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RECEPTION		
EC - CHCH		
FILE REF:		
DOCUMENT No:		
19 NOV 2008	ACTION	INFO
FURTHER SUBMISSION ON VARIATION 4 TO PROPOSED CHANGE NO 1		
TO THE CANTERBURY REGIONAL POLICY STATEMENT		
Clause 8 of First Schedule, Resource Management Act 1991		

FURTHER SUBMISSION ON VARIATION 4 TO PROPOSED CHANGE NO 1
TO THE CANTERBURY REGIONAL POLICY STATEMENT
Clause 8 of First Schedule, Resource Management Act 1991

1187

To: Environment Canterbury
PO Box 345
Christchurch

Name of submitter: INDEPENDENT FISHERIES LIMITED (IFL)

Address for service: C/- Goodman Steven Tavendale Reid
PO Box 442
Christchurch 8140

Attention: Pru Steven

Phone: 03 374 9999
Fax: 03 374 6888

1 This is a further submission in support of a submission on:

Variation 4 to Proposed Change No 1 to the Canterbury Regional Policy Statement.

2 The submitter supports the submissions of the following submitters:

Eric Lin Submission No 15
C/- Robson Garland Limited
PO Box 13539
Christchurch 8141

W K Macdonald Family Trust Submission No 141
C/- Fiona Aston Consulting Limited
PO Box 1435
Christchurch 8140

3 The particular parts of the submissions supported are:

The whole of the submissions.

4 The reasons for this submission in support are (including but not limited to):


For all of the reasons raised by IFL in its original submission to Variation 4.

5 Independent Fisheries Limited seeks that the whole of the submissions be allowed.

6 Independent Fisheries Limited wishes to be heard in support of its further submission.

7 If others make a similar submission Independent Fisheries Limited would be prepared to consider presenting a joint case with them at any hearing.

Dated this 19th day of November 2008.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke at the end, positioned above a horizontal line.

P A Steven
Counsel for Independent Fisheries Limited

VARN (4)

EC - CHCH		
FILE REF:		
DOCUMENT No.		
19 NOV 2008	ACTION	INFO

FURTHER SUBMISSION ON VARIATIONS 1, 2 AND 4 TO PROPOSED CHANGE NO 1 TO THE CANTERBURY REGIONAL POLICY STATEMENT

Clause 8 of First Schedule, Resource Management Act 1991

SUTC-95
106025

To: Environment Canterbury
PO Box 345
Christchurch

Name of submitter: INDEPENDENT FISHERIES LIMITED (IFL)

Address for service: C/- Goodman Steven Tavendale Reid
PO Box 442
Christchurch 8140

Attention: Pru Steven

Phone: 03 374 9999
Fax: 03 374 6888

1 This is a further submission in opposition to a submission on:

Variations 1, 2 and 4 to Proposed Change No 1 to the Canterbury Regional Policy Statement.

2 The submitter opposes the submission of:

Christchurch International Airport Limited (CIAL) Original Submission No 236
C/- Jo Appleyard
Chapman Tripp
PO Box 2510
Christchurch 8140

3 The particular parts of the submission opposed are:

The whole of the CIAL submission. In particular, IFL oppose the following:

Variation 1

(a) Submission No 236.28 – (CIAL seek amendments proposed by 1.1-1.5 of Variation 1).

Variation 2

(b) Submission No 236.31 – (CIAL seeks to retain Map1, sheets C6 and C7 as proposed by Variation 2, Amendments 2.4 and 2.5).

- (c) Submission No 236.29 – (CIAL seeks to retain new definitions of *Noise Sensitive Activities* and *Deferred Noise Sensitive Activities* proposed by amendment 2.3 in Variation 2).
- (d) Submission No 236.30– (CIAL seeks the amendment of the definition of *Mixed Activity Area* proposed by Amendment 2.3 in Variation 2.

Variation 4

- (e) Submission No. 236.37 – (CIAL seeks the adoption of amendment 4.7).
- (f) Submission No 236.39 and 40 – (CIAL seeks the adoption of amendment 4.9).
- (g) Submission No. 236.38 – (CIAL seeks the adoption of amendment 4.8).
- (h) Submission No. 236.42 – (CIAL seeks the adoption of amendment 4.10).
- (i) Submission No. 236.35 – (CIAL seeks to update amendment 4.6 to include reference to Map 1 and include the revised Ldn 50dBA contour).
- (j) Submission No 236.32 – (CIAL seeks to amend the explanation in amendment 4.1).
- (k) Submission No 236.36 – (CIAL seeks to adopt amendment 4.2).
- (l) Submission No 236.34 – (CIAL seeks to amend Policy 15 (d) in amendment 4.4).
- (m) Submission No 236.43 – (CIAL seeks to retain the new definition of Noise Sensitive Activities as proposed by amendment 4.5).

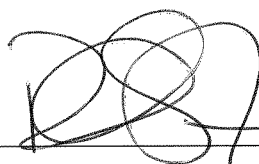
4 The reasons for this submission in opposition are (including but not limited to):

- 4.1 Those reasons relevant and outlined in the original submission of IFL.
- 4.2 The limitations and constraints imposed on land use activities by the adoption of this submission are not necessary to achieve an appropriate level of protection from reverse sensitivity.
- 4.3 Such limitations cannot be justified in terms of effects.

- 4.4 By preventing a range of development options, if adopted the CIAL submission would give insufficient regard to enabling people and their communities to provide for their well being.
- 4.5 In short allowing the CIAL submission would not meet the sustainable management purpose of the Act.
- 4.6 With particular reference to the amendments sought by CIAL in paragraphs 9.1, 9.2 and 9.3 of its Original Submission (namely to the explanation to Policy 1, Policy 13 and Policy 15), the words sought to be inserted "*future uncurfewed safe and efficient*" operation of Christchurch International Airport are unclear and ambiguous.
- 4.7 There is no opposition raised to an amendment that makes it clear that the noise contours (whatever contour is ultimately adopted) are based on future noise exposure and do not depict current noise levels. However this is not the meaning clearly conveyed by the words sought to be introduced by CIAL. There are clearer ways of amending the policies to make it clear that the noise contour represents a future (and not current) noise exposure.

- 5 Independent Fisheries Limited seeks that the whole of the CIAL submission be disallowed.**
- 6 Independent Fisheries Limited wishes to be heard in support of its further submission.**
- 7 If others make a similar submission Independent Fisheries Limited would be prepared to consider presenting a joint case with them at any hearing.**

Dated this 19th day of November 2008.



P A Steven
Counsel for Independent Fisheries Limited

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106020

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To: Environment Canterbury
PO Box 345
Christchurch

Name of submitter: INDEPENDENT FISHERIES LIMITED (IFL)

Address for service: C/- Goodman Steven Tavendale Reid
PO Box 442
Christchurch 8140

Attention: Pru Steven

Phone: 03 374 9999
Fax: 03 374 6888

1 This is a further submission in opposition to a submission on:

Variation 4 to Proposed Change No 1 to the Canterbury Regional Policy Statement.

2 The submitter opposes the submission of:

Calco Developments Limited
C/- Haines Planning Consultants Limited
(Attention: A J Scott)
PO Box 90842
Victoria Street West
Auckland 1142

Original Submission No 6

3 The particular parts of the submission opposed are:

The whole of the submission. In particular, IFL oppose the following:

- 3.1 Submission point 6.10 which is to transfer the reallocated growth from site CN2 and CN3 and other growth sites affected by the revised noise contour lines in Map E6 to alternative suitable urban edge locations in the Belfast locality rather than to Hendersons Basin;
- 3.2 IFL also opposes the submission by Calco Developments Limited that supports retention of the 50 dBA contour in the RPS as the boundary for restrictions on urban development.

4 The reasons for this submission in opposition are (including but not limited to):

4.1 IFL opposes the redistribution of growth allocated in notified Change 1 to sites CN2 and CN3 to alternative suitable urban edge locations in the Belfast locality. There is no justification for reallocating growth from the Greenfield sites affected by the revised 50 dBA air noise contour.

4.2 There is certainly no justification taking that growth and allocating it to sites not previously identified as being suited to urban growth in the original Change 1 to the RPS.

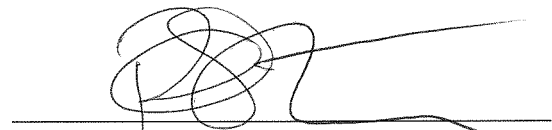
4.3 IFL also opposes the Original Submission to the extent that it supports retention of the 50 dBA for reasons that are explained in its own original submission.

5 Independent Fisheries Limited seeks that the whole of the submission be disallowed.

6 Independent Fisheries Limited wishes to be heard in support of its further submission.

7 If others make a similar submission Independent Fisheries Limited would be prepared to consider presenting a joint case with them at any hearing.

Dated this 19th day of November 2008.



P A Steven

Counsel for Independent Fisheries Limited