



10 November 2020

Silverlight Studios Limited

C/- Scott Edgar

Edgar Planning Limited

1 Kamahi Street

Wanaka 9305

Attention: Scott Edgar

By email: [scott@edgarplanning.co.nz](mailto:scott@edgarplanning.co.nz)

Dear Scott,

**RE: Proposal for referral to establish a film studio, film school and film park**

The Queenstown Airport Corporation (“**QAC**”) understands that Silverlight Studios Limited have applied to the Minister for the Environment for a proposal to establish a film studio, film school and film park (“**the proposal**”) to be referred to an expert consenting panel pursuant to section 20 of the COVID-19 Recovery (Fast-track) Consenting Act 2020 (“**Recovery Act**”).

The site of the proposal (707 Wanaka – Luggate Highway, Wanaka) is located in close proximity Wanaka Airport which QAC manages and holds a long-term lease over. QAC also owns approximately 149.5 hectares of land directly adjoining the airport and near the site of the proposal.

QAC is supportive in principle of this application and acknowledges the benefit that would result from the establishment of such a facility in this region. There are, however, some issues that we would like to raise and potentially resolve with you through ongoing dialogue.

The information contained in the referral application is high level and conceptual, and as such, there remains some uncertainty around the nature of the proposal and considerable uncertainty around its potential effects. While it is understood that a detailed assessment of effects is not required as part of the referral application, QAC’s concerns centre on the potential for the proposal to adversely impact on the safe operation and use of Wanaka Airport as well as the potential effects of the proposal on QAC’s surrounding landholdings.

**Aircraft Noise and Reverse Sensitivity**

Reverse sensitivity effects have the potential to significantly constrain airport operations. While the majority of the proposal is unlikely to comprise activities sensitive to aircraft noise (“**ASAN**”), QAC is of the view that the film school component of the proposal comprises ASAN, as defined in the Operative and Proposed Queenstown Lakes District Plan. While it is understood the intention is to locate this activity outside of the Wanaka Airport Outer Control Boundary (“**OCB**”), aircraft noise and its associated effects do not stop at the OCB. QAC is therefore concerned that locating an ASAN in close proximity to the OCB may constrain future development of Wanaka Airport unless appropriate measures are employed to manage aircraft noise effects.

Similarly, the referral application makes assurances that the filming industry is accustomed to operating in close proximity to airports. It is conceivable however, that frequent scheduled and unscheduled aircraft movements might frustrate some filming activities and therefore create a reverse sensitivity issue. On this basis, QAC is interested in the specific measures to be employed onsite to ensure filming operations are not unduly frustrated by aircraft movements.

### **Operational Matters**

QAC has identified several aspects of the proposal that may give rise to operational concerns. While it is acknowledged that some of these effects can likely be appropriately managed, the conceptual nature of the referral application does not provide sufficient detail or confidence that the effects will be appropriately managed. QAC therefore requests that the following issues be discussed and resolved with QAC prior to any resource consent application being lodged with the EPA (assuming the referral is successful):

1. The potential use of set lighting (particularly during night shoots) and any use of up-lighting to accentuate historic style buildings.

Poorly designed or located lighting can create confusion and/or glare for pilots on arrival or departure which poses a potential safety risk. QAC is therefore concerned about the potential use of lighting as part of the proposal.

2. Effects of earthworks including bulk earthworks required to complete construction of the artificial lake.

The potential for dust nuisance is of concern to QAC, given the proximity of Wanaka Airport to the subject site. Airborne dust that results from earthworks being undertaken in close proximity to flightpaths can unexpectedly obscure the vision of pilots and can damage aircraft engines, therefore posing safety risks.

Additionally, poorly managed earthworks can also result in standing pools of water, which have the potential to attract additional bird life to the area due to the enhanced habitat and increased food sources. An increased presence of birdlife in the area may represent a potential risk to overflying aircraft, and consequently to operations at Wanaka Airport.

3. Use and maintenance of the artificial lake as a potential attractant to birds.

As outlined above, any increased presence of birdlife in the area may represent a potential risk to overflying aircraft, and consequently to operations at Wanaka Airport. QAC is concerned that the artificial lake and surrounding vegetation will potentially enhance bird habitat and encourage the congregation of birds below, or in close proximity to, the centreline of the approach and take-off slopes for Wanaka Airport.

4. Potential protrusions of the Obstacle Limitation Surface including construction methodologies for the proposed buildings up to 16m high.

The airspace above the site is subject to the Airport Approach and Land Use Controls Designation (D.65) administered by Queenstown Lakes District Council (“QLDC”) which forms part of the Obstacle Limitation Surface (“OLS”) at Wanaka Airport. The purpose of the OLS is to prevent objects or structures from encroaching into areas that are critical to the safety of aircraft approaching or departing the airport.

The height of the OLS at the eastern most boundary of the subject site is approximately 23m above aerodrome datum. While it is understood that any craneage used for filming would be less than 20m in height and unlikely to penetrate the OLS, it is not clear if any other activities carried out as part of the proposal would result in potential penetration of the OLS, for example, the use of ballistics in filming. Likewise, the application for referral did not discuss the construction methodology proposed to establish the proposed buildings which are understood to be up to 16 m high.

If any activities, including construction, are likely to penetrate the OLS, QLDC's written approval will be required pursuant to section 176 of the Resource Management Act 1991 and it is expected that such approval would require prior consultation with QAC. It is acknowledged that this is separate to the consenting process, however, if this approval is required and is not obtained, Silverlight Studios Limited may not be able to give effect to any resource consent for the proposal.

### **Summary**

As set out above, whilst supportive in principle of the proposal, QAC does have a number of concerns with the proposal to establish a film studio, film school and film park in close proximity to Wanaka Airport. It would be our expectation that these matters be given full consideration in any future resource consent application. We look forward with working with you as you consider the matters raised further.

For completeness, we also note that the concerns outlined in this letter are not exhaustive. There may be other activities that give rise to reverse sensitivity or operational concerns that are not articulated in the high level / conceptual referral application.

Yours sincerely,



**Rachel Tregidga**  
**General Manager - Property and Planning**

cc

*Ethan Glover, Mitchell Daysh Limited, ethan.glover@mitchelldaysh.co.nz*