

23 December 2021

Silverlight  
C/- Edgar Planning  
1 Kamahi Street  
Wanaka 9305

**Attention: Scott Edgar**

Dear Scott

**ACCOMMODATION – CUMULATIVE NOISE EFFECTS**

This letter provides further information with specific reference to point five in the EPA letter of 13 December 2021 (File ref: FTC000054). This is reproduced below in blue, with our responses inserted where appropriate.

5. *The AEE states at paragraph 9.17 that:*

*“The accommodation use of those buildings may add further activity within the application site but is likely to reduce vehicle movements to and from the site. The buildings within which the accommodation will be provided are well contained within the site and overall, it is considered that the use of those buildings for accommodation purposes will not result in discernible adverse effects on amenity values beyond those that have been addressed through the first fast-track resource consent application.”*

*A similar point is made at paragraph 15.10 of the AEE.*

- a. *Please explain in more detail the possible “further activity within the application site” and the “changes to the activities undertaken on site which could potentially result in additional adverse effects over and above those assessed as part of FTC000027”.*

It is our understanding that the proposed accommodation is intended primarily for use by cast, crew and supporting staff working on site. Where circumstances resulted in excess accommodation being available for a period, the applicant seeks to utilise this for visitor accommodation as an alternative. While these two uses may have differences in the level of servicing and cleaning of rooms, in practical terms this will not affect noise generation. The accommodation operation must be viewed in the context of a site under the unified control of one operator, rather than many disparate and competing operators.

Accommodation on site will require provision of mechanical plant for temperature control and ventilation and servicing (cleaning and rubbish/recycling etc). In our previous assessments we have considered noise from mechanical plant, both as an internal effect that is not compatible with aspects of the sites own activities, and as an external effect that may be experienced beyond the boundaries of the site. In practice the site’s own needs to control mechanical plant noise will ensure that cumulative noise effects of mechanical plant on neighbours is adequately controlled. A condition of consent was recommended that would ensure mechanical plant cumulative noise level and effects were considered on a stage-by-stage basis (i.e. prior to the uplift of building consents for each phase of development). We still consider this appropriate. Similarly, service vehicles were previously considered (as part of the traffic noise) and are not considered to be problematic. Because these service vehicles will be servicing the whole site, any increased number of movements to service the accommodation (no matter which form this takes) will be small and will not result in any increase in adverse effect.

Activities taking place within the accommodation buildings, whether used by workers or travellers will result in negligible effect, if that.

Noise effects that are potential consequences of accommodation activity, but not directly related to the accommodation itself, are discussed below.



- b. *Appendix 17 does not provide the level of assessment required to support many statements in Section 15 of the AEE. Please provide a detailed acoustic assessment of the potential noise effects of the Project on residential and rural neighbours in the vicinity of the site and how any adverse noise effects would be avoided, remedied or mitigated. This assessment should include:*
- i. *daytime and night-time activities of the proposed accommodation unit users, including social functions on any part of the Project site and any proposed restrictions on the use of parts of the Project site to protect residential neighbours' rural amenity;*

Appendix 17 to the accommodation application was a brief comment relating to aircraft noise and was intended to be read alongside our original acoustic assessment for FTC000027 (which was included as part of the accommodation application in the additional appendices bundle). The original acoustic assessment considered noise associated with retail, tourist, and hospitality facilities etc on the application site. These activities would typically be undertaken indoors, and therefore able to be controlled by building sound insulation or, where outside, are well separated from neighbours by both distance and screening afforded by both terrain and proposed buildings. When considering the likely noise levels arising and potential for noise effects, we considered the operation of hospitality facilities at night. The presence, of on-site accommodation will have little effect on this assessment as any increase in predicted noise level will be small, and this will be offset by reduced traffic due to workers commuting to more distant accommodation or visitors going elsewhere for food and entertainment and then returning to site.

The matter of social functions on any part of the proposed site does warrant additional consideration. At present we lack the information required to assess the full range of possible social functions and locations that may be considered likely to be used. Social functions such as group picnics, a community fete or similar gathering are unlikely to require significant setbacks or control to meet an appropriate daytime noise standard. In addition, the Proposed District Plan makes provision for a small number of events to occur as of right with certain restrictions. On the other hand, a large-scale function with amplified music and alcohol would require careful consideration as to where this should occur and the way it is operated.

We suggest that the sites Operational Noise Management Plan (NMP), which will be submitted to Council for approval, have a sub-section that considers this issue and provides guidance appropriate to the type, scale, time, and location of the activity.

- ii. *cumulative noise effects on residential neighbours arising from the use of the accommodation units and conference/ function/ theatre facilities and night-time filming consented through FTC000027;*

As previously noted, the conference, function, and theatre activities all require sound insulation to ensure that activities within are not disturbed by external on-site activities and/or aircraft noise, and that they in turn do not disrupt adjacent on-site activities. Activities within accommodation units do not typically generate sufficiently high noise levels to cause disruption outside the building. Generally, accommodation providers find that they need to consider an enhanced level of sound insulation for the protection of amenity of occupants.

As a result, there will be no cumulative noise effects arising from the use of these facilities together.

Night-time filming was considered in Section 6.4 of our previous noise assessment. We do not consider that the use of the indoor facilities listed above will result in any cumulative effect when considered in conjunction with outdoor filming. We remain of the view that outdoor filming should be primarily controlled using the proposed NMP.

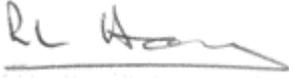
- iii. *any potential noise effects on accommodation unit users of conference/ function/ theatre facilities and night-time filming activities consented through FTC000027.*

For the reasons discussed above we do not consider there to be any likelihood of adverse effect that cannot be addressed via the mechanisms proposed during the building consent for each stage of development. We note that this effect is internal to the site, which is under the control of the developer, who has a vested interest in striking an acceptable balance between different aspects of their proposed operation.

If you have any questions, please contact us.

Yours faithfully

**MARSHALL DAY ACOUSTICS LIMITED**



**Rob Hay**  
**Associate**