

**From:**  
**To:** [Hearings](#)  
**Cc:** [Edwina White](#)  
**Subject:** HPE CM: Notifications Consent Submission: Group 542  
**Date:** Monday, 20 April 2020 1:13:15 PM  
**Attachments:** [BRL-submission-20-April-2020.docx](#)

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**Group ID: 542**

**Consent name:** Bathurst Coal Limited

**Consent number:** CRC184166, CRC200500, CRC201366, CRC201367, CRC201368, CRC203016, RC185622

**Name:** Richard Friedman

**Care of:**

**Mailing address 1:**

**Mailing address 2:**

**Suburb:**

**Town/City:**

**Post-code:**

**Country:**

**Mobile phone:**

**Work phone:**

**Home phone:**

**Email:**

**Contact by email:** Yes

**Is a trade competitor:** No

**Directly affected:** Yes

**Consent support/hearing details**

- CRC184166: support | WANT to be heard | will NOT consider joint hearing
- CRC200500: support | WANT to be heard | will NOT consider joint hearing
- CRC201366: support | WANT to be heard | will NOT consider joint hearing
- CRC201367: support | WANT to be heard | will NOT consider joint hearing
- CRC201368: support | WANT to be heard | will NOT consider joint hearing
- CRC203016: support | WANT to be heard | will NOT consider joint hearing
- RC185622: neither | WANT to be heard | will NOT consider joint hearing

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**Reasons comment:**

I oppose Bathurst Resources Ltd's application (RC185622) in part because I have considerable concerns about the safety of Routes 1, 2 and 3. Of the corners on Malvern Hills Road (Route 1) there are approximately six corners that truck and trailer combinations have to travel on the centre line to keep their trailer rear axle sets on the carriage way. I oppose the use of Route 2 unless the Cutting on Malvern Hills Road (starting at the Bush Gully Stream bridge and running north) is widened to allow two trucks to pass each other or for a traffic management system to be operative when coal trucks are using this route. I oppose the use of Route 3 because the road is too narrow over most of its length and there are many blind and narrow corners.

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**Consent comment:**

1. The tight corners on Route 1 be widened and the reverse camber on two other corners be corrected. 2. The dust suppression to continue for the entire length of the unsealed portion of Route 1. 3. Dust suppression to be applied if Route 2 has to be used. 4. The sealed portion of Malvern Hills Road, from the Kirkstyle Homestead driveway to the shingle, be widened to allow large vehicles to pass each other and not to have to leave the seal. 5. The Cutting on Malvern Hills Road (Route 2), north of the bridge at Bush Gully Stream, be widened to allow two large vehicles to pass one another. 6. That Route 3 be deleted as an option.

20 April 2020

**RICHARD FRIEDMAN**

I oppose Bathurst Resources Ltd's application for RC 185622 in part.

I do not oppose BRL operating Canterbury Coal in the hills behind Whitecliffs/Glentunnel.

I have considerable concerns about the safety of Routes 1, 2 and 3.

**ROUTE 1** (Malvern Hills Road/Bush Gully Road)

My concerns are vehicles crossing the centre line and dust.

An earlier report by Abley Ltd for BRL recommended that "multiple curves would benefit from better delineation". I agree with this observation.

Of the corners on Malvern Hills Road, there are approximately six (6) that truck and trailer combinations have to travel on the centre line in order to keep their trailer rear axle sets on the carriage way.

On the sealed section of Malvern Hills Road large vehicles, when approaching one another, have to slow and one vehicle has to stop while the other vehicle carefully passes it.

Malvern Hills Road has high heavy vehicle movements, in particular associated with logging operations, over periods lasting six to eight weeks each year. It should be noted that the logging associated heavy vehicle movements have a higher daily total than those associated with BRL.

The Selwyn District Council has failed to provide a fit-for-purpose roadway for heavy vehicles and other users. I believe that the SDC must provide a roadway that allows for safe passage for all vehicles.

I ask that the current practice of spraying water on Route 1 to suppress dust continue.

**ROUTE 2** (Bush Gully Road/Malvern Hills Road/Auchenflower Road)

I acknowledge BRL's requirement for an alternative route should Route 1 be closed.

However, I oppose the use of Route 2 unless the Cutting is widened to allow two trucks to pass each other or for a traffic management system, that keeps all road users safe, to be operative when coal trucks are using this route.

I ask that, if Route 2 is used, dust be suppressed by spraying water on the entire route.

**ROUTE 3** (Bush Gully Road/Malvern Hills Road to Sheffield)

I oppose the use of this route because the road is too narrow over most of its length and there are many blind and narrow corners.