



Environmental Protection Agency
By email to: Silverlight.Fasttrack@epa.govt.nz

Edgar Planning Ltd
1 Kamahi Street
Wanaka 9305

Attn: Elliott Dennett

23 December 2021

Dear Elliott,

**COVID-19 Recovery (Fast-Track Consenting) Act 2020 - Silverlight Studios Accommodation -
Further Information**

Thank you for the opportunity to provide further information on the Silverlight Studios Accommodation proposal. We can now address the points of further information (as set out in the Panel's letter of 13 December 2021) as follows:

1.0 Measures to encourage the use of alternative modes of transport

1.1 It is the applicant's expectation and intention that the accommodation will be provided and operated in accordance with the conditions of FTC000027 in addition to the conditions that would be imposed on the accommodation consent. That would include Conditions 127 and 128 which require the preparation and implementation of a Travel Management Plan which will set out how staff and visitors will be encouraged to access the site by shared or active transport modes. That would include the provision of shuttle bus services which would also be made available for staff and visitors accommodated on site.

1.2 Under FTC000027 the Travel MP is required prior to the completion of Stage 2 of the wider development. For completeness Conditions 127 and 128 could be replicated or cross referenced in the conditions of the accommodation consent with the requirement to update the Travel MP required under FTC000027 prior to occupation of the accommodation units.

2.0 Bicycle Storage and EV Charging

2.1 The applicant does intend to provide bicycle storage and EV charging (including charging facilities for electric bicycles). The bicycle storage and charging facilities will be provided within the buildings that contain (or are in the vicinity of) the accommodation units. In addition the

applicant intends to provide lockable charging stations for e-bikes such as the 'Locky Dock' (www.lockydock.co.nz) or similar that will be available to day visitors and crew. The number and location of these charging stations will depend on demand could be in the order to 5 stations each taking up to 10 e-bikes and are likely to be provided at the public car park, the Sound Stage Lot and within the precincts. EV charging for Silverlight and/or production company vehicles will be provided at dedicated parking spaces in the crew car parks with additional EV charging facilities (servicing the fleet of golf carts and shuttle buses) being provided at the Transport Hub and throughout the site as necessary. The number of EV charging stations will again depend on demand.

3.0 Shuttle Bus Service

3.1 As outlined above it is the applicant's intention to provide shuttle buses that will travel to and from the site providing shared transport for staff and visitors. This will be provided through the preparation and implementation of the Travel MP required under Condition 127 of FTC000027 and this condition can be replicated or cross referenced in the conditions of the accommodation consent to make it clear that the shuttle buses are intended to serve not only staff commuting to and from the site and day visitors but also those accommodated on site whether that be cast and crew or visitors not engaged in film production activities.

4.0 On-site PV Generation

4.1 The applicant would accept a condition of consent requiring the installation of PV panels on the Sound Stage buildings as a means of providing electricity to the accommodation units as well as the wider development.

5.0 Description of Activities and Further Acoustic Assessment

5.1 The further activities that will be added to the overall development will be residential and visitor accommodation activities. Those activities will include the movement of people (i.e. vehicle movements) to and from the site and the movement of people around the site on foot, bicycle, scooter or golf cart.

- 5.2 The activities will also include the occupation of buildings for accommodation, and ancillary outdoor activities that would generally be associated with apartment style living such as outdoor living and recreation in the open spaces within the precincts and around the lake.
- 5.3 As outlined in the AEE such activities could potentially result in additional adverse effects however in the context of the wider development approved under FTC000027 it is considered that those effects have already been substantially assessed within the consented footprint and envelope of effects generally and found to be appropriate or manageable.
- 5.4 When occupied by cast and crew the accommodation will reduce or eliminate day to day vehicle movements to and from the site for those now to be accommodated on site. This will result in an overall reduction in vehicle movements and associated noise compared to FTC000027 as granted. Instead of travelling to and from the site and moving between the car parks and the sound stages or production offices cast and crew accommodated on-site will walk, scooter, cycle or travel by golf cart from the accommodation to their place of work and back again. As such movements around the site (for those accommodated on-site) will be slightly different to what they might otherwise be but not to the extent that the difference would be discernible beyond the boundaries of the site. Overall the same amount of movement around the site will occur but a proportion of it will be to and from different locations within the site (accommodation to work place, rather than car park to work place).
- 5.5 Cast and crew will wish to leave the site as and when required however given the long hours that are common in the film industry this is not likely to be on a daily basis. While cast are likely to travel to and from the site by private vehicle the crew that are accommodated on-site (being those engaged on a shorter term, more transient basis) would not generally be provided with a private motor vehicle by the production company and would therefore be encouraged to use the shuttle buses provided.
- 5.6 Overall it is considered that the accommodation of cast and crew on-site is likely to result in a net reduction in day to day vehicle movements to and from the site and will result in no discernible change to movements within the site and associated noise effects.

- 5.7 If/when the accommodation is occupied by visitors not engaged in film production activities those visitors are likely to travel to and from the site more frequently than cast and crew that are accommodated on-site however it should be noted that those additional vehicle movements would coincide with times of reduced vehicle movements associated with film production activities (the accommodation only being made available to visitors at times where there may be a lull in the film production schedule). It is also noted that it would seem likely that visitors who choose to stay on site would visit the site regardless of whether they are accommodated on or off site, the film tourism elements being the draw rather than the accommodation itself. If the on-site accommodation was not available and as such at least some of the vehicle movements associated with the visitor accommodation are likely to occur regardless.
- 5.8 It is therefore considered that the use of the on-site accommodation as visitor accommodation will not result in a net increase in vehicle movements to and from the site, or movements within the site, beyond what is likely to occur under FTC000027 as approved.
- 5.9 Tourism and/or social functions will be subject to the hours of operation and operational noise management requirements set out in FTC000027 and could occur irrespective of whether the accommodation proposal were to be approved. Any such functions would generally be within buildings that include acoustic insulation to ensure that activities within those buildings are not adversely affected by aircraft noise and that those activities do not in themselves result in elevated noise levels at other locations or buildings within and beyond the site.
- 5.10 The provision of on-site accommodation, whether it be for cast and crew or for visitors will result in fewer vehicle movements to and from the site at the beginning and end of functions or events held on-site, and instead of moving to and from the car parks (on arrival/departure) those accommodated on-site will move to and from the accommodation only.
- 5.11 An adverse noise effect often associated with residential and/or visitor accommodation is noise from informal social gatherings. It is considered however that such occurrences can be effectively managed and avoided. The site will be the cast and crew's place of work and a certain level of behaviour will be expected of them with their employment and/or

accommodation on-site being contingent on appropriate behaviour. Visitors not engaged in film making activities will be expected to maintain a similar level of behaviour. In addition management and security will be present on-site 24 hours a day and will be able to address any noise or behavioural issues in the unlikely event that they arise.

- 5.12 It is therefore considered that while the proposed accommodation will add activities to the wider development beyond those approved under FTC000027 those activities and/or associated noise sources are comprised of elements (i.e. vehicle movements, outdoor movement and activities, mechanical ventilation etc) that have been assessed and found to be appropriate through the Marshall Day Acoustics assessment. It is considered that, given the unique nature of the proposal, those elements are not likely to have a discernible cumulative effect beyond what has already been considered and approved.
- 5.13 Mr. Hay of Marshall Day Acoustics has prepared a response to Point 5 which elaborates on the original acoustic assessment and has confirmed that the proposed accommodation activities, in combination with the activities approved under FTC000027, will not result in significant or inappropriate noise effects within or beyond the boundaries of the site.
- 5.14 As outlined above the operational noise management plan required under FTC000027 will apply to the accommodation as part of the wider development and through that the noise effects of the development as a whole will be appropriately managed. In addition it is considered that the review condition included as part of FTC000027, and which could be replicated as part of this consent, will provide ample opportunity to monitor and address any unforeseen consequences or adverse effects associated with the accommodation.
- 5.15 With regard to potential conflict between the proposed visitor accommodation use and night time filming it is considered that the use of the buildings for visitor accommodation is not likely to coincide with night time film making activities in that the accommodation will only be available to visitors when there is a lull in film production activities. In any case if any such conflict were to be anticipated film production activities would take priority over the visitor accommodation use.

6.0 Construction Staging

6.1 The construction and ongoing jobs described in Section 11 and Table 4 of the AEE were estimated in consultation with the applicant’s project manager. As such there is no change to the estimated job numbers as a result of the revised staging of construction. There will however be changes to the staging of the accommodation provision as described at Paragraph 2.13 of the AEE (noting that such staging was indicative only). Based on the amended staging of development set out in Condition 53 of FTC000027 it is likely that the accommodation will be provided in Venice, Paris and then New York as those precincts are constructed.

6.2 Proposed Condition 7 relates to the staging or phasing of the accommodation provision, stating that the accommodation may be provided in accordance with the phasing set out in the application and FTC000027. As there is now some inconsistency between the application and FTC000027 it would be appropriate for Condition 7 to be amended to make reference to Conditions 53 and 54 of FTC000027 with reference to “the application” being deleted.

7.0 Financial Viability

7.1 The financial viability of the wider Silverlight Studios project is not reliant on the accommodation being used as visitor accommodation. The ability to use the accommodation as visitor accommodation will however ensure a more efficient use of resources, enable diversification and economic resilience within the site and will reduce risk for investors and/or production companies such that, in unforeseen circumstances where film production may be halted (due to availability of lead talent for example) and the accommodation would otherwise sit empty.

8.0 Status of Corbridge Appeal

8.1 Silverlight is a section 274 party to the Corbridge appeal, where Corbridge are seeking a Rural Visitor Zone over the site, rather than the notified Rural Zone. It is understood that the appeal is currently due for Environment Court mediation in February 2022.

9.0 s274 Rationale



9.1 The rationale for remaining involved is simply that Silverlight has an ongoing interest in the underlying zoning for the site. For example if any subsequent variations to the conditions of FTC000027 are required, or additional consents are required, the underlying zoning remains relevant. Silverlight is not aware of whether or not Corbridge intends to pursue its appeal.

We trust that the above adequately addresses the various points of further information requested however if any further information or clarification is required please do not hesitate to contact me.

Yours sincerely,
Edgar Planning Ltd,

A handwritten signature in black ink that reads 'Scott Edgar'. The signature is fluid and cursive, with a large, sweeping initial 'S'.

Scott Edgar
Director