

Suzanne Hills comment on TCM Substantive Application – Southern Block

1. I greatly appreciate and thank the panel for the invite to comment on the TCM fast-track proposal.
2. I oppose the application for its multitude of environmental and social impacts, including the economic costs of these impacts. In my submission I have focussed on one issue: cycling the Coast Road.
3. I am a cyclist and travel approximately 1850km annually on my ebike, the vast majority of which is along the Coast Road of SH6 between Barrytown and Greymouth i.e. on the proposed mine haulage route.
4. Much of the Coast Road along the proposed mine haulage route lacks a cyclable road shoulder, where trucks and larger vehicles cannot safely overtake cyclists without crossing the centre line. They regularly do so on solid yellow lines, risking head on collisions. It is unusual for truck drivers to slow down and wait for a section of road where they can pass safely – campervan and car drivers often do, but commercial vehicle drivers seldom do so.
5. Another 50 trucks per day on this section of the Coast Road for decades to come vastly increases risk exposure for cyclists. A serious accident or fatality is inevitable – in short, without effective mitigation, this proposal will cost lives.
6. There are currently no cycleways along the proposed mine haulage route, leaving cyclists with no alternative but to use SH6. Currently, SH6 is just manageable to cycle safely if one is a confident cyclist with quick reactions, and precautionary measures are taken. Mine include: looking in a wide angled rear view mirror at every blind corner and pinch point; using cycling sign language to encourage drivers to slow down to pass; signage at the back of bike reminding people to share the road and give 1.5m; and an arrow pole extending 0.5m perpendicular out from the back of the bike. The other main option to maintain safety is to avoid the milk tanker convoy travelling north at approximately 5-6.30pm (and at 5-7am) during milking season. I also regularly ‘take the lane’, as is my legal right, if I am concerned that a driver is likely to attempt to overtake me when it is unsafe to do so.
7. My overall average speed is 22km/hour. I travel at anywhere between 20-35km/hr along the flat, up to 50km/hr downhill, and about 15km/hr uphill. On average I’m travelling 10-15km/hr faster than a regular bike. Most drivers are not familiar enough with the speed of ebikes and consequently underestimate their speed when overtaking – this can lead to being caught in a dangerous pinch point. To avoid this, when I see or know there’s a pinch point ahead, I usually take proactive safety action by cycling on the meridian side of the road shoulder white line to maintain the position I need ahead which is without an adequate road shoulder – the consequence of this is that most vehicles need to cross the meridian line to pass me.
8. I am a considerate cyclist and cycle as near as practicable to the left side, but not so far left that it affects my safety. As much as the road shoulder allows, I ride the solid white line. When there is room to ride on the road shoulder I always take it unless it leads to the situation described above. However, the norm for Coast Road along the proposed mine

haulage route is a road shoulder of less than 0.5m, often non-existent, – it is not enough to ride safely and I am normally either riding the white line or on the road meridian side of it.

9. I note the Land Transport (Road User) Rule 2004 section on Passing states:

2.6 General requirements about passing other vehicles

(1) A driver must not pass or attempt to pass another vehicle moving in the same direction unless—

(a) the movement can be made with safety; and

(b) the movement is made with due consideration for other users of the road; and

(c) sufficient clear road is visible to the driver for the passing movement to be completed without impeding or being likely to impede any possible opposing traffic; and

(d) until the passing movement is completed, the driver has a clear view of the road and any traffic on the road for at least 100 m in the direction in which the driver is travelling.

(2) Subclause (1)(c) and (d) does not apply if the passing vehicle and the vehicle being passed are in different lanes and are, throughout the passing movement, either on a one-way road or on the same side of the centre line.

(3) A driver must not, when passing another vehicle moving in the same direction, move into the line of passage of that vehicle until the manoeuvre can be made safely and without impeding the movement of that other vehicle.

2.9 Passing where roadway marked with no-passing line

(1) This clause applies if a driver is at or approaching a portion of a roadway where the road controlling authority has, in accordance with any enactment, marked a no-passing line applying to traffic moving in the direction in which the driver is moving.

(2) The driver must not pass or attempt to pass a motor vehicle or an animal-drawn vehicle moving in the same direction within the length of roadway on which the no-passing line is marked until the driver reaches the further end of the no-passing line, unless throughout the passing movement the driver keeps the vehicle wholly to the left of the no-passing line.

https://www.legislation.govt.nz/regulation/public/2004/0427/55.0/DLM303048.html?search=sw_096be8ed815e936c_Passing_25_se&p=1

10. While 2.9(2) states that crossing yellow no-passing lines only applies to motor vehicle or an animal-drawn vehicles, and therefore drivers may cross a no-passing line when passing a cyclist, 2.6 (1) (a), (b), (c), (d) and 2.6(3) still applies to drivers passing cyclists. A vehicle in the Land Transport (Road User) Rule 2004 has the same definition as the Land Transport Act 1998, where a bicycle clearly is one.
11. Due to much of the Coast Road lacking a rideable road shoulder, trucks cannot safely overtake cyclists without crossing the road meridian line. Truck drivers regularly overtake on yellow no-passing lines. It is rare for them to slow down and wait for a section of road where they can pass safely and fully comply with 2.6 (1) (a), (b), (c), (d) and 2.6(3).

12. Nearly every single time I cycle on SH6 (on a trip greater than about 5km) I witness at least one dangerous overtaking manoeuvre, often by truck drivers. I submit the video Cycling the Coast Road as evidence. I took video footage throughout 2023 and 2024 while riding the Coast Road with a sports camera installed on my handlebars. I had difficulty getting footage of trucks because to start the video required to twice-press a button on the camera, leaving me riding one-handed. To maintain control of the bike and prepare for the suction effect of passing trucks, I would need to ride with both hands on the handlebars, my safety overriding the video collection. Thus, the footage is skewed to light vehicles compared to the actual incidence of overtaking by trucks. [Note: the camera had limited battery capacity and I could not leave the video running continuously]. Link to Cycling the Coast Road video: https://drive.google.com/file/d/1Wu90jznNGREz921-xRftyK_8Nxp10K9i/view?usp=sharing
13. I have witnessed several occasions where a vehicle travelling in the opposite direction has had to slow down or stop to avoid a collision with a vehicle overtaking me (one of these incidences is recorded on my video evidence Cycling the Coast Road). I have also been in situations where vehicles are travelling at speed directly towards me on my side of the road as they complete an overtaking manoeuvre. Both contravene 2.6(1)(c). I believe most local drivers are taking unacceptable risks because SH6 currently has a relatively low traffic volume and these dangerous manoeuvres (very fortunately) seldom end up with consequences. This will certainly no longer be the case if this fast-track application is granted.
14. I note that carrying weight as a cyclist increases risk. With added weight in panniers or a backpack, there is a greater risk of ricocheting off a small rock or crumbling road shoulder if forced into evasive last-seconds action to avoid dangerous over-taking. Ricocheting can result in cyclists crashing off their bikes and/or being flung into traffic.
15. Add another 50 trucks and 140 light vehicles per day on this section of the Coast Road and every one of those additional vehicles, particularly the trucks, will create additional risk. It is inevitable that this situation will result in a serious accident or fatality. This proposal will cost lives. I am not stating this to be melodramatic, it is a statement from a factual basis of my 12,900km lived experience cycling the Coast Road. I ask that this lived experience is given significant weight – it is real practical experience and I certainly wish to continue living the experience and not be left as ‘lived’ – either because I suffer a serious injury or die, or I have to give up cycling the Coast Road because it becomes far too dangerous even for the most committed cyclists like myself. The severity of the risk of serious injury or death to cyclists, pedestrians or motorists is far too costly for this proposal to be granted. The Coast Road would become a mine haulage route – essentially an extension of the mine operation, and from a road safety perspective this is an entirely untenable health and safety risk.
16. From my average 1850 km/year, and average speed of 22km/hr, I cycle about 84 hours/year on the Coast Road. Based on an average of five trucks per hour this would expose me to an additional 420 truck encounters p.a. (note: trucks passing in either direction are a potential risk to cyclists because of (amongst other reasons) other vehicles overtaking them and cyclists ending up in a head-on situation). Over the anticipated 20 years of mining (14 years from this fast track and 6 years from the Central Block), this would expose me to 8,400 additional trucks. I would be exposed to further risk from the proposal's other heavy vehicles during the pre and post mining sequences, and other additional heavy vehicles such as fuel

tankers operating during the entire 35-50 year life of the project. This is a notable increase of exposure to risk for me personally; the cumulative exposure to risk for all Coast Road cyclists would be substantial.

17. Because of my love of cycling and my somewhat obstinate nature, I would be extremely reluctant to discontinue cycling the Coast Road. For myself, I fear it would take a frightening near miss or suffer a moderate to serious injury before I would give up. To that end, if this proposal was granted I can see myself frequently having to 'take the lane' as is my legal right. The road code states: *Cyclist may take the lane when road is too narrow for motor vehicles to safely pass them.* To maintain my safety, I would have to 'take the lane' when trucks approach from the rear on the numerous and lengthy sections of SH6 where there is not an adequate road shoulder and is without a 100m line of sight. This would seriously disrupt the efficient operation of SH6. I am not making this statement as my intention to deliberately disrupt the efficient operation of SH6, rather the need to 'take the lane' will be the factual reality to preserve my life.
18. Cycling, including ebikes, is one of the most carbon efficient means of transport – both in terms of the embedded carbon of the bike and the zero operational emissions if charging from renewable energy. Ebikes in combination with urban design have the potential to play a significant part in decarbonising our transport sector. The same can be said for the rural area of the Coast Road. If we continue to invest in safe cycling infrastructure on the West Coast, it will become commonplace for people to swap car journeys for bike journeys. But granting this proposal and allowing SH6 to be dominated by diesel fuelled mining trucks will be a major setback for Coast Road cycling – including a burgeoning cycle tourism industry.
19. I feel very fortunate to have grown up in the 70s and 80s where children could cycle unsupervised and most kids rode their bikes to school. I feel a strong sense of intergenerational responsibility to uphold a cycling future for the Coast Road, so new generations of rangatahi have the option of cycling to their school, recreational activities, and friends and family without the extreme risk of serious injury or death. It is intolerable that a sole proposal in one single step change doubles the truck movements (and adds additional light vehicle movements) and threatens the viability of cycling the Coast Road and with it creates a high-impact present and future adverse effect on our young people.
20. For many, the applicants proposal will create a Coast Road simply too dangerous to cycle. The loss of cycling's positive benefits would have negative impacts on local people's health and wellbeing, and their emissions reduction. It would also have significant adverse effects on a burgeoning cycle tourism industry.
21. State highway 6 operates as a complex system and the applicant cannot mitigate mortal risk to cyclists through driver behaviour and training. This is acknowledged by Waka Kotahi in Mr Geddes s42a Officers Report for the TiGa application, paragraph 167: *After receiving some conflicting advice from Waka Kotahi multi-nodal team in relation to potential adverse effects on cyclists, I received the following comments from Waka Kotahi on 23 November 2023: "As discussed, the experts from our Multi-modal team have differentiating views as to how trucks/vehicles react when cyclists are on the road in locations such as this on the West Coast. Every vehicle passing a cyclist on a road where this is limited shoulder does result in some potential safety risk no matter the road, but the behaviour of a cyclists and/or the*

motorist can differentiate between people and whether they have received specific training. Generally, this is a complex matter to understand and we don't have any input from a Behaviouralist Expert to provide us advice to pass on. Unfortunately the advice that was passed on may not be helpful to come to a view on this matter and it may need to be explored further if required." I attach Mr Geddes s42a Officers Report with my comment.

22. With my 12,900km cycling the Coast Road, I see this differentiating behaviour amongst commercial drivers all the time. There is no evidence to suggest that all commercial drivers comply with the road code and behave respectfully and in a safe manner towards cyclists all of the time. For example:
- I have had a frightening experience with a Mainfreight truck at the Taylorville turnoff. Southbound, the turnoff to Taylorville is to the left with a right hand bend continuing to Greymouth. It is dual lane, requiring cyclists to move to the right lane to continue on to Greymouth. Cyclists are left in a vulnerable pinch point with potential overtaking traffic on their right and left. At this very point, a Mainfreight truck overtook me (on my right) travelling both at speed and too close; so close and fast that I felt a strong suction effect and was left very shaken.
 - There is a high variability of driver behaviour amongst milk tanker drivers. Sometimes they slow down and follow me until they can pass safely; other times they slow down to pass and do so at a safe distance; other times they do not – passing either too fast or too close or both. They often cross no-passing lines with the consequence is they often cut back onto the left hand side of the road (probably because they lack the required 100m forward view of 2.6(1)(d)) and often this impedes my movement (contravening 2.6(3)) – by forcing me off the road and/or having to slam on the brakes. It is likely a number of factors are at play influencing driver behaviour including: the individual driver, how they feel on the day, how much time pressure they may be under, how much other traffic is on the road, weather conditions etc.
23. Because SH6 is a complex system, even if all drivers complied with the road code all of the time (particularly passing rules of 2.6(1)(a), (b), (c), (d) and 2.6(1)(d)) and always drove in a considerate manner towards cyclists, this would not eliminate the significant increased serious injury and mortal risk to cyclists from the proposal. The safety of cyclists on SH6 is composed of many components which interact with each other. For example, a TCM truck slowing down and following behind a cyclist for a lengthy period, would likely result in another driver following the TCM truck becoming frustrated and attempting a dangerous overtaking manoeuvre.
24. TCM truck drivers doing the same route day after day, would likely become desensitised to the risks of the Coast road network. The safety of cyclists is dependent on driver behaviour. How would TCM ensure drivers maintain safe driving conduct when the drivers are doing the same run day in & day out? How would they prevent drivers becoming immune to the risk their driving behaviour poses to cyclists? How will the drivers remain vigilant at all the "locations of care" when there are so many of them along the Coast Road?
25. No amount of driver training and awareness, real-time driver communication, and road safety signage will adequately mitigate the risk to cyclists from this fast-track project. As an experienced Coast Road cyclist, the only way the significantly increased serious injury and

mortal risk can be mitigated is by a separate combined walkway/cycleway along the length of the proposed mine haulage route. Failing this, as an absolute bare minimum, all high risk sections along the proposed mine haulage route, such as: blind corners; pinch points; and other tight geometry without a 100m line of sight; should be widened to provide a rideable road shoulder with a minimum 0.5m width. According to Land Transport rules, cycle lanes should be provided if there is “insufficient width for heavy vehicles and cyclists to share the road safely”. s5.3(2)d p14. <https://www.nzta.govt.nz/assessments/resources/road-traffic-standards/docs/rts-16.pdf>

CONCLUSIONS

26. As a regular and dedicated Coast Road cyclist, my opposition to this application is literally a fight for my life.
27. Should this proposal be granted and SH6 be used as a mine haulage route, the only effective mitigation for serious injury and mortal risk to cyclists is a separate cycleway.
28. Failing this, SH6 needs to be widened to provide a minimum 0.5m wide rideable road shoulder at all high risk sections of: blind corners; pinch points; and other tight geometry without a 100m line of sight.
29. Without the above mitigation, it is inevitable that the proposal will result in serious injury or fatality: it will destroy lives.
30. If the panel see fit to grant this application, consent conditions of a separate cycleway or road widening need to be included.

Attached: Mr Geddes s42a Officers Report for TiGa application