



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

Edgar Planning Ltd  
1 Kamahi Street  
Wanaka 9305

Attn: Elliott Dennett

15 December 2021

Dear Elliott,

**COVID-19 Recovery (Fast-Track Consenting) Act 2020 - Silverlight Studios Accommodation -  
Response to Comments**

Thank you for the opportunity to provide a formal response to the comments from the parties invited to make comment on the Silverlight Studios Accommodation proposal. Silverlight Studios' response is as follows:

**1.0 High Society Exports Limited**

1.1 The provision of onsite accommodation will support the wider film studio activities consented under FTC000027 and will help mitigate potential adverse effects on the wider housing market. The proposed accommodation will be separate and distinct from urban areas of Wānaka, Albert Town, Luggate and Hāwea in that it's primary function is to provide accommodation for the on-site workforce and, along with wider film studio development, has been positioned and designed to minimise it's visibility from beyond the boundaries of the site such that it does not appear as urban sprawl. The proposed accommodation is therefore considered appropriate and necessary, and does not constitute a spread of development given that the built footprint that will contain the proposed accommodation has been approved through FTC000027.

**2.0 Otago Regional Council (ORC)**

2.1 The matter of residential earthworks and Rule 14.5.2 of Plan Change 8 was raised in ORC's comments on FTC000027 and were addressed in the applicant's response to those comments. FTC000027 includes bulk earthworks that will enable the construction of the sound stages and the various precincts and villages. As outlined in FTC000027 the buildings within those

precincts and villages would be constructed irrespective of whether they were to include the accommodation that is now proposed under FTC000054. The current application involves the internal fitout and use of the buildings already consented under FTC000027 and does not include any additional earthworks.

- 2.2 Had the applicant been able to include the accommodation element in the original FTC application (as was explored at the time) it would have triggered a resource consent under Rule 14.5.2. Given that the accommodation needed to be pursued as a separate FTC application following the amendment of the referral order neither FTC000027 or FTC000054 trigger a consent under Rule 14.5.2. It is considered that the adverse effects of the earthworks approved under FTC000027 will be appropriately avoided or mitigated through the Environmental Management and Erosion and Sediment Control Plans required under that consent.

### **3.0 Corbridge Estates Limited Partnership (CELP)**

- 3.1 The comments of CELP raise concerns regarding the water supply. These concerns largely relate to irrigation water and are therefore not relevant to the accommodation proposal.
- 3.2 With regard to domestic water supply the accommodation proposal and the wider development does not rely on the onsite bores or the Criffel water scheme to provide a potable water supply. That being said water permit 2003.271 notes under Condition 1 that water may be taken at any time for domestic or stock water purposes. In addition while water permit 10.388.01.V2 does not include a similar note it does not preclude the taking of water for domestic purposes and therefore up to 25,000ltr per day could be taken from the associated bore as a permitted activity under Rule 12.2.2.1 of the Regional Plan : Water for Otago.
- 3.3 The Six Waters Report prepared by CGW includes confirmation from QLDC that, in principle, the Silverlight Studios development (including the on-site accommodation) can be serviced by way of a connection to Council's reticulation. Modelling will be required to determine any necessary upgrades to the existing infrastructure however the applicant has agreed that such

modelling and any associated upgrades will be at their expense. It is therefore considered that a suitable domestic water supply will be achievable.

- 3.4 With regard to the availability of short term holiday accommodation (e.g. AirBnB) it is considered that there is still significant uncertainty as to when international visitors will be able to travel to New Zealand and the extent to which tourism will return to pre-COVID levels. Given however that the proposed accommodation is a response to the potential adverse effects that the wider consented development may have on the local accommodation market it is considered that potential uncertainty around the availability of short term holiday rentals and/or the number of properties that are made available as rentals following changes to tenancy laws would lend weight to the necessity for the proposed onsite accommodation.

#### **4.0 Heritage New Zealand Pouhere Taonga (HNZPT)**

- 4.1 The applicant accepts HNZPT's recommendation that Advice Note 2 is amended to include archaeology if that is deemed necessary by the Panel.

#### **5.0 Mount Barker Residents Association (MBRA)**

- 5.1 The following response is limited to matters relating to the proposed accommodation activity rather than the MBRA's comments on the consent process or the appropriateness of the wider project which has since been granted consent.
- 5.2 Since referral under the Recovery Act was first sought the Silverlight Studios project has evolved however the applicant has endeavoured to be as transparent as possible in terms of what has been proposed and the intention to seek consent for onsite accommodation was noted in the original application for FTC000027 (it having been determined by the MfE that the accommodation component could not be included in the original application as it was considered outside the scope of the referral order).
- 5.3 Again the primary function of the proposal is to accommodate a proportion (up to 30% of the projected 1,200 onsite cast and crew) of the workforce onsite and reduce potential effects on the wider accommodation market. The extent of those effects have been addressed through

the consent process for FTC000027 including further evidence provided to demonstrate how those wider effects can be managed. The secondary use of the accommodation for visitors not engaged in film making activities is intended to enable the efficient use of the apartments, acknowledging the significant investment and resources that it will take to construct and fit out those apartments, if and when there are lulls in film production schedules.

5.4 While the majority of employment opportunities created by the wider development will be within the film industry the applicant considers it is not correct that tourism related jobs (including any associated with the servicing of the accommodation should it be used for visitor accommodation) are of no value to the local or national economy.

5.5 The Strategic Objectives of the Queenstown Lakes Proposed District Plan include the following:

**3.2.1 *The development of a prosperous, resilient and equitable economy in the District.***

*3.2.1.1 The significant socioeconomic benefits of well designed and appropriately located visitor industry places, facilities and services are realised across the District.*

*3.2.1.6 Diversification of the District's economic base and creation of employment opportunities through the development of innovative and sustainable enterprises.*

5.6 The visitor industry is therefore seen as an integral part of achieving a prosperous, resilient and equitable economy within the district and diversification is encouraged. While the wider studios development is not reliant on the occasional visitor accommodation use of the proposed apartments the ability to use the accommodation in that manner will diversify economic activities on site and further enhance the resilience of the development as a whole.

5.7 It is expected that the occasional use of the accommodation as visitor accommodation will contribute to the availability of visitor accommodation in the wider district and may help alleviate peak demand should its availability coincide with peak summer or winter tourism seasons.

## **6.0 Queenstown Airport Corporation**

- 6.1 The applicant is happy to accept QAC's recommended condition requiring the establishment of a procedure to address any complaints from the occupants of the accommodation in relation to aircraft noise from operations at the Wānaka Airport.
- 6.2 Mr. Hay of Marshall Day Acoustics has advised that QAC's request that proposed condition 9 is amended to require that the accommodation is designed to achieve an indoor design sound level of 40dB Ldn within any critical living environments is reasonable and achievable and on that basis the applicant is happy to accept the amended condition.

## **7.0 Queenstown Lakes District Council (QLDC)**

- 7.1 The matters raised in QLDC's comments have largely been addressed through FTC000027. With regard to traffic effects the transport assessment submitted as part of FTC000054 finds that the effects of the proposed accommodation on the safety and efficiency of the roading network can be managed through appropriately timed and designed access upgrades. It is noted that, in their comments on the accommodation proposal, Waka Kotahi accept the findings of the transport assessment in terms of vehicle movements associated with the development.
- 7.2 With regard to noise it is noted that a detailed acoustic assessment has been requested in the ECP's further information request of 13<sup>th</sup> December 2021. That assessment will address potential noise effects in relation to other surrounding rural activities.
- 7.3 Effects on the accommodation market have been considered as part of FTC000027 and the conditions of consent set out measures that are required to mitigate those effects. The conditions of FTC000027 will appropriately mitigate the effects on the wider accommodation market resulting from the workforce (70% or thereabouts) that are not accommodated onsite.
- 7.4 The number of three bedroom apartments set out in the indicative breakdown of apartment configuration is based on industry experience and will be adequate to meet the needs of cast and crew. It is not particularly common for cast and crew to bring their family with them for short to medium term projects and crew who relocate to Wānaka with their family on a longer

term basis are likely to transition into long term accommodation off site as it becomes available.

7.5 It is considered unlikely that, when the accommodation is used for visitors rather than the onsite workforce, those visitors would travel to the district and then remain solely on the Silverlight Studios site. It is expected that visitors would behave in the same way as visitors accommodated off site do and travel around the district, spending money as they go. It is not expected that the occasional visitor accommodation use would result in a noticeable adverse effect on the wider economy in terms of tourism spend off-site.

7.6 Since QLDC's comments were made FTC000027 has been approved. The proposed conditions link the accommodation to the wider film studio development and the accommodation cannot be provided in the absence of the buildings. The wider development is phased such that the sound stages and production offices will be constructed first, and then the precincts which contain the accommodation will be constructed in the following phases. The accommodation and the film studio development and activities are therefore inextricably linked.

## **8.0 Minister for Climate Change**

8.1 Condition 127 of FTC000027 requires the preparation and implementation of a Travel Management Plan which is to include the provision and promotion of shuttle bus services and active transport modes and measures to reduce the number of vehicles coming to site. The Travel Management Plan must set out ways in which staff and visitors will be encouraged to use active and shared transport modes to access the site. It is the applicant's expectation that "staff and visitors" would include those staying onsite in the proposed accommodation. The applicant's response to the ECP's request for further information will elaborate upon this.

8.2 It is also noted that the provision of onsite accommodation will reduce the number of vehicle movements to and from the site during film production (which will be the majority of the time) as up to 30% of the workforce will be accommodated onsite thus avoiding the daily commute.

8.3 It is acknowledged that the proposed accommodation will result in increased on-site energy demands albeit that, if the onsite accommodation were not approved, those energy demands

would still likely occur off-site. The applicant is prepared to offer a commitment to the provision of solar panels as part of the wider development and would accept a condition to that effect. This will be elaborated upon in the response to the ECP's request for further information including suggested wording for such a condition.

## **9.0 Te Rūnanga o Ngāi Tahu**

9.1 The applicant acknowledges and appreciates the general support of Ngāi Tahu.

## **10.0 Waka Kotahi / New Zealand Transport Agency (Waka Kotahi)**

10.1 The applicant acknowledges and appreciates Waka Kotahi's general support for the worker accommodation element of the proposal. With regard to its use as visitor accommodation the applicant would reiterate that the primary use of the accommodation will be to accommodate the onsite workforce and will only be used for visitor accommodation when not required for that primary use. Given the intended operating structure whereby a production company will take a long term lease on the studios it is likely that the primary lessee will seek to maximise the productivity of the lease such that film and television production is kept reasonably constant. It is therefore likely that the accommodation will only become available for visitors occasionally. It is considered that the intermittent use of the accommodation will not materially change the character of the development and will result in no change to its external appearance or visibility beyond the boundaries of the site. The consented precincts within which the proposed accommodation will be located have been carefully designed and positioned such that it will not be highly visible from beyond the boundaries of the site. The proposed use of the now consented buildings will not alter their appearance.

10.2 The development as a whole is unique within the District and New Zealand in general. It is considered that the proposal includes a wide range of characteristics and circumstances that would set it apart from other visitor accommodation or resort style development that might seek to establish in the area or wider Rural Zone. It is therefore considered that the proposal will not create a precedent in this regard.

- 10.3 With regard to travel management it is noted that visitors that may be accommodated on site are likely to visit the site regardless of whether they are accommodated on site or in the wider District. If visitors are not accommodated on site they may choose to be accommodated in Wānaka, Albert Town, Luggate, Hāwea or the rural zones of the District. They may also choose to be accommodated on Queenstown or outside of the District. Visitors to the Queenstown Lakes District generally come to experience the outdoor opportunities that the District has to offer. That often includes trips by private vehicle around the District.
- 10.4 The TMP required by the conditions of FTC000027 would also apply to the accommodation element and the shuttle buses that have been proposed would be available to visitors regardless of whether they are accommodated on or off site. It is therefore considered that the occasional use of the accommodation as visitor accommodation is not likely to result in a noticeable increase in vehicle movements associated with tourism in the District generally.
- 10.5 The applicant is happy to accept Waka Kotahi’s suggestion that the site access is upgraded to a roundabout prior to the accommodation being made available (as visitor accommodation) to the general public.
- 10.6 There is no expectation that the accommodation could be given effect to as a standalone activity.
- 10.7 With regard to conditions of consent it is considered that the proposed conditions are appropriate and adequately tie the accommodation to the wider film studios development and the conditions of FTC000027. If the Panel finds that not to be the case it is considered that better integration could be achieved through minor amendments to the proposed conditions rather than through an integrated set of conditions for both consents.

## **11.0 New Zealand Infrastructure Commission (NZIC)**

- 11.1 The applicant acknowledges and appreciates the general support of the NZIC.

- 11.2 It is considered that potential reverse sensitivity effects on the ongoing operation of the Wānaka Airport can be appropriately avoided or mitigated through the proposed conditions of consent.
- 11.3 Development Contributions will be payable as the development is progressed and will account for the proposed accommodation use. Those contributions will be in addition to any necessary service upgrades that are required to enable connections to Council's water supply and wastewater reticulation which will be at the applicants expense.
- 11.4 The conditions of FTC000027 and in particular Condition 133 adequately addresses the need for maintenance and repairs on the public road network that may arise during construction.

Yours sincerely,  
**Edgar Planning Ltd,**



Scott Edgar  
**Director**