



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

Edgar Planning Ltd
1 Kamahi Street
Wānaka 9305

Attn: Elliott Dennett

26 November 2021

Dear Elliott,

COVID-19 Recovery (Fast-Track Consenting) Act 2020 - Silverlight Studios - Planning Comment on Effects on Local Housing Market

The following planning commentary is offered to assist the Panel in light of the outcome of the Panel directed caucusing between Ms. Hampson and Mr. Harris. Specifically this commentary focusses on the assessment of economic effects and how that relates to the Recovery Act and anticipated development and growth within the Queenstown Lakes District.

As the Panel will be well aware the purpose of the Act is to urgently promote employment to support New Zealand's recovery from the economic and social impacts of COVID-19 and to support the certainty of ongoing investment across New Zealand, while continuing to promote the sustainable management of natural and physical resources.

There appears to be agreement that the Silverlight Studios project will comfortably achieve the purpose of the Act in terms of urgently promoting employment and supporting ongoing investment across New Zealand. Disagreement between Ms. Hampson and Mr. Harris instead relates to the extent to which the sustainable management of natural and physical resource will be achieved, and specifically the extent to which the effects of direct, indirect and induced employment on the local housing market can be (or indeed needs to be) managed such that those effects are no more than minor.

Silverlight Studios Limited accept and agree that the effects of project on the local housing market resulting from direct employment should be managed such that those effects are no more than minor. The evidence of Ms. Hampson and Mr. Allen demonstrates that to be achievable. There are clear, realistic and proven plans and strategies that can be implemented to ensure that the onsite construction and film production workforce can be accommodated without resulting in adverse effects on the local housing market that are more than minor.

Indirect and induced employment and associated effects on the local housing market are harder to quantify as they depend on a broad range of variables including how the market chooses to respond to the Silverlight project. Many of those variables are outside of Silverlight Studios Limited's control. That being said, Ms. Hampson finds that the effects of indirect and induced employment on the local housing market are not likely to be more than minor.

In terms of the assessment of effects the Recovery Act requires, at Clause 31(1)(a) of Schedule 6, that the panel must have regard to any actual and potential effects on the environment of allowing the activity. It is accepted that the effects on the local housing market resulting from direct employment associated with the Silverlight Studios project are a relevant consideration.

Clause 31(4) of Schedule 6 however states that the panel may disregard an adverse effect of the activity if the plan permits an activity with that effect.

The Proposed District Plan includes a wide range of zones which are intended to give effect to the Strategic Objectives and Policies of the Plan which in turn are intended to give effect to higher order policy documents include the National Policy Statement on Urban Development 2020.

Within the various District Plan zones there are a wide range of permitted activities which are intended to enable and accommodate economic development and population growth. Within the residential zones (Large Lot Residential, Lower Density Suburban Residential, Medium Density Residential and High Density Residential Zones and the Settlement Zone) the construction of dwellings is a permitted activity and infill development is encouraged and enabled.

Within the Wānaka and Queenstown Town Centre Zones the establishment of residential and commercial activities are a permitted activity (subject to applicable standards).

A wide range of commercial, industrial and service activities are provided for as permitted activities within the Local Shopping Centre, Business Mixed Use, General Industrial and Service, Three Parks Commercial and Three Parks Business Zones.

Airport activities are a permitted activity within the Airport Zone in Queenstown, as are buildings within Precinct A of the Queenstown Airport Zone.

While buildings within the Town Centre Zones and the various commercial or industrial zones generally require resource consent those consents are (subject to compliance with relevant standards) restricted discretionary activities with Council's discretion limited to urban design, signage, lighting, servicing, access and other such matters.

Within the Rural Zone temporary filming (including the construction of temporary buildings) is a permitted activity for up to 200 people and 30 days per year per site or location within a site¹. Given that QLDC's economic development strategy seeks to encourage and attract film productions to the District it is not fanciful to consider that multiple screen productions could be attracted to the District each shooting in multiple locations with multiple units of up to 200 people without any resource consent required.

Significant business and population growth is therefore enabled by the District Plan, often as permitted activities. Where resource consents are required those consents are often restricted discretionary activities with no ability or direction to consider effects on the local housing market.

It is considered that the effects of the onsite construction and permanent workers on the local housing market can be appropriately managed such that those effects are no more than minor.

The extent of indirect and induced employment and its effect on the local housing market is likely to depend on how the market (being local businesses) chooses to respond to the Silverlight Studios project and those effects could occur through the establishment and expansion of businesses (including the construction of dwellings) as a permitted activity under the District Plan.

Similarly business and population growth could continue to occur, or could significantly increase as a result of development that is enabled by the District Plan with or without the Silverlight Studios project. For example an influx of new residents (both nationally or internationally) seeking to relocate to Queenstown Lakes District post-Covid could drive or extend a building boom enabled by the District Plan which may bring with it similar direct, indirect and induced employment and associated effects on the housing market as those that may be associated with the Silverlight Studios project.

¹ As provided for under Rule 35.4.8 of Chapter 35 - Temporary Activities & Relocated Buildings



It is therefore considered that it would be reasonable and appropriate for the effects of indirect and induced employment on the local housing market to be disregarded on the basis that those effects could occur as a result of permitted development within the District as enabled by the District Plan.

In addition, with regard to the s104D gateway test, it is considered that if the panel finds that indirect and induced employment and its effect on the local housing market cannot be disregarded and that those effects cannot be mitigated to the extent that they are no more than minor the Silverlight Studios project could still pass through the s104D gateway test on the basis that it is not contrary to the objectives and policies of the District Plan when read as a whole.

It is acknowledged that the project is at least inconsistent with, and in the opinion of QLDC is contrary to, the objectives and policies of the Proposed District Plan in relation to urban development and the avoidance of urban development outside of the urban growth boundary. It is considered however that the fact that the project is inconsistent with or contrary to those objectives and policies does not necessarily mean that on balance the proposal is contrary (in the sense of being repugnant) to the objectives and policies of the Proposed District Plan as a whole.

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