

1. Contact Details	
Please ensure that you have authority to comment on the application on behalf of those named on this form.	
First & Last names	Graham Smith & Catherine Taylor
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2. We will email you draft conditions of consent for your comment
We can receive emails and our email address is correct

G Smith & C Taylor
[REDACTED]

16 December 2025

Submission in opposition to the Ayrburn Screen Hub Application (FTAA-2508-1093)

Introduction

Thank you for the opportunity to provide a submission to the panel regarding the Ayrburn Screen Hub.

We are the owners of [REDACTED] a property that sits immediately beside the site of the proposed Ayrburn Screen Hub. From our calculation, we are approximately 300m from the Screenhub/backlot facility and 200m from the nearest of the accommodation buildings and associated parking (appendix 1).

We have owned our property since 2004 and lived here since building our house in 2017. We value the rural character, peace, and sense of separation from intensive commercial activity and urbanisation that define other parts of the Wakatipu Basin.

We strongly oppose the Fast Track approval of this proposal.

Our objection relates primarily to the loss of rural amenity that would result from this proposal. In particular, the adverse effects generated by this facility such as:

- Operating Noise
- Light pollution
- Increased Traffic flows
- Cumulative effects from other precinct activity (such as concerts)
- Construction

Secondarily, we ask that the economic justification presented by the applicant, receives independent scrutiny before it is relied upon by the panel. The key points being:

- Lack of independent critique of assumptions
- Inclusion of accommodation benefits
- Absence of incremental benefits or the net benefit (after economic costs)

Substantive Submission

A: Loss of rural amenity and effects on our property

1. The environment of Speargrass Flat Road is one of the few parts of the district where rural character remains largely intact. Properties are spaced generously, activity levels are low, and the evenings and nights are particularly quiet. These qualities are not minor aspects of living here; they are the very reason many of us chose to live in this part of Queenstown. They are also recognised and protected in the District Plan.
2. The development proposed by Waterfall Park Developments Ltd is, in our view, fundamentally incongruous with that environment. The level of activity described in the application—film production, workshops, significant vehicle movements, deliveries, night-time operations, and a large accommodation footprint—collectively represents an intensity of use that would permanently alter the rural character of this area. Although the application and its supporting documents speak of careful design and landscaping, these do not change the essential nature of the activity. This is an industrial-scale operation accompanied by a sizable commercial accommodation venture, both of which sit uneasily in a quiet rural valley and wildly out of step with what the District Plan, carefully constructed by the Council, the community and the Court, has said is appropriate for this area.
3. Our submission is that the panel must therefore assess this proposal against the level of development the Environment Court has said is suitable for this site, and the effects that we could credibly expect from that level of development (ie 3-4 rural-residential house sites). We also submit that that ‘zone standards’ (or absence of them) are of reduced relevance as they have been set with the permitted uses in mind and do not cover effects from activities that the zone does not contemplate (eg lighting).

In this context, we set out the following concerns:

Noise

4. The applicant’s own reports acknowledge that a wide range of operational sounds will occur across the day and, potentially, into the night. These include equipment associated with filming (pyrotechnics, wind and rain machines, combustion engines, a director’s PA), vehicle movements, deliveries, workshops, doors, forklifts, and all the activity associated with operating a 24/7 accommodation business and associated supporting commercial activities (which for context, is 4 times the size of the Millbrook ‘hotel’ business that operates from the Butel villas).
5. We ask that the panel recognise that few (if any) of these sounds would arise from the permitted level of development on this site and that consequently ‘coming under the target’ of the District plan noise levels in the receiving environment (in our case, the Wakatipu Basin Lifestyle Precinct) is not the correct test.
6. The noise contour maps attached to the Marshall Day report show various scenarios – which show the diversity of noise sources and variables, and that the ambient noise levels of the site will change. The worst case scenario (albeit not what the applicant is proposing) illustrates why such facilities are located on land that is appropriately zoned and where they can operate unencumbered by the controls required to prevent impacts on sensitive adjacent receiving environments.

7. The draft conditions of consent do little to address these issues, but instead relies on a proposed Operational Noise Management Plan (ONMP) that sets out a number of behavioural measures intended to limit disturbance. However these rely heavily on operator judgement and ongoing compliance rather than enforceable physical controls. In our experience, behavioural conditions are extremely difficult to monitor and even harder to enforce, particularly in a complex operation involving multiple productions and staff working variable hours. Other neighbours will be covering this specific point in their submissions, and I echo the frustration arising from the Ayrburn entertainment precinct and the lack of confidence in compliance given the combination of the applicant and this Council.
8. Because the ambient sound levels in this valley are very low, even small disturbances at night are likely to be noticeable. The draft ONMP contemplates the possibility of night-time activity, and while it uses cautious language about minimising this “as far as practicable,” it does not prohibit it.
9. The reality of film production is that schedules change, deadlines tighten, and shoots occur when conditions demand and commercial imperatives will over-ride any concern for adjacent neighbours and compliance with a management plan that experience shows, the Council does not have resource to monitor and enforce.
10. In reality, these types of conditions are only enforced when residents complain (which the ONMP contemplates), meaning the burden shifts to neighbours to monitor noise, keep records, and escalate issues. This is not a fair or reasonable expectation for those of us living adjacent to a 24/7 industrial activity. The risk of ongoing disturbance is high, and the enforcement mechanism offers little real protection for rural residential amenity.
11. If the applicant was serious about mitigating noise and avoiding impacts on its neighbours, it would propose strict conditions on hours of operation on all Screenhub operations (eg Monday-Friday 8am -6pm), along with further overall site controls such as an L_{max} (to control night-time disturbance noise) and a lower averaging period for all other noise – ie $Leq(5min)$ - such as has been imposed on the event consent (RMA240257).
12. Further, it would propose continuous and real time monitoring, which is aligned with the monitoring for the Ayrburn entertainment precinct (required as a condition of consent for events under RMA240257 and we are advised, soon to be installed for precinct operations). This is critical as neighbours will experience the impacts of the Screenhub, the accommodation and the Ayrburn entertainment precinct as a ‘package’ and the conditions of consent need to reflect this – and not place neighbours (or the Council) in the position of having to determine the source of noise and non-compliance.
13. As a final point, we reiterate the request made by other neighbours that the panel require an independent peer review the noise assessment filed by the applicant to obtain confidence in the modelled and predicted noise from all operations proposed on the site. If it is correct that the noise from all aspects of the accommodation have not been fully modelled as has been raised, or the New Zealand Standard for noise has not been correctly applied (which we understand requires a 5dB A penalty for noise with specific characteristics) this calls into question the reliability and veracity of the applicant’s assessment overall and also the adequacy of the compliance check by the EPA.

Light Pollution

14. Another concern we have relates to the lighting effects of the proposal and the impact this will have on the rural night-time environment. Speargrass Flat Road and the wider Wakatipu Basin are characterised by naturally dark evenings, minimal ambient lighting, and a noticeably quiet, low-light rural atmosphere. This is a significant part of the amenity that residents enjoy. The night sky is clear, and the absence of urban light spill is an important feature of the landscape.
15. The application materials state that exterior lighting will comply with the QLDC Southern Light Strategy and that lighting will be designed to avoid spill beyond the site boundary. These references are positive, but they do not provide the level of protection that neighbouring residents reasonably require. The District Plan provisions currently published and publicly accessible do not contain an explicit rural-zone glare rule equivalent to the detailed light-spill and downward-shielding requirements applied to town or business zones through the recent glare variation. As a result (and perhaps for the reason identified above) the rural environment does not benefit from a clearly defined, enforceable lighting standard beyond general amenity expectations and the consent conditions proposed by the applicant.
16. This creates a material risk for residents. The scale of the development—a film studio complex operating long hours, a large accommodation building, extensive parking areas, internal roads, security lighting, and servicing areas—means there will inevitably be substantial lighting across the site. Even lighting that complies with a boundary “no spill” condition can still create visible glow, halo effects, reflections, and sky-glow in a rural context, particularly during winter months or under cloud cover. Because ambient lighting in the valley is so low, even modest night-time illumination can be highly noticeable.
17. The lighting needs of the film hub and accommodation will also be continuous and variable. Staff and guests may arrive and depart during early mornings and late evenings; production schedules can demand work at irregular hours, including 24/7; and safety and security lighting will remain on throughout the night. This is fundamentally different from the low-intensity, short-duration lighting typically associated with activity allowed in this zone, and that would be emitted by 3-4 residential properties. Once installed, lighting effects are persistent, and unlike noise, they cannot be “switched off” by voluntary behaviour without compromising operational requirements.
18. The absence of a specific rural glare standard in the publicly available District Plan documents means that the protection of rural night-sky values will rely heavily on the consent conditions the Panel chooses to impose, rather than on clear baseline rules. This is concerning given the scale of the proposal and the potential for lighting to permanently change the character of the valley after dark. Without robust, enforceable controls—such as fully shielded downward lighting, strict light-spill limits, and caps on operational hours—the rural darkness that currently defines Speargrass Flat Road will be significantly eroded.
19. For a property like ours, where rural quietness and natural darkness are central to the enjoyment of the home, the lighting associated with this project represents a substantial and lasting loss of amenity.

Traffic effects

20. Speargrass Flat Road is a local road. The proposal will place large numbers of workers, service providers, delivery vehicles, and guests onto the road each day. The accommodation alone will generate substantial vehicle movements, and production activity will add further pressure. The likely increase in early-morning and late-evening traffic will alter the character of Speargrass Flat Road- _which has not yet experienced the impact of the unimplemented consents on other parts of the applicants land– namely the hotel OR retirement complex and the Haybarn wedding venue for 180 guests (and there may be more that we are not aware of).
21. This will impact on our local amenity. We have noticed the increased traffic since moving into our house (confirmed by paragraph 4.1.2 of the traffic assessment which shows that growth in traffic on Speargrass Flat Road being 33.3% from 2017 to 2023). We expect that there will have been further growth at the close of 2025, that in part will be attributed to the Ayrburn entertainment precinct.
22. While we accept that increased traffic will arise for multiple reasons, it is clear that this proposal will introduce more traffic than we currently experience and we are surprised that the application has made no attempt to assess the amenity impact of this, limiting its comments to operational delays, intersection safety, and network capacity.
23. Our submission is that the effects of this proposal, as a significant traffic generator, is compared to the impact of vehicle movements associated with 3-4 residential properties.

Cumulative Precinct Effects

24. The Ayrburn precinct already hosts a range of events, hospitality activities, concerts, and commercial traffic, all of which place pressure on the area. The cumulative effect of adding a large industrial and accommodation complex to this existing load has not been adequately assessed in the application. For residents, these effects are not experienced in isolation—they accumulate and erode rural amenity over time.

Construction Effect

25. A three-year construction period involving heavy machinery, earthworks, truck movements, and intensive on-site activity will create prolonged disturbance. For those of us living immediately adjacent to the site, this would represent years of daily noise, vibration, and disruption to our routines and enjoyment of our properties.

Concluding comments on effects

26. Taken together, these effects represent a profound and lasting change to the character of the area. For these reasons, our primary submission is that this is not an appropriate activity for a rural amenity zone, and that the measures proposed to mitigate the effects do not, in practice, protect nearby residents from significant and ongoing impacts.

B: Concerns with the Economic Justification

28. While amenity concerns form the core of our submission, we also wish to raise several points about the economic rationale presented by the applicant.
29. Having reviewed the information provided and we are concerned that the economic case is not sufficiently robust to justify the scale and location of this development. For clarity, we do not present these concerns as expert evidence. However for context, note the over 30 years senior leadership experience in strategic planning and business development.

Lack of Independent Analysis

30. The economic case is framed as the key justification for why such an intensive activity should be approved through the Fast-Track process. In reviewing the material, we were surprised by how heavily the economic analysis depends on information provided by the applicant itself and by a consultant engaged specifically for this proposal.
31. There is no independent demand analysis, no market testing of whether the proposed studio facilities are required at the scale suggested, and no assessment or sensitivity analysis of the likelihood that productions of the type assumed will occur. The Gibson report provides helpful insight into industry practice, but it does not offer evidence of committed demand or a reliable forecast of usage. Much of the economic model appears to rest on hypothetical production volumes rather than confirmed activity.
32. This is further challenged given industry players just over a year ago said in relation to the Silverlight Studios proposal that Wanaka does not have the industry to support the studio.

Conflation of Accommodation Benefits

33. We are also concerned that the economic analysis combines two very different activities: a film studio and a large accommodation development. When the applicant's own figures are examined, it becomes clear that the vast majority of the claimed economic benefit—approximately ninety per cent—comes from the assumed studio activity. The accommodation contributes fewer than seven per cent of the benefits, yet it is responsible for a substantial share of the local effects including traffic, noise, built form, and loss of rural character.
34. In our view, it is inappropriate to treat accommodation-related economic activity as part of a Fast-Track benefit case for a screen hub. Accommodation is a separate commercial activity that should be considered on its own merits under a normal consenting process, not bundled with the screen hub to inflate the perceived benefits.

Incremental and Net Benefits are not assessed

35. The economic analysis does not clarify whether the benefits are genuinely additional to what the region would receive without this development. Queenstown already attracts substantial film and television production, and the region already has considerable accommodation capacity. If productions would have filmed here anyway, or if accommodation would simply shift from existing providers to this site, then the benefit to the region is less.

36. The economic case also seems to represent gross benefits rather than net benefits once the costs are taken into account. The modelling does not appear to include the economic costs of the proposal—such as the loss of rural amenity, increased infrastructure pressure, waste and environmental effects, disruption during the lengthy construction period, and the displacement of visitor spend from existing hotels and hospitality venues. A comprehensive assessment should quantify both benefits and costs before any conclusion could be drawn about the project's overall contribution to regional or national wellbeing.

Benefit Threshold

37. It is not clear whether the benefits suggested meet the threshold required under the Fast-Track Approvals Act, which requires that a project deliver “significant regional or national benefits.” The material provided does not explain how the scale of the benefits compares with the size of the regional economy or whether it meets any established benchmark for significance.
38. Given that the underlying assumptions are untested and the majority of benefits stem from studio activities that may or may not materialise, it would be appropriate for the Panel to seek an independent review of the economic case before placing weight on it.

Conclusion

39. We are strongly opposed to the Ayrburn Screen Hub because of the significant and lasting impact it will have on the rural character and amenity on our property, the surrounding environment and how we enjoy it.
40. The operational activity, the large accommodation component, the construction programme, and the cumulative effects with the wider Ayrburn precinct all point toward a development that is incompatible with the setting. We do not think that these effects can be controlled through conditions.
41. Also, we believe the economic case presented is not independently validated and does not, in its current form, provide a reliable basis for a Fast-Track decision. We would hope the Panel will commission an independent, peer-reviewed economic assessment before relying on the claimed benefits in making its decision.
42. For these reasons, we request that the application be declined.

- Property Location & Proximity to Screen Hub and Accommodation

