

Resource Management Submission Form

Under the Resource Management Act 1991

Submitters Details

Submitters Full Name/Company/Trust:	University of Canterbury, School of Physical and Chemical Sciences
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* Our default method of corresponding with you is by email and phone. Alternatively, if you wish to receive correspondence by post (including any decision) please provide a postal address and tick the relevant box above.

Address For Service (if different from the submitter's details)

Company:	
Contact Name:	
Email address*:	
Postal Address*:	
Tick if postal address is preferred method of correspondence*:	☐
Phone number (Day):	
Phone number (Mobile):	

Details of application being submitted on

Applicant's name:	Godley Peaks Station Ltd
RM reference:	240167
Description of proposed activity:	This submission addresses the proposed development at Godley Peaks Station (RM240167), with specific concern for its potential impact on the capabilities of Ōtehiwai Mt John Observatory, a critical site for astronomical research and public education. The development proposes to erect a homestead and associated ancillary buildings for the station's owner. This includes structural landscaping planting around the proposed buildings, the adoption of a Farm Biodiversity Plan (FBP), upgrade of huts on the property and a contribution towards the Cass River bridge replacement.

My submission

Please indicate whether you support, oppose or are neutral to the application or specific parts of it (Tick):

☐ Support ☐ Oppose ☒ Neutral

My submission is (the particular parts of the application I support or are opposed to are):

The submission addresses mitigation of exterior light towards preservation of the Dark Sky in the Application & Assessment of Environmental Effects (AAEE) document.

Plan Change 22 which sets out the requirements for light mitigation in the Mackenzie District and the values of the Dark Sky Reserve is referred to as District Wide Matters (pages 74, 102) regarding several plans for light mitigation that are included. We submit the proposed lighting plan needs some review with respect to exact levels of light temperature standards to be installed for exterior lighting. These potentially impact astronomical observing which can start as early as 6pm in winter hours.

The Landscape Visual Effects Assessment (LVEA) document does not mention Plan Change 22 / District Wide Matters. In particular the section on Landscape Values (page 13) only considers the perspective of the day time user. However, the night time user is also an important consideration as the Mackenzie Basin is an important national site for astronomical scientific research and astro-tourism. Night time visual effects need to be explicitly included in the context of the Dark Sky Values outlined in Plan Change 22.

For example, night time users should be explicitly considered in the sections on: 'visual catchment and viewing audiences' in items 63 to 67; 'Users of more distant public land' in item 88 which particularly refers to Ōtehiwai Mt John Observatory; 'Conclusions' item 110 to 121

Note also that Viewpoints L and M are taken from Ōtehiwai Mt John Observatory during the day and do not show the impact of expected lighting and associated mitigation during the night.

We note that proposed plantings around the homestead will increase the mitigation of light effects as they become established over time.

The LVEA does not address the impact of lighting effects due to increased vehicle traffic on Godley Peaks Road.

Whilst the current consent is for the homestead and associated buildings, the proposal indicates the potential scope of future developments with a number of lifestyle blocks and dwellings possible. All developments have the potential for significantly increasing night sky glow and the magnitude of reflected light to the detriment of the Dark Sky Reserve and the scientific operations at Ōtehiwai Mt John Observatory. Hence it is important that the current consent is explicit in adhering to Plan Change 22 to ensure future developments are equally explicit.

(Attach separate sheet as required)

The reasons for my submission (the reasons I support or oppose the particular parts of the application above):

The Mackenzie District Plan (Plan Change 22 / District Wide Matters) requires:

- Minimisation of light pollution to protect the natural night sky.
- Use of low-intensity, warm-colour lighting (e.g., 3000K or lower).
- Full shielding of outdoor lighting and use of timers or curfews.

The Mackenzie Basin's dark skies are a globally significant natural and scientific asset. Any development in this sensitive landscape should be held to the highest standards of environmental stewardship. We submit the proposal should demonstrate compliance and be held to the District Plan's vision and the values of the Dark Sky Reserve.

We acknowledge the included lighting and mitigation plans are described with the intent to support the dark sky and while the AAEE addresses these requirements for the most part, LVEA needs to include reference to the dark sky values and night time users.

(Attach separate sheet as required)

My submission would be met by the Council making the following decision (give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought):

We respectfully request that the Council:

1. Require the applicants to update their lighting plan in the AAEE with regard to exact temperature levels of external lighting.
2. Require the applicants to update the LVEA to explicitly consider night time users in the landscape values sections and conclusions with particular reference to the Dark Sky Values in Plan Change 22 / District Wide Matters - Light.
3. Require the applicants to commission a night time lighting impact assessment, e.g. cumulative effects on the Dark Sky Reserve, visual impact of night time lighting as viewed from Ōtehiwāi Mt John Observatory.
4. Require the applicants to provide options for mitigation of light from night time traffic through voluntary agreements regarding headlight dimming and optimising night time travel times.
5. Encourage the applicants to engage with Ōtehiwāi Mt John Observatory stakeholders and University of Canterbury departments (Astronomy, Biology, Geology) regarding potential impacts and mitigation.

(Attach separate sheet as required)

Declarations

Please indicate whether or not you are a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (tick):

☐ I am a trade competitor

☒ I am not a trade competitor

If you are a trade competitor, please indicate whether or not are directly affected by an effect of the subject matter of the submission that

(a) Adversely affects the environment; and

(b) Does not relate to trade competition or the effects of trade competition (tick):

☐ I am directly affected

☐ I am not directly affected

Please indicate whether or not you wish to be heard at the hearing in support of your submission (note you will only be notified of a hearing if you have indicated you wish to be heard) (tick):

☐ I wish to be heard

☒ I do not wish to be heard

If others make a similar submission, I will consider presenting a joint case with them at a hearing (tick):

☒ Yes

☐ No

Please note ALL information provided in this submission will be made publicly available I understand

☒ I understand

Signature of Submitter (or person authorised to sign on behalf of the submitter)*

Date

- *If signing on behalf of a trust or company, please provide additional written evidence that you have signing authority.
- *A signature is not required if you make your submission electronically.



2 July 2025

Signature of Submitter
(or person authorised to sign on behalf of the submitter)*

Date

Note to submitter

If you are making a submission to the Environment Protection Authority, you should use form 16B. The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.