

Your Comment on the Ayrburn Screen Hub

If you wish to make comments on the application, please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fastrack.govt.nz.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	N/A		
First name	Neil		
Last name	Green		
Postal address	[REDACTED]		
	[REDACTED]	Work phone	[REDACTED]
Email (a valid email address enables us to communicate efficiently with you)	[REDACTED]		
2. We will email you draft conditions of consent for your comment			
<input checked="" type="checkbox"/>	I can receive emails and my email address is correct	<input type="checkbox"/>	

Executive summary

1. We strongly oppose this application.

Our position is straightforward:

- The "Trojan Horse":** This proposal appears to be a tactical manoeuvre to bypass the District Plan and secure a high-density accommodation in a rural zone, using a film studio as the vehicle. The Applicant's own financial reporting supports this view. We are confident if the Panel asked other neighbours, who are not defined as 'adjacent' there would be similar concerns about the impacts this Fast Track application will have on the quiet enjoyment of their properties, and the overall amenity values of the area.
- Commercial and Industrial Incompatibility:** An industrial film production facility and high density commercial accommodation is fundamentally incompatible with the rural-residential amenity of Speargrass Flat.

- c) **Flawed Economics:** The economic case is "sketchy" at best. It lacks independent verification and fails to justify why this specific, sensitive location is required for regional film infrastructure.
- d) **Unacceptable Impacts:** The cumulative effect of noise, traffic, landscape, and prolonged construction will severely impact the amenity of the area, and why we live here.

Who we are and why we live here

- 2. We are the owners of [REDACTED]. We purchased this property just over three years ago, moving from an apartment we had in the Butel villas at Millbrook Resort.
- 3. Our property is approximately 8,000m² and is an "adjacent" property to the application site.
- 4. We made a deliberate decision to move to this location. We wanted a 'more rural' aspect and feel than experienced at Millbrook, and deliberately choose the location for its beautiful open landscape, the ability to have a relaxed lifestyle and the amenity values it offered.
- 5. We were aware of the planning history and the clear direction of travel to maintaining the Wakatipu Basin Rural Amenity Zone and that successive Council and Court decisions - culminating in the 2023 Environment Court ruling - have consistently and robustly prohibited intensive development on this land.
- 6. We value the open space, the quiet, and the rural character. This proposal seeks to overturn the very planning framework that gave us the confidence to live in this area.

The applicant's apparent true intentions: The "Trojan Horse"

- 7. The Panel must scrutinise the applicant's motivation. Why build an industrial facility on prime rural-residential land? The answer lies in Winton's own 2025 Annual Report, where the Chairman states:

*"Ayrburn is situated on the **'best part of the most expensive street in New Zealand'** and is a key long-term asset for Winton.*

*"We intend to continue to **maximise the value from the entire masterplan for shareholders.**"*

- 8. Who in their right mind attempts to build an industrial and commercial film studio in "*the best part of the most expensive street*" unless it is a Trojan Horse to allow intensive property development? (We refer to the history and the applications referred to other neighbours' submissions, and note that these other attempts have been firmly dismissed).
- 9. This application uses the Fast-Track process to bypass the Environment Court's explicit decision that intensive residential property development in this area is not appropriate. It is a commercial property play dressed up as regional infrastructure.
- 10. If there was agreement a film studio was a national economic priority (which we very much doubt), then put it in a suitable commercially-zoned area that allows the type of intrusive activity that such a facility requires so it has the best chance of success.

The economic case: why this location?

11. We have read the submission of our neighbour at [REDACTED], and we endorse Paul Dougherty's (Cameron Partners) analysis and critique of the economic case.
12. From a business perspective, the application fails to answer basic questions:
 - a) Why here? If a film studio is a national priority (which we question), why put it in a high amenity rural zone with a large number of noise-sensitive adjacent neighbours where operational constraints (like curfews) will inevitably hamper its success? It belongs in an industrial zone.
 - b) Why the accommodation? The suggestion that 201 units are essential for a film studio contradicts industry norms, where it is understood that a large number of crews operate on daily rates (as per the Industry 'Blue Book') and find their own accommodation. This suggests the accommodation is the primary goal, not a supporting activity.
 - c) What about the risks? Other studios in the region (Silverlight, etc.) have struggled or failed invariable because the numbers didn't stack up. If the Screen Hub fails, the community is left with a high-density commercial accommodation operation in a rural zone—which is likely to be the applicant's "Plan B" all along.
13. The suggestion that having 201 rooms will be an essential part of the film studio to attract productions seems to fly against what we understand is the norm for the film industry – where the majority of people working on the production of a film are paid a daily rate and they prefer to manage their own accommodation and related costs. It appears only a very few, very senior people are offered accommodation.
14. Global film production is shifting geographically, driven by emerging hubs and aggressive incentives. New Zealand is not one of these emerging areas. We note that James Cameron, the internationally renowned director of several highly successful films recently said (14 December 2025 in the NZ Herald) that *"New Zealand has big challenges ahead if the Government doesn't act to help a struggling film industry rebuild and better compete with countries like the UK and Australia with more financially viable rebate schemes..."* *"We have a big problem being competitive here in New Zealand, the way we used to be, and we took a hard hit here during Covid."* If it is difficult for an award winning director like Mr Cameron, how can Winton's economic business case stack up in any measure?
15. We note Winton was fully aware of the District Plan restrictions and protections. It could also use the land that is already zoned for residential/ accommodation purpose and that is available in the Waterfall Park area.
16. Production costs are decreasing thanks to AI and cloud technology, democratising filmmaking. This means different roles are now being delivering across international borders, lowering the traditional demand for having all skills in one place.
17. Key questions for examination include:
 - a) Where is the developed business case and evidence that new films / productions would come into New Zealand if this facility proceeds?
 - b) How can the Panel be assured that this facility would not simply cannibalise existing film studios in New Zealand, or the region, by taking productions off them (and therefore having a negative or at best neutral economic benefit)?
 - c) On the economic case provided, how could there be any confidence that the film studio would be successful?

- d) Why would productions come to this facility when Winton has no expertise or history in this sector?
- e) Where is the proof that large scale accommodation is required, especially when the majority of people working on a production are paid daily rates and prefer to seek lower cost accommodation (if needed)?
- f) How many film productions does Winton have confirmed (on the basis it went ahead). As Paul Dougherty's submission points out, Mrt Gibson's consulting work for Winton appears to be reliant on "God being willing" for it to achieve the business case. Seemingly the business case is based on "build it and they shall come" premise.

Unacceptable effects on amenity

The wrong test

- 18. The "permitted baseline" for this site is a handful (ie 3-4) of rural – residential houses. The noise profile of a 24/7 industrial facility and a 201-unit hotel is massively above this baseline and will permanently alter the character of the area. The same applies to light spill (and we support the submission of our neighbours at 517 Speargrass Flat Road).
- 19. It is ironic that the applicant is happy to rely on the District Plan when it suits them - claiming compliance with its noise limits for example (which we question) - while simultaneously ignoring the District Plan's fundamental zoning rules to justify the development itself.

The intrusive risk is visible

- 20. The applicant's own noise contour maps (the 'heat maps') clearly show the scale of the noise footprint this facility would generate if unmitigated. It paints a picture of a site that is inherently noisy and industrial, wholly at odds with its neighbours.
- 21. The fact that the proposal (when first lodged for consideration under the Fast-track system) required an upgrade of the Speargrass Flat Road intersection to manage the impacts of the increased traffic speaks volumes for the traffic impacts on Speargrass Flat – through induced traffic. The amenity impacts have not been assessed, with the AEE only covering network capacity and intersection performance.

Flawed assessment of noise

- 22. We have little trust in the noise assessment and do not think it provides the neighbourhood any confidence that this facility could be operated in a way that does not significantly (and negatively) impact us. We submit that the proximity of noise sensitive residential uses, which all enjoy high levels of amenity and low ambient noise levels, means that a precautionary approach must be taken to the estimation of noise and the management of noise.



23. As the above image demonstrates, the proposed facility and accommodation units disproportionately change our current landscape into a completely different neighbourhood. The resulting construction and operational noise impacts would be significant.
24. This is not just about the ability of the operation to comply with District Plan levels (which is in doubt), but about the degree of change from the existing environment and compared to a 'credible' development of this land under the agreed Structure Plan in the District Plan.
25. We note that other neighbours have identified material omissions in the Marshall Day report, including:
 - the failure to assess noise from the 201 accommodation units, the extensive carparking areas, the lobby and the gym;
 - the absence of controls on night-time noise disturbance; and
 - the imposition of a 5dBA penalty on noise with special characteristics
26. We share these concerns and support the call for an urgent independent peer review of all aspects of the noise assessment, We believe that it is unreasonable to expect the surrounding community to undertake a noise assessment and also record that this is a core issue that we expect the Council to have fully engaged on when making its comments.
27. To this end, we note that the draft filed with the application contains a list of 'best endeavours', makes no mention of the accommodation elements of the proposal and is further example of the 'fait au compli' appearance of this application).

Construction fatigue

28. The neighbourhood has endured years of construction noise from the Ayrburn precinct, and more recently had several months of very significant earthworks (that the Panel will have observed on its site visit) that appear to be in preparation for the granting of this consent.
29. To approve this proposal and therefore another 36 months of heavy earthworks and construction is intolerable. Construction noise is usually permitted because it is "temporary," but when it spans nearly a decade, it becomes a permanent adverse effect.
30. In addition, the Marshall Day assessment has identified that set construction will be an ongoing part of operations – and argues that this will be acceptable because it is like having someone build a house next door. Not only is this not credible (as people finish their builds) it comes across as an arrogant response, made in the context of Fast-track giving this application an easy pathway.
31. As noted above, these effects must be assessed against the construction of 3-4 residential houses and when this assessment is made – the impacts are very significant.

Cumulative impacts

32. The impacts from the Ayrburn Precinct are already reducing the enjoyment of our property and reducing the amenity values of the area. Combined, the cumulative effects of this proposal on top of the Ayrburn precinct will be significant.
33. We note also that the full impact of the Ayrburn precinct has not yet been experienced, as there are unimplemented consents that Ayrburn holds and these must be taken into account (e.g.; the retirement village and the Hayburn event venue)
34. These combined noise impacts need to be comprehensively modelled so that there is a full assessment of all potential noise sources taking place at the same time. Selectively considering them only benefits the applicant and ignores that we receive noise from Ayrburn as one.

Track record and enforcement

35. We cannot trust that conditions will be adhered to, nor can we trust that this proposal if consented will not intensify in levels of activity, or grow in footprint to other areas of the Structure Plan where development is not allowed.
36. This is based on our experience with the Ayrburn precinct, where in two years of operation, we have already experienced the following intensification of activity, "consent creep" and non-compliance:
 - a. **The Events Consent:** Ayrburn has appealed a decision by QLDC appointed independent commissioners to limit high noise concert events to four (3 days each) per year, and is seeking to increase this to seven (3 days each) as applied for. Ayrburn's appeal is yet another example of Winton's relentless push to intensify activity. beyond what we believe, and what the Commissioners held, is an acceptable imposition on neighbours. For the record, we are accepting of loud events 'once in a while' but believe loud events on seven out of 13 (3 day events) weekends in the summer (which is what Ayrburn's appeal would allow) would be an unreasonable imposition on our

neighbourhood – and is why a number of neighbours are participating in this appeal to ensure that this evidence is before the Court, when it is heard in mid-March next year.

- b. **Operational Non-Compliance:** Despite very clear noise limits past 8pm (40dBA) noise from the precinct is experienced. In the most recent example (22 November 2025) Ayrburn has advised that it was ‘within its consent levels’ (though declined to provide its monitoring information). This is concerning, as if the bass and low level ‘thudding’ from the Bakehouse complies with the 40dBA noise limit -then what will we hear if the activity on the whole of Ayrburn farm intensifies through this proposal?
- c. **Removal of safeguards:** Ayrburn has sought and been granted non-notified variations to existing consents (e.g., RM240244 for the Bakehouse & Billys) to remove critical noise protections like the requirement to have all windows and doors closed between 8pm and 8am and at all times when used for functions where amplified music is being used.

37. Furthermore, the Council’s enforcement system is over stretched and ineffective. Residents are frustrated that there is no easy and cost effective way to ensure compliance, and without Council support, feel an unfair burden is placed on us.

38. Recent examples are:

- a. **The 'Billy's' Opening:** When noise from the opening of 'Billy's' restaurant went late into the night (and well post the 8pm 40dBA control). Council contractors were unable to even identify the correct venue, let alone enforce complex noise limits.
- b. Council staff have advised that their contractors can only enforce ‘**excessive noise**’ for the venues that do not have operational conditions (the Council’s position is that the Barrell Room is the only venue where effective conditions remain) – despite the 40dBA noise limit applying after 8pm.

39. The Panel will therefore understand why we have zero confidence that if complex conditions and noise limits for a 24/7 industrial film facility and associated accommodation were able to be crafted, that they would be consistently met and actively monitored or enforced. A set of conditions is only as good as its operator and the Council enforcement processes that have a firm hand behind them. We have no confidence in neither.

Impacts on landscape

40. The landscape values of the area are well articulated in the Environment Court decision for the site, and the Structure Plan was developed by the Court in response to the extensive landscape and visual amenity assessments before the Court. We submit that the impact of this proposal on those values cannot be dismissed with a massive amount of earthworks, ‘the Spur’ and the so called ‘cocooning’ of the extensive buildings.

The proportionality test

41. Under the Fast-Track Act, the Panel must weigh the adverse impacts against the benefits. In this case, the adverse impacts are certain and significant: the degradation of rural amenity, prolonged construction disruption, and the overturning of the District Plan.

42. The benefits are speculative and "sketchy": based on an untested business case for an industry that is contracting globally.
43. The adverse impacts are disproportionately high compared to the questionable benefits.

Conclusion and relief sought

44. This proposal is an industrial and commercial activity in the wrong location. It is inconsistent with the District Plan and relies on a optimistic economic case that does not demonstrate why this specific site is required or justify the District Plan and impact on neighbours being set aside.
45. We respectfully request that the Panel decline the application.

In the alternative:

46. If the Panel is minded to grant consent (which we strongly oppose) we submit that it can only be on the basis of conditions that ensures Winton "lives or dies" by the Screenhub concept, preventing it from morphing into a commercial accommodation operation and/or a residential development (like the Butel villas concept at Millbrook) - with re-purposed Screenhub buildings.
47. We suggest that stringent conditions are required to:
 - a. **Ensure existing accommodation consents are not 'doubled up'** with the new accommodation proposals as part of the Screenhub Application. Ayrburn already has the consent to build a small hotel and retirement apartments. These should not be 'in addition to' the 201 accommodation units sought.
 - b. **Tie the Accommodation:** The 201 units must be strictly tied to the film studio use. If the studio is not operating, the units cannot be rented to the general public.
 - c. **Require Enforceable and Unequivocal Operational Controls:** Noise conditions must be strict and binary (e.g., hard curfews), rather than being left to a "management plan" which in its current form is filled with hopes and promises. As noted earlier, 'best endeavours' (as described in the application) makes no mention of the accommodation elements of the proposal and is further example of the 'fait au compli' appearance of this application).
 - d. **No Repurposing:** A condition that the large studio buildings cannot be repurposed for other commercial uses or demolished for residential subdivision in the future.

Neil Green and Suzie Bognar: [REDACTED]