



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

Edgar Planning Ltd
1 Kamahi Street
Wanaka 9305

Attn: Sandra Balcombe

24 September 2021

Dear Sandra,

COVID-19 Recovery (Fast-Track Consenting) Act 2020 - Silverlight Studios - Request for Further Information

Thank you for the opportunity to provide further information on the Silverlight Studios project. We can now address the points of further information (as set out in your letter of 10/09/21) as follows:

1.0 Transportation Assessment Peer Review

1.1 Andy Carr of Carriageway Consulting has been in discussion with Dave Smith of Abley Consulting who is carrying out the peer review on behalf of NZTA / Waka Kotahi. Mr. Smith has advised that the peer review is being completed and will inform Waka Kotahi's comment on the project. At this stage Silverlight Studios do not have a copy of the peer review to provide to the panel. Mr. Carr has pointed out that the peer review is a technical assessment which Waka Kotahi will interpret, choosing to adopt, disregard or add elements as they see fit.

2.0 Economic Impact Assessment

2.1 Market Economics have advised that quantitative data on the likely nature, scale and duration of the potential negative effects of the proposal on the housing market is not readily available and the number of variables at play make it particularly difficult to predict and quantify the likely price response with any degree of reliability. That being said Market Economics have noted that the significance of this potential housing (including rental) price pressure is likely to be short term as the market can be expected to find a new equilibrium with increased supply resulting over the long term. Market Economics, who have prepared QLDC's Housing

Development Capacity Assessments, have confirmed that there is more than sufficient plan enabled and commercially feasible capacity in the District Plan for this to occur in the Wānaka Ward over all time periods.

- 2.2 In the short term, the housing market is less flexible as it will take time for more housing to be constructed to meet the sudden demand increase (lag effects associated with construction). That said, there is a large number of dwellings used for short term accommodation (with Wanaka having some of the highest number of Airbnb listings in the country). While tourism demand is low, there is anecdotal evidence that many of these homeowners have switched to provide for long term rental instead to ensure continued income from their investment properties. The supply of short-term accommodation dwellings (including minor dwellings/residential flats and to some extent private holiday homes) in the Wānaka Ward market means that a portion of demand could be absorbed relatively seamlessly. This could be expected to soften any potential pressure in the short term but not eliminate that potential. Further, given that there will be a construction period for the studios before the work force arrives, this may provide sufficient time for some supply increases – i.e. by agile investors setting out to capitalise on the expected housing demand.
- 2.3 In addition Silverlight Studios will include a housing department, as is common practice in the film industry, to arrange accommodation for cast and crew. The Silverlight Studios housing department will work to establish a network of holiday homes and rental accommodation that they can call upon as necessary. The housing stock in the Wānaka Ward includes a particularly high proportion of largely unoccupied holiday homes and it is expected that the owners of those properties may be more comfortable making them available to an established and reputable company than letting them to unknown individuals. It is therefore expected that otherwise unoccupied holiday homes may become available to Silverlight Studios, helping to ease pressure on the wider accommodation market.
- 2.4 Silverlight Studios do intend to provide onsite accommodation for cast and crew, seeing it as their responsibility to provide accommodation for at least some of the workforce that will be brought to the district as a result of the project so as to minimise adverse effects on the wider housing market. To that end Silverlight Studios have made an application for referral of the

accommodation element for fast track consent processing under the Recovery Act and the Minister for the Environment has decided to refer the accommodation project (by amending Schedule 10 of the COVID-19 Recovery (Fast-track Consenting) Referred Projects Order 2020) to enable the Silverlight Studios Project to include residential and visitor accommodation. It is understood that the MfE has provided the EPA and the Panel Convener with a copy of all documentation regarding to the Silverlight Studios Accommodation project, including the notice of decision letter.

- 2.5 It is proposed to provide accommodation for up to 30% of the Silverlight workforce within the Venice, Paris and New York precincts. Accommodation will be provided by fitting out apartments in buildings that would otherwise be vacant or used for storage. The apartments will be provided in a range of configurations including studio apartments and one, two and three bedroom apartments.
- 2.6 The provision of onsite accommodation will help mitigate the potential adverse effects on the local housing market as well as allowing Silverlight Studios to operate as its own 'bubble' should the need arise.
- 2.7 Market Economics have provided some further commentary on potential housing market impacts in relation to this subsequent application for onsite accommodation and what economic effects this may have. A copy of that commentary is enclosed.
- 2.8 In addition it is expected that a proportion of the Silverlight workforce will be made up of the local resident population with the film school providing training opportunities for local residents looking to transition into the film industry. It is expected that the training and employment of established local residents will also assist in further mitigating the potential adverse effects on the local accommodation market.

3.0 Adjoining Landowner Consultation

- 3.1 Notes from discussions with adjoining landowners are enclosed. Those notes were not included in the original application as Silverlight Studios did not want to be seen to be speaking for the adjoining landowners or trying to put a positive spin on those discussions (the notes

recording that the discussions appeared to be largely positive). Silverlight Studios are mindful that the adjoining landowners have been given the opportunity to make formal comment on the proposal and upon reflection and review of the full proposal the comments that they choose to make may differ from those initial discussions or Silverlight Studios' interpretation of those discussions.

- 3.2 Given that the notes are from informal discussions and that the adjoining landowners may not want their initial comments to be made public Silverlight Studios request that the enclosed notes are redacted from any publicly available version of this response.

4.0 Temporary Filming Management Plan

- 4.1 A Temporary Filming Management Plan was not prepared as part of the application however an indicative management plan template, which sets out a rough format and the likely matters to be addressed in the eventual Temporary Filming Management Plan is enclosed. The actual Temporary Filming Management Plan will be developed in consultation with the leaseholder for the studios prior to commencement of filming as the Management Plan will need to provide for and manage the effects of any particular requirements that the leasing production company may have.

- 4.2 In addition the Temporary Filming Management Plan will be informed by the Noise Management Plan that will be developed for the wider Silverlight Studios operations.

5.0 Solid Waste Management

- 5.1 Matt Allen of RCP (project management consultants) has advised that the quantification of solid waste anticipated at the various stages of development is not currently possible without a greater interrogation of the materials and techniques selected for the construction of the various stages and precincts. Given the dual purpose of the precincts, being stage sets and occupied buildings, the building designs will be quite unique and details typically non-standard. However we can sensibly articulate the approach and principles of waste management the project will pursue, with a focus on reduction and recycling approaches that are intended.

5.2 The project can be broadly broken down into the following typologies of construction;

- a. Earthworks and Lake – the earthworks proposed are extensive but cut and fill volumes have been carefully balanced in order that no bulk cut material will be exported from the site. Any material that is unsuitable for construction (if any) will be retained on site and reused in the landscaping.
- b. Sound Stages – these buildings are typically concrete clad industrial structures and the concrete panels will be largely prefabricated off-site, minimising in-situ construction activities. Whilst this building typology is fairly new in New Zealand, the notion of pre-fabrication for sound stage buildings is well developed overseas and will be investigated by Silverlight for adaption to this project’s specific requirements. The Main Contractors procured for these buildings will be required to develop and record a Waste Minimisation Plan in accordance with the Rebri Guidelines, that will be specified by the architect. An example Rebri Waste Minimisation Plan template is enclosed.
- c. Precincts – these buildings are either lightweight timber framed structures (residential scale) or steel-framed light commercial structures with typically lightweight rainscreen cladding, that may be interchangeable depending on future filming requirements. Where off-site pre-fabrication is possible (by companies such as Concision or Hector-Eggar), this will be deployed to minimise the number of on-site tradespeople required and minimise waste. As with the sound stage buildings the Main Contractors procured for these buildings will be required to develop and record a Waste Minimisation Plan in accordance with the Rebri Guidelines, that will be specified by the architect.
- d. Landscaping & Civil Construction – typical construction techniques are envisaged and waste will be managed in the usual manner for this type of work.

5.3 In addition to the above Ra Vincent of Silverlight Studios has provided some information on waste minimisation strategies that will be used in the creation of the thematic exteriors of the

proposed buildings. Mr. Vincent advises that the exteriors of the studio buildings, the internal roading and footpaths and the themed exteriors of 70% of the precinct buildings will be made from concrete and plaster. Concrete and plaster waste from those building processes will be crushed for aggregate to be reincorporated into the build. Valuable steel waste will either be reused or will be sold as scrap for recycling and reuse off site.

- 5.4 Timber form work and boxing will be reused until it is no longer fit for purpose at which point it will be chipped for use in concrete insulation and lightweight cement bulking.
- 5.5 Timber finished buildings will be fabricated from select timbers that are usually rustic for the purpose of theming. Any offcuts of this building process will be kept for manufacturing props, furniture and future repairs.
- 5.6 The largest obvious hard waste associated with the finishing and fit out of the thematic buildings is from packaging and it is the applicant's intention to order as much bulk and unpackaged materials as possible to reduce plastics and other nonrecyclable by products.
- 5.7 In addition Silverlight Studios intend to develop a waste minimisation strategies for day to day operations including food and beverage services for both public (tourism) and private (film production) operations.
- 5.8 The film industry as a whole is becoming increasingly conscious of its carbon footprint and is implementing strategies and initiatives to reduce film production waste. The multiuse approach to the provision of the film infrastructure at Silverlight Studios is central to the reduction in waste associated with the construction of sets. The exteriors of the buildings and various precincts will be designed and constructed to be interchangeable and reusable such that they can appear as multiple different locations or time periods.
- 5.9 Film studios and productions, both within New Zealand and internationally, routinely employ green tracking and sustainability teams to track and minimise the carbon footprint of each production. This includes the use of very detailed carbon accounting systems for all aspects of film production (e.g. fuel, travel, materials, catering etc). This information then feeds into the

continual review and improvement of industrial best practice to reduce the carbon footprint of future productions.

5.10 In addition the film industry is increasingly implementing initiatives to reuse, recycle and redistribute materials, sets, props and costumes. These initiatives will be incorporated into Silverlight Studios' day to day operations.

5.11 So while it is not possible at this stage to quantify the volume of solid waste that will be generated on site there are waste minimisation strategies that can and will be implemented through each phase of the development and its ongoing operation.

6.0 Plan of Adjoining Properties

6.1 A plan showing the adjoining properties/landowners as referenced in the AEE and landscape and acoustic assessments is enclosed.

7.0 Helicopter Operations

7.1 At this stage Silverlight Studios do not propose to have helicopters operating from the application site. The Wānaka Airport is conveniently located a short distance to the east and any transportation of crew, cast or directors will operate from the airport.

7.2 The use of helicopters for filming is rare and any such operations will again originate from the airport and will be undertaken in accordance with the airport's air traffic control requirements.

7.3 The use of helicopters for other purposes is not planned however helicopter flights could potentially be required in emergency situations. Any such flights would be a permitted activity under the Proposed District Plan and would be controlled by Civil Aviation requirements.

7.4 In the event that a future lease holder requires the operation of helicopters from the site those activities would be addressed through a future resource consent application and/or in consultation with the Wānaka Airport.



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 long horizontal stroke at the beginning.

Scott Edgar
Director

Enclosures:

Market Economics Commentary on Accommodation Proposal

Consultation Notes

Silverlight Studios Indicative Temporary Filming Management Plan Template

Rebri Waste Minimisation Plan Template

Referenced Properties Plan