

Before an Independent Hearing Commissioner at Westland District Council

*under:* the Resource Management Act 1991

*in the matter of:* Variation to land use resource consent application  
220119 to allow for the commercial use of a building  
within the rural zone and general rural zone at 240  
Taramakau Highway

*between:* **BM Loader**  
*Applicant*

*and:* **Westland District Council**  
*Consent Authority*

Joint witness statement in relation to Minute No.7 of Independent  
Commissioner (11 November 2025) – Transport Matters

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Dated: 20 November 2025

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## INTRODUCTION

- 1 This Joint Witness Statement (JWS) is at the request of the Independent Commissioner Minute No.7, dated 11 November 2025.
- 2 This statement records the post-hearing consideration of the issues raised in Minute No.7 by the two traffic experts, as follows:
  - (a) Ms Alexandra Mace-Cochrane, Transport Engineer (Novo Group), for BM Loader; and
  - (b) Mr Karl Jackson, Transport Manager, for Westland District Council.
- 3 Conferencing took place on the 19<sup>th</sup> November 2025 via an online meeting. Also present at the meeting were:
  - (a) Mr Rhys Chesterman, Transport Engineer/Director (Novo Group), for BM Loader;
  - (b) Ms Anna Johnson, Planner, for BM Loader;
  - (c) Ms Kate Fleming, Business Support Officer Planning, for Westland District Council;
  - (d) Ms Joy Cowan, Business Support Officer Planning, for Westland District Council;
  - (e) Ms Stephanie Tangimetua, Planning Team Leader, for Westland District Council; and
  - (f) Mr Joubert Bekker, Consultant Planner, for Westland District Council.
- 4 Specifically, Minute No.7 refers to two outstanding transport issues. These relate to (i): inconsistencies in the transport material; and (ii) the need for further input from NZTA. These two issues are discussed below.

## INCONSISTENCIES IN TRANSPORT MATERIAL

- 5 Minute No.7 notes the following issue raised by Councils transport expert:
 

*Inconsistencies in the transport material (e.g., the "standard dwelling" daily-movement comparator vs the assumed daily volumes on the affected local roads, and limited treatment of active-mode effects near the West Coast Wilderness Trail)*
- 6 Mr Jackson highlighted his concerns around inconsistencies in the method used in determining the existing traffic volume.

- 7 Ms Mace-Cochrane noted that Mobile Road, which derives traffic volumes from the Council's RAMM<sup>1</sup> database, has been used in the original Integrated Transport Assessment (ITA) and Addendum 1, as well as some sections of Addendum 2. However, it is also acknowledged that Paragraph 5 of Addendum 2 calculated a traffic generation of a standard residential dwelling using a rate of ten vehicles per day (veh/d).
- 8 The rate of 10veh/d per dwelling is derived from the New Zealand Transport Agency's Research Report (NZTA) 453 *Trips and parking related to land use*, and is typically used to estimate traffic generation rates associated with a proposal (where a relevant land use category exists) or to estimate the existing volume of the road where Council does not have data available in Mobile Road or traffic tube count site data available.
- 9 Mr Jackson notes that no other traffic data, aside from that in Mobile Road, was available, so for completeness, we agreed to provide an existing traffic volume for Greymouth Kumara Tramway and Kahikatea Place using a rate of 10veh/d.
- 10 Based on aerial imagery, there appears to be six residential dwellings with access to Kahikatea Place and six with access to Greymouth Kumara Tramway (noting one of these has a State Highway 6 address rather than a Greymouth Kumara Tramway address). This equates to an estimated volume of 60veh/d on Kahikatea Place, 60veh/d on Greymouth Kumara Tramway (southeast of the Kahikatea Place intersection), and 120veh/d on Greymouth Kumara Tramway (northeast of the Kahikatea Place intersection). This quantum of traffic is (still) low.
- 11 Ms Mace-Cochrane and Mr Jackson both agree that the existing traffic volume on Greymouth Kumara Tramway and Kahikatea Place is low, such that the traffic generation by the proposal will have inconsequential effects on the surrounding road network.
- 12 Mr Jackson raised no other concerns regarding inconsistencies in the transport material.

#### **NZTA INPUT**

- 13 NZTA have provided their (revised) written approval for the current application. This constitutes written approval under Section 95E of the Resource Management Act 1991 and is attached as **Appendix 1**.

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<sup>1</sup> For clarity, this is a geospatial asset management software which is used by Councils across New Zealand to manage roading and other infrastructure.

- 14 Minute No.7 has separately sought clarification from the applicant's transport expert in relation to this issue. The comments below are therefore provided from Ms Mace-Cochrane only:
- 14.1 *The original ITA provided commentary and an assessment of sight distance in Paragraph 36-42. This has been accepted by NZTA (specifically page 2, bullet point 6) in their formal written approval. NZTA are the road controlling authority, and their written approval means the Council must disregard any adverse effects on that person.*
- 14.2 *I specifically note that NZTA endorse the need for detailed records to be maintained for the first 12 months following operation, and also the need for a Transport Management Plan (TMP) to be implemented for events that have more than 105 guests. This has been agreed to by the Applicant and should form Conditions of Consent.*
- 14.3 *The TMP is the key mitigation to ensure that vehicles do not spill over into the surrounding road network. In my opinion, this can be successfully implemented, and Council have the ability seek confirmation and/or monitor and seek variations if issues arise.*
- 14.4 *With regard to the Wilderness Trail, I also note that this runs alongside State Highway 6 before linking with Greymouth Kumara Tramway. NZTA have not raised any concerns in relation to this matter. There are good lines of sight on both roads to and from this trail/path, noting the path ceases approximately 19.0m from the limit line of Greymouth Kumara Tramway, as shown in **Figure 1**, and the safety of path users is unlikely to be compromised by the proposal. This is also reflected by the low traffic volumes on the road, low volume of users on the trail, the low volumes generated by the proposal, and the lack of any existing crash history. It is also noted that given its position near the intersection, this can also be reviewed under the monitoring condition imposed by NZTA.*



**Figure 1.** Location of the West Coast Wilderness shared-use path ceasing on Greymouth Kumara Tramway.

Dated: 20 November 2025

*Alexandra Mace-Cochrane*

Alexandra Mace-Cochrane

A handwritten signature in blue ink, appearing to read 'Karl Jackson', written over a horizontal line.

Karl Jackson

**Appendix 1 – NZTA Written Approval (18 November 2025)**

NZ Transport Agency Waka Kotahi Reference: Application-2024-0606

18 November 2025

Beverly Loader  
C/- Anna Johnson  
Scoped Planning and Design  
165 Jollie Street, Hokitika

Sent via Email: anna@scoped.nz

Dear Anna,

**Affected Party Approval Request – 240 Taramakau Highway, Kumara Junction, Greymouth, West Coast – Beverly Loader**

Thank you for your request for written approval from NZ Transport Agency Waka Kotahi (NZTA) under section 95E of the Resource Management Act 1991. Your proposal has been considered as follows:

**Proposal**

Resource consent is sought to vary the consent conditions of existing resource consent application RC220119. The original resource consent was granted for the construction of an oversized nonfarming building (Melody Hall) and utilisation of a section of road reserve for parking within the Rural Zone. This consent has the following transport related conditions:

- No more than 16 vehicles parked on the site at any one time.
- A maximum of 5 community events per calendar year.
- No commercial activity and no staff.
- Events required to finish no later than 00:00 (midnight),

This consent was considered to have catered for approximately 52 vehicle movements per day.

The Applicant has requested to vary the above conditions as follows to provide more flexibility in use of the Hall:

- Confirm the Hall can be used on four set days a week and public holidays, where not restricted by alternative national requirements.
- All events (excluding occupation for civil defence emergency responses) must be limited to the following hours of operation:
  - Thursday: 8:00am – 9:00pm
  - Friday and Saturday: 8:00am – 12:00am (midnight)
  - Sunday and Public Holidays: 8:00am – 7:00pm

All attendees must vacate the site and all event related activities, including pack- down, shall cease by the end of each respective time period.

- To increase the number of parking spaces on-site to 38 (22 space increase).
- To allow some commercial activities (e.g., weddings) with a maximum of 30 events annually, being commercial or community, with up to 12 civil defence meetings/trainings per year (once a month maximum) in addition to the 30 events and the use of the hall for emergency management.

- The maximum number of guests will be 150 per event, with a maximum of 6 staff (total 156).
- Vehicular access to the hall will continue to be via Greymouth-Kumara Tramway.

### **Assessment**

In assessing the proposed activity, NZTA notes the following:

- Direct access to Melody Hall is via Greymouth-Kumara Tramway (local road).
- Greymouth-Kumara Tramway interacts with State Highway 6 (SH6) via an existing intersection. This intersection does not meet the sightline distance requirement of 300m as recommended within the NZTA Planning Policy Manual for a 100km/hr speed environment.
- A total of 38 parking spaces are proposed on-site and no spill-over parking is allowed. A condition of consent has been proposed by the applicant to ensure the activity will not lead to on-street parking that could otherwise lead to adverse effects (see Condition 2 for more information).
- An Integrated Traffic Assessment (ITA) that was prepared by Novo Group Ltd notes that the maximum occupancy of the site for community events and gatherings is likely to be 76 people per day with a peak hour generation of 38 vehicles per hour and a daily traffic generation of 76 vehicles per day. However, depending on the nature of the community use, it is possible that more than one activity could be held daily at Melody Hall. Assuming full occupancy of the activity, the ITA considers one activity could be held in the morning, one in the afternoon and one in the evening. Therefore, three activities could occur on any given day of operation. It was therefore concluded that the worst-case traffic generation scenario for community activities (three in one day) results in an overall traffic generation of 288 vehicle trips per day.
- Based on the set-up and pack down required for weddings and events, and given there is only one building at Melody Hall, it is assumed that no other events would occur at the site when a wedding is held. It was therefore, determined that the worst-case traffic generation scenario for a wedding would result in an overall traffic generation of 96 vehicles per day.
- Given the reduced sightlines at the Greymouth-Kumara Tramway intersection with SH6 and the significant vehicle movements that could theoretically be possible as a result of this proposal it was considered that the intersection with SH6 would need to be upgraded to mitigate any adverse effect on the state highway network. However, NZTA understands that although these movements are possible, they are a worst-case scenario and unlikely to be reflective of the true use of the hall.
- A review condition has been promoted by the applicant to monitor whether there are likely to be any adverse traffic safety effects on the state highway network over a set period of 12 months and if any mitigation would then be required before continuation of the activity. The review condition will be used to understand how the hall operates, including how often events occur and associated vehicle movements from SH6 (see Condition 1 for more information).
- In assessing traffic generation and the number of occupants the site can accommodate, the ITA notes that the site could readily accommodate an event of up to 105 guests and three staff members. In order to provide more flexibility in order to cater for events with over 105 guests, the ITA recommends a condition of consent that will ensure that a Transport Management Plan (TMP) will be implemented, and this has been volunteered by the applicant.

### **Conditions**

In discussion with NZTA your client has agreed to include the following conditions as part of your client's resource consent application. The legal name of NZTA is the **New Zealand Transport Agency**; therefore, our full legal name is referred to in the conditions and approval.

1. The consent holder shall maintain detailed records of the Hall's operations for a period of 12 months, commencing from the start date of the activity. These records shall include the timing and frequency of events, the number of visitors, and parking occupancy. The records shall be made available to the New Zealand Transport Agency upon request. If the records indicate that events coincide with any known safety incidents, such as crashes or near misses, New Zealand Transport Agency may, at the consent holder's expense, request a road safety report or audit. This report will evaluate the SH6/Greymouth Kumara Tramway intersection and provide recommendations to improve safety. These recommendations may include adjustments to the timing, duration, and frequency of future events, or other physical improvements to the road network. In further consultation with the New Zealand Transport

Agency, the consent holder shall take immediate and practical steps to implement the recommended safety improvements.

2. For any event hosting more than 105 guests, the event organiser must agree to a Transport Management Plan (TMP) that must include, but is not limited to, the following elements: Beverley Loader 240 Taramakau Highway, Kumara Junction novogroup.co.nz
  - a. A requirement for minibuses to transport guests to and from the event (noting there is no space available on-site to accommodate coach parking).
  - b. Allocation of on-site parking spaces to minibus drop-off and pick-up.
  - c. Communication to guests advising them not to drive to the event, as minibus services will be provided.
  - d. Communication to guests advising them of the minibus schedule, pick-up and drop-off points, and any other relevant details.

*Advice Note: The Council may seek confirmation that a Transport Management Plan is being implemented when required and monitoring of occupancy is being undertaken. Furthermore, Council may request evidence that the adjacent road network is not being used to accommodate parking associated with this activity and seek to vary the Conditions if issues are arising.*

### **Determination**

On the basis of the above assessment of the proposed activity, and the conditions volunteered by the applicant, the New Zealand Transport Agency provides written approval under section 95E of the Resource Management Act 1991.

### **Expiry of this approval**

Unless resource consent has been obtained this approval will expire two years from the date of this approval letter. This approval will lapse at that date unless prior agreement has been obtained from the New Zealand Transport Agency.

If you have any queries regarding the above or wish to discuss matters further, please feel free to contact the Environmental Planning team at [environmentalplanning@nzta.govt.nz](mailto:environmentalplanning@nzta.govt.nz).

Yours sincerely,

Kate Bonifacio



Planner

Poutiaki Taiao / Environmental Planning, System Design, on behalf of NZ Transport Agency Waka Kotahi.

Enclosed:

- Attachment 1: Proposed Site Plan

# Attachment 1: Proposed Site Plan

