Provide clear protocols for driver behaviour, communication, and incident/complaint response.

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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 define the operational footprint of the Project.

The proposed Project consent boundary is shown in Error! Reference source not found.Error! Reference source not found..

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.

2.3 Key Traffic Elements

Key traffic related elements of the Project include:

- Construction of the UWHR as a private haul road linking Denniston Plateau operations to existing Stockton Mine infrastructure;
- Use of the public road network for workforce access and delivery of materials during construction and limited operational activities (notably via the Denniston Track to the Denniston Plateau); and
- Existing transport links at Ngākawau, including the aerial ropeway and rail loadout, which minimise reliance on public roads under normal operating conditions.

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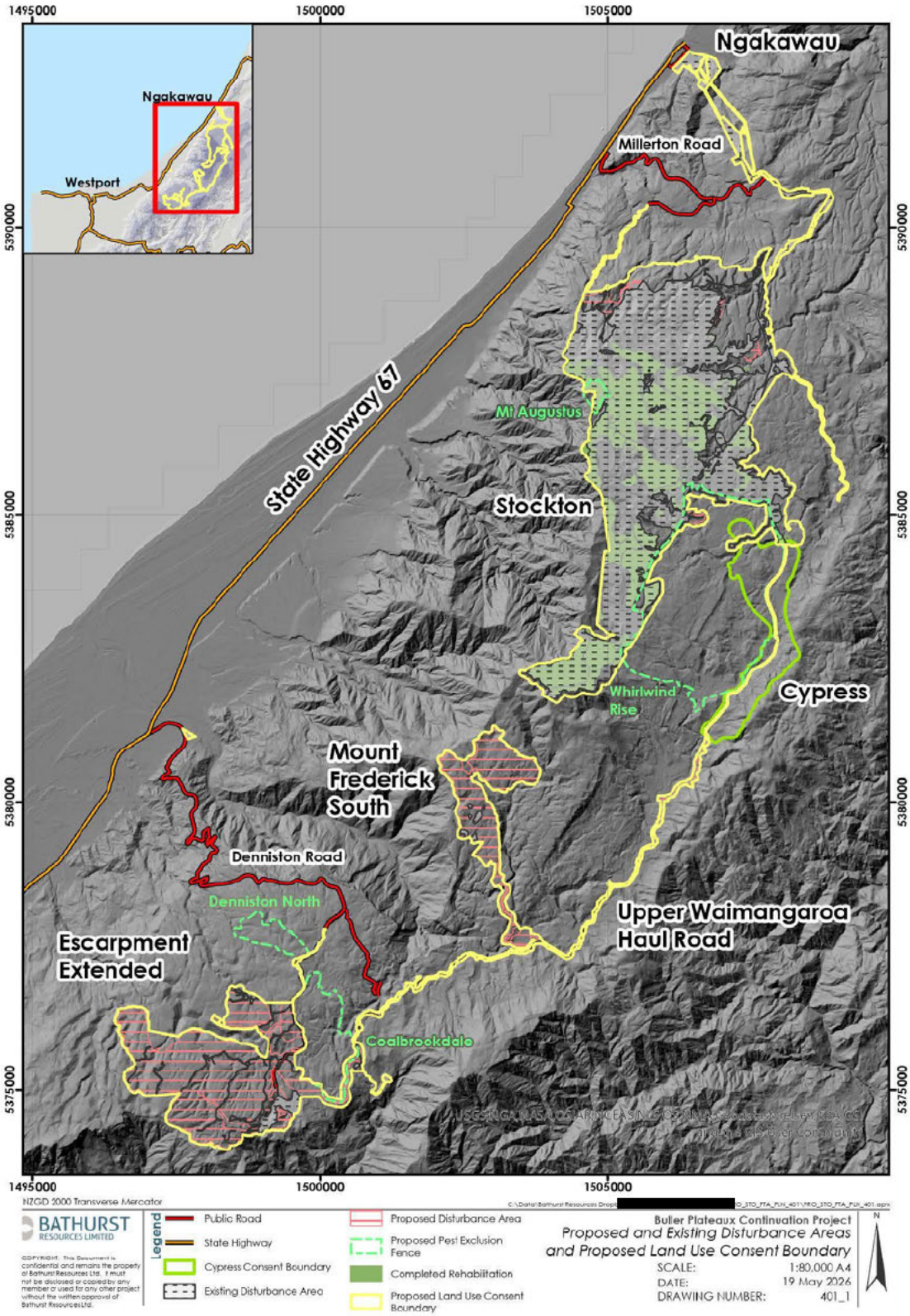

Figure 1: Proposed and Existing Disturbance Areas and Proposed Land Use Consent Boundary for the Project

2.3.1 Construction Traffic

Construction of the Project, including the UWHR and associated infrastructure, will commence following Project approval and is expected to occur over an approximate two-year period. Construction activities will be staged and sequenced to manage traffic effects, with workforce access and delivery of materials occurring intermittently depending on the stage of works. Routine coal haulage from Denniston Plateau operations will commence following completion of the UWHR.

Based on the Stantec Integrated Transport Assessments prepared for the Project, construction-related traffic is expected to be low in volume and predominantly associated with workforce access.

During peak construction periods:

- Up to approximately 10 vehicle movements per day are expected on Millerton Road and SH67, primarily associated with workforce access. This includes travel by the northern UWHR construction team to and from the Stockton Mine, generating around five inbound movements in the morning and five outbound movements in the afternoon during shift-change periods;
- On average, less than one heavy vehicle movement per day may occur for delivery of construction materials (e.g. culverts, geotextiles) via the public road network, including SH67 and Millerton Road;
- Construction staff are expected to generally arrive outside the morning commuter peak and depart in the afternoon, reducing interaction with peak traffic periods; and
- Periods of increased heavy vehicle activity (approximate peak of 20-30 daily heavy movements) on the Denniston Track may occur during specific construction tasks, which may result in interaction with other road users, including recreational users, due to the constrained nature of this route.

2.3.2 Operational Traffic (Coal Production Phase)

Typical traffic movements to and from the Stockton Mine site under existing operations are in the order of 250-300 vehicle movements per weekday, including all vehicles travelling between Ngākawau and Stockton.

Bathurst proposes to continue to utilise private infrastructure for coal transport in order to avoid impacts on public roads. Specifically:

- Under normal operating conditions, all coal produced at MFS and ESE will be transported via the UWHR to Stockton for processing, conveyed to Ngākawau via the aerial ropeway, loaded at the Ngākawau Rail Loadout, and transported by rail to Lyttelton Port;
- Production activities on the Denniston Plateau are expected to generate traffic volumes similar to existing Stockton operations; and

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- Accordingly, no increase in routine operational traffic volumes on Millerton Road or SH67 is proposed under the Project.

2.3.3 Site Access Arrangements

Access to the Project is achieved via a combination of public road and private haul road infrastructure including:

- Denniston Track (McGill Street, Banbury Street, Denniston Road and Burnetts Face Road): Provides the only public road access to the Denniston Plateau, including access to the ESE area and UWHR construction works. This route is used by workforce vehicles and light vehicles, with occasional heavy vehicle access for construction deliveries.
- Millerton Road (via SH67): Provides access between SH67 and the Stockton Mine and is used for workforce access, light vehicles, and limited heavy vehicle movements.
- Stockton Mine access point (via Millerton Road): A controlled site access point for operational and construction traffic associated with the Stockton Mine.
- ESE access / gatehouse (via Denniston Track): Controlled access point for construction and operational activities on the Denniston Plateau.
- UWHR: A private haul road connecting the Denniston Plateau (ESE and MFS) to the Stockton Mine. The UWHR is used for internal haulage of coal, equipment, and materials and does not interface with the public road network during normal operations.

Access beyond controlled entry points is managed in accordance with site access procedures, including restrictions on unauthorised vehicles and the use of escort arrangements where required.

2.3.4 Abnormal Events

On rare occasions, such as during planned or unplanned outages of the rail network, aerial ropeway, or haul roads, Bathurst may need to implement contingency coal haulage arrangements that involve the temporary use of public roads. These scenarios are non-routine, temporary, and infrequent, and would be managed in accordance with this Plan.

Potential abnormal event scenarios include:

- Rail outage: In the event of a shutdown of the rail network, coal loaded at the Ngākawau Rail Loadout may need to be transported by road as a contingency measure. In this scenario, up to approximately 250 two-way truck movements per day may occur along SH67 between Ngākawau and Ikamatua, based on a six-day working week. This scenario would not generate additional traffic on Millerton Road or the Denniston Track.
- Ngākawau Aerial Ropeway outage: If the aerial ropeway is temporarily unavailable, coal may be trucked between Stockton and the Ngākawau Rail Loadout using public roads; and

- UWHR closure (Denniston bypass haulage): If bypass haulage from the Denniston Plateau is required due to a UWHR closure, up to approximately 25 truckloads per day (around 50 truck movements) may occur from the Denniston Plateau to Stockton or Ngākawau via public roads for a short duration, typically limited to a few days.

3.0 Environmental Setting

3.1 Existing Traffic Environment

The surrounding traffic environment comprises a mix of state highways, local roads, and low-volume access routes serving recreational, local communities, rural land uses, and mining activities, as shown in **Figure 2**.

3.1.1 State Highway Network

Figure 3 shows the state highway network for the northern West Coast area. Travel between the Project area and Ikamatua involves using SH67 to State Highway 6 (SH6) south of Westport, SH6 to Inangahua, State Highway 69 (SH69) from Inangahua to Reefton, and then State Highway 7 (SH7) to Ikamatua.

SH67 provides the primary road connection between Westport and Ngākawau and is the main route used by Project-related traffic accessing the Stockton Mine via Millerton Road at Granity. SH67 is a two-lane rural state highway that services local communities, industry, and through traffic, and includes multiple rail level crossings.

The annual daily traffic volumes recorded on SH67 by the Waka Kotahi NZ Transport Agency (NZTA) indicate that the average daily traffic volumes have increased from approximately 2,100 vehicles per day (vpd) in 2018 to approximately 2,500 vpd in 2024 at the count site north of the Orowaiti River.

3.1.2 The Local Road Network

The Denniston Plateau, south-east of Waimangaroa, is accessed via the Denniston Track, comprising McGill Street, Banbury Street, Denniston Road, and Burnetts Face Road. This route provides the only public road access to the Denniston Plateau and is used by residents, visitors, recreational users, and authorised operational traffic. Traffic volumes on the Denniston Track are low relative to SH67, reflecting its constrained geometry and access function.

The annual average daily traffic volumes recorded on the Denniston Track by NZTA indicate that traffic volumes are low and remained relatively stable over time. Based on monitoring data, typical weekday traffic volumes are approximately 70 vpd, with higher volumes observed on weekends (approximately 90 vpd). Peak period volumes (90th percentile) may reach approximately 170 vpd on weekends and less than 120 vpd on weekdays.

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The Stockton mine is located on a plateau to the east of Granity and Ngākawau. Coal from the mine is normally transported from Stockton via an aerial ropeway system to the loadout facility in Ngākawau for onward transport by rail.

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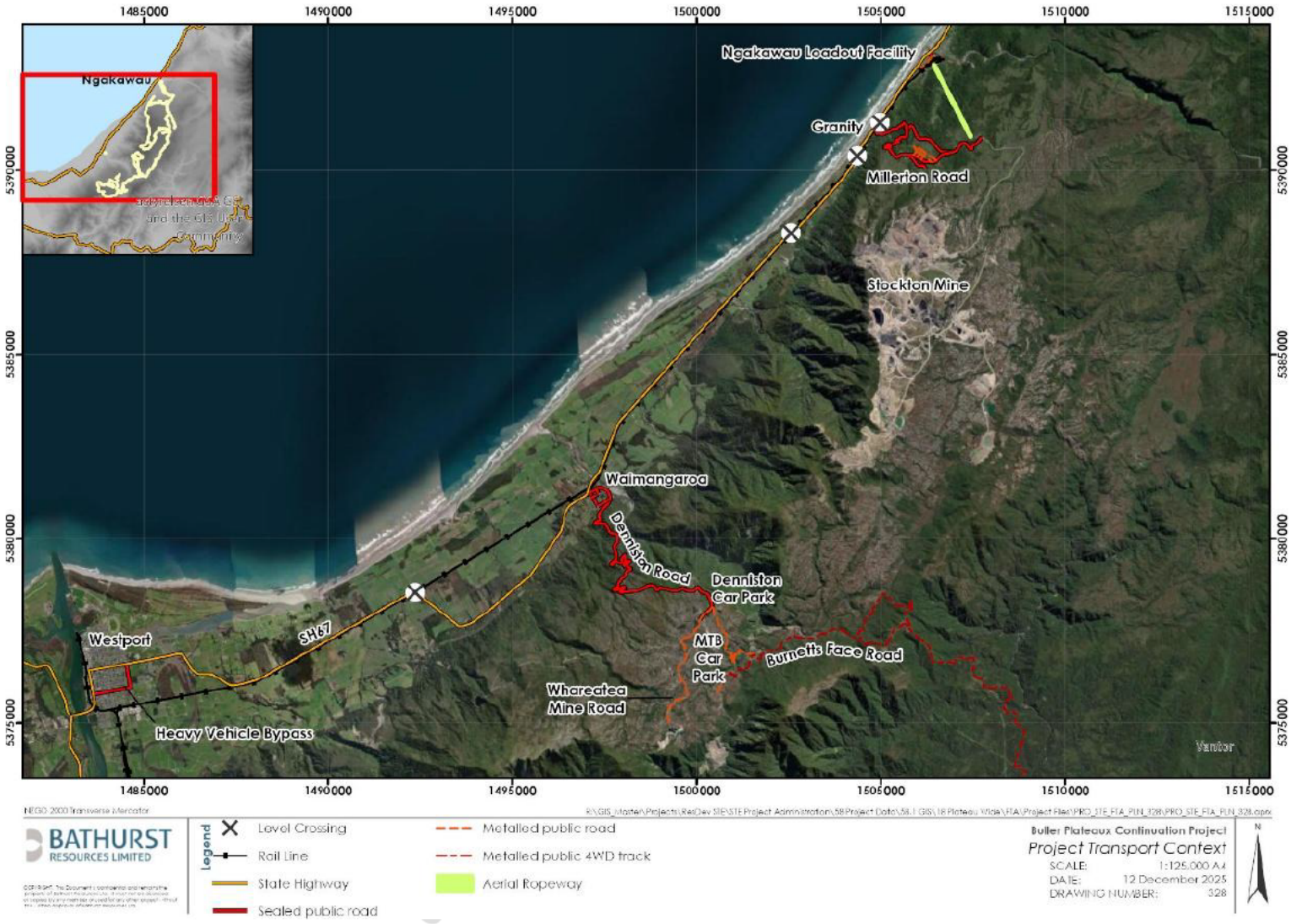

Figure 2: Project Traffic Context

Figure 3: State Highway Network

3.1.3 Staff Transport

Bathurst provides organised staff transport to site for employees travelling from Westport and Carters Beach. Depending on shift requirements and crew composition, staff are transported by bus, minibus, or light vehicle. Existing traffic movements associated with current operations include travel between Westport, Ngākawau, and the Stockton Mine.

Based on the Integrated Transport Assessments prepared for the Project (Stantec NZ, November 2025), operational traffic volumes under the Project are expected to be generally consistent with existing Stockton operations. This reflects the continued use of private infrastructure for coal haulage and the absence of any proposed change to routine operational access arrangements on the public road network.

Typical daily traffic movements to and from the Stockton site under current operations are summarised in **Table 1**.

Table 1: Typical daily traffic movements to and from Stockton site (current operations)

Weekday	Light Vehicles	Mini vans	Buses	Trucks
Monday – Friday	120 – 150	28	8	4 – 10
Saturday and Sunday	12 – 18	6	4	0 – 3

3.1.4 Coal Haulage

Under normal operating conditions, coal haulage associated with the Project will continue to utilise private infrastructure, including the Upper Waimangaroa Haul Road, the aerial ropeway, and the rail network at Ngākawau. Accordingly, no routine increase in operational traffic volumes on the public road network is anticipated as a result of the Project.

3.2 Sensitive Receivers

Sensitive receivers and road users in relation to traffic associated with the Project include:

- Residents and community users in Waimangaroa, Granity, Ngākawau and Denniston who use SH67, the Denniston Track, and local roads;
- School bus services and vulnerable road users on local roads within these settlements;
- Recreational users of the Denniston Track and Denniston Plateau, including visitors to the historic mining area, walkers, and mountain bike users; and
- Rail network users at level crossings on SH67 and Millerton Road.

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4.0 Statutory Requirements

This Plan has been prepared to meet the statutory requirements for managing traffic effects associated with the BPCP, to support the FTAA process.

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

4.1 Legal Framework and Consent Requirements

A summary of consent requirements that are relevant to this Plan are listed below in **Table 2**.

Table 2: Consent condition requirements relevant to this Plan

Condition ID	Condition Description	Referenced in Plan

Consent conditions to be inserted upon issue of final decision.

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4.2 Standards and Guidelines

The standards and guidelines relevant to the management of traffic effects associated with the Project are summarised in **Table 3**. These documents provide the technical framework for measurement, assessment, risk management, and implementation of mitigation measures under this Plan.

Table 3: Standards and guidelines relevant to this Plan

Standard/Guideline	Relevance
NZTA – Integrated Transport Assessment Guidelines (2019)	Provides the primary framework for assessing traffic effects of the Project on the state highway and local road network, including construction, operational, and abnormal event scenarios.
NZTA – Code of Practice for Temporary Traffic Management (CoPTTM)	Establishes requirements for temporary traffic management on public roads during construction activities, including signage, traffic control, and protection of road users.
NZTA – Planning Policy Manual	Relevant to the functional classification of SH67 and consideration of traffic effects on the state highway network.
Austroads Guides (as adopted by NZTA)	Provides supplementary guidance on road geometry, heavy vehicle movements, and traffic management practices where referenced or adopted by Waka Kotahi for use in New Zealand.
Land Transport Rule: Traffic Control Devices Rule 2004 (as amended)	Establishes the statutory framework for the use of traffic control devices on public roads, under which Waka Kotahi guidance such as CoPTTM is applied.

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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.

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6.0 Management Approach

This section outlines the risk-based approach adopted by Bathurst to manage traffic 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

Traffic risks associated with the Project arise from interaction between Project-related vehicle movements, other road users, and the existing characteristics of the surrounding road network.

The key sources of potential traffic effects under this Plan are summarised in **Table 4**. These risks reflect the continuation and spatial extension of existing mining activities are primarily associated with construction activities, abnormal events, and limited operational interactions with the public road network based on the findings of the Stantec Integrated Transport Assessments prepared for the Project. These risks inform the mitigation and management measures described in **Section 6.2**.

Table 4: Key risks associated with the management of traffic

Source (caused by)	Effect (risk)
Construction and limited operational vehicle movements on constrained public roads (including the Denniston Track, Burnetts Face Road and Whareatea Mine Road)	Increased risk and severity of vehicle crashes due to steep gradients, narrow carriageways, limited passing opportunities, and restricted visibility, particularly involving heavy vehicles, and potential impacts on road pavement condition and structural integrity.
Interaction between Project traffic and other road users (including pedestrians, cyclists and motorcyclists)	Increased safety risk to vulnerable road users (e.g. cyclists and motorcyclists) due to narrow road widths, limited separation from traffic, and mixed use with recreational users.
Project related traffic at intersections and access points	Increased risk of turning, crossing, and queuing conflicts involving heavy vehicles, particularly where sight distances or stacking space are constrained.
Project related traffic at rail level crossings on SH67 and Millerton Road	Increased risk of vehicle–train conflict or near-miss events due to constrained approaches, visibility limitations, and existing crossing configurations.
Abnormal event haulage involving temporary increases in heavy vehicle volumes	Short-term increase in interaction between heavy vehicles and other road users on constrained sections of the public road network, and potential impacts on road pavement condition and structural integrity due to increased heavy vehicle loading.

6.2 Mitigation Measures – Construction Phase Only

During construction, traffic effects will be managed through a combination of traffic volume controls, task sequencing, scheduling, driver communication protocols, and targeted localised road improvements. The measures are designed to minimise disruption to other road users and manage safety risks during temporary construction activities on the public road network.

Key construction phase measures include:

- Construction activities and deliveries will be planned and coordinated to avoid clustering of multiple heavy vehicle movements (i.e. multiple trucks travelling the route at the same time), thereby reducing interaction with other road users;
- Where short-duration delivery-intensive activities are required, these will, where practicable, be scheduled to avoid periods of increased recreational use (e.g. summer weekends and public holidays);
- Shared transport options, including buses and carpooling, will be used for construction crews where practicable; and
- Temporary traffic management measures will be implemented where required in accordance with NZTA requirements and in consultation with the relevant Road Controlling Authority (RCA).

6.3 Mitigation Measures – Construction and Operation Phases

6.3.1 Localised Road Improvements

Bathurst will implement a pavement maintenance plan, in consultation with BDC, for all public roads used by Project-related traffic, including Denniston Road, Burnetts Face Road and Whareatea Mine Road.

The purpose of the pavement maintenance plan is to ensure that affected roads are maintained at an agreed baseline condition, and that any damage attributable to Project-related traffic is identified and remedied in a timely manner. The pavement maintenance plan will apply during construction and operation, with monitoring and maintenance requirements continuing for as long as Project-related traffic has the potential to affect road condition.

The pavement maintenance plan will include the following components:

- Baseline condition survey: Prior to construction at ESE or on the UWHR, Bathurst will engage a suitably qualified and experienced person (SQEP), approved by BDC, to undertake a pre-construction survey of Denniston Road, Burnetts Face Road and Whareatea Mine Road. The survey will record existing pavement condition and define any required initial upgrade works

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to support Project-related heavy vehicle movements. A copy of the survey will be provided to BDC prior to construction.

- Post-construction survey: A follow-up survey will be undertaken following completion of construction activities, or at another time agreed with BDC, to assess any changes in pavement condition;
- Post-upgrade survey (Ongoing Baseline): Within 20 working days of completion of each section of the initial road upgrade works, Bathurst will engage a SQEP (approved by BDC) to undertake a post-upgrade road survey to confirm road condition. The results of this survey will establish the Ongoing Baseline condition for the roads, and a copy will be provided to BDC.
- Ongoing monitoring: Monitoring of road condition during construction and, where relevant, during abnormal event haulage, will be undertaken in coordination with BDC;
- Maintenance and repair: Repair of any damage to public roads attributable to Project-related traffic, in accordance with agreed arrangements with BDC; and
- Return to Ongoing Baseline condition: Upon cessation of construction at ESE, Bathurst will fund BDC to undertake any maintenance or upgrade works necessary to return the roads to the Ongoing Baseline condition established by the post-upgrade surveys.
- Coordination with BDC: Ongoing liaison with BDC to agree maintenance requirements, timing of works, and any necessary remedial actions.

Bathurst will provide funding to BDC for the implementation of the initial road upgrade works identified in the baseline road survey, in accordance with agreed arrangements between Bathurst and BDC.

Where required to support safe construction traffic movements, localised improvements to the public road network will be undertaken by suitably qualified contractors in agreement with BDC, as outlined in Error! Reference source not found..

Table 5: Construction phase improvements to the Public Road Network

Location / Element	Improvement
Denniston Track	The following improvement works are considered essential to allow for safe operation of Denniston Track: • Construction of wide shoulders to allow slow vehicles to pull over clear of the traffic lane; • Improved road marking and signage at the Denniston Road / Burnetts Face Road / Boswell Street intersection; and • Maintenance and repair of the road pavement to support safe use by all road users. Where localised improvements are required to accommodate construction-related truck and trailer movements, Bathurst will prepare and submit details of the proposed works and associated temporary traffic management measures to Buller District Council (BDC) prior to works commencing. Any necessary safety improvements will be implemented in conjunction with required maintenance or repair works and may include carriageway widening and upgrades to roadside drains to reduce unrecoverable edges within 0.5 m of the traffic lanes.

Location / Element	Improvement
Burnetts Face Road	Widening at small-radius curves between Denniston and Whareatea Mine Road to provide a minimum sealed carriageway width of approximately 6.6 m.
Whareatea Mine Road	Widening at the Whareatea Mine Road / Burnetts Face Road intersection to enable two-way truck movements.
Railway Crossings	Safety risks at existing railway crossings will be managed through driver communication protocols, strict compliance with existing road and rail controls, and ongoing liaison with the relevant road and rail controlling authorities. No physical upgrade works to railway crossings are proposed at this stage as the Project is not expected to materially increase risk at existing railway crossings, as traffic volumes and vehicle types using these crossings will remain broadly consistent with existing conditions.

6.3.2 Driver Protocols

In addition to legal driving requirements, all drivers associated with the Project will comply with site-specific protocols when travelling on public roads. This includes adhering to reduced speeds on unsealed roads and managing vehicle movements to reduce interaction with recreational users of the Denniston Track, where practicable.

6.3.2.1 Driver Communication Protocol

A driver communication protocol using two-way radios will be implemented to manage movements on constrained sections of road and reduce the risk of two-way conflicts between heavy vehicles and light vehicles. This protocol is based on arrangements previously used for Escarpment Mine operations.

Contact details for site management will be made available to road users, including through signage at key access points and, where appropriate, other local communication channels. Where required, oversize load movements or temporary road closures will be communicated through appropriate local channels (e.g. signage, public notices, or direct stakeholder communication). A copy of the Driver Communication Protocol is provided in **Attachment 2**.

6.3.3 Employee Site Access and Travel Volumes

Shared transport arrangements will be prioritised for employees, including scheduled bus services and van pooling, to manage traffic volumes. On-site parking will prioritise shared transport vehicles.

6.3.3.1 Stockton

Employee access and travel volumes for current Stockton operations have been described in **Section 3.1**, no additional changes are proposed.

6.3.3.2 ESE

Construction staff movements will vary as works progress and may include up to approximately 30 combined bus and light vehicle two-way trips per day via the Denniston Track. Movements will generally occur during early morning and late afternoon periods and will be managed through scheduling and traffic controls to minimise interaction with recreational users.

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Access to the site or the UWHR will be managed in accordance with site access procedures. This may include contractor light vehicles, parts and supply delivery vehicles, and other vehicles granted access, escorted or special access where required. Special access arrangements may include Transpower inspection and maintenance, Mount Rochfort transmitter access, or access to the Mackley Track via the UWHR.

6.3.3.3 MFS

Access to the MFS mining area will occur entirely via internal haul roads and the UWHR, with no interface with the public road network. No additional public road traffic management measures are required for MFS access.

6.3.4 Over-weight and Over-dimension Loads

Over-weight (OW) and over-dimension (OD) loads associated with the Project will be managed in accordance with the *Land Transport Rule: Vehicle Dimensions and Mass 2016*, NZTA permitting requirements.

The public road network providing access to the Project includes constrained road sections, narrow carriageway widths, limited passing opportunities, and shared use with other road users. Accordingly, movements of OW and OD loads will be planned and managed to minimise safety risks to other road users and potential effects on road infrastructure.

A load permit will be required where a vehicle or load exceeds any of the following thresholds:

- Width exceeding 2.55 metres (m);
- Height exceeding 4.3 m;
- Overall length exceeding 22.0 m;
- Load extending beyond permitted front or rear overhang limits;
- Vehicle or combination not meeting the prescribed turning path requirements;
- Gross mass exceeding 44 tonnes;
- Axle load exceeding prescribed limits; or
- Loads that may affect bridge safety or road pavement integrity.

Movements of OW and OD loads will be planned in consultation with the relevant RCA and undertaken in accordance with applicable load permit conditions and traffic management requirements for the affected roads.

Operational protocols applicable to OW and OD loads are summarised in **Table 6** and will be complied with at all times.

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Table 6: Over-weight and Over-dimension Load Protocols

Item	Protocol
Transport Routes	OW and OD loads will be transported using routes approved through applicable permit conditions and in consultation with the relevant Road Controlling Authority.
Time and Location Restrictions	Travel times and route restrictions will be determined through applicable permit conditions and site-specific transport planning.
Operating Restrictions for Bridges and Railway Crossings	Where required, additional controls for bridges and railway crossings will be implemented in accordance with permit conditions and instructions from the relevant RCA and/or KiwiRail.
Piloting Procedures	Pilot vehicle requirements will be implemented in accordance with the *Land Transport Rule: Vehicle Dimensions and Mass 2016* and applicable permit conditions.
Contingency Plans	In the event of a breakdown, accident, or road obstruction, drivers will follow site incident response procedures and comply with instructions from emergency services and the relevant RCA.
Communication Provision	Communication procedures for OW and OD load movements will align with the driver communication protocols established under this Plan (refer **Section 6.3.2.1**).

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6.3.5 Other Standard Mitigation Measures

In addition to the measures outlined above, the following standard mitigation measures will be implemented where relevant to Project activities and where traffic movements have the potential to affect public road users or nearby communities:

- Community engagement mechanisms will be maintained to receive and respond to traffic-related feedback.
- Where road transport of coal or materials occurs, loads will be covered as necessary and vehicle-generated dust will be managed using water carts or other appropriate measures.
- All Project drivers will be subject to site-specific inductions and training addressing traffic risks, road conditions, and shared road use.
- Engine-braking restrictions and noise minimisation measures will be applied where required to manage amenity effects.
- Road markings and signage may be installed at key locations to support safe two-way traffic movement and improve road user awareness.

These measures will be applied in a proportionate manner and reviewed as required based on operational experience, monitoring outcomes, or feedback.

6.4 Mitigation Measures – Abnormal Events

As discussed in **Section 2.3.4**, abnormal events may occur on a non-routine basis and require temporary changes to transport arrangements involving public roads. Where abnormal event haulage is required, the following mitigation measures will be implemented, as applicable:

- Traffic movements will be managed in accordance with this Plan;
- Pavement condition and wear on affected public roads will be monitored in consultation with NZTA and BDC, as relevant;
- Where abnormal event haulage is required for a short duration (less than 10 consecutive days), Bathurst will implement appropriate monitoring and management measures in consultation with the relevant RCA;
- Where abnormal event haulage is anticipated to be required for 10 or more consecutive days, Bathurst will activate the Public Road Action Plan in accordance with **Section 6.4.1**. In such cases, Bathurst will work with NZTA and BDC to develop and implement a coordinated plan for road condition monitoring, maintenance, and repair;
- Bathurst will repair any damage to BDC managed public roads attributable to Project-related traffic, in accordance with agreed arrangements with BDC;
- Advance notification will be provided to relevant authorities and affected communities where practicable, particularly where changes to traffic patterns or vehicle types are expected; and

- In the event that coal transport is required on Millerton Road, then all drivers will complete specific induction training session so that they understand all communication protocols for travel on Millerton Road, site specific hazards at Stockton and expectations in terms of movement on the public road network.

Abnormal event traffic management measures will apply only for the duration of the event and will be reviewed once normal operating conditions are restored.

6.4.1 Public Road Action Plan

Bathurst will prepare and maintain a Public Road Action Plan and will review it annually. Where an abnormal event occurs and public road haulage is anticipated to be required for 10 or more consecutive days, Bathurst will activate the Public Road Action Plan and notify BDC, and where State Highways are affected, NZTA, within 24 hours of activation of the Plan.

The Public Road Action Plan will include, as a minimum:

- Affected roads and routes, haul directions, and maximum daily heavy vehicle movements;
- Operating hours, speed controls, engine braking restrictions, and driver protocols;
- Safety controls, including temporary traffic management, signage, pilot/escort vehicle triggers, layover locations, and fatigue management;
- Vehicle and load management measures, including covering of loads and, where practicable, measures to minimise tracking of material onto public roads (e.g. vehicle cleaning or similar controls where required);
- Amenity controls, where practicable, to minimise noise, vibration, dust, lighting/glare, and headlight effects on residents;
- Community information measures, including advance public notice where practicable, provision of updates during the activation period (e.g. via website updates, social media, or local traffic notifications), and a 24-hour complaints and incident hotline;
- Monitoring and reporting requirements, including daily heavy vehicle logs, GPS tracking or equivalent records, complaints logs, incidents, and near misses; and
- Contacts and responsibilities, including Bathurst's after-hours contacts.

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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 traffic related issues. Monitoring outcomes inform operational decision-making and, where relevant, activation of the Trigger Action Response Plan (TARP).

Monitoring is implemented in accordance with applicable consent conditions (see **Section 4.1**), relevant standards (see **Section 4.2**), and Bathurst's established monitoring procedures.

7.1 Routine Inspections and Monitoring

Bathurst will continue to collect and record vehicle movement information for Project related traffic on key public roads accessed by the Project, including Denniston Road, Burnetts Face Road and Whareatea Mine Road, including total daily vehicle movements and classification by vehicle type.

Monitoring of the Denniston Track will also support implementation of the pavement maintenance plan developed in consultation with BDC, including identification of maintenance needs, safety improvements, and progressive management of road condition over time.

Vehicle movement information will be collected at key access points and representative locations, including via a vehicle counter located on the public roadside of the Stockton gate, and through other site recording systems as required.

Routine inspections and monitoring will be undertaken to confirm that traffic management measures are implemented as required, remain effective, and that Project related traffic does not result in unacceptable effects on the public road network. These inspections may include, where relevant:

- Visual inspections of public roads used by Project-related traffic to identify any pavement damage or safety issues, undertaken in coordination with BDC and in accordance with any applicable agreements;
- Confirmation that approved temporary traffic management measures and protocols are implemented during relevant activities;
- Recording and review of traffic-related complaints or feedback received from the public or the Community Liaison Group; and
- Periodic review of traffic-related safety incidents and near-misses involving Project traffic.

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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 traffic related incidents, operational observations, and community complaints associated with the Project. The TARP supports timely identification and management of traffic risks by linking observed issues to proportionate response actions and integrates with Bathurst's existing incident and complaints management systems.

Triggers for response may arise from routine inspections or operational observations, traffic related incidents or near-misses, community complaints, or changes in traffic conditions during construction or abnormal events.

Response actions are implemented in accordance with the trigger levels and actions set out in **Table 7**.

Table 7: Trigger Action Response Plan (TARP)

Trigger	Action
Level 1 – Observation or Minor Issue	
Isolated observations or minor issues such as short delays, minor complaints, or near-misses with no injury or damage, or material safety risk.	• Review traffic conditions and operational controls; • Reinforce driver protocols or communication procedures as required; • Implement minor adjustments to traffic management measures if necessary; • Notify relevant site management and environmental personnel; and • Document findings and actions taken in safety management system (i.e. INX).
Level 2 – Minor Traffic Incident or Repeated Issue	
Repeated Level 1 triggers, substantiated complaints indicating increased risk or amenity effects, or a traffic incident involving Project vehicles that results in minor damage, minor medical/first aid related injury, disruption or safety concern (but no serious injury)	• Implement corrective actions to address the identified issue (e.g. changes to timing, routing, communications, or staffing); • Undertake targeted inspections or monitoring to confirm the effectiveness of implemented corrective actions and traffic management measures in addressing the identified issue; • Notify relevant internal management and, where appropriate, affected stakeholders or authorities; and • Investigate and document root causes, actions and outcomes.
Level 3 – Serious Traffic Incident	
A serious traffic incident involving Project vehicles resulting in significant injury, lost time injury, or death (or multiple deaths), significant damage, or a confirmed high-risk situation, including any incident requiring emergency response, regulatory notification, or involving a significant adverse effect attributable to Project traffic.	• Undertake a detailed investigation and review of management; • Modify or suspend relevant activities where required to prevent further risk; Implement incident or emergency response procedures in accordance with site systems; • Notify regulators and relevant authorities as required Undertake a detailed investigation and review of traffic management measures prior to recommencing activities; 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 traffic.

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; 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

Traffic related incidents include events where observations, inspections or complaints identify an unplanned event, safety risks, or potential non-compliance associated with this Plan.

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

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

Records of traffic 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.

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9.0 Adaptive Management

Adaptive management will be applied to support the ongoing effectiveness of traffic management measures in achieving the requirements of the conditions over the life of the Project.

Information from routine inspections, monitoring, complaints, and incident responses will be reviewed to identify opportunities for improvement. Where necessary, traffic 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; or
- Identified non-compliance or emerging traffic risks.

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.

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10.0 Reporting

Reporting is undertaken to document traffic management activities, monitoring outcomes, and incidents to demonstrate compliance with applicable consent conditions, and support the ongoing environmental management of traffic 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**.

10.1 Internal Reporting

Traffic monitoring information, inspection outcomes, incidents, and complaints will be collated and reported internally through Bathurst's Environmental Management System (EMS) management review processes. Internal reporting will occur at least annually, or more frequently where required to address identified issues. The Environmental Manager is responsible for coordinating internal reviews and reporting performance against the objectives of this Plan (as outlined in **Section 1.2**).

Any actual or potential non-compliance with this Plan identified through inspections, monitoring, incidents, or complaints will be managed in accordance with the SEMP. This includes recording non-compliances, corrective actions, assigned responsibilities, and completion timeframes. Traffic-related complaints will be recorded in the Community Complaints Register and addressed in accordance with the Community Complaints Procedure.

10.2 External Reporting

External reporting under this Plan will be undertaken in accordance with the applicable consent conditions relating to traffic management and monitoring.

The following reporting requirements apply:

- **Quarterly traffic data**: Vehicle movement data for Project-related traffic using Denniston Road, Burnetts Face Road and Whareatea Mine Road will be provided to BDC on a quarterly basis, or at another frequency agreed in writing with BDC.
- **Public Road Action Plan Notification**: Where the Public Road Action Plan is activated in response to an abnormal event, Bathurst will notify BDC, and where State Highways are affected NZTA, within 24 hours of activation.
- **Public Communication During Abnormal Events**: During periods when the Public Road Action Plan is activated, Bathurst will provide timely updates (e.g. via website updates, social media, or local traffic notifications) to affected road users and communities and maintain a dedicated 24-hour complaints and incident hotline.

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- **Provision of additional monitoring information**: Monitoring/inspection records, incident records, and other relevant traffic management information will be provided to BDC or NZTA where requested.

10.2.1 Annual Work Plan

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

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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 traffic 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 8** below.

Table 8: Responsible personnel and tasks

Position	Accountable Task
Site Senior Executive (SSE) / General Manager (GM)	• Overall accountability for implementation of this Plan; • Allocating adequate resources to support implementation of this Plan; • Address traffic considerations during the planning and installation of new infrastructure; • Endorses significant management responses where required; and • Approve key management plans and agreements (e.g. pavement maintenance plan, Public Road Action Plan) where required.
Environmental Manager	• Primarily responsible for implementation and administration of this Plan; • Schedule traffic inspections, monitoring activities, and data collection as required; • Coordinate investigation and management of traffic-related incidents and complaints; • Manage internal and external reporting obligations under this Plan, including quarterly traffic data reporting to BDC, notification of Public Road Action Plan activation, coordination of public communications during abnormal events, and contributions to the Annual Work Plan and Annual Monitoring Report;; • Maintain liaison with regulatory authorities as required; • Oversee (or delegate as necessary) corrective actions to address non-compliance; • Notify the General Manager of matters requiring review or amendment of this Plan; • Oversee and coordinate the development and implementation of the pavement maintenance plan in consultation with BDC, including ensuring baseline and post-construction pavement condition surveys are undertaken; • Oversee monitoring of road condition and ensure maintenance and repair actions are implemented in accordance with agreed arrangements with BDC; and • Coordinate preparation, maintenance, and activation of the Public Road Action Plan, including liaison with NZTA and BDC where required.
Health and Safety Manager	• Support investigation and management of traffic-related incidents and complaints from a health and safety perspective.

Position	Accountable Task
Training Supervisor	• Coordinate training for employees and contractors on traffic management responsibilities and procedures under this Plan; • Coordinate delivery of project-specific driver induction training for abnormal events, including travel on Millerton Road; and • Support the development and delivery of traffic-related training and induction content.
Supervisors	• Coordinate day-to-day traffic-related activities, including scheduling of deliveries and workforce movements to minimise traffic effects; • Implement and oversee shared transport arrangements (e.g. buses, carpooling) in accordance with this Plan; • Coordinate implementation of localised public road improvement works with contractors, where required; • Ensure day-to-day operations are undertaken in accordance with the mitigation and management measures set out in this Plan; • Provide instruction to workers on relevant traffic controls and protocols; • Identify and respond to operational activities that may increase traffic effects; • Monitor the effectiveness of traffic management measures and report issues as required; and • Implement corrective actions as directed.
All personnel	• Comply with site procedures and controls relevant to traffic management; • Report any traffic 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

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

Drivers of trucks and heavy vehicles will receive site-specific instruction relevant to their role, including traffic controls, identified hazards, and the use of driver communication protocols when travelling on constrained routes such as the Denniston Track.

In the event that coal transport is required on Millerton Road, all drivers will be required to complete a project-specific driver induction training session. This training will cover communication protocols, site-specific hazards associated with the Stockton area, and expectations for safe operation on the public road network.

Additional or refresher training may be provided where monitoring outcomes, incidents, near-misses, or changes to activities indicate that further instruction is required.

Ongoing traffic and environmental awareness will be reinforced through toolbox talks or other appropriate forums. Topics may include, as relevant:

- Traffic mitigation measures and good practice;
- Monitoring outcomes or observed trends;

- Complaints, incidents and lessons learned; and
- Changes to activities, controls, or response procedures.

This training supports the effective operation of the TARP by reinforcing the relationship between observations, trigger identification, and proportionate response actions.

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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 traffic related complaints;
- 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 9**). 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 9: Document management

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

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13.0 References

- *Bathurst Resources Limited (2025). Buller Plateaux Continuation Project – Project Description (Draft V4)*
- *Buller District Council. (2011). Buller District Plan.* https://bullerdc.govt.nz/planning/district-plan/
- *Stantec (2025). Buller Plateaux Continuation Project – Denniston Plateau Access – Integrated Transport Assessment*
- *Stantec (2025). Buller Plateaux Continuation Project – Stockton Mine – Integrated Transport Assessment*
- *Waka Kotahi NZ Transport Agency (2024). New Zealand Guide to Temporary Traffic Management*
- *Waka Kotahi NZ Transport Agency (2024).* Traffic Control Devices Manual (TCD Manual).
- *West Coast Regional Council (2023).* Te Tai o Poutini Plan (Proposed).

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Attachment 1: Summary of Commitments

Commitment ID	Commitment	Section Reference

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

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Attachment 2: Driver Communications Protocol

1. Purpose

This protocol outlines communication and coordination procedures to reduce the risk of project-related heavy vehicles encountering members of the public (including light vehicles, cyclists and pedestrians) on narrow or constrained sections of the public road network. The goal is to prevent two-way movements in these constrained areas to protect public safety.

2. Driver Communications Protocol

To prevent two-way conflicts, all Project-related heavy vehicle drivers must:

- **Approach with Caution:**
  - Slow down and prepare to stop at the designated control point or safe pull-over area before entering a known narrow or tortuous section.
- **Radio Communication (UHF radio):**
  - Broadcast the following: *"Truck [Unit Number] at [Control Point Name], preparing to enter [Section Name], heading [Direction]. Any traffic in section? Over."*
  - Wait 5-10 seconds for any response from other vehicles.
  - If no response and the section is clear, broadcast the following and proceed: *"Truck [Unit Number] entering [Section Name] now. Over."*
- **Visual Check for Oncoming Traffic:**
  - Before entering the section, conduct a full visual check for public vehicles.
  - If a vehicle is visible or entering the section, wait until it has cleared.
- **Enter the Section Safely:**
  - Drive slowly, maintain lane position, and remain alert for public vehicles or pedestrians.
  - Use headlights and hazard lights if visibility is poor.
- **Exit Communication:**
  - Upon exiting the section, call: *"Truck [Unit Number] clear of [Section Name], over."*

2.1 In Case of Obstruction or Breakdown

In the event of a truck breakdown or incident in a high-risk section:

- The driver must immediately notify mine dispatch and all other drivers via two-way radio;
- Hazard lights must be activated, and cones or signage deployed if safe to do so; and
- Public traffic must be warned using signage or, if needed, a spotter.

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2.2 Public Awareness and Notifications

To enhance road safety and reduce conflict with mine-related traffic, the mine operator will:

- Install and maintain appropriate warning signage on constrained road sections used by heavy vehicles;
- Notify the public Project-related traffic activity, including oversize loads or abnormal event haulage, via appropriate channels (e.g. signage, public notices, website updates, or local notifications); and
- Provide advance notice of temporary road closures, allowing drivers to plan alternate routes.

3. Training and Compliance

The following training and compliance requirements will apply to all Project-related truck movements:

- All truck drivers must be trained in this communications protocol;
- Additional project-specific induction training will be provided where required (e.g. abnormal events involving public road haulage such as Millerton Road);
- Periodic audits or checks will be conducted to ensure compliance; and
- Any breaches or near misses must be reported and investigated.

4. Site Manager Contact Details

For any concerns, incidents, or coordination needs related to this protocol or mine-related traffic movements, site management contact details will be made available to road users, including via signage at key access points and, where appropriate, other communication channels.

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