

To: Mackenzie District Council

Submission on application concerning resource consent that is subject to public notification

Submission made by electronic means

1. SUBMITTER DETAILS

Name of Submitter: Canterbury Regional Council (CRC)

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2. APPLICATION DETAILS

Application Reference Number: RM240167

Name of Applicant: Godley Peaks Station Limited

Application Site Address: Godley Peaks Station, Godley Peaks Road, Lake Tekapo.

Description of the Proposed Activity: Construction of a homestead (including accessory buildings and use) at Godley Peaks Station, associated earthworks and landscaping.

3. SUBMISSION DETAILS

This is a submission on the application by Godley Peaks Station for a Mackenzie District Council resource consent to construct a homestead (including accessory buildings and use) and associated earthworks and landscaping.

Canterbury Regional Council (**CRC**) opposes the proposed activity.

CRC could not gain an advantage in trade competition through this submission.

Reasons for submission

The reason for this submission is to ensure that the proposed activity is consistent with the provisions of the Canterbury Regional Policy Statement 2013 (**CRPS**) outlined below.

Landscape

- 3.1. Objective 12.2.1 Identification and protection of outstanding natural features and landscapes. This objective requires that outstanding natural features and landscapes within the Canterbury region are identified and their values are specifically recognised and protected from inappropriate subdivision, use, and development.
- 3.2. Policy 12.3.1 Management methods for outstanding natural features and landscapes. This policy ensures management methods in relation to subdivision, use or development, seek to achieve protection of outstanding natural features and landscapes from inappropriate subdivision, use and development.
- 3.3. The site is located in an Outstanding Natural Landscape (**ONL**) and Lakeside Protection Area (**LPA**) as identified in the Mackenzie District Plan (**MDP**). The area is also identified in Appendix 4 of the CRPS as a regionally significant landscape. The landscape visual effects assessment provided by the applicant notes that the effects on the landscape will be moderate reducing to low. However, the landscape assessment commissioned by MDC for the notification decision states the adverse effects would range from high to very high. Consequently, CRC considers the proposal may be inconsistent with Objective 12.2.1 and policy 12.3.1.

Ecosystems and Indigenous Biodiversity

- 3.4. Objective 9.2.1 Halting the decline of Canterbury's ecosystems and indigenous biodiversity seeks that the decline in the quality and quantity of Canterbury's ecosystems and indigenous biodiversity is halted and their life-supporting capacity and mauri safeguarded.
- 3.5. Objective 9.2.3. Protection of significant indigenous vegetation and habitats. This objective seeks that areas of significant indigenous vegetation and significant habitats of indigenous fauna are identified, and their values and ecosystem functions protected.
- 3.6. The ecological report provided by the applicant does not assess ecological significance against the assessment criteria specified in the MDP and CRPS. Species identified in the ecological assessment of the proposed stream crossing are indicative of wetland conditions per the National Policy Statement for Freshwater Management 2020 (**NPS-FM**) delineation protocols. Further ecological assessment is required following the process specified in the delineation protocols. Based on the ecological report provided by the applicant it appears this has not been done. Consequently, CRC considers the proposal may be inconsistent with Objective 9.2.1 and 9.2.3.
- 3.7. Policy 9.3.1. Protecting Significant Natural Areas. This policy sets out the criteria for determining which areas are significant and requires the areas identified are protected to ensure no net loss of indigenous biodiversity or indigenous biodiversity values as a result of land use activities.
- 3.8. The application proposes to upgrade an existing accessway which runs through a Site of Natural Significance (**SONS**) identified in the MDP. Based on the information provided, we are not confident there will not be adverse effects on the SONS. Consequently, CRC considers the proposal may be inconsistent with Policy 9.3.1.

Natural Hazards

- 3.9. Objective 11.2.1 Avoid new subdivision, use and development of land that increases risks associated with natural hazards. This objective seeks that new subdivision, use and development of land which increases the risk of natural hazards to people, property and infrastructure is avoided or, where avoidance is not possible, mitigation measures minimise such risks.
- 3.10. Policy 11.3.1 Avoidance of inappropriate development in high hazard areas. This policy directs that new development in high hazard areas be avoided unless it can be demonstrated that there is no likely loss of life or serious injury, no significant damage or loss, no new or upgraded hazard mitigation is required, and the activity will not exacerbate the hazard.
- 3.11. CRC notes that the site of the proposed activity is located within the Flood Hazard Assessment Overlay as identified in Proposed Plan Change 28 to the Mackenzie District Plan. Section 104 of the Resource Management Act 1991 requires the decision maker to have regard to any relevant provisions of a plan or a proposed plan. CRC considers in light of Plan Change 28 the proposed activity may be inconsistent with Objective 11.2.1 and Policy 11.3.1. In order to demonstrate alignment with these provisions, a flood hazard assessment should be obtained. It is noted that this assessment can be provided by CRC on the request of the applicant.

Consultation with Iwi Authorities

- 3.12. Policy SASM-P2 of the MDP requires that consultation with the relevant Mana Whenua is undertaken where activities have the potential to adversely affect Sites and Areas of Significance to Māori (**SASM**) and their values.
- 3.13. The site of the proposed activity is adjacent to SASM15 Lake Tekapo and SASM23 Te Awa-a-Takatamira/Cass River. The assessment of cultural effects provided by the applicant notes that it is unlikely the proposal would affect any SASM or its values and therefore no consultation is required. CRC considers that the proposal may have the potential to adversely affect the SASM and therefore consultation with Mana Whenua should be undertaken.

Regional Council Responsibilities

- 3.14. CRC considers that onsite wastewater discharges will need to comply with permitted activity standards in the Canterbury Land and Water Regional Plan (**CLWRP**), or a resource consent from CRC will be required.
- 3.15. The application does not specify which consented water take the water supply for the site will come from. Consents may also be required for domestic and stockwater supplies, and for the storage of water associated with firefighting.
- 3.16. Stormwater discharge, including construction-phase stormwater, will need to meet the permitted activity standards in the CLWRP or consents from CRC will be required. Earthworks for the connection to the existing farm water supply do not appear to be included in the Earthworks Plan. These earthworks will also need to adhere to the permitted activity standards relating to construction-phase stormwater or a CRC consent may be required.

- 3.17. There are wetland areas on the site, if earthworks to install a pipeline from the consented supply to the site are to occur in a wetland a consent from CRC will be required. Any wetland restoration activities will also need to meet permitted activity standards in the CLWRP or a resource consent from CRC will be required.
- 3.18. The stream crossing or culvert for the accessway will need to meet permitted activity standards in the CLWRP or a consent from CRC will be required.

Decision sought

- 3.19. CRC requests that an assessment of ecological significance be undertaken using the appropriate assessment criteria, that a flood hazard assessment be carried out, and that consultation with mana whenua be undertaken.
- 3.20. CRC considers that these outstanding matters mean a full assessment of effects has not been undertaken, and therefore requests that the application be declined unless these issues are adequately addressed.
- 3.21. CRC also requests that, should the landscape effects of the proposal be assessed as more than minor, the application be declined.

4. SUBMISSION AT THE HEARING

We do wish to be heard in support of our submission.

5. SIGNATURE

A handwritten signature in cursive script that reads "Amanda Thompson".

Amanda Thompson

Team Leader Planning & Strategy

1 July 2025