

17 December 2025

FTAA-2506-1071

Chair and Members of the Expert Panel  
Environmental Protection Authority  
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Dear Expert Panel,

## Comment from QLDC on Ayrburn Screen Hub (ASH) [FTAA-2508-1093]

### 1. Introduction

- 1.1. In response to a request to comment under s53 of the Fast-track Approvals Act 2024 (FTAA) we provide Queenstown Lakes District Council's (Council or QLDC) written comment for the substantive application for resource consent for the Ayrburn Screen Hub (Application) lodged by Waterfall Park Development Limited (Applicant).
- 1.2. This Memorandum provides the Council's overview comments on the Application and should be read alongside, and is supported by the following technical memoranda attached as appendices:
  - **Appendix 1** – Landscape Peer Review – *Prepared by Bridget Gilbert – Consultant Landscape Architect*
  - **Appendix 2** – Planning Peer Review – *Prepared by Marcus Langman – Planning Consultant*
  - **Appendix 3** – Property & Infrastructure Analysis – *Prepared by Richard Powell (Infrastructure Development Engineering Manager), Property & Infrastructure, QLDC*
  - **Appendix 4** – Development Engineering Technical Memo – *Prepared by Michael*

- **Appendix 5** – Parks & Reserves Report – *Prepared by Dominic Harrison Parks and Reserves Planner), Parks and Reserves, QLDC*
- **Appendix 6** – QLDC’s Recommended Draft Conditions – with QLDC’s changes to the Applicant’s conditions shown in track change, including some explanatory text.

## **2. Summary**

- 2.1. The application involves the development of a comprehensive screen production hub to the southwest of the existing ‘Ayrburn Precinct’, including sound stages, production workshops, offices, film-support buildings, and 201 on-site accommodation units for cast and crew which is also to be utilised as visitor accommodation when not in use for accommodation for film staff. The application also includes associated earthworks, new internal roads, parking areas, stormwater treatment and discharge to Mill Creek, landscaping, and public trail connections.
- 2.2. Council has reviewed the documents lodged with the substantive application and the further information provided by the applicant on 18 November 2025. Discussions with the applicant remain on-going to resolve matters of disagreement.
- 2.3. The key matters for Council relate to:
  - 2.3.1.the effects upon landscape character and visual amenity,
  - 2.3.2.inconsistency with many relevant objectives and policies in the QLDC Proposed District Plan (PDP) and other key strategic documents, including the Queenstown Lakes Spatial Plan, and
  - 2.3.3.lack of capacity in the Council’s potable water scheme to service the proposal.
- 2.4. Peer reviews undertaken for QLDC conclude landscape effects are assessed as moderate to moderate-high, and the proposal is considered inconsistent with the intended rural open character and spatial logic for the Speargrass Flat Landscape Character Unit which forms part of the Wakatipu Basin Rural Amenity Zone (WBRAZ) PDP framework with potential to undermine recently settled planning outcomes. Furthermore the scale and intensity of the proposed development amounts to urban development outside the Urban Growth Boundary and therefore conflict with the PDP’s strategic direction for urban development, as well as the WBRAZ framework.
- 2.5. Other areas of focus for QLDC relate to the suitable provision of potable water, and the certainty and timing of required transport upgrades.
- 2.6. The primary infrastructure constraint is potable water supply. The applicant has relied on outdated modelling used for a separate 2018 consent and the modelling is no longer valid or relevant. There is no capacity in Council’s potable water supply available to service the

proposal. The Council is not yet in a position to confirm the necessary upgrades to the Lake Hayes Scheme, noting that they are not required solely for the Screen Hub proposal. Despite efforts to bring forward the necessary calibration and modelling work, updated modelling will not be available until March 2026. A condition is requested requiring the applicant to fund its proportionate share of any required upgrades. Wastewater capacity is available through the ability to connect to Councils existing wastewater network which runs between Arrowtown and the Shotover Treatment Plant. However, where this development is occurring is outside the Councils wastewater scheme boundaries and therefore a condition is requested that enables Council to negotiate a development contribution. This, along with the requested water condition, is further discussed below. The stormwater design aligns with the existing Ayrburn exemplar system.

2.7. For transport, QLDC considers that proposed monitoring-based triggers for road upgrades create uncertainty and delay mitigation. Council's position is that necessary upgrades to the Arrowtown–Lake Hayes Road and Speargrass Flat Road intersection should be designed and constructed before the development becomes operational.

2.8. Proposed trail connections and improvements are supported, and environmental enhancements from extensive stormwater management contribute positively.

### **3. Response to Information Requested through Minute 5 of the Panel**

3.1. On 27 November 2025 the Expert Panel Requested through Minute 5 for QLDC, as part of its written comments, address issues arising from changes to the application, including status of underlying subdivision consent (Council reference RM240982), and whether sought changes to this consent are within scope of an RMA section 127 variation or require reconsenting.,

3.2. A response to these questions has been outlined within paragraphs 10-29 of Mr. Langman's Report attached as Appendix 2.

### **4. Key Issues**

4.1. The following are the key matters that QLDC has elected to address in this written comment:

**Section 5 – Landscape character, Visual Amenity and consistency with PDP**

**Section 6 – Three water servicing feasibility and funding**

**Section 7 - Transport**

**Section 8 – Cycle Trails and Active Transport**

**Section 9 - Alignment with Key Strategic Documents**

**Section 11 - QLDC Condition recommendations**

### **5. Landscape Character, Visual Amenity and consistency with PDP**

5.1. To assess the proposal, Council has commissioned peer reviews of the Applicant's landscape

and planning assessments. As outlined in section 1 of this report, a landscape peer review prepared by Ms. Bridget Gilbert is attached as Appendix 1 and a planning peer review, including a review of relevant Proposed District Plan (PDP) objectives and policies prepared by Mr. Marcus Langman attached as Appendix 2. Appended to Mr. Langman's evidence is a summary of environment court decisions that relate to the site, previously provided by Mr. Langman and submitted as part of QLDC's s17 comments for referral application for the Ayrburn Screen Hub.

- 5.2. As Ms. Gilbert outlines in her assessment, there are concerns regarding the feasibility of proposed mitigation planting upon the engineered spur landform due to the likely requirement for geogrid reinforcement, which may potentially limit the ability for large tree species to successfully establish. Similarly, the lack of certainty of the proposed retaining feature to the northwestern side of the site also raises questions about the extent of success of planting in this area should certain retaining feature be utilised. Ms. Gilbert confirms that her assessment is based on an assumption that successful establishment of plantings as intended in these areas is achievable, however this question of planting feasibility is a gap in the information that should be filled by the Applicant. The Applicant has been made aware of these concerns and it is understood that information is being gathered to address this matter.
- 5.3. On the assumption that the feasibility of planting can be addressed, both Ms. Gilbert and Mr. Langman consider that the proposed development, by virtue of the scale, character, and extent of the proposed built development, combined with the commercial nature and intensity of the proposed land uses would constitute urban development as defined under the PDP.
- 5.4. As such, the proposed development is contrary to key strategic objective and policies of Chapters 3 (Strategic Direction) and 4 (Urban Environment) of the PDP that provide clear and strong direction that Urban Development should be avoided outside of the urban growth boundary.
- 5.5. Furthermore, Ms. Gilbert considers that the proposed development would result in landscape effects that rate from 'moderate' (which equate to more than minor) to 'moderate-high' (which equate to more than minor but not significant). Ms. Gilbert considers that the proposal represents a very poor fit with the landscape related intentions of Chapters 24 (Wakatipu Basin Rural Amenity Zone) and 27 (Subdivision and Development) for the area, and in particular the deliberate spatial approach to carefully constrain rural living (and other) development in this part of the Wakatipu Basin included in the PDP including through the Ayrburn Structure Plan, and retain a continuous band of more spacious and open, 'undeveloped' land throughout Speargrass Flat.
- 5.6. Relying on the assessment from Ms. Gilbert, Mr. Langman concludes that the loss of rural openness, erosion of rural character, large-scale landform modification, and inconsistency with the Ayrburn Structure Plan underpin the finding that the proposal conflicts with the objectives and policies of Chapters 6, 24 and 27 of the PDP. These chapters collectively require the maintenance of rural landscape character, avoidance of inappropriate development in sensitive landscapes, protection of natural landforms, management of cumulative effects, and adherence to the spatial logic and open-space areas established by Structure Plans.

5.7. As such, relying on the expert evidence of Ms. Gilbert and Mr. Langman, it is considered that the proposed development would result in a level of landscape effects that would be contrary to the landscape outcomes sought by the PDP within the WBRAZ and outside of the urban growth boundary. As such the development has the potential to contradict the objectives and policies of PDP, including its strategic approach to growth management and the landscape protection outcomes of this part of the Wakatipu Basin which have only recently been confirmed through Environment Court decisions.

## **6. Three water servicing feasibility and funding**

6.1. Council has concerns regarding the Application's approach to servicing for the proposal as outlined in a technical memo prepared by Council's Property and Infrastructure Engineer Mr. Richard Powell (**Appendix 3**). These concerns are summarised below.

### **6.2. Potable Water**

6.2.1. To service the proposed development with potable water, the applicant proposes to connect to Council's existing reticulated water supply (Lakes Hayes Scheme) that currently services the nearby 'Ayrburn Precinct' to the north and the wider Lake Hayes Area south of the site. While the Ayrburn Precinct is located within the Council's scheme boundaries, the proposed Screen Hub is not.

6.2.2. The Applicant has relied upon water modelling undertaken in 2018 used to support previous resource consents to demonstrate that sufficient capacity exists within the Council's network. This modelling is outdated and there is now insufficient capacity to service the proposed development and therefore upgrades are required before the Applicant will be able to connect to Council's reticulated water supply.

6.2.3. The upgrades to Council's reticulated water scheme that are likely required to enable sufficient capacity for the proposed development include:

- Upgrades at the source to enable additional water
- Upgrades to increase rising main size
- Additional reservoir storage
- Upgraded pipeline along Arrowtown-Lake Hayes Road

6.2.4. Whilst Council is aware of the constraints within the Lake Hayes Scheme, recalibration of the water modelling is required to confirm the extent of upgrades needed.

6.2.5. This recalibration has been commissioned, however cannot be obtained earlier than March 2026. QLDC has consulted with the Applicant on this matter including on a suitable condition of consent to ensure the required upgrades are undertaken and funded by the applicant to enable sufficient water supply for the proposed development, without additional cost being incurred by the ratepayer for the required upgrade and additional

demand generated by the proposal. This condition is contained within **Appendix 6**.

6.2.6. However, the subject site is located outside of QLDC's water scheme boundaries and contributing areas as set by QLDC's Development Contribution Policy. As such, development contributions cannot be automatically collected for this development to appropriately account for the additional demand placed on Council water infrastructure. This leaves an unacceptable risk of the cost of this demand being placed on the ratepayer. To avoid this, Council request that a bespoke development contribution is negotiated under a development agreement. Council is of the view that this should be secured by a volunteered condition of consent (or the Panel imposes it if it considers it is able to). Subject to this condition being offered and imposed (should the consent be granted), Council is satisfied with the proposed wastewater servicing.

### 6.3. **Wastewater**

6.3.1. The applicant proposes to dispose of wastewater via a private internal network that connects to QLDC's wastewater reticulation, conveyed to and treated at the Shotover Wastewater Treatment Plant.

6.3.2. As outlined in section 2.2 of **Appendix 3**, Mr. Powell confirms that as a result of current upgrades at the Shotover Wastewater Treatment Plant, which are designed to provide capacity for growth across the Wakatipu Basin through to 2048, sufficient capacity exists within the council's wastewater scheme to accept expected flows from the proposed development, subject to suitable conditions of detailed design and requiring costs of connecting to QLDC's network to be borne by the developer.

6.3.3. The development is located outside of QLDC's wastewater scheme boundaries and contributing areas as set by QLDC's Development Contribution Policy. As such, development contributions cannot be automatically collected for this development to appropriately account for the additional demand placed on Council wastewater infrastructure. As the development is going to connect to Council's existing wastewater network Council considers it is appropriate that a development contribution is payable otherwise there is an unacceptable risk of the cost of this demand being placed on the ratepayer. Similar to water, Council requests that a bespoke development contribution is negotiated under a development agreement. Council is of the view that this should be secured by a volunteered condition of consent (or the Panel imposes it if it considers it is able to). Subject to this condition being offered and imposed (should the consent be granted), Council is satisfied with the proposed wastewater servicing.

### 6.4. **Stormwater**

6.4.1. The applicant proposes to dispose of stormwater to Mill Creek via a range of raingardens, pod wetlands and tertiary infiltration ponds. The proposed stormwater approach appears to be a continuation of the existing Ayrburn precinct stormwater system, which is considered an exemplar for managing and treating stormwater to Lake Hayes, which

Council supports.

6.4.2. As outlined in **Appendix 3** the stormwater system appears feasible and capable of meeting the QLDC Land Development and Subdivision Code of Practice 2025 (CoP) requirements and is supported by QLDC, subject to the applicant's proposed condition (15(d)), which requires an independent peer review of the stormwater system at detailed design stage, with all costs borne by the consent holder.

## **7. Transport**

- 7.1. The applicant has provided a transport assessment prepared by Carriageway Consulting which identifies, when considering the existing environment of unimplemented resource consents, that upgrades to Arrowtown-Lake Hayes Road are necessary to cater for additional traffic flows from the proposed development and the unimplemented resource consents.
- 7.2. The applicant proposes a series of conditions requiring monitoring to determine when traffic flows reach a point that necessitate upgrades to the Arrowtown-Lake Hayes Road/Speargrass Flat Road intersection. At which point detailed design of these upgrades is to be provided to Council for review.
- 7.3. As outlined by Mr. Wardill within **Appendix 4**, these conditions create unnecessary complexity which is challenging to monitor and enforce, lack certainty, delays necessary infrastructure and could expose the public to safety risks. The unimplemented consents could also be implemented at any time. It is council's view that the detailed design and construction of upgrades necessitated by this development should be completed prior to the operation of the development to mitigate the anticipated traffic effects. This position is reflected in QLDC's requested conditions outlined in **Appendix 6**.

## **8. Cycle Trails and Active Travel**

- 8.1. The application proposes to increase cycling connection to and from the site by establishing a public easement connection to the Mill Creek esplanade strip to the south of the site (referred to as Trail C within the application) to enable the connection to a future trail, the creation of a public easement over an existing trail to the south (Trail B) to formalise this existing connection, and finally the relocation of a steep part of the existing Countryside Trail (Trail C), to create a gentler, safer grade for this section of trail.
- 8.2. Council's Parks and Reserves Team have reviewed the application and have provided a technical memo attached as **Appendix 5**. In summary, the proposed trail connections and formalisations are considered a positive outcome and associated recommended conditions of consent have been provided by the applicant to ensure the trails are constructed to the appropriate standard.

## **9. Alignment with Key Strategic Documents**

9.1. In addition to the District Plan, QLDC have developed a number of higher order strategic documents under the local Government Act 2002 that provide direction for how development should be carried out within this district. These documents include the Queenstown Lakes Spatial Plan, the Economic Diversity Plan and the Draft Blue Green Network Plan. These documents are a relevant “other matter” under RMA s104(1)(c) and FTAA Schedule 5 Clause 17(1)(b)).

## 9.2. Queenstown Lakes Spatial Plan

9.2.1. The Spatial Plan outlines five key outcomes, including Outcome 1: *Consolidated Growth and More Housing Choices* Outcome 5: *a diverse economy where everyone can thrive*.

9.2.2. Strategy 1 of the Spatial Plan seeks to increase density in appropriate locations to enable growth whilst preserving the natural landscape and rural character of the Queenstown Lakes that are highly valued by the community, Kāi Tahu and visitors. To enable this, the Spatial Plan identifies priority areas and future urban areas where development can be appropriately consolidated. The proposed development is not located within these areas and as outlined by Ms. Gilbert, may result in adverse effects upon the landscape and rural character. As such Council considers this is inconsistent with the desired outcome of the Spatial Plan which seeks to protect landscape and rural character.

9.2.3. The Spatial Plan acknowledges that Queenstown Lakes is an iconic destination and a key part of New Zealand’s tourism economy. However, the region’s heavy reliance on tourism has made it vulnerable to global economic shocks. Recognising this, the Spatial Plan prioritises economic diversification, with a particular focus on high-value sectors such as the film industry, which has the potential to create quality jobs and strengthen the local economy. The proposal may support this diversification.

9.2.4. The improvements to Mill Creek will enhance ecological protection and contribute to better water quality in Lake Hayes. These environmental benefits will, in turn, support the local economy by ensuring an exceptional visitor experience while safeguarding the health and well-being of the community. Furthermore, the proposed trail connection will increase public access and connectivity. As such, the proposed development results in positive enhancement of Blue Green Network, sought by the Spatial Plan.

9.2.5. For the reasons stated above, whilst the proposal supports goals for economic diversification, the development is not located within a strategically prioritised development area, suitable for consolidating growth. As such it is not considered to be consistent with outcomes of the Queenstown Lakes Spatial Plan.

## 9.3. The Economic Diversity Plan

9.3.1. The Economic Diversification Plan (EDP), endorsed by 18 local organisations including QLDC, aims to create a more diverse range of career and business opportunities across the Queenstown Lakes district. ‘Film and Creative Industries’ is identified as one of the



priority sectors that leverage the natural advantages the district has. There is already a strong local film industry but to grow further, the plan identifies the need to 'promote and grow the capabilities of the local film industry, including workforce and infrastructure development projects.' It is considered that the dedicated screen hub for the district would be a positive step towards achieving these goals.

## **10. QLDC Condition requests**

10.1. A full set of requested changes to the applicant's proposed draft conditions is included at Appendix 6 of this report with rational for the sought changes included. The key requested changes to these conditions involve:

- That the required upgrades to water infrastructure are undertaken ahead of commencement of the activity.
- That the required upgrades to Lake Hayes-Arrowtown Road/Speargrass Flat intersection are designed and constructed ahead of the operation of the activity.
- Private developer agreements are entered into with Council to facilitate the negotiation of required development contributions to account of the additional demand placed on Council owned water and wastewater infrastructure.

These key requested changes have been communicated with applicant, and it is Council's understanding that the Applicant is broadly in agreement with these changes.

## **11. Conclusion**

11.1. QLDC has reviewed the Ayrburn Screen Hub application and the further information provided, with input from specialist landscape, planning, infrastructure, transport, and parks staff. The key matters identified in this comment relate to landscape and visual effects, the proposal's relationship to the strategic planning framework, potable water servicing and development contributions for both this and wastewater, and the timing and certainty of required transport upgrades. Other components of the proposal, including stormwater management, and active travel connections, are generally workable subject to appropriate conditions.

11.2. Technical assessments note that further information is required from the applicant on matters such as the feasibility of proposed mitigation planting.

11.3. QLDC has also provided requested changes to conditions in **Appendix 6** to address servicing, transport, and implementation requirements. These technical reviews and requested conditions are provided to assist the Expert Panel in its consideration of the application under the Fast-track Approvals Act 2024.



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