

SUMMARY STATEMENT OF CHRISTINE MCMILLAN ON BEHALF OF STEWART FAMILY ASSETS LIMITED

Summary of Evidence

Introduction and Scope

1. My name is Christine Elizabeth McMillan. I am a Planner employed by Bonisch Consultants, a consultancy firm specialising in land development.
2. My evidence addresses the implications of the proposed designation for Stewart Family Assets Limited (**SFAL**) land within the Industrial 4 (Awarua) Zone, including the proposed Horizon Mask and Electromagnetic Interference (**EMI**) restrictions. It also responds to the Section 42A Report and the evidence presented on behalf of SpaceOps.

SFAL Site and Industrial 4 Zone

3. The SFAL land comprises approximately 493 hectares within the Industrial 4 (Awarua) Zone, which was established to provide for large-scale industrial development and renewable energy generation. The Site is currently subject to a resource consent application for seven wind turbines.
4. The planning framework anticipates heavy industrial activities and renewable energy infrastructure, including buildings and structures that may exceed typical building heights where operationally required. IND-P2 seeks to minimise restrictions on industrial activities located outside built up urban areas. Objective IND4Z-O1 seeks to ensure sufficient land is available or future development of large industrial warehousing and large scale service activities which are more appropriately located outside the urban area (IND4Z-O1). IND4Z-P1 requires the establishment of the Zone to enable its use by industrial activities and IND4Z-P11 requires the height of buildings within the Zone to meet the operational requirements of the activities, whilst taking into account landscape qualities within the Invercargill District.
5. Types of activities permitted within the zone are agriculture, essential services, freight depot, heavy industry, land transport facility, light industry, storage and sale of fuels. Any activity associated with the investigation, development and operation of renewable energy generation is also a permitted activity in the Zone.
6. All buildings and structures within the Zone are controlled activities up to a maximum height of 35 metres above which the activity status is restricted discretionary. The Zone rules have been structured to enable a range of permitted activities whilst still requiring consent for all buildings or structures, and formation of hard surfaces as a controlled activity.

Horizon Mask

7. In my opinion, the proposed 3 kilometre Horizon Mask is not supported by the technical evidence. The evidence of Mr Morley, together with the AnS Consulting's peer review, demonstrate that any effects on satellite reception are dependent on the characteristics, scale and location of individual structures rather than distance alone.
8. I consider the Horizon Mask to be overly conservative and likely to materially constrain development opportunities anticipated within the Industrial 4 Zone, including heavy industrial activities and renewable energy generation. The proposed restriction has the potential to affect a substantial area of land and create uncertainty for existing and future investment within the Zone.

Electromagnetic Interference Limitation

9. I accept that the amended EMI conditions now closely align with the protections already provided through the existing Radio Spectrum Management framework and associated legislation. For that reason, I consider the resulting effects on activities within the Zone are likely to be less than minor.
10. However, I remain of the view that the EMI restriction largely duplicates protections that already exist and therefore does not appear reasonably necessary to achieve the requiring authority's objectives. I also consider that the designation may create uncertainty for future landowners and operators in circumstances where specialist analysis may be required to demonstrate compliance.

Response to the Section 42A Report

11. I generally agree with the Section 42A Report's conclusions regarding the significance of the Horizon Mask and its potential effects on future development opportunities within the Industrial 4 Zone. I also agree that there is tension between the proposed designation and the objectives and policies that seek to enable industrial development in Awarua.
12. I agree with the Section 42A Report that the Horizon Mask is likely to significantly constrain development within the Zone and that further consideration should be given to alternatives. However, I disagree with the recommendation that the EMI restriction is appropriate, given the protections already provided by the existing radiocommunications framework.

Planning Framework

13. I consider the proposed designation to be contrary to the objectives and policies of the Industrial 4 Zone that seek to provide for large-scale industrial development and renewable energy generation. In particular, the designation is inconsistent with provisions intended to ensure

sufficient land is available for industrial activities and to enable building heights necessary for operational requirements.

14. I also consider there is a tension between protecting the operation of the SpaceOps facility and enabling renewable energy generation. Renewable energy generation receives strong policy support through the Southland Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation.

Economic and Land Use Effects

15. The evidence before the hearing indicates that the designation has the potential to significantly reduce the economic benefits anticipated from development of the Awarua Quadrant. I consider these effects to be relevant when assessing whether the restrictions imposed by the designation are justified and consistent with the purpose of the planning framework applying to the Site.

Response to SpaceOps Evidence

16. I am not persuaded that the proposed conditions provide a clear, objective or certain pathway for development that may exceed the Horizon Mask. The proposed approval mechanisms retain a substantial degree of discretion for SpaceOps and, in my opinion, would create uncertainty for future development and investment within the Site.
17. I also remain unconvinced that all reasonable alternatives have been adequately considered, including reliance on existing EMI protections, exemptions for slender structures such as wind turbines, and alternative approaches to managing potential effects.

Conclusion

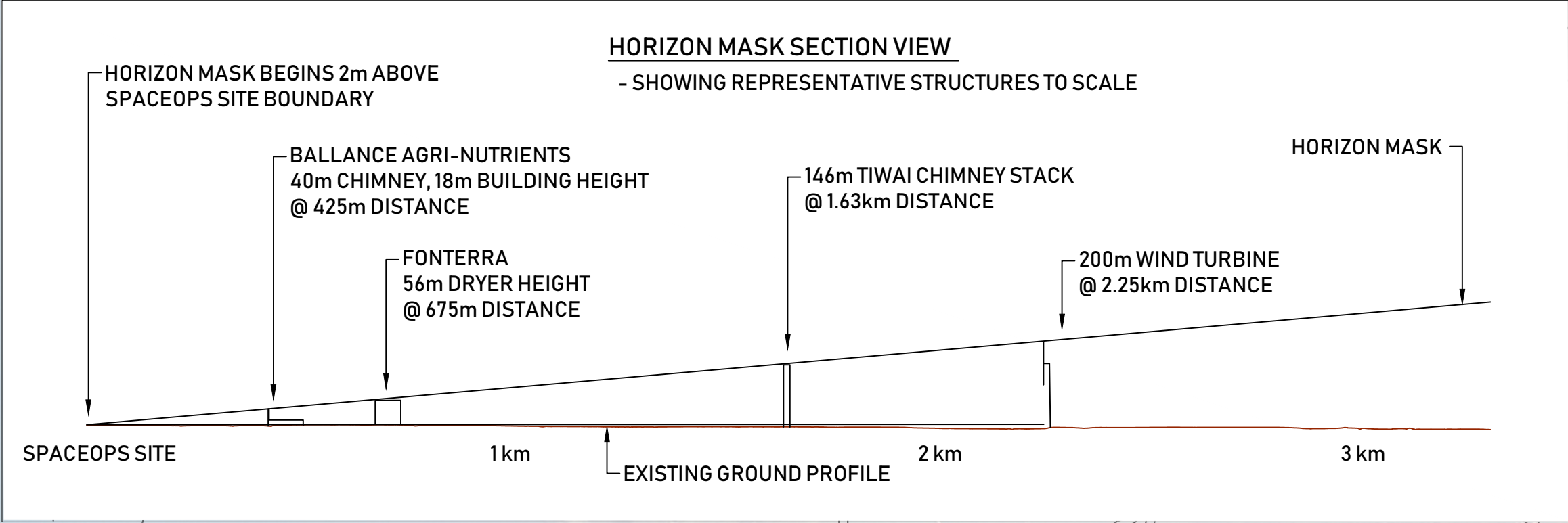
18. Overall, I consider that the proposed Horizon Mask would impose a significant and unjustified constraint on development anticipated within the Industrial 4 Zone. While the amended EMI provisions are likely to result in less than minor effects, they largely duplicate existing regulatory protections and are not, in my opinion, reasonably necessary.
19. For these reasons, I am not satisfied that the proposed designation meets the statutory tests under section 171 of the Resource Management Act 1991. In my opinion, the Notice of Requirement should be refused.



Christine Elizabeth McMillan

28 September 2026

Appendices: Updated Bonisch Horizon Plan 25/09/2026

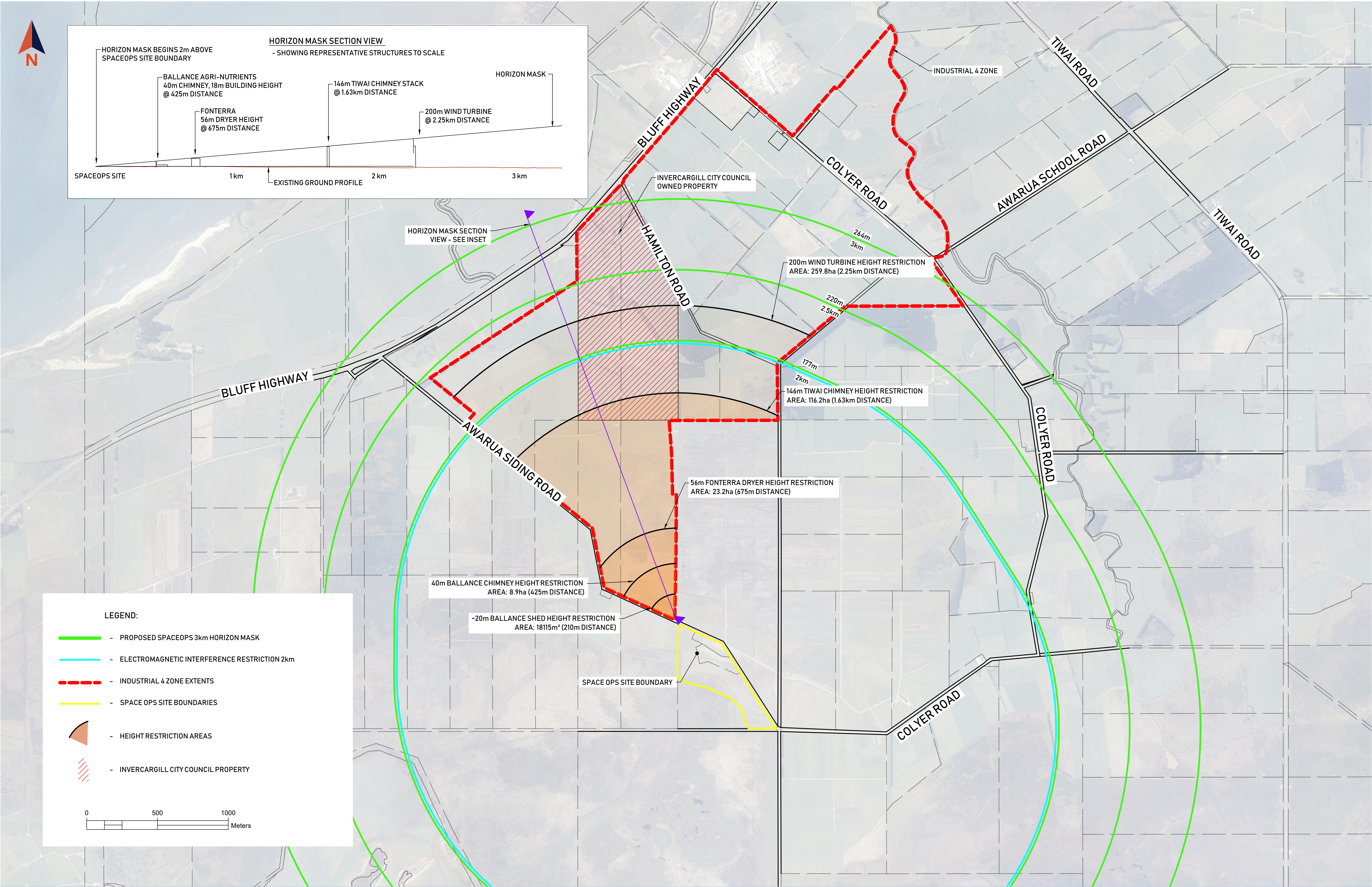


HORIZON MASK SECTION VIEW - SEE INSET

LEGEND:

- - PROPOSED SPACEOPS 3km HORIZON MASK
- - ELECTROMAGNETIC INTERFERENCE RESTRICTION 2km
- - - - INDUSTRIAL 4 ZONE EXTENTS
- - SPACE OPS SITE BOUNDARIES
- HEIGHT RESTRICTION AREAS
- INVERCARGILL CITY COUNCIL PROPERTY

0 500 1000 Meters



CLIENT:	PROJECT:		SHEET TITLE:	REV	REVISION DETAILS	DATE	SURVEYED:			JOB NUMBER	SCALE (@ A1)
STEWART FAMILY ASSETS	SPACE OPS HORIZON MASK		AWARUA QUADRANT HORIZON MASK	A	SPACEOPS HORIZON MASKING PLAN	09/09/2026	DESIGNED:			7795-7	1:12,000
				B	ADD SECTION VIEW AND ELECTROMAGNETIC RESTRICTION AREA	11/09/2026	DRAWN:	SHG	09/09/2026		
				C	ADJUSTED HORIZON MASK TO BEGIN AT SPACEOPS SITE BOUNDARY	15/09/2026	DRAWING CHECK:	CEM	11/09/2026	SHEET	REVISION
				D	ADDED COUNCIL OWNED PROPERTY AND AREAS OF HEIGHT RESTRICTIONS	17/09/2026	DESIGN CHECK:			10F1	E
				E	ADJUSTED SPACEOPS SITE BOUNDARIES FOR FUTURE DEVELOPMENTS	25/09/2026	APPROVED:	CEM	25/09/2026		