

Your Comment on the Silverlight Studios Accommodation

All sections of this form with an asterisk (*) are mandatory.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Waka Kotahi NZ Transport Agency		
*First name	Richard		
*Last name	Shaw		
Postal address	N/a – please use email contact		
*Home phone / Mobile phone	██████████	*Work phone	03 964 2809
*Email (a valid email address enables us to communicate efficiently with you)	Richard.shaw@nzta.govt.nz		

2. *We will email you draft conditions of consent for your comment

<input checked="" type="checkbox"/>	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct
-------------------------------------	------------------------------------------------------	--------------------------	----------------------------------------------------------

3. Please provide your comments on this application

SUMMARY OF THE PROPOSAL

Waka Kotahi NZ Transport Agency (Waka Kotahi) understands the current Fast track consent application (FTC000054) is to include accommodation into and as part of the overall Silverlight Studios Fast track consent proposal (FTC000027). The wider proposal has just been granted consent subject to conditions, but is still open to appeal on points of law. The application provides updated floor plans that show accommodation to be added to the buildings for the proposed Venice, Paris and New York precincts. Some areas on the floorplans remain labelled “Vacant for Use TBC” and the application notes additional accommodation may be provided in these areas should it become necessary. The intention is to provide accommodation for between 20 to 30 percent of the 1200 strong work force

(based on single occupancy). The accommodation provided will be a mix of studios, 1 bedroom, 2 bedroom and 3 bedroom apartments. The applicant notes 314 bedrooms will be provided.

The application further notes that when the accommodation is not occupied by cast and crew it may be available for visitor accommodation (i.e. short stay accommodation for visitors to the District that are not engaged in film production or film school activities).

The accommodation application will form part of the wider Silverlight Studios project and if given consent both applications will be merged and constructed as part of the overall staged development of the site.

No additional works or amended staging are proposed to the improvements to the State Highway 6 (SH6) access to the site as a result of the accommodation component being included. The staging of the access improvements are aligned with the project staging as detailed in the wider Silverlight Studios application (FTC000027) and have been provided for in the confirmed conditions.

WAKA KOTAHI NZ TRANSPORT AGENCY COMMENTS

In a national context, State highways are an integrated national network of inter-regional and inter-district routes, and major urban arterials. While State highways form part of a wider roading network in New Zealand, the distinguishing function of State highways among others are to:

- a. Connect major centres of populations;
- b. Provide access to ports, major industrial areas, major primary production areas and major tourist areas;
- c. Service major urban corridors.

SH6 which adjoins the proposed Silverlight Studios site, is classified as an Arterial road in accordance with the Transport Agency One Network Road Classification. Arterial roads make significant contribution to social and economic wellbeing and linking regionally significant locations. SH6 in this location demonstrates this importance as it links Wanaka with Cromwell, Queenstown and the Wanaka and Queenstown airports.

Worker Accommodation versus Visitor Accommodation

We note the traffic assessment in Appendix 10 of the application states there is little difference in terms of traffic effects at the site access between using the proposed accommodation for worker and/or visitor accommodation. The traffic assessment also notes that the use of the accommodation for visitors to the site will not require a change in the timing for the proposed upgrading of the site access. The improvements can continue to be staged with the initial upgrade to include a right-turn bay and separated left slip lane at the beginning of the development, and ultimately to a roundabout prior to the site being opened to the public.

Waka Kotahi accepts the traffic assessment conclusions to the extent that they do not undermine the conditions already approved as part of the wider Silverlight Studios application (FTC000027) for the staged upgrading of the site access.

In considering the strategic planning implications, which include other matters than the direct traffic effects of the proposal, Waka Kotahi supports the inclusion of the accommodation component of the application for use as worker accommodation. However, the proposed use of the accommodation by tourists and other visitors when not in use by workers, and unrelated to the primary use of the site, is not supported for the following reasons:

- By allowing the accommodation to be used for visitors unrelated to the film production and film school activities, the character of the proposal could change from a large scale special employment style activity to more of a mixed urban area and/or tourist/visitor resort style development. The site is located in the rural zone outside the Wanaka Urban Growth Boundary and if it becomes urban in nature it will be inconsistent with the outcomes anticipated in the recently adopted Queenstown Lakes Spatial Plan. If this was to occur it would be considered a poor planning outcome, resulting in ribbon development along SH6 as well as urban sprawl from Wanaka east towards Luggate.
- Waka Kotahi are also concerned by the precedent of allowing tourist/visitor accommodation or resort style development on the site as it has the potential to create a precedent for other tourist/visitor accommodation wanting to establish in the area.

If the panel are of a mind to grant consent for workers accommodation, Waka Kotahi would request that conditions are included to ensure that the primary use of the accommodation is ancillary to the wider film studio and film school use. The conditions should also clearly delineate the circumstances and nature of the appropriate use of the accommodation for tourists and visitors.

Travel Management

For the wider Silverlight Studios application, (FTC000027), Waka Kotahi suggested that the site, as a significant development and employment hub, would benefit from a travel management plan. The travel management plan was intended to include measures to encourage the reduction in emissions by reducing the number of vehicles coming and going from the site. From the draft conditions that Waka Kotahi have commented on through the wider application process, conditions on travel management planning seem likely to be adopted.

Waka Kotahi considers that if the current Silverlight Studios Accommodation application (FTC000054) is adopted in its entirety, by allowing the proposed accommodation to be used by the public when not in use by workers, this will undermine the intent of the travel management plan for the site and make the site more car centric. Tourists using the accommodation are likely to use their vehicles more often driving to the site and then potentially to other attractions in the area. When compared to staff staying on the site, it is considered they will have less trips and could be coordinated through the use of shuttle or shared transport to and from the site.

The Government has set up the Climate Change Commission and has a target to reduce carbon by 2050 through the Climate Change Response Act 2002, which has since been amended by the Climate Change Response (Zero Carbon) Amendment Act 2019. Transport is currently responsible for 47 percent of total domestic carbon emissions. To meet the Government targets the total transport emissions will need to be dropped by 41 percent in the next 14 years to meet the first set of emissions budgets for New Zealand. The draft Emission Reduction Plan sets out a preliminary target of reducing vehicle kilometres travelled (VKT) by cars and light vehicles by 20% by 2035, to meet these carbon reduction targets. Through the provisions of an effective travel management plan and limiting accommodation onsite to only workers accommodation would contribute towards the reduction target in VKTs, vehicle emissions and the policy for reduction in emissions as outlined in the Government Policy Statement on Land Transport 2021.

We also consider the travel management plan and shared path conditions for the wider Silverlight Studios proposal (FTC000027), are relevant to the accommodation application and it should be ensured that the consent conditions covering these aspects also apply to the accommodation component.

Staging of Construction and Consent Integration

The construction staging confirmed through the wider Silverlight Studios consent (FTC000027) is as follows:

- **Stage 1** will comprise site preparation works that can be implemented while the necessary design work, documentation and approvals for the future stages are being progressed.
- **Stage 2** will comprise bulk earthworks and the construction of the first group of sound stage buildings.
- **Stage 3** will comprise the construction of Sound Stages Alpha to Echo and Workshops 1 and 2 and Wardrobe 1.
- **Stage 4** will comprise the construction of the Italian Village
- **Stage 5** will comprise the construction of the Seaside Village.
- **Stage 6** will comprise the construction of Venice.
- **Stage 7** will comprise the completion of the lake.
- **Stage 8** will comprise the construction of Paris.
- **Stage 9** will comprise the construction of New York.
- **Stage 10** will comprise the construction of Sound Stages Foxtrot to Juliette and associated workshop and wardrobe building.
- **Stage 11** will comprise the construction of the Film Tourism Sites

Waka Kotahi also understand from the current application, that the proposed accommodation will be fitted out within the buildings for each relevant precinct as and when required.

As part of the Waka Kotahi comments on the altered construction staging and request for further information from the EPA dated the 25 November 2021, amendments to the draft conditions relating to the upgrade to the SH6 access were suggested, these conditions have now been confirmed in the wider consents granted as follows:

- 116. Prior to the commencement of Stage 2 of the Project, the consent holder must upgrade the existing access intersection (being the intersection of 'Road 1' and State Highway 6) to include (as a minimum) a right turn bay and separated left turn lane.**
- 117. Prior to undertaking the upgrade of the existing access intersection, the consent holder must provide safety audited design plans (prepared by a suitably qualified and experienced expert as approved by Waka Kotahi NZTA as the road controlling authority) for the upgrade to Waka Kotahi NZTA for their approval.**
- 120. Prior to the completion of Stage 11 of the Project, or the site being open to the public, or 31 December 2027 (whichever is earlier), the consent holder must provide to Waka Kotahi NZTA safety audit design plans prepared by a suitably qualified and experienced expert (as approved by Waka Kotahi NZTA as the road controlling authority), and obtain approval from Waka Kotahi NZTA for the upgrade of the main site access intersection to a roundabout.**
- 121. The consent holder must not undertake any works beyond those relating to Stage 11 of the Project, or the site being open to the public, or 31 December 2027, (whichever is earlier), until the roundabout referred to in condition 120 is constructed and operational.**

It is assumed that the construction staging for the site proposed in the wider application will remain the same for the accommodation application. It is noted that the construction of the Paris, New York and Venice precincts which will include the accommodation component will all occur prior to Stage 11.

Therefore, if consent, is granted to include short term visitor accommodation as well as worker accommodation the confirmed conditions would be relevant to both applications. We would expect if both applications are granted by the Panel and given effect to, both consents will be integrated and the construction and use of the site will be managed conjointly, hence the conditions that apply to one application will apply to the other where relevant. If this is not the case, we would expect the conditions outlined above to be included as part of the accommodation consent conditions.

As a result, the expectations of Waka Kotahi for the accommodation application are the same as for the wider application, that is, the roundabout shall be in place prior to the site becoming open to the public (assumed to be Stage 11). It is assumed this would include any use of the proposed accommodation by tourist and visitors other than workers (i.e. Waka Kotahi would expect the roundabout to be in place prior to the use of the onsite accommodation by members of the public who are not onsite workers or staff).

We would also expect the accommodation application, if granted consent, would not be able to be given effect to or be a standalone consent unless it is being developed as a component of the wider Silverlight Studios proposal which has been granted consent.

Application - Proposed Consent Conditions

The proposed consent conditions as lodged with the application do not go far enough in addressing Waka Kotahi concerns detailed above or ensuring that the mitigation required for the separate applications for the development of the site are well integrated. It is recommended that if the

Silverlight Studios Accommodation consent (FTC000054) is approved, then an integrated set of conditions is developed and agreed for the entire proposal.

CONCLUSION

If the panel are of a mind to grant consent to this application, Waka Kotahi considers the matters raised in our comments including amendments to the suggested proposal and suggested conditions will be required to appropriately address our concerns. Waka Kotahi is happy to provide further input and/or work with the applicant and Panel to ensure the issues outlined above are resolved through appropriate consent conditions.

I trust these comments from Waka Kotahi are adequate to detail our position and concerns.

Yours Sincerely



Richard Shaw
Team Lead South – Poutiaki Taiao / Environmental Planning
Waka Kotahi NZ Transport Agency

Thank you for your comments