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# Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

*This form is for local authorities to provide comments to the Minister for the Environment on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.*

Local authority providing comment	Otago Regional Council
Contact person (if follow-up is required)	Joanna Gilroy
	s 9(2)(a)

## Comment form

Please use the table below to comment on the application.

Project name	Silverlight Studios Accommodation
General comment – potential benefits	No Comment. This question would best be addressed by the District Council.
General comment – significant issues	No Comment.
Is Fast-track appropriate?	There is no reason why this application could not go through the standard RMA consent process within the statutory timeframes.
Environmental compliance history	There is no Otago Regional Council compliance or enforcement history with Silverlight Studios or their directors.
Reports and assessments normally required	This project requires an Earthworks consent under Proposed Plan Change 8. The original purpose of building the Venice, Paris, and New York precincts was for use as a film studio. However now the precincts will be used for residential accommodation it triggers rules under 14.5 of Proposed Plan Change 8 and requires resource consent as a restricted discretionary activity under rule 14.5.2.1. This was not mentioned in Silverlight Studios application or their subsequent accommodation application.
Iwi and iwi authorities	Te Runanga o Ngāi Tahu (for notified applications only) and Aukaha and Te Ao Marama (consultancies operating on behalf of iwi).
Relationship agreements under the RMA	Nil
Insert responses to other specific requests in the Minister's letter (if applicable)	<b>Are there any reasons that you consider it more appropriate for the project, or part of the Project, to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the FTCA?</b> There is no reason why an application for resource consent made under rule 14.5.2.1 would not be completed within the statutory timeframes.
Other considerations	There are no notable natural hazards identifiable particular to the site coming up in the Otago Regional Council's database. There are relative district seismic risks from the Cardrona-Hawea fault and the Alpine fault.

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<b>Local authority providing comment</b>	Queenstown Lakes District Council
<b>Contact person (if follow-up is required)</b>	Tony Avery
	General Manager – Planning and Development
	s 9(2)(a)

## Comment form

Please use the table below to comment on the application.

<b>Project name</b>	Silverlight Studios - Accommodation project
<b>General comment – potential benefits</b>	As the wider Silverlight Studios project is likely to create both short and long term employment opportunities locally, this proposal may result in benefits for the District given there is a shortage of accommodation options for people who live and work here. The proposal would allow for accommodation to be provided for workers constructing the buildings on site and for people associated with the film studio activity once completed, reducing any strain/pressure on the existing housing stock within the District. The application proposes that when the onsite accommodation is not occupied by cast and crew it may be made available for visitor accommodation as part of the wider tourism activities on the site. However the application states that the accommodation of cast and crew will be the priority. Given that the accommodation is likely to provide short term visitor accommodation, it is likely to provide benefits in regard to both tourism and alleviating the competing demands on existing housing stock elsewhere in the District. However as the proposal is for short visitor accommodation only, it is unlikely to provide a significant benefit for the District in regard to wider housing supply.
<b>General comment – significant issues</b>	<p>The purpose of the Rural Zone is to enable farming activities and provide for other appropriate activities that rely on rural resources while protecting, maintaining and enhancing landscape values, ecosystem services, nature conservation values, the soil and water resource and rural amenity. Development in the zone should therefore maintain landscape values and demonstrate that adverse effects in relation to amenity and on the transport network, including State Highway 6, are avoided or mitigated.</p> <p>The policy framework in the Operative District Plan does not specifically provide for visitor accommodation as a primary activity. The policy framework in the Proposed District Plan provides for the establishment of activities such as small scale visitor accommodation located within farms where these enable landscape values and indigenous biodiversity to be sustained in the longer term. Therefore, this visitor accommodation proposal would not fit with the zone intent and strategic objectives and policies that seek to consolidate urban development if it was considered on its own.</p> <p>The key adverse environmental effects that are likely to be generated from the proposal have been identified by the applicant and are outlined in the application documentation. The activity proposed does have the potential to generate adverse traffic effects on State Highway 6, particularly if being used for visitor accommodation. This however is contingent on peak traffic flows generated by the various activities on the site.</p>

	<p>In a broader sense it is considered that the visitor accommodation is unlikely to result in significant issues over and above those anticipated through the wider Silverlight Studios proposal (if approved) i.e. the accommodation will be a small component of the larger activity, will be ancillary and complimentary to the main activities on the site, and is proposed within buildings already proposed as part of this larger proposal.</p> <p>If the wider Silverlight Studios proposal is not approved, the effects of the visitor accommodation activity would need to be assessed separately. In this scenario, there is potential for the visitor accommodation activity to result in adverse effects on the surrounding environment, particularly in relation to landscape, character, rural amenity and traffic given the scale of the visitor accommodation activity.</p> <p>The newly adopted <a href="#">Queenstown Lakes Spatial Plan</a> looks to consolidate Wanaka growth, using the Cardrona river as a natural boundary. While not a statutory document, it has been developed up with the view to the long term management of growth across the district. The visitor accommodation activity would result in development outside the urban growth boundary and inconsistent with the intent of the Spatial Plan. There is also potential for reverse sensitivity effects in relation to the Wanaka airport given the nature of the visitor accommodation activity (which is a noise sensitive receiver).</p> <p>In conclusion, it is considered that the visitor accommodation activity is unlikely to be supported if not undertaken in conjunction with the wider Silverlight Studios proposal (which has been accepted for fast-track consideration).</p>
<b>Is Fast-track appropriate?</b>	<p>Fast-track for the accommodation project is considered appropriate within the context of the larger Silverlight Studios proposal as it would allow for accommodation to be provided for workers constructing the buildings on site and for people associated with the film studio activity once completed, reducing any strain/pressure on the existing housing stock within the District.</p> <p>With regard to Section 18 of the Act, the project is not a prohibited activity under the Resource Management Act 1991 or the Queenstown Lakes Operative or Proposed District Plans. The activity would not occur on land returned under a Treaty settlement, and would not occur in a customary marine title area or a protected customary rights area.</p>
<b>Environmental compliance history</b>	QLDC has no record of environmental compliance or enforcement matters in relation to the applicant.
<b>Reports and assessments normally required</b>	<ul style="list-style-type: none"> <li>• Landscape visual assessment</li> <li>• Integrated Transport Assessment</li> <li>• Acoustic assessment</li> <li>• Water supply and wastewater – information on any water requirements from the QLDC owned bore / requirements from the Corbridge Water Supply Scheme</li> <li>• Lighting assessment</li> </ul>
<b>Iwi and iwi authorities</b>	<p>Aukaha</p> <p>Te Runanga o Moeraki</p> <p>Kati Huirapa Runanga ki Puketeraki</p> <p>Te Runanga o Otakou</p> <p>Te Ao Marama Inc</p> <p>Ngai Tahu Group Management</p>
<b>Relationship agreements under the RMA</b>	N/A
<b>Insert responses to other specific requests in the Minister's letter (if applicable)</b>	<p><b>1. Are there any reasons that you consider it more appropriate for the Project, or part of the Project, to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the FTCA?</b></p>

	<p>No. As outlined above, this is considered appropriate under the fast-track consenting process within the context of the larger Silverlight Studios proposal as it would allow for accommodation to be provided for workers constructing the buildings on site and for people associated with the activity once completed, reducing any strain/pressure on the existing housing stock within the District. Given that the Silverlight Studios proposal has been accepted for fast-track consideration, should this visitor accommodation proposal be subject to a Resource Management Act process, it is likely to be complex, given the potential adverse effects on the surrounding environment, particularly in relation to landscape, character, rural amenity and traffic given the scale of the visitor accommodation activity. In addition, given the nature of the visitor accommodation proposal (being a component of the larger Silverlight Studios activity, ancillary and complimentary to the main activities on the site, and within buildings already proposed as part of this larger proposal), it would make it difficult to ensure that an integrated decision is made on the overall proposal of a film studio and associated accommodation proposal.</p> <p><b>2. Does the Council have any comments on the proposed residential or visitor accommodation activities on this site?</b></p> <p>The proposal would allow for accommodation to be provided for workers constructing the buildings on site and for people associated with the film studio activity once completed, reducing any strain/pressure on the existing housing stock within the District. As currently proposed, it would reduce any additional strain/pressure created by the Silverlight Studios on the existing housing stock within the District, but would not benefit the District more widely in terms of housing supply.</p> <p><b>3. What reports and assessments would normally be required by the Council for a project of this nature in this area?</b></p> <p>Landscape, Acoustic (including reverse sensitivity and the Airport), Engineering, Traffic, Planning</p> <p><b>4. Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your district?</b></p> <p>QLDC has no record of environmental compliance or enforcement matters in relation to the applicant.</p>
<b>Other considerations</b>	<p>The activity proposed has the potential to generate adverse traffic effects on State Highway 6. With this in mind, it may be appropriate to seek comment from Waka Kotahi NZ Transport Agency.</p> <p>However as highlighted in the comments above, the visitor accommodation is unlikely to result in significant issues over and above those anticipated through the wider Silverlight Studios proposal (if approved).</p>

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# Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

*This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.*

Organisation providing comment	Waka Kotahi NZ Transport Agency
Contact person (if follow-up is required)	Richard Shaw Team Lead (South) – Poutiaki Taiao / Environmental Planning Email: s 9(2)(a) s 9(2)(a) Click or tap here to enter text.

## Comment form

Please use the table below to comment on the application.

Project name	Silverlight Studios Accommodation Project
General comment	<p>Waka Kotahi NZ Transport Agency (Waka Kotahi) consider themselves to be a key stakeholder to the accommodation aspect of the Silverlight Film Studios Project, as well as for the overall project, given the potential for significant adverse effects on State Highway 6 (SH6).</p> <p>Waka Kotahi have been in discussions with Silverlight Film Studio on their project proposal for a while. Initially this has been focused on the wider film studio and visitor attraction proposal (Silverlight Studios project), and the details of the transportation assessment that would be required to support the application. Waka Kotahi supported the wider proposal being referred to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (FTCA). The Silverlight Studio project was referred by the Minister in December 2020 and the consent lodged with the EPA on 21 July 2021. We have also had discussions with the developer on the proposal to amend the scope of the referred project to include approximately 300 staff accommodation units. The proposal discussed previously has been amended in the current referral application by including the provision that the staff accommodation can also be used as visitor accommodation when not required for studio use.</p> <p>Waka Kotahi <b>supports</b> the Silverlight Studios Accommodation project being referred to the expert consenting panel under the FTCA. This is on the basis that it would appear to align with matters of relevance to the Minister's decision set out in section 19 of the FTCA, particularly in relation to the potential for economic benefits and employment generation, as well as increased housing supply. Referral of the accommodation aspect of the proposal along with the wider application will allow for a more integrated, detailed consideration of all of the activities proposed for the wider site, rather than separating out aspects of the proposal for discrete assessment.</p>



	<p>While we support the application in general, the addition of the provision for staff accommodation units to be utilised for visitor accommodation, when not required for studio use, raises potential issues that need to be considered. Our comments on the proposal are as follows:</p> <ul style="list-style-type: none"> <li>• The usage of the staff accommodation for visitors was not part of the original discussion between the applicant and Waka Kotahi, and therefore was not considered in the assessment of the potential transport impacts previously discussed. It is unclear from the referral application how often and what proportion of the site is likely to be available for visitor accommodation and therefore the potential transport impacts of that alternative use.</li> <li>• If approved, depending on the nature and scale of the use of the staff accommodation by visitors, the character of the site may change from a large-scale special employment style activity to potentially more of a mixed urban area in the rural zone. This would be located outside the Wanaka Urban Growth Boundary and inconsistent with the outcomes anticipated in Queenstown Lakes' recently adopted Spatial Plan. If this did occur, it could be viewed as encouraging a poor planning outcome through ribbon type development along SH6, as well as urban sprawl from Wanaka east towards Luggate. The change from a rural to more of an urban environment could potentially create a precedent for other visitor/tourist style accommodation or urban type development wanting to establish in the area.</li> <li>• If the site is used for visitor accommodation it would potentially become a more car centric development, with tourists likely to use their vehicles more often when compared with staff staying on site and using public or shared transport to and from the site. This would support the reduction of vehicle emissions as outlined in the Government Policy Statement 2021.</li> <li>• As part of the larger project Waka Kotahi is encouraging the applicant to consider public transport for their staff and tourist customers. We are also encouraging the integration of the site with active travel networks such as shared pathways for pedestrians and cyclists from Wanaka/ Mt Iron in collaboration with other groups in the area considering developing shared paths.</li> </ul>
<b>Other considerations</b>	Click or tap here to provide any information you consider relevant to the Minister's decision on whether to refer the project to an expert consenting panel.
<b>[Insert specific requests for comment]</b>	Waka Kotahi appreciate the opportunity to comment on the referral application for the Silverlight Studios Accommodation proposal under the FTCA. While we support the referral, at this stage it is unclear how much the project would contribute to a well-functioning urban environment given the concerns raised in our comments above. If the project is successfully referred to a panel, Waka Kotahi requests that the applicant consults with us to confirm the details of the transport impact assessment required to determine appropriate mitigation measures for potential transport impacts.

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