SOUTHERN LINK PROPERTY LIMITED

SOUTHERN LINK INLAND PORT

Substantive Application Report

17 April 2026

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A. APPLICATION COVER LETTER TO THE ENVIRONMENTAL PROTECTION AUTHORITY

17 April 2026

Environment Protection Authority

Private Bag 63002

Wellington 6140

New Zealand

RE: Fast-Track Approvals Act 2024 – Southern Link Property Limited – Substantive Application for the Southern Link Inland Port (FTAA-2505-1059)

Please find attached a substantive application from Southern Link Property Limited, the authorised person specified in the Minister's decision to refer the project issued under Section 27 of the Fast-Track Approvals Act, for the Southern Link Inland Port.

Southern Link Property Limited seeks approvals for land use consents, water permits, and discharge permits that would otherwise be applied for under the Resource Management Act 1991 to authorise the construction, use and operation of the Southern Link Inland Port on a site located in Mosgiel.

Southern Link Property Limited has authorised its agent, Mitchell Daysh Limited, to upload the application documentation to the Fast-Track Portal. The complete application package includes:

- Part A – Substantive Application Documents;
- Part B – Technical Reports;
- Part C – Proposed Conditions;
- Part D – Management Plans;
- Part E – Plans and Visual Simulations;
- Part F – Consultation and Engagement Documents;

- Part G – Rules Assessment;
- Part H – Landowner Ownership and Records of Title Documents; and
- Part I – Existing Approvals.

Of note, a number of the documents that form the application package are being provided in both non-redacted and redacted form. It is requested that only the redacted versions are published publicly on the Fast-Track website.

The lodgement of this application is a relodgement of the application that was previously made on 16 March 2026 and withdrawn on 14 April 2026. The application has been amended since the previous lodgement to align the project description with that provided in the Referral Application Notice of Decision following the issue of scope raised by the Environment Protection Authority previously. This has included:

- The replacement of three warehouses in Stage 3 of the project (reducing the warehousing m^2 to approximately 80,000m^2) with break bulk hardstand areas;
- The establishment of an acoustic wall / barrier adjacent to the break bulk hardstand areas along the eastern site boundary to manage the effects of the removal of the three warehouses;
- Removal of works associated with the Southern Link Inland Port that will occur within the adjacent KiwiRail corridor. Instead, activities within the KiwiRail corridor will be applied for concurrently to the Substantive Application as part of a separate application under the Resource Management Act;
- Updating of master plans and staging plans to reflect the matters identified above; and
- Inclusion of addition details of consultation and engagement which has occurred.

To facilitate these changes, the Substantive Application Report and all supporting technical reports have been updated. For ease of locating the changes, Table 1 provided in **Appendix A** to this letter identifies the location of the changes within the application documents, as well as providing a brief summary of what the changes relate to.

Other than the changes outlined above, the content of the application remains as it was when lodged on 16 March 2026. As such, it is requested that as the section 46 assessment is completed for the relodged application, both the EPA and the administering agencies focus on those changes identified Table 1 to ensure a timely and cost-efficient process proportionate to the functions being performed.

Southern Link Property Limited are available to assist the Environmental Protection Authority in navigating any aspects of the Southern Link Inland Port and this substantive application.

Southern Link Property Limited looks forward to working with Environmental Protection Authority to progress the application for the Southern Link Inland Port.

Yours sincerely



Kevin Kearney

Strategic Projects Manager

[redacted]

Appendix A: Table 1 – Location and Brief Summary of Updates Made to Application Documents

Document	Changes Made	Content of Change
Substantive Application Report		
A.02A – Part C – Payment Confirmation	Evidence of payment confirmation has been removed from the Substantive Application Report (previously provided in Part C). Due to the timing of the issuing of the invoice for the application fee and levy, at the time of lodgement payment has been made but confirmation has not been received.	
A.02A – Section 1 – Introduction	Section 1.1 Background	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor. > Project description summary updated to align with project description summary in the referral application.
	Section 1.2 Purpose of the Fast-track Approvals Act 2024	> Updated economic benefit figures and job creation numbers to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas. > Clarification that the reduction in heavy vehicle movements and initial reduction in carbon are associated with Stage 1 of the project.
	Section 1.7 Land Ownership	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	Section 1.8 Application Structure	> 'Table 1-3: Technical Reports Prepared by Technical Specialists on the Project' updated to reflect new issue dates.
	Section 1.9 Works within the KiwiRail Corridor	> New section providing clarification of the works that will occur within the KiwiRail Corridor, and that the application does not seek to obtain approvals for those activities.
A.02A – Section 2 – Project Description	2.1 Introduction to the Project	> Project description summary updated to align with project description summary in the referral application. > 'Figure 2-1: Proposed Site Plan and Layout' updated to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	2.2 Economic Benefits	> Updated construction job numbers, value added figures, and net additional high-value permanent jobs to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.

	2.4 Development Staging and Timing	> 'Figure 2-2: Proposed Staging of Site Development' updated to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas. > Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor. > Amended to reflect the replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas. > 'Figure 2-5: SLIP Master Plan Stage 3' updated to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas, and establishment of an acoustic barrier adjacent to the break bulk hardstand areas along the eastern site boundary.
	Section 2.7 Site Clearance and Earthworks	> 'Table 2-1: Proposed Earthworks Areas and Volumes and Staging' updated to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	Section 2.7.3 Stage 1 Clearance and Earthworks	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	Section 2.9 Internal Roading and Parking	> Amended to reflect the replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	Section 2.10 Rail Siding	> 'Figure 2-7: Concept Plan Showing Location and Context of the Rail Siding' and associated text amended to reflect that an aerial figure showing the removal of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas was not available. Instead, a snip of the concept plan for the SLIP has been used to illustrate the rail-siding features.
	Section 2.16 Warehouse Areas	> Amended to reflect the reduction of the number of warehouses in Stage 3.
	Section 2.16.3 Stage 3 Warehousing	> Amended to reflect the reduction of the number of warehouses in Stage 3.
	Section 2.17 Break Bulk Hardstand Areas	> New section detailing the proposed break bulk hardstand areas.

	Section 2.19 Noise Attenuation	> Amended to reflect the establishment of an acoustic barrier adjacent to the break bulk hardstand areas along the eastern site boundary.
	Section 2.20 Onsite Stormwater Management	> 'Figure 2-11: Proposed Stormwater Layout' updated to reflect the replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	Section 2.20.1 Flood Mitigation	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	Section 2.22 Wastewater	> 'Figure 2-12: Proposed Wastewater Layout' updated to reflect the replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	Section 2.23 Water	> 'Figure 2-13: Proposed Potable and Non-Potable Water Supply Network Layout' updated to reflect the replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	Section 2.26 Landscaping	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
A.02A – Section 3 – Existing Environment	Section 3.2 Site Location and General Characteristics	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor. > 'Table 3-1: Land Ownership for the SLIP' updated to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	Section 3.5.1 Adjacent Landowners and Occupiers	> 'Figure 3-9: Map of Adjacent Land' updated to include the KiwiRail Corridor as an adjacent land parcel. > 'Table 3-3: Adjacent Landowners' amended to include the KiwiRail Corridor as an adjacent land parcel.
	Section 3.6.1.2 Site Overlays and Controls	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
A.02A – Section 4 – Approvals Sought	Section 4.1 Overview	> Amended to reflect that approvals for the activities within the KiwiRail Corridor will be obtained outside the Fast-track process.
	Section 4.2.1 Relationship with Other Consents	> Amended to reflect that approvals for the activities within the KiwiRail Corridor will be obtained outside the Fast-track process.

A.02A – Section 5 – Consultation and Engagement	Section 5.3.5 Neighbouring Properties	> New section added to provide details of initial consultation and engagement that has occurred with neighbouring properties to the SLIP.
	Table 5-1: Consultation Timeline and Summary of Feedback Received	> Amended to include details of initial consultation and engagement that has occurred with neighbouring properties to the SLIP.
A.02A – Section 6 – Assessment of Environmental Effects	Section 6.3.1.1 Construction Benefits	> Updated value added and employment figures to reflect the replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	Section 6.3.1.2 Long Term Employment Opportunities	> Updated employment figures to reflect the replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	Section 6.3.4 Summary of Inland Port Benefits	> Updated value added and employment figures to reflect the replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	Section 6.8.1 Landscape Effects	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	Section 6.8.2.1 Public Viewpoints	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
A.02A – Section 8 – Fast-track Approvals Act 2024 Requirements	Section 8.6 The Project Meets the Purpose of the Act	> Updated value added and employment figures to reflect the replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas. > Updated capital investment and employment figures to reflect the replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
A.02A – Section 10 - Conclusion	Section 10.1	> Updated value added and employment figures to reflect the replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
Technical Reports		
B.01 – Land Assessment	Site Description	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.

	Avoidance / Mitigation of Reverse Sensitivity – Noise	> Amended to reflect that an acoustic barrier will be established adjacent to break bulk hardstand areas.
B.02 – Aviation Impact Report	2. Background	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	3.3. Proposed Inland Port	> 'Figure 5 – Southern Link Inland Port concept plan' updated to reflect removal of 3 x Stage 3 warehouses. > 'Figure 6 – SLIP site plan' updated to reflect removal of 3 x Stage 3 warehouses. > List of site infrastructure updated to align with project description summary in the referral application.
B.03 – Terrestrial Ecological Impact Assessment	1.1 Overview	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	1.2 Description of the Activity	> 'Figure 2: Southern Link Inland Port – Site Layout' updated to reflect removal of 3 x Stage 3 warehouses.
B.04 – Freshwater Ecological Impact Assessment	2.1 Description of Activity	> Amended to reflect to reflect the replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas. > 'Figure 2: Southern Link Inland Port Masterplan Design' updated to reflect removal of 3 x Stage 3 warehouses.
B.05 – DSI	2.1 Site Identification	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	2.10 Proposed Future Use	> 'Figure 6: Concept plan of the proposed development' updated to reflect removal of 3 x Stage 3 warehouses. > List of site infrastructure updated to align with project description summary in the referral application. > Amended to reflect that break bulk hardstand areas are to be established in the place of 3 x previously proposed warehouses.
B.06 – Noise Assessment	4.2 The development will progress in stages	> 'Figure 1: Staging plan' updated to reflect removal of 3 x Stage 3 warehouses.

	4.4.1 Noise mitigation is included in all Stages	> 'Figure 5: Noise mitigation design – Stage 3' updated to reflect removal of 3 x Stage 3 warehouses.
	4.4.2 Noise barriers reduce noise emission from the Site	> Amended to reflect that an acoustic barrier will be established adjacent to break bulk hardstand areas.
	9.2 We have modelled two stages of the proposed development	> 'Table 7: Activity scenarios – Stage 1 and Stage 3' updated to include activities associated with the break bulk hardstand areas (i.e. trucks and electric forklifts).
	9.3 Predicted noise levels comply with the 2GP limits at all noise sensitive receivers	> 'Table 8: Predicted noise levels comply with the 2GP limits at all noise sensitive receivers' updated to include additional addresses as a result of the break bulk hardstand areas (243 Puddle Alley and 261 Puddle Alley). > 'Table 9: Predicted noise levels – Stage 3' updated to include additional addresses as a result of the break bulk hardstand areas (243 Puddle Alley and 261 Puddle Alley), and to reflect amendments to predicated noise levels for other addresses associated with the break bulk hardstand areas.
	Appendix H Noise Contour Plots	> 'Final Stage Daytime Operation' updated to reflect removal of 3 x Stage 3 warehouses. > 'Final Stage Night-time Operation' updated to reflect removal of 3 x Stage 3 warehouses.
B.07 – Landscape and Natural Character Effects & Visual	Site and area description	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	The proposed development, including integrated landscape mitigation measures	> Project description summary updated to align with project description summary in the referral application. > Amended to reflect the replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	Boundary plantings	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor, but acknowledgement that planting in the KiwiRail Corridor is planned to be established during Stage 1.

	Visual effects	> Stedman Road / Railway - Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor. > Puddle Alley – Amended to reflect that 3 x Stage 3 warehouses are no longer proposed.
	Appendix B: Boundary Screen Plantings Plant list and establishment guidelines	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	Figures	> 'Figure 11: Proposed Southern Link Inland Port – Masterplan' updated to reflect removal of 3 x Stage 3 warehouses. > 'Figure 12: proposed Southern Link Inland Port – Landscape Concept Plan; - updated to reflect removal of 3 x Stage 3 warehouses.
B.08 – Lighting	Section 2: Project Description	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor. > Project description summary updated to align with project description summary in the referral application. > Amended to reflect that break bulk hardstand areas are proposed.
	Figures	> 'Preliminary Lighting Layout Plan' updated to reflect removal of 3 x Stage 3 warehouses. > 'Appendix C: Master Plans' updated to reflect removal of 3 x Stage 3 warehouses. > 'Staging – Master Plan' updated to reflect removal of 3 x Stage 3 warehouses. > 'Master Plan Stage 3' updated to reflect removal of 3 x Stage 3 warehouses.
B.09 – Economic	Executive Summary	> Updated estimated GDP contribution costs to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas. > Updated estimated employment and FTE figures to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	Section 7.2: The Facility	> Updated Figure 6.2 to reflect the removal of the 3 x Stage 3 warehouses.

		> Updated the floor area of the warehousing to reflect the removal of the 3 x Stage 3 warehouses. > Updated the description of the proposed development to align with the project description in the referral application.
	Section 7.3: Medium Term Construction Impacts	> Updated Figure 6.3 to reflect the removal of the 3 x Stage 3 warehouses. > Updated estimated GDP contribution costs, figures, and economic contribution figures to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas. > Updated estimated employment and FTE figures to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	Section 7.4: Long Term Employment Impacts	> Updated estimated employment and FTE figures to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	Section 10: Key Findings and Conclusions	> Updated short-medium term construction impacts to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas. > Updated estimated FTE and net additional new job figures to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
	Section 10.3: Overall Conclusions	> Updated estimated GDP contribution costs to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas. > Updated estimated employment and FTE figures to reflect replacement of 3 x Stage 3 warehouses with 3 x break bulk hardstand areas.
B.10 – Geotechnical	Section 1.4: Project Overview	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor. > Project description summary updated to align with project description summary in the referral application. > Amended to reflect that break bulk hardstand areas are to be established.
B.11 – Groundwater	1.4 Project Overview	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor. > Project description summary updated to align with project description summary in the referral application.

		> Amended to reflect that break bulk hardstand areas are to be established.
	Appendix B – Earthworks Diagrams	> Figures 09001 and 09002 amended to reflect removal of 3 x Stage 3 warehouses.
B.12 – ITA	Section 7.1 Overview	> 'Figure 7-1: Proposed Staging for development of the Inland Port' updated to reflect removal of 3 x Stage 3 warehouses. > Tabel 7-1 updated to align ground floor area and staff numbers with updated economic assessment.
	Appendix C Dukes Road North Intersection Design	> Figure 070011 amended to reflect removal of 3 x Stage 3 warehouses and replacement with 3 x Stage 3 break bulk hardstand areas.
B.13 – Stormwater	Cover	> Updated image.
	Executive Summary	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	1.3 Project Description	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor. > Project description summary updated to align with project description summary in the referral application. > Amended to reflect that break bulk hardstand areas will be established. > 'Figure 1-2: Master Plan' amended to reflect removal of 3 x Stage 3 warehouses.
	1.5 Servicing Strategy	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	2.1.2 Proposed Flood Management Strategy	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	Appendix D Drawings	> Figures 000151, 000152, 000163, 70001, 70011, 70015, 70017, 20001, 20005, 20007, 40001, 60001, 90001, 90002, 511004, and 511005 amended to replace Warehouse 3A, 3B, and 3C with hardstand areas 3A, 3B, and 3C.

B.14 – Wastewater	Section 3: Project Description	> Project description summary updated to align with project description summary in the referral application. > Amended to reflect that break bulk hardstand areas are to be established. > 'Figure 3-1: Proposed Staging for development of the Inland Port' updated to reflect removal of 3 x Stage 3 warehouses.
	8.1.1 Site Occupancy (people) Wastewater Generation	> Updated FTE to align with economic assessment and to acknowledge that a factor of safety has been utilised in calculations.
B.15 – Non-Potable and Potable Water	Section 3: Project Description	> Project description summary updated to align with project description summary in the referral application. > Amended to reflect that an acoustic barrier will be established adjacent to break bulk hardstand areas. > 'Figure 3-1: Proposed SLIP Site Plan and Layout' updated to reflect removal of 3 x Stage 3 warehouses.
	5 SLIP Water Supply Schemes	> 'Figure 5-1: Southern Link Inland Port – Proposed potable and non-potable water schematics' updated to reflect removal of 3 x Stage 3 warehouses.
	7.1 Potable Water Demand	> Updated FTE to align with economic assessment and to acknowledge that a factor of safety has been utilised in calculations.
	A.1 DCC Pre Application Advice	> Additional correspondence that has occurred with DCC added.
B.16 – Civil	Cover	> Updated image.
	2.5 Development Size	> Project description summary updated to align with project description summary in the referral application.
	2.5.1 Staging of Works	> Amended to reflect that break bulk hardstand areas are to be established.
	4.3.1.3 Truck Roads / Heavy Vehicle Roads	> Amended to reflect removal of 3 x Stage 3 warehouses and replacement with 3 x Stage 3 break bulk hardstand areas.
	5.2 Subgrade Surface	> Hardstand subgrades added to reflect establishment of 3 x Stage 3 break bulk hardstand areas.

	5.3 Earthworks Volumes	> 'Table 6: Earthworks – Cut / Fill Report' minor amendments made to reflect removal of 3 x Stage 3 warehouses and replacement with 3 x Stage 3 break bulk hardstand areas.
	Appendix A Developed Concept Design Drawings	> Figures 000151, 000152, 000163, 70001, 70011, 70015, 70017, 20001, 20005, 20007, 40001, 60001, 90001, 90002, 511004, and 511005 amended to replace Warehouse 3A, 3B, and 3C with hardstand areas 3A, 3B, and 3C.
	Appendix B Integrated Transport Assessment	> Amended to be updated version of ITA.
	Appendix C Williams Architects, Master Plan	> Amended to reflect removal of 3 x Stage 3 warehouses and replacement with 3 x Stage 3 break bulk hardstand areas.
Conditions		
C.01 – DCC Conditions	Condition 4	> Updated to provide for the Construction Management Plan to be prepared in conjunction with any Construction Management Plan required by other consents for the Southern Link Inland Port (to provide for ease of implementation).
	Conditions 35, 41, 46, 48, 51, 52, 70, 71, 78, 94, 95, 96	> Updated to reflect new issue dates of technical reports.
	Appendic B – Aviation Open Space Area	> Plan updated to reflect removal of 3 x Stage 3 warehouses and replacement with 3 x Stage 3 break bulk hardstand areas.
C.02 – ORC Conditions	Condition 5	> Advice Note added to the plan certification condition to align with provisions on the DCC condition set, including providing for the Construction Management Plan to be prepared in conjunction with any Construction Management Plan required by other consents for the Southern Link Inland Port (to provide for ease of implementation).
	Conditions 16, 25, 29, A.7, B.8, C.4, D.5, D.8, E.2, E.4	> Updated to reflect new issue dates of technical reports.
Draft Management Plans		

D.01 – Draft Construction Management Plan	Cover	> Updated image.
	3. Project Description	> Project description summary updated to align with project description summary in the referral application. > Amended to reflect that break bulk hardstand areas are to be established.
	3.1 Location of Works	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	6.2.3 Stage 3 Construction	> Amended to reflect removal of 3 x Stage 3 warehouses and replacement with 3 x Stage 3 break bulk hardstand areas. > Amended to reflect that an acoustic barrier / wall will be established adjacent to break bulk hardstand areas.
	7.3.3 Warehouse 3D Construction	> Amended to reflect removal of 3 x Stage 3 warehouses.
	11.1 Construction Duration	> Amended to reflect that an acoustic barrier / wall will be established adjacent to break bulk hardstand areas.
	Appendix A – Development Masterplan	> 'Master Plan – Concept' updated to reflect removal of 3 x Stage 3 warehouses and replacement with 3 x Stage 3 break bulk hardstand areas.
	Appendix B – Draft Contaminated Site Management Plan and Draft Remedial Action Plan	> Updated versions provided by EC Otago [see entry for D.03 – Draft Remedial Action Plan].
D.03 – Draft Remedial Action Plan	1.2 Site Description	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
	1.3 Proposed Development	> Project description summary updated to align with project description summary in the referral application. > Amended to reflect that break bulk hardstand areas are to be established. > 'Figure 3: Concept plan of the proposed development' updated to reflect removal of 3 x Stage 3 warehouses. > 'Figure 4: Proposed stages of the development' updated to reflect removal of 3 x Stage 3 warehouses.

		> 'Figure 9: The proposed development plan overlain with the three areas which require remediation' updated to reflect removal of 3 x Stage 3 warehouses.
Plans and Visual Simulations		
E.01 – Master Plans	Amended to reflect removal of 3 x Stage 3 warehouses, provision of 3 x Break Bulk Hardstand Areas, and establishment of an acoustic wall / barrier adjacent to the 3 x Break Bulk Hardstand areas in Stage 3.	
E.02 – Developed Civil Concept Design	Figures 000151, 000152, 000163, 70001, 70011, 70015, 70017, 20001, 20005, 20007, 40001, 60001, 90001, 90002, 511004, and 511005 amended to replace Warehouse 3A, 3B, and 3C with hardstand areas 3A, 3B, and 3C.	
E.03 – Concept Visual Simulations	Amended to reflect removal of 3 x Stage 3 warehouses, provision of 3 x Break Bulk Hardstand Areas, and establishment of an acoustic wall / barrier adjacent to the 3 x Break Bulk Hardstand areas in Stage 3.	
Rules Assessment		
G.01 – Rule Assessment	Rule 16.6.10.2 Comment	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.
Land Ownership and Records of Title		
H.01 – Records of Title Landowner Table	Table 1, Figure 1, Table 2	> Amended to reflect that the application does not seek to obtain approvals for activities within the KiwiRail Corridor.

B. NOTICE OF DECISIONS LETTER

Fast-track

Te Kāwanatanga o Aotearoa
New Zealand Government

File ref: BRF-6639 / FTAA-2505-1059

26 August 2025

To: Kevin Kearney (Port Otago Limited)
Southern Link Property Limited
Email: s 9(2)(a)

CC: Polly Smith
Mitchell Daysh Limited
Email: s 9(2)(a)

Dear Kevin

Notice of Decisions on an application for referral of the Southern Link Inland Port project under the Fast-track Approvals Act 2024

This notice of decisions is for an application received from Southern Link Property Limited (the applicant) for referral of the Southern Link Inland Port project (the project) under the Fast-track Approvals Act 2024 (the Act) that has been accepted by the Minister for Infrastructure (the Minister) under section 21 and referred under section 26.

The project is described as being to establish and operate an inland port / logistics hub to service Port Otago at 270-292 Dukes Road North, North Taieri (legally described as Part Section 9 Block V East Taieri Survey District, Part Section 10 Block V East Taieri Survey District, & Deposited Plan 5579 East Taieri Survey District).

The project comprises:

a. a rail siding to enable a rail freight shuttle service to Port Chalmers and the wider rail network
b. up to 80,000 m^2 of high stud warehousing (chilled and ambient)
c. a truck canopy and unloading area
d. a 5-hectare container depot facility
e. up to 5 hectares of container terminal for storage of full containers including up to 1,500 refrigerated container charging ports

f. break bulk storage facilities
g. road widening and upgrades to the Dukes Road rail crossing; and
h. ancillary activities to support the above, including earthworks, construction of the rail siding, site access, internal roadways and parking, hardstand areas, landscaping, buildings for storage, administration and maintenance facilities, and associated infrastructure and works including measures necessary to manage stormwater and stabilise the site.

The project is intended to be delivered in three construction stages, with initial infrastructure and facilities built within 12-18 months post-approval, expanded container storage and warehousing added within 2-5 years, and further development occurring over 5-10+ years as demand grows. The applicant intends to lodge one substantive application for all stages of the project.

The project will require the proposed approvals under a specified Act:

a. resource consents under the Resource Management Act 1991 (RMA).

The project can only be accepted if the Minister is satisfied the criteria in section 22 is met, which includes being satisfied the project is an infrastructure or development project that would have significant regional or national benefits and referring the project to the fast-track approvals process would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes and is unlikely to materially affect the efficient operation of the fast-track approvals process.

Decision on referral application

The Minister has decided to accept the referral application for the whole project as he is satisfied it meets the criteria in section 22 (s 21(1)(c)) and to refer the project to the fast-track approvals process under section 26(2)(a).

Reasons for accepting referral application

The Minister is satisfied the project:

a. is an infrastructure or development project that would have significant regional or national benefits; and
b. referring the project to the fast-track approvals process –
    i. would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and
    ii. is unlikely to materially affect the efficient operation of the fast-track approvals process.

The Minister is satisfied the project is an infrastructure or development project that would have significant regional or national benefits as it:

a. is an infrastructure project that would have significant regional benefits because it:
   - has been identified as a priority project in a local government strategy, specifically the Future Development Strategy for Dunedin 2024-2054 jointly prepared by DCC and ORC [section 22(2)(a)(i)]
   - will deliver new regionally significant infrastructure by addressing critical capacity constraints at Port Otago, and it has secured $8.2 million in funding from the Regional Infrastructure Fund [section 22(2)(a)(ii)]
   - will deliver significant economic benefits in the Otago region, including regional investment of up to $100 million (86 per cent within Otago), the creation of over 550 FTE construction jobs and 55 ongoing roles, improved freight efficiency and logistics, reduced road maintenance costs, strengthened supply chain resilience, and enhanced productivity for KiwiRail and Port Otago [section 22(2)(a)(iv)]
   - will support the Otago region's primary industries by improving logistics for agriculture and forestry goods [section 22(2)(a)(v)]
   - will support the reduction of greenhouse gas emissions by enabling a significant shift of freight from road to rail [section 22(2)(a)(vii)]
   - will provide infrastructure that could support recovery from natural hazards and climate-related events [section 22(2)(a)(viii)]
   - will address significant environmental issues, specifically climate change, through its contributions to emissions reduction and climate resilience [section 22(2)(a)(ix)]
   - is consistent with local or regional planning documents, including spatial strategies, specifically Dunedin City Council's Future Development Strategy 2024-2054 [section 22(2)(a)(x)].

The Minister is satisfied that referring the project to the fast-track approvals process:

b. would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes because:
   - the project area's rural zoning and classification as highly productive land would likely require a plan change to progress the project under standard RMA processes, which is typically a detailed and resource-intensive process
   - the time frames under the Act are significantly shorter than under the RMA
   - the Act precludes public and limited notification
   - appeals under the Act are only to the High Court rather than the Environment Court and are limited to points of law.

c. is unlikely to materially affect the efficient operation of the fast-track approvals process because the project is neither novel in the New Zealand context nor beyond the scope of what a panel would typically assess under the RMA.

The Minister is satisfied that there is no reason he must decline the project under section 21(3).

Specified matters for accepted referral application

The following person who lodged the referral application is the person authorised to lodge a substantive application for the project under section 27(2): Southern Link Property Limited.

The Minister has not set a specific deadline for lodging the substantive application under section 27(3)(b)(i). However, in accordance with section 28(3)(d)(ii), the application must be lodged no later than 26 August 2027, which is two years from the date of this notice of decisions.

The persons or groups from whom a panel must invite comments from in addition to any specified in section 53 (s27(3)(b)(iii): the Chief Executive of NZ Transport Agency Waka Kotahi.

If you have any queries about this notice of decisions letter, please email referral@fasttrack.govt.nz and include the name of the Application Lead – Ashiley Sycamore.

If you have any queries about the substantive process, please email contact@fasttrack.govt.nz, or phone 0800 FASTRK (0800 225 537).

Yours sincerely



Ilana Miller
General Manager, Delivery and Operations

cc: Written notice for all projects under section 28(1):

anyone invited to comment on the referral application under section 17:

- relevant local authorities – Dunedin City Council and Otago Regional Council
- Minister for the Environment

- relevant portfolio Ministers – Minister of Climate Change, Associate Minister of Transport, Minister for Rail, Minister for the South Island
- relevant administering agencies – Ministry for the Environment
- Māori groups identified in the list provided to the Minister – Te Runanga o Ngai Tahu, Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Te Rūnanga o Awarua, Hokonui Rūnanga, Waihōpai Rūnaka, Te Rūnanga o Ōraka-Aparima, Te Ao Mārama Incorporated, Aukaha
- any other person – Chief Executive of NZ Transport Agency Waka Kotahi, Chief Executive of KiwiRail, Chief Executive of Port Otago Limited, Minister for Regional Development, Minister for Economic Growth.

cc: Written notice where the Minister accepts the application and refers the project (s28(2)):

- the Panel Convener (including all the related information received by the Minister)
- the EPA (including all the related information received by the Minister)

C. LIST OF LODGED DOCUMENTS

LIST OF LODGED DOCUMENTS

Part A – Substantive Application

A.00 Cover and List of Documents

A.01 Application Form

A.02A NON-REDACTED Substantive Application

A	Application Cover Letter to the Environmental Protection Authority
B	Notice of Decisions Letter
C	List of Lodged Documents
D	List of Acronyms and Glossary of Terms
Section 1	Introduction
Section 2	Project Description
Section 3	Existing Environment
Section 4	Approvals Sought under the Fast-Track Approvals Act
Section 5	Consultation and Engagement
Section 6	Assessment of Environmental Effects
Section 7	Management and Monitoring of Environmental Effects
Section 8	Fast-track Approvals Act 2024 Requirements
Section 9	Approvals Relating to the Resource Management Act 1991
Section 10	Conclusion

A.02B REDACTED Substantive Application *(with same content as set out above)*

Part B – Technical Reports

B.00 Cover and List of Documents

B.01 AbacusBio - Land Assessment (AbacusBio, 2026)

B.02A NON-REDACTED Astral Limited - Aviation Impact Report for Southern Links Property Limited (Astral, 2026)

B.02B REDACTED Astral Limited - Aviation Impact Report for Southern Links Property Limited (Astral, 2026)

B.03 E3 Scientific Limited - Terrestrial Ecological Impact Assessment (e3 Scientific, 2026a)

B.04 E3 Scientific Limited - Freshwater Ecological Impact Assessment (e3 Scientific, 2026b)

B.05 Environmental Consultants Otago Limited - Detailed Site Investigation (EC Otago, 2026)

B.06 Marshall Day Acoustics Limited - Noise Assessment (Marshall Day Acoustics, 2026)

B.07 Mike Moore Landscape Architect - Landscape and Natural Character Effects Assessment (Mike Moore, 2026)

B.08 Pedersen Read - Assessment of Environmental Effects - Lighting (Pedersen Read, 2026)

B.09A NON-REDACTED Savvy Consulting Limited - Economic Assessment (Savvy Consulting, 2026)

B.09B REDACTED Savvy Consulting Limited - Economic Assessment (Savvy Consulting, 2026)

B.10 Stantec New Zealand - Geotechnical Desktop Study and Appraisal (Stantec, 2026a)

B.11 Stantec New Zealand - Groundwater Assessment (Stantec, 2026b)

B.12 Stantec New Zealand - Integrated Transport Assessment (Stantec, 2026c)

B.13 Stantec New Zealand - Stormwater Assessment (Stantec, 2026d)

B.14 Stantec New Zealand - Wastewater Assessment (Stantec, 2026e)

B.15 Stantec New Zealand - Non-Potable and Potable Water Assessment (Stantec, 2026f)

B.16 Stantec New Zealand - Civil Works and Earthworks (Stantec, 2026g)

Part C – Conditions

C.00 Cover and List of Documents

C.01 Proposed Conditions - Dunedin City Council

C.02 Proposed Conditions – Otago Regional Council

Part D – Management Plans

D.00 Cover and List of Documents

D.01 Draft Construction Management Plan

D.02 Draft Contaminated Site Management Plan

D.03 Draft Remedial Action Plan

Part E – Plans and Visual Simulations

E.00 Cover and List of Documents

E.01 Master Plans

E.02 Developed Civil Concept Design

E.03 Concept Visual Simulations

Part F – Consultation and Engagement

F.00 Cover and List of Documents

F.01 Intention to Lodge and Section 30(3) Letter to the Otago Regional Council

F.02 Section 30(3)(b) Letter from Otago Regional Council

F.03 Intention to Lodge Letter to the Ministry for the Environment

F.04A NON-REDACTED Kā Rūnaka Process Agreement

F.04B REDACTED Kā Rūnaka Process Agreement

F.05 KiwiRail Letter of Support

F.06 Aurora Energy Letter

F.07 Fonterra Letter of Support

Part G – Rules Assessment

G.00 Cover and List of Documents

G.01 Rules Assessment

Part H – Land Ownership and Records of Title

H.00 Cover and List of Documents

H.01A NON-REDACTED Records of Title and Landowner Table

H.01B REDACTED Records of Title and Landowner Table

H.02 Records of Title - Properties within Consent Area

H.03 Records of Title – Properties Adjacent to Consent Area

Part I – Existing Approvals

I.00 Cover and List of Documents

I.01 Archaeological Authority

I.02 Consent 2001.183 – Land Use for Stock Water and Domestic Supply

I.03 Consent 2001.183 95678 – Water Use for Irrigation

I.04 Consent 95871 – Land Use for Construction of Bores

E. LIST OF ACRONYMS AND GLOSSARY OF TERMS

LIST OF ACRONYMS

Acronym	Meaning
the Act	Fast-track Approvals Act 2024
AEP	Annual Exceedance Probability
asl	above sea level
bgl	below ground level
CAA	Civil Aviation Authority
CMP	Construction Management Plan
CSMP	Contaminated Site Management Plan
DCC	Dunedin City Council
District Plan	Dunedin 2nd Generation District Plan
DOC	Department of Conservation
DSI	Detailed Site Investigation
Dynes Transport	Dynes Transport Tapanui Limited
EPA	Environmental Protection Agency
FDS	Dunedin City Council Future Development Strategy 2024
FTAA	Fast-track Approvals Act 2024
FTE	full-time equivalent
GDP	Gross Domestic Product
HAIL	Hazardous Activities and Industries List
ITA	Integrated Transport Assessment
Kāi Tahu Management Plan	Kāi Tahu Ki Otago Natural Resource Management Plan
LUC	Land use capability

Acronym	Meaning
NES-CS	National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NES-F	National Environmental Standards for Freshwater 2020
NPS-FM	National Policy Statement for Freshwater Management 2020
NPS-HPL	National Policy Statement of Highly Productive Land
NPS-I	National Policy Statement for Infrastructure 2025
NPS-IB	National Policy Statement for Indigenous Biodiversity 2023
NPS-NH	National Policy Statement for Natural Hazards 2025
NPS-UD	National Policy Statement on Urban Development 2020
OLS	Obstacle Limitation Surfaces
ORC	Otago Regional Council
PORPS	Proposed Otago Regional Policy Statement 2021
Port Otago	Port Otago Limited's property subsidiary or Chalmers Property Limited
Proposed RPS	Proposed Otago Regional Policy Statement
RAP	Remedial Action Plan
Regional Air Plan	Regional Plan: Air for Otago
Regional Waste Plan	Regional Plan: Waste for Otago
Regional Water Plan	Regional Plan: Water for Otago
RL	Relative Level
RMA	Resource Management Act 1991
RPS	Operative Otago Regional Policy Statement 2019
SCS	Commercial/Industrial Soil Contaminant Standard
SGV	Soil Guideline Value

Acronym	Meaning
SLIP	Southern Link Inland Port
SLPL	Southern Link Property Limited
SNA	Significant Natural Area
TEU	Total Equivalent Units
TIA	Treaty Impact Assessment

GLOSSARY OF TERMS

Term	Meaning
the Applicant	Southern Link Property Limited
Application	refers to this report or substantive application
Fortex pipeline	300 mm PVC pressurised wastewater pipeline on Odlins Place and Stedman Road
the Project	refers to the construction, use and operation of the Southern Link Inland Port
referral project	a project that is accepted and recognised as having significant regional and / or national benefits under section 26 of the FTAA.
the Site	refers to an ~40-hectare site located at 270 -292 Dukes Road North, North Taieri, for the purposes of the SLIP

1. INTRODUCTION

This substantive application ("**Application**") is made on behalf of Southern Link Property Limited ("**the Applicant**" or "**SLPL**") and seeks approvals under the Fast-track Approvals Act 2024 ("**FTAA**" or "**the Act**") to authorise the construction, use and operation of the Southern Link Inland Port ("**SLIP**" or "**the Project**") in Mosgiel, Dunedin, which was accepted as a "referral project" under section 26 of the FTAA.

The SLIP was accepted as a "referral project" by the Minister for Infrastructure in August 2025, recognising the significant regional and / or national benefits that will be delivered by the Project.

This substantive application seeks approvals for land use consents, water permits, and discharge permits that would otherwise be applied for under the Resource Management Act 1991 ("**RMA**").

An Archaeological Authority under the Heritage New Zealand Pouhere Taonga ("**HNZPT**") Act 2014 has already been issued in relation to works on the site of the SLIP and is therefore not sought under the Application (Archaeological Authority 2026-362). No further Archaeological Authorities are required for this application.

An approval under the Wildlife Act 1953 will be applied for separately for the proposed salvage, relocation and incidental (not directly intended) killing of native tussock skink (*Oligosoma chionochloescens*) on the site of the SLIP and therefore is not sought under the application.

This document sets out the information required by section 43 and Schedule 5 of the FTAA and includes a detailed description of the Project and a comprehensive assessment of actual and potential environmental effects associated with the SLIP.

1.1 BACKGROUND

The SLIP will be a purpose-built inland port and logistics hub which will act as a logistics solution for Port Otago. Port Otago is currently facing significant logistics and operational constraints that limit its ability to expand and meet the growing demands of the South Island's containerised freight exports and importers.

Freight transport is critical to achieving a thriving urban and rural economy within the district and wider region, and the proposed location for the SLIP is indicatively identified for the purposes of a 'Logistics Park / Freight Hub' under the Dunedin City Council ("**DCC**") Future

Development Strategy 2024 ("**FDS**")[1], which was jointly prepared by DCC and Otago Regional Council ("**ORC**").

The approximately 40-hectare site for the SLIP is located at 270 -292 Dukes Road North, North Taiari within the territorial boundaries of Dunedin and the wider Otago Region ("**the Site**") (legally described as Part Section 9 Block V East Taieri Survey District, Part Section 10 Block V East Taieri Survey District, & Deposited Plan 5579 East Taieri Survey District). Ancillary activities for the Project are proposed within the Dukes Road North road reserve. Works for the Project will also occur within the adjacent KiwiRail corridor located to the west of the Site but are not proposed as part of this Application and if these activities require resource consent these will be applied for under the RMA concurrently to this application (as detailed further in Section 1.9). The location of the Project within the wider surrounding environment is shown in Figure 1-,1with the Site and adjacent KiwiRail corridor illustrated in Figure 1-2.

The Site and the Dukes Road North road reserve are zoned Taieri Plains Rural under the Dunedin 2nd Generation District Plan (the "**District Plan**"). The Taieri Plains Rural Zone aims to ensure rural areas are reserved for productive rural activities along with certain activities that support the well-being of communities where these activities are most appropriately located in a rural rather than an urban environment. For the reasons set out in this substantive application, the SLIP is considered to be appropriately located on the Site.

The Site is located on land identified as highly productive land ("**HPL**") as it meets the definition in the National Policy Statement for Highly Productive Land 2022 ("**NPS-HPL**"). HPL must be protected for use in land-based primary production both now and for future generations, however, for reasons set out in this substantive application, the development of the SLIP meets the NPS-HPL's clause 3.10 exemption criteria for such protection, with the Site therefore being appropriate for the Project.

The Site is not subject to any statutory acknowledgements but sits within the Taiari Catchment which includes the Waipouri / Waihola Wetland Statutory Acknowledgement Area and the topuni site of the Mauka Atua mountain range. The Site is located solely within the takiwa of Te Runanga o Ōtākou who holds tino rakatirataka for the area, consistent with the tikaka of Te Rūnanga o Ngāi Tahu.

Consultation by SLPL with Te Rūnanga o Ngāi Tahu (as detailed further in Section 5) has confirmed that in relation to the SLIP, that the position of the Kā Rūnaka ki Ōtākou ("**Kā**

[1] DCC Future Development Strategy 2024 – Priority 6.3.2.4: Investigation and establishment of an inland freight hub.

Rūnaka") (formed of Te Rūnanga o Ōtākou, Kati Huirapa ki Puketeraki and Te Rūnanga o Moeraki) is to be regarded as the position of Te Rūnanga o Ngāi Tahu.

For reference purposes, it is noted that the original name provided by mana whenua for the surrounding geographical catchment is Taiari, despite most modern maps and references referring to the areas as Taieri. This Application therefore refers to the geographical area and named features as Taiari, with the exception of any references to legal identifiers (such as site appellations or business names) or statutory plan provisions (such as the Taieri Plains Rural Zone under the District Plan).



Figure 1-1: General Location of the Southern Link Inland Port

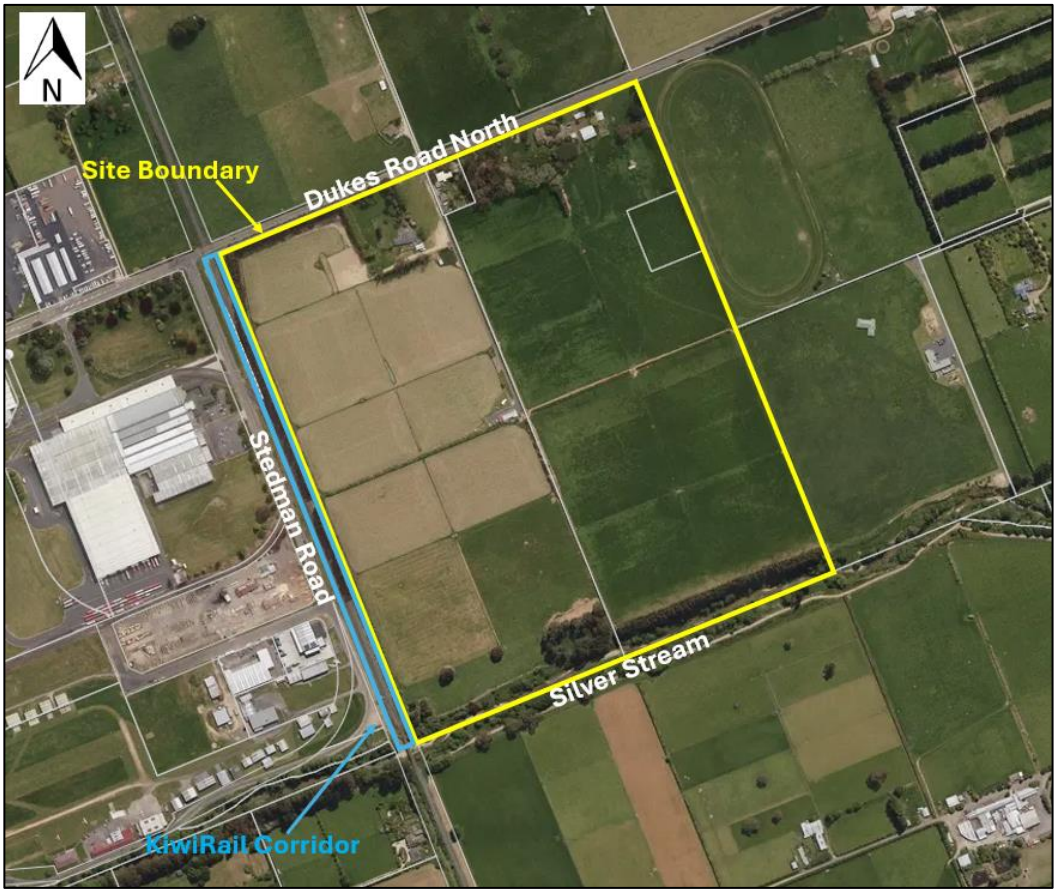


Figure 1-2: Site (Yellow) and KiwiRail Corridor (Blue)

The Applicant, SLPL, is a joint venture between Chalmers Property Limited (Port Otago Limited's property subsidiary or "**Port Otago**") and Dynes Transport Tapanui Limited ("**Dynes Transport**"), a logistics operator in the region, as detailed further in Section 1.4.

The SLIP will facilitate a mode shift from road to rail for freight to Port Otago by shifting existing truck-based warehousing and logistics to rail, leveraging the existing KiwiRail Taieri Branch Rail Line to deliver containerised freight to Port Chalmers. This will reduce heavy vehicle movements on urban Dunedin roads by approximately 29,860 per annum, increasing operational efficiency, and reducing carbon emissions and road maintenance costs.

Broadly, the SLIP will include:

> A new rail siding off the Taieri Branch Rail Line to enable loading, unloading and operation of a rail freight shuttle service to Port Chalmers and the wider rail network;

> Approximately 80,000 m^2 of high stud warehousing (chilled and ambient);

> Truck canopy and unloading areas;

- A 5 hectares container depot facility enabling the inspection, cleaning, upgrading and repair of containers including for food grade repacking;
- Up to 5 hectares of container terminal for storage of full containers including refrigerated containers;
- Break bulk storage facilities;
- Road widening; and
- Ancillary activities to support the above including earthworks, construction of the rail siding, site access, internal roadways and parking, hardstand areas, truck waiting areas, onsite road network, three waters infrastructure, flood mitigation, landscaping, buildings for storage, administration and maintenance facilities, and associated infrastructure and works including measures necessary to manage stormwater and stabilise the site.

The SLIP will be developed in three stages. At the completion of Stage 1, the SLIP will be operational with Stages 2 & 3 consisting primarily of expansion of container, warehousing and servicing across the Site as demand for the logistics capacity of the SLIP arises.

A full description of the SLIP is provided in Section 2 – Project Description.

1.1.1 Project Rationale

Existing logistics operations at Port Chalmers and surrounding depots are increasingly constrained. Port Chalmers is operating near maximum logistics capacity, with geographical constraints preventing any further expansion of the port unless significant harbour reclamation were to occur. The distribution of container and freight operations to warehouses throughout Dunedin via truck has provided some relief to the capacity constraints, however, these operations create a significant load on the urban transport network and are relatively inefficient with poor resilience.

An example of such poor resilience is evident in the fact that the lease of Port Otago's existing offsite container depot (which is currently operating at full capacity (the Strathallan Street depot)) is to be terminated in 2030 with no right of renewal. A new location for the container depot is required to provide a fit-for-purpose replacement on a suitable site that will ensure operations can continue without disruption.

The SLIP presents an opportunity to:

- Consolidate container operations associated with Port Chalmers;
- Improve the efficiency of the Dunedin and wider Otago Region logistics network through said consolidation and use of the KiwiRail network;

- Increase the resilience of port operations by enabling rail operations in addition to truck movements; and
- Reduce the number of heavy vehicles operating in Dunedin reducing the strain on the transport network and reducing carbon emissions associated with freight transport activities in the region.

The SLIP also presents an opportunity to expand the operations of Port Chalmers while avoiding further reclamation of the harbour which is not considered feasible as a result of the environmental effects that would arise from such reclamation.

The proposed siting of the SLIP has been carefully selected taking into consideration the following matters:

- The Site is identified under the FDS for the purposes of a 'Logistics Park / Freight Hub';
- The Site is located adjacent to KiwiRail's automatically controlled Taieri Branch Rail Line which can be utilised to operate shuttle train services to deliver containerised freight to Port Chalmers;
- The Site topography is flat, large and square enabling establishment of an optimally sized rail siding (capable of accommodating a longer train of 24 x 40 foot wagons) and site layout for operational efficiencies;
- The rural site is directly adjacent to an existing industrial precinct and relatively isolated from nearby sensitive receivers, thereby minimising potentially impacted persons;
- The Site is relatively close to Dunedin, remaining accessible to Port Chalmers by road and rail, and accessible to logistics / freight users in the region; and
- The Site is adjacent to the Mosgiel industrial hub, including a Fonterra distribution centre, which is a significant source of containerised freight to Port Chalmers, unlocking opportunities for coordination and increased economies of scale.

1.2 PURPOSE OF THE FAST-TRACK APPROVALS ACT 2024

The purpose of the Act is:

> *'to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.'*

Port Otago is a lifeline utility with important duties to fulfill under the Civil Defence Emergency Management Act 2002. Of most relevance to this Project, every lifeline utility

must ensure that it is able to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency.[2]

The SLIP will increase the resilience of Port Chalmers operations providing a geographically separate facility to the main coastal port that has multi-modal accessibility (rail and multiple transport routes) in case of transport network disruptions as well as container and freight maintenance and storage facilities for resilience of logistics operations in the region.

The SLIP will deliver significant demonstrable short-term and long-term benefits throughout both the construction and operational phases of the Project, providing benefit to Dunedin, the Otago Region, and New Zealand more broadly. These benefits include:

- Generation of approximately $191.3 million in value added impacts (including indirect and induced impacts) over the 10 years of construction;
- The construction of the SLIP over 10 years is expected to sustain 1,489 full-time equivalent ("**FTE**") jobs nationally;
- The operational phase of the SLIP will create 21 transferred positions[3] and add 104 net high-value permanent jobs;
- Enabling growth in export volumes and market share beyond current facility capacity while supporting primary sector exports in Otago, Southland and South Canterbury;
- Increased utilisation of KiwiRail's existing rolling stock and track assets between Mosgiel and Port Chalmers. An initial uplift of 15,000 (30,000 Total Equivalent Units ("**TEU**")) and projected growth up to 40,000 wagons per annum is expected;
- An initial reduction in heavy vehicle movements on the Dunedin road network of approximately 30,000 per annum associated with operation of Stage 1 which will lead to significant road maintenance cost savings and improved transport efficiency;
- A reduction in road congestion, travel time, and road maintenance costs;
- An initial reduction in carbon, in the order of 1,050-1,100 tonnes per annum of CO_2e, greenhouse gas emissions, and air quality enhancement as a result of the Stage 1 modal shift, and associated improvements to air quality; and

[2] Civil Defence Emergency Management Act 2002, Section 60(a).

[3] As the Inland Port provides the opportunity to consolidate some of Dynes Transport and Port Otago's operations in Mosgiel, some jobs/roles will be transferred from other sites within Dunedin City.

- Improved supply chain resilience through multi-modal accessibility and reduced reliance on vulnerable transport routes delivering an enhanced competitiveness of Port Otago.

1.3 INFORMATION REQUIREMENTS

Clauses 5-7 in Schedule 5 of the Act set out the information requirements for a substantive application for approvals required under the RMA. Relevant to this Project, these are:

- **A description of the proposed activity, including a description and map of the proposed location:**[4]

  This is addressed in Section 2 of this Application.

- **Confirmation that the application complies with Section 46(2)(a), (b), and (d) of the Act (regarding completeness and scope):**[5]

  In accordance with section 46 if the Act, [6] this Application for the SLIP:

  - Has been developed to adhere to the requirements of section 42 of the Act;[7],[8]
  - Includes all of the information listed in section 43 of the Act (as described in Section 8 of this Application), and is specified in sufficient detail to satisfy the purpose for which it is required in accordance with Section 44 of the Act;
  - Is solely for a referred project;[9]
  - Does not involve an ineligible activity (as described in Section 8.7 of this Application); and[10]
  - SLPL has paid the Application fee as required by the Act.[11]

- **The full name and address of (i) each owner of the site and of land adjacent to the site, and (ii) each occupier of the site and of land adjacent to the site whom the applicant is unable to identify after reasonable inquiry:**[12]

  This is addressed in Section 3 of this Application.

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4 Schedule 5, Clause 5 (1)(a) & (b) of the Act.
5 Schedule 5, Clause 5 (1)(c) of the Act.
6 Steps by EPA after substantive application lodged.
7 Section 46 (2)(a)(i) of the Act.
8 Section 46 (2)(a)(ii) of the Act.
9 Section 46 (2)(b) of the Act.
10 Section 46 (2)(c) of the Act.
11 Section 46 (2)(d) of the Act.
12 Schedule 5, Clause 5(1)(d) of the Act.

- **A description of any other activities that are part of the proposal to which the consent application relates:**[13]

  Section 2 of this Application contains a detailed description of all aspects of the Project.

- **A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates:**[14]

  This information is addressed in Section 4 of this report.

- **An assessment of the activity against Sections 5, 6 and 7 of the RMA:**[15]

  An assessment of the Project against the purpose and principles of the RMA is set out later in this report, in Section 9.2.

- **An assessment of the activity against any relevant provisions of the following documents:**[16]

  - **A national environmental standard;**
  - **Other regulations made under the RMA;**
  - **A national policy statement;**
  - **A regional policy statement or proposed regional policy statement;**
  - **A plan or proposed plan; and**
  - **Iwi management plans.**

  The Project is assessed against the provisions of these documents in Section 9.3 of this report.

- **Information about any Treaty settlements that apply in the area covered by the consent application:**[17]

  Information about applicable Treaty settlements is included in Section 9.3.16 of this report.

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13 Schedule 5, Clause 5 (1)(e) of the Act.

14 Schedule 5, Clause 5 (1)(f) of the Act.

15 Schedule 5, Clause 5(1)(g) of the Act.

16 Schedule 5, Clause 5(1)(h) of the Act.

17 Schedule 5, Clause 5(1)(i) of the Act.

- **A list of any relevant customary marine title groups, protected customary rights groups, or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011:**[18]

  Not applicable.

- **The conditions that the applicant proposes:**[19]

  A suite of proposed conditions is included in **Part C** of these application documents.

- **A copy of the notice required under Section 30 of the Act:**[20]

  A copy of the letter from ORC is included in **Part F** of these application documents.

- **An assessment of the activity's effects on the environment that covers the information required in clause 6 and matters specified in clause 7 of Schedule 5 of the Act:**[21]

  Section 6 of this Application provides an assessment of actual and potential effects on the environment. Technical assessments provided in **Part B** of these application documents, also provide a comprehensive assessment of the Project's effects on the environment.

- **If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under the RMA):**[22]

  A detailed rules assessment for approvals required under the RMA, which includes an assessment of all the relevant permitted activities, is provided in **Part G** to this report.

1.4 THE APPLICANT - SOUTHERN LINK PROPERTY LIMITED

1.4.1 Overview

Southern Link Property Limited is a joint venture between Port Otago and Dynes Transport formed in March 2023.

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18 Schedule 5, Clause 5(1)(j) of the Act.

19 Schedule 5, Clause 5 (1)(k) of the Act.

20 Schedule 5, Clause 5 (1)(l) of the Act.

21 Schedule 5, Clause 5 (4) of the Act.

22 Schedule 5, Clause 5 (5)(a) of the Act.

Port Otago

Port Chalmers is operated by Port Otago and is the South Island's largest export port benefitting from being a large primary export cargo region. Port Otago is the successor to the Otago Harbour Board and was established following the Port Companies Act 1988. Port Otago's land-based commercial port infrastructure at both Dunedin Bulk Port and Port Chalmers is 100% owned by ORC. The existing Port Chalmers Container Terminal is currently constrained by a lack of landside infrastructure to hold a buffer stock of empty containers and full export containers ready for dispatch.

Port Otago has a long lineage of critical freight operations and supply chain operations in the lower South Island which support international trade across containerised freight, bulk cargo and associated logistics. Additional space is needed for future supply chain demands of lower South Island exporters with Port Otago currently operating an additional two inland depots in Dunedin. These two inland depots will be consolidated into the SLIP freeing up 4 hectares of industrial land for alternative development.

Port Otago undertakes long-term land-use planning and development to ensure port and freight activities can operate efficiently, safely and sustainably. Chalmers Property Limited was established to own, manage and develop industrial and logistics focused property assets supporting operational and strategic requirements of Port Otago and the wider freight and logistics network.

With a rich 150-year history of operations, Port Otago recognises that it has the means to support organisations and a breadth of causes and community initiatives. This is demonstrated by Port Otago's ongoing commitment to environmental causes, emergency services, education, youth, recreation, community sports and heritage initiatives. During the 2023 / 2024 year, 60 organisations were supported by Port Otago through 121 active sponsorships which targeted:

> Harbour community;

> Water-based sports;

> Water safety; and

> Kaimahi.

Port Otago's financial contributions included $3 million allocated for restoration and development of Te Rauone Beach in partnership with DCC, construction of the Warren Lewis Fishing Jetty involving investment of $1 million, and the donation and repurposing of around 40 shipping containers for a range of recreation and community organisations around the Otago Region.

Dynes Transport

Dynes Transport is a privately held New Zealand logistics company founded in Tapanui in 1969, which pioneers nationwide transport solutions across dairy, forestry, viticulture and bulk goods. Dynes Transport owns Icon Logistics, which currently operates from six sites across Southland / Otago and has over 26,000 m^2 of warehousing spread across five sites.

The company employs over 300 staff with operations in Dunedin (head-office), Tapanui, Christchurch and Blenheim, with a sole North-Island base in Hamilton.

Dynes Transport operates across a wide range of transport and logistics services with particular strength in bulk freight, industrial cartage and innovative supply-chain solutions accounting for approximately 75% of the containers on the road in Otago with 130 trucks on the road on any given day. Their core activities include:

> Road freight transport;

> Multi-site logistics and storage operations; and

> Integrated logistics solutions.

1.5 APPROACH TO EFFECTS MANAGEMENT

Whilst the benefits of the SLIP are significant both nationally and regionally and clearly meet the purpose of the FTAA, the actual and potential environmental effects associated with its construction, use, and operation need to be managed appropriately.

SLPL has iteratively developed and refined the Project in a manner which reduces environmental effects. Notably, this has included (but is not limited to):

> Carefully refining the location, size and layout of the SLIP and providing acoustic walls and landscaping boundary treatment to minimise effects to nearby sensitive receivers;

> Restricting the operating hours of the rail siding to minimise potential noise effects;

> Limiting the height of buildings, structures and container stacking on the Site to avoid intruding into the flight fan of the nearby Taieri Aerodrome;

> Refining the stormwater strategy on the Site to avoid increasing flood effects on neighbouring, upstream, or downstream receivers;

> Designing earthworks to reutilise suitable cut material onsite for fill where possible;

> Engaging a range of technical specialists to assess the effects of construction and operational activities and to advise on how best to mitigate these effects on the surrounding environment and community; and

- Working with independent expert ecologists to manage actual and potential impacts on flora and fauna, and Silver Stream.

Section 6 of this report provides an assessment of the actual and potential effects of the Project, which is based on the various technical assessments commissioned by SLPL. Many of the technical assessments have recommended the implementation of measures to avoid, remedy or mitigate potential adverse effects on the environment. These recommendations have shaped the development of the robust suite of proposed conditions of consent, as provided in **Part C** of these application documents.

Construction, use, and operation activities will be managed as appropriate by of the proposed conditions, along with management plans as summarised in Section 7 of this report. SLPL is seeking for all management plans associated with the Project to be certified by the relevant consent authority prior to their implementation. These management plans are listed in Table 1-1.

Table 1-1: SLIP Management Plans

Management Plans to be certified at a later date by ORC
- Erosion and Sediment Control Plan
- Spill Response Plan
- Remedial Action Plan
- Contaminated Site Management Plan
Management Plans to be certified at a later date by DCC
- Construction Management Plan ("**CMP**"), including: - Remedial Action Plan   - Contaminated Site Management Plan   - Erosion and Sediment Control Plan   - Spill Response Plan   - Wildlife Hazard Management Plan

1.6 ENGAGEMENT WITH MANA WHENUA, COMMUNITY STAKEHOLDERS AND INTERESTED PARTIES

SLPL's engagement with mana whenua, administering authorities, and a range of stakeholders who have interests in the Project has been guided by a commitment to engage in good faith and in an active, open and transparent manner.

Accordingly, SLPL has adopted and promoted an active and open stakeholder engagement approach with mana whenua, the relevant local and regional councils, and various stakeholders (including KiwiRail) to develop ongoing relationships and ensure that perspectives, values and concerns of parties are understood and incorporated into the Project's design and operation. Engagement with neighbouring properties and the wider community will occur following the lodgement of the Application.

This consultation has helped SLPL to refine the Project and this Application to ensure that effects are comprehensively managed, as detailed further in Section 5 of this report which provides an overview of SLPL's consultation and engagement to date, and resulting steps and actions that have been made by SLPL in response to feedback received.

During initial consultation with mana whenua, SLPL offered support and resourcing for the preparation of a Cultural Impact Assessment. As ongoing engagement has occurred, the Kā Rūnaka has drafted an iwi-led Treaty Impact Assessment ("**TIA**"). SLPL has viewed a draft and unendorsed version of this TIA, however at the time of lodgement a finalised / endorsed version of the TIA has not been issued. Once the TIA has been provided by the Kā Rūnaka, SLPL will provide a copy to the Environmental Protection Authority ("**EPA**").

Ongoing engagement with the Kā Rūnaka will continue to assist in ensuring that Māori cultural values and interests are appropriately provided for by the SLIP.

1.7 LAND OWNERSHIP

The various properties that will accommodate the construction, use, and operation of the SLIP, including supporting ancillary activities applied for under this Application are documented in Table 1-2. A copy of the Records of Title for each property is attached within **Part H**.

Table 1-2: Land Ownership Details

Address (if applicable)	Legal Owner	Title	Appellation
270 Dukes Road North, Mosgiel	Southern Link Property Limited	OT3C/897	Part Section 10 Block V East Taieri Survey District
292 Dukes Road North, Mosgiel	Southern Link Property Limited	OT3C/899	Part Section 9 Block V East Taieri SD
274 Dukes Road North, Mosgiel	Southern Link Property Limited	OT304/127	DP 5579
N/A	Southern Link Property Limited	OT329/233	Part Section 9 Block V East Taieri SD
Dukes Road North – Road Reserve	DCC	N/A	Parcel ID: 3200305

1.8 APPLICATION STRUCTURE

This Application has been prepared in support of the substantive application made by SLPL to the EPA for approvals required to authorise the construction, use, and operation of the SLIP.

This report is intended to be read as a standalone document, along with its appendices (inclusive of technical assessments as set out in Table 1-3, and the proposed conditions of consent provided in **Part C**), which provide the expert consenting Panel with the information needed to determine the application in accordance with section 81 of the FTAA.

Part A includes a table of contents and glossary along with the substantive application report split into the following sections:

Section 1: **Introduction**
Provides an introduction to the purpose and features of the SLIP.

Section 2: **Project Description**
Provides a detailed description of the SLIP and associated ancillary activities.

Section 3: **Environmental Setting**

Describes the environmental setting within which the SLIP is proposed, including general site characteristics and physical setting.

Section 4: **Approvals Sought Under the Fast-track Approvals Act**
Details the approvals sought under the FTAA for the SLIP.

Section 5: **Consultation and Engagement**
Outlines the consultation that has been undertaken by SLPL and outcomes of this consultation.

Section 6: **Assessment of Environmental Effects**
Provides an assessment of the actual and potential environmental effects associated with the SLIP as they relate to the requirements of the RMA and the FTAA.

Section 7: **Management and Monitoring of Effects**
Provides a summary of the measures, controls and monitoring recommended by the technical reports and proposed by SLPL to assist in avoiding, remedying and / or mitigating effects associated with the Project.

Section 8: **Statutory Assessment – Fast-track Approvals Act 2024 Requirements**
Sets out and assesses the Project against the requirements of the FTAA.

Section 9: **Statutory Assessment – Approvals Relating to the Resource Management Act 1991**
Sets out and assesses the Project against the relevant provisions of the RMA.

Section 10: **Conclusion**
Provides a conclusion relevant to the consideration of this Application.

Part B Contains 16 reports prepared by technical specialists relating to the Project and its environmental effects.

Part C Contains the conditions SLPL proffers for the inclusion on each of the approvals being sought.

Part D Contains drafts of three of the six management plans which are proposed, setting out measures necessary to assist with managing the environmental effects of the SLIP.

Part E Is a graphic supplement of technical drawings and visual renders showing key project components.

Part F Contains copies of the key correspondence with section 30(2) parties and copies of letters of support.

Part G Contains an assessment of the rules which are triggered by the proposed activities associated with the construction, use, and operation of the SLIP under the relevant RMA planning documents.

Part H Contains details of land ownership of proposed works areas and adjacent owners, and all relevant Records of Title for the proposed works areas.

Part I Contains copies of existing approvals for the Site.

The technical reports included in **Part B** are listed in Table 1-3. They are referenced throughout this report as relevant.

Table 1-3: Technical Reports Prepared by Technical Specialists on the Project

Author	Topic	Title	Reference within report	Date
Savvy Consulting Limited	Economic Assessment	Southern Link Logistics Park – Economic Assessment	(Savvy Consulting, 2026)	13 April 2026
Stantec New Zealand	Geotechnical Assessment	Southern Link Inland Port – Geotechnical Desktop Study and Appraisal	(Stantec, 2026a)	15 April 2026
Stantec New Zealand	Groundwater Assessment	Southern Link Inland Port – Groundwater Assessment	(Stantec, 2026b)	16 April 2026
Stantec New Zealand	Transport	Southern Link Inland Port – Integrated Transport Assessment	(Stantec, 2026c)	15 April 2026
Stantec New Zealand	Stormwater	Southern Link Inland Port – Stormwater Assessment	(Stantec, 2026d)	15 April 2026
Stantec New Zealand	Wastewater	Southern Link Inland Port – Wastewater Assessment	(Stantec, 2026e)	16 April 2026
Stantec New Zealand	Water	Southern Link Inland Port – Non-Potable and Potable Water Assessment	(Stantec, 2026f)	16 April 2026
Stantec New Zealand	Design	Southern Link Inland Port – Civil Works and Earthworks	(Stantec, 2026g)	16 April 2026
E3 Scientific Limited	Terrestrial Ecology	Southern Link Inland Port – Terrestrial Ecological Impact Assessment	(E3 Scientific, 2026a)	14 April 2026
E3 Scientific Limited	Freshwater Ecology	Southern Link Inland Port – Freshwater Ecological Impact Assessment	(E3 Scientific, 2026b)	16 April 2026
Environmental Consultants Otago Limited	Contaminated Land	Detailed Site Investigation – 270-292 Dukes Road North Mosgiel for Southern Link Property Limited	(EC Otago, 2026)	13 April 2026

Author	Topic	Title	Reference within report	Date
Marshall Day Acoustics Limited	Noise	Southern Link Inland Port – Noise Assessment	(Marshall Day Acoustics, 2026)	15 April 2026
Pedersen Read	Lighting	Southern Link Inland Port Application – Assessment of Environmental Effects (Lighting)	(Pedersen Read, 2026)	15 April 2026
Mike Moore Landscape Architect	Landscape and Natural Character	Southern Link, Inland Port, Mosgiel – Landscape and Natural	(Mike Moore, 2026)	16 April 2026
Astral Limited	Aviation	Southern Links Logistic Park Development - Aviation Impact Report for Southern Links Property Limited	(Astral, 2026)	10 April 2026
AbacusBio	Highly Productive Land	Southern Link Logistics – Land Assessment	(AbacusBio, 2026)	10 April 2026

1.9 WORKS WITHIN THE KIWIRAIL CORRIDOR

The construction, use, and operation of the SLIP will also require some minor work to be carried out within the KiwiRail corridor (Stedman Road Railway Corridor, Parcel ID: 317315) located immediately adjacent to the western boundary of the Site. Where relevant, these works are referred to in this document as well as in a selection of the technical reports supporting the Application.

Consent will be sought by SLPL for those activities within this land parcel requiring consent. The activities within the KiwiRail corridor will consist of:

- Construction of the western extent of the proposed western stormwater swale that will straddle the shared boundary of the SLIP and the KiwiRail corridor (with the remaining eastern extent of the swale (located within the Site) proposed to be constructed as part of this Application, as described in Section 2.20). This will support the proposed stormwater management scheme for the Site;
- Construction of the western extent of the proposed stormwater attenuation pond spillway that will straddle the shared boundary of the SLIP and the KiwiRail corridor (with the remaining eastern extent of the spillway (located within the Site) proposed to be constructed as part of this Application, as described in Section 2.20). This will support the proposed stormwater management scheme for the Site; and
- Planting of a Pittosporum eugenioides / tenuifolium screening tree belt along the top of the western extent of the stormwater swale within the KiwiRail corridor. This planting will provide additional visual mitigation of views of the SLIP from the west.

Preliminary design for the works in the KiwiRail corridor has been completed with input from KiwiRail, DCC, and ORC.

An agreement has been made in principle between SLPL and KiwiRail (refer to the letter provided in **Part F**) for the proposed utilisation of both the KiwiRail corridor for SLIP related activities and utilisation of the railway network (refer to Section 5.3.1). It is expected that resource consents that are required for work within this land will be relatively straightforward and SLPL expects that these can be processed efficiently by the relevant consent authority.

2. PROJECT DESCRIPTION

2.1 INTRODUCTION TO THE PROJECT

The SLIP is a purpose-built inland port / logistics hub intended to support Port Otago and Dynes Transport in servicing and future-proofing the Otago Region's supply chains while contributing to regional Gross Domestic Product ("**GDP**") growth. Strategically positioned alongside existing rail infrastructure in Mosgiel, the SLIP presents an opportunity to shift a significant proportion of road-to-port freight onto rail, reducing pressure on the wider transport network. The development will incorporate modern warehousing, efficient container-handling facilities and a new rail siding to deliver an integrated and resilient freight solution for the region. The Site will be MPI and customs compliant for imports and exports, including the potential for a free trade zone to be developed.

As listed in Section 1, the SLIP will include:

- A new rail siding off the Taieri Branch Rail Line to enable loading, unloading and operation of a rail freight shuttle service to Port Chalmers and the wider rail network;
- Approximately 80,000 m^2 of high stud warehousing (chilled and ambient);
- Truck canopy and unloading areas;
- A 5 hectares container depot facility enabling the inspection, cleaning, upgrading and repair of containers including for food grade repacking;
- Up to 5 hectares of container terminal for storage and movement of empty and full containers including refrigerated container charging ports;
- Break bulk storage facilities;
- Road widening;
- Ancillary activities to support the above including earthworks, construction of the rail siding, site access, internal roadways and parking, hardstand areas, truck waiting areas, onsite road network, three waters infrastructure, flood mitigation, landscaping, buildings for storage, administration and maintenance facilities, and associated infrastructure and works including measures necessary to manage stormwater and stabilise the site.

The establishment of the SLIP will involve site clearance, earthworks, construction of the rail siding, site access, internal roadways and parking, hardstand areas, buildings for storage, administration and maintenance facilities, and associated infrastructure, landscaping and

works and management activities necessary to manage stormwater, sediment and erosion, stability of the Site and general environmental effects during construction.

For clarity, this Application does not seek to provide for activities relating to the storage and use of hazardous substances at the SLIP, or the use of boilers and / or generators on the Site. Any necessary approvals associated with these activities will be applied for outside of the FTAA process.

Figure 2-1 below shows the concept layout of the SLIP, with elements of the Project described in further detail in the sub-sections below.

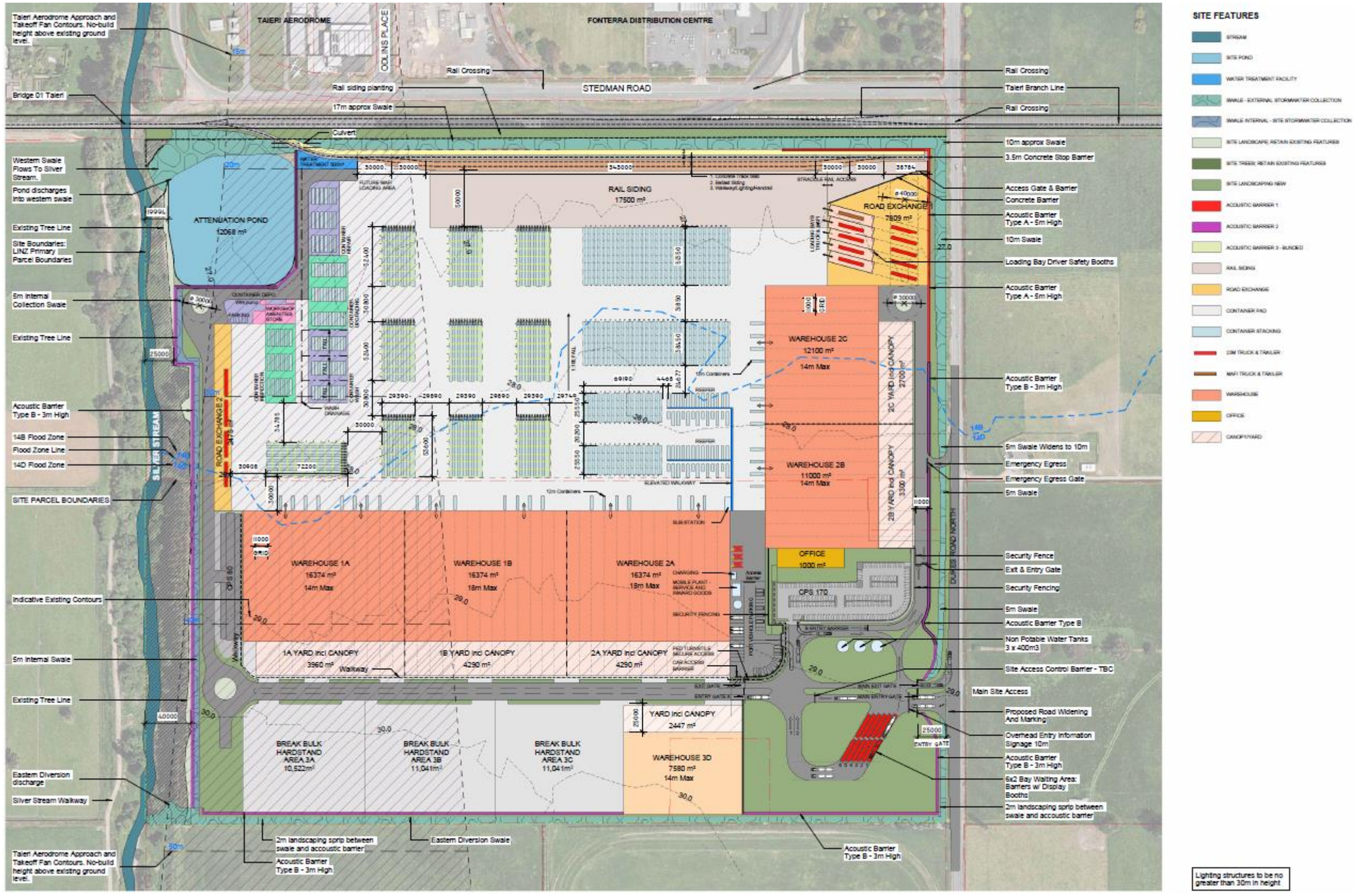


Figure 2-1: Proposed Site Plan and Layout

2.2 RATIONALE FOR THE PROJECT

The SLIP aims to provide a long-term, sustainable logistics solution that enhances the capacity, efficiency, and resilience of the Dunedin and wider Otago Region freight network. Specifically, the Project seeks to:

- Secure a sustainable growth future for the Dunedin container logistics sector;
- Maximise the use and efficiency of existing port and rail infrastructure assets;
- Strengthen the competitiveness of Port Chalmers, recognising that most ports across New Zealand already operate with a supply chain integrated with one or more inland ports;
- Improve the productivity and reliability of import and export supply chains across the southern South Island;
- Support a low-carbon transport economy by promoting rail over road freight movement; and
- Facilitate wider economic growth and resilience within the Otago Region.

The initial mode shift from road to rail enabled by the proposed SLIP will deliver immediate and measurable benefits for Dunedin and the wider Otago Region. These include reductions in road congestion, travel time, and road maintenance costs, alongside lower greenhouse gas emissions, improved fuel efficiency, and enhanced air quality. In addition, the Project will generate long-term economic advantages by improving the overall productivity and resilience of the region's import and export supply chains and regional GDP.

2.2.1 Current Freight Network Constraints

The existing logistics and freight network supporting Port Otago and the wider Dunedin area is experiencing a range of operational constraints. The container terminal at Port Chalmers is nearing capacity, which is constraining activity and creating increasing operational pressures. Growing demand for trans-shipped containers is further reducing the availability of space for exports. Physical land constraints also restrict any significant expansion of Port Chalmers, as physical land constraints also restrict any significant expansion, as further reclamation within the coastal marine area would need to be extensive and is not feasible. The situation is compounded by the need to import empty containers, which are essential for the southern South Island's export-dominated trade but creates additional congestion within the port. The storage and servicing of these empty containers occupy valuable wharf space that could otherwise be used for full container handling.

Adding to these challenges, global shipping reliability has declined substantially, with only around 65 percent of vessels arriving on schedule in 2024. This increasing unpredictability requires ports to maintain greater buffering capacity to accommodate export containers during delays. However, the Port Chalmers terminal has no meaningful buffering capacity meaning that when the terminal is full it can be forced to close its gates to export containers. These disruptions affect the wider supply chain, creating inefficiencies and occasionally leading to the diversion of trade to other ports. Further constraints relate to Port Otago's container depots, with the previously mentioned lease for the Strathallan Street depot in central Dunedin due to expire in 2030 with no right of renewal. In addition, the Port Otago Ravensbourne depot provides temporary additional storage capacity for empty containers, but its operations are entirely dependent on truck transport and are limited by access constraints, reducing its long-term viability.

2.2.2 Economic Benefits

The development of the proposed SLIP directly responds to the southern South Island's growing logistics needs by addressing existing constraints and supporting future economic growth. Port Otago is a critical economic driver for the Otago Region, and the proposed SLIP provides a strategic solution to these logistics issues. In doing so, it will strengthen the region's long-term economic competitiveness and sustainability.

An economic assessment of the proposed project, prepared by Natalie Hampson (Savvy Consulting, 2026) provided in **Part B**, concludes that the development will generate both short-term and long-term economic benefits.

During the construction phase alone, the development will provide a substantial boost to the local and regional economy. Construction activity is expected to sustain approximately 1,489 jobs nationally over the 10 year construction timeframe, and generate an estimated $191.3 million in total (direct, indirect and induced) value added with the majority of these impacts felt in the Otago Region. These short-term construction impacts represent a significant boost to the Dunedin and Otago economies, supporting employment, procurement, and local business activity.

There will be a broader and sustained economic benefit once the SLIP is operational. The facility will provide approximately 21 transferred positions and 104 net additional high-value permanent jobs, with further employment growth anticipated over time as activity scales up. The SLIP will also enable increased utilisation of KiwiRail's existing rolling stock and track assets, with an initial uplift of 15,000 wagons per annum, and foreseeable projected growth to 25,000, 35,000, and 40,000 wagons per annum along the Taieri Branch Rail Line corridor. This shift will not only increase the efficiency of freight movement but will also improve the financial and operational return on investment for KiwiRail.

2.2.3 Transport Efficiency

The scale and design of the SLIP are intended to provide a long-term transport efficiency solution for the region, with the shift from road to rail freight substantially reducing heavy vehicle movements through urban Dunedin.

Based on 2024 container trade volumes, this mode shift is expected to remove at least 15,000 one-way (or 30,000 return) truck journeys from city roads each year. Fewer heavy vehicles will improve community wellbeing by easing congestion, enhancing road safety, improving air quality, and reducing wear and tear on local roads. Given that a single heavy truck and trailer unit is equivalent to around 21 cars in terms of road degradation, this shift will also result in considerable cost savings in road maintenance for local authorities and NZ Transport Agency Waka Kotahi ("**NZTA**").

2.2.4 Supply Chains

The SLIP will deliver substantial supply chain productivity and resilience benefits. By consolidating container handling, storage, and warehousing activities on a single site, the Project will generate greater economies of scale and operational efficiencies. The co-location of logistics activities and direct rail connectivity will reduce transit times, lower freight risks, and improve transit reliability across the region's import and export networks. Increased full-container storage capacity will also provide critical buffering for exporters when shipping schedules are disrupted, improving the resilience of southern supply chains. Furthermore, the SLIP will reduce reliance on State Highway 88, which is occasionally impacted by slips and closures, thereby decreasing vulnerability to natural hazard risks.

2.2.5 Environmental Benefits

The SLIP will deliver measurable environmental benefits through a reduction in transport-related emissions. Every tonne of freight carried by rail delivers a 70% CO_2e emissions saving over road freight that utilises diesel heavy goods vehicles. The CO_2e reduction enabled by Stage 1 is anticipated to be up to 1,050-1,100 tonnes per annum across impacted supply chains. The Project will also result in reductions to greenhouse gas emissions.

The Project aligns with Dunedin's long-term vision for sustainable growth, economic resilience, and improved logistics capability to meet the region's future needs.

2.3 LOGISTICS AND CONTAINER OPERATIONS CONSOLIDATION

The SLIP will directly allow for the consolidation of Port Otago and Icon's container and warehousing operations through transfer and repurposing of operations to the SLIP, providing churn in the industrial market and opportunity to cater to latent business demand.

These opportunities are a direct result of the strategic planning of the SLIP and will be transformative to logistics in the region and potentially alleviate an identified shortfall in industrial land of 17 hectares[23] within the Harbourside area which is categorised as one of the most desirable areas for industrial businesses.

Consolidation of Port Otago's Dunedin City operations to the SLIP will include:

- Closure and relocation of the Strathallan and Ravensbourne depots;
- Relocation of 30-40% of empty dry / ambient container processing from Port Chalmers;
- Relocation of non-Fonterra warehousing and associated logistics services from Port Chalmers; and
- Refocussing of the majority of container movements (as far as practicable) to:
  - Direct all full export containers to arrive at Port Chalmers by rail via the SLIP;
  - Direct all full import containers (excluding containers that are destined to be railed north of Port Chalmers or delivered to customers in central Dunedin) to be collected from the SLIP rather than Port Chalmers / depots; and
  - Direct all empty containers to the SLIP rather than Port Chalmers / depots.

Consolidation of Icon's operations will include:

- Closure and relocation of the T-Shed, Carncross Street and 88 Parry Street East warehouses to the SLIP; and
- Change in role for the 95 Parry Street East and Sawyers Bay warehouses by relocating dairy exports and imports to the SLIP.

2.4 DEVELOPMENT STAGING AND TIMING

Rather than apply sequentially for a series of approvals aligning with developmental stages of the SLIP, this application seeks approvals to authorise the construction, use, and operation of the Project which will progress / develop in stages over time. This enables a comprehensive assessment of the entire Project and is a more appropriate approach than piecemeal consenting of a series of stages. It will also provide necessary certainty from an investment and demand management perspective.

Broadly speaking, and as illustrated in Figure 2-2, it is anticipated the Project will be developed in three stages. The timing and division of works within the stages are indicative

[23] Identified within a Dunedin City Council Business Development Capacity Assessment 2022.

and, in the event that demand for the SLIP facilities varies from projections, the construction of the stages will be delayed or brought forward as necessary. This approach ensures that construction remains financially feasible, and resources are efficiently allocated.

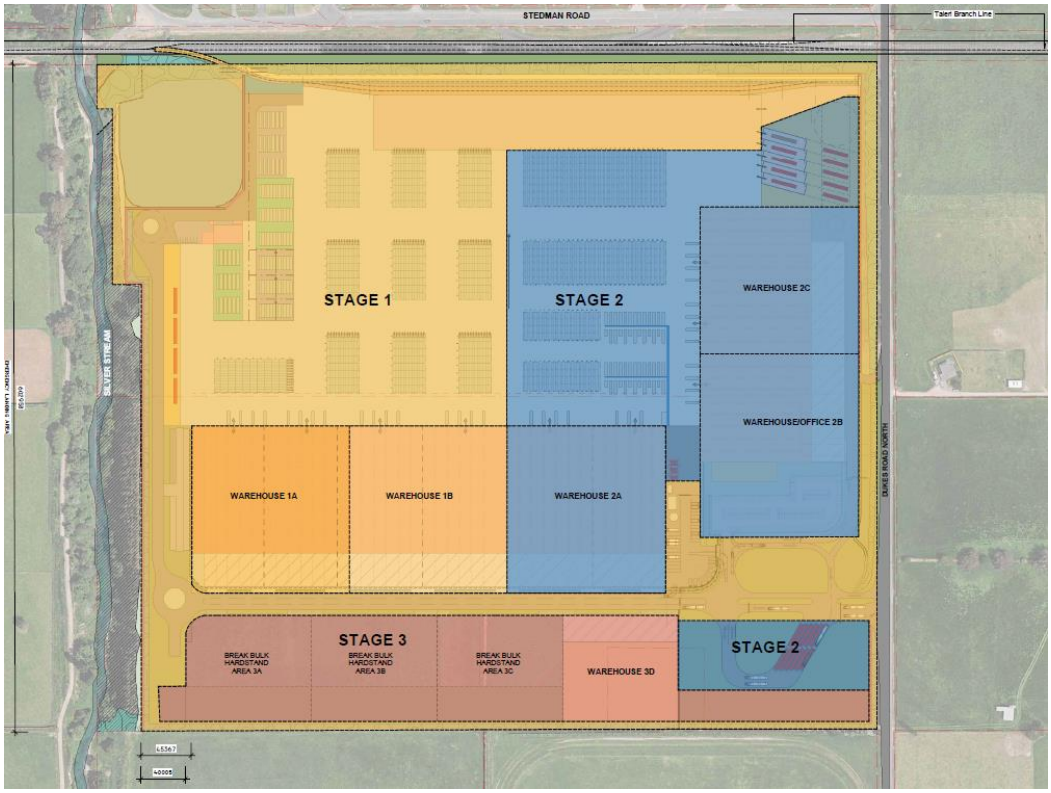


Figure 2-2: Proposed Staging of Site Development

Construction is anticipated to begin in 2027 once the necessary approvals for the development have been acquired and any pre-commencement of works activities completed. For reference purposes to inform assessment of the Application, it is anticipated the stages will be delivered within the following timeframes following the initial commencement of works:

- Stage 1 –1 to 3 years;
- Stage 2 - 3 to 5 years; and
- Stage 3 - 5 to 10 years.

While it is anticipated the development will occur with the above staging, works identified as being part of Stages 2 and 3 may advance earlier should demand for the SLIP logistics capacity increase or efficiencies identified in detailed design arise.

Refer to the Master Plans provided in **Part E** for further details on the indicative staging.

Indicatively, **Stage 1** will include:

- Remediation of all soils with identified contaminants that present a risk to human health and the environment in accordance with a Contaminated Site Management Plan ("**CSMP**") and Remedial Action Plan ("**RAP**");
- Clearance of the southern end of the Site, undertaking of Stage 1 earthworks, implementation of Stage 1 erosion and sediment controls to achieve design ground levels, and establishment of the Stage 1 stockpile area in the centre of the Site;
- Road widening and construction of the new intersection onto Dukes Road North;
- Construction of the emergency egress onto Dukes Road North;
- Construction and use of the eastern and southern roads of the internal road network and associated parking and southern road exchange area;
- Construction of the eastern extent of the western stormwater swale and stormwater attenuation pond spillway to Silver Stream located within the Site boundaries, and construction of the eastern and northern stormwater swales around the Site boundaries and eastern discharge spillway to Silver Stream;
- Landscaping of the northern Site boundary and eastern Site boundary;
- Weed management and planting associated with natural character enhancement along the bank of the Silver Stream located within the Site boundaries;
- Construction and operation of the stormwater attenuation pond in the south-west corner of the Site and reticulated stormwater network for Stage 1 areas;
- Construction of the onsite water supply network for Stage 1 areas;
- Construction of the onsite wastewater network for Stage 1 areas and construction of a new connection to the public wastewater line on Odlins Place;
- Construction of the northern, western and southern acoustic walls and construction of the eastern acoustic bund;
- Construction and use of Warehouses 1A and 1B, including associated yards and canopies;
- Construction and use of the southern concrete pad for container storage;
- Construction and operation of the container inspection, wash, upgrading and repair station areas;

- Construction and operation of the rail siding; and
- Establishment of external lighting associated with the Stage 1 operation and circulation areas of the Site.

Figure 2-3 below illustrates the proposed Stage 1 activities.



Figure 2-3: SLIP Master Plan Stage 1

Indicatively, **Stage 2** will include:

- Clearance of the northern end of the Site, undertaking of Stage 2 earthworks, including use / clearance of the Stage 1 stockpile, and implementation of Stage 2 erosion and sediment controls to achieve design ground levels;
- Construction and use of the northern roads of the internal road network and associated parking areas and northern road exchange area;
- Extension of the onsite reticulated stormwater network for Stage 2 areas;
- Extension of the onsite water supply network for Stage 2 areas;
- Extension of the onsite wastewater network for Stage 2 areas;
- Construction and use of Warehouses 2A, 2B and 2C including associated yards and canopies;
- Construction and use of 1,000m^2 of ancillary offices;
- Expansion of the container concrete pad for increased container storage; and
- Establishment of external lighting associated with the Stage 2 operation and circulation areas of the Site.

Figure 2-4 below illustrates the proposed Stage 2 activities.

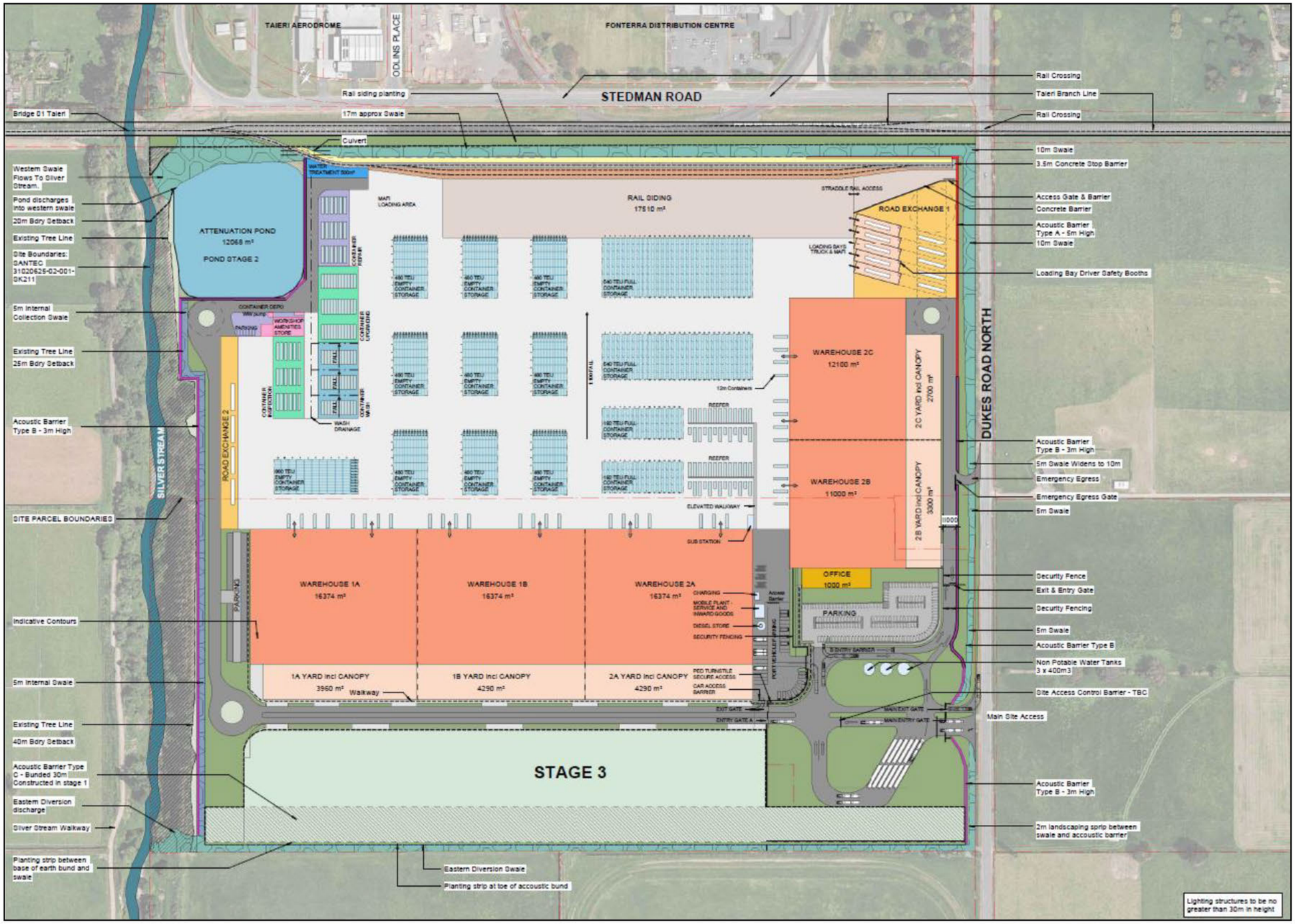


Figure 2-4: SLIP Master Plan Stage 2

Indicatively, **Stage 3** will include:

- Clearance of the eastern side of the Site including removal of the acoustic bund, undertaking of Stage 3 earthworks and implementation of Stage 3 erosion and sediment controls to achieve design ground levels;
- Construction and use of the north-eastern truck waiting bay area;
- Extension of the onsite reticulated stormwater network for Stage 3 areas;
- Extension of the onsite water supply network for Stage 3 areas;
- Extension of the onsite wastewater network for Stage 3 areas;
- Construction and use of Warehouse 3D including associated yard and canopy;
- Construction of break bulk hardstand areas 3A, 3B and 3C; and
- Establishment of external lighting associated with the Stage 3 operation and circulation areas of the Site.

Figure 2-5 below illustrates the proposed Stage 3 activities.

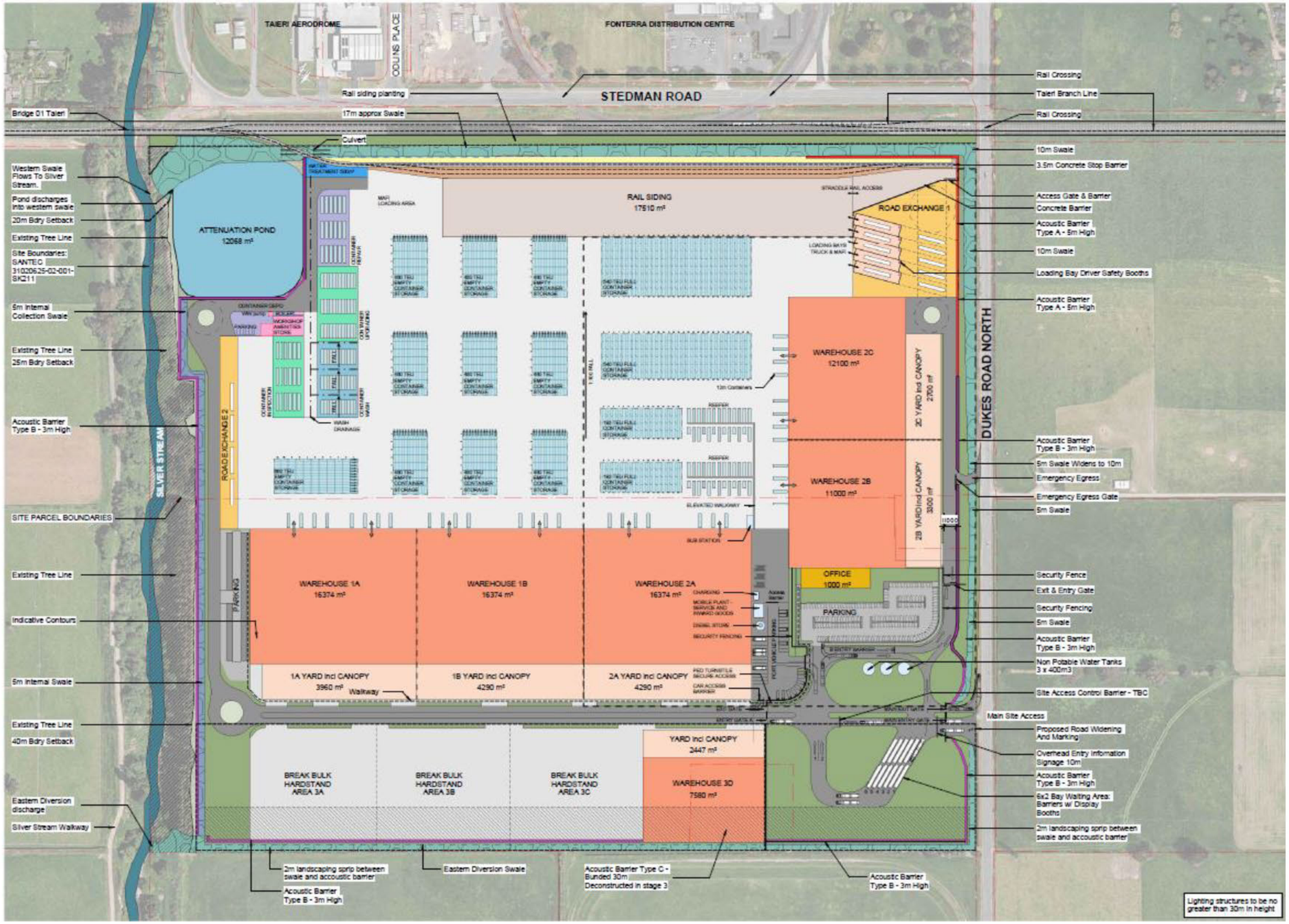


Figure 2-5: SLIP Master Plan Stage 3

2.5 CONSTRUCTION SEQUENCE

Construction activities are planned to occur during standard daytime working hours. Night-time construction is not proposed, however, during certain activities such as large concrete pours, early morning starts may be required. All works will be managed to minimise noise, disruption, and potential effects on neighbouring and nearby properties.

Establishment of the Site will occur at the commencement of Stage 1 and will include utilisation of the existing buildings at 270 and 274 Dukes Road North as project offices, construction of laydown areas, establishment of construction fencing and hoarding, and establishment of construction site access including a stabilised entrance and wheel wash facilities.

Temporary traffic management measures will be established as required and are primarily anticipated to be required for the construction of the new intersection on Dukes Road North and associated road widening.

2.6 SITE REMEDIATION

The Detailed Site Investigation ("**DSI**") (Environmental Consultants Otago, 2026) identified three Hazardous Activities and Industries List ("**HAIL**") sites on the Site which require remediation. Environmental Consultants Otago has prepared a RAP and CSMP for the Site. The RAP and CSMP will be submitted to DCC for certification prior to the commencement of works (in accordance with proposed conditions of consent).

The RAP and CSMP have been developed to set out responsibilities for soil handling, management and disposal procedures and controls in relation to contaminated soils on the Site.

Further HAIL sites identified by Environmental Consultants Otago do not require remediation as the contaminant concentrations at these locations did not exceed the commercial / industrial human health guidelines however disturbance of these locations is still required to be appropriately managed by the RAP and CSMP.

A Site Validation Report will be prepared and provided to the DCC at the completion of the remediation works to confirm the details of the completed works, including the remediation strategy that has been applied and a summary of the outcomes of the works.

2.7 SITE CLEARANCE AND EARTHWORKS

The staged development of the SLIP will involve the progressive clearance, earthworking and redevelopment of the Site across all three development stages (refer to Table 2-1 below). By the completion of Stage 3, all existing buildings and roading on the Site will have been

cleared as well as the majority of the site vegetation which currently primarily consists of exotic grazed pasture and shelter belts. The extent of earthworks is depicted in full on the earthworks plans provided in **Part E**.

Table 2-1: Proposed Earthworks Areas and Volumes and Staging

Stage	Area (m^2)	Cut (m^3)	Topsoil Strip (m^3)	Fill (m^3)	Net (m^3)
Stage 1	284,300	99,100	85,300	99,300	85,100
Stage 2	128,300	31,900	32,000[24]	26,800	37,100
Stage 3	48,400	40,600	8,900[25]	1,100	48,400
Total	**420,300**	**120,000**	**126,100**	**78,200**	**168,100 <cut>**

Based on the current earthworks plans, earthworks will not require dewatering. However, should detailed design identify a need for deeper excavations, appropriate consents will be sought separately from ORC (outside of the FTAA process) for any dewatering and / or diversion activities required.

All earthworks will implement an Erosion and Sediment Control Plan in general accordance with best practice standards. Appropriately sized temporary sediment retention ponds will be established along with standard erosion and sediment controls including silt fences, clean water bunds, cut-off drains and dirty water bunds to prevent the discharge of sediment into Silver Stream. The location of proposed erosion and sediment controls are depicted on the Concept Erosion and Sediment Control Plans (provided in **Part E**). An Erosion and Sediment Control Plan will be prepared prior to commencement of each stage of earthworks detailing the full extent of ESCP measures, and submitted to DCC for certification.

Underground infrastructure services will also be established during earthworks. Details of these services are described in Sections 2.19, 2.21, and 2.22.

[24] Topsoil for Stage 2 excludes stockpile area as this is accounted for in Stage 1 volumes.

[25] Topsoil for Stage 3 excludes bund area as this is accounted for in Stage 1 volumes.

Demobilisation of construction activities including offices, temporary service connections, laydown areas, stockpiles and erosion and sediment control measures will occur progressively with the completion of the development stages.

2.7.1 Lizard Salvage

The salvage and relocation of tussock skink will be required at the Site prior to the commencement of earthworks, but are not proposed as part of this Application. SLPL will apply for a separate Wildlife Act Authority to carry out the lizard salvage and relocation activities which will require the preparation and implementation of a Lizard Management Plan. The Lizard Management Plan will set out actions for the safe removal of lizards from the Site. Further detailed of the requirements of the Lizard Management Plan are detailed in Section 6.6.2.

2.7.2 Clearance of Holmhead Farm

The proposed works will involve the removal of all buildings and visible archaeology relating to the onsite archaeological site 'Holmhead Farm', described further in Section 3.18, as well as any archaeological features located within the depth of excavations for the SLIP. These works will be undertaken in accordance with Archaeological Authority 2026-362. Holmhead Farm is not identified as a heritage / archaeological feature under the District Plan and therefore no permissions are required under the District Plan for the works.

The clearance and excavation work within the marked extent of Holmhead Farm, as shown in Figure 2-6, will be actively monitored by a registered archaeologist following best practice recording and reporting procedures.



Figure 2-6: Extent of Holmhead Farm Requiring Archaeological Monitoring

Accidental discovery protocols will be followed for clearance and excavation works across the remainder of the Site (outside the marked extent of Holmhead Farm).

2.7.3 Stage 1 Clearance and Earthworks

Initial Site development will commence with clearance of the southern area of the Site and establishment of erosion and sediment controls referred to previously. Following this, earthworks will commence and will include the construction of the Stage 1 stormwater attenuation pond.

Cut activities will commence from the south-western corner of the Site and progress in a northerly direction. Suitable soils from the cut will be used as fill to form both a temporary grassed acoustic bund along the eastern Site boundary (discussed further in Section 2.19) and stockpiled in the centre of the Site (forming the Stage 1 stockpile) for utilisation during the Stage 2 earthworks. The bund will remain in place until later stages of development, at which point the area will be prepared for the construction of Stage 3 and the bunded area will be reinstated with grass.

The maximum volume of cut-to-waste is estimated to be 88,000 m^3 (187,400 m^3 cut and 99,400 m^3 fill) with excess cut to be stockpiled on the Site before being loaded onto trucks

for removal. Export movements are estimated to be 6-8 truck units per hour for the duration of the cut activity. Maximum open unfilled areas will be 2 hectares (200 m x 100m) in size.

Following the cut, imported hardfill stockpiled on the Site will be placed from the south-western corner in a northerly direction at a minimum depth of 300 mm. On completion of the first layer of hardfill, additional hardfill will be placed, stabilised and compacted to achieve sub-base levels. Construction of pavements, service areas, building foundations, the rail siding and main site access associated with Stage 1 will follow the establishment of the sub-base levels.

The Stage 1 earthworks will include excavation and establishment of the eastern and northern stormwater swales and the permanent eastern discharge outlet and spillway into Silver Stream. It will also include excavation and establishment of the extent of the western stormwater swale and the extent of the stormwater attenuation pond spillway located within the Site. All earthworks will include associated erosion protection measures. Further details of the stormwater assets are described in Section 2.20.

2.7.4 Stage 2 Clearance and Earthworks

Stage 2 earthworks will follow a similar methodology to the Stage 1 earthworks and will commence with clearance of the northern area of the Site and the establishment of erosion and sediment controls referred to previously.

Cut activities will commence from the south-western corner of Stage 2 and progress northerly across the Site. The maximum volume of cut-to-waste is estimated to be 37,100 m^3 (63,900 m^3 cut and 26,800 m^3 fill) with excess cut to be stockpiled on the Site before being loaded onto export trucks for removal. Export movements are estimated at 6-8 truck units per hour for the duration of the cut activity. The stockpile formed as part of Stage 1 earthworks will be utilised for fill during the Stage 2 works. Maximum open unfilled areas will be 2 hectares (200 m x 100 m) in size.

Following the cut, imported hardfill stockpiled on the Site will be placed from the south-western corner in a northerly direction at a minimum depth of 300 mm. On completion of the first layer of hardfill, additional hardfill will be placed, stabilised and compacted to achieve sub-base levels. Construction of pavements, service areas and building foundations associated with Stage 2 will follow establishment of the sub-base levels.

2.7.5 Stage 3 Clearance and Earthworks

Stage 3 earthworks will follow a similar methodology to the Stage 1 and 2 earthworks and will commence with clearance of the eastern area of the Site and establishment of erosion and sediment controls referred to previously.

The works will involve clearance of the eastern temporary acoustic bund. The topsoil bund and general topsoil strip will be screened and exported offsite to a suitable location. Cut activities will commence from the south-western corner of Stage 2 and progress northerly across the Site. The maximum volume of cut-to-waste is estimated to be 48,400m^3 (49,500m^3 cut and 1,100m^3 fill) with excess cut to be stockpiled on the Site before being exported offsite to a suitable location. Export movements are estimated at 6-8 truck units per hour for the duration of the cut activity. Maximum open unfilled areas will be 2 hectares (200 m x 100 m) in size.

Following the cut, imported hardfill stockpiled on the Site will be placed from the south-western corner in a northerly direction at a minimum depth of 300 mm. On completion of the first layer of hardfill, additional hardfill will be placed, stabilised and compacted to achieve sub-base levels. Construction of pavements, service areas and building foundations associated with Stage 3 will follow establishment of the sub-base levels.

2.8 SITE ACCESS

Primary site access will be provided via a new vehicle crossing and intersection at the eastern end of the Site frontage onto Dukes Road North. A secondary emergency egress will be provided further west near the middle of the Dukes Road North Site frontage.

The eastern intersection will be the only access point to the Site and will accommodate light and heavy vehicle movements, including staff and service vehicles. Road widening of Dukes Road North around the intersection will be undertaken and new road markings painted to construct the intersection. Left- and right-turn access will be provided for from Dukes Road North, and the entry road will be two lanes wide for access to avoid queuing in the road reserve. An entry gate will be installed at the Site entrance to secure the Site during nighttime / low operational hours.

From the entry gate, vehicles can be directed to the designated waiting bay, loading and unloading areas, or warehouse facilities as required. Entry control gates will be located further within the Site on the internal road network to control access to the operational areas while avoiding queuing onto Dukes Road North.

The Dukes Road North intersection will be the main point of egress from the Site with a left-turn slip lane to be constructed within the Dukes Road North corridor.

The secondary emergency egress will provide alternative egress during emergency situations. This access will be gated and secured to prevent everyday use, maintaining site safety and access control while still allowing immediate opening in the event of an emergency.

2.9 INTERNAL ROADING AND PARKING

The internal road network has been designed to generally follow the external boundaries of the Site, facilitating access to all areas of the Site. The western interior of the Site is reserved for container facilities, stacking and movement and no formal road network is therefore provided in this area.

Upon entering the Site, an overhead gantry will guide vehicles, directing them to the appropriate internal zones based on operational requirements. Trucks will turn left into the designated waiting zone with 12 waiting bays where booths and walls will control access and direct vehicles to their assigned areas. From the waiting zone, trucks may proceed to:

- Lane 1 / Entry Gate A for access to the eastern warehouses and break bulk hardstand areas and the Road Exchange Area 2 for container transfers; or
- Lane 2 / Entry Gate B for access to the northern warehouses and the Road Exchange Area 2 for container transfers.

The internal access roads have been designed to accommodate truck manoeuvring with forward-in forward-out access provided to the warehouse yards and turning areas provided at the road exchange areas. Trucks will exit the Site via the internal circulation roads returning to the main access and exiting left onto Dukes Road North.

Other vehicles (staff, visitors, port vehicles, contractors, etc) will also enter the Site via the main access. Controlled access will be maintained through a barrier and turnstile system at the facility's entry point, allowing staff, visitors, and contractors to safely move between the office area and the warehousing zone. Internal parking will be provided in three locations across the Site: the main 'office' carpark outside the office area at the entrance to the Site; a port vehicle parking area adjacent to Warehouse 2A; and at the container workshop area. Light vehicles will exit the Site via the main access onto Dukes Road North.

2.10 RAIL SIDING

A key component of the SLIP is connection to the existing KiwiRail infrastructure located along Stedman Road. The Project will leverage this network to facilitate the efficient movement of containers between Port Chalmers and the SLIP, supporting an integrated and sustainable freight system.

An extension of the existing rail siding track will be constructed to bring the line directly into the Site. The siding connects from the points of the branch line on Stedman Road, descending onto the Site and extending toward the northern end of Dukes Road North.

Positioning the rail siding as far to the northwest corner as practicable allows the entire siding area to achieve an almost level grade, enhancing operational efficiency and accessibility for container handling.

Figure 2-7 provides a focused concept plan for that area of the Site in which the rail-siding and rail-siding access will be located (i.e. the western side of the Site). As shown, the rail-siding access point is from Stedman Road, with the extended siding flowing directly into the SLIP. The figure also highlights the full extent of the siding's reach into the Site. Container handling machinery will be used to transfer and position containers onto the trains, supporting efficient intermodal operations.

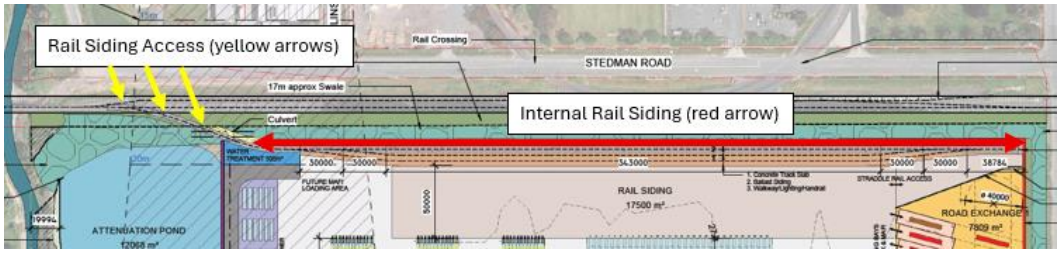


Figure 2-7: Concept Plan Showing Location and Context of the Rail Siding

2.11 LOADING AND UNLOADING AREA

Adjacent to the rail siding, a 50-metre-wide hardstand pad will be developed to accommodate loading and unloading activities associated with rail operations. This area will serve as the primary interface between the rail network and onsite logistics.

2.12 ROAD EXCHANGE AREAS

Two road exchange areas (shown on Figure 2-1) will serve as a key operational zone for the transfer of containers between road and onsite storage or handling areas. The exchange areas will accommodate truck movements associated with the offloading of full containers and the collection of empty containers for delivery to other users or customers.

The southern Road Exchange 2 area will be established during Stage 1 and will cover an area of approximately 2,500 m^2. It will include one designated lane for loading / unloading. Drivers will disembark at gated booths, while side loaders perform container loading and unloading operations.

The northern Road Exchange Area 1 will be established during Stage 2 and will cover an area of approximately 8,000 m^2. It will include five designated lanes for loading / unloading and waiting spaces. Drivers will disembark at gated booths, while straddle carriers perform container loading and unloading operations.

2.13 CONTAINER PAD

The container pad is a large, fully concreted area of approximately 120,000 m^2 including the container servicing facility but excluding the rail siding and road exchange areas. This pad will form the central operational area of the SLIP, supporting efficient stacking, handling, and movement of containers onsite.

The southern end of the pad will be constructed during Stage 1 works and will have capacity for the storage of 4,980 containers, excluding the container servicing facility. The northern end of the pad will be constructed during Stage 2 works and will provide storage for an additional 1,464 containers. Containers will be stacked up to six high, equating to an approximate stacking height of 17.4 m.

A Gazette Notice[26] registered on Record of Title OT3C/897 (provided in **Part H**) pursuant to the Public Works Act Amendment Act 1935 establishes a height plane limitation for any building, pole, mast, structure or vegetation to 1/15th of the distance from the nearest part of the boundary to the Taieri Aerodrome. The nearest part of the aerodrome boundary is 90 m west from the Site and creates a more restrictive regime than the Dunedin District Plan's 1:20 Obstacle Limitation Surfaces ("**OLS**") for the Taieri Aerodrome which are also located over the Site. This restricts the height of the southwestern container stack, container repair and upgrading areas of the container depot. Accordingly, stack heights and vegetation will be managed depending on the distance to the aerodrome boundary to comply with the limits imposed by the Gazette Notice (as reflected in Figure 2-8) and the District Plan OLS.

[26] GN X9781.

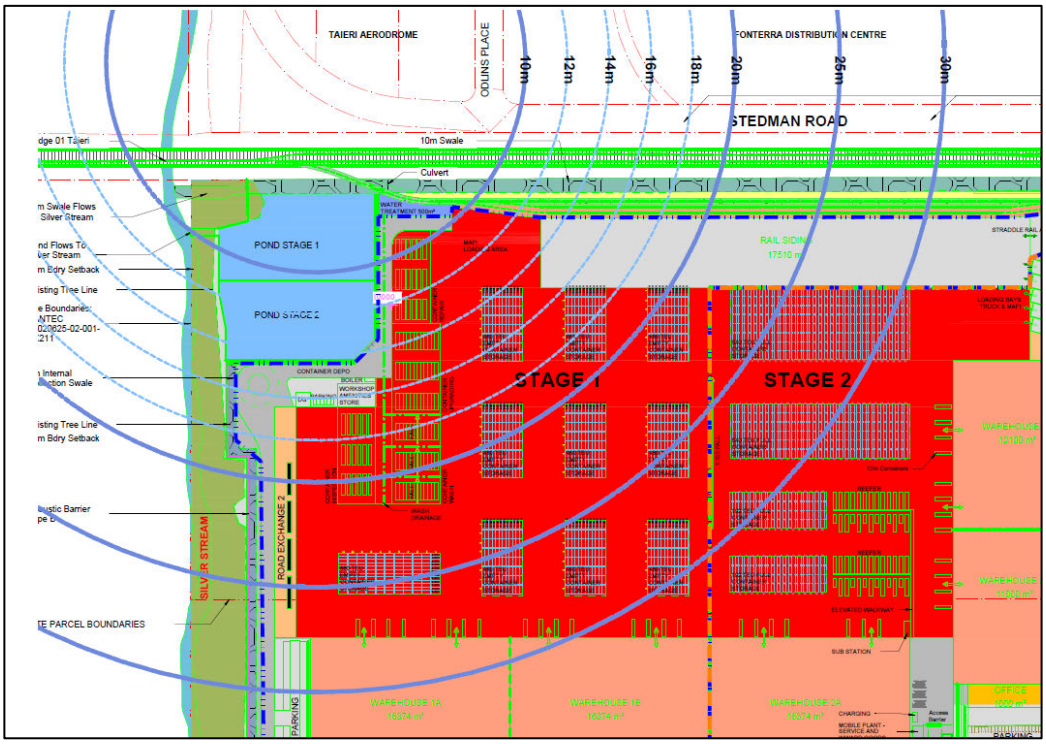


Figure 2-8: Gazette Notice Height Limitations (in blue)

A dedicated section in the bottom right-hand corner of the pad will be allocated for refrigerated container storage ‘reefers’, equipped with the necessary power connections to maintain temperature-controlled freight.

2.13.1 Container Servicing Facility

The container servicing facility will be located on the south-west corner of the container pad. This area will accommodate container washing, inspection, repairs, and any necessary upgrades to ensure containers are ready for loading and dispatch.

All wash water from this facility will be collected, treated onsite through a dedicated water treatment system, and then discharged to the wastewater network, ensuring no direct discharge to the stormwater system as described further in Section 2.22.

These washing facilities are critical for meeting biosecurity requirements, including those set by the Ministry for Primary Industries, which require all containers to be thoroughly cleaned before being transported for loading. Maintaining these standards helps to ensure biosecurity compliance and support the efficient operation of the SLIP.

2.14 ONSITE POWER DISTRIBUTION

Aurora Energy who are the local power supply network operator has confirmed a Point of Supply (i.e. power connection) with network capacity of 2.1 MVA is available for Stage 1 of the development to the power supply network (refer to **Part F**), with approval of the connection subject to addressing technical, legal and commercial requirements. Connection of future development stages of the Project will be assessed at a later date.

A substation will be established on the Site, near the refrigerated container storage on the container pad, to connect to the Aurora high voltage network. Onsite, a low voltage network will be established to provide power across the Site.

2.15 SECURITY INFRASTRUCTURE

As an inland port, access to the Site will be controlled to ensure the security is maintained.

The main vehicle access will include a gate that will be closed outside of standard business hours. During standard business hours, vehicles will be able to enter the Site freely but access to any operational areas of the Site will be controlled by internal roading gates.

The emergency egress to the west will be gated at all times and only opened during an emergency.

As construction of the SLIP will occur in stages, security fencing for the Site will be established in stages as well. The proposed acoustic walls will assist with perimeter control requirements for the SLIP.

Security lighting and CCTV security cameras will be installed at all access points to the SLIP as well as strategically along the Site boundaries. Security lighting will be directed into the Site and will be motion-activated.

2.16 WAREHOUSE AREAS

The warehouse areas are designed to provide secure and efficient storage for containers and associated goods within the SLIP. These facilities will be developed progressively, with space made available for lease or sale to customers as demand increases. The layout comprises three main warehouse zones which will be developed in conjunction with the development stages.

Warehouses 1A, 2B, 2C and 3D will have a maximum height of 14m. Centrally located warehouses 1B and 2A will have a maximum height of 18 m to allow for potential future use / construction of these warehouses as cold stores.

The warehouses will be constructed with a consistent mid-dark tone colour scheme, being Resene Colour 'Grey Friars' or similar with a Light Reflectance Value ≤30%. Warehouses with precast walls will have exposed aggregate finishes with dark oxides similar to Allied Concrete Dunedin exposed range "Spice". Warehouse roofs will be lighter in tone dur to internal heating issues, using Resene Colour 'Gull Grey' or similar, with a LRV of approximately 48%.

2.16.1 Stage 1 Warehousing

Stage 1 warehousing will comprise Warehouses 1A and 1B centrally located within the Site (refer to Figure 2-2). Both warehouses sit adjoining the main container pad and are designed to operate under large canopies that extend over the buildings to provide sheltered areas for loading and unloading, as well as to keep containers dry. The floor areas of the Stage 1 warehousing are provided in Table 2-2.

Table 2-2: Stage 1 Warehousing Floor Areas

	Approximate GFA	Approximate Yard Area
Warehouse 1A	16,374 m²	3,960 m²
Warehouse 1B	16,374 m²	4,290 m²

The warehouses will be accessed directly from the main access road, which links to the Site entrance on Dukes Road North. Trucks will pull up beneath the canopies to deliver containers for storage or onward movement.

2.16.2 Stage 2 Warehousing

As described in Section 2.4, Stage 2 works, including construction of Stage 2 warehousing, will commence once logistics demand for expansion of the SLIP arises.

This second warehouse cluster, consisting of Warehouses 2A, 2B and 2C, is expected to be delivered in stages, providing flexibility to scale operations in response to customer demand. The warehousing will function in the same manner as Warehouses 1A and 1B, offering additional large-format storage and operational space.

The warehouses are intended to handle food-grade products such as milk powder, cheese, and other perishable goods. Accordingly, these warehouses will be fully enclosed to meet food storage standards, while the canopy areas will offer a covered transfer point between trucks and the warehouse interior.

Warehouse 2A will sit immediately north of Warehouse 1B, centrally positioned within the Site, similar in scale and design to Warehouses 1A and 1B. Warehouses 2B and 2C will be located further north, parallel to Dukes Road North, and accessed via the access road on the outer side of the canopy, maintaining smooth circulation and minimising congestion across the Site. The floor areas of the Stage 2 warehousing are provided in Table 2-3.

Table 2-3: Stage 2 Warehousing Floor Areas

	Approximate GFA	Approximate Yard Area
Warehouse 2A	16,374 m²	4,290 m²
Warehouse 2B	11,000 m²	3,300 m²
Warehouse 2C	12,100 m²	2,700 m²

2.16.3 Stage 3 Warehousing

As described in Section 2.4, Stage 3 works, including construction of Stage 3 warehousing, will commence once logistics demand for expansion of the SLIP arises.

Stage 3 warehousing will consist of one warehouse unit, 3D. This building will be located on the eastern side of the Site and will be constructed in the final stage of development. This warehouse will include a yard canopy providing covered operational space for loading and unloading activities.

Access to the warehouse will be via the main internal road that connects directly to the Site entrance. The floor areas of the Stage 3 warehousing are provided in Table 2-4.

Table 2-4: Stage 3 Warehousing Floor Areas

	Approximate GFA	Approximate Yard Area
Warehouse 3D	7,580 m²	2,447 m²

2.17 BREAK BULK HARDSTAND AREAS

Three break bulk hardstand areas (identified as 3A, 3B and 3C) will be constructed on the eastern side of the Site. These break bulk hardstand areas will be utilised to store and transfer cargo that is large, heavy, or irregularly shaped.

With break bulk, goods are transported in individual pieces, crates, bags, drums, or on pallets, requiring specialized lift-on / lift-off handling.

A dedicated roundabout and truck turning area will be located at the south-eastern end of the Site near Break Bulk Hardstand Area 3A, enabling efficient maneuvering for vehicles after loading or unloading and ensuring safe circulation around the precinct and the minimisation of congestion.

2.18 MACHINERY AND EQUIPMENT

Machinery and equipment will be stored in the area located between Warehouses 2A and 2B. This includes straddle carriers, forklifts, and associated handling gear. All machinery will be serviced and maintained onsite, within close proximity to the storage area to ensure operational efficiency and minimise downtime.

Primary container related machinery that will be used onsite will comprise:

- Straddle carriers;
- Empty container handlers; and
- Forklifts (including reach stackers) and terminal tractors.

2.18.1 Straddle Carriers

Straddle carriers, as illustrated in Figure 2-9 will primarily be used for lifting, stacking, and transporting shipping containers within the Site. They enable efficient movement of containers between storage areas, loading bays, and transport vehicles without the need for cranes. These machines operate within the designated hardstand areas, providing flexibility and efficiency in managing onsite logistics and container handling operations.



Figure 2-9: Example of a Straddle Carrier Machine

2.18.2 Forklift

Forklifts will be used for the handling and movement of containers, pallets, and general freight within the Site. They are essential for day-to-day operations, supporting the transfer of goods between different areas.

2.18.3 Empty Container Handlers

Empty container handlers, as shown in Figure 2-10, will be used onsite to lift, stack, and relocate empty shipping containers as part of routine storage and logistics operations. These machines are designed to efficiently manage container movements within the yard, supporting orderly container stacking, optimising space, and ensuring smooth operational flow across the Site.



Figure 2-10: Example of an Empty Container Handler Machine

2.19 NOISE ATTENUATION

Noise mitigation measures to manage the noise effects of the SLIP are proposed as follows:

- Site layout – The closest residential dwellings are located to the north and east of the Site. Resultantly, the warehouse buildings have been located closest to the northern and eastern boundaries to utilise their built form for noise screening. The rail siding and container pad are located to the south and west away from these nearest receivers.
- Enclosed loading areas – Enclosed loading areas ("tunnels") are provided within the warehouses to reduce external loading; and
- Noise barriers – Noise barriers in the form of acoustic walls and an acoustic bund are proposed around the perimeter of the Site to reduce noise emissions. These are discussed further below.

During Stage 1 works, permanent acoustic walls (precast noise walls) will be installed along the northern, western, and southern boundaries of the Site. These walls will be constructed with a minimum surface mass of 12kg/m^2 and no gaps (aside from water flow flaps discussed below) and will comprise of 'Type A' and 'Type B' acoustic walls:

- Type A: Will be 5 m high and located around the north-western corner of the Site; and

- Type B: Will be 3 m high and located along the eastern end of Dukes Road North as well as along the southern boundary of the Site.

Two sections of acoustic walls will be constructed with water flow flaps (flood relief flaps) along the bottom of the walls; the western section of the Type A wall along the Dukes Road North frontage and the Type B wall around the proposed stormwater attenuation pond. These hinged flood openings at the bottom of the walls will allow floodwaters to pass through during flood events. At all other times the flaps will remain closed thereby maintaining the acoustic performance of the walls.

A 3 m high temporary acoustic bund will be formed along the eastern boundary of the Site, utilising excess cut as described in Section 2.7.3. This bund will provide noise mitigation for properties east of the Site and will remain in place until construction of Stage 3 is commenced at which point the bund will be disestablished. In its place, the Type B acoustic wall along the northern boundary will be extended along the eastern boundary to continue to provide noise mitigation along with the establishment of the built form of Warehouse 3D.

2.20 ONSITE STORMWATER MANAGEMENT

The proposed onsite stormwater management layout is provided as Figure 2-11.

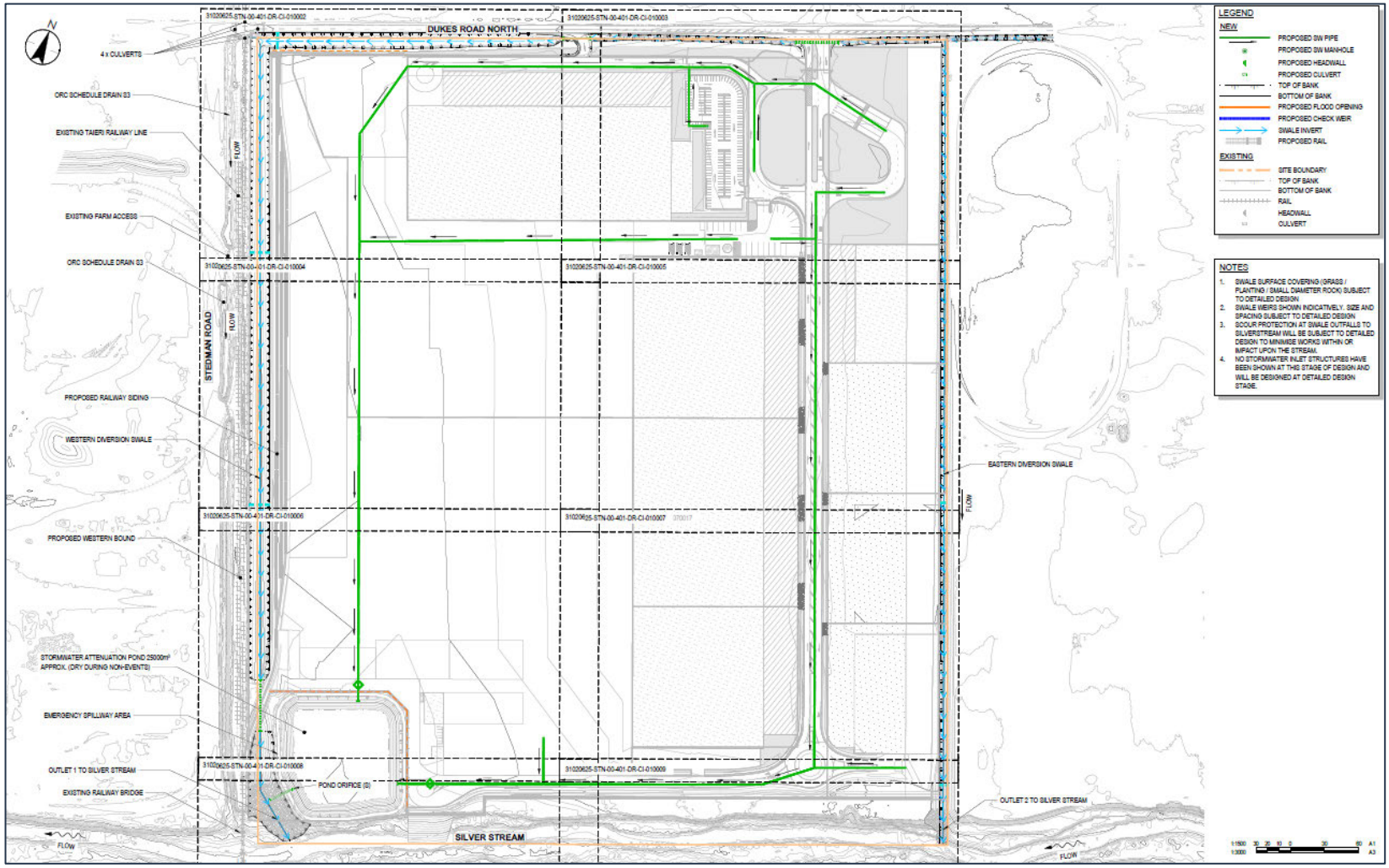


Figure 2-11: Proposed Stormwater Layout

Stormwater from paved areas and internal roadways will be collected and managed through an onsite network of drainage infrastructure adopting a centralised approach with capacity to pass the 10% Annual Exceedance Probability ("**AEP**") design rainfall runoff. The network will consist of two main trunk pipelines, pipes, catchpits, manholes and direct connections to a single onsite stormwater attenuation pond. Construction of the reticulated network will progress in alignment with the identified development stages for the Project.

The internal road network is designed to act as the secondary overland flowpath system to convey the 1% AEP design rainfall runoff to the stormwater attenuation pond.

The stormwater network will discharge into a 25,000m^3 stormwater attenuation pond located in the south-west corner of the Site to attenuate post-development site runoff to pre-development discharge rates for 1% AEP rainfall events. The stormwater attenuation pond will be constructed during Stage 1. The pond is designed to remain predominantly dry between rainfall events and to drain within 48 hours following major rainfall events.

The stormwater attenuation pond will discharge via two outlet orifices allowing for throttling of flows into a rock-lined spillway at the end of the western swale which will then discharge into Silver Stream. As an additional safety measure, the stormwater attenuation pond will be constructed to overtop to the west to pass over-design event flows into the adjacent western swale. The spillway and the receiving swale will be constructed with scour protection to protect Silver Stream from high velocity flows.

The network will utilise the following stormwater treatment systems to mitigate the effects on downstream water quality from stormwater runoff:

- Roadside catchpits and sumps will be installed across the Site to capture coarse grits, solid debris and natural litter;
- Gross Pollutant Traps or Universal Pollutant Traps (depending on which is deemed most suitable at detailed design from a stormwater engineering operations perspective) will be installed in each outlet discharging to the stormwater attenuation pond. The traps will capture suspended solids, metals, floating plastics and hydrocarbons from the stormwater flows prior to flows discharging to the stream, with the traps being maintained regularly to remove the trapped material and prevent its subsequent discharge downstream; and
- The reduced flow velocities of the stormwater attenuation pond will provide incidental opportunities for vertical infiltration of contaminants and nutrients as well as sedimentation settlement.

Runoff from the washbay is anticipated to be classified as conditional trade waste discharge and will not be directed to the stormwater network. Instead, a separate wastewater network will be constructed to treat and discharge the runoff as wastewater as described in Section 2.22 below.

At a high-level the construction of the stormwater network will progress in alignment with the identified stages for the Project, with the following stormwater infrastructure constructed during each development stage:

- **Stage 1**:
  - Construct stormwater attenuation pond, pond outlet, clean water diversion swales, treatment devices, and all other stormwater pipework and manholes included in Stage 1; and
  - Stub flange pipe work that intersects Stage 2 and 3 boundaries.
- **Stage 2**:
  - Remove stub flanges and connect to stormwater pipework from Stage 1 entering Stage 2; and
  - Construct all remaining stormwater pipework and manholes included in Stage 2.
- **Stage 3**:
  - Remove stub flanges and connect to stormwater pipework from Stage 1 entering Stage 3; and
  - Construct all remaining stormwater pipework and manholes included in Stage 3.

The stormwater treatment systems are not suitable for containing large-scale spills, therefore a Spill Response Plan will be established for the Site to clearly detail the steps to be taken in order to effectively manage any onsite spills.

The final alignment of stormwater infrastructure along the northern and eastern boundaries will consider the limited radius constraints posed by the rail siding. Coordination with KiwiRail will ensure that any drainage works impacting or adjacent to rail infrastructure do not compromise their assets, with current agreements indicating no anticipated issues.

2.20.1 Flood Mitigation

The development involves raising onsite ground levels which will displace ponding of floodwaters on the Site. Mitigation of the flood displacement is proposed through construction of new diversion swales to divert overland flows around the boundaries of the Site. The design of the flood mitigation is intended to ensure no increase in peak flood flow

passing downstream during 1% AEP events. In case of larger events, the swales are designed to overtop onto the Site ensuring the flood capacity of the Site in the wider catchment is maintained.

The swales along the southern and eastern boundaries of the Site, as well as the eastern end of the Site frontage onto Dukes Road North will be 5 m wide. The Dukes Road North swale will widen to 10 m along the western end of the frontage, and a 10 m wide swale will also be constructed along the western boundary of the Site, straddling the boundary with the adjacent KiwiRail corridor.

The eastern and western swales will discharge into two spillways into Silver Stream. Detailed design of the spillways will occur during detailed design however this will likely require works within Silver Stream as described in Section 2.21.

The swales positioned around the Site's northern, eastern, and western boundaries may be constructed with check dams to increase attenuation and culverts to pass the vehicular entrances off Dukes Road North and the railway siding bifurcation. It is anticipated that the check dams and culverts will be constructed with small aprons for scour protection. The swales will be designed to overtop onto the Site in high rainfall events (approximately 2% AEP events) allowing water to flow and pond onto the Site in a controlled manner, avoiding increasing flooding risk to neighbouring properties from the displaced floodwaters.

As described above in Section 2.19, the proposed permanent acoustic walls along the western end of the Dukes Road North frontage and around the proposed stormwater attenuation pond will include hinged water flow flaps (flood relief flaps) at the base of the walls. During flow events, the flaps will hinge open allowing for overland flows to pass underneath the walls.

Diverting the external stormwater around the Site provides flood protection for the Site and has the benefit of avoiding mixing the 'clean' stormwater with internal stormwater that may contain contaminants or pollutants (and requires treatment). This ensures the treatment and attenuation of internal flows is efficient, improving the general water quality of stormwater discharge from the Site.

In flood events larger than the 1% AEP event, the stormwater attenuation pond will spill over a controlled spillway near the southwest corner of the pond. Silver Stream will always be flowing strongly when the Site's stormwater pond spillway is active however the spillway and the receiving swale (between the pond and the railway) will have scour protection provided (rock or possibly localised use of concrete) so that the majority of the energy is dissipated before joining the Silver Stream at a shallow gradient. The details of the spillway, scour protection and the geometry of the confluence with Silver Stream near the railway bridge will

be progressed in detailed design to provide a stable combined system whilst minimising works in the prevailing wetted bed of Silver Stream.

2.21 STREAM WORKS

Construction of the western and eastern stormwater spillways will require works within the northern bank of Silver Stream. Construction of the eastern swale may also require works within the bed of Silver Stream (as shown on the Master Plans and to be confirmed during detailed design).

The size of both spillways has been designed to minimise soil and vegetation disturbance within the extent of Silver Stream as far as practicable while ensuring the safe conveyance and discharge of stormwater from the eastern and western swales. Sediment and erosion controls will be utilised at all times for the works to minimise mobilisation of sediment, risk of erosion, and any potential effects on fish or aquatic ecology.

Both spillways will be lined with scour protection to reduce flow velocities and manage the ongoing risk of erosion and scour effects on Silver Stream.

Any works within the bed of Silver Stream will be undertaken in accordance with best practice standards. Any diversion of water to create a dry area for works will ensure water is kept within the existing extent of Silver Stream, fish passage is maintained, and no water take or damming is required.

2.22 WASTEWATER

The proposed onsite wastewater management layout is provided as Figure 2-12.



Figure 2-12: Proposed Wastewater Layout

It is proposed to construct a gravity wastewater network on the Site to manage wastewater generated by site occupancy and the container washbay (noting runoff from the washbay is anticipated to be classified as a conditional trade waste discharge).

It is proposed that the network will connect to the DCC reticulated wastewater network located on Odlins Place to the west of the Site. The location of this connection was proposed by DCC during initial consultation. Connection to the Fortex Pipeline (detailed further in Section 3.14.2) was discounted as an option due to the pipeline being privately owned and operated.

DCC has confirmed there is sufficient capacity in the reticulated network to provide for wastewater servicing subject to the following requirements:

- The first section of the DCC wastewater gravity network on Odlins Place, an existing DN150 pipe (approx. 130 m long), will need to be upgraded or the proposed rising main will need to be extended to discharge downstream of the DN150 pipe, into manhole FSM08601;
- Limiting of trade waste flows in heavy rainfall events; and
- Efforts to reduce wet weather flow from the Site of the SLIP.

The wastewater scheme will include the following elements:

- The gravity wastewater network will collect wastewater within the Site and convey it to a terminal pump station near the Site's low point. The gravity network will consist of wastewater mains, lateral connections and manholes, and has been designed to meet the design criteria specified in the DCC DCSD 2010 and NZS 4404;
- A separate wastewater system will be installed for the uncovered container washbay, the design of which will be completed in future design stages of the Project. The water is to be treated as wastewater due to the high potential for contaminants from the container washing. The system will consist of:
  - A container washbay which will be located at a local highpoint to limit its catchment into the trade waste;
  - A series of sumps collecting wastewater from the washdown area and discharging via gravity to a downstream pre-treatment device;
  - A centralised pre-treatment system with a Gross Pollutant Trap (2 mm stainless steel perforated catch sieves or similar) immediately downstream to capture pollutants which will be disposed of by a certified sucker truck handler to an

approved facility which can accept the material. The washbay area will be Ministry for Primary Industries compliant for waste and biohazard;

- Following treatment and separation processes, flows will drain to a below—ground attenuation tank via gravity;
- A pump station will pump the treated wastewater to three (3) attenuation tanks with a throttled outlet limiting wastewater flow that is able to be discharged into the Site gravity wastewater network. The design of the washbay pump station will be completed during detailed design; and
- An overland flow to the stormwater attenuation pond should the storage capacity be exceeded for large events above the 10% AEP RCP 8.5 2080-2100 design storm;

- The gravity network will then drain into the terminal wastewater pump station located on the south-western corner of the Site. The pump station will convey wastewater flows to the DCC wastewater network on Odlins Place via a pressurised wastewater rising main;
- The terminal pump station will have emergency storage volume (at dry weather flow conditions), and a standby pump facility. The design of the terminal pump station will be completed in future design phases of the Project; and
- A wastewater rising main to convey flows from the terminal pump station to the DCC wastewater network on Odlins Place:
  - The alignment of the rising main follows the internal road reserve around the stormwater attenuation pond, before crossing under the railway tracks and an ORC scheduled drain near the western SLIP boundary;
  - The crossing beneath the railway tracks will be installed via trenchless construction. The pipe crossing at the ORC scheduled drain can be installed via trenchless construction methods or alternatively via a pipe bridge; and
  - Downstream of the scheduled drain, the wastewater rising main will head north along Stedman Road, with an appropriate offset from an existing DCC wastewater pipe. The rising main will then turn onto Odlin's Place, before connecting into DCC wastewater manhole Unit ID FSM08600. The design of the wastewater rising main will be completed during detailed design.

Construction of the wastewater network will progress in alignment with the identified stages for the Project, with the following wastewater infrastructure constructed during each development stage:

- **Stage 1**:
  - The terminal pump station including the rising main connection offsite to Odlins Place;
  - The container washbay wastewater system;
  - The bulk of the gravity wastewater main pipelines; and
  - Wastewater connections to Stage 1 buildings.
- **Stage 2**:
  - The remaining section of the gravity wastewater main pipelines; and
  - Wastewater connections to Stage 2 buildings.
- **Stage 3**:
  - Wastewater connections to Stage 3 buildings.

2.23 WATER

The proposed onsite stormwater management layout is provided as Figure 2-13.

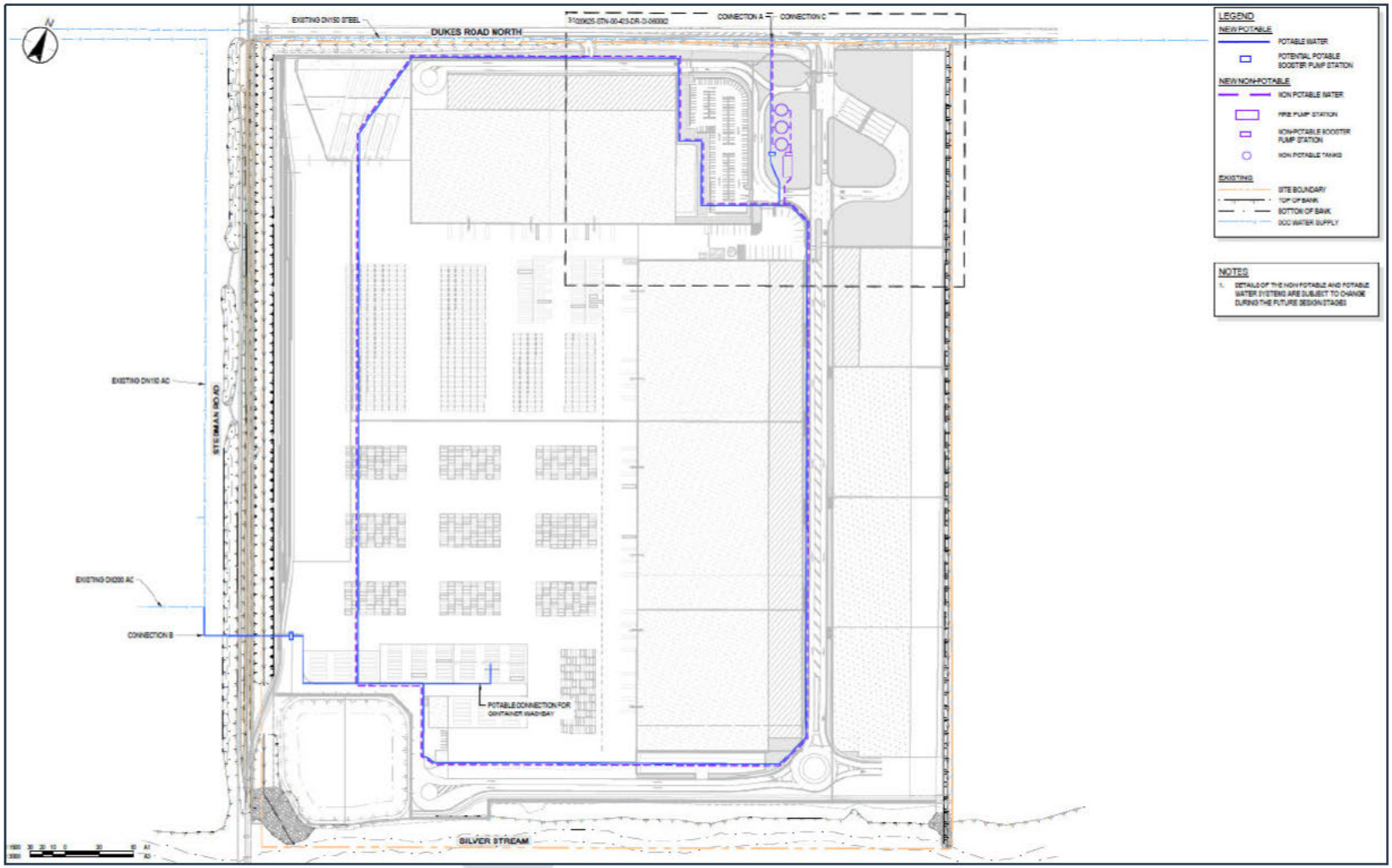


Figure 2-13: Proposed Potable and Non-Potable Water Supply Network Layout

The proposed development includes two water supply schemes:

> A potable supply scheme that will supply potable water to facilities required to support FTEs, site visitors and the container washbay; and

> A non-potable supply scheme that will capture rainwater from building roofs to improve sustainability and reduce the peak flow demand required from the DCC water network. The non-potable water scheme will supply water onsite for firefighting, general service water and provide a source of water for later development stages.

Construction of the internal reticulated network will progress in alignment with the identified development stages for the Project.

The water supply schemes have been designed to comply with all relevant regulatory and guidance documents. Under normal operation, the potable water network will be supplied from the DCC water network and the non-potable network supplied by rainwater from roof collection. DCC has confirmed there is sufficient capacity in the water network for normal operating scenarios.

However, it is anticipated temporary additional non-potable water demand on the DCC water network will occur during construction of the water supply schemes, periods of dry weather, and / or fire recovery. DCC has advised they have concerns over the capacity of the water network to service these temporary increases in demand. Further investigations will be undertaken at detailed design to identify and confirm a suitably water supply for the construction phase.

2.23.1 Potable Water Supply Scheme

The potable water supply scheme will include the following components, each with a backflow prevention device at or near the SLIP boundary with one or both connections in use at any particular time achieving resilience in the event that one watermain is temporarily shut down. Design details will be completed during detailed design:

> A new connection to the existing DCC water network DN150 steel watermain on Dukes Road North. This connection will serve as the primary supply connection for the Site; and

> A new connection to the existing DCC water network DN200 AC watermain on Stedman Road. This connection requires a trenchless railway crossing and trenchless crossing under the scheduled drain on Stedman Road. Approval for these works will be sought from ORC under the provisions of the ORC Flood Protection Management Bylaw.

Within the SLIP, the internal potable water scheme comprises:

- A new potable water ring main generally aligned around the Site perimeter following the internal road layout; and
- A new booster pump station located downstream of the connection to the water main on Dukes Road North to ensure sufficient water pressure is achieved.

Construction of the potable water supply scheme will progress in alignment with the identified stages for the Project, with the following potable water infrastructure constructed during each development stage:

- **Stage 1**:
  - Connections from the DCC water supply network to the potable networks;
  - The potable booster pump stations;
  - The bulk of the potable pressure main pipelines; and
  - The water supply connections to Stage 1 buildings.
- **Stage 2**:
  - The remaining sections of the potable water supply main pipelines to form the full ring mains; and
  - The water supply connections to Stage 2 buildings.
- **Stage 3**:
  - The water supply connections to Stage 3 buildings.

2.23.2 Non-Potable Water Supply Scheme

The non-potable water supply scheme has been designed to include a new connection to the DCC public network DN150 main along Dukes Road North fitted with a backflow prevention device at or near the SLIP boundary. The non-potable water supply scheme will include the following components with further design details to be completed during future design stages:

- Rainwater capture from building rooftops, with first flush diversion;
- Three storage reservoirs: two of the reservoirs sized for 400 m^3 with a third storage providing redundancy and periodic drainage and cleaning without reducing storage capacity;

- Non-potable water ring main generally aligned around the Site perimeter following the internal road layout. Fire hydrants will be installed using the minimum spacing required under SNZ PAS 4509:2008;
- A high-capacity pump station for firefighting flows including a diesel fire pump capable of delivering the required peak instantaneous flow for firefighting; and
- A booster pump station for everyday use downstream of the reservoirs ensuring sufficient capacity within the internal non-potable network.

Construction of the non-potable water supply scheme will progress in alignment with the identified stages for the Project, with the following non-potable water infrastructure constructed during each development stage:

- **Stage 1**:
  - Connections from the DCC water supply network to the non-potable networks;
  - The non-potable booster pump stations;
  - The non-potable fire pump station;
  - The non-potable water storage reservoirs;
  - The bulk of the non-potable pressure main pipelines; and
  - The non-potable rainwater collection systems for Stage 1 buildings.
- **Stage 2**:
  - The remaining sections of the non-potable water supply main pipelines to form the full ring mains; and
  - The non-potable rainwater collection systems for Stage 2 buildings.
- **Stage 3**:
  - The non-potable rainwater collection systems for Stage 3 buildings.

2.24 SIGNAGE

The effective operation of the SLIP relies on adequate signage to provide direction, support safety, and identify key locations within the Site. The location of required signage is yet to be determined, however it is anticipated that signage of different sizes, lengths, shapes and colours will be required throughout the Site for navigational, operational and safety purposes with the majority of signage likely to be illuminated. No advertising or promotional illuminated signage will be displayed on the Site.

The illuminated signage will be designed and constructed in a manner that reduces visibility from nearby sites as far as practicable while maintaining minimum illumination levels required for safety and navigation.

2.25 LIGHTING

2.25.1 Construction Lighting

Construction works are not planned to occur during nighttime however where natural light levels are reduced (for example during long concrete pours, early morning hours or periods of poor visibility), temporary construction lighting may be utilised to ensure safe working conditions. This lighting could include standard vehicle head and taillights, flashing safety beacons and mobile lighting plant. Ongoing construction lighting will likely include interior lighting for site offices / portacom facilities and security lighting for construction areas. This lighting will be temporary and only present for the length of construction activities.

2.25.2 Permanent Lighting

A detailed lighting plan will be prepared for the Site at detailed design, including yard and security flood lighting in accordance with WorkSafe guidelines, NZ Standard AS/NZS 1158.1.2, and industry (Port Equipment Manufacturing Association) standards for container yards. The floodlighting system will include the following components and specifications:

- Lighting Towers:
  - Located in roadways within the facility to minimise the impact of shadows cast by container stacks; and
  - A maximum height of 30 m, with reduced heights for towers within the flight fan area to comply with the height restrictions.
- Exterior Lights:
  - Asymmetrical LEDs, of a power rating and quantity for each tower to achieve the following light levels:
    - Provision of a 50 lux average as measured 1 m above ground level; and
    - Provision of a 10 lux minimum for safety, security and emergency egress;
  - Provision of up to 4,000K colour within the container yard, required to accurately render the colours of hazardous materials signs and labels;
  - Provision of up to 3,000K colour in other areas such as circulation areas;

- Flat glass with zero upward component, installed without tilt utilising shielding to ensure spill light is controlled; and
- No feature uplifting, or decorative lighting of facades will occur.

- Control System:
  - Yard lights will be switched on and off remotely and will only be used while mobile plant is operating in the yard;
  - Security lights will be switched on and off automatically via daylight sensor;
  - No or very slow transition motion detection except where safety and security requirements necessitate the use of faster switching; and
  - Each tower may include a combination of yard and security lights.
- Internal building lights:
  - Slow lighting transitions where visible from outside the Site except where safety or operational requirements necessitate the use of faster switching; and
  - Appropriate luminaire selection and orientation, controlled light distribution, and building design measures such as tinted glazing, screening, or internal shielding, where practicable to reduce visibility from outside the Site.

All lighting installed within the designated flight fan area will comply with relevant Civil Aviation Authority ("**CAA**") requirements. This includes ensuring that lighting structures do not exceed approved height restrictions and that light fittings are designed to minimise glare or distraction for aircraft operations.

2.26 LANDSCAPING

Planting will be undertaken along the Site boundaries to provide landscape visual mitigation for the Site development and to enhance the ecological values of the Silver Stream boundary. Planting species and locations have been identified in Mike Moore (2026) and detailed on the Concept Landscape Plan provided in **Part B**.

Indicatively, it is proposed to undertake landscaping as follows:

- **Along Dukes Road North boundary**: A landscaping strip will be provided between the roadside stormwater swale and the proposed acoustic walls to provide visual mitigation, by way of softening and screening, of the SLIP.
- **Along the eastern side boundary**: A *Pittosporum eugenioides / tenuifolium* screen tree belt will be planted along the length of the boundary between the proposed eastern

stormwater swale and the toe of the acoustic bund to provide visual mitigation, by way of softening and screening, of the SLIP.

- **Along the southern boundary on the bank of the Silver Stream**: Planting of selected eucalyptus specimen trees and locally appropriate indigenous species will be undertaken to fill gaps within the existing tree canopy along the stream bank. Pest and weedy species will be removed with controlled implemented to reduced rest of return.

Planting of a Pittosporum eugenioides / tenuifolium screening tree belt will also occur along the top of the western extent of the western swale within the KiwiRail corridor to provide visual mitigation of views of the SLIP from the west.

All areas to be planted will be protected from pests and competing grasses / weeds until the planting has established. Plants will be irrigated and mulched as required for successful establishment and growth. Plantings will be monitored for a period of three years for survival with dead plants replaced.

SLPL also proposes a condition of consent that required the implementation of natural character enhancement measures for the section of Silver Stream located within the Site. This will include targeted removal and control of weedy vegetation, establishment of locally appropriate indigenous vegetation (whilst retaining important screening trees), and ongoing control of pest and weedy species.

The photo simulations prepared by VirtualView (refer to **Part E**) provide visual representation of how the SLIP will appear from a selection of viewpoints adjacent to, and within, the wider surrounding area of the Site.

2.27 OPERATIONAL HOURS

It is proposed that the SLIP will operate 24 hours a day, 7 days a week to accommodate continuous freight and container operations. However, during the initial stages of development, traffic volumes and operational demand may not justify full 24-hour activity. Operations will therefore be scaled in line with actual demand, with hours adjusted accordingly.

Initially, the SLIP is expected to generate two rail movements per day, one inbound and one outbound from Port Chalmers, to occur during daylight hours (unless approved in writing by DCC). Each train will typically comprise 25 wagons.

The fully established SLIP (i.e. when Stage 3 is complete) is expected to generate 30,000 truck arrivals (and departures) per annum with a peak day rate of 277 trucks and peak hourly rate of 33 trucks.

2.28 OFFICE SPACE

The office building, approximately 1,000 m^2 in size, will be located near the main Site entry and adjacent to the staff car parking area for ease of access. This building will serve as the central administrative and operational hub for the Site, accommodating management, logistics, and support staff. The office will include workstations, meeting rooms, and staff amenities.

3. EXISTING ENVIRONMENT

3.1 OVERVIEW

To satisfy Schedule 5, clause 5(b) and clause 5(d) of the FTAA, this section outlines the key characteristics of the Site for the SLIP and the surrounding area. It provides details of the:

- Existing Site environment;
- Existing relevant authorisations and approvals associated with the Site;
- Surrounding land ownership and utilisation;
- Environmental features of the statutory planning framework that are applicable to the Site;
- Geotechnical, air quality, hydrological and contaminated land conditions;
- Existing noise and lighting levels, transportation network and rail network conditions;
- Existing three waters infrastructure;
- Cultural values;
- Freshwater quality, aquatic ecology and terrestrial ecology values;
- Recreation, and landscape and natural character values; and
- Archaeological and heritage features.

Together, these factors provide a thorough analysis of the existing environment, establishing a baseline for assessing the effects of the SLIP, and guiding associated decision-making.

Technical assessments have been commissioned by SLPL to establish an understanding of the existing environment of the Site and the wider environment within which the SLIP is proposed. The following sections provide a concise summary of the existing physical and environmental values identified in the technical assessments. For further details of the existing environment, refer to the corresponding technical report(s) provided in **Part B** to these application documents.

3.2 SITE LOCATION AND GENERAL CHARACTERISTICS

The Dukes Road North Site is located within the territorial boundaries of the DCC, with ancillary activities proposed within the Dukes Road North road corridor (operated by DCC). As detailed previously (Section 1.9), any approvals required for works within the KiwiRail corridor will be obtained outside of the Fast-track process. A Site location map is provided

as Figure 1-2, with the cadastral boundary and immediate surrounds shown in the indicative Site layout provided as Figure 2-1, and included in **Part E**.

Viewpoints A-F provided in Figures 3-2 – 3-7 depict the Site from those locations identified in Figure 3-1.



Figure 3-1: Viewpoint Guide for Site Photos



Figure 3-2: Viewpoint A – Looking Southeast from the Northwestern Corner of the Site



Figure 3-3: Viewpoint B Looking Southwest from the Northeastern Corner of the Site



Figure 3-4: Viewpoint C - Looking Northeast from the Southwestern Corner of the Site



Figure 3-5: Viewpoint D - Looking South from the Western Lower Half of the Site



Figure 3-6: Viewpoint E - Looking South from the Eastern Lower Half of the Site



Figure 3-7: Viewpoint F - Looking Northwest from the Southeastern Corner of the Site

Figure 3-8 provides a view across Silver Stream to the Site (northwestern direction) from a location to the southeast of the Site on the Whakaehu / Silver Stream Trail.

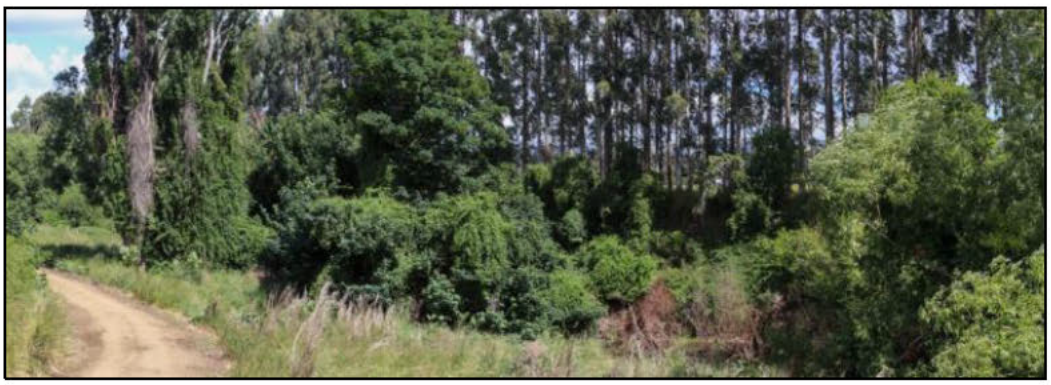


Figure 3-8: View Across Silver Stream to the Site

The Site is owned by SLPL, as detailed in Table 3-1 which details land ownership for the various properties associated with the activities of the SLIP.

Consultation with DCC regarding proposed works within the Dukes Road North road reserve has been positive, with DCC agreeing to the proposed works in principle.

Ongoing consultation has been occurring with KiwiRail with regard to the works proposed within the KiwiRail corridor, and the connection of the rail siding into the rail network. A letter from KiwiRail confirming their support of the Project in principle is provided in **Part F**.

Table 3-1: Land Ownership for the SLIP

Address	Legal Owner	Title	Appellation
270 Dukes Road North, Mosgiel	Southern Link Property Limited	OT3C/897	Part Section 10 Block V East Taieri Survey District
292 Dukes Road North, Mosgiel	Southern Link Property Limited	OT3C/899	Part Section 9 Block V East Taieri SD
274 Dukes Road North, Mosgiel	Southern Link Property Limited	OT304/127	DP 5579
N/A	Southern Link Property Limited	OT329/233	Part Section 9 Block V East Taieri SD
Dukes Road North – Road Reserve	DCC	N/A	Parcel ID: 3200305

The rectangular Site is approximately 40 hectares in size, sitting northwest of urban Mosgiel and immediately adjacent (to the east) of the Dukes Road North industrial precinct. It is approximately 15 minutes' drive from central Dunedin and 30 minutes' drive from Port Chalmers.

The Site has historically been used for rural primary production activities, and it also contains multiple rural-residential dwellings and ancillary farming structures.

> The northern boundary of the Site fronts Dukes Road North with all existing site access provided off this road. is the northern Site boundary is predominantly planted with shelter belt or shelter hedging.

> The western boundary of the Site is planted with a mature shelter belt, separating the rural properties from the immediately adjacent KiwiRail corridor. Stedman Road is located on the western side of the rail line.

> The southern boundary of the Site intersects Silver Stream (which has very limited instream and riparian habitat) with shelter belt and planting evident along the northern bank of the stream.

> The eastern boundary of the Site adjoins two rural lots (of which SLPL owns the southern lot - 245 Puddle Alley).

The topography of the Site is generally flat except for a steep riparian margin along Silver Stream. The Site is mostly clear of vegetation or structures, with the exception of the aforementioned boundary planting and dwellings, some internal boundary planting, and screening planting around the dwellings. The trees on the site are not scheduled.

3.3 TITLES AND REGISTERED INTERESTS

The Records of Title for the Site are subject to those interests set out in Table 3-2. These interests have informed the Project design, with the Site layout appropriately addressing the restrictions imposed by these title instruments.

Table 3-2: Title Instruments

Interest	Comment
Part Section 10 Block V East Taieri SD	
Building Line Restriction 334251	This Building Line Restriction imposes a restriction on buildings or any part of buildings being placed within 33 feet of the centreline of Dukes Road North. This historic instrument

Interest	Comment
	(1968) only extends marginally beyond the allotments front boundary and therefore will not materially affect the proposed SLIP as no buildings are proposed within this area.
Gazette Notice X7981	This Gazette Notice was registered against the property in 1937 pursuant to the Public Works Amendment Act 1935. It was notified by the Otago Aero Club and establishes a height plane limitation for any building, pole mast, structure or tree to 1/15th of the distance from the nearest part of the boundary of the Taieri Aerodrome. Whilst the Public Works Act Amendment Act 1935 has been replaced, the Gazette Notice remains in force. The implications of this title instrument require additional management of container stacking heights in the southwest of the Site.
Land Covenant 13187848.4	This Covenant is a no objection covenant between the applicant and Otago Helicopters Limited. The Covenant prevents Otago Helicopters Limited from objecting to development of the Site for a logistics industrial hub (being the subject of this Application).
Land Covenant 13187848.5	This non-objection Covenant reciprocates the above agreement, with SLPL prevented from objecting to the future use of OT13B/729 for air transport, aerial lifting, tourism, flight training, maintenance, firefighting, air ambulance and ancillary uses.
DP 5579	
Gazette Notice X7981	As above.
Land Covenant 13187848.4	As above.
Land Covenant 13187848.5	As above.
Part Section 9 Block V East Taieri SD	
Transfer and Grant of Easement 129038	This right of way easement provides access for rear site Part Section 9 Block V East Taieri as the benefitted tenement over

Interest	Comment
	292 Dukes Road North. This instrument will be extinguished by formal deed of surrender. Accordingly, there will be no adverse implications to the proposed SLIP.
Building Line Restriction 334251	As above.
Gazette Notice X7981	As above.
Land Covenant 13187848.4	As above.
Land Covenant 13187848.5	As above.

3.4 EXISTING AUTHORISATIONS AND APPROVALS

3.4.1 Archaeological Authority

SLPL sought and acquired Archaeological Authority 2026-362 from HNZPT under the HNZPT Act 2014 for the removal of all above ground visible buildings and archaeological features associated with archaeological site Holmhead Farm (discussed further in Section 3.18) and any other archaeological features identified on the Site identified as part of the excavations undertaken for the SLIP. This authority was granted on 30 January 2026 and expires on 30 January 2036.

3.4.2 Existing Consents Relevant to the Site

Land-use approvals for the construction of bores for domestic and stock use and groundwater purposes are currently registered to the Site. Copies of these existing authorisations are provided in **Part I** of the application documents.

The existing consents comprise:

> A land-use consent[27] granted in March 2001 for construction of a bore (I44/0947) for stock water and a single domestic supply (with the associated water take for stockwater and domestic supply being a permitted activity under the Regional Plan: Water for Otago ("**Regional Water Plan**"));

[27] Consent 2001.183.

- A water permit[28] for the taking of 58 L/s for irrigation purposes during the 2012/2013 irrigation season; and
- A land-use consent[29] granted in 1995 for construction of bores (I44/0835, I44/0835, I44/0836, I44/0836-P3, I44/0837 and I44/0837-P5) for the purpose of investigation / monitoring for measuring water quality (Closed North Taieri Landfill) and water levels adjacent to the north branch of Silver Stream.

3.5 SURROUNDING LAND OWNERSHIP AND UTILISATION

The Site is located on the boundary of rural and industrial areas. The north Mosgiel industrial precinct and Taieri Aerodrome are located immediately west of the Site and form a distinctly industrial environment which includes:

- Fonterra Mosgiel Cold Storage and rail siding;
- General warehousing, manufacturing and logistics;
- Construction yards;
- Storage;
- Taieri Aerodrome which operates various private and commercial flights and helicopter operations; and
- KiwiRail's Taieri Branch Rail Line.

The environment to the north, east and south is predominantly rural in nature, with urban Mosgiel located ~650 m south-west of the Site. Surrounding land uses include:

- Rural agriculture and horticulture to the north, east and south;
- Rural lifestyle living generally to the south of the Site across Silver Stream; and
- The urban residential Mosgiel environment to the south-west.

The closest dwellings to the Site are separated by a combination of distance, shelter belt planting and / or Silver Stream.

3.5.1 Adjacent Landowners and Occupiers

In accordance with section 53(2)(h) and (i), and clause 5(1)(d) of Schedule 5 of the FTAA, the details of all adjacent owners are illustrated in Figure 3-9 and detailed in Table 3-3.

[28] Consent 2001.183 95678.

[29] Consent 95871.

Notably, the Site is strategically positioned within an area with established logistics, in close proximity to existing freight warehousing and other transport operators (as represented in Figure 3-10). The co-location of complimentary supply chain activities will support operational efficiencies, reduce travel distance for goods, functional need for the siting of the SLIP in this location. Further details of adjacent landowners are provided in the following sub-sections.

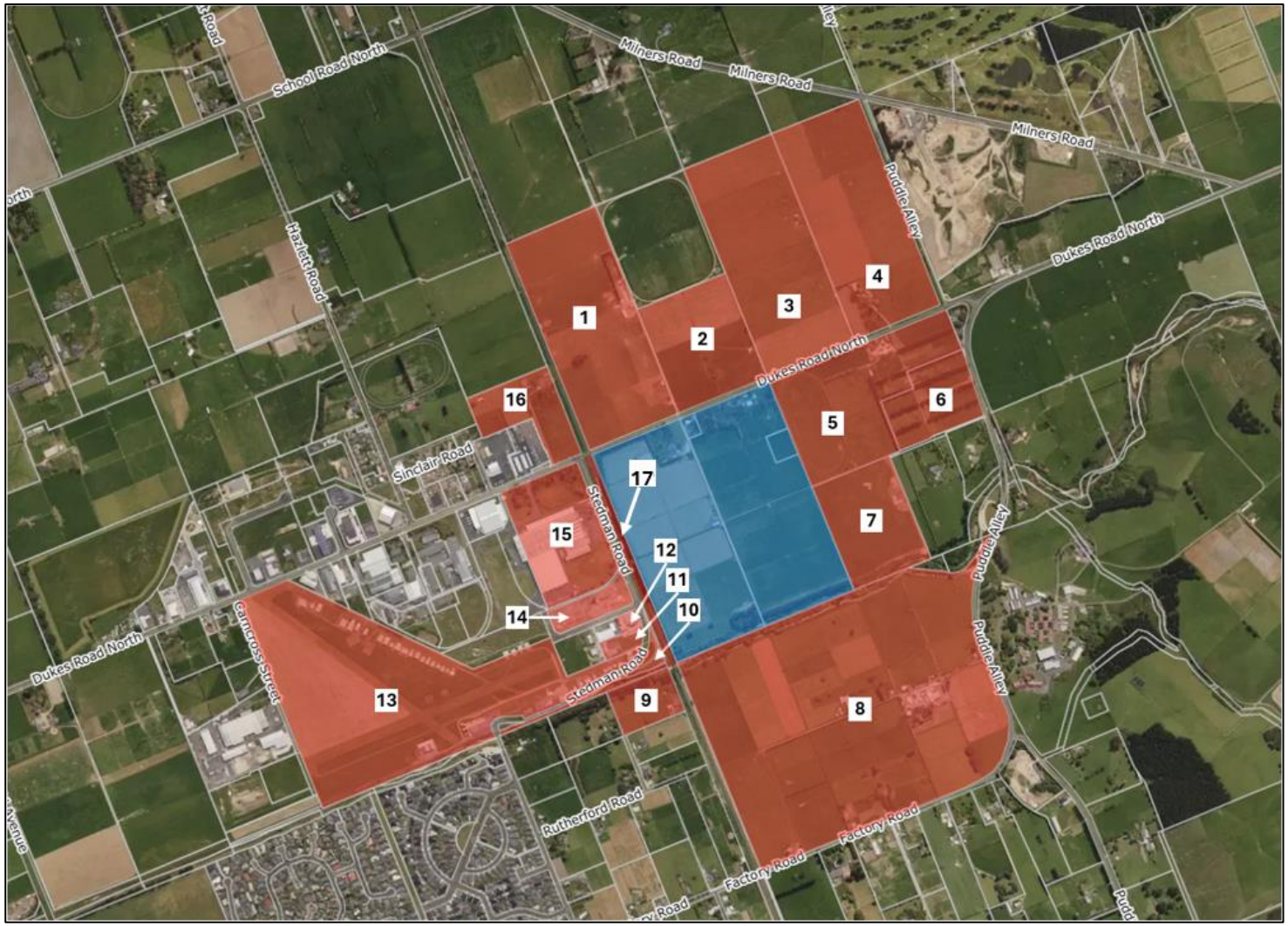


Figure 3-9: Map of Adjacent Land (to be read in conjunction with Table 3-3)

Table 3-3: **Adjacent Landowners**

Map Ref.	Address	Legal Description	Record of Title	Owner/Occupier
1	273 Dukes Road North, Mosgiel	Section 4 Block IX East Taieri SD	OT4D/872	[redacted]
2	291 Dukes Road North, Mosgiel	Lot 2 DP 12032	OT4B/6	Southern Link Property Limited
3	347 Dukes Road North, Mosgiel	Section 2 Block IX East Taieri SD	OT264/40	[redacted]
4		Section 1 Block IX East Taieri SD		
5	340 Dukes Road North, Mosgiel	Lot 1 DP 300959	9008	[redacted]
6		Lot 1 DP 302293		
7	245 Puddle Alley, Mosgiel	Lot 2 DP 329494	120657	Southern Link Property Limited
8	275 Factory Road, Mosgiel | 183 Puddle Alley, Mosgiel | 253 Factory Road, Mosgiel | 185 Puddle Alley, Mosgiel	Lot 5 DP 23060	OT15A/310	[redacted]
9	54 Rutherford Road, Mosgiel	Section 27 Block V East Taieri SD	OT10B/1159	[redacted]

Map Ref.	Address	Legal Description	Record of Title	Owner/Occupier
10	99 Stedman Road, Mosgiel	Lot 3 DP 11036	OT5A/1248	Dunedin City Council
11	58 Stedman Road, Mosgiel	Lot 2 DP 15984	OT7A/1401	[redacted]
12	1 Odlins Place, Mosgiel	Lot 1 DP 580061	1078781	[redacted]
13	66 Stedman Road, Mosgiel | 110 Stedman Road, Mosgiel | 96 Stedman Road, Mosgiel	Lot 1 DP 11036	914468 and OT2C/1307	[redacted]
14	42 Stedman Road, Mosgiel	Section 2 SO 441464	1075571	Southern Link Property Limited
15	222 Dukes Road North, Mosgiel | 22 Stedman Road, Mosgiel	Lot 1 DP 10997	OT18D/1117	[redacted]
16	231 Dukes Road North, Mosgiel	Part Section 5 Block IX East Taieri SD	OT4D/871	[redacted]
17	Stedman Road - KiwiRail Corridor	Parcel ID: 3171315	N/A	KiwiRail

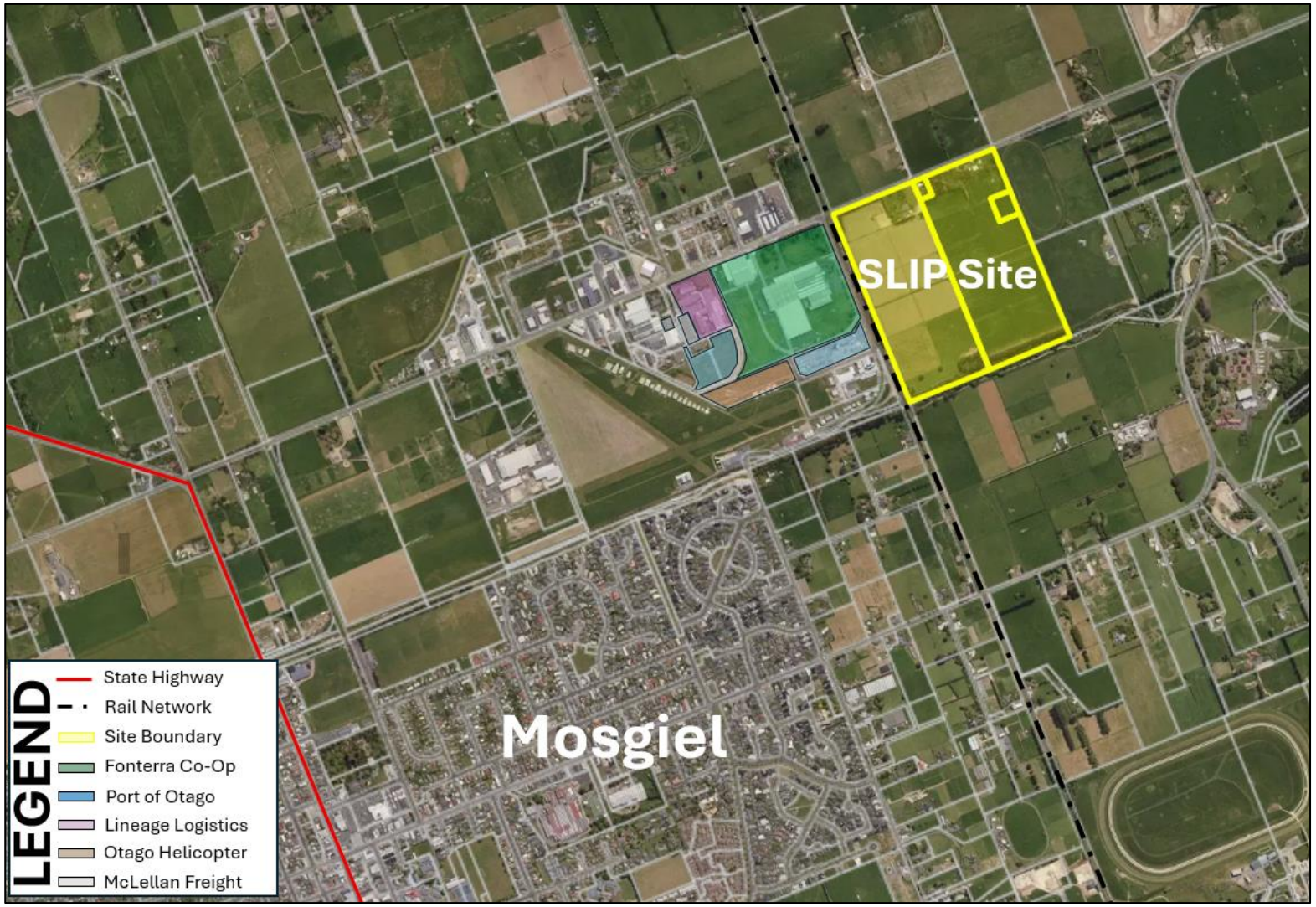


Figure 3-10: Surrounding Supply Chain

3.5.1.1 Fonterra Cold Storage

Fonterra Co-Operative Group Limited operate a dairy distribution and warehousing storage facility at 222 Dukes Road North containing warehousing, ambient storage, cool storage, container yard, offices, carparking and a rail siding accommodating daily train movements, each consisting of 24 wagons.

3.5.1.2 Southern Link Property Limited Container Storage Facility

SLPL obtained consents from ORC (Permit RM25.294.01) and DCC (Resource Consent LUC-2025-340) for the establishment of a container storage yard / handling facility at 7/180 and 9/180 Dukes Road North, Mosgiel, Dunedin 9092. The site of the container storage yard is located within the Silver Stream Industrial Park.

The container storage yard / handling facility has been designed to support inland port operations. The site is due to become operational in March 2026 and will accommodate up to 100 containers. The containers will be transported to site using an existing rail siding, which will reduce truck movements between Mosgiel and Dunedin.

3.5.1.3 Taieri Aerodrome

Taieri Aerodrome is located approximately 350 m west of the Site and is a non-certificated aviation facility, listed in the CAA Aeronautical Information Publication. The aerodrome is operated by the Otago Aero Club with small fixed-wing aircraft and helicopter flights occurring to and from the aerodrome. The aerodrome has numerous hangars and a resident maintenance and repair organisation.

The aerodrome is available for general use for private operations (with the prior approval of the Operator) and commercial operations.

There is no form of air traffic control at the aerodrome and fixed wing operations are conducted under visual flight rules only (i.e. the pilot must position the aircraft for landing by visual reference to the aerodrome and its surroundings). There are no night fixed wing aircraft operations as the runways do not have any lighting.

Helicopters Otago operates commercial and medical helicopters from its base on the aerodrome's south boundary. The medical helicopters can operate at night and under instrument conditions due to usage of global positioning satellites. The approach from the southwest, aligned with Runway 05.

Height limitations apply to development of the Site to protect approach and take-off procedures for the aerodrome, set out by the 1:20 OLS under the District Plan. These OLS, originating at the eastern end of Runway 05-23, align with the Taieri Aerodrome Approach

and Take-off Fan Contours and increase in height across the Site (ranging from approximately 18.5 m minimum at the western boundary of the Site up to 48.8 m at the eastern boundary).

Flight Paths over the SLIP

The Taieri Aerodrome has two designated grass runways: 05-23 (853 m long); and 11-29 (749 m long). Runway 05-23 is the primary runway and is aligned directly towards the Site (see Figure 3-11) with the predominant take-off direction being towards the south-west. Aircraft take off and approach above the Site when runway 05-23 is in use.

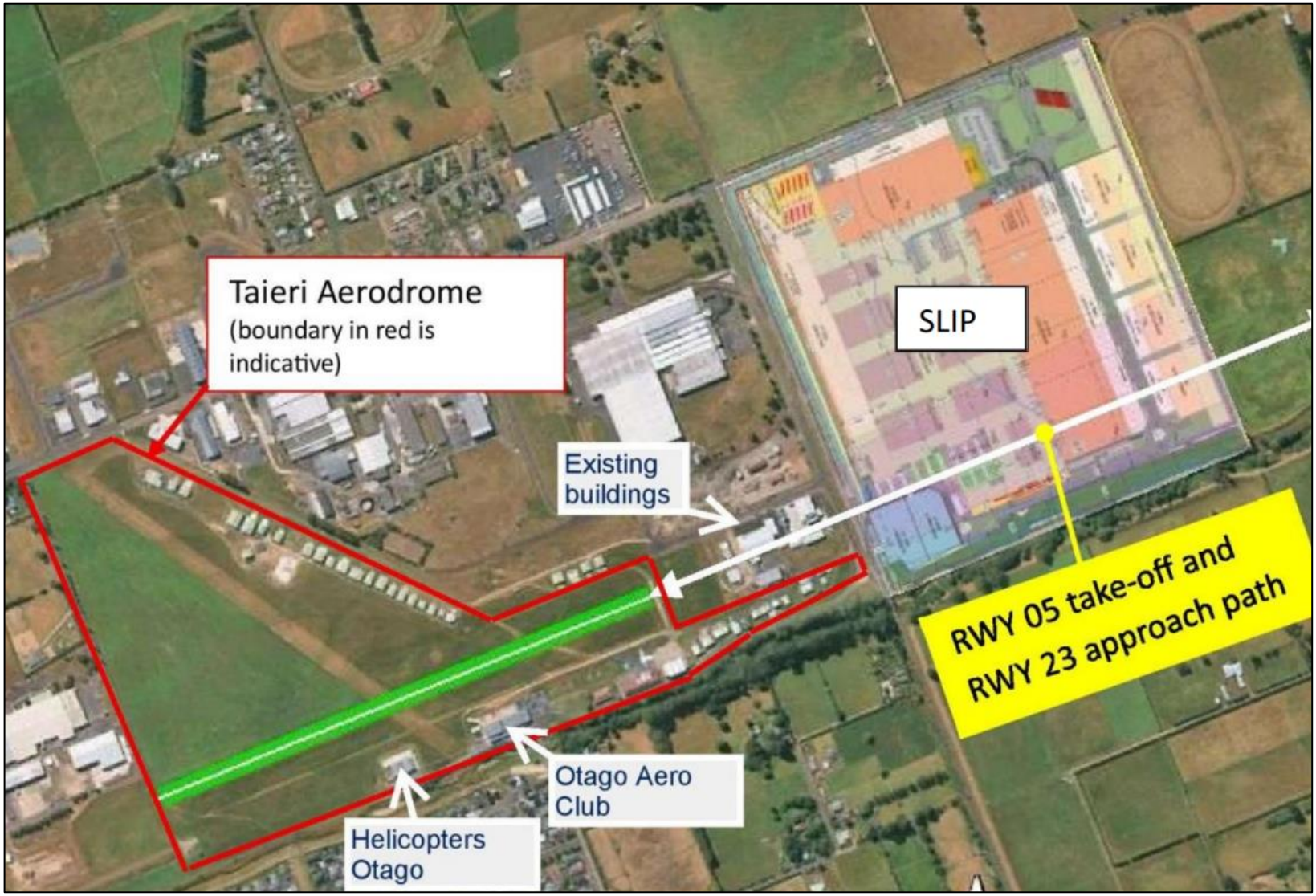


Figure 3-11: Spatial Arrangement of Taieri Aerodrome Runway 05-23 (highlighted in green) and the SLIP

3.6 STATUTORY PLANNING FRAMEWORK

3.6.1 Dunedin City 2nd Generation District Plan

3.6.1.1 Zoning – Site and Surrounds

The District Plan is the second district plan developed for the Dunedin district under the RMA. As of February 2025, the District Plan is partially operative due to site specific provisions still being under appeal. The provisions that are under appeal are not relevant to the Site or the proposed activities of this Application, and therefore the District Plan can be treated as operative in relation to the Project.

The Site is zoned Taieri Plains Rural in the District Plan. Surrounding land is zoned Taieri Plains Rural, Industrial, Taieri Aerodrome, Rural Residential 1 and General Residential 1 with immediately adjacent land being zoned Taieri Plains Rural, Industrial or Taieri Aerodrome (refer to Figure 3-12).

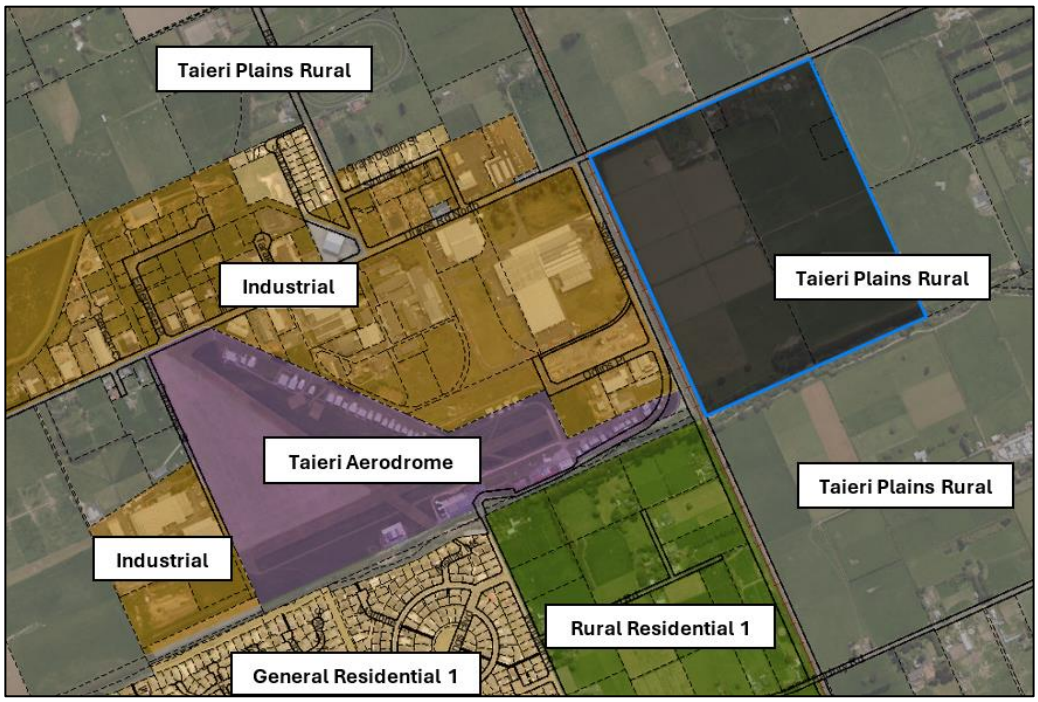


Figure 3-12: District Plan Zoning Map of the SLIP (in blue) and Surrounding Area

The District Plan recognises that the rural environment dominates the Dunedin district, making up approximately 96% of the total land area, and being primarily used for pastoral and arable farming, horticulture, planted production forestry, mining and tourism. The District Plan notes that most of these activities rely on access to minimum sized rural land and soil resources to operate. The District Plan identifies key issues in the rural

environment as being the fragmentation of rural land through subdivision, especially rural residential subdivision, and the establishment of non-productive land-uses, especially rural residential activities.

Resultantly, a key objective of the District Plan is to ensure rural zones are reserved for productive rural activities and the protection and enhancement of the natural environment, along with certain activities that support the well-being of communities where these activities are most appropriately located in a rural rather than an urban environment.

Regarding the interface with adjoining rural zoned sites, the District Plan aims to minimise the potential for reverse sensitivity effects on rural activities, maintain a reasonable level of amenity for existing residential activities in the rural zones, maintain and enhance rural character values and amenity, and maintain and enhance the productivity of rural activities in the rural zones. As such, the activity status and built form standards of the rural zones place a deliberate focus on controlling activities along boundaries with other rural or residential zones / activities through measures such as minimum setbacks, maximum height allowances and screening.

By contrast, with regard to the interface with the industrial and Taieri Aerodrome zones to the west, the District Plan does not assign notable character values or amenity to industrial activities or airport activities. These activities are considered less sensitive to development matters such as built form, noise and lighting effects. As such, there are no specific rural zone objectives, policies, rules or assessment criteria relating to boundaries with the industrial zone under the rural zoning.

3.6.1.2 Site Overlays and Controls

The Site is subject to the following overlays and controls identified under the District Plan, as shown in Figures 3-13 and 3-14:

- Fonterra Noise Control – Noise sensitive activities within the mapped control area are required to provide specified acoustic insulation to manage potential noise effects;
- High Class Soils – Identifies areas of high class soils to which additional rules apply to land disturbance activities to manage effects on high class soils;
- Hazard 1 (Flood) Overlay Zone (High Risk Flood Hazard Area 14B) and Hazard 2 (Flood) Overlay Zone (Moderate Risk Flood Hazard Area 14D) – Both overlays identify areas at risk from flooding. The establishment of natural hazard sensitive and potentially sensitive activities within these areas is controlled by the District Plan to manage potential adverse flooding effects;

- Taieri Aerodrome Flight Fan – This mapped fan area imposes a maximum height restriction on the Site ranging from approximately 18.5 m to 48.5 m above ground level to protect the aviation operations of Taieri Aerodrome;
- Dunedin Airport Flight Fan - This mapped fan area applies over 200 m above ground level on the Site to protect the aviation operations of Dunedin airport;
- Groundwater Protection Mapped Area Type B Lower Taieri Aquifer and Type A Lower Taieri Aquifer – These controls identify areas to which additional rules apply to land disturbance activities to control health and safety effects on groundwater; and
- Esplanade Reserves and Strips Mapped Area (Silver Stream) – Identifies that subdivision of all land adjacent to the Silver Stream must provide an esplanade reserve of 20 m width.

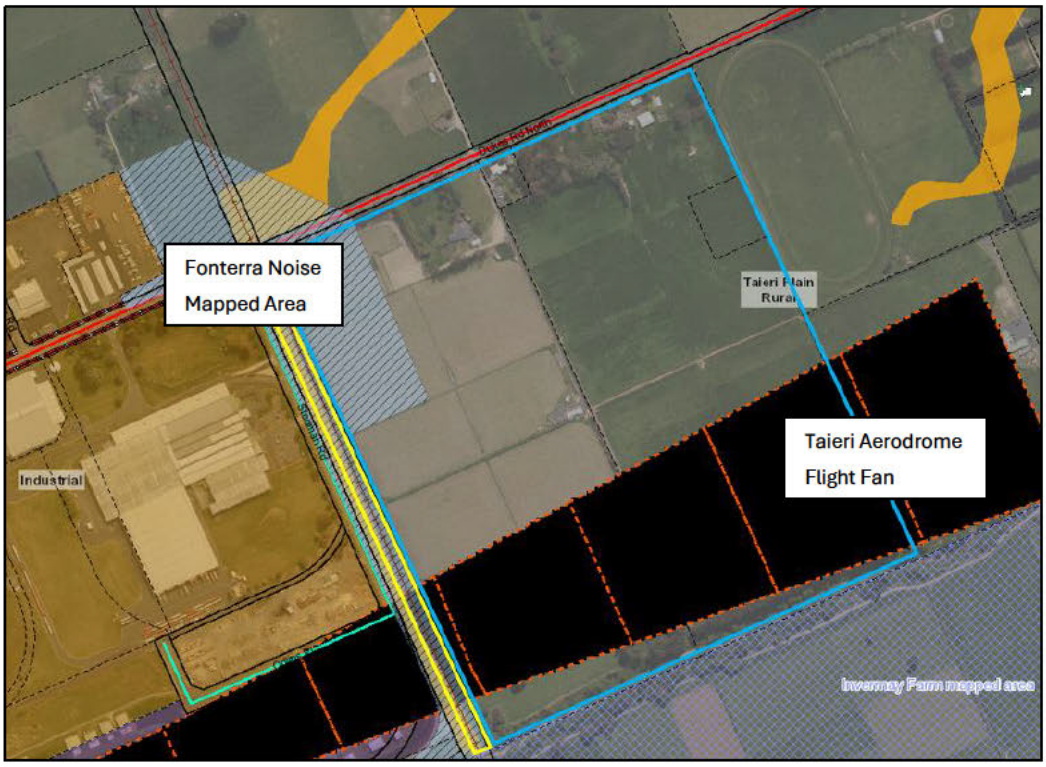


Figure 3-13: District Plan Overlay Map of the SLIP (Light Blue), KiwiRail Corridor (Yellow) (with Flood Hazard Overlays excluded)

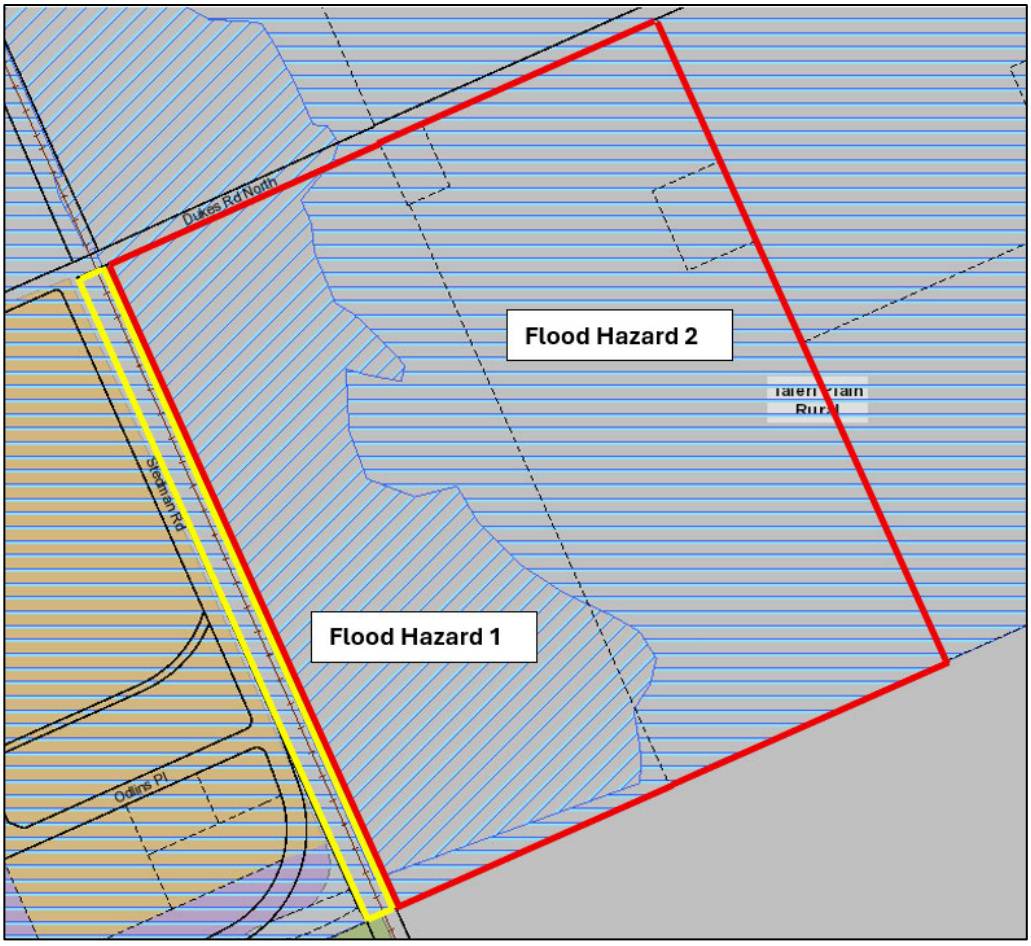


Figure 3-14: Flood Hazard Overlay Map of the SLIP (in red) and KiwiRail Corridor (Yellow)

An assessment of the consents sought under the District Plan for the SLIP is provided in **Section 4** of this substantive application and a full rule assessment is provided in **Part G**.

3.6.2 Otago Regional Plans

The Otago Regional Plans consist of:

> The Regional Water Plan;

> The Regional Plan: Air for Otago (“**Regional Air Plan”**); and

> The Regional Plan: Waste for Otago (“**Regional Waste Plan**”).

The following features of the plans are of relevance to the Application:

> The Regional Water Plan identifies the Site as sitting above the Lower Taieri Aquifer (Series C) and within a Groundwater Protection Zone B. The drain running alongside the Taieri Branch Rail Line is also scheduled under the plan (ORC Scheduled Drain (S3)); and

> The Site is not located within any airsheds identified in Air Zone 1 and 2, and is therefore located in Air Zone 3 under the Regional Air Plan, which is subject to less stringent air quality standards than Air Zone 1 and 2.

3.6.3 National Policy Statement for Highly Productive Land

The NPS-HPL provides direction to protect HPL from inappropriate use and development.

AbacusBio Limited (2026) has prepared a Land Assessment[30] which describes the Site and soil type.

AbacuBio Limited identifies that the predominant soil type of the Site is a mottled immature Pallic soil which typically has drainage constraints with characteristics tending to be summer dry and winter wet. In addition, the District Plan maps show that the Site is subject to flooding, as confirmed in the Stormwater Assessment prepared by Stantec[31], noting that flows are conveyed through the Site in flood events greater than the 2% AEP (refer to Section 3.14.1).

Under clause 1.3 of the NPS-HPL, HPL which is not yet mapped in an operative regional policy statement can only be defined as HPL if it meets clause 3.5(7). 'Our Environment Maps', administered by Manaaki Whenua Landcare Research, shown in Figure 3-15, identify that the land use capability ("**LUC**") for the Site includes LUC 1 land being land that is arable with minimal limitations. The Site is zoned rural, is not identified for future urban development, and is not subject to a notified plan change to rezone to urban or rural lifestyle. Therefore, the Site is considered to be HPL under Clause 3.5(7) of the NPS-HPL.

[30] Part B – Land Assessment, AbacusBio Limited, 12 March 2026.

[31] Part B – Stormwater Assessment, Stantec, 11 March 2026.

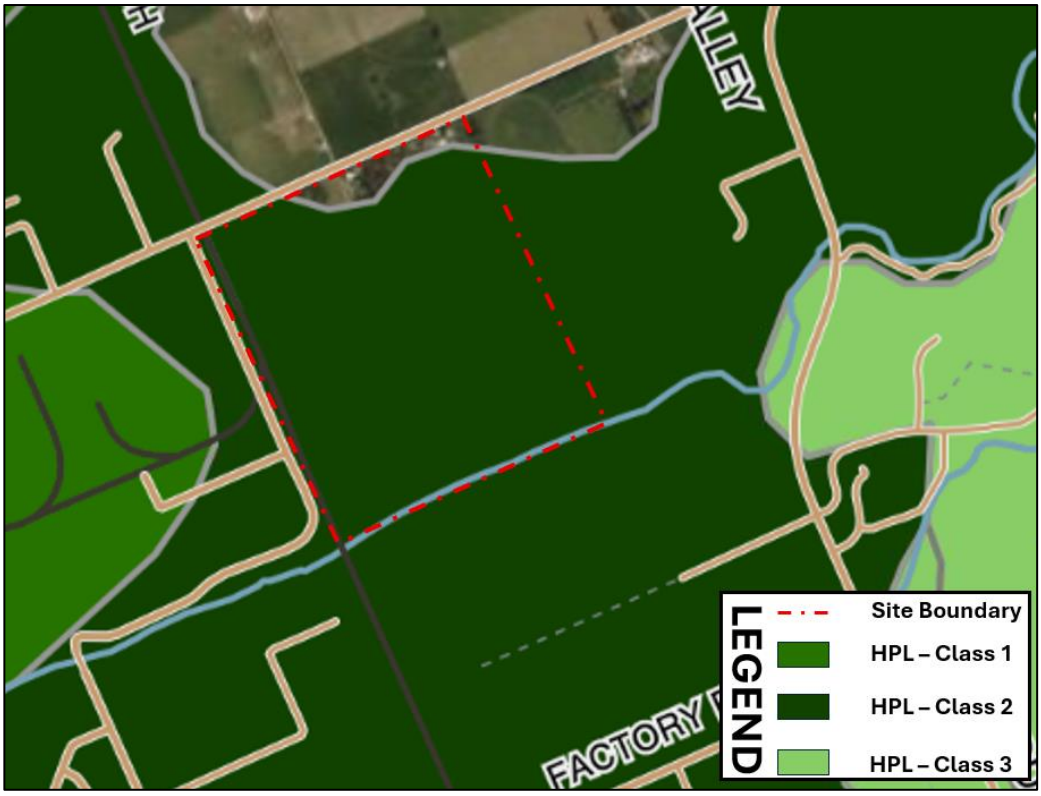


Figure 3-15: HPL Class of the Site (dashed in red) (Source: Manaaki Whenua Landcare Research)

3.6.4 Statutory Acknowledgements, Māori Land, and Customary Marine Titles

There are no statutory acknowledgements in the Ngāi Tahu Claims Settlement Act 1998 associated with the Site.

There are no parcels of Māori land, marae, or identified wāhi tapu associated with the Site.

For completeness, it is also noted that there are no customary marine titles of relevance to the Site.

3.6.5 Public Conservation Land

There is no public conservation land within the Site.

3.7 GEOLOGY AND GEOTECHNICAL CONDITIONS

Stantec (2026a) has undertaken a Geotechnical Desktop Study and Appraisal[32] of the Site to provide a preliminary desktop assessment of the expected ground conditions and likely geotechnical-related risks of the Site.

The Site lies on the Taiari Plain within an extensive array of ranges and basins formed from the tectonic uplift, faulting and folding of schist basement rock and is underlain by two geological formations:

> OIS2 Late Pleistocene River Deposits, comprising poorly consolidated, slightly weathered sandy quartz, schist, or volcaniclastic derived gravel and sand; and

> OIS1 Holocene Fan Deposits, comprising poorly consolidated, often poorly sorted, fine to bouldery gravel with sand and mud.

The Site topography is generally flat, sloping gently downward (by about 3-5 m) to the south and west across the Site. Silver Stream forms the southeastern boundary of the Site (flowing to the southwest) and is incised approximately by 7-10 m relative to the adjacent site ground levels. Bank slopes are generally highest and steepest in upstream areas of the stream reach along the Site and decrease slightly in downstream areas. A small area of potential slope instability has been identified along the bank of Silver Stream near the southeast corner of the Site at the toe of the northern stream bank, and the western downstream area has been identified as experiencing subsidence (refer to Figure 3-16).

[32] Part B – Geotechnical Desktop Study and Appraisal, Stantec New Zealand, 20 February 2026.

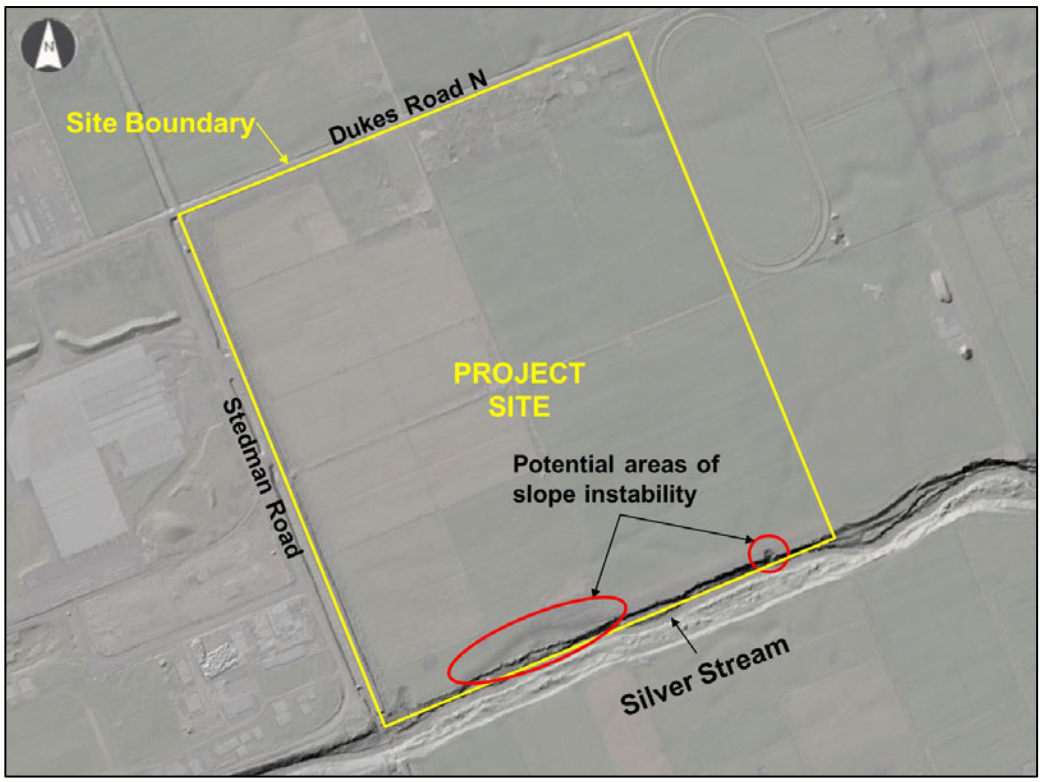


Figure 3-16: Site Topography and Areas of Potential Instability

The Site has a low liquefaction risk although a lateral spreading risk exists near Silver Stream. Site-specific seismic hazard and liquefaction susceptibility shall be further quantified during detailed design.

Stantec (2026a) has prepared a conceptual ground model for the Site based on previously undertaken site investigations and the desktop review. It is expected that the Site will generally be underlain by topsoil to a depth of 0.3 m, fine-grained soils to a bottom depth of 0.8 m to 1.6 m, gravel and sand mixtures to a bottom depth of 2.4 m to 2.6 m and interlayered fine and coarse-grained soils below this. The upper fine-grained soil layer presents potential bearing capacity issues based on the previous identification of potentially compressible soils in some areas of the Site. This material which generally extends to depths of 0.8 m -1.1 m below ground level ("**bgl**") is expected to be partially excavated based on the anticipated subgrade depths which will reduce the immediate settlement risk to a manageable level.

3.8 HYDROGEOLOGY

Stantec (2026b) has undertaken a Groundwater Assessment[33] of the Site comprising a desktop review, site walkover, and installation of groundwater level loggers in three existing boreholes across the Site.

A groundwater study of the Lower Taiari Plains describes the underlying geology as the "Dukes Formation" overlain by the "Wingatui Formation". The low point of Silver Stream is approximately 20 m above sea level ("**asl**"). The watercourse is one of the main rivers on the Taiari Plains and is hydraulically connected to the local groundwater system acting as a recharge feature with a negative vertical hydraulic gradient and therefore is classified as a losing stream. Resultantly, measured groundwater levels in the area range from 6 m-9 m bgl with seasonal fluctuations of generally 1 m-2 m and is typically deeper in summer and shallower in winter due to recharge in the aquifer system by rainfall, foothill runoff and being fed by surface water features.

Stantec (2026b) has undertaken onsite measuring of groundwater levels with these ranging from approximately 7.5 m – 9 m bgl across the Site, similar to the base level of the Silver Stream channel in the area. Therefore, even accounting for seasonal fluctuations, groundwater is not expected to be encountered during excavation works. As such, dewatering during construction is not anticipated to be required.

Groundwater quality sampling across a range of monitoring periods for a variety of contaminants has demonstrated a quality within the comparable New Zealand Drinking Water Standards 2025 guideline values. These have remained stable over time. The results of the monitoring suggest that the Closed North Taieri Landfill approximately 600 m northeast of the Site is not likely to affect groundwater quality at the Site.

Overall Stantec (2026b) has determined that no hydrogeological constraints exist at the Site.

3.9 CONTAMINATED LAND

Potential historic ground contamination is identified in EC Otago's DSI (2026). Sampling has been undertaken by EC Otago to confirm whether HAIL activities occurring on the properties have resulted in soil contamination, intrusive soil.

Soil sampling was collected from 46 locations (D1 – D46, as shown in Figure 3-17) as part of a systematic and targeted approach across areas of interest and compared against the applicable human health Commercial / Industrial and Rural Residential Soil Contaminant

[33] Part B – Groundwater Assessment, Stantec New Zealand, 16 February 2026.

Standards (“**SCS**”) and Soil Guideline Values (“**SGV**”) to indicate human health and environmental risk. An additional 14 samples (A-N as shown in **Error! Reference source not found.**) were then collected to a depth of 0.6 m bgl to refine the contamination extent of the sheds, sheep yards and sheep dip via hand-held X-Ray Fluorescence analyser.



Figure 3-17: Initial Soil Sampling Locations D1 – D46



Figure 3-18: Additional Soil Sampling Locations A – N

In summary, five HAIL sites have been identified on the Site that require remediation with a further two potential HAIL sites found that are unlikely to pose a risk to human health. The remainder of soils across the Site were found to be consistent with predicted background concentrations, with these soils able to be considered 'clean fill' for disposal. Therefore, the provisions of the NES-CS apply to those parts of the Site where HAIL activities have occurred, as set out in Table 3-4.

Figure 3-19 illustrates sampling locations with contaminant concentrations exceeding SCS / SGV (red) and sampling locations with contaminant concentrations above background levels but below SCS / SGV (orange). Areas outlined in red dashed are confirmed HAIL sites and those outlined in orange are possible (unverified) HAIL sites.

Table 3-4: Confirmed and Possible HAIL Activities

Land Use / Activity and Sampling Findings	Extent / Location	HAIL Status	HAIL Category
Sheep dip: Arsenic over 20 times the human health guidelines and exceeding environmental guidelines.	0.6 m deep and covering an area 15 m south, 20 m north, and 5 m east of the sheep dip.	Confirmed	A8: Livestock dip

Land Use / Activity and Sampling Findings	Extent / Location	HAIL Status	HAIL Category
Central woolshed / workshop: Heavy metals above background levels, arsenic exceeding the human health and environmental guidelines, and zinc exceeding environmental guidelines.	Directly adjacent to woolshed / workshop.	Confirmed	I: Any other land
Burn pile: Heavy metals above background levels and arsenic exceeding the human health and environmental guidelines.	Within the suspected burn pile (sample D26).	Confirmed	I: Any other land
Dwellings at 274 and 292 Dukes Road North: Heavy metals above background levels with zinc exceeding environmental guidelines and several locations exceeding human health guidelines for arsenic and lead (samples D23, D24, and D39).	Surrounding the dwellings and associated sheds/garages.	Confirmed	I: Any other land
Northern sheds: Heavy metals above background levels but below human health and environmental guidelines. One sample (D41) reported zinc concentrations exceeding environmental guidelines.	Surrounding the northern sheds.	Possible (unverified)	I: Any other land
Former Royal New Zealand Airforce barracks area: Zinc above environmental guidelines but below human health guidelines.	Sample site D8	Possible (unverified)	I: Any other land



Figure 3-19: Sampling Locations Showing HAIL Activities

3.10 EXISTING NOISE CONDITIONS

Marshall Day Acoustics (2026) has undertaken noise monitoring to quantify the existing noise environment of the Site which includes contributions from:

- Light aircraft flights to / from Taieri Aerodrome - including flight training involving repeated take-off and landing;
- Helicopter movements from Taieri Aerodrome – including night flights from the rescue helicopter;
- Rail movements to / from the Fonterra Mosgiel site;
- Plant noise from the industrial area (Timber Mill site);
- Typical rural noise generators such as farm machinery, birds and insects, and wind; and
- Traffic movements on Dukes Road North.

While aircraft and train activity generate intermittent high noise events, rail movements currently occur during nighttime hours as does road traffic, typical rural noise and plant noise. Overall, the existing noise environment of the Site and surrounding area is considered atypical for the rural area with louder and more frequent occurrences of noise due to the proximity of the industrial area, operation of the Taieri Aerodrome and regular railway movements.

3.11 EXISTING LIGHTING CONDITIONS

Pedersen Read (2026) has undertaken a lighting assessment[34] for the area and the project. Existing light sources in the area are generally low and include rural and industrial sources such as:

- Street lighting associated with intersection of Dukes Road North and Stedman Road;
- Street lighting associated with the Fonterra railway sidings along Stedman Road;
- Signal lighting associated with the railway crossings on Dukes Road North and Stedman Road;
- Minimal exterior lighting from existing residential and farm buildings on the Site;
- Minimal exterior lighting from residential and farm buildings located north, east and south of the Site; and
- Significant 20 m pole floodlighting across the Fonterra distribution centre located west of the Site.

Taieri Aerodrome has minimal lighting as the airfield does not operate during nighttime hours, with the exception of Heli Otago medical helicopter operations which are certified to operate at night without airfield lighting. Overall, the existing lighting environment of the Site and the surrounding area is considered atypical for the rural area due to the proximity of the adjacent industrial area which contains brighter and continuous nighttime lighting associated with industrial activities.

3.12 RAIL NETWORK

The Taieri Branch Rail Line runs adjacent to the western boundary of the Site and is part of the KiwiRail owned rail network, linking to the Main South Line to the south of Mosgiel, providing a rail connection to Dunedin and Port Chalmers. The line runs from south to north, within the KiwiRail corridor, with a light-controlled level crossing located over Dukes

[34] Part B – Port Otago Inland Port Application Assessment of Environmental Effects (Lighting), Pedersen Read, 23 February 2026.

Road North. Currently, an average of 10 rail movements per day occur along the branch line.

Fonterra operates a cold storage and distribution centre on the western side of Stedman Road. The facility has its own railway sidings and there are two light-controlled level crossings on Stedman Road which connect to the sidings within the Fonterra site.

Dunedin Railways currently operate the Taieri Gorge Scenic Train on the existing rail network (including along that part of the network located adjacent to the Site) between Dunedin and Pukerangi (with some services extending to Middlemarch). The train typically departs from Dunedin Railway Station at 9.30 am on a 5.5 hour round trip. Services generally operate Thursday to Monday, with additional daily options or schedule changes during peak seasons (1 May – 31 August). In addition, the train operates an excursion timetable designed specifically for cruise vessel passenger trips and private charters.

3.13 ROADING AND TRAFFIC

Stantec (2026c) has undertaken an Integrated Transport Assessment[35] ("**ITA**") for the area and the Project. The Site is located approximately 3 km east of State Highway 87 which runs north-south through Mosgiel and forms a connection with State Highway 1, the primary strategic road link for the South Island.

Dukes Road North which borders the northern frontage of the Site is a two-lane road with a posted speed limit of 80 km/h and is classified as a 'strategic road' road under the District Plan. Strategic roads are identified as high-capacity roads to provide through movements for freight, tourists and vehicular traffic, and are constructed to accommodate capacity safely and efficiently. The road provides a route east into urban Dunedin via Three Mile Hill and Taren Road and a route west to State Highway 87.

Vehicle access to the Site is currently provided via four formal and two informal vehicle crossings along Dukes Road North.

Stedman Road is a two-lane road bordering the western frontage of the Site and is classified as an 'industrial road' under the District Plan. This road wraps around the industrial and Taieri Aerodrome sites to the west, including two-level crossings with the Fonterra railway sidings, before crossing Silver Stream and connecting into urban Mosgiel via Wingatui Road. The primary role of industrial roads is to provide access to industrial sites with sufficient widths and manoeuvring to accommodate heavy vehicles.

[35] Part B – Integrated Transport Assessment, Stantec, 13 February 2026.

3.13.1 Pedestrian Network

There are no footpaths providing direct pedestrian access to the Site. As shown in Figure 3-20, the existing formed footpaths in the area are discontinuous. A footpath is constructed around the Fonterra site on Dukes Road North, Stedman Road and Odlins Place and there is another section of footpath established towards the Carncross Road intersection on the western side of Dukes Road North.

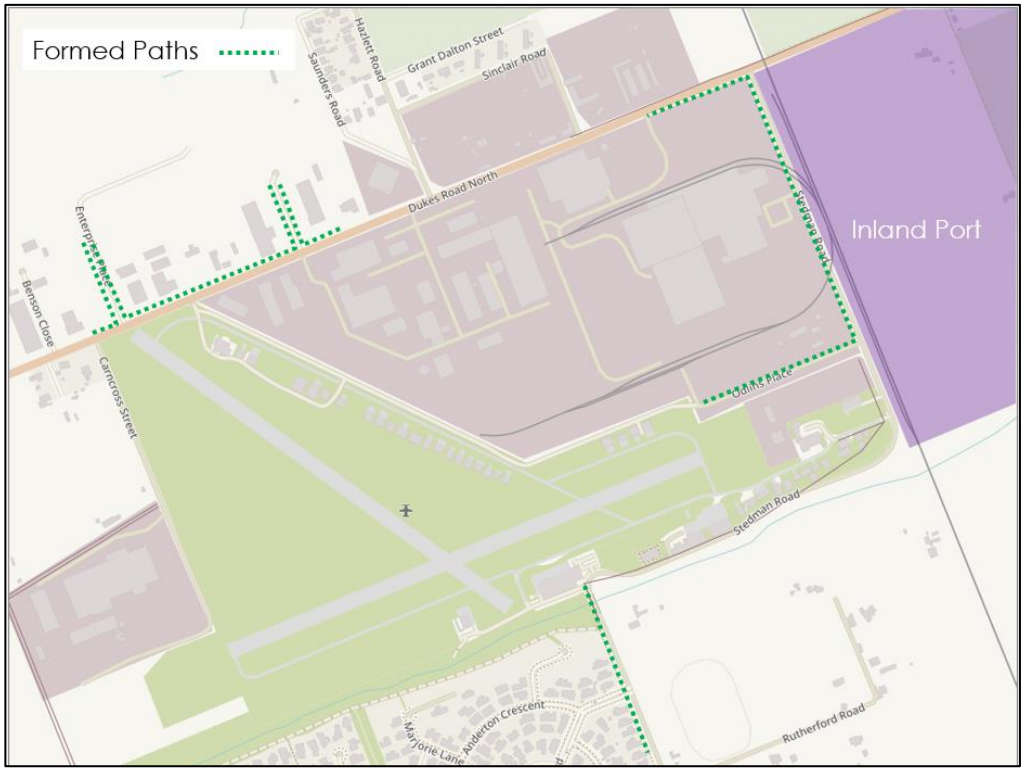


Figure 3-20: Existing Pedestrian Network (shown in green)

3.14 THREE WATERS INFRASTRUCTURE

Stantec (2026d, e and f) has undertaken a Stormwater Assessment[36], Wastewater Assessment[37] and Non-Potable and Potable Water Assessment[38] to inform the internal and external servicing arrangements for the SLIP. An assessment of the existing public three waters reticulation is provided in the following sub-sections.

[36] Part B – Stormwater Assessment, Stantec, 11 March 2026.

[37] Part B – Wastewater Assessment, Stantec, 20 February 2026.

[38] Part B – Non-Potable and Potable Water Assessment, 20 February 2026.

3.14.1 Stormwater

As noted previously, the Site is located upstream of Mosgiel on the eastern Taiari Plains downstream of the North Taiari hills, with two significant watercourses passing near the Site (Silver Stream and Mill Stream). Overland flow towards the Site in flood conditions is dominated by out of bank flow from the Mill Stream Catchment (sized 12 km^2) that cannot fully pass on its main course under a railway line bridge located 700 m north of the Site. This is the predominant driver of flood risk for the Site as the flow eventually overtops Dukes Road North and is then conveyed through the Site towards Silver Stream during events greater than the 2% AEP event.

The depth of this flow path is less than 1 m with overtopping of the railway line occurring when ponding north of Dukes Road North exceeds 27.25 m Relative Level ("**RL**"). Overtopping of the railway line begins to occur at 27.5 m RL, once some flow is already passing through the Site. Culverts are present beneath the railway intersection but cannot convey the full flow to the scheduled drain to the west of the railway line (refer Figure 3-21). Between Mill Stream and the Site there are some small, localised catchments that supplement localised flow toward the Site. These catchments are illustrated within Figure 3-22.

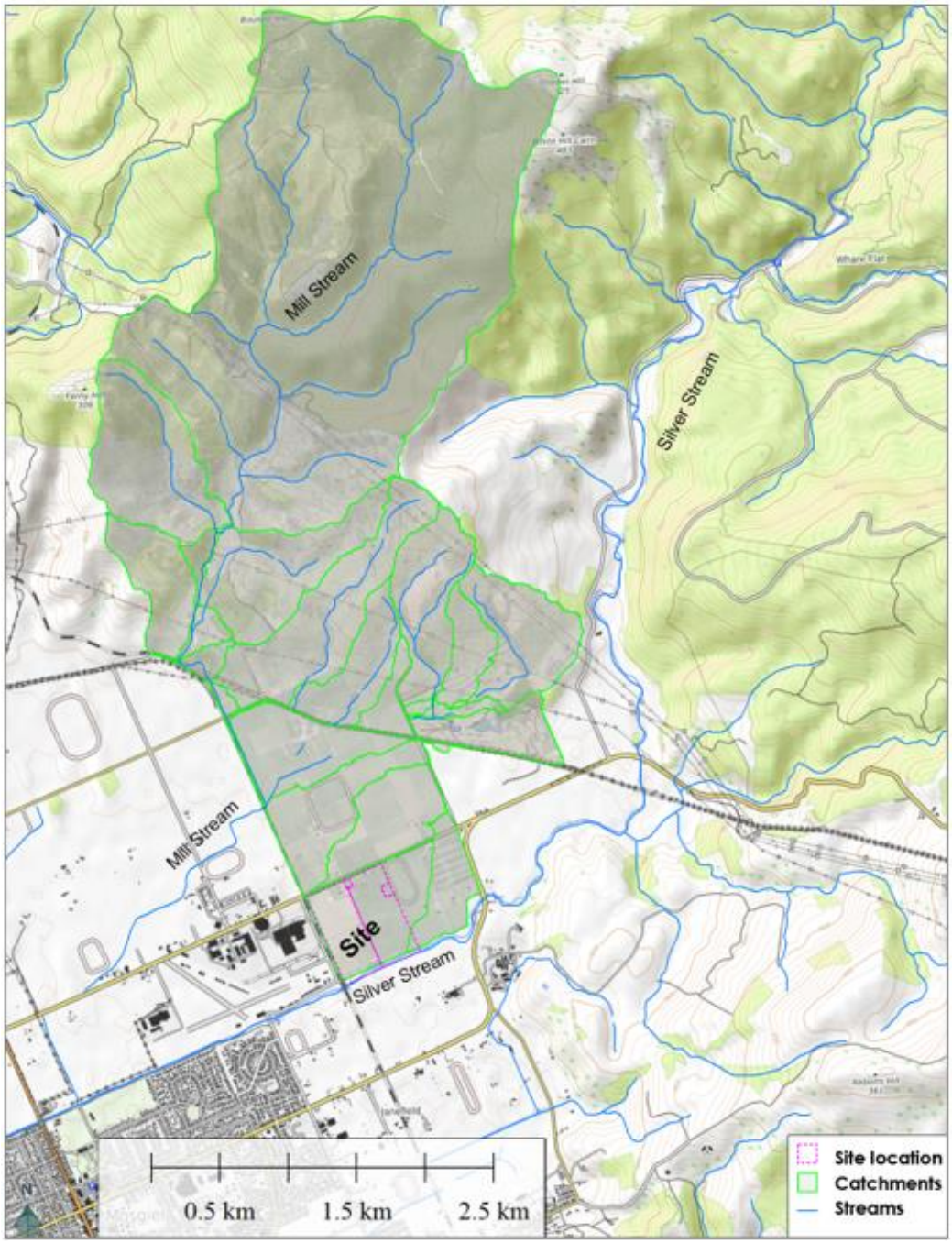


Figure 3-21: Site Location (purple hatch) and Contributing Catchments (green)

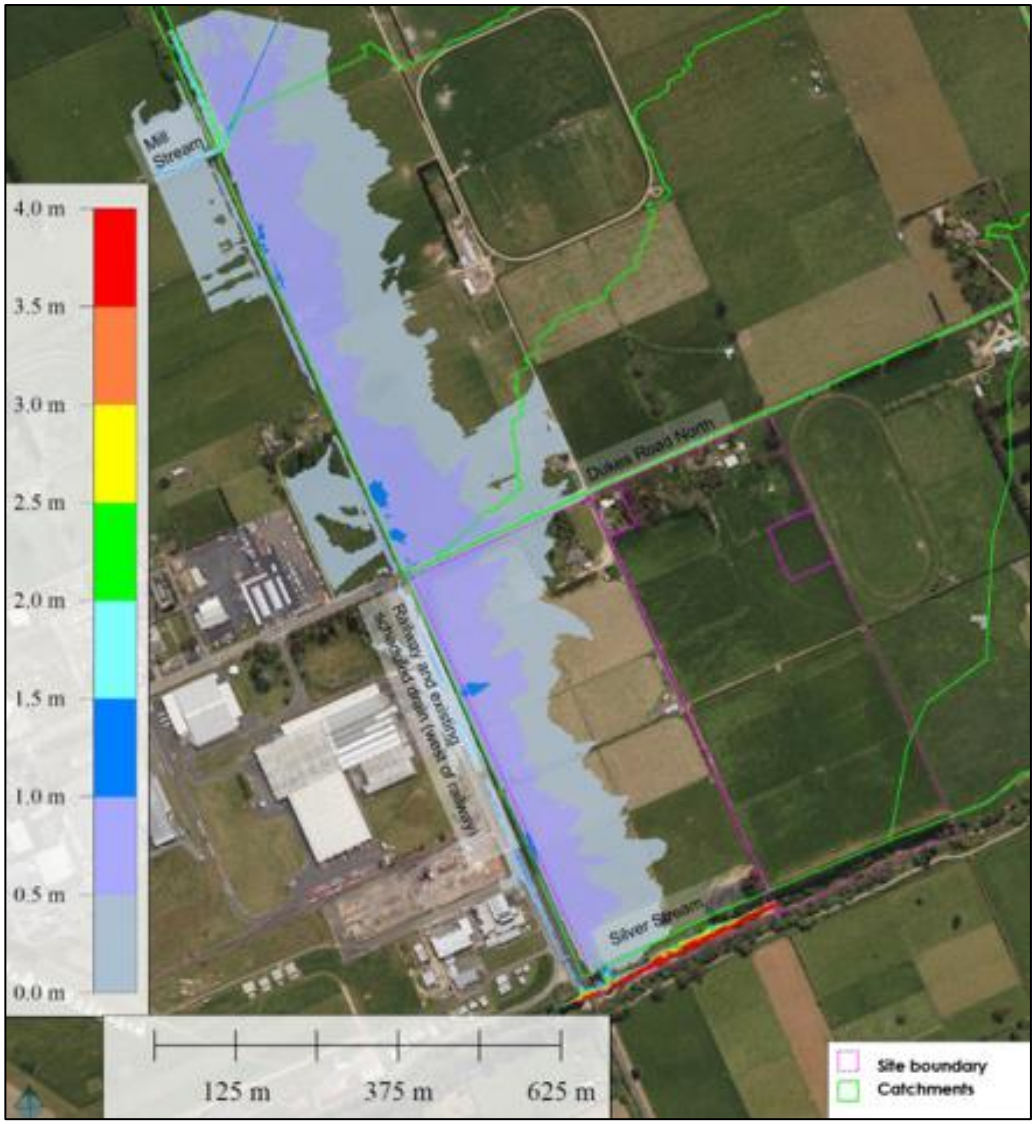


Figure 3-22: Existing 1% AEP (RCP8.5 2080-2100) Maximum Depths

3.14.2 Wastewater

A review of the DCC Water Service Map shows that the following reticulated wastewater assets are present to the west of the Site (refer Figure 3-23):

> A 300 mm PVC pressurised wastewater pipeline (the previously mentioned Fortex Pipeline) on Odlins Place and Stedman Road; and

> A 150 mm gravity wastewater pipeline on Odlins Place.

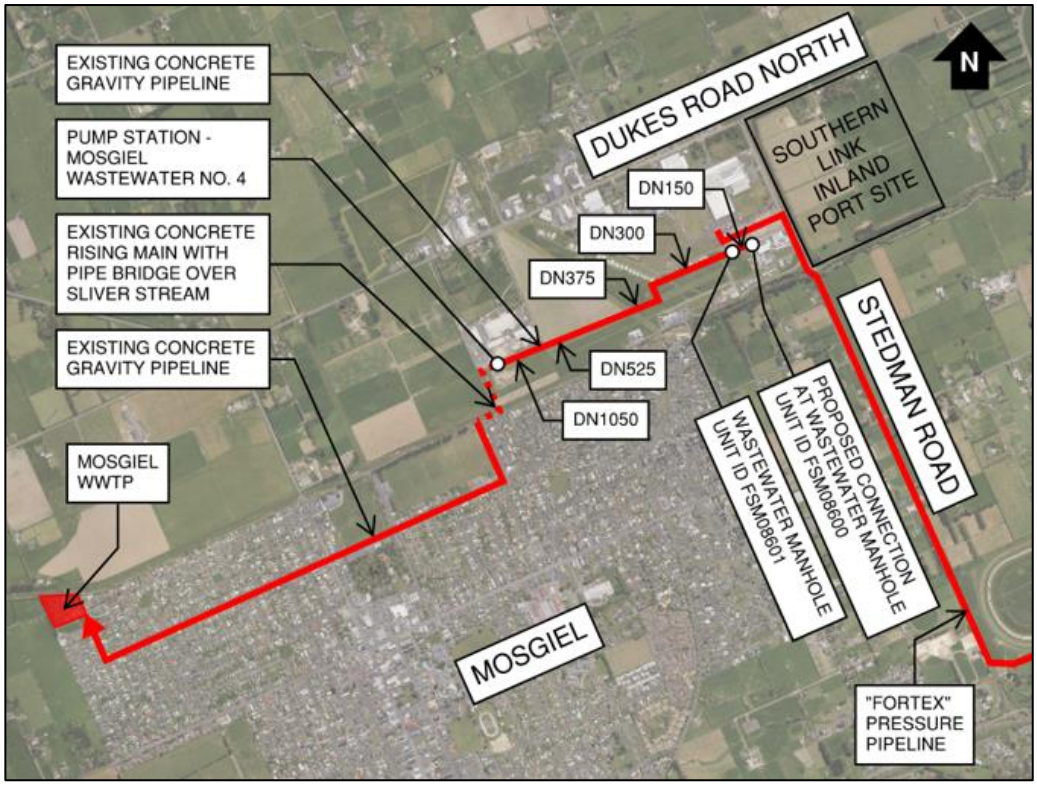


Figure 3-23: Existing Wastewater Infrastructure (red) in Relation to the Site (black)

The Site is currently not connected to the reticulated wastewater network.

3.14.3 Water

There are six piezometers located near the southern boundary of the Site (associated with Consent 2004.225) used for groundwater monitoring of leachate from the closed North Taieri Landfill. Two bores are located near the northern boundary of the Site and used for domestic use and stock water. A copy of the existing land-use consents for these bores is provided in **Part I** of these application documents.

The DCC Water Service Map shows that there are reticulated watermains (as represented in Figure 3-24) along:

> Dukes Road North – a 150 mm steel pipeline; and

> Stedman Road – a 200 mm / 150 mm AC pipeline.

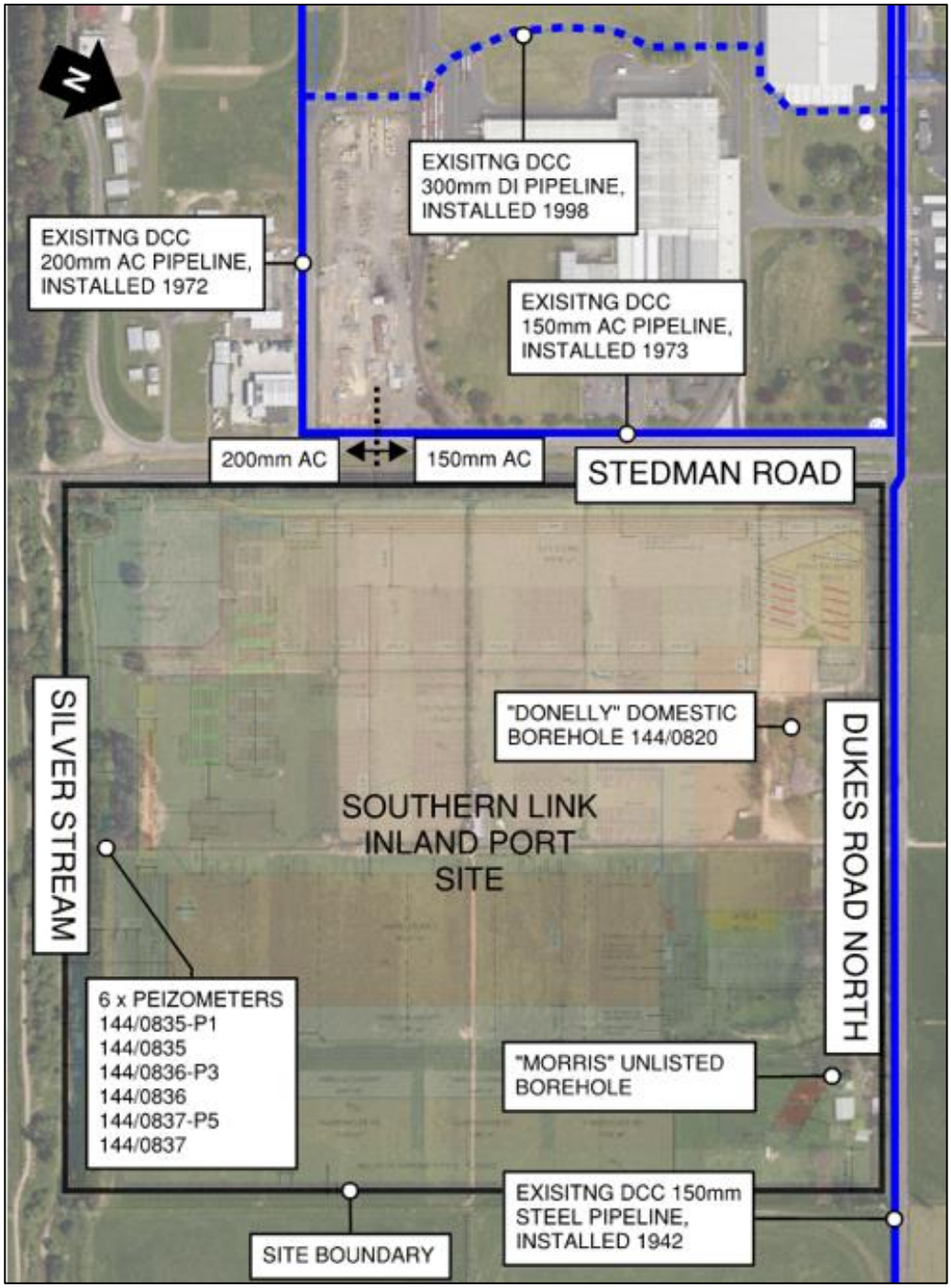


Figure 3-24: Existing DCC Water Supply Infrastructure in the Vicinity of the Site

3.15 CULTURAL VALUES

SLPL recognises that Te Rūnanga o Ōtākou hold mana whenua within the Taiari Plains and acknowledges the relationship mana whenua have with the Taiari Plains area. SLPL acknowledges that it is for mana whenua to describe any cultural or historical associations with the Site and notes Te Rūnanga o Ōtākou are in the process of preparing a fulsome

description of cultural values of the Site and wider area as part of the preparation of a TIA. The following summary of cultural values associated with the Site reflects information shared with SLPL by Te Rūnanga o Ōtākou during the ongoing engagement process.

The Taiari Plains is a landscape of cultural significance to Kai Tahu. The plains, along with the freshwater streams it contains, were a significant source of mahika kai and contained Pā and ancient settlement sites, with significant peaks surrounding the plains providing practical geographical markers and cultural values.

Mauka Atua located along the western edge of the Taiari Plains is a landmark of profound cultural, spiritual, historic and traditional values, and is recognised as a topuni site. The entire mountain is a wāhi tapu (place of restriction) resulting from the presence of an urupā (burial site) on the north shoulder.

In the Indigenous narrative of Otago, the Otago Harbour and rivers on the Taiari Plains were carved out by Matamata, a giant taniwha similar in shape to a serpent or lizard. Matamata was the kaitiaki (guardian) of Te Rakitauneke, a Kāti Māmoe chief who had a pā near the peak of Mauka Atua, and carved out the rivers in search of the chief.

The river, lakes and wetlands in the Taiari Catchment hold significant cultural values for Kai Tahu. The catchment is home to at least 40 taoka species, an important source of mahika kai, a historical transportation and portage network, and contains numerous nohoka (seasonal camping sites). Waterways with an intact mauri will sustain healthy ecosystems and represent the essence that binds the physical and spiritual elements of all things together, generating and upholding all life. Silver Stream (Whakaehu) is a tributary to Taiari Stream and therefore, despite the degraded nature of the river, reflects and holds these significant cultural values for Kai Tahu.

These cultural values inform and support broader cultural values of whakapapa, rakatirataka, mana, kaitiakitaka, manaakitaka, and whānau ora for Kai Tahu.

Section 5.6 of the 'Kāi Tahu ki Otago Natural Resource Management Plan (2005)' addresses cultural landscapes and states that such landscapes are not limited to statutory acknowledgements, stating:

> *"...the entire landscape of Otago is dotted with sites of significance. These places did not function in isolation from one another, but were part of a wider cultural setting that included not only sites as defined by the presence of archaeological remains, but all manner of highly valued places that were named by the earliest inhabitants of the area."*

3.16 ECOLOGICAL VALUES

3.16.1 Terrestrial Ecological Values

E3 Scientific (2026a) has undertaken an assessment of the terrestrial ecological values[39] of the Site assessing the ecological values of flora, avifauna, bats, terrestrial invertebrates and herpetofauna via a desktop study and site visit. The Site is located within the Tokomairiro Ecological District of the Otago Coast Ecological Region.

3.16.1.1 Flora

There are six distinctive vegetative communities on the Site (refer to Figure 3-25), however no Threatened or At-Risk plant species (under the New Zealand Threat Classification System or the Otago Threat Classification System) were identified. Of the 36 plant species observed, four were indigenous (kohukohu (*Pittosporum tenuifolium*), lemonwood (*Pittosporum eugenioides),* koromiko (*Veronica salicifolia*) and *Muehlenbeckia australis*) while the remaining were exotic. The flora is considered to have a low ecological value due to the heavily modified environment consisting almost entirely of exotic plant species with no at risk or threatened native plant species identified. However, as exotic plant species on the Site may still provide habitat and / or foraging for at risk and threatened avifauna species (discussed in Section 3.16.1.2), some areas of the Site are prescribed an overall ecological value of 'greater than low'.

The six vegetative communities on the Site comprise:

- **Grazed pasture:** The predominant planting covering the Site consisting of 16 exotic plant species. These communities are highly disturbed and contain no indigenous planting and are considered to have low diversity and representativeness values. The value of the vegetation itself is considered low, but the area is prescribed an overall ecological value of moderate as it provides habitat and foraging for threatened avifauna species;
- **Shelter belts:** Shelter belts consisting predominantly of exotic plant species divide the Site and are located along some of the Site boundaries. These communities are highly disturbed in comparison to pre-human settlement, containing only two scattered native species (kohukohu and lemonwood, both of which are not threatened), and therefore are considered to have low diversity and representativeness values. A stand of eucalyptus of 4,893 m^2 is located along the border of Silver Stream. The value of the

[39] Part B – Southern Link Inland Port Terrestrial Ecological EcIA, E3 Scientific, 6 March 2026.

vegetation itself is considered low, but the area is prescribed an overall ecological value of moderate as it provides habitat and foraging for threatened avifauna species;

- **Northwest Rank Grassland:** A grassland area is evident in the northwest corner of the Site dominated entirely by exotic rank grass species. These communities are highly disturbed in comparison to pre-human settlement, containing only exotic plant species with a low level of diversity and no important foraging or habitat for indigenous avifauna. The area is prescribed an overall ecological value of low;
- **Stream Edge:** The edge of Silver Stream is heavily modified, lacking native riparian vegetation and dominated by a low diversity of exotic plant species. The value of the vegetation itself is considered low, but the area is prescribed an overall ecological value of moderate as it provides habitat and foraging for threatened avifauna species;
- **Stream Buffer:** Planting within 1 m – 30 m of the edge of Silver Stream is heavily modified, predominantly composed of a low diversity of exotic species with two native species (koromiko (*Veronica salicifolia)* and *Muehlenbeckia australis*) sparsely distributed in the area. The value of the vegetation itself is considered low but the area is prescribed an overall ecological value of moderate as it provides habitat and foraging for threatened avifauna species; and
- **Curtilage Area:** Areas around the existing residential dwellings, farm buildings and infrastructure, railway tracks, and gardens which contain similar species to those identified elsewhere on the Site with some additional species present in the domestic gardens.



Figure 3-25: Vegetation Communities Present

3.16.1.2 Avifauna

The Site includes a variety of habitats potentially utilised by a range of indigenous avifauna species (as identified in Table 3-5). 11 native avifauna species were observed on the Site with only one species, the South Island pied oyster catcher, being classified as threatened, having a National Conservation Status of 'At Risk – Declining' and a Regional Conservation Status of 'Threatened – Regionally Vulnerable'. Observations of exotic species were not recorded due to their limited ecological value. Out of the remaining 10 observed species, seven are classified as at risk or threatened under national and / or regional classifications and are likely to utilise the Site, however their presence was not observed during the E3 Scientific site visits.

The threatened native avifauna species observed to be present or likely to be present on the Site are considered to have high to very high ecological values due to their status.

Table 3-5: National and Regional Conservation Status of Observed Present and Likely Present Native Avifauna on the Site

Species	National Conservation Status	Regional Conservation Status	Likelihood of Occurrence	Frequency of Occurrence
Riroriro/grey warbler *(Gerygone igata)*	Not Threatened	Not Threatened	Present Observed	Resident (year-round)
Pūtangitangi/paradise shelduck (*Tadorna variegata)*	Not Threatened	Not Threatened	Present Observed	Resident (year-round)
Pīwakawaka/South Island fantail *(Rhipidura fuliginosa fuliginosa)*	Not Threatened	Not Threatened	Present Observed	Resident (year-round)
Spur-winged plover (*Vanellus miles novaehollandia)*	Not Threatened	Not Threatened	Present Observed	Resident (year-round)
Tōrea/South Island pied oystercatcher (Haematopus finschi)	At Risk – Declining	Threatened - Regionally Vulnerable	Present Observed	Seasonal foraging
Korimako/bellbird (Anthornis melanura subsp. melanura)	Not Threatened	Not Threatened	Present Observed	Resident (year-round)
Kōtare/sacred kingfisher (*Todiramphus sanctus vagans)*	Not Threatened	Not Threatened	Present Observed	Resident (year-round)
Kāhu/swamp harrier (*Circus approximans)*	Not Threatened	Not Threatened	Present Observed	Resident (year-round)
Tūī *(Prosthemadera novaeseelandiae novaeseelandiae)*	Not Threatened	Not Threatened	Present Observed	Sporadic foraging
Karoro/southern black-backed gull (*Larus dominicanus dominicanus)*	Not Threatened	Not Threatened	Present Observed	Resident (year-round)

Species	National Conservation Status	Regional Conservation Status	Likelihood of Occurrence	Frequency of Occurrence
Kererū/New Zealand pigeon (*Hemiphaga novaeseelandiae)*	Not Threatened	Not Threatened	High	Resident (year-round)
Pīpīwharauroa/shining cuckoo (*Chrysococcyx lucidus)*	Not Threatened	Not Threatened	High	Seasonal
Kārearea/eastern falcon (*Falco novaeseelandiae novaeseelandiae)*	Threatened – Nationally Vulnerable	Threatened – Regionally Vulnerable	High	Sporadic foraging
Warou/welcome swallow *(Hirundo neoxena)*	Not Threatened	Not Threatened	Present Observed	Resident (year-round)
Kawaupaka/little shag (*Microcarbo melanoleucos)*	At Risk - Relict	Threatened – Regionally Vulnerable	Moderate	Resident (year-round)
Māpunga/black shag (*Phalacrocorax carbo novaehollandiae*)	At Risk - Relict	Threatened – Regionally Endangered	Moderate	Resident (year-round)
Pāpango/New Zealand scaup (*Aythya novaeseelandiae)*	Not Threatened	Not Threatened	Moderate	Resident (year-round)
Tauhou/silvereye *(Zosterops lateralis lateralis)*	Not Threatened	At Risk - Declining	High	Resident (year-round)
Tarāpuka/black-billed gull (*Larus bulleri)*	At Risk - Declining	Threatened – Regionally Vulnerable	High	Seasonal – winter migrant feeding ground
Matuku moana/white-faced heron (*Egretta novaehollandiae*)	Not Threatened	Not Threatened	Low	Resident (year-round)

Species	National Conservation Status	Regional Conservation Status	Likelihood of Occurrence	Frequency of Occurrence
Ruru/morepork *(Ninox novaeseelandiae novaeseelandiae)*	Not Threatened	Threatened – Regionally Vulnerable	High	Resident (year-round)
Pūkeko (*Porphyrio melanotus*)	Not Threatened	Not Threatened	High	Resident (year-round)

3.16.1.3 Bats

E3 Scientific (2026a) conducted a desktop review of reported bat detections in the surrounding the Site. A single, unidentified bat species was recorded in the Taiari Plains in 1988. Since then, only one further bat detection in 2023 in the Tokomairiro Ecological District has occurred, however this was south of Balclutha over 70 km away from the Site.

The Site offers limited habitat for bats due to the absence of mature native forests and / or old or dead standing trees with hollows or other features suitable for roosting.

Therefore, with the lack of detections in the wider area and lack of suitable on-site habitat, there is a negligible likelihood of bat presence on the Site, and the Site is therefore considered to have negligible ecological value relating to bats.

3.16.1.4 Terrestrial Invertebrates

E3 Scientific (2026a) considers the lack of onsite indigenous vegetation results in negligible/ poor habitat for native terrestrial invertebrates and therefore a detailed survey of terrestrial invertebrates has not been undertaken.

The largest and most diverse populations of native invertebrate species in New Zealand are generally found in relatively undisturbed indigenous plant communities. In contrast, exotic invertebrate species are more commonly found in modified landscapes such as pastoral grasslands and less than 5% of native insect species have successfully adapted to solely exotic plant communities.

As the Site consists almost entirely of modified and exotic pastoral grasslands and other exotic planting, it is considered to be poor habitat for native terrestrial invertebrates and therefore has negligible ecological values relating to native terrestrial invertebrates.

3.16.1.5 Herpetofauna / Lizards

E3 Scientific (2026a) has undertaken a desktop study and comprehensive lizard survey to determine the suitability and relative abundance of each habitat that supports indigenous lizards. Several species of herpetofauna have geographic ranges intersecting within the Site. The habitat present at the Site has a history of modification and the only species found during surveys were tussock skink (*Oligosoma chionochloescens* - At Risk – Declining). During lizard trapping, only 16 tussock skink were recorded which indicates that the species density at the Site is depleted and not numerous. The tussock skink were recorded in less disturbed habitat with suitable cover along fence lines, shelter belts and curtilage areas.

The extrapolated survey results indicated where tussock skink are "Certain" or "Likely" to occur as shown in Figure 3-26. The results estimate that there could be between 200-300 tussock skink within "Certain" or "Likely" habitat.

Accordingly, tussock skink is afforded a high ecological value score because they are an At-Risk species utilising the exotic habitat.

Based on survey results, the habitats observed at the Site, professional knowledge of populations and distribution, and a desktop review of scientific literature and lizard records, E3 Scientific (2026a) considers that other indigenous herpetofauna species are unlikely to be present at the Site.



Figure 3-26: Tussock Skink Records and Likely Habitat within the Site Boundaries

3.16.1.6 EIANZ Ecological Value, District Plan and Regional Policy Statement Significant, and NPS-IB Significance

E3 Scientific (2026a) has assessed the values of the Site using the criteria outlined in the EcIA guidelines[40] and concludes that all vegetation communities (refer to Figure 3-26) satisfy one or more criteria for identification of significant indigenous vegetation or significant habitats of indigenous fauna, with a moderate overall EIANZ ecological value score. Further, all vegetation communities present values which meet the District Plan, the Operative Otago Regional Policy Statement ("**ORPS**"), the NPS-IBS significance criteria. Further discussion on these evaluations is provided in Sections 9.3.6, 9.3.10, and 9.3.14.

3.16.2 Freshwater Values

E3 Scientific (2026b) has undertaken an assessment of the freshwater ecological values[41] of the Site assessing the water quality, habitat values, macroinvertebrate values, and fish values in Silver Stream. The assessment has comprised a desktop study of available freshwater data for the area and a site visit which involved visual assessment, and

[40] The Ecological Impact Assessment EIANZ guidelines for use in New Zealand: terrestrial and freshwater ecosystems, 2nd edition (Roper-Lindsay, Fuller, Hooson, Sanders, & Ussher, 2018).

[41] Part B – Southern Link Inland Port Freshwater Ecological Impact Assessment, E3 Scientific, 11 March 2026.

instream water and macroinvertebrate sampling within Silver Stream (both upstream and downstream of the Site).

The overall ecological value of Silver Stream in the reach within / adjacent to the Site is assessed as "High" for the following reasons:

- The section is assessed to be moderately representative of Otago waterways with cool, clear, well oxygenated water and a good availability of light for algal growth;
- Due to the presence of a total of five 'at risk declining' or threatened fish species, the stream is assessed to have very high rarity and distinctiveness values;
- The diversity values of the stream are assessed as moderate. The instream habitat is limited with a high proportion of sand, loose gravels and cobbles present and while an average-high diversity of fish species are present, macroinvertebrate communities had an average diversity consisting primarily of pollution tolerant taxa; and
- The ecological context of the stream is assessed to have moderate value. The stream is a flood prone waterway with very limited instream and riparian habitat albeit providing good connectivity to the sea and diadromous fish passage. Shaded areas of the stream have higher ecological values than in downstream channelised open sections.

For completeness, it is noted that no natural inland wetlands are located on the Site.

3.16.2.1 Water Quality

A review of long-term Silver Stream water quality monitoring at two sites upstream (3 Mile Hill Rd approximately 3.2 km upstream) and downstream (Taieri Depot which is approximately 3.8 km downstream) of the Site shows that Silver Stream water quality is very good at both locations albeit with varying nutrient concentrations and faecal bacteria levels.

The results of the water quality samples taken immediately upstream and downstream of the Site show that water quality is generally high and similar across both monitoring sites with the results of both samples being within all guideline levels with the exception if conductivity and nitrate concentrations which exceed the ORC guidelines.

3.16.2.2 Habitat

Riparian vegetation along the extent of Silver Stream within the Site consists almost entirely of exotic species. Bed substrate was generally a consistent loose assortment with a high proportion of sand present. The overall stream habitat at the surveyed upstream and downstream sites were similar although the cobble riffle sampled at the upstream site

showed greater substrate stability compared to the rest of the stream. A small amount of light brown mat algae was present on some stable cobbles at the downstream site, but the majority of gravels were free of algae. The upstream site had less brown mat present, but more thin algae present particularly in shallow slow flowing areas.

3.16.2.3 Macroinvertebrates

Long-term Silver Stream macroinvertebrate monitoring undertaken by ORC at the downstream Taieri Depot site shows that Silver Stream is in a poor state below the national bottom line with respect to macroinvertebrates. The macroinvertebrate community is indicative of severe organic pollution or nutrient enrichment. The communities are largely composed of taxa insensitive to inorganic pollution or nutrient enrichment and the communities have suffered a severe loss of ecological integrity with a general decline measured in macroinvertebrate metrics since 2019.

The results of the water quality samples taken immediately upstream and downstream of the Site show that macroinvertebrate communities are similar at the two sites. Both communities are indicative of mild organic pollution largely composed of taxa sensitive to pollution and a moderate loss of ecological integrity. All metrics were above the national bottom line. The Shannon Diversity Index found the sites both have moderately low diversity with 10-12 species present and abundance dominated by a few taxa. The higher ecological health indicated by macroinvertebrates in this survey when compared to the ORC data and previous survey data is likely to be due to the time of year and the upstream location of the samples. ORC monitoring occurs in the summer months when algal growth and water temperatures are at their maximum.

3.16.2.4 Fish

Historic fish survey and eDNA data was used to describe the likely fish community present and contribute to the assessment of ecological values present adjacent to the Site and the proposed stormwater outfall. A historical survey of Silver Stream undertaken from Stedman Road adjacent to the Site confirmed brown trout, lamprey, longfin eel and redfin bully as present.

An additional eight species have been identified as present at the downstream Taieri Depot site. The Threatened - Nationally Vulnerable lamprey and Taieri flathead galaxias are therefore known in the area along with the At Risk – Declining longfin eel, giant kōkopu and īnanga.

Of the 12 fish species potentially present, as identified in Table 3-6, only four are At Risk - Declining, Threatened. Giant kōkopu, lamprey, Taieri flathead galaxias and brown trout are considered to potentially spawn near the Site. Longfin and shortfin eel spawn at sea and

īnanga spawn downstream in tidally influenced sections of Taiari River. Upstream migration timings for the fish present range from May to November (inclusive) with the exception being eels which will migrate upstream from December to March.

Table 3-6: 2024 Survey Fish Records within Silver Stream at Taieri Depot and Stedman Road

Name	Taieri Depot	Stedman Rd	Threat status
Brown trout	✓	✓	Introduced & naturalised
Longfin eel	✓	✓	At risk - Declining
Shortfin eel	✓	N	Not Threatened
Lamprey	✓	✓	Nationally Vulnerable
Taieri flathead galaxias	✓	N	Nationally Vulnerable
Redfin bully	✓	✓	Not Threatened
Common bully	✓	N	Not Threatened
Īnanga	✓	N	At risk - Declining
Common smelt	✓	N	Not Threatened
Banded kōkopu	✓	N	Not Threatened
Giant kōkopu	✓	N	At risk - Declining
Perch	✓	N	Introduced & naturalised

3.17 LANDSCAPE AND NATURAL CHARACTER VALUES

Mike Moore Landscape Architect (2026) has undertaken an assessment of the landscape and natural character values[42] of the Site.

The Site is located within the northeastern end of the Taiari Plain which includes Mosgiel and the surrounding rural uses. The broader context is the Taiari Plain as a whole, including

[42] Part B – Landscape and Natural Character Effects Assessment, Mike Moore Landscape Architect, 11 March 2026.

the hills defining it on all sides. Given the flat topography and the high degree of screening provided by shelter vegetation, the more specific context is relatively confined and includes the Site as well as adjoining areas within approximately 500m – 1km. This encompasses environments with rural, industrial, and rural residential character.

The Site is characterised by flat rural paddocks used for grazing and cropping, containing three residential dwellings and associated farm infrastructure including shed buildings and shelterbelt planting. The landscape has a rectilinear pattern with roads, fences and hedges all linear and reinforcing the same grid layout. Visual access into the Site is currently modest due to hedges and tree lines along the boundaries.

The District Plan denotes the North Taiari Plain rural landscape as modified and managed with a grid-like layout of fence lines, shelterbelts and a productive land-use activity. Whilst the area is highly modified as pastoral land, the landscape contains an attractive 'mature' character associated with well-ordered productive farmland, trimmed lineal hedgerows, straight roads, and homesteads surrounded by mature exotic trees creating a modest scale where organised close to the carriageway. Industrial development southwest of Stedman Road modifies this near the Site.

Silver Stream is the most obvious natural feature in the immediate landscape defining the Sites southern boundary and incising approximately 7 m into the riverbank. The straight alignment and conformity suggesting historic anthropogenic change.

The stream margins are characterised by rough grass and wilding exotic trees including willow, poplar, sycamore and eucalyptus providing a heightened sense of closure. The stream itself meanders slightly within its bed featuring pools, riffles and small gravel beaches. The vegetation within the stream margins is exotic and weedy and contains no threatened or at-risk plant species reflecting high modification and an exotic dominated community. The natural character is assessed as modest because of the channelisation of alignment, the exotic and weedy margins and water quality affected by run-off from the surrounding rural land.

3.18 ARCHAEOLOGICAL AND HERITAGE FEATURES

The Site is identified as an archaeological site (ID: I44/1500) by ArchSite (operated by New Zealand Archaeological Association Incorporated) due to the presence of pre-1900s features, relating to the presence of Holmhead Farm.

These features are protected under the HNZPT Act 2014 due to dating to the pre-1900s however the Site is not heritage scheduled under the District Plan or listed on the New Zealand Heritage List.

Holmhead Farm was likely established in the late 1850s by John Shaw and at one point consisted of '257 acres subdivided into 10 paddocks, with a two-storey ten-roomed dwelling house, large barn, seven-stalled stable, loose boxes, byre, cart shed and other conveniences'.

The Site was investigated by Lignum Lab in November 2025 who have confirmed the extent of pre-1900's features relating to Holmhead Farm to include a very modified 19th century house, a 19th century hay barn and an array of site features such as a sheep dip, stone alignments and a concrete trough that could potentially be pre-1900s.

SLPL sought, and acquired, Archaeological Authority 2026-362 from HNZPT under the HNZPT Act 2014 for the removal of all above ground visible buildings and archaeology on the site up to the depth of the proposed excavations to form the SLIP.

3.19 PUBLIC ACCESS AND RECREATION

For completeness, it is noted that the Site contains no publicly accessible land or recreational land. There is no publicly accessible riparian margin / esplanade reserve along the northern bank of Silver Stream.

A public walking track is located on the southern bank of Silver Stream outside the boundaries of the Site.

4. APPROVALS SOUGHT UNDER THE FAST-TRACK APPROVALS ACT

4.1 OVERVIEW

SLPL requires (and is seeking) resource consent approvals that would otherwise be applied for under the RMA, under section 42 (4)(a) of the Act.

The FTAA approval requirements are set out in Section 8 of this report and further details of the specific approvals being sought under the FTAA process are outlined in the following sub-sections.

A selection of additional approvals are also required for the Project, with these having been, or to be, obtained outside of the FTAA. These comprise:

- An Archaeological Authority, which has already been obtained by SLPL for works on the Site (Archaeological Authority 2026-362);
- A Wildlife Authority, which will be applied for from the Department of Conservation in relation to the salvage, relocation, and incidental (not directly intended) killing of tussock skink (*Oligosome chionochloescens*) from the Site;
- Any approvals determined to be required under the Freshwater Fisheries Regulations 1983 in relation to works within Silver Stream during the fish spawning season(s);
- Any approvals determined to be required to undertake works within the KiwiRail corridor relating to landscaping, construction of the eastern extent of the western stormwater swale and construction of the eastern extent of the stormwater attenuation pond spillway as detailed in Section 1.9;
- A Civil Aviation Rule Part 77 Determination from the CAA for the Project in relation to the interactions of the SLIP with the operations of the Taieri Aerodrome;
- Approval from ORC under the Flood Protection Management Bylaw 2022 in relation to works located within 7 m of the Scheduled Drain (S3) located to the west of the Site;
- Approval from DCC under the Trade Waste Bylaw 2020 in relation to the discharge of wastewater from the container washbay as a conditional trade waste;
- A Permit to Enter from KiwiRail in relation to undertaking works within the KiwiRail corridor;
- An easement from KiwiRail for the placement of services beneath / under the existing railway line; and

> A Corridor Access Request from DCC in relation to undertaking works within the Dukes Road North road reserve.

4.2 RESOURCE MANAGEMENT ACT 1991

4.2.1 Relationship with Other Consents

Clause 5 (1)(f) of Schedule 5 of the Act requires a substantive application to include a description of any other resource consents required for the project to which the application relates.

As detailed in Section 1.9, some infrastructure to facilitate stormwater servicing and landscaping are situated in the adjacent KiwiRail corridor. Any consents required under the provisions of the RMA will be applied for concurrently with this Application.

No other resource consents are required for the SLIP.

For completeness, it is noted that a well, for rural take (Consent 2001.183), and 3 piezometers, for groundwater monitoring (Consent 95871), have been constructed on the Site. No permit for water take from the well exists as the water take for stock water and domestic supply is a permitted activity under the Regional Water Plan. Utilisation of the well in relation to the SLIP is not required for operation of the SLIP and is not proposed as part of this Application.

SLPL does not hold any prior resource consents for the Site, related directly or indirectly to the proposed activities.

4.2.2 Required Approvals

As required by clause 5 (3)(a) and (b) of Schedule 5 of the Act, a detailed assessment of the approvals required under the RMA, and a detailed analysis of the applicable rules (including identification of those activities which are classified as permitted activities in the relevant statutory planning documents), is attached as **Part G** to this application.

SLPL is seeking approval to authorise activities associated with the construction, use and operation of the SLIP, as described in Section 2, under the relevant provisions of the District Plan, regional plans and National Environmental Standards. Therefore, this Application seeks approval for all consents associated with the activities outlined in this document, including any not identified in **Part G**, that fall within the scope of the described Project.

Proposed conditions of consent for the approvals required are provided in **Part C** of this Application.

The Project does not involve any activities that would be prohibited activities under the RMA.

For those resource consents for which a consent duration is required (i.e. the proposed water permits and discharge permits), SLPL is seeking a 35-year duration for activities associated with the Project.

A 35-year consent duration will enable the Project and its associated benefits (detailed in Section 2.2) to positively contribute to the economic, freight handling, and import and export supply chain environments in Dunedin, the Otago Region, and throughout the country on an ongoing basis.

4.3 RMA APPROVALS REQUIRED

This section describes the resource consent approvals required for the proposal as previously described in Section 2 of this Application and the parts of the proposal that are permitted activities under the relevant plans.

The Site is located within the jurisdiction of the ORC and DCC. The relevant regional and district plans are:

- Dunedin City Second Generation District Plan; ("**District Plan**");
- Regional Plan: Water for Otago; ("**Regional Water Plan**");
- Regional Plan: Air for Otago; ("**Regional Air Plan**"); and
- Regional Plan: Waste for Otago. ("**Regional Waste Plan**").

It is also appropriate to consider relevant National Environmental Standards that may necessitate the requirement for additional consents. In this instance those National Environmental Standards comprise:

- National Environmental Standards for Freshwater 2020 ("**NES-FW**"); and
- National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 ("**NES-CS**").

4.3.1 Dunedin City Second Generation District Plan

SLPL seeks to obtain all necessary land use consents to authorise those activities detailed in this document associated with the construction, use, and operation of the SLIP under the provisions of the District Plan.

As set out in Section 3.6.1.2 (Site Overlays and Controls), the Site is notated with a selection of overlays and controls.

A detailed rule assessment (provided as **Part G**) provides an analysis of the relevant rules and permitted activity standards of the District Plan relating to the Project, and covers the following sections:

- Chapter 4 – Temporary Activities;
- Chapter 6 - Transport;
- Chapter 8A – Earthworks;
- Chapter 9 – Public Health & Safety;
- Chapter 10 – Natural Environment;
- Chapter 11 – Natural Hazards;
- Chapter 13 - Heritage and
- Chapter 16 – Rural Zone.

The following activities require a land use consent under the District Plan:

- Erection of construction cranes for longer than 90 days on the Site that infringe the maximum Rural zone height and the Taieri Aerodrome flight fan mapped area height;[43]
- Alterations to Dukes Road North;[44]
- Large scale earthworks[45] that also:
  - Exceed the maximum cut and fill batter-gradient;[46]
  - Are greater than 600mm in depth within specified setbacks from adjacent property boundaries;[47]
  - Are greater than 350mm in depth and within 1.5m of a watermain and telecom line;[48]
  - Remove high-class soils in a high-class soil mapped zone from the Site;[49] and
  - Are within 20m of the bed of Silver Stream.[50]

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[43] Rules 4.3.2.2, 4.5.1 and 16.6.5 – restricted discretionary activity.
[44] Rule 6.3.2.3 – discretionary activity.
[45] Rule 8A3.3.3 – restricted discretionary activity.
[46] Rule 8A.5.3 – restricted discretionary activity.
[47] Rule 8A.5.4 – restricted discretionary activity.
[48] Rule 8A.5.6 – restricted discretionary activity.
[49] Rule 8A5.8 – restricted discretionary activity.
[50] Rule 8A.5.10 – restricted discretionary activity.

- The operation of lighting that does not comply with the light spill standards;[51]
- Establishment of a new high trip generating activity;[52]
- Establishment of a new major facility inland port;[53]
- The establishment of new buildings and structures that do not comply with all of the development standards being;
  - Construction of buildings, lighting towers and container stacks that exceed the maximum rural zone height of 10m;[54] and
  - Construction of buildings and structures that do not comply with setback requirements from neighbouring sites and Silver Stream water body.[55]
- The establishment of signs that do not comply with the sign standards;[56]
- Provision of over 50 new car parking spaces;[57]
- New access that exceeds the maximum width for a vehicle crossing on the Site;[58]
- Indigenous vegetation clearance – large scale in the rural zone that will also occur within 20m of Silver Stream;[59]
- All other vegetation clearance that will occur within 5m of Silver Stream;[60]
- The establishment of new potentially sensitive activities[61] and new buildings exceeding 60m^2 ground floor area[62] within the Hazard 1 (Flood) and a Hazard 2 (Flood) Overlay; and
- Establishment of shelterbelt boundary planting within 10m of the designated rail corridor.[63]

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51 Rule 16.3.3.1 and 16.5.5 –discretionary activity.
52 Rule 16.3.3.X – restricted discretionary activity.
53 Rule 16.3.3.61 – non-complying activity.
54 Rule 16.3.4.2 and 16.6.5 – restricted discretionary activity.
55 Rule 16.3.4.2, 16.6.10.1 and 16.6.10.5 – restricted discretionary activity.
56 Rules 16.3.4.2, 16.6.7.1, 16.6.7.2, and 16.6.7.3 – restricted discretionary activities.
57 Rule 16.3.4.19 – restricted discretionary activity.
58 Rule 16.3.4.20, 16.6.8, 6.6.3 and 6.6.3.3 – restricted discretionary activity.
59 Rule 16.3.4.22, 16.6.11.2, 16.6.11.3, 10.3.2.1 and 10.3.2.2 – restricted discretionary activity.
60 Rule 16.3.4.23, 16.6.11.3 and 10.3.2.2 – restricted discretionary activity.
61 Rules 16.3.6.2 – non-complying activity.
62 Rule 16.3.6.3 – restricted discretionary activity.
63 Rule 16.6.10.2 – restricted discretionary activity.

The most restrictive activity status of the proposed activities is **non-complying**. Under the 'bundling' principle this is taken to be the overall activity status for the land use consent required under the District Plan.

4.3.2 Regional Plan: Water for Otago

SLPL seeks to obtain all necessary land use consents, discharge permits, and water permits under the Regional Water Plan to authorise those activities detailed in this document associated with the construction, use, and operation of the SLIP. The detailed rules assessment (provided as **Part G**) provides an analysis of the relevant rules and permitted activity standards in the Regional Water Plan relating to the Project, and covers the following chapters:

> Chapter 12 - Water Take, Use and Management;

> Chapter 13 - Land Use on Lake or River Beds or Regionally Significant Wetlands; and

> Chapter 14 - Land Use other than in Lakes or River Beds.

The following activities require consents under the Regional Water Plan:

> A discharge permit for the discharge of stormwater to land and water during construction;[64]

> A discharge permit for the discharge of stormwater to land and water during operation; [65]

> A discharge permit for the discharge of industrial trade waste to land where it may enter water;[66]

> A land use consent for the erection of two spillways in the bed of Silver Stream;[67] and

> A land use consent for the alteration of the bed of Silver Stream during construction of the spillways and during potential slope stabilisation works.[68]

The most restrictive activity status is **discretionary**. Under the 'bundling' principle this is taken to be the overall activity status for the approvals required under the Regional Water Plan.

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64 Rule 12.B.3.1 – restricted discretionary activity.

65 Rule 12.B.3.1 – restricted discretionary activity.

66 Rule 12.B.4.1 –discretionary activity.

67 Rule 13.2.3.1 – discretionary activity.

68 Rule 15.5.3.1 –discretionary activity.

4.3.3 Regional Plan: Air for Otago

A detailed rule assessment (provided as **Part G**) provides analysis of the rules and permitted activity standards for the Regional Air Plan relating to the Project.

All proposed discharges to air for the Project, can be undertaken as permitted activities and therefore, no approvals are required under the Regional Air Plan nor are any sought in this Application.

4.3.4 Regional Plan: Waste for Otago

SLPL seeks to obtain all necessary land use consents and discharge permits under the Regional Waste Plan to authorise activities associated with the construction, use, and operation of the Project.

A detailed rule assessment (provided as **Part G**) provides an analysis of the rules and permitted activity standards in the Regional Waste Plan relating to the Project.

Overall, the following activities require a discharge permit under the Regional Waste Plan:

> The disturbance of land that is or is potentially contaminated.[69]

The activity status under the Regional Waste Plan is **discretionary**.

4.3.5 Resource Management (National Environmental Standards for Freshwater) Regulations 2020

The NES-FW contains standards that regulate activities that pose risks to the health of freshwater and freshwater ecosystems.

A detailed rule assessment of the NES-FW (provided within **Part G**) confirms there are no rule triggers under the NES-FW.

There are no natural inland wetlands located on or in proximity to the Site, no reclamation is proposed as part of the works, and no culverts, weirs, flap gates, dams, or fords proposed in the bed of Silver Stream, and therefore, no approvals are required under the NES-FW.

4.3.6 Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011

The regulations of the NES-CS apply if any HAIL activity or industry is undertaken, has been undertaken, or more likely than not, is being or has been undertaken on the land.

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[69] Rule 5.6.1 – discretionary activity.

A detailed rule assessment (provided as **Part G**) provides an analysis of the rules and permitted activity standards of the NES-CS relating to the Project.

The DSI (provided in **Part B**) concludes that the levels of onsite contamination exceed the applicable Regulation 7 standard in three locations on the Site. Therefore, the proposed land disturbance, due to the volumes of disturbance and removal proposed, and change in use of the land are restricted discretionary activities under Regulation 10(2) of the NES-CS.

The activity status under the NES-CS is **restricted discretionary.**

Overall Activity Status under the 'bundling' principle, the overall activity status for the Application is **non-complying**.

5. CONSULTATION AND ENGAGEMENT

In accordance with Schedule 5 (clause 6(1)(e)) of the Act, this section provides details of the consultation and engagement undertaken by SLPL with administering authorities, iwi and other stakeholders.

SLPL has provided drafts of the technical assessments and plans to administering authorities, iwi and key stakeholders, with the intention being that parties have been provided an introduction to the project, a broad understanding of the potential effects of the SLIP, and the opportunity to provide feedback to SLPL with regard to the management of actual and potential environmental effects.

A summary of the consultation and engagement undertaken, and the key matters which have been raised are outlined in the sub-sections below.

Table 5-1 at the end of this section provides a timeline of the consultation and engagement that has taken place, along with a summary of the feedback provided. SLPL will continue to engage with administering authorities, iwi and key stakeholders as this Application is processed. This will include consultation with neighbouring landowners

5.1 ENGAGEMENT WITH MANA WHENUA

Ngāi Tahu is the principal Māori Iwi of the South Island and is centrally governed by Te Rūnanga o Ngāi Tahu.

Te Rūnanga o Ōtākou, Kati Huirapa ki Puketeraki and Te Rūnanga o Moeraki form the the Kā Rūnaka ki Ōtākou (Kā Rūnaka (tribal councils) of the surrounding region of the Site).

Under a process agreement between SLPL and the Kā Rūnaka, the Kā Rūnaka are responsible for engaging with Te Rūnanga o Ngāi Tahu, and therefore separate consultation by SLPL with Te Rūnanga o Ngāi Tahu is not required.

Te Rūnanga o Ngāi Tahu has confirmed that the position of the Kā Rūnaka on the application is to be regarded as the position of Te Rūnanga.

The Kā Rūnaka, along with Hokonui Rūnanga and Te Rūnanga o Waihao, are equal shareholders of Aukaha which is a consultancy firm that provides resource management services to the Kā Rūnaka. Dr Gail Tipa has assisted Aukaha to prepare the TIA on behalf of the Kā Rūnaka.

Koau Capital are providing project management, administrative and communication services, and economic and financial analysis of the Project, for the Kā Rūnaka. They are also leading engagement with Port Otago/SLPL on behalf of the Kā Rūnaka.

The draft TIA confirms the Site is located solely within the takiwa (local authority region) of Te Rūnanga o Ōtākou who hold tino rakatirataka for the area and therefore requires endorsement from Te Rūnanga o Ōtākou, noting that SLPL has been advised that the TIA will also be endorsed by Kati Huirapa ki Puketeraki and Te Rūnanga o Moeraki.

SLPL is committed to open and transparent engagement with the Kā Rūnaka. Preliminary discussions began in March / April 2025 and have continued to occur on a regular basis.

The engagement that has occurred with mana whenua has included the following:

> A process agreement was entered into between SLPL and the Kā Rūnaka;

> Numerous formal and informal discussions have been had, including an onsite meeting with representatives from the Kā Rūnaka;

> The Kā Rūnaka has been provided draft technical reports to review and comment on;

> Considerations and amendments have been made to relevant technical reports where comments have been raised by the Kā Rūnaka;

> A draft TIA has been prepared on behalf of Te Rūnanga o Ōtākou by Aukaha, which has been shared with SLPL; and

> SLPL has provided updated technical assessments and reporting to the Kā Rūnaka in response to the draft TIA.

SLPL will continue to work in partnership with Te Rūnanga o Ōtākou with respect to the SLIP.

5.2 LOCAL AND ADMINISTERING AUTHORITIES

5.2.1 Overview

While it is not mandatory to consult with the applicable local and administering authorities prior to lodging an application for a referred project (given section 29 of the FTAA applies only to listed projects), SLPL has elected to undertake consultation. In the case of the SLIP, the applicable local and administering authorities are:

> ORC;

> DCC; and

> Ministry for the Environment.

An overview of the consultation undertaken by SLPL can be found in Table 5-1, with summaries of the content also provided in the sub-sections below.

In addition to the pre-lodgement consultation that has occurred, SLPL acknowledges that the local and administering authorities will be involved in the approvals process at several points after the lodgement of the Application, including in relation to:

- The EPA's completeness assessment (section 46(1) of the Act) and subsequent functions in the processing of the Application (section 90 of the Act);
- The Panel Convener's decision to fix any non-default timeframe for the issue of the Panel's decision documents (section 79(2)(c) of the Act);
- The preparation of reports for the Panel as specified in section 51 of the Act or as / if the Panel considers additional reports are necessary (section 67 of the Act);
- The provision of comments on the Application (section 53(2) of the Act); and
- The provision of comments on consent conditions (section 70 of the Act).

5.2.2 Otago Regional Council

Preliminary discussions with ORC regarding the Project began in May 2024. Since then, SLPL has had multiple in person and online discussions with ORC, and ORC has engaged consultants to review the Application documentation on their behalf, as detailed in Table 5-1.

The primary and early discussions with ORC focused on understanding and addressing actual and potential flood risks on the Site, with ORC advising that any development on the Site must achieve hydraulic neutrality and not increase flood risk beyond the Site. SLPL engaged Stantec to design the stormwater system for the SLIP, with the proposed design achieving hydraulic neutrality and avoiding the generation of adverse effects on surrounding infrastructure and properties.

Other key matters discussed throughout SLPL's consultation with ORC have included:

- Notification from ORC that the Taiari River Catchment is fully allocated, and that any development on the Site should not impact the allocation of Silver Stream;
- Confirmation from ORC that the proposed activities do not include any activities prohibited by any of the regional plans;
- Acknowledgement from ORC that approval is likely to be required under the Flood Protection Management Bylaw 2022 for some of the proposed activities; and

- Acknowledgement from ORC that Silver Stream is identified as containing significant habitat for Threatened and At-Risk nature freshwater fish upstream of Wingatui Road and holds a degree of naturalness and cultural value.

SLPL has hosted ORC representatives onsite on a number of occasions and held meetings and workshops with SLPL's technical experts to clarify and discuss feedback on draft technical assessments.

SLPL is committed to continuing to work collaboratively with ORC as the consent conditions for the Project are advanced, and throughout the Project's detailed design phase to ensure all matters of concern are appropriately addressed.

ORC has provided written notice on 5 March 2026, confirming that there are no existing consents to which 124C(1)(c) or 165ZI of the RMA would apply (provided in **Part F** to these application documents).

5.2.3 Dunedin City Council

SLPL first engaged with DCC in January 2025, providing introductory details of the Project, and requesting a preliminary discussion about the SLIP.

Of relevance to this Application, DCC provided comments on the referral application, which included:

- The SLIP would be considered a major facility under the definitions of the District Plan;
- Acknowledgment that port activities are a non-complying activity under the District Plan;
- The FDS identifies the investigation and establishment of an inland freight hub on the Site, noting this occurred in response to transport infrastructure capacity limitations;
- The SLIP aligns with the Zero Carbon Plan 2030 and the goal to reduce emissions in Dunedin; and
- A Mosgiel Transport Study is being prepared which will look holistically at the Mosgiel transport network and expanding on the work undertaken in the FDS. SLPL understands that the study is still being prepared at the time of lodgement of this application.

SLPL has sought DCC's feedback on draft technical assessments prepared for the SLIP and has found DCC's feedback to be particularly valuable in finalising this Application.

SLPL has hosted DCC representatives onsite on various occasions and has held meetings and workshops with SLPL's technical experts to clarify and discuss feedback on draft

technical reports. The review comments provided by DCC have been considered and, where possible, responded to prior to the lodgement of this Application.

The main points raised by DCC are discussed further in the sub-sections below.

SLPL is committed to continuing to work collaboratively with DCC as the consent conditions for the Project are advanced, and throughout the Project's detailed design phase to ensure all matters of concern are appropriately addressed

5.2.3.1 Integrated Transport Assessment

DCC provided feedback on the ITA. The following points were raised:

- The section of Dukes Road North adjacent to the Site will need to be widened, and a right turn bay constructed as identified in the ITA;
- A footpath that provides pedestrian access to the Site should be constructed and connected to the existing footpath on Stedman Road;
- Liaison with KiwiRail is required, specifically in relation to the level crossing area and ensuring the footpath is fit for pedestrians;
- Duke's Road North is a high productivity motor vehicle route and to the south of Stedman Road is formed to an appropriate standard;
- There are known issues on the Mosgiel transport network relating to travel time delay, safety and the volume of heavy vehicles traveling through the town centre;
- The proposed volumes of heavy vehicles are unlikely to significantly worsen existing issues of the Mosgiel transport network; and
- The overall objective of shifting more freight to rail is likely to have a positive effect, especially on carbon emissions, safety and amenity on SH88.

Whilst the feedback provided by DCC on the ITA did not identify specific concerns or issues with the proposed SLIP, the feedback was valuable in highlighting gaps in the draft assessment which have since been resolved, with the ITA provided in **Part B**.

5.2.3.2 Noise and Light Spill

There were no immediate concerns or issues raised in relation to noise and light spill from the SLIP. DCC did request however that an acoustic assessment be provided with proposed noise management and mitigation measures. A Noise Assessment has been prepared by Marshall Day Acoustics and is provided in **Part B**.

5.2.3.3 Three Waters

DCC requested further information for matters related to three waters. Requests related to:

- Details of treated water consumption (excluding fire flows), including clarification of what activities treated water would be used for onsite;
- Firefighting supply;
- Details of how different AEP events would be provided for by the stormwater design;
- Estimated wastewater flow; and
- Activities from which wastewater would be generated.

No specific concerns or issues were identified by DCC, and the requested information has been linked into the Stormwater, Wastewater, and Non-Potable and Potable Water Assessments prepared by Stantec (provided in **Part B**).

5.2.3.4 Geotechnical / Natural Hazards

DCC reiterated the importance of geotechnical and natural hazard considerations, and the need for appropriate coverage of these in the technical assessments supporting the Application.

In particular, DCC identified the significance of stormwater considerations, noting that:

- Stormwater controls and amendments to the existing stormwater processes on the Site need to be reviewed by ORC;
- All stormwater needs to be managed onsite and should not displace stormwater onto any neighbouring sites; and
- Any bunding needs to be lower than the true left flood bank to avoid increasing risk to the residential zone located to the south of Silver Stream.

The feedback provided by DCC has been incorporated into the Stormwater and Geotechnical Assessments prepared by Stantec (provided in **Part B**).

5.2.4 Department of Conservation

As mentioned earlier in this Application, a Wildlife Act Authority is being applied for outside of the FTAA process in relation to the salvage, relocation, and incidental (not directly intended) killing of native tussock skink from the Site.

Engagement with the Department of Conservation regarding the Wildlife Act Authority will be ongoing throughout the preparation, lodgement, and processing of that approval.

5.2.5 Ministry for the Environment

SLPL provided written notice to the Ministry for the Environment on 26 February 2026 of its intention to apply for approvals necessary to authorise the construction, use, and operation of the SLIP under the Act (a copy of which is provided in **Part F** to these application documents).

At the time of lodgement, no response had been provided by the Ministry for the Environment.

As set out in the written notice provided to the Ministry for the Environment, has SLPL extended an invitation to the Ministry for the Environment to attend a project briefing / introductory session if that would be of assistance.

5.3 OTHER RELEVANT PARTIES

5.3.1 KiwiRail

A key feature of this Application is the transition of freight transportation from road to rail. The railway network is owned and administered by KiwiRail, and agreement has been made in principle between SLPL and KiwiRail (refer to the letter provided in **Part F**) for the proposed utilisation of both the corridor located to the west of the Site for SLIP related activities and utilisation of the railway network.

Key matters that have been raised throughout the ongoing engagement with KiwiRail have included:

- Easement considerations over land owned and administered by KiwiRail for stormwater infrastructure and railway services associated with the SLIP;
- Practicalities and schedules of additional train movements; and
- Costs, rates and logistics associated with the SLIP.

SLPL will continue to work collaboratively with KiwiRail to ensure smooth, reliable and efficient transportation movements can be facilitated by the railway network for the SLIP.

5.3.2 Civil Aviation Authority

The CAA has an interest in the SLIP due to the proximity of the Site to the Taieri Aerodrome. The CAA is responsible for regulating civil aviation safety standards as well as managing and regulating the safe and efficient use of the airspace. Correspondence with the CAA has

occurred predominantly via email with a meeting held on 3rd February 2026 to discuss the Project.

The main themes that have been discussed relate to construction activities and building heights. It is possible that the construction of the SLIP could affect the Taieri Aerodrome instrument flight procedures, and a Civil Aviation Rule Part 77 Determination application will be required in order for the CAA to properly assess any potential hazards and risks. As mentioned in this Application, any necessary approval required from the CAA will be obtained.

The CAA also advised that if any permanent structure were to penetrate the OLS within the Taieri Aerodrome Flight Fan mapped area a separate approval would be required.

SLPL will continue engagement with the CAA throughout the preparation, lodgement, and processing of the CAA approval.

5.3.3 Otago Aero Club

SLPL met with Otago Aero Club representatives in November 2025 and provided an overview of the proposed SLIP. The primary discussion points focused on the flight fan which is situated over the Site, the locating of lighting towers adjacent to the rail siding, and the colour of building roofs.

SLPL met with Otago Aero Club again in December 2025 where the following potential aviation safety risks were raised:

- Risk of injuries to pilots and passengers as well as persons on the ground beneath take-off flight paths in the event of an engine failure on take-off from the Taieri Aerodrome;
- Bird strike risk from the stormwater attenuation pond located under the take-off and approach path, and birds roosting on roofs;
- The height of construction cranes which may infringe the approach and landing 1:20 flight fan;
- Glare from Site lighting; and
- Impact on helicopter night flying operations.

The correspondence provided by the Otago Aero Club has been carefully considered throughout the design of the SLIP, with all identified matters appropriately managed with measures such as avoidance of any height breaches of the flight fan, appropriate locating and height of lighting towers, appropriate colour and glare of roofs, the provision of an open space area to provide for emergency landings should they occur on the Site, and the

implementation of ongoing bird monitoring and management to ensure the SLIP does not result in an increase to bird strike rates at the Taieri Aerodrome.

5.3.4 Helicopters Otago

SLPL met with Helicopters Otago representatives on 4th February 2026 and provided an overview of the proposed SLIP.

Helicopters Otago's primary operations are emergency medical services on a 24 hour, 7 day a week basis operating under Instrument Flight Rule operations. Helicopters Otago confirmed that they do not fly over the SLIP, except if a "missed approach" procedure is required in the event that a landing is not possible. The missed approach path requires a turn to the right (south) which may cross over the Site in some situations.

Helicopters Otago does not anticipate the SLIP will result in any restrictions on the Instrument Flight Rule approach and does not anticipate any adverse impacts on its flying operations as a result of the Project.

5.3.5 Neighbouring Properties

In April 2026 SLPL has commenced consultation with neighbouring properties to the Site. Initial contact has occurred via telephone, with SLPL introducing themselves and requesting in person meetings to discuss the SLIP.

In person meetings with the neighbouring property owners and / or residents will commence on 22 April.

The neighbouring properties that have been engaged comprise:

- 176 Milners Road
- 222 Dukes Road North
- 231 Dukes Road North
- 291 Dukes Road North
- 347 Dukes Road North
- 340 Dukes Road North
- 54 Rutherford Road
- 176 Puddle Alley
- 245 Puddle Alley
- 42 Stedman Road
- 58 Stedman Road
- 99 Stedman Road
- 96 Stedman Road
- 1 Odlins Place

Table 5-1: Consultation Timeline and Summary of Feedback Received

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
Otago Regional Council		
7 July 2025	SLPL met with ORC's stakeholder engagement team and the internal engineering team. The purpose was to discuss if Flood Management Bylaw approvals were required, the process and any other considerations. Additionally, discussions were had around allocations for Silver Stream.	ORC stated that any development on the Site needs to achieve hydraulic neutrality. This feedback was provided to Stantec who have prepared the concept designs and will complete the detailed design for the onsite stormwater systems. It was advised that Silver Stream is fully allocated, and any development should not impact the allocations of the stream.
8 July 2025	Email correspondence between SLPL and ORC identifying external consultants who will be working on behalf of ORC. This email also requested comments for the referral application.	ORC nominated external consultants to provide advice on behalf of the regional council. The nominated consultant team was confirmed on 17 October 2025.
4 August 2025	Onsite walkover with DCC 3 Waters team and ORC Natural Hazards team to identify any areas of concerns.	DCC and ORC encouraged by the SLPL's approach with stormwater.
14 August 2025	Site walkover and discussions around the project. Attendees included the ORC Fast-track team and the consultant team (Morphum, BECA and Incite).	ORC provided useful information and guidance with regard to their effects assessment requirements, and their involvement in the application process.

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
4 November 2025	Email correspondence with ORC and consultant team enabling SharePoint access for transparent information sharing. Draft reports were provided, and feedback was requested.	-
6 November 2025	In person meeting with ORC.	ORC shared data information for boreholes in the surrounding environment.
27 November	Workshop with ORC engineering and natural hazard experts.	All parties in attendance were able to identify and discuss critical aspects of the project.
18 December 2025	SLPL updated SharePoint information with draft technical reports that were available for review.	-
13 January 2026	SLPL engaged with ORC to request an update of progress with technical report reviews, to determine if ORC had any feedback on the draft reports, and to enquire if further meetings should be arranged.	No further meetings requested.
9 February 2026	SLPL provided updated a copy of the draft Stormwater Report to ORC.	-
20 February 2026	ORC provided comments on the Ecological Assessments.	The comments provided by ORC suggested SLPL: 1. Review the threat classification of NZ freshwater fauna;

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
		2. Consider potential effects associated with HAIL activities; 3. Provide further information on the nature of the discharge from the Site; 4. Provide further information on construction effects; 5. Provide further information on operational effects; and 6. Provide further information on proposed monitoring programme. These comments were provided to E3 Scientific with updates made to the Freshwater Ecology assessment provided with this Application.
23 February 2026	ORC advised that ORC and DCC have appointed a joint reviewer to review the DSI.	SLPL provided both the ORC and DCC a final draft copy of the DSI and the proposed CSMP and RAP.
27 February 2026	SLPL provided \ copies of the following finalised reports to ORC: Freshwater; Stormwater; Hydrology, Geotechnical, Earthworks / Civil and draft CMP.	-
27 February 2026	SLPL provided ORC a copy of the proposed intersection design from Dukes Road North and a copy of the Earthworks / Civil Report.	-

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
2 April 2026	Workshop with ORC consultant team to discuss peer review comments on the Stormwater and Freshwater Ecology reports.	Agreed some further work required to address some of the points raised. Work underway by SLPL consultant team.
Dunedin City Council		
17 January 2025	Initiate contact with DCC and provide high level overview of the SLIP Project.	DCC to liaise with internal teams and organise a meeting with the relevant experts and SLPL.
12 February 2025	SPLP met with DCC staff, including the relevant experts across the different disciplines.	The primary action out of this meeting was to share the ITA with the DCC team and provide feedback on the draft.
20 February 2025	DCC provided feedback on the documents mentioned above.	A summary of the issues raised in this feedback is set out in Sections 5.2.3.1 - 5.2.3.4 above.
15 May 2025	SLPL updated DCC that the Referral Application had been lodged and provided a copy for their records.	-
1 July 2025	DCC provided comments as part of the Referral Application.	A summary of the matters raised in this feedback is set out in Section 5.2.3 above.
4 August 2025	Onsite walkover with DCC and ORC team to identify any areas of concerns.	DCC and ORC encouraged by the SLPL's approach with stormwater.

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
29 October 2025	Meeting held with DCC team to discuss the proposed activity and present the draft masterplan of the Site.	A detailed discussion occurred around trade waste and foul sewer services. Options and connections for servicing the Site were identified.
4 November 2025	Email correspondence with DCC enabling SharePoint access for transparent information sharing. Draft reports were provided, and feedback was requested.	-
27 November 2025	A combined meeting / workshop was held with ORC and DCC for matters specific to 3 Waters.	All parties in attendance were able to identify and discuss critical aspects of the water servicings for the Site.
19 December 2025	SLPL prepared and delivered a presentation about the proposed development to the Mosgiel Community Board.	No specific concerns were raised by the Community Board outside of the potential impacts from changes in heavy vehicle volumes along SH87. The Community Board requested to be updated as the Project developed.
23 December 2025	SLPL provided a copy of the draft Noise Assessment to DCC's Environmental Health team.	DCC advised that the noise report was comprehensive. DCC expressed the importance of ensuring that the mitigation included in the Noise Assessment is secured by way of conditions of consent. DCC welcomed / supported the opportunity to review the draft conditions.
23 January 2026	Onsite walkover with the Mosgiel Community Board explaining the proposed development.	Two Mosgiel Community Board members attended the walkover. No specific concerns were raised.

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
10 February 2026	SLPL provided final ITA to DCC. A copy of the proposed intersection design proposal and associated civil reporting was also provided on 16 February and 20 February respectively.	DCC confirmed receipt and desire to discuss the updated information at a meeting on 25 February 2026.
25 February 2026	Meeting between SLPL, Stantec and DCC Transport Team. Discussed incorporation of DCC feedback into the updated ITA.	DCC welcomed the updates to the ITA and noted that shunting across Dukes Road North was no longer proposed – this was seen as a positive. DCC want to ensure that pedestrians are provided for along the Dukes Road North frontage of the Site. Discussion around maintenance of the proposed stormwater drains on Dukes Road North. SLPL noted it would be preferable if they retained responsibility for the ongoing maintenance given the importance of the swales to address potential flooding on the Site.
Te Rununga o Ngāi Tahu		
26 March 2025	Preliminary engagement email sent to Ngai Tahu.	-
9 April 2025	SLPL prepared and delivered an introductory presentation to iwi representatives.	Ngai Tahu requested a process agreement to be prepared, and a copy of the slide pack was provided after the meeting.
16 - 18 April 2025	Further correspondence regarding the establishment of the process agreement.	A formal letter was to be prepared by Kāti Huirapa Rūnaka ki Puketeraki, and Te Rūnanga o Ōtākou detailing next steps, including steps associated with the preparation of a process agreement.

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
28 April 2025	SLPL emailed a Ngai Tahu representative offering a follow up meeting to discuss any concerns or issues.	-
29 April 2025	General Counsel for Te Rūnanga o Ngāi Tahu was appointed to draft the process agreement. Email correspondence also explained availability throughout the referral application process.	It was noted, that whilst Te Rūnanga o Ōtākou has a principal interest in the harbour and the Taiari, the wider economic and environmental impacts of the Port and the proposed SLIP also impact Kāti Huirapa Rūnaka ki Puketeraki and Te Rūnanga o Moeraki. Further, efforts to engage to date were recognised and it was noted that consultation could have occurred earlier in the process. The group would not be able to provide comments on the referral application at this time. SLPL responded expressing their commitment to working in partnership with Aukaha (on behalf of Te Rūnanga o Ngāi Tahu). The aim being to obtain a strong understanding of iwi values, views of the Site and surrounds as well as how any effects on these matters can be managed.
15 May 2025	SLPL emailed confirming the referral application had been lodged with the EPA.	-
13 August 2025	Meeting was held with an iwi representative ([redacted]).	Matters discussed included the general framework, the preparation of a TIA and requirements, and the organising of a site visit.

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
14 August 2025	SLPL emailed seeking clarity on the TIA and the process going forward.	Correspondence confirmed that the Kā Rūnaka will prepare the TIA. Aukaha requested oversight of the range of technical assessments commissioned by SLPL. SLPL agreed that draft assessments will be provided to Aukaha for review / feedback.
11 September 2025	Received letter from [redacted] advising the Kā Rūnaka External and Internal Advisory Team [redacted]	Letter contains scope of works [redacted] landscape assessment, cultural values and internal management and governance resources.
29 September 2025	SLPL provided the draft Archaeological Assessment to Aukaha. A question was raised by SLPL on the process for review and whether technical meetings with the iwi would be useful.	Email correspondence confirmed that Aukaha could review technical information.
8 October 2025	Meeting with the Kā Rūnaka and SLPL Executive Team.	Discussion regarding engagement, and establishment of a share folder for application documents. SLPL received confirmation regarding who would be the mana whenua point of contact, and that Aukaha would be providing assessment work for the ecological, treaty impact and landscape topics.
9 – 10 October 2025	Email correspondence between SLPL and Koau summarising the 8 October Meeting	Process of engagement with Koau acting as lead mana whenua contact confirmed. Other process details also confirmed.

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
15 and 29 October 2025	Draft Ecological Reports were available for review and were shared.	-
13 November 2025	Site visit with the Kā Rūnaka was undertaken, and explanations on the proposed activity were detailed.	No major issues raised by the Kā Rūnaka.
2 December 2025	Meeting was held to discuss progress on the TIA.	Koau outlined that the TIA would provide discussion on cultural values. SLPL provided updates on the progression of final versions of technical reports.
18 December 2025	Draft Water, Stormwater and Wastewater reports were available for review and were shared with Koau and the Kā Rūnaka.	Enabled continued development of the TIA.
22 December 2025	Draft Terrestrial Ecology report was available for review and was shared with Koau and the Kā Rūnaka.	Enabled continued development of the TIA.
23 December 2025	Draft Noise Assessment was available for review and was shared with Koau and the Kā Rūnaka.	Enabled continued development of the TIA.
8 January 2026	Draft Landscape Assessment was available for review and was shared with Koau and the Kā Rūnaka.	Enabled continued development of the TIA.
12 January 2026	Feedback was received from Koau on draft Economic Assessment.	Comments raised were addressed in the revised version of the Economic Assessment.

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
19 January 2026	Further questions were received from Koau on draft Economic Assessment.	Comments raised were addressed in the revised version of the Economic Assessment.
4 February 2026	An update on the development of the application and technical reports was provided to Koau and the Kā Rūnaka.	-
9 February 2026	Feedback was provided by the Kā Rūnaka on the draft TIA.	Feedback is summarised in Section 5.1 above. However, some issues identified included: > The ITA does not acknowledge mana whenua engagement and it is not clear whether the benefits listed would extend to mana whenua, whānau-owned businesses or whānau; > The Rūnaka support the direct benefits of the construction phase of the SLIP, but the information provided does not identify whether these benefits extend to mana whenua; and > There is no evidence that the project is economically consistent with the Crown's Treaty Settlement commitments.
18 February 2026	Received draft TIA from Koau. An update was provided to Koau on the development of the application and technical reports.	The draft TIA was shared to SLPL as a working draft, to be shared with the whakaaro of the Kā Rūnaka to identify and gaps and identify potential mitigation measures.

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
23 February 2026	Dr Gail Tipa presented the work completed on the draft TIA on behalf of the Kā Rūnaka to SLPL.	Meeting was attended by SLPL to discuss finding of the draft TIA and
25 February 2026	Meeting was held with Koau, the Kā Rūnaka representatives and SLPL to discuss future structured engagement.	Identification of next steps for structured engagement between mana whenua and SLPL.
27 February 2026	Koau and the Kā Rūnaka representatives provided with an updated package of technical reports for the SLIP.	-
2 March 2026	Email from Koau received to confirm next steps following engagement meeting.	Discussion points summarised and next step were proposed.
3 March 2026	Final Economics Report shared with Koau.	-
4 March 2026	Feeback provided to the Kā Rūnaka on draft TIA.	Feeback included comments to provide additional information and clarification of Project details to inform the TIA.
4 March 2026	Email to the Kā Rūnaka to confirm SLPL is developing a plan for structured engagement with mana whenua in response to discussions held.	The proposed consent conditions will be drafted to reflect the discussions that have been held, including a cultural framework to address matters raised by mana whenua. These will be shared with mana whenua for comment.
KiwiRail		

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
15 April 2025	Meeting was held onsite to introduce the Project to the wider KiwiRail team.	Agreed that SLPL would confirm TEU volumes and the proposed layout to KiwiRail for review with the KiwiRail design team. Agreed that KiwiRail would design various layouts for consideration by SLPL.
15 May 2025	Meeting held to discuss layout design progress and nest steps.	KiwiRail advised they would be distributing the current design drawings for review.
28 May 2025	Workshop held to confirm the rail siding layout.	A recommended siding layout was agreed, [redacted].
13 November 2025	Meeting was held in Dunedin to discuss the utilisation of KiwiRail assets at the SLIP.	Agreed that SLPL would confirm container volumes during Stage 1. [redacted].
21 January 2026	Meeting was held to discuss potential flood risks on the railway network, whether an easement would be required and commercial discussion on rates / fees.	Agreed that SLPL would draft cross sections and prepare easement details for sharing with KiwiRail during the detailed design phase.
10 February 2026	Meeting held in Auckland [redacted]	Further discussion between KiwiRail, Ministry of Business, Innovation & Employment representatives, and SLPL regarding commercial terms. [redacted].
Civil Aviation Agency		

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
30 January 2026	Email correspondence with the CAA detailing the project details and what next steps are if there are any non-compliances with the OLS.	The CAA advised that: > A Form (24077/01A) needs to be filled out and lodged if any proposed buildings will penetrate the OLS at the Taieri Aerodrome; > A Form (24077/01A) will be required if a crane will penetrate the OLS; > If the OLS is penetrated by any building and the crane, two separate forms will be required for each activity; > The application process requires 90 days' notice before any works can occur; and > If no part of the OLS is penetrated due to the SLIP – no further action is required.
3 February 2026	Email correspondence with the CAA regarding matters specific to Part 77 of the Civil Aviation Rules.	The construction will occur using a crane which will be within the Taieri Aerodrome airspace. The crane could affect the instrument flight procedures, this will be assessed, and mitigations will need to be put in place to manage any risk. The CAA Director only has the power, in the Rule, to minimise any hazard as stated in CAR Part 77.21(d)(ii) - 5.0 Airspace. The application process takes 28 days, with the CAA requiring a further 28 days to collate and write the aeronautical study and issue a CAA determination and associated conditions for the operation.

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
Helicopters Otago		
17 December 2025	Meeting held to provide an overview of the SLIP and identify any issues early in the process.	A summary of the matters raised in this meeting is set out in Section 5.3.4 above.
4 February 2026	Meeting held to provide an update on the SLIP application and to discuss aviation safety risks.	A summary of the matters raised in this meeting is set out in Section 5.3.4 above.
Otago Aero Club		
19 November 2025	Meeting held to provide an overview of the SLIP and identify any issues early in the process.	A summary of the matters raised in this meeting is set out in Section 5.3.3 above.
9 December 2025	Meeting held to discuss aviation safety risks.	A summary of the matters raised in this meeting is set out in Section 5.3.3 above.
Taieri Airport Trust (owners of Taieri Aerodrome)		
18 February 2026	SLPL sought to obtain contact details for the Taieri Airport Trust	-
2 March 2026	SLPL has invited the Taieri Aerodrome Trust to attend a meeting to introduce them to the Project and discuss any questions of concerns.	At the time of lodgement, no response has been received.

Consultation Date	Summary of Consultation	Outcome of Consultation / Issues Raised
Neighbouring Properties		
April 2026	SLPL commenced consultation with neighbouring properties via telephone, introducing both SLPL and requesting in person meetings.	Meetings with parties to commence 22 April 2026.

6. ASSESSMENT OF ENVIRONMENTAL EFFECTS

6.1 OVERVIEW

In accordance with Schedule 5 (clause 5 (4), clause 6 and clause 7) of the Act, this section provides an assessment of the actual and potential environmental effects associated with the proposed SLIP.

The information requirements in clauses 6 and 7 of Schedule 5 have been addressed in this section as set out below.

- **An assessment of the actual or potential effects on the environment:**

  The actual and potential effects of the SLIP are assessed in the following sections.

- **If the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use:**

  The activity does not include the use of hazardous installations.

- **If the activity includes the discharge of any contaminant, a description of—**

  - **The nature of the discharge and the sensitivity of the receiving environment to adverse effects; and**

  - **Any possible alternative methods of discharge, including discharge into any other receiving environment:**

  The nature of the proposed discharges (as identified in Sections 2 and 4), and the sensitivity of the receiving environment to adverse effects is provided in Sections 6.7, 6.10, 6.11 and 6.13. These sections include justification for the proposed methods, and why alternatives are not appropriate.

- **A description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity:**

  Descriptions of the proposed mitigation measures are provided in the following sections and further summarised for ease of reference in Section 7 of this Application.

- **Identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal:**

  The persons who may be affected by the activity (including iwi and hapu) and consultation details are included in Section 5 of this Application.

- **If iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision:**

  This is included in Section 5 of this Application.

- **If the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved:**

  The proposed monitoring is set out in the following sections and further summarised for ease of reference in Section 7 of this Application.

- **An assessment of any effects of the activity on the exercise of a protected customary right.**

  There are no protected customary rights identified for the Site.

The assessment of an activity's effect on the environment under clause 5(4) must cover the following matters:

- **Any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:**

  Social and economic effects are assessed in Section 6.3 and cultural effects considered in Section 6.2.

- **Any physical effect on the locality, including landscape and visual effects:**

  Landscape and visual effects are assessed in Section 6.8.

- **Any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:**

  Terrestrial ecology and freshwater ecology is assessed in Sections 6.6 and 6.7**.**

- **Any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:**

  These effects are assessed throughout this section.

- **Any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:**

  The effects relating to discharges are assessed in Sections 6.4.6, 6.7, 6.10, 6.11 and 6.13.

- **Any unreasonable emission of noise:**

  The effects of noise are assessed in Sections 6.15**.**

- **Any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.**

  There are not expected to be any effects through natural hazards or hazardous installations as a result of the Project.

SLPL has commissioned a number of independent experts to provide specialist assessment on the actual and potential effects on the environment. Copies of those reports are provided in **Part B** of these application documents.

The following sub-sections provide a summary of the actual and potential environmental effects of the SLIP and the key recommendations to manage effects, with those measures summarised in Section 7 of this Application.

The relevant actual and potential environmental effects, as summarised in the following sub-sections of this report, are considered to be:

- Positive effects;
- Cultural effects;
- General construction and site remediation effects;
- Effects of loss of highly productive land:
- Effects on terrestrial ecology;
- Effects on freshwater ecology;
- Effects on landscape, natural character and visual amenity;
- Geotechnical effects;
- Effects on groundwater;
- Stormwater effects;
- Non-potable and potable water effects;
- Wastewater effects;
- Transportation and roading effects;
- Noise and vibration effects;
- Lighting effects;

- Effects on risk to aviation safety; and
- Effects on archaeology.

The technical assessments supporting this Application outline measures to avoid, remedy, or mitigate potential adverse effects. As a result, the overall adverse effects of the Project are deemed not significant, with most effects assessed as minor or less. The only aspect identified as having effects greater than minor is the visual impact on certain individual residences and viewpoints. However, proposed measures, such as plantings, aim to reduce the scale and severity of these effects over time.

SLPL proposes to implement the effects management and mitigation measures referenced in the sub-sections below by way of the proposed conditions provided in **Part C** of these application documents. A proposed set of conditions has been drafted for those activities which SLPL is seeking approval for under the Act within the jurisdiction of each administering agency. Specifically, this includes:

- A single land use consent and associated conditions for all activities within the jurisdiction of DCC; and
- Water and discharge permits and associated conditions for the activities within the jurisdiction of ORC.

The proposed conditions for the SLIP have been drafted to address the environmental effects associated with the Project in a robust way. The conditions have been drafted according to best practice principles such that they are enforceable and avoid any subsequent delegation of decision-making functions.

Of note, the resource consents within the jurisdiction of ORC are subject to a set of 'general conditions' along with conditions specific to each consent (where necessary).

Where management plans are relied on to give effect to conditions, the relevant conditions include a clear statement of the objectives that are required to be met by those plans and the key environmental outcomes that must be achieved.

It is proposed that the management plans be certified post issuance of consent with clear guidance set out in the conditions about the process that must be followed to facilitate the certification process.

It is acknowledged that throughout the Panel's consideration of the application and as part of its deliberations there will likely be a need to revisit these conditions to address any new matters that arise or to deal with any new perspectives that might be brought to bear on particular issues. SLPL is committed to a collaborative process whereby further

amendments and refinements can be made to the conditions if and when the need arises at the Panel's request.

6.2 CULTURAL EFFECTS

SLPL recognises that Te Rūnanga o Ōtākou hold mana whenua within the Taiari Plains and acknowledges the relationship mana whenua have with the Taiari Plains area. SLPL understands that it is for mana whenua to describe any cultural or historical associations with the Site, however, has utilised information provided via a draft TIA which includes advice on cultural values as well as feedback on draft technical reports received from Aukaha, to identify what is understood to be key values for Te Rūnanga o Ōtākou.

Cultural landscape values will be impacted by modifications to the landscape resulting from the Project. The open rural landscape character of the Site and channelised form of Silver Stream are already highly modified from their natural pre-development states. However, further modification of the Site and Silver Stream through development of the SLIP and construction of the two stormwater spillways will modify the landscape further, resulting in cumulative adverse effects on the cultural landscape.

Due to the flat nature of Taiari Plains and location of the Site next to existing development, no significant viewshafts to surrounding features of cultural significance will be blocked, being Mauka Atua, Wai-pōtaka, Te Konika o Matamata Pukemakamaka & Turimakamaka, Lakes Waipouri and Waihola and Whakaraupuka Pa. However, due to the visibility of this development from various viewpoints in the catchment, it may diminish the experiential quality of the cultural landscape.

Any adverse effects of the development on water quality in Silver Stream could impact the mauri of Silver Stream, mahika kai practices and taoka species. Construction of the SLIP will be undertaken in accordance with best practices, particularly with regard to remediation, earthworks and sediment and erosion control, to avoid discharge or adverse effects on water quality. Lizard salvage will occur prior to general construction works commencing (noting a Wildlife Permit is not within the scope of this Application), earthworks and vegetation clearance will be carried out in a manner which avoids impacting nesting birds, and fish salvage will occur (with any associated approvals required under the Freshwater Fisheries Regulations 1983 to be obtained outside of the FTAA process) if required for instream works. Boundary planting and natural character enhancement of Silver Stream will be undertaken with plantings to be almost entirely indigenous and ecologically appropriate to the area, providing natural character enhancement.

Stormwater collected on the Site will be treated prior to discharging into Silver Stream to prevent changes to the ecology of the stream. A package of water quality monitoring and

management actions will be required by proposed conditions of consent to ensure water quality is not being adversely impacted. These measures seek to maintain the water quality of Silver Stream with E3 Scientific (2026b) assessing adverse effects on the freshwater ecology of Silver Stream to be low.

Overall, it is considered the Project has made a concerted effort to address adverse ecological effects through adopting best practice construction methods, commitment to stormwater quality monitoring, and implementation of natural character enhancement along that part of Silver Stream located within the Site. The Project also addresses landscape visual effects through implementation of boundary planting for screening and ecological benefit and is supported by the aforementioned natural character enhancement along Silver Stream.

SLPL will welcome the opportunity to review and consider any further methods and measures that can be implemented to support the protection and / or enhancement of cultural values once a final TIA has been provided.

6.3 POSITIVE EFFECTS

6.3.1 Economic Benefits of the Southern Link Inland Port

An Economic Assessment of the SLIP has been prepared by Savvy Consulting (2026) and is provided in **Part B** of this Application.

The assessment concludes that when accounting for quantified and qualified economic benefits, and the extent of those benefits spatially and according to the range of businesses and wider industries positively impacted, the proposed SLIP:

- Will deliver significant regional benefits;
- Will generate national benefits given the interaction of the Project with other industries (e.g. the dairy and meat industry), and the importance of the other industries to the national economy; and
- Will support increased efficiency of nationally significant infrastructure (Port Chalmers) which will generate wider economic benefits.

6.3.1.1 Construction Benefits

Construction of the SLIP will constitute a major construction project in the context of both the Dunedin and Otago economies, with significant generated expenditure and full-time employment opportunities presented across a broad range of industries in Dunedin, Otago and throughout the rest of New Zealand.

It is estimated that the 10-year construction period of the SLIP will generate an estimated $47.7 million in direct value added, increasing to $191.3 million in value added once indirect and induced impacts are included, with 95% of that value to be experienced in the Otago regional economy.

The construction of the SLIP will support a total employment equivalent (direct, indirect and induced) of 262 FTEs in Stage 1, 282 FTEs in Stage 2, and 28 FTEs in Stage 3 spread nationally over nine core sectors. Over the 10-year construction period of the SLIP, the total cumulative employment impact is 1,489 FTE jobs with a total of 420 of those FTEs to be in the Otago Region.

Dunedin's economy reduced by 0.5% over the last year, the Otago Region's employment dropped by 0.4% in the last year, and the regional economy had zero growth in the year ending March 2025. In this economic climate, large development projects such as the SLIP are even more significant, with the net present value of the SLIP's value-added construction impact equating to 2% of Dunedin GDP and 1% of Otago regional GDP.

6.3.1.2 Long Term Employment Opportunities

The SLIP is expected to generate gross 125 FTE long-term employment roles spread across the three stages, making the SLIP a significant employer in the Otago Region. These roles are anticipated to present across the development stages as:

- Stage 1: 53 FTE
- Stage 2: 58 FTE
- Stage 3: 14 FTE

21 of these FTEs will be transferred from existing Port Otago and Dynes Transport facilities, meaning there will be a net increase of 104 FTEs in the region. These positions will be associated with the container terminal and depot, bulk warehousing, fast moving consumer goods, warehousing and MPI / compliance services.

The additional FTEs will generate a 4% increase to the regional transport, postal, and warehousing industry filled jobs, with the possibility for further growth in this area if there is any future expansion of the container trade enabled by the facility.

6.3.1.3 Improving Natural Hazard Resilience

The SLIP will significantly enhance the resilience of supply chains and regional infrastructure by addressing key vulnerabilities in the existing logistics system. The primary arterial road (SH88) connecting Dunedin to Port Otago is prone to slips, flooding and closures during

heavy rain and natural hazard events. The SLIP will shift container transport to rail which is less vulnerable to such disruptions.

The SLIP will provide critical buffering capacity for export containers, accommodating delays caused by shipping disruptions and providing additional storage which presently is not available at the existing terminal at Port Chalmers.

6.3.1.4 Reduced Greenhouse Gases

The SLIP will provide a pivotal role in supporting the transition to a low-carbon economy by significantly reducing greenhouse gas emissions associated with freight transport, as identified in the DCC's Zero Carbon Plan 2030[70]. This is achieved through a predicted 70% CO_2e saving from the mode-shift of freight from road to rail. There is also potential for value added manufacturing to agglomerate in Mosgiel, reducing freight costs and travel times. A significant shift of 15,000 one-way vehicle movements or 30,000 return vehicle movements from road to rail will optimise freight movement seeing 93% of exports arriving to Port Chalmers via rail, reducing heavy vehicle movements and lowering transport emissions on urban Dunedin roads and State Highways. It is anticipated that this could result in an emissions reduction of 261 tonnes of CO_2e per annum across the transport, postal, and warehousing industry, which if scaled up across the approximately 30,000 heavy truck movements could reduce 1,050-1,100 tonnes of CO_2e per annum across impacted supply chains. This would provide a 70% reduction in harmful pollutants from existing supply chain routes, providing associated health benefits, and contribute to a reduction in greenhouse gas emissions when compared to a business-as-usual scenario.

6.3.2 Container Operations Consolidation Benefits

The SLIP will allow for and facilitate the consolidation of logistics and container activities within the Otago Region. The direct benefits of these consolidation activities will include:

- Release of high-value Port Chalmers and Dunedin City land for other uses, noting that Mosgiel is the most cost-effective location to consolidate (and expand) Port Otago's container business outside of Port Chalmers;
- Creation of significant additional full container terminal capacity, reducing the risk of 'leakage' if container capacity is reached and Port Chalmers is unable to accept more containers;

[70] zero-carbon-plan-2030.pdf – Theme 2: Shift to Low Carbon Transport Modes; Action Area 18 Support Freight to Shift to Rail and Coastal Shipping.

- An overall increase in buffering capacity for container exports, improving 'just in time' delivery of export containers, which in turn:
  - Improves the efficiency of container handling at Port Chalmers;
  - Improves the resilience of export supply chains; and
  - Avoids potential disruptions to export dairy and meat production.
- Improved economies of scale for depot and warehousing activities (improved efficiency and productivity);
- Increased resilience of supply chains to natural hazards, weather events and other potential disruptions through creation of a large multi-modal accessible hub that is geographically separated from Port Chalmers;
- Increased utilisation of KiwiRail infrastructure (Initial uplift of 15,000 containers per annum (30,000 TEU), with foreseeable projected growth to 25,000, 35,000 and 40,000 containers per annum);
- Significant reductions in heavy vehicle traffic movements and heavy vehicle kilometres travelled annually within the Dunedin urban area, along SH88, and in Port Chalmers. An estimated 15,000 heavy (one-way) truck movements annually will be removed from urban Dunedin roads once Stage 1 of the Project is completed, with these reductions expected to increase as Stages 2 and 3 of the SLIP are completed;
- Improved container transport productivity (time savings);
- Unlocking significant growth potential for warehouse capacity (including modern, fit-for purpose warehousing) at the SLIP; and
- Net reductions in $C0_2e$ emissions and general pollutants per annum as a result of the shift of freight from road to rail. Every tonne of freight delivered by rail will generate an approximately 70% $C0_2e$ emissions savings when compared with the use of diesel heavy-goods vehicles.

6.3.3 Regional Export and Import Sector Growth

It is anticipated the operation of the SLIP will facilitate economic growth in Dunedin and the Otago Region as a result of:

- Improving the attractiveness of the Otago Region and the wider Southern Region for new export and import manufacturers and processors (as a place to invest and do business), potentially facilitating growth in GDP and employment opportunities;

- Improving the ability of Port Otago to compete with other South Island seaports, facilitating an increase in the market share of existing / established export and import trade with-on economic impacts (GDP and employment) across a range of sectors in Dunedin and the Otago Region;
- Consolidating export freight coming out of Southland onto rail (where feasible to do so), magnifying the benefits of the rail mode shift; and
- Providing opportunities for value added manufacturing to support existing export customers by creating greater economies of scale for new manufacturing businesses / activities in the Mosgiel area.

6.3.4 Summary of Inland Port Benefits

In summary, Savvy Consulting (2026) considers that the SLIP in Mosgiel will deliver:

- Generation of approximately $191.3 million in value added impacts over a 10 year period;
- 1,489 FTEs over a 10-year period;
- 104 high value permanent new jobs and 21 transferred positions;
- Avoiding 1,050- 1,100 tonnes/annum (net) of CO2e over a 10-year period;
- Increased utilisation of 15,000 containers per annum (30,000 TEU) of KiwiRail's existing rolling stock and track assets between Mosgiel and Port Chalmers; and
- A 15,000 (one-way) reduction in heavy truck movements from urban Dunedin roads over a 10-year period.

This represents significant regional and national economic benefits in the short, medium and long-term.

6.4 GENERAL CONSTRUCTION AND SITE REMEDIATION EFFECTS

The construction period for the SLIP is approximately 36 months for Stage 1, 24 months for Stage 2 and 60 months for Stage 3. A sequential staging approach has been adopted to provide the necessary certainty from an investment and demand management perspective.

Construction works will typically occur during standard daytime working hours, from 7.30 am to 6.00 pm Monday to Saturday, with no works to occur on Sundays or public holidays.

General construction effects associated with the establishment of the SLIP include:

- Construction traffic;

- Construction noise and vibration;
- Construction lighting;
- Earthworks;
- Discharge of sediment / sediment laden stormwater;
- Discharge of dust during construction works;
- Management and remediation of contaminated soils; and
- Temporary construction fencing.

The CMP will establish appropriate protocols for the management of all construction activities associated with the SLIP including construction traffic management, erosion and sediment controls, earthworks management, contaminated soils management, construction noise, stormwater during construction, construction lighting, water supply, dust control, spill prevention, complaints, and recording and monitoring procedures. This content can be seen in the draft CMP which forms part of the Application and is found in **Part D**.

Proposed conditions of consent require the preparation and implementation of a CMP to manage the potential construction effects associated with the SLIP. The conditions of consent require that the CMP is certified by DCC to ensure it is fit-for-purpose.

6.4.1 Construction Traffic Management

Construction traffic associated with the SLIP is not anticipated to impact on the operational capabilities of the road network. All construction traffic effects will be temporary and incremental, with peaks during mobilisation and demobilisation of each development stage.

6.4.2 Construction Noise and Vibration

Marshall Day Acoustics (2026) undertook an assessment of the likely noise and vibration that will be generated from the construction activities including earthworks, noise wall construction, concrete pad establishment, piling and establishment of buildings, and onsite machinery and vehicles.

Marshall Day Acoustics predicts:

- All construction noise can comply with the District Plan daytime construction noise limit of 70 dB L_{Aeq} at all nearby noise sensitive receivers; and
- The highest construction vibration experienced by the closest sensitive receiver (the dwelling at 273 Dukes Road North) will be less 1 mm/s PPV and only just perceptible to

the receiver. All construction vibration will therefore comply with the District Plan daytime construction vibration limit of 2 mm/s PPV.

Given the predicted compliance with the permitted activity standards in the District Plan for construction noise and vibration, it is considered adverse effects of the construction noise and vibration will be acceptable.

Despite the predicted District Plan compliances, a condition of consent is proposed requiring the provision and implementation of a CMP (refer to draft provide in **Part D**) which includes measures to ensure any limited occurrences of unanticipated nighttime construction activities are undertaken in accordance with best practice, including ensuring compliance with the nighttime construction noise and vibration limits of the District Plan. The CMP will be provided to DCC for certification prior to the commencement of construction activities.

Overall, with the implementation of the above mitigation measures, Marshall Day Acoustics assesses the temporary residual adverse effects of construction noise and vibration as minor or less (particularly given compliance with the District Plan).

6.4.3 Construction Lighting

Pedersen Read (2026) has identified temporary construction lighting during low natural light levels could result in adverse glare as well as causing confusion for pilots operating out of Taieri Aerodrome (with the construction lights potentially being mistaken for airfield ground lighting). Temporary construction lighting also has the potential to increase sky glow, generate noticeable change for neighbouring properties, disturb local fauna in the Silver Stream, and increase insect activity on the Site, which will potentially increase the risk of bird strike of foraging birds to aircraft using the airfield.

Pedersen Read (2026) has therefore recommended the following management measures to address the potential construction lighting effects:

- Construction activities are limited to standard daytime working hours, apart from limited circumstances e.g. during winter, when it gets dark early or stays dark later, or when early morning starts are required for specific activities;
- Temporary construction lighting shall be minimised, positioned and shielded to avoid illumination of the Silver Stream edge and riparian margin, and limited to no more than 3 lux above the southern acoustic wall; and
- Construction lighting mitigation measures are to be detailed in a CMP and subsequently implemented during construction works.

As already identified, a condition of consent is proposed requiring the provision and implementation of a CMP to ensure construction activities are undertaken in accordance with best practice and will include details of construction lighting management methods to manage the effects of the lighting. The CMP will be provided to the operator of the Taieri Aerodrome for their review and feedback and provided to DCC for certification prior to the commencement of construction activities.

Overall, with the implementation of the above mitigation measures, Pedersen Read assesses the residual adverse effects of construction lighting to be less than minor.

6.4.4 Earthworks and Sediment and Erosion Control

Significant bulk earthworks are proposed across the Site which has the potential to result in adverse earthworks, and sediment and erosion and effects which can lead to instability, impacts to groundwater and freshwater quality, and impacts to aquatic ecosystems.

All earthworks will be undertaken in accordance with best practice and will occur progressively to ensure the adverse effects are avoided. Sediment and erosion controls will be implemented prior to earthworks commencing and maintained for the duration of the associated earthworks to ensure their effectiveness.

Management measures for the proposed earthworks will also be provided in the CMP, to be prepared and implemented as a condition of consent, which will include detailed earthworks design plans and content and performance indicators of various earthworks control methods.

Preparation and implementation of an Erosion and Sediment Control Plan (included within the CMP) is proposed as a condition of consent which will detail how erosion and sediment control will be managed (including any individual / specific management measures required for each development stage), as well as identifying associated performance indicators to be met. The Erosion and Sediment Control Plan will be submitted to DCC for certification prior to the commencement of works.

Overall, earthworks will be undertaken in accordance with best practice measures (to be identified and detailed in the CMP), and in accordance with detailed Erosion and Sediment Control Plans ensuring adverse earthworks, erosion and sedimentation effects are appropriately avoided or mitigated.

6.4.5 Dust Management

There is potential for dust to be generated during bulk earthworks activities due to the nature and scale of the activities proposed. Standard dust suppression and management practices

will be implemented including the staging of earthworks, hydroseeding of any bunds or stockpiles, and water application / spraying (as necessary). Management measures for the proposed earthworks will be provided in the CMP, to be prepared and implemented as a condition of consent, which will include detailed content and performance indicators of methods to control dust during earthworks.

With the implementation of these practices via the CMP, it is considered any dust effects generated by the bulk earthworks will be appropriately avoided or mitigated.

6.4.6 Site Remediation

The DSI prepared by EC Otago (2026) has identified contaminants existing in sufficient quantity to be a risk to human health and the environment within several discrete areas within the northern extent of the Site. Disturbance of the contaminated soils within those areas therefore has the potential to result in adverse effects on human health and the environment if not undertaken in a controlled and managed way.

To avoid potential adverse effects associated with the contaminated soils, site remediation activities comprising either the capping / encapsulation of the affected soils or the removal of the soils (or a combination of both) will occur early in the proposed work programme.

A CSMP and RAP (which will both form part of the CMP) have been prepared for the Site (provided in draft form in **Part D**). All site works will be undertaken in accordance with the provisions of a CSMP and RAP to manage risk to human health, prevent contaminant migration to offsite ecological receptors during development, and avoid cross-contamination of clean soils, avoiding potential adverse effects from the disturbance of the contaminated soils.

Validation sampling will take place following the remediation activities to confirm that the contaminants exceeding the guidelines protective of human and ecological health have been removed or encapsulated to prevent human health effects and avoid effects on ecological receptors. The results of the testing will be presented in a Site Validation Report, along with a description of the work performed regarding the contaminated soils.

In the event contaminated soils and materials need to be encapsulated, the Site Validation Report will also include an Ongoing Management Plan to ensure that any residual ongoing contamination risk is minimised.

To ensure the works are undertaken in accordance with best practice, conditions of consent are proposed requiring the provision of a CSMP and RAP to DCC for certification prior to the commencement of earthworks. This will ensure any adverse effects from disturbance and remediation of the contaminated soils on the Site are adequately avoided.

6.4.7 Stream Works

Construction of the two stormwater spillways associated with the western and eastern swales will require works within the extent of Silver Stream.

All works to construct the two stormwater spillways in Silver Stream will be undertaken in accordance with conditions of consent which require:

> Minimisation of the extent of instream works as far as practicable; and

> Works avoiding fish spawning times where practicable and / or implementation of appropriate measures so to ensure any effects on fish spawning are minimised as far as practicable (and the obtaining of any necessary approvals under the Freshwater Fisheries Regulations 1983 should such approval be required).

As previously discussed above, all earthworks will be undertaken in accordance with Erosion and Sediment Control Plan (included in the CMP), with preparation and implementation of such a plan for each development stage as proposed in the conditions of consent.

The separation of clean and dirty water flows via clean water diversion bunds and dirty water bunds will ensure sediment-laden water is not discharged to Silver Stream. All stages of earthworks will implement super silt fencing to intercept sediment from stormwater runoff before it reaches Silver Stream.

To ensure the proposed mitigation measures are adequately managing the adverse effects of earthworks and construction, a condition of consent is proposed requiring aquatic habitat and macroinvertebrate surveys upstream and downstream of the Site. The findings of the surveys will be provided to DCC and ORC with assessment against appropriate guidelines and baseline data to determine if the management measures are operating effectively and if further management measures are required.

This combination of mitigation and monitoring measures will ensure adverse effects on Silver Stream resulting from works within the bed of the stream will be appropriately avoided, remedied or mitigated.

6.4.8 Temporary Construction Fencing

Temporary construction fencing will be erected around the construction works as construction progresses and will comprise standard New Zealand metal framed construction fencing.

The fencing will provide a barrier to prevent people from entering the construction site, maintaining health and safety, and will include fencing scrim providing a visual barrier to the construction works taking place (reducing any risk of distractions to drivers of vehicles passing the Site).

This construction fencing will be temporary and will be in place until such time that the permanent fencing of the SLIP is erected. Given the temporary nature, standard size and protective functions of the fencing, it is considered any adverse effects associated with the erection of the fencing will be less than minor.

6.4.9 Construction Effects Conclusion

Overall, it is considered that the construction of the SLIP will limit any adverse effects to those anticipated by the District Plan and Regional Plans. In addition, management and mitigation measures will be implemented via the CMP.

In light of the above, any potential construction effects are considered to be less than minor.

6.5 EFFECTS OF LOSS OF HIGHLY PRODUCTIVE LAND

As the Site is located on land identified as highly productive land, the Land Assessment prepared by AbacusBio Limited (2026) evaluates whether the SLIP Site meets the exemption pathway for use and development of highly productive land subject to permanent or long-term constraints as set out in clause 3.10. of the NPS-HPL. AbacusBio Limited (2026) assess the suitability and economic viability of the Site against the use of the highly productive land for land-based primary production.

In summary, AbacusBio Limited (2026) determines that the SLIP meets the exemption criteria relating to permanent or long-term constraints under clause 3.10 of the NPS-HPL as:

- The evaluation demonstrates that permanent and long-term constraints relating to location, soil drainage and flooding risk mean that land-based primary production cannot be viably sustained (economically) on the Site for at least 30 years. The reasonably practicable options evaluated are sheep and blueberry farming (clause 3.10(1)(a));
- The development of the SLIP avoids significant loss of productive capacity, avoids fragmentation of large and geographically cohesive HPL, cannot avoid and therefore mitigates reverse sensitivity effects on surrounding land-based primary production (clause 3.10(1)(b));

- The existing environmental, social, and economic values of the Site as HPL are limited, and when weighed against the wider benefits of the proposed development, the overall balance favours the development and operation of the SLIP (clause 3.10(1)(c));
- A full evaluation of reasonably practicable alternative land-based primary production, land management improvements, boundary adjustments, and alternative production strategies has been undertaken which confirmed the permanent and long-term constraints on economic viability (clause 3.10(2)); and
- Consideration of future productive potential and landholding impacts (clauses 3.10(3)) and the size of the land holding (clause 3.10(4)) further support this conclusion.

As the SLIP meets the exemption criteria relating to permanent or long-term constraints under clause 3.10 of the NPS-HPL, the effects from the loss of primary-production land have not been assessed.

6.6 TERRESTRIAL ECOLOGY EFFECTS

E3 Scientific (2026a) has undertaken an effects assessment of the SLIP on terrestrial ecology. Overall, it is concluded that with the implementation of recommended mitigation and management measures the residual level of effects will be very low to low. These mitigation and management measures are outlined further in the following sub-sections.

6.6.1 Loss of Vegetation

The Site is dominated by exotic vegetation, with 32 of the 36 flora species recorded being exotic species, and the majority of vegetation consisting of grazed exotic pasture.

Four indigenous flora species have been identified on the Site, however these species are not classified as Threatened or At-Risk. The species are:

- Kohukohu (*Pittosporum tenuifolium*);
- Lemonwood (*Pittosporum eugenioides*);
- Koromiko (*Veronica salicifolia*); and
- *Muehlenbeckia australis*.

Whilst the habitats comprise grazed pasture dominated by exotic species, E3 Scientific (2026a) has identified the grazed pasture as a 'significant' habitat for tussock skink, and the South Island pied oystercatcher – as well as providing potential habitat for the black billed gull and eastern falcon.

The SLIP will result in an estimated vegetation clearance of 38 hectares, with the majority of the clearance being grazed pasture and exotic flora species with low ecological value, and clearance of a small extent of native non-threatened flora species. The Site has been previously modified from its natural state with all onsite vegetation having been planted and not naturally occurring. E3 Scientific (2026a) therefore assesses the level of effect of vegetation clearance following the implementation of mitigation measures as very low to low.

Notwithstanding the above, the vegetation on the Site does provide habitat for avifauna and lizards, and the loss of this habitat will have an impact on this fauna. These effects are addressed in Section 6.6.2 of this document.

6.6.2 Loss of Habitat

The proposed clearance of vegetation on the Site will result in loss of foraging and nesting habitat for Threatened / At-Risk avifauna species (South Island pied oystercatcher, eastern falcon, little shag, black shag, black-billed gull, red-billed gull, morepork and silvereye) and the loss of approximately 5.64 hectares of habitat for tussock skink.

The loss of habitat and associated construction works/earthworks have the potential to disturb, displace, or incidentally injure or kill these avifauna, including nesting and unfledged birds, and the tussock skink, resulting in potential adverse effects on these species.

E3 Scientific (2026a) has recommended the following management measures to address the effects of the habitat loss, as provided for in the conditions of consent:

- Undertaking of avifauna surveys prior to removal of vegetation greater than one metre in height during the avifauna breeding season (August to March) to identify if any nests are present. If nesting birds are found, felling is not to commence until fledglings have left the nest;
- Undertaking of avifauna surveys within five days prior to of any earthworks undertaken during the South Island Oystercatcher breeding season (August to February) to identify if any nests are present. If nesting birds are found, earthworks are not to commence until fledglings have left the nest, or earthworks are to occur outside a buffer around the nest approved by a suitably qualified and experienced professional; and
- Vegetation along the bank of Silver Stream is to be retained (with the exception of pest or weedy species which will be removed).

SLPL is required to obtain a Wildlife Act Authority for the salvage and relocation of tussock skink from the Site (as well as incidentally harming / killing these species – not intentional),

and lizard salvage and relocation will be required prior to construction works commencing on the Site. Preparation and implementation of a Lizard Management Plan for the Site will be required as part of obtaining the Wildlife Act Authority.

The objective of the Lizard Management Plan is to set out actions for the safe removal of lizards from the Site and relocate them to a protected, pest-managed area capable of supporting their long-term persistence, and will include details relating to:

> Salvage methodology;

> Salvage effort required;

> Timing of salvage;

> Methodology for handling and release of lizards;

> Release site requirements including habitat creation, pest control within the release site and long-term protection of lizards; and

> Monitoring requirements post-release of lizards.

Overall, given the highly modified nature of the Site, minimal disturbance to the vegetation around Silver Stream, prevalence of similar habitats in the surrounding area, and proposed implementation of the above impact management measures, E3 Scientific (2026a) assess the level of effect of habitat loss on Threatened or At Risk avifauna as very low to low and on tussock skink as low.

6.6.3 Bird Strike

The Site provides habitat for avifauna and there is an existing potential for collisions of avifauna with aircraft (known as bird strike) operating out of Taieri Aerodrome to the west of the Site. Bird strike events can result in the death of the struck avifauna - the aviation effects of bird strike are discussed in Section 6.17 of this report.

The SLIP has the potential to increase risk of bird strike as a result of the following aspects potentially attracting birds to the Site:

> Planting onsite vegetation;

> Construction of a stormwater attenuation pond, although this will largely be dry with the exception of limited periods following wet weather events; and

> Construction of buildings that may provide roost and nesting locations.

E3 Scientific (2026a) has recommended preparation and implementation of a Bird Monitoring and Mitigation Programme for the Site to provide ongoing management of bird

activities and to ensure the risk of bird strike is minimised. E3 Scientific (2026a) recommends the programme should include protocols for management of the stormwater attenuation pond (i.e. ongoing sediment removal, lining etc), installation of bird deterrent measures, grassing of exposed stockpiles during earthworks, removal of roosting and perching opportunities on any structures (where possible) and monitoring to ensure deterrent measures are effective.

A condition of consent is proposed to prepare, and subsequently implement, a Wildlife Hazard Management Plan for the Site that will include a bird monitoring and management programme. This programme will include but not be limited to:

> Detailed content and performance indicators of a bird monitoring and management programme which seeks to ensure bird strike rates associated with the Taieri Aerodrome do not increase with the construction and operation of the SLIP;

> Detailed content and performance indicators of bird deterrent measures which are to be implemented on buildings and structures to decrease roosting and perching opportunities within the Site;

> The process for identifying further actions required should bird monitoring identify that deterrent measures are not operating effectively; and

> Reporting requirements to DCC.

The Wildlife Hazard Management Plan will be provided to the operator of the Taieri Aerodrome for their review, prior to being submitted to DCC for certification. This review and certification process, and implementation of the finalised Wildlife Hazard Management Plan, will ensure the risk of bird strike from birds being attracted to the Site will be monitored and managed on an ongoing basis, minimising the potential for bird deaths.

Overall, E3 Scientific (2026a) assesses the level of effect of bird strike on Threatened or At Risk avifauna as very low to low.

6.6.4 Noise Disturbance

The construction of the SLIP will involve the utilisation of construction machinery associated with site preparation and building works. Marshall Day Acoustics (2026) identify that daytime construction noise levels are anticipated to reach up to 70 dB L_{Aeq} on the Site which will be above current ambient levels and are anticipated to have the following ecological impacts on avifauna:

> Habitat avoidance or displacement due to aversion to noise;

- Disruption of breeding, nesting, and foraging particularly during peak activity periods for birds and other wildlife; and
- Acoustic masking interfering with communication, territory defence or predator / prey detection.

Mitigation for the construction noise effects on avifauna includes minimisation of night-time construction, construction noise being generally short-term and not chronic, and there being an abundance of similar habitat in the surrounding area that will allow disturbed avifauna to avoid the noise impacted areas and recolonise following the completion of construction works.

Unlike construction noise which is temporary in nature and will only occur for certain hours of the day, operational noise of the SLIP from machinery, container operations and human presence will be ongoing. The operational noise may generate the following potential ecological effects on avifauna:

- Ongoing habitat degradation due to persistent noise exposure leading to reduced occupancy by noise-sensitive fauna;
- Long-term shifts in species composition favouring disturbance-tolerant species, resulting in a loss of biodiversity; and
- Barrier effects, where noise discourages fauna from using adjacent habitat fragmenting ecological connectivity.

Any construction and operational noise effects on tussock skink are expected to be negligible as lizard salvage and relocation is proposed to be undertaken prior to the commencement of works on the Site.

E3 Scientific (2026a) has recommended the following impact management measures to address the effects of noise:

- Acoustic walls to be installed in locations to appropriately provide for noise mitigation throughout development stages 1, 2, and 3;
- Construction noise to be limited where possible as per the CMP;
- Loud construction noise near the Silver Stream to be limited to short time frames where possible as per the CMP; and
- Prepare and implement a Lizard Management Plan for the Site to translocate individuals prior to construction, to be provided as part of a separate Wildlife Act Authority application (refer to Section 6.6.2).

Overall, given the relatively short-term and intermittent nature of construction noise, relatively similar noise levels at the Site boundaries to existing ambient noise, and proposed implementation of the above mitigation measures, E3 Scientific (2026a) assesses the level of effect of noise on Threatened or At Risk avifauna as very low to low and on tussock skink as very low.

6.6.5 Vibration Disturbance

The SLIP will include vibration generating activities during both construction and operation. Marshall Day Acoustics (2026) has predicted that vibration will comply with the District Plan limits for construction and operational vibration.

Any construction and operational vibration effects on tussock skink are expected to be negligible as lizard salvage and relocation is proposed to be undertaken prior to the commencement of works on the Site.

E3 Scientific (2026a) has recommended the following impact management measures to address the vibration effects:

- Monitor use of the Stream Edge and Buffer area by Threatened and At Risk avifauna species prior to construction and during operation. If there is a distinguishable difference in behaviour or occupancy, a length of stream will be replanted at a suitable site within the Ecological District and plantings will be maintained until greater than 90% native cover is achieved; and
- Prepare and implement a Lizard Management Plan for the Site to translocate lizards prior to construction, to be provided as part of a separate Wildlife Act Authority application (refer to Section 6.6.2).

Suitable monitoring will occur prior to construction along the stream bank of Silver Stream for the purpose of monitoring the use of riparian vegetation in this area by Threatened and At Risk avifauna species, as provided for by a condition of consent. If a reduction in use by Threatened and At Risk avifauna species is observed, a consent condition is also proposed requiring restoration planting along a similar length of stream within the same Ecological District. Overall, given the prevalence of similar habitats in the surrounding area and proposed implementation of the above impact management measures, E3 Scientific (2026a) assesses the level of effect of vibration on Threatened or At Risk avifauna as very low to low and on tussock skink as very low.

6.6.6 Light Disturbance

Artificial light at night is known to interfere with avifauna behaviour by altering circadian rhythm, increasing daily vigilance behaviour and foraging times, effecting navigation, and causing deviation towards and potential collision with artificially lit buildings.

Mitigation for the construction lighting effects on avifauna includes minimisation of night-time construction, acknowledging construction lighting being generally short-term and not chronic, and there being an abundance of similar habitat in the surrounding area that will allow disturbed avifauna to avoid the impacted areas and recolonise following the completion of construction works.

Unlike construction lighting which is temporary in nature, permanent lighting during operation of the SLIP will include floodlights, towers, and lights with control systems. Elevated light levels attract insects to the light source, which can disrupt local food webs. This may negatively affect species that rely on insects for food such as tussock skink, however lighting effects on tussock skink are expected to be negligible as lizard salvage and relocation is proposed to be undertaken prior to construction.

E3 Scientific (2026a) has recommended the following impact management measures to address the lighting effects on terrestrial ecology, as provided for in the conditions of consent (**Part C**):

- All lighting down-facing with zero tilt and shielded to minimise light spill;
- External lighting will be <3,000K including the road closest to the Stream Edge and Buffer;
- Limited internal areas will be ≤4000k but no spill will occur outside the Site boundary (including to the Stream Edge and Buffer);
- Monitor Threatened and At Risk avifauna species use of the Stream Edge and Buffer prior to construction and during operation. If there is a distinguishable difference in behaviour or occupancy, a length of stream will be replanted at a suitable site within the Ecological District and plantings will be maintained until greater than 90% native cover is achieved; and
- Prepare and implement a Lizard Management Plan for the Site to translocate individuals prior to construction, to be provided as part of a separate Wildlife Act Authority application (refer to Section 6.6.2).

Suitable monitoring will occur prior to construction along the stream bank of Silver Stream for the purpose of monitoring the use of riparian vegetation in this area by Threatened and At

Risk avifauna species, as provided for by a condition of consent. If a reduction in use by Threatened and At Risk avifauna species is observed, a consent condition is also proposed requiring restoration planting along a similar length of stream within the same Ecological District.

Overall, given the prevalence of similar habitats in the surrounding area and proposed implementation of the above impact management measures, E3 Scientific (2026a) assesses the level of effect of lighting on Threatened or At Risk avifauna as very low to low and on tussock skink as very low.

6.6.7 Species Introduction

The introduction of non-native species through imported goods has the potential to impact on ecological values beyond the SLIP and within the wider Ecological District.

E3 Scientific (2026a) has recommended the comprehensive biosecurity measures be implemented for the Site to prevent, detect, and control of biosecurity threats including (but not limited to) the management of invasive weeds. The plan must ensure that all operational activities are aligned with national biosecurity standards and that appropriate monitoring and response protocols are in place. It is also noted that biosecurity already represents a critical concern for any port environment, necessitating compliance with stringent national and international security standards.

Following the implementation of the above impact management measures, E3 Scientific (2026a) assesses the level of effect from introduced species on Threatened or At Risk avifauna as very low to low and on tussock skink as very low.

6.6.8 Increased Human Activity and Increased Predators

Increased human activity associated with the SLIP may attract introduced predators to areas where food and shelter is readily available. Increased mammalian presence can lead to predation pressure on ground nesting birds, skinks and invertebrates and spread pestilence at the Site and in its surrounds.

E3 Scientific (2026a) has recommended the implementation of a predator control and waste management measures to address potential effects from increased human activity and potential predators. The measures are to cover the Site, targeting feral cats, possums, mustelids, and rodents and traps will need to be regularly maintained and checked in line with best practice guidelines. The condition set requires measures to be implemented that achieve the intention of these predator and waste recommendations by E3 Scientific.

Following the implementation of the above impact management measures, E3 Scientific (2026a) assesses the level of effect from increased human activity and predators on Threatened or At Risk avifauna as very low to low and on tussock skink as very low.

6.6.9 Effects on Terrestrial Ecology Summary

E3 Scientific (2026a) considers that with the implementation of the recommended management and monitoring actions, the impact of the SLIP development and operation on terrestrial ecology will be very low to low.

The recommended management and monitoring actions have been provided for within the proposed conditions of consent (refer **Part C**) appropriately addressing the actual and potential effects of the SLIP on terrestrial ecology.

6.7 FRESHWATER ECOLOGY EFFECTS

E3 Scientific (2026b) undertook an assessment of the effects of the SLIP on freshwater ecology and quality.

The potential effects of the SLIP on freshwater values include:

- Potential discharge of sediment to Silver Stream associated with construction activities;
- Potential effects associated with the construction of two new discharge outlets with associated spillways into Silver Stream;
- Potential discharge of contaminants to Silver Stream once the Site is operational; and
- Potential for changes to the flow regime of Silver Stream.

6.7.1 Construction Effects

Site remediation, in general accordance with best practice and the draft CSMP and RAP, will occur prior to general earthworks commencing ensuring no contaminants from the identified contaminated soils on the Site will be discharged to Silver Stream.

All development stages of the Project include earthworks which will be undertaken in accordance with best practice erosion and sediment control measures to avoid the discharge of sediment to Silver Stream. Preparation and implementation of an Erosion and Sediment Control Plan for each development stage of the Project is a proposed condition of consent with controls and sediment retention ponds to be established and utilised progressively in alignment with the staged earthworks of the Site.

Efforts will be made for the construction of two stormwater spillways located within the extent of Silver Stream to occur outside of the fish spawning times of 1 May to 31 November.

In the instance that construction works cannot avoid the fish spawning season, salvage and surveying of fish will occur in accordance with an associated condition of consent, and any necessary approvals required under the Freshwater Fisheries Regulations 1983 will be obtained. As any in-water works will not occupy the entire width of Silver Stream, fish passage will be maintained and no adverse effects on fish migration are anticipated.

To ensure construction effects on Silver Stream are managed sufficiently, E3 Scientific (2026b) recommends the following suite of management actions and monitoring measures:

- Earthworks should be undertaken primarily during stable weather conditions and sediment attenuation pond maintenance should occur in line with Auckland Council (2016) guidelines;
- Planting of the swale between the stormwater attenuation pond outlet and Silver Stream should occur adjacent to rock lined sections wherever possible, with native plantings above the winter base flow level to reduce sediment erosion reaching the bed of Silver Stream;
- If avoidance of fish spawning times of 1 May to 31 November by in-water works is not possible, fish salvage should be undertaken following the National Work in Water Guidelines (MfE, 2021) and additional trout redd and cobble surveys for fish eggs should be undertaken by a suitably qualified ecologist. If any trout redds are found, they are to be avoided and if any riverbank eggs are located, the instream works should be delayed until after the next flood event. Should such works require approval under the Freshwater Fisheries Regulations 1983, such approvals will be obtained prior to the undertaking of the works;
- Aquatic habitat and macroinvertebrate surveys at upstream and downstream survey sites should be replicated annually in Spring during Stage 1 of the project to verify earthworks are being effectively managed and Silver Stream ecology is remaining stable; and
- An annual report should be prepared and submitted to ORC within 3 months of fieldwork, assessing results next to appropriate guidelines, baseline data, and upstream (reference site) data during Stage 1 of the Project to verify earthworks are being effectively managed.

The above recommended mitigations are proposed to be undertaken via the proposed conditions of consent. Earthworks will be required to be undertaken in accordance with best practice standards as detailed in the conditioned CMP (including the Erosion and Sediment Control Plan). Annual aquatic habitat and macroinvertebrate surveys are proposed during Stage 1 as a condition of consent to monitor effects on Silver Stream.

The findings of the surveys will be provided to DCC with assessment against appropriate guidelines and baseline data to determine if the management measures are operating effectively and if further management measures are required.

Overall, based on the proposed construction methodology, design, and implementation of the recommended mitigation, management and monitoring actions, E3 Scientific (2026b) considers the residual level of effect on freshwater values from construction of the SLIP to be low.

6.7.2 Operational Stormwater Discharge Effects

Stormwater runoff from the Site will be actively managed and treated onsite. Runoff from the Site will be captured by the proposed onsite stormwater network and directed through treatment devices before being discharged to the proposed stormwater attenuation pond. Stormwater treatment devices will be confirmed during the detailed design stage but could include gross pollutant traps or universal pollutant traps, oil separators and filter scrubbers as necessary. A fuel-oil separator will be installed near the refuelling area. The treatment devices will capture potential contaminants, such as sediment and associated metals, hydrocarbons and organics, before the stormwater is discharged into the stormwater attenuation pond, avoiding the eventual discharge of these pollutants to Silver Stream. The contaminants will then be periodically removed through a maintenance regime.

The proposed open stormwater swales on the Site will capture external overland flows at the Site boundaries, discharging via two new stormwater outlets and associated spillways into Silver Stream. Uncontrolled flows and/or high temperature water discharging into Silver Stream have the potential to adversely affect the stream. As such, these outlets and spillways will be constructed with erosion protection and flow detectors to minimise the risk of scour and erosion on Silver Stream.

The stormwater attenuation pond has been sized to provide attenuation for the 1% AEP flood event, ensuring potential adverse impacts on the flow regime of Silver Stream are minimised. The pond will discharge into a western swale which, as described above, will be constructed with erosion protections to minimise the risk of scour, and subsequently discharge via an outlet into Silver Stream. The stormwater attenuation pond will have no direct discharge into Silver Stream. During regular rainfall events the stormwater attenuation pond is expected to hold various levels of water which will be discharged over a 12-24 hour time period. Outside rainfall events the pond will remain predominantly dry., at which time it will return to a grassed area.

In flood events, it is proposed that water from the container washbay will be processed as trade waste onsite (via the wastewater network), avoiding the discharge of this water to the

onsite stormwater network. These flows will undergo separation and pre-treatment prior to discharge to the wastewater network. In large storm events, there is the potential for overland flows from the wash area to be directed into the onsite stormwater network; however, the risk of contaminated water entering the pond will be minimised as a result of initial rainfall (referred to as 'first flush', and comprising the first 30 minutes of rainfall during a storm event) being captured, treated by Gross Pollutant Traps and then attenuated (in storage tanks). Consequently, any surcharged flows to the stormwater pond will occur after first flush where residual contaminants from the washbay are captured in attenuation tanks before the rainfall causes overflow.

To ensure stormwater runoff effects on Silver Stream are managed sufficiently by the above design measures, E3 Scientific (2026b) recommends the implementation of the following stormwater monitoring measures:

- Water quality monitoring upstream and downstream of the Site within Silver Stream should occur prior to construction to establish a baseline data set;
- Water quality monitoring upstream and downstream of the Site within Silver Stream should occur quarterly until the stormwater attenuation pond has been fully completed;
- Water quality monitoring upstream and downstream of the Site within Silver Stream should occur within 1 week following a large storm event that has resulted in any overland flow from the washpad/truckwash area;
- An annual report should be prepared and submitted to ORC assessing water quality parameters against appropriate guidelines, baseline samples and upstream (reference site) samples;
- Following a large storm event that has resulted in any overland flow from the washpad / truckwash area, an additional report will be prepared for ORC providing the results of the subsequent water quality monitoring within 2 months of sampling; and
- Continuous upstream and downstream water temperature monitoring should occur in Silver Stream for the first two summers (1 December to 31 March) post stormwater attenuation pond establishment.

The proposed conditions of consent require implementation of the above recommended monitoring measures. Annual aquatic habitat and macroinvertebrate surveys are proposed as a condition of consent to monitor effects on the Silver Stream.

The findings of the surveys will be provided to DCC with assessment against appropriate guidelines and baseline data to determine if the management measures are operating effectively and if further management measures are required.

Overall, based on the proposed stormwater design, management actions and stormwater monitoring, E3 Scientific (2026b) considers the residual level of effect on freshwater values from the operation of the SLIP to be negligible.

6.7.3 Effects on Freshwater Ecology Summary

E3 Scientific (2026b) considers that with the implementation of the recommended mitigation, management and monitoring actions, the impact of the SLIP development and operation on freshwater values will be low, or less than minor.

6.8 LANDSCAPE, NATURAL CHARACTER AND VISUAL AMENITY EFFECTS

The potential effects of the SLIP on the landscape, visual amenity and natural character values of the Ste and surrounding environs have been assessed in detail by Mike Moore Landscape Architect (2026). A copy of this assessment is provided in **Part B** of the application document with the key findings summarised below.

6.8.1 Landscape Effects

Mike Moore Landscape Architect (2026) considers that given the high level of modification and the impact of adjacent industry, the rural character values of the relevant landscape are moderate.

The proposed SLIP will result in a change in character on the Site from rural to industrial with removal of the existing rural development and shelter belts / paddocks to be replaced by paved surfaces, large industrial format buildings and stacked containers. The scale of built elements will be larger than existing Fonterra buildings to the west on Stedman Road but consistent with the general bulk, form and appearance of industrial warehousing. The Te Tangi a te Manu Guidelines[71] confirm that "change itself is not an effect: landscapes change constantly. It is the implications of change for a landscape's values that is the effect".

There will be a change in character for the Site itself but will likely be perceived as an extension of the existing industrial character in the area rather than a completely new element, with its impacts being perceived as less significant within the wider landscape context.

The layout of the development has located the more utilitarian rail siding and container activities to the west of the Site, utilising the proposed warehouse buildings as visual and acoustic screening for the rural environment to the north and east. Proposed planting along

[71] Te Tangi a te Manu, Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

the northern and eastern boundaries and within the bank of Silver Stream located within the Site will contribute to visual screening of the built form of the SLIP and soften the visual effects of the Project in accordance with the Landscape Concept Plan.

Planting within the KiwiRail corridor will comprise a Pittosporum eugenioides / tenuifolium screening tree belt. Views of the Site from the west will be predominantly from lower-sensitivity industrial and aerodrome locations, and this planting will assist to soften the visual effects of the SLIP. The planting in the KiwiRail corridor would be implemented at the same time as the SLIP Stage 1 works.

The acoustic walls and warehouse walls will be finished in colours with a mid-dark tone with an LRV of 30% or lower, to lower the visual prominence of the structures. The roofs of the warehouses will be limited to a lighter tone of no more than 50% LRV, to prevent overheating internally. These finishes to the buildings and structures are proposed as a condition of consent.

Lighting from the facility will slightly exceed District Plan lighting rules and standards relating to light spill at the Site boundaries, being a maximum of 3 lux at the Site boundaries during night-time rather than the 1 lux maximum District Plan standard for operational and security purposes. This will result in a small change to the existing rural lighting character of the Site however given the large separation distances of all nearby dwellings to the Site, the small light exceedance will not be readily noticeable or adverse.

Overall, Mike Moore Landscape Architect considers the physical / landscape character effects of the proposed development will be adverse in nature, and moderate in degree overall.

6.8.2 Visual Effects

Views of the Site are available from several representative private (residences) and public viewpoints (public roads, walking tracks). These include from directly adjacent to the Site along Dukes Road North and Stedman Road, with viewshafts evident from as far away as Milners Road, approximately 940 m from the Site. Figure 6-1 below identifies the location of the closest private residences in relation to the Site.

The visual effects of the SLIP from locations surrounding the Site varies depending on the viewing distance and extent of existing screening.

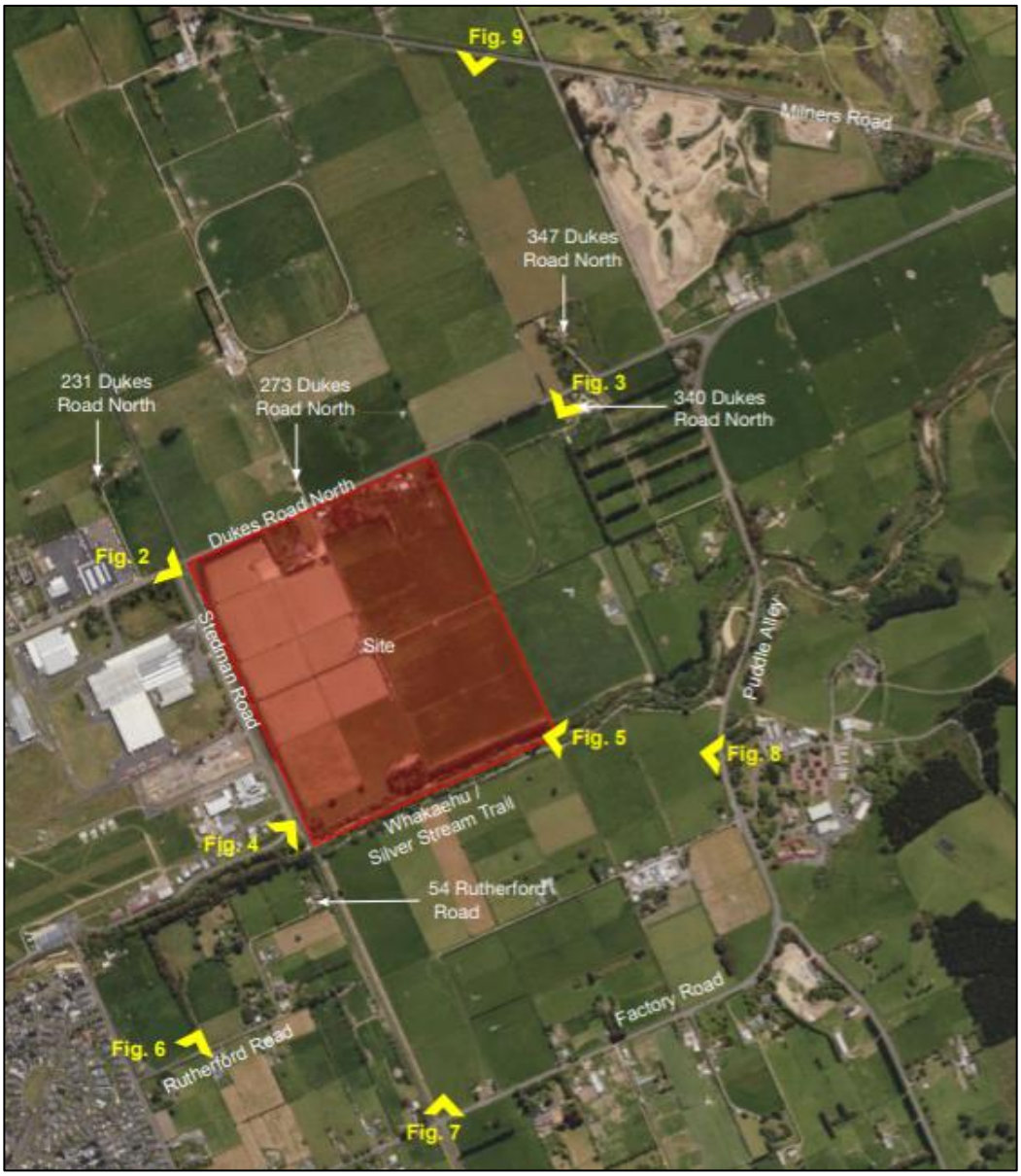


Figure 6-1: Location of Closest Private Residences, Public Roads with Views of the Site and Location of Visual Simulations

6.8.2.1 Public Viewpoints

The change from rural to industrial character will be apparent from closer public viewpoints (~within 50m of the Site on Dukes Road North, Stedman Road and the Silver Stream walking track), and from further afield. The industrial freight activities, operation of the rail siding, and supporting industrial structures will be visible from various viewpoints around the Site. Night lighting will also be visible from near and further away viewpoints.

At a close distance, the adverse effects on public views will be mitigated by the landscape context, with the SLIP likely to be perceived as an extension of the existing industrial character to the west of the Site. Proposed boundary landscaping, once established, will provide significant screening of the development, soften its visual impact and reduce the visibility of night lighting. The muted and consistent colour scheme of buildings will assist to further reduce the visual prominence of the SLIP.

Planting within the KiwiRail corridor will comprise a Pittosporum eugenioides / tenuifolium screening tree belt. Views of the Site from the west will be predominantly from lower-sensitivity industrial and aerodrome locations, and this planting will assist to soften the visual effects of the SLIP. The planting in the KiwiRail corridor would be implemented at the same time as the SLIP Stage 1 works.

For public viewpoints from further afield, the distance from the Site and existing intervening landscaping and structures will ensure views of the SLIP are only intermittent, mitigating the visual effect of the development.

Overall, Mike Moore Landscape Architect (2026) considers the adverse visual effects of the proposed development on public viewpoints will moderate once boundary landscaping establishes. Once operational, the Site will be seen as an extension of the existing industrial land use west of the Site.

Private Viewpoints

The closest residential dwelling located south of the SLIP is at 54 Rutherford Road, approximately 190 m away from the Site. This property has limited visibility of the Site, being well buffered visually by intervening trees and the railway corridor. Loss of vegetation across the wider Site will be mitigated by proposed additional planting along the Silver Stream improving the buffering effect and enhancement of natural character. Overall, Mike Moore Landscape Architect (2026) considers the adverse visual effects of the proposed development on the dwelling to be low.

The dwelling at 231 Dukes Road North is approximately 280 m from the Site and is located adjacent to an industrial property. The Project will introduce port / industrial elements, which are of significant scale and intensity relative to the distance of the property from the Site, however the SLIP will be visually buffered by the intervening vegetation. The visual effects will be further mitigated by the orientation of the dwelling to the north, away from the SLIP Site. Overall, Mike Moore Landscape Architect (2026) considers the adverse visual effects of the proposed development on this dwelling to be moderate.

The dwelling at 273 Dukes Road is approximately 55 m away from the Site and will experience a major change in surrounding character as the SLIP is developed. The SLIP will

be partially screened and softened by the proposed acoustic walls and boundary planting along the Dukes Road North frontage, however the warehouse buildings and industrial nature of the Site, and general operations, will be apparent. Some visual buffering by hedging and sheds between the dwelling and the Site will provide some mitigation of visual effects, and it is assumed the main outlook from the dwelling is north facing away from the SLIP. Regardless, overall, Mike Moore Landscape Architect (2026) considers the adverse visual effects of the SLIP on the dwelling will be high due to the proximity of the dwelling to Site and the significant change in character.

The dwelling at 340 Dukes Road is approximately 560 m east of the Site. Visual effects of the SLIP will be mitigated by the distance to the Site, and the proposed planting / screening of the eastern boundary with a Eucalyptus shelter belt. Overall, Mike Moore Landscape Architect (2026) considers the adverse visual effects of the proposed development on the dwelling to be low-moderate.

The existing dwelling at 347 Dukes Road is approximately 420 m from the proposed SLIP and well buffered visually from the Site by existing planting, with no visibility of the Site. Therefore, Mike Moore Landscape Architect (2026) considers the adverse visual effects of the proposed SLIP on this dwelling will be very low.

6.8.3 Natural Character Effects

The natural form of Whakaehu / Silver Stream is already modified by channelisation. The establishment of two outlet structures and associated spillways within the stream margin will have adverse natural character effects on Silver Stream as a result of the additional human-made elements and changes to water quality resulting from the outflow from the Site via the western spillway. The visibility of other structures associated with the SLIP (including acoustic walls and warehousing) from the stream will also have indirect experiential effects on the natural character of Silver Stream.

In effort to prevent adverse effects on the water quality of Silver Stream stormwater treatment devices (catchpits, pollutant traps and attenuation pond) will be installed throughout the Site, capturing contaminants from stormwater prior to discharge. The proposed rock-lining of the spillways will throttle flow velocities, and minimise the risk of erosion and scouring. Implementing the Landscape Concept Plan will involve targeted removal and control of weedy vegetation and the establishment of locally appropriate vegetation. This will enhance the natural character values through: Staged and targeted removal of weedy or pest vegetation within or along the banks of Silver Stream adjacent to the SLIP;

> Measures to control establishment of weedy/pest vegetation; and

> Establishment of locally appropriate indigenous vegetation to support indigenous regeneration and restore ecological function.

These measures will result in a positive long-term outcome for Silver Stream's natural character relative to the existing baseline condition which has been assessed to be modest in value due to historic modification, channelisation and through agricultural processes degrading water quality.

Mike Moore Landscape Architect (2026) assesses that the confined area of disturbance, minimal change in landforms, low level of ecological effect, and implementation of the above mitigation measures will lead to an enhancement in natural character values of Silver Stream.

6.9 GEOTECHNICAL EFFECTS

Stantec (2026a) has undertaken a review of existing available information relating to sub-surface conditions of the Site and provided a preliminary assessment of geotechnical risks and site-specific considerations.

The proposed excavations to the subgrade design level will partially remove weaker fine-grained soils across most of the Site resulting in improved ground conditions and a reduction in immediate large settlement risk. Settlement risks will remain across the Site in areas potentially containing clay or highly plastic silts however Stantec (2026a) expects these risks will be manageable by detailed design.

A relatively low liquefaction risk is associated with expected site conditions with manageable lateral spreading risk near Silver Stream. Site-specific seismic hazard and liquefaction susceptibility shall be further quantified during detailed.

An area of potential slope instability is anticipated along the northern bank of Silver Stream (which could extend further beyond the bank crest into parts of the site), which requires further detailed investigation as required by the conditions of consent.

Stantec (2026a) recommends targeted geotechnical investigations of the Site are undertaken to confirm the site conditions and determine whether further site and slope stability measures are required for detailed design. As such, a condition of consent is proposed requiring provision of a Geotechnical Site Characterisations Report to DCC to ensure ensuring appropriate integration of geotechnical considerations into the detailed design of the development.

Overall, Stantec (2026a) considers the identified and anticipated geotechnical risks on the Site can be managed through further targeted site investigations and detailed design of the

Project. Stantec (2026a) has not identified any geotechnical hazards or effects that preclude the development of the Site.

6.10 GROUNDWATER EFFECTS

Stantec (2026b) has conducted a groundwater assessment to understand the potential groundwater effects that could impact the civil and structural works required for the establishment of the SLIP. A summary of the findings is provided in the sub-sections below.

6.10.1 Effects on Groundwater Levels and Flow Patterns

The proposed development will not require temporary or permanent groundwater drawdown from within the East Taieri Aquifer, with monitoring indicating a groundwater depth of 7.5-9 m bgl on the Site and hardstand excavations proposed at approximately 3 m bgl. Due to the depth of the groundwater on the Site, groundwater is not anticipated to be encountered by construction even during seasonal variations or during high recharge events.

Development of the Site with buildings, roading and hardstand areas will result in the diversion of approximately 38,000 m^3/year of groundwater recharge from rainfall on the Site. This diverted recharge will result in minor, localised reduction in groundwater levels on the Site however the contribution of the rainfall to the wider water table will not be lost. The recharge either migrates to the groundwater system downstream of the hardstand areas or is diverted into Silver Stream which recharges the groundwater system due to a negative vertical hydraulic gradient in the area causing downward movement of water from the stream into the water table.

Overall, Stantec (2026b) assesses the effects on groundwater levels and flow patterns as negligible as no dewatering during construction is proposed and any change to flow patterns as a result of the diverted recharge will not be significant.

6.10.2 Effects on Groundwater Quality

Remediation of the contaminated soils on the Site will occur prior to commencement of wider site works and no discharge is proposed as part of the works thereby avoiding impacts to groundwater quality.

Conditions of consent requiring provision and implementation of a CMP (including the Erosion and Sediment Control Plan) prior to the commencement of earthworks will ensure earthworks are undertaken in accordance with best practice.

Overall, Stantec (2026b) assesses there will be no impact to groundwater quality across the Site.

6.11 STORMWATER EFFECTS

Stantec (2026d) has undertaken a Stormwater Assessment for the SLIP and has provided a concept design for the site-specific stormwater management system.

Recognising that general construction effects have already been considered in Section 6.4 and 6.7.1 of this Application, the following sub-headings focus on operational considerations.

The establishment of new buildings, impervious areas and access roads will impact natural and existing stormwater drainage patterns on the Site. Associated actual and potential adverse effects if left unmanaged include:

- On-site flooding or ponding;
- Cross-boundary effects, including nuisance effects for surrounding properties or public infrastructure;
- Downstream effects on Silver Stream; and
- Contamination of, or discharges of sediment, hydrocarbons and heavy metals to Silver Stream.

These potential adverse effects will all be appropriately managed as discussed below.

6.11.1 Stormwater Flow Management and Flooding

The Site is located within identified flood hazard areas in the District Plan and is at risk of flooding primarily due to potential overtopping of Mill Stream (located to the north of the Site) during a 10% AEP event (or greater). During flood events, floodwaters currently flow across the Site toward Silver Stream. Development of the Site with heightened ground levels, buildings, roading and hardstand areas has the potential to displace flooding, reduce the flood capacity of the Site and cause adverse flooding effects on upstream and downstream properties.

Stantec (2026d) has therefore designed the stormwater system to manage stormwater runoff from large (1% AEP) storm events to avoid impacting surrounding properties.

External stormwater flows onto the Site will be managed by way of:

- Stormwater swales will be constructed along the north, east and west boundaries of the Site, intercepting external overland flows and diverting the overland flows around the exterior of the Site. This reduces the potential flood hazard risk to onsite activities and avoids the mixing of ‘clean’ external stormwater flows with onsite stormwater;

- Within the swales, the use of check dams (where required) to provide additional attenuation during moderate events and scour protection to minimise erosion;
- Construction of two lined spillways for the western and eastern swales into the Silver Stream discharging the stormwater into Silver Stream. These spillways will be provided with scour protection to reduce discharge velocity and reduce downstream erosion;
- During extreme events (2% AEP and larger), controlled shallow overtopping of the northern swale beneath the northern noise wall onto the Site via flood relief flaps is allowed to occur preventing water from being displaced offsite and avoiding downstream flood effects.

Stormwater runoff within the Site will be managed by way of:

- The primary stormwater pipeline network directing stormwater runoff from building facilities, kerb line and road catchpits, manholes, and outlet structures for a 10% AEP RCP8.5 2080-2100 climate adjusted design rainfall event to drain into the stormwater attenuation pond;
- The internal road network is designed to act as the secondary overland flow path system to convey the 1% AEP Historic and RCP8.5 2080-2100 climate adjusted design rainfall runoff to the stormwater attenuation pond;
- The 25,000 m^3 stormwater attenuation pond provides attenuation storage for holding and throttling peak discharges up to the 1% AEP (RCP8.5 2080 – 2100) rainfall event. The pond will discharge into the western swale via two outlet pipes, avoiding direct discharge into Silver Stream; and
- In events larger than the 1% AEP climate change event, the stormwater attenuation pond will spill over a controlled spillway into the western swale.

For events larger than the 1% AEP, the existing surrounding area is expected to be heavily inundated and therefore any overtopping or flow paths from the Site will largely mimic baseline conditions, avoiding any increase in adverse effect. During overflow events, the risk of erosion is low because Silver Stream will already be flowing at high levels, meaning the discharged water mixes into an active, fast-moving stream rather than striking its banks or bed directly.

The initial approximately 25mm or 5mm/h of any rainfall event will either be directed to the trade wastewater system (if arising from the wash bay) or pass directly through sumps and proprietary stormwater treatment devices and the storage pond, so that the majority of pollutants are captured and stored within the site for periodic removal through a maintenance regime. This approach is consistent with best practice.

It is noted that during prevailing baseflow conditions, which occur approximately 90-95% of the time when it is not raining significantly, the stormwater pond will be dry and there will be no standing water or discharge during this time. Therefore, the system will not have any impact on the flow regime of Silver Stream. During a 10% AEP event, the stormwater pond outflow will be constrained, and the captured volume of storage will be released over a period of 24-48hours, depending on the magnitude/volume stored. This is similar to the time taken for elevated flows in Silver Stream to recede, and therefore, the stormwater discharge will be well diluted.

During more frequent events (smaller peaks than 10%) AEP, there may be an increase in the volume of treated stormwater being discharged, however, this is dependent on the flow of Silver Stream. Stantec note that during winter the catchment is more saturated and baseflows in the Silver Stream are typically higher, while stream temperatures are cooler, whereas the opposite occurs in summer. However, Stantec conclude there will not be a significant change in stream temperature during these events.

Overall, Stantec (2026d) considers that the combined strategy of diverting external flows, managing controlled Site flow paths, and robust internal attenuation minimises flood risk to the Site and downstream areas. The proposed stormwater scheme will ensure the flood capacity of the Site is maintained and development of the Site will not result in adverse flooding effects on surrounding properties.

6.11.2 Stormwater Quality

Stantec (2026d) has considered requirements for onsite stormwater treatment to appropriately manage contaminants (including sediment, hydrocarbons and heavy metals) associated with the proposed freight and industrial activities. The internal road network will be utilised by heavy vehicles and motor vehicles which can also introduce contaminants such as plastics, hydrocarbons, and suspended sediments onto the Site.

Changes in water quality has the potential to impact fish, other fauna, flora, natural character and cultural values. E3 Scientific (2026b) state that the stormwater discharge from the Site (from the eastern and western spillways) could partially change or represent a minor shift away from the existing baseline conditions and attributes within Silver Stream depending on the composition of the stormwater post treatment.

As the internal stormwater management system includes the discharge of stormwater into Silver Stream, adequate treatment is necessary in order to avoid any adverse water quality effects, downstream effects, and / or ecological effects from potential discharge of contaminants.

Effects from the stormwater discharge on freshwater ecology and natural character are specifically discussed respectively in Sections 6.7.2 and 6.8.3 of this report.

Stantec (2026d) has therefore designed the stormwater system to minimise contaminant generation, provide suitable treatment devices and to comply with regional and national guidelines by incorporating the following measures, as to be detailed further in the detailed design plans and drawings:

> Installation of roadside catchpits across the internal road network to capture coarse grits, solid debris and natural leaf litter;

> Installation of gross pollutant traps (or similar treatment devices such as a universal pollutant trap) at each stormwater outlet to capture floating plastics, hydrocarbons, suspended soils and particulate-bound metals;

> Install a fuel-oil separator near the refuelling area on the Site (noting that any storage of use of hazardous substances on the Site will be applied for under a separate application);

> Diversion and discharge of onsite stormwater to the stormwater attenuation pond to allow for sedimentation and potential biofiltration (should the pond be grass lined);

> Implementing effective erosion and sediment controls as necessary during detailed design to prevent bank erosion and sediment discharge into Silver Stream; and

> Adherence to strict spill event procedures to avoid any contaminants from entering the stormwater system and Silver Stream.

To ensure stormwater quality is maintained during the development, conditions of consent are proposed requiring pre-development stormwater quality monitoring to be undertaken with the results provided to DCC in the form of a Stormwater Quality Monitoring Report. This will ensure a robust understanding and record of the baseline water quality levels of Silver Stream are established for future reference (as set out in Section 6.7.1 with respect to construction-related discharges and water quality).

A Spill Response Plan is required to be part of the CMP, to be provided to DCC and ORC for certification, at least 20 working days prior to commencement of works on the Site. The Spill Response Plan will contain suitable management measures to minimise the risk from unexpected contaminant spills on the Site impacting water quality.

Stantec (2026d) considers the implementation of the above design measures, stormwater quality monitoring and Spill Response Plan will effectively manage water quality on the Site, ensuring compliance with environmental standards.

6.12 NON-POTABLE AND POTABLE WATER EFFECTS

Stantec (2026f) have designed the servicing arrangement for the Site to include three new connections to the DCC reticulated water network which will ensure reliability of supply, network resilience and compliance with relevant engineering code and firefighting standards, ensuring the Site is adequately serviced.

These connections will be installed with water meters to provide for monitoring and management of water usage ensuring consumption remains within assessed limits. Backflow devices will also be installed to prevent backflow of water from the Site into the reticulated network, avoiding adverse network water quality effects.

A non-potable water scheme is proposed to harvest and store rainwater from building roofs which will provide non-potable water for firefighting water, general services and construction reducing demand on the public water network.

A condition of consent is proposed requiring preparation and provision of detailed design plans and drawings of the non-potable and potable water management system to DCC for certification prior to commencement of construction works, so to confirm the suitability of the design of the water management system.

DCC has confirmed sufficient capacity is available in the potable water network to service the peak hourly demand for the SLIP during standard operational conditions and during dry weather, where the non-potable water scheme will require topping up from the public water network.

DCC were unable to confirm sufficient supply would be available in the water network for higher water demand anticipated to occur during peak demand periods of construction and fire recovery (at the time of filing this Application), raising the potential for construction related effects relating to management of dust and having water supply available for firefighting. Provision of further design details to DCC will confirm how this additional water demand (that is temporary and only required during construction) can be met in light of the existing public water network constraints.

Stantec (2026f) therefore recommends further investigations into the water demand requirements and potential servicing options for the Site during detailed design. Consent conditions are proposed requiring the consent holder to confirm sufficient water supply is available for the Site prior to commencement of construction activities to ensure that sufficient potable and non-potable supply, storage and pressure is available under all operating scenarios. This will avoid potential adverse effects on network capacity and service level effects while providing for sufficient access to water where greater demand is required during construction.

6.13 WASTEWATER EFFECTS

DCC (Stantec, 2026e) have confirmed there is sufficient capacity in the DCC wastewater network to accommodate wastewater flow demand from the Site subject to the following requirements:

- The DN150 pipe along Odlins Place is upgraded (130 m length) or alternatively the proposed rising main is extended to discharge downstream, into manhole FSM08601;
- Limiting of trade waste flows in heavy rainfall events; and
- Efforts to reduce wet weather flow from the development.

Broadly, the 172 FTE employees and operation of three container washbays will have the following actual or potential wastewater effects:

- Increased wastewater flows discharged to Odlins Place;
- Increased contaminant loading from the container washbays (including a total of three washdown areas) (Industrial Trade Activity); and
- Odour and septicity.

These are discussed in the following sub-sections.

6.13.1 Increased Wastewater Flows

The effects on the public wastewater network could result from excessive peak instantaneous flows, uncontrolled wet weather inflows, inadequate storage capacity, trade waste shock loads or through pump station failure. The characteristics of the anticipated wastewater flow that would be discharged to the DCC system on Odlins Place are summarised below (and assuming the container washbay is in full operation – all three washdown areas operating concurrently):

- Average Dry Weather Flow = 3.35 litres per second
- Average Dry Weather Volume = 63 m^3/day
- Average Wet Weather Flow = 4.1 litres per second
- Average Wet Weather Volume = 350 m^3/day
- Peak Dry Weather Flow = 3.7 litres per second; and
- Peak Wet Weather Flow = 5.1 litres per second.

Wastewater modelling by DCC has indicated sufficient network capacity to convey the additional maximum flows from the SLIP development using the design criteria specified in DCC - Dunedin Code of Subdivision and Development 2010 and NZS 4404 subject to implementing their identified recommendations. The proposed wastewater conditions provide for additional detailed design information to be provided for certification by DCC. Any effects on network capacity, service performance and wastewater quality effects will therefore be managed while ensuring offsite effects on groundwater and surface water from trade waste is avoided.

6.13.2 Industrial Trade Activity Discharge

Container washdown operations will generate conditional industrial trade waste[72] with potential to introduce oil, grease, total suspended solids (“**TSS**”), heavy metals, microplastics, paint flakes, and other gross pollutants to the foul sewer network. A separate application is being made concurrently under the DCC Trade Waste Bylaw 2020, sitting outside of the FTAA process.

The trade waste attributable to the container washbay (inclusive of the three washdown areas) has been calculated as follows:

- Wastewater generation of 4.5 L/s peak flow rate providing a conservative estimate of peak instantaneous demand;
- The average monthly volume of 500 m^3 of flows from the washbay equivalent to a daily average dry weather volume of 25 m^3; and
- A conservative peak daily dry weather volume of 32.5 m^3;

The trade waste attributable to the container washbay (inclusive of the three washdown areas) has been calculated as follows:

- Wastewater generation of 4.5 L/s peak flow rate providing a conservative estimate of peak instantaneous demand;
- The average monthly volume of 500 m^3 of flows from the washbay equivalent to a daily average dry weather volume of 25 m^3; and
- A conservative peak daily dry weather volume of 32.5 m^3;

[72] Means any discharge or proposed discharge into the wastewater system, other than domestic wastewater discharged directly from a premise or self-contained vehicle to the wastewater system. For the avoidance of doubt, trade waste includes tankered waste.

To avoid adverse effects from stormwater reaching the internal wastewater network and increasing flows, the container washbay has been designed at a local highpoint and sufficiently distanced from secondary flowpaths limiting its catchment. Surcharge to the stormwater attenuation pond will occur above the 10% AEP RCP 8.5 2080-2100 design storm, with a fail-safe mechanism minimising effects on the public wastewater network to avoid system failure through surcharge to the stormwater attenuation pond overland. First flushing (during the first 20-30 minutes of the 1% AEP RCP8.5 2080-2100) storm is also anticipated to appropriately capture, treat, and attenuate residual washbay contaminants before reaching the attenuation tanks with any surcharge during an infrequent design storm diverted to the stormwater attenuation pond.

The proposed combination of pre-treatment, additional attenuation storage, diversionary overflow and effective monitoring of pH, grease, biochemical oxygen demand and TSS constitutes a robust integrated management of trade waste protecting council infrastructure and the environment. Stantec (2026e) therefore considers the Project is appropriate in the industrial context to effectively service the SLIP with effects on the wider wastewater network being avoided and / or appropriately mitigated.

6.13.3 Odour

During early operational phases, the effects of odour will be minimised to the extent practicable through the development staging plan allowing the first lateral connections to be made to the downstream end of the gravity network. Additional laterals will be progressively connected and wastewater internal to the Site will be conveyed via a gravity network with manholes allowing for aeration and ventilation of wastewater flows. Additional detailed design information will be provided to DCC via the wastewater detailed design condition, to effectively manage onset of septic conditions, sulphide production and minimise objectionable odour emissions.

Overall, it is considered that as provision of additional detailed design information to DCC will occur prior to construction and connection to the public network, operational effects on the public wastewater network inclusive of odour and water quality will be appropriately avoided and are acceptable.

6.14 TRANSPORT AND ROADING EFFECTS

Stantec has prepared two transport assessments for the Application (the Civil Works and Earthworks Report (Stantec (2026g) which was prepared in February 2026, as well as an ITA (Stantec (2026c) also prepared in February 2026). A summary of the transport effects assessments of these reports is detailed below.

6.14.1 Effects on State Highway Network

The establishment and operation of the SLIP will result in changes to freight movement patterns across the wider state highway network across Dunedin, primarily due to the modal shift from road to rail creating an overall reduction in truck volumes on State Highway 88.

This is anticipated to generate positive effects through a reduction of heavy vehicle exposure on State Highway 88, improving road safety due to decreased interactions with different road users (e.g. cyclists, pedestrians, motor vehicles) and a lower likelihood of heavy vehicle crashes.

While there will be a reduction of heavy vehicle movements through Dunedin City, there will be an increased reliance on State Highway 87 from State Highway 1 which forms primary access routes to the Site, where it is anticipated that there will be 150 additional truck movements per day on average.

Heavy vehicles accessing the Site will utilise Gordon Road (State Highway 87) to travel between State Highway 1 and the Mosgiel industrial area on Dukes Road North, raising potential traffic safety concerns over increasing the volume of heavy vehicles travelling through the urban environment along Gordon Road.

As part of the state highway network and High Productivity Motor Vehicle network, Gordon Road has been designed to provide for freight movement. Stantec have reviewed the last five years of road safety records for Gordon Road and identified three crashes involving heavy vehicles with none of these involving vulnerable road users such as pedestrians or cyclists. The three identified crashes are all unique in nature and do not indicate any specific safety concerns that can be attributed to heavy vehicles in particular. Further, with regard to heavy vehicle traffic associated with the SLIP it is noted:

> SLIP trucks will move straight through Mosgiel on Gordon Road (SH87) without needing to turn at intersections, reducing potential conflict points; and

> DCC has already undertaken minor intersection line marking adjustments to provide more turning space for Heavy Commercial Vehicles in the town centre, although these modifications are not required specifically for SLIP traffic.

Based on their assessment, Stantec (2026c) identified no additional mitigation is required for any road safety effects associated with the SLIP traffic activity on Gordon Road (SH 87).

6.14.2 Mosgiel Roading Network Effects

Stantec (2026c) predicts the SLIP at Stage 3 operations will generate approximately 320 light vehicle movements per day and 230 heavy vehicle movements per day on the Mosgiel

roading network. Stantec (2026c) anticipates this travel demand will not result in noticeable effects on the Mosgiel Road network as traffic volumes will remain within the capacity of the roading network and travel demand for the SLIP will generally be dispersed throughout the day albeit staff travel patterns will be influenced by shift structures with peak arrivals in the early morning and peak departures mid-afternoon.

The anticipated route from State Highway 1 to the SLIP forms part of the strategic road network for Mosgiel with Gordon Road and the majority of Dukes Road North already designed to support freight movements, and no upgrades are considered necessary to support the increase in heavy vehicle movements along these routes.

The remaining section of Dukes Road North between Stedman Road and the Site entrance is currently only formed to a rural road standard and will require upgrading to safely accommodate the increased volume of heavy vehicles.

Stantec (2026g) has prepared a concept design for this upgrade which consists of a new intersection on Dukes Road North at the proposed Site entrance with road widening and the formation of a full right-turn bay to allow inbound and outbound heavy vehicles to manoeuvre safely without impeding through-traffic, minimising conflict points. The intersection will allow right-turning heavy vehicles to turn into the Site while remaining clear of any through traffic, and the proposed road widening will allow safe left-out movements back to the freight network from the Site.

The proposed emergency egress will remain gated during standard operations of the Site and will only be opened to allow for rapid egress from the Site in case of an emergency. The access has been optimised to allow for the exit of heavy vehicles from the Site and will comply with the maximum widths specified under the District Plan.

Both accesses will comply with minimum separation distances and will exceed the minimum sightline requirements under the District Plan.

A condition of consent is proposed requiring provision of detailed design plans and drawings for the proposed new intersection and emergency egress to DCC for certification prior to commencement of any transport-related works on the Site, which will ensure the safe and efficient roading design is achieved.

Overall, Stantec (2026c) considers the increase in vehicle movements on the Mosgiel road network will not result in any noticeable effects and considers access and egress from the Site can operate safely with the identified roading upgrades to Dukes Road North in place.

6.14.3 Effects on Rail Network

KiwiRail has confirmed the Taieri Branch Rail Line has ample capacity for the additional two daily train movements proposed as part of the operation of the SLIP, and there would be no effect on the operation of the railway line as a result of the Project. Due to the proportionately small increase in rail movements on the railway line, alterations to the existing level crossing infrastructure on the Taieri Branch Rail Line are not required.

Stantec (2026c) predicts the increased train movements will have a small and short duration effect on Mosgiel road users on Factory Road and Gladstone Road as trains traverse the level crossings, causing vehicles to wait while the crossing is closed. A train movement involves closing a crossing for about 90 seconds on average although the delays experienced by an individual vehicle will depend on the time at which they approach the crossing. During commuter peak period, a train movement would be expected to affect six vehicles on Factory Road and three on Gladstone Road. The average change in delays for all road users due to the increased train movements will be less than one second and therefore Stantec (2026c) considers the change will not represent a noticeable effect for road users.

6.14.4 Wider Area Transportation Effects

The ITA considers any effects the SLIP could have on the roading network between the Site and Dunedin City.

It is anticipated that with the gradual transfer from road transportation to rail will contribute positively to broader effects, such as a reduction in greenhouse gas emissions – which is a strategic goal of DCC as well as a national goal set by the Central government. A road to rail transition also increases road safety as a result of less vehicles utilising the state highway network.

6.14.5 Internal Road Network

The internal road network will consist of terminal roads (container operations), road exchange areas (interaction of road vehicles and container machinery), truck/access roads for truck and light vehicle movements around the Site and parking.

The terminal roads are dedicated areas for port vehicles and have been designed to meet the Port criteria for such facilities. These areas will not be publicly accessible and will be fit for purpose for the Port facilities.

The two Road Exchange areas will provide for loading and unloading of container trucks by port machinery. These areas have been designed to facilitate these operations, and all loading/unloading requires truck drivers to exit their vehicles and wait in nearby safety booths, avoiding any adverse safety effects.

The truck/access roads, including intersections, roundabouts and waiting areas, around the Site have been designed to accommodate heavy vehicle movements in accordance with Austroads and NZTA guidelines which will ensure any adverse traffic effects are avoided.

Two parking areas have been provided in the concept designed and have been designed in accordance with Austroads and NZTA guidelines which will ensure any adverse traffic effects are avoided.

6.15 NOISE AND VIBRATION EFFECTS

Marshall Day Acoustics (2026) has prepared a Noise Assessment which assesses the operational noise and vibration effects associated with the SLIP.

Matters relating to construction noise vibration is detailed in section 6.4.2 of this Application.

6.15.1 Operational Noise Effects

Operational noise from the SLIP will include container operations, onsite traffic and ancillary sounds (such as truck exchanges, side loaders, straddle carriers, forklifts and high stacking activities), outdoor workshops and container washes. The levels of operational noise will vary depending on the activity being undertaken on the Site. Activities such as the outdoor workshop and container washbay will operate during all hours of operation and activities such as the use of side loaders and straddle carriers will occur 50% of the time.

The Project has been designed with noise mitigation measures in place to reduce noise effects as far as practicable. This includes the following features:

- Site layout – warehouse buildings constructed near boundaries (northern and eastern boundaries) to provide screening between outdoor container stacking activities and sensitive receivers;
- Enclosed loading areas (“tunnels”) within warehouse buildings; and
- Noise walls on Site boundaries where practicable – noting that in some locations, solid walls are not appropriate operationally due to rail access and water flow. These openings face towards the less noise sensitive industrial sites.

These design features have been included in the design to reduce noise emission from the Site, and they represent the best practicable option to ensure that noise associated with the SLIP Project received at nearby sites is reasonable.

While louder instances of noise may be audible during daytime and nighttime to nearby sensitive receivers, Marshall Day Acoustics predicts the operational noise from the SLIP will

comply with the daytime and nighttime noise limits of the District Plan at all times. The character of the noise will be similar to some activity already present in the area, including rail movements to the Fonterra site, farm machinery, and existing container stacking activity adjacent to the airfield.

Marshall Day Acoustics (2026) identifies there is the potential for high noise events from poor container stacking technique to exceed the night-time noise criterion of 75 dB LAmax at nearby receivers if accidental impacts occur. To manage this potential noise generation, Marshall Day Acoustics (2026) recommends the following management measures be implemented:

> Driver training on high stacking;

> Active noise monitoring to capture high noise events and allow follow up with repeat offenders; and

> Minimising high stacking near the Site boundary at night (where practicable).

A condition of consent is proposed requiring the above noise management measures to be established and implemented at the SLIP which will ensure adverse noise effects from poor container stacking technique are managed adequately.

Overall, Marshall Day Acoustics (2026) predicts the SLIP can operate within the noise limits of the District Plan, and therefore any adverse operational noise effects will be reasonable.

6.15.2 Increased Road Noise Effects

Vehicle noise from the public roading network is excluded from noise provisions under the District Plan. Regardless, Marshall Day Acoustics (2026) has undertaken an assessment of the increase in road traffic generated by the SLIP, predicting road traffic noise would likely increase at the two closest receivers by 4 decibels at 273 Dukes Road North and 2 decibels at 231 Dukes Road North.

Marshall Day Acoustics (2026) concludes that the noise from increased road traffic would be 'just perceptible' to the nearest receivers and as such would not have any adverse noise effects on the surrounding residential dwellings.

6.15.3 Rail Noise Effects

Rail noise from the rail corridor and rail sidings is excluded from noise provisions under the District Plan. However, an increase in rail movements can have a noise effect and therefore Marshall Day Acoustics (2026) has undertaken a noise assessment for both the rail movements on the rail siding and in the rail corridor (offsite).

Marshall Day Acoustics (2026) assesses that rail noise from the Site will be similar to existing rail noise in the area. There will be brief periods of high noise from rail movements associated with the Site that will impact sensitive receivers in proximity to the rail line however these receivers will already experience a similar level of noise from the existing 4 to 8 rail movements occurring along the railway line outside the Site. As the Project will only add an additional two rail movements during daytime hours to the railway line, Marshall Day Acoustics (2026) considers any additional noise impact on receivers near the rail corridor will be negligible.

Given the small increase in rail movements, the timing of those movements, and the likelihood that nearby dwellings already incorporate some degree of noise insulation, Marshall Day Acoustics (2026) considers that any noise effects from trains accessing the Site will be reasonable and will not result in a noticeable difference in the noise level or noise character for receivers near the rail corridor. They therefore conclude adverse noise effects from the rail operation will be reasonable.

6.15.4 Operational Vibration Effects

Marshall Day Acoustics (2026) has considered vibration effects from the onsite operations of the SLIP and concludes that any vibration effects would be below the perceptible level for normal residential environments (which is 0.3mm/s),[73] therefore concluding that any adverse vibration effects during operation of the SLIP will be negligible on any residents in the vicinity of the Site.

6.16 LIGHTING EFFECTS

An assessment of effects on the surrounding environment from artificial lighting associated with the construction and operation of the SLIP has been prepared by Pedersen Read (2026) through review of a concept lighting plan for the Site.

The Site lighting will be designed to minimise lighting effects where possible however non-compliances with the District Plan lighting standards are proposed relating to spill light and illuminated signage as a result of operational requirements of an inland port. The effects of these non-compliances are proposed to be managed through implementation of proposed consent conditions as described further below.

The key lighting effects pertain to spill light, glare, sky glow and illuminated signage with the effects of construction lighting and lighting effects on terrestrial ecology and aviation discussed in Section 6.4.3, Section 6.6 and Section 6.17 of this report respectively.

[73] Marshall Day predicts that this is the level considered just perceptible in normal residential environments.

6.16.1 Permanent Lighting

Permanent lighting from the SLIP has the potential to result in glare and light spill effects to adjacent properties, the railway line and the road causing annoyance, distraction, discomfort or disability. It also has the potential to result in obtrusive projection of lighting above the horizontal plane, increasing man-made sky glow.

To maintain the operational security and safety of the SLIP, a minimum light level of 3 lux will be maintained along the northern, eastern and western Site boundaries, and along the nominal southern boundary of the southern acoustic wall. This illuminance will exceed the District Plan nighttime standard of 1 lux during the hours of 10 pm – 7 am however 3 lux is only equivalent to approximately three times the brightness of full moonlight and is dimmer than a standard suburban street lamp (approximately 5 to 30 lux).

To mitigate the effects of the permanent lighting Pedersen Read (2026) recommends the following mitigation measures:

- Lighting should be installed with minimum light levels required to achieve a safe operational environment for the SLIP. Colour temperature lighting of ≤4000K can be utilised within the container operations environment on the Site to ensure safe container operations can occur. For all other areas of the Site, warm colour temperatures (≤3000K) can be utilised to reduce the apparency and discomfort caused by the lighting;
- All external lighting should be installed with zero upward component, without tilt, and with appropriate shielding to ensure light spill is controlled and minimising glare to external parties to the Site; and
- All interior lighting will be designed having regard to potential visibility from outside of the Site incorporating controlled optical distributions, use of motion detection lighting with slow lighting transitions, use of tinted glazing and light shielding to minimise visibility.

To ensure adverse effects from lighting are managed, a condition of consent is proposed requiring provision of detailed lighting design plans and drawings for the SLIP to DCC for certification prior to the commencement of any operational activities at the Site. The documentation will include details of the design of the lighting and management measures to manage the effects of the lighting.

Conditions of consent are also proposed limiting the maximum colour temperature of lighting on the Site, restricting light spill along the southern acoustic wall to no more than 3 lux, controlling the design of exterior lighting, restricting buildings on the Site from having

transparent or translucent facades, and requiring lighting of the railway siding to comply with KiwiRail lighting standards and guidance.

Overall, Pedersen Read (2026) considers with the implementation of the recommended lighting mitigation measures, residual lighting effects will be less than minor. Given the low level of lighting exceedance and separation distance of nearby receivers to the Site boundaries, Pedersen Read (2026) considers any effects on rural character and amenity from the lighting infringement will be less than minor.

6.16.2 Illuminated Signage

Illuminated signage has the potential to result in glare and distraction to adjacent properties, the railway line and the road causing annoyance, distraction, discomfort or disability.

Multiple illuminated signs will be used throughout the Site for wayfinding, operational and safety purposes and as such will not comply with the District Plan provisions for illuminated signage in rural zones. It is anticipated illuminated signage will be visible from adjacent sites and the road.

To mitigate the effects of the illuminated signage Pedersen Read (2026) recommends the following mitigation measures:

- All illuminated signage to be lit from above utilising flat glass fittings with zero upward component and no tilt. Internally illuminated or digital signage not to be utilised;
- All illuminated signage should comply with District Plan Rule 6.7.3.3 relating to illuminated signage visible from roads;
- No transitioning signage or coloured lighting signage (other than illuminated safety, warning and traffic signals) shall be used. Lighting should generally be low intensity, shielded, non-flashing, and directed to minimise visibility beyond the immediate operational area; and
- Illuminated signage should utilise warm colour temperatures (generally ≤3000K), controlled optical distribution, and minimal upward light output, with lighting levels limited to the minimum required for operational purposes.

To ensure adverse effects from lighting are managed, conditions of consent are proposed requiring all illuminated signage on the Site to be lit from above using flat glass fittings with zero upward component and no tilt, to have colour temperature of ≤3000K, to utilise slow transitions and not utilise flashing or rapid transitions, and must be low intensity, shielded and directed to minimise visibility beyond the operational area.

Overall, Pedersen Read (2026) considers with the implementation of the recommended lighting mitigation measures, residual lighting effects from illuminated signage will be less than minor.

6.17 EFFECTS ON RISK TO AVIATION SAFETY

Due to the proximity of the Site to Taieri Aerodrome, Astral Limited (2026) completed an Aviation Impact Report for the Project.

6.17.1 Potential Effects on Risk to Aviation Safety

The potential effects on risks to aviation safety of the Project are the potential aviation risks to the operation and safety of Taieri Aerodrome which Astral Limited has identified as being:

- Risk of injuries to pilots and passengers as well as persons on the ground beneath take-off flight paths over the Site in the event of an engine failure on take-off on runway 05;
- Bird risk from the stormwater attenuation pond and birds roosting on roofs;
- Potential intrusion into the District Plan's 1:20 OLS located over the Site including by permanent structures and temporary construction cranes;
- Glare from Site lighting; and
- Impact on helicopter Instrument Flight Rule (IFR) operations.

6.17.2 Management of Engine Failure Risk

While the SLIP cannot control or directly impact flights operating from Taieri Aerodrome, the location of the SLIP beneath the flight fan of Runway 05-23 means an aircraft experiencing engine failure could potentially come down on the Site, noting however that Astral Limited considers it is 'unlikely' that such an engine failure will occur.

There are no statutory requirements under the District Plan or Regional Plan to provide emergency landing areas on sites located beneath flight fans, nor are there any requirements under relevant aviation legislation. However, the site layout provides an Open Space Area along the southern Site boundary, in which emergency landings could occur should they ever be required.

This Open Space Area would range from approximately 43.75 m to 75 m wide, and would comprise internal road, parking and loading areas for the SLIP. The area would be kept free of buildings. The Open Space Area is purposefully located within the Runway 05-25 flight fan / heading which will benefit any distressed aircraft by minimising any turns required to align with the Open Space Area. The provision of the Open Space Area provides mitigation to risk

of injury (as far as reasonably practicable) to onsite persons and aircraft operators / passengers in the event of an engine failure over the Site.

6.17.3 Management of Bird Strike Risk

While the SLIP will involve the clearance of a significant amount of bird attracting vegetation across the Site, new vegetation will be planted along the Site boundaries and the SLIP also involves the construction of a stormwater attenuation pond and roof / canopy areas; all features that can be attractive to bird life which could potentially increase the risk of bird strike.

Overall, the net level of vegetation across the Site will be decreased by the clearance of the Site and subsequent new planting of the Site boundaries. As such, it is considered the proposed landscaping will, relatively, attract less birdlife than the existing vegetation thereby reducing the risk of bird strike.

The stormwater attenuation pond will generally be dry and has been designed to completely drain within 48 hours following a storm event. This will minimise the attractance of the basin to waterfowl.

A condition of consent is proposed to prepare, and subsequently implement, a Wildlife Hazard Management Plan for the Site that will be part of the CMP and will include a bird monitoring and management programme. This programme will include:

- Construction management measures to minimise the attractance of construction activities, such as soil stockpiles, to bird life;
- Monitoring requirements of bird activity on the Site (including at higher risk locations such as vegetation, the stormwater attenuation pond and warehouse roofs);
- Action requirements, including implementation of additional deterrent measures, should increased bird activity beyond normal levels occur on the Site; and
- Reporting requirements to DCC.

The Wildlife Hazard Management Plan will be provided to the operator of the Taieri Aerodrome for their review, prior to being submitted to DCC for certification. This will ensure the risk of bird strike from birds being attracted to the Site will be monitored and managed on an ongoing basis.

6.17.4 Construction Safety Procedures and Avoidance of the Obstacle Limitation Surfaces

Permanent Structures

The height of all proposed buildings and structures will comply with the 1:20 OLS over the Site under the District Plan. This avoids intrusion into the operational airspace of Taieri Aerodrome, avoiding the potential to create collision risk with aircraft taking off and landing at the airfield. A condition of consent is proposed (refer to **Part C**) requiring all permanent structures and buildings within the Taieri Aerodrome Flight Fan Mapped Area e to comply with the 1:20 OLS.

Outside of the District Plan, Civil Aviation Rules also apply to the Site under the Civil Aviation Act 2023. While the permanent structures and buildings on the Site will comply with the District Plan 1:20 OLS, they may intrude into the shallower 1:40 OLS, which acts as a separate CAA notification trigger under Civil Aviation Rule 77, from the east end of Runway 05-23. The applicant will, in compliance with Rule 77, notify the CAA of the development at least 90 days prior to the commencement of construction.

The CAA will subsequently undertake an aeronautical study of the Project as set out by the Civil Aviation Rules and issue a determination on whether the project constitutes an aviation hazard.

Following the requirements of the Civil Aviation Rules will therefore ensure any aviation hazards are identified and addressed appropriately prior to construction of the Project, ensuring any effects on aviation safety are appropriately managed.

Temporary Construction Equipment

Detailed construction methodology for the Project will be prepared at detailed design stage however it is anticipated temporary construction cranes will intrude into the 1:20 OLS.

To manage the potential for conflict with the operations of Taieri Aerodrome from the intrusion into the 1:20 OLS, the provision of detailed content and performance indicators for activities occurring within the Taieri Aerodrome Flight Fan Mapped Area within the CMP are proposed as a condition of consent. The information will outline the safety measures to be followed during construction works beneath the Taieri Aerodrome Flight Fan Mapped Area including when works intrude into the 1:20 OLS. The section of the CMP will be provided to the operator of Taieri Aerodrome, for review, and certified by DCC to ensure risks to aviation safety are managed.

The Applicant will also continue to meet their obligations under the Civil Aviation Rules. This approach will ensure any risks to aviation safety associated with construction works on the Site are appropriately managed.

6.17.5 Management of Lighting Effects

While the Taieri Aerodrome only supports night-time operations of the medical helicopter service operated by Helicopters Otago, the potential for glare from lighting on the Site poses potential safety risks to day flights as well as the night-time helicopter operations. In order to avoid glare unacceptably impacting pilots operating from the airfield, the following management and mitigation measures are proposed:

- Construction works will generally be undertaken during standard daytime working hours and night-time construction is not proposed, avoiding the need for regular construction lighting;
- In limited circumstances, such as early morning starts required for specific activities (e.g. large concrete pours), temporary construction lighting may be used to maintain safe working conditions. The CMP will include management measures for use of temporary construction lighting;
- Prior to submission of the CMP and detailed lighting drawings, respectively, to DCC for certification, the documents will be provided to the operator of Taieri Aerodrome, for their review and feedback;
- Notification of affected neighbours regarding construction activities, if there is a specific need to undertake works at night;
- All exterior lighting to be flat glass with zero upward component and installed without tilt;
- No feature uplighting to be undertaken; and
- Utilise shielding to ensure spill light is controlled.

These measures have been incorporated into the proposed consent conditions for the CMP and lighting design, which will ensure the risk of glare from the SLIP is appropriately managed, avoiding additional risk to aviation safety.

6.17.6 Ongoing Monitoring and Management Measures

As identified above, it is proposed via condition of consent (refer to **Part C**) to require provision of the CMP, detailed lighting drawings and the Wildlife Hazard Management to the operator of Taieri Aerodrome, for their review as the operator of Taieri Aerodrome, prior to their submission to DCC for certification.

This will ensure the operator of Taieri Aerodrome has the opportunity to review proposed construction, lighting and wildlife design and management measures, and provide feedback to the Applicant prior to the documents being submitted to DCC for certification.

This process (facilitated by the proposed conditions) seeks to ensure that a robust consultation process is undertaken with the Taieri Aerodrome to ensure that any potential risks to aviation safety can be identified, appropriately validated and, where necessary, measures can be put in place through detailed design of the Project to address the matters being raised.

6.17.7 Effects on Risk to Aviation Safety Summary

It is considered the application of the mitigation and management measures described above and as incorporated into the proposed consent conditions will appropriately mitigate residual effects of the Project on risks to aviation safety.

6.18 EFFECTS ON ARCHAEOLOGY

The entirety of Holmhead Farm, which is identified as an archaeological site HNZPT due to the presence of pre-1900's features, both above ground and below ground up to the depth of proposed excavations, will be removed from the Site.

SLPL has already sought, and acquired, Archaeological Authority 2026-362 HNZPT under the HNZPT Act 2014 for the removal of all above ground visible buildings and archaeology on the Site up to the depth of the proposed excavations to form the SLIP. This approval was granted on 30 January 2026 and expires on 30 January 2036.

The earthworks around the archaeological site will be undertaken in accordance with the Conditions of Authority including all notification, briefing and recording requirements.

SLPL will implement an accidental discovery protocol across the Site. Should accidental discovery of archaeological remains occur during the proposed works, work will cease in the immediate vicinity, DCC and HNZPT will be informed, and if the remains appear to be of Māori origin, SLPL will notify appropriate iwi representatives of the discovery and ensure site access to enable appropriate cultural procedures and tikaka to be undertaken (as long as all statutory requirements are met under the HNZPT Act and the Protected Objects Act 1975).

With the implementation of the measures set out above, it is considered any archaeological effects will be adequately managed.

7. MANAGEMENT AND MONITORING OF ENVIRONMENTAL EFFECTS

7.1 APPROACH TAKEN

Section 6 of this substantive application provides an assessment of the actual and potential effects of the SLIP, which is based on:

- Engagement with iwi;
- The various technical assessments commissioned by SLPL; and
- Engagement with ORC, DCC, and other parties (such as the Taieri Aerodrome) as identified in Section 5 regarding technical feedback on the technical assessments.

Many of the technical assessments have recommended the implementation of measures to avoid, remedy, or mitigate potential adverse effects on the environment. These recommendations have shaped the development of a suite of proposed conditions which is provided in **Part C** of these application documents.

SLPL will also progress the development (including the detailed design) and operation of the SLIP in accordance with a selection of management plans (some provided in **Part D** of these application documents) to ensure that measures to properly manage effects and minimise potential adverse effects are employed. The conditions have been drafted to specify the purpose or objective of each plan, the minimum contents of the plan, who is to prepare it, and who else should be consulted or involved in that process. If there is conflict between the management plan and the condition, then the conditions must prevail. The management plans are then submitted to the relevant council for their assessment and certification (or recertification in respect of a variation) against the requirements of the relevant condition.

SLPL recognises that it will not be possible to completely avoid all potential environmental effects associated with the SLIP, nor does the FTAA (or RMA) require such an outcome. As such, there will be residual effects requiring further monitoring and / or management, including but not limited to potential effects associated with loss of avifauna habitat, impacts on the water quality and freshwater ecology of Silver Stream, the loss of areas of lizard habitat, and natural character values.

Overall, SLPL and its technical advisors consider that the SLIP can be undertaken in a manner that will appropriately address any unavoidable adverse environmental effects. Where residual effects remain, they will be managed while achieving the purpose of the Act – to deliver a project with significant regional and national benefits.

7.2 MEASURES PROPOSED

The key measures proposed by SLPL to manage identified effects are set out in Table 7-1.

Table 7-1: Summary of Key Management and Monitoring Measures for the SLIP

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Cultural Effects		
Potential effects on matters of importance to mana whenua and their relationship with ancestral lands and water.	Establishment of a Mana Whenua Consultation Group. Involvement of the Mana Whenua Consultation Group in the implementation of a selection of environmental management plans and mitigation measures. Application of an accidental discovery protocol and other protocols and practices as described in this Table under the Archaeology heading.	Ongoing meetings of the Mana Whenua Consultation Group to occur at the time of key construction milestones for the SLIP.
Ground Contamination		
Potential impact on health of humans and the environment from contaminated soils	Implement a CSMP (draft provided in **Part D**). Implement a RAP (draft provided in **Part D**).	None.
Potential impact to health of humans and the environment from asbestos	Undertaking of asbestos survey(s) prior to the demolition of existing buildings. If asbestos is detected, implement measures in accordance with the CSMP (draft provided in **Part D**).	None.
Terrestrial Ecology		
Avifauna habitat loss	Undertaking of avifauna surveys prior to removal of vegetation greater than one meter in height during the avifauna breeding season (August to March) to identify if any nests are present. If nesting birds are found, felling is not to commence until fledglings have left the nest. Undertaking of avifauna surveys within five days prior to of any earthworks undertaken during the South Island Oystercatcher breeding season (August to February) to identify if any nests are present. If nesting birds are found, earthworks are not to commence until fledglings have	None.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	left the nest, or earthworks are to occur outside a buffer around the nest approved by a suitably qualified and experienced professional. Vegetation along the bank of Silver Stream is to be retained, outside of vegetation removal required to facilitate the development, and with the exception of pest or weedy species which will also be removed.	
Tussock Skink habitat loss	A Wildlife Act Authority will be applied for under the Wildlife Act 1953 to cover the salvage and relocation of tussock skink from the Site.	To be covered by the Wildlife Act Authority.
Risk of bird strike	Prepare and implement a Wildlife Hazard Management Plan for the Site, which is to include: > The implementation of a bird monitoring and mitigation programme which seeks to ensure bird strike rates associated with the Taieri Aerodrome do not increase with the construction and operation of the SLIP; > The implementation of bird deterrent measures which are to be implemented on buildings and structures to decrease roosting and perching opportunities within the Site; and > The measures for identifying further actions required in the instance that deterrent measures are not operating effectively.	Implementation of a bird monitoring and mitigation programme.
Noise and vibration disturbance to fauna	Implement a CMP (draft provided in **Part D**). Compliance with NZS 6803"1999 '*Acoustics – Construction Noise*' for daytime construction noise. Compliance with the following for operational noise: > The following noise limits are not exceeded at the notional boundary of any existing noise sensitive receiver (dwelling):	Noise monitoring at weekly intervals during construction.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	> *55 dB L_{Aeq} daytime (7am – 10pm); and* > *45 dB L_{Aeq} night-time (10pm – 7am).* > The following noise limits are not exceeded at any industrial boundary: > *65 dB L_{Aeq} during day and night periods.* Compliance with DIN 4150-3:2016 *'Vibrations in buildings – Part 3: Effects of vibration on structures* for vibration activities.	
Light disturbance to fauna	Construction lighting along the western, northern, and eastern site boundaries, and along the southern acoustic wall (parallel to Silver Stream) to be designed, located, shielded and controlled so that light spill does not exceed 3 lux (measured at 1.5m above ground level). The colour temperature of lighting will be ≤3000K in all areas of the Site other than the container handling and yard areas where it may be ≤4000K.	Undertaking of suitable monitoring along the bank of Silver Stream prior to construction works commencing, and once the SLIP is operational to determine if lighting is impacting on any Threatened and At Risk species utilising the stream bank. If an impact is confirmed, restoration planting is to occur along a length of stream at a suitable site within the Ecological District.
Introduction / spread of new and / or pest species via containers and trucks	Implement biosecurity measures in accordance with national biosecurity standards.	None.
Increased presence of predator species onsite	Implement site wide predator control and waste management measures.	None.
Freshwater Ecology		
Sedimentation runoff into Silver Stream	Undertaking of earthworks and instream works in accordance with best practice measures and Erosion and Sediment Control Plans. Undertaking of instream works during low flow conditions.	None.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	Establishment of plantings above the winter base flow level of the western swale to reduce sediment erosion.	
Changes to the water quality of Silver Stream	Undertaking water quality sampling in Silver Stream prior to the commencement of construction, during construction, and following construction / once the SLIP is operation. If construction or operational sampling identifies degradation of the water quality of Silver Stream, appropriate management and / or mitigation measures are to be identified by a suitably qualified and experienced professional and implemented by SLPL.	Implementation of appropriate management and / or mitigation measures if monitoring determines degradation to the water quality of Silver Stream as a result of the SLIP.
Risk of waste and / or contaminants entering Silver Stream	Implement a Spill Response Plan. Implement waste management measures.	None.
Landscape, Natural Character and Visual Amenity		
Visual impacts associated with built form and hard surfacing	External colours of onsite structures to be a consistent palette. Acoustic walls and Site buildings to be finished in colours with a mid-tone and light reflectance value of 30% or less. Warehouse roofs to have lighter tones with light reflectance values of approximately 50%. Establishment of landscaping along external Site boundaries.	Maintenance of landscaping following initial plantings. Any non-thriving or dead plants to be replaced.
Visual impacts associated with removal of existing vegetation	Retention of existing planting where possible.	None.
Impacts to natural character values of Silver Stream	Implement natural character enhancement measures along that part of the northern bank of Silver Stream located within the Site, to remove and	Annual checks for potential re-establishment of weedy and pest species, and implementation of

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	control pest and weedy species and establish / enhance presence of locally appropriate indigenous vegetation.	control measures to assist with controlling / limiting re-establishment.
Geotech		
Effects associated with onsite ground and slope stability, bearing capacity / soil strength, settlement, and seismicity matters	Undertake geotechnical investigations and surveys to confirm site characterisations prior to detailed design.	None.
Effects associated with slope stability along the bank of Silver Stream	Undertake geotechnical investigations and surveys to confirm site characterisations prior to detailed design.	Implementation of appropriate slope stabilisation measures if geotechnical investigations and surveys demonstrate that there is a need for them to improve the resistance of the slope to potential failure.
Groundwater		
Potential impacts of construction dewatering	Undertake groundwater level monitoring prior to detailed design.	If groundwater level monitoring determines that dewatering is required, dewatering activities are not to occur until such time that any necessary consents and / or approvals have been obtained.
Stormwater		
Impacts on Silver Stream water quality resulting from stormwater runoff	Undertaking water quality sampling in Silver Stream prior to the commencement of construction, during construction, and following construction / once the SLIP is operation. If construction or operational sampling identifies degradation of the water quality of Silver Stream, appropriate management and / or mitigation measures are to be identified by a suitably qualified and experienced professional and implemented by SLPL.	Implementation of appropriate management and / or mitigation measures if monitoring determines degradation to the water quality of Silver Stream as a result of the SLIP.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Potential spill events and the associated discharge of contaminants into the stormwater management system and Silver Stream	Implement a Spill Response Plan.	None.
Erosion and sedimentation effects	Undertaking of earthworks and instream works in accordance with best practice measures and Erosion and Sediment Control Plans. Undertaking of instream works during low flow conditions. Revegetation of all areas of earthworks (excluding any area covered by building or hardstand areas) to achieve 80% ground cover within 12 months of the completion of earthworks.	Inspection of the stormwater attenuation pond, eastern and western swales, and the spillway structures as necessary for any maintenance or repairs necessary to ensure features are operating within their design criteria.
Wastewater		
Potential overflow of wastewater from the container washbay in large storm events to overland flow and the stormwater attenuation pond, with consequential discharge to Silver Stream	Routine inspection of the wastewater and stormwater management systems for any maintenance or repairs necessary to ensure features are operating within their design criteria and therefore limiting any wastewater discharges to Silver Stream.	Inspection of the wastewater and stormwater management systems as necessary for any maintenance or repairs necessary to ensure features are operating within their design criteria.
Transport		
Impacts to public safety and delays to road users	Implement a CMP (draft provided in **Part D**).	None.
Impacts to road safety	Implement a CMP (draft provided in **Part D**). Undertake all works within the road reserve in accordance with a Corridor Access Request and appropriate traffic management measures.	None.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Operational noise of rail movements to and from the Site	All train movements from the SLIP will operate between the hours of 7am and 10pm, unless otherwise approved in writing by DCC.	None.
Provision of active transport options	Work collaboratively with the DCC to determine if there is a need for the provision of a footpath connection to / from the SLIP. If the need is confirmed, SLPL is to provide a footpath to the SLIP along Dukes Road North.	None.
Noise and Vibration		
Construction noise creating nuisance to receivers	Implement a CMP (draft provided in **Part D**). Compliance with NZS 6803"1999 '*Acoustics – Construction Noise*'. Establishment of a complaints register.	None.
Construction vibration creating nuisance to receivers	Implement a CMP (refer to **Part D**). Compliance with DIN 4150-3:2016 'Vibrations in buildings – Part 3: Effects of vibration on structures'. Establishment of a complaints register.	None.
Operation noise creating nuisance to receivers	Compliance with the following noise limits: > The following noise limits are not to be exceeded at the notional boundary of any existing noise sensitive receiver (dwelling): > > *55 dB L_{Aeq} daytime (7am – 10pm); and* > > *45 dB L_{Aeq} night-time (10pm – 7am).* > The following noise limits are not to be exceeded at any industrial boundary: > > *65 dB L_{Aeq} during day and night periods.*	Noise monitoring at six-monthly intervals during operation.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	Establishment of a complaints register.	
Lighting		
Construction lighting nuisance to receivers	Implement a CMP (refer to **Part D**). Notification to affected neighbours regarding construction activities, if there is a specific need to undertake works at night / outside daylight hours. Establishment of a complaints register.	None.
Operational lighting nuisance to receivers	The colour temperature of lighting utilised at the SLIP is to comprise: • <4000K within container handling and yard areas; and • <3000K in roadways and circulation routes, and all other areas of the Site. Lighting along the western, northern, eastern, and southern acoustic wall (parallel to Silver Stream) will be designed, located, shielded and controlled such that spill light does not exceed 3 lux (measured at 1.5 m above ground level). All exterior lighting (including streetlights) is to be flat glass with zero upward component and installed without tilt. Lighting of the rail siding is to be in accordance with KiwiRail lighting standards and guidance (including but not limited to E-ST-EL-0131 Rail Yard Lighting). Buildings within the Site are not to have transparent or translucent facades.	None

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
	For onsite illuminated signage: • It will be lit from above using flat glass fittings with zero upward component, and no tilt; • The colour temperature will be ≤3000K; • Operational and wayfinding signage will not utilise flashing or rapid transitions; and • Any changes in luminance of operational and wayfinding signage will be slow, unless required for safety operational purposes when lighting will be low intensity, shielded, and directed to minimise visibility beyond the operational area. Establishment of a complaints register.	
Operational lighting nuisance to users of the Taieri Aerodrome	Detailed design of lighting to consider the Taieri Aerodrome Flight Fan height limitations such that all lighting infrastructure is to be installed within the allowable height limits. Establish a Southern Link Inland Port Aviation Safety Consultation Committee with the operator of the Taieri Aerodrome, which is to meet and review any aviation safety issues associated with the construction and operation of the SLIP. Establishment of a complaints register.	Ongoing meetings of the Southern Link Inland Port Aviation Safety Consultation Committee.
Aviation		
Construction related infringements of the 1:20 upslope OLS	Implement a CMP (draft provided in **Part D**), specifically those matters relating to activities beneath / within the Taieri Aerodrome Flight Fan Mapped Area.	None.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Effects relating to forced landings of Taieri Aerodrome aircraft	An open space area is provided at the SLIP to provide a space for aircraft in the event of engine failure and the need for a forced landing.	If an agreement is made between the operator of the Taieri Aerodrome and the Consent Holder for the open space area to be smaller, the DCC is to be notified and provided evidence of such an agreement.
General aviation safety	Establish a Southern Link Inland Port Aviation Safety Consultation Committee with the operator of the Taieri Aerodrome, which is to meet and review any aviation safety issues associated with the construction and operation of the SLIP. Provision of copies of the following documents to the operator of the Taieri Aerodrome prior to their submitting to Council for certification, so to enable the operator of the Taieri Aerodrome to review the content with regard to aviation safety and provide feedback on the proposed effects management procedures. SLPL is to then consider the feedback provided and make any necessary updates to the documents before submitting to the Council: (a) Aspects of the CMP relating to detailed content and performance indicators of construction activities and safety procedures occurring within the Taieri Aerodrome Flight Fan Mapped Area; (b) Lighting detailed design plans and drawings; and (c) Wildlife Hazard Management Plan.	Ongoing meetings of the Southern Link Inland Port Aviation Safety Consultation Committee. Implementation of a bird monitoring and mitigation programme.
Archaeology		
Accidental discovery of historical and archaeological items, including unknown archaeological items.	Adherence to the requirements of Archaeological Authority 2026-362. Implementation of an accidental discovery protocol under the HNZPT Act 2014 with regards to archaeology.	Monitoring will be undertaken as required by the Archaeological Authority.

Actual or Potential Effect	Recommended Mitigation / Management	Recommended Monitoring / Future Action
Accidental discovery of koiwi tangata (human remains).	In the event of koiwi tangata (human remains) being uncovered, work should cease immediately in the vicinity of the remains and mana whenua, HNZPT, the NZ Police and DCC should be contacted so that appropriate arrangements can be made.	None.

8. FAST-TRACK APPROVALS ACT 2024 REQUIREMENTS

8.1 OVERVIEW

The Act introduces a system that puts in place a single assessment framework for addressing various consenting and permitting obligations relevant to a given project. This Application only seeks approvals required under the RMA. The approval process set out in the Act applies instead of the processes provided for under other legislation, such as the RMA.

In assessing the applications for resource consent approvals, Panels are to give the greatest weight to the single purpose of the Act, which is "*to facilitate the delivery of infrastructure and development projects with significant regional or national benefits*".[74] The statutory purpose must be given the greatest weight in the Panel's decision on the application under section 81, including when deciding what conditions should be imposed on approvals, or, in an exceptional case that meets the requirements in section 85(3)(b), in deciding not to grant an approval.

As discussed earlier in this report, the Minister for Infrastructure referred the Project into the Fast-track approvals process on 14 August 2025. The Minister's referral notice lists a number of reasons as to why the Project is considered to be an infrastructure or development project that would have significant regional or national benefits. These reasons are expanded on in this Application.

8.2 PRELIMINARY STEPS FOR REFERRED PROJECTS

As this Project is for a referred project, rather than listed, section 29 of the Act requiring consultation with certain persons and groups is not relevant. Nevertheless:

> SLPL has consulted with the persons and groups referred to in section 11[75] of the Act including ORC, DCC,[76] Te Rūnanga o Ngāi Tahu, Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou,[77] and MfE[78] as set out in Section 5 of this report; and

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[74] Section 3, and Clause 17(1) of Schedule 5 of the Act.

[75] This section is titled consultation requirements for *referral applications*, however Section 29 of the Act (which deals with listed projects) cross references back to this section.

[76] Section 11 (1)(a) of the Act.

[77] Section 11 (1)(e) / Administering agency for the HNZPT Act (archaeological authority).

[78] Section 11 (1)(e) / Administering agency for the RMA (resource consents).

> SLPL is not seeking any access arrangements under the Crown Minerals Act.[79]

8.3 PRELIMINARY STEP FOR APPLICATIONS FOR RESOURCE CONSENT

As required by Section 30(2) of the Act, SLPL has notified ORC in writing of the Project. **Part F** to these application documents contains the response from the ORC that addresses the matters set out in Sections 30(3) to (6) of the Act.

For completeness, sections 31 to 37 of the Act do not apply to the Project.

8.4 REQUIREMENTS FOR A SUBSTANTIVE APPLICATION

Section 43 of the Act sets out that a substantive application:

> Must be lodged in the form and manner approved by the EPA.[80] The Application has been prepared to meet that requirement;

> Must explain how the project is consistent with the purpose of the Act (addressed in Sections 1.2 and 8.6 of this report);[81]

> Must demonstrate that the project does not involve any ineligible activities (addressed in Section 8.7 of this report);[82]

> Must, if the application is lodged by more than one authorised person, state the proposed approval to be held by each person.[83] SLPL is the only 'authorised person' for the referred project and is lodging the application;

> Must comply with any information requirements specified by the Minister and the requirements in clauses 5 to 9 of Schedule 5 of the Act. The Minister did not specify any information requirements in his referral decision. The requirements in clauses 5 to 7 of Schedule of the Act are set out in Section 1 of this report, and clearly point to where the necessary content is provided.[84] Clauses 8 and 9 of Schedule 5 are not relevant;

> Must state whether the application relates to a priority project and, if so, include confirmation that, to the best of the applicant's knowledge, there are no competing applications.[85] The Application is not a priority project;

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79 Section 29(1)(b) of the Act is therefore not applicable.

80 Section 43(1)(a) of the Act.

81 Section 43(1)(b)(i) of the Act. Section 43(1)(b)(ii) is not relevant because the Project was not referred as a staged Project.

82 Section 43(1)(c) of the Act.

83 Section 43(1)(d) of the Act.

84 Section 42(1)(e) and 42(3)(a) of the Act.

85 Section 43 (1)(h) of the Act.

- Must be made by the deadline specified in the Minister's referral notice. The application is made before the specified deadline of 26 August 2027;[86]
- Must not lodge a substantive application unless any fee, charge, or levy payable under regulations in respect of the application is paid.[87] SLPL has paid all relevant fees, changes and levies prior to lodging this Application.

8.5 DECISION MAKING CONSIDERATIONS UNDER THE ACT

8.5.1 Summary

Section 81 of the Act, and Clause 17 of Schedule 5, set out the matters for consideration by the Panel on a consent application. These matters are summarised below:

- A Panel must, for each approval sought in a substantive application, decide whether to grant the approval (and set conditions) or decline the approval;[88]
- The Panel must consider the substantive application, and any advice, report comment or other information received by the Panel,[89] including advice from administering agencies, local authorities, iwi authorities, treaty settlement entities, DOC and HNZPT;
- A Panel may only decline the approval in accordance with section 85 of the Act, which set out when Panels must decline approvals[90] (not applicable in the case of this Project) and when Panels may decline an approval – if the Panel forms the view that:
  - There are 1 or more adverse impacts in relation to the approval sought; and[91]
  - Those adverse impacts are sufficiently significant to be out of proportion to the project's regional or national benefits that the Panel has considered, even after taking into account:[92]
    - Any conditions that the Panel may set in relation to those adverse impacts; and[93]

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86 Section 43(1)(i)
87 Section 43 (1)(j) of the Act.
88 Section 81 (1) of the Act.
89 Section 81 (2) of the Act.
90 Section 85(1) of the Act.
91 Section 85 (3)(a) of the Act.
92 Section 85 (3)(b) of the Act.
93 Section 85 (3)(b)(i) of the Act.

- Any conditions or modifications that the applicant may agree to or propose to avoid, remedy, mitigate, offset, or compensate for those adverse impacts.[94]

- A Panel may not form the view that an adverse impact of a Project is sufficiently significant to be out of proportion to the regional or national benefits solely on the basis that the adverse impact is inconsistent with or contrary to a provision of a specified Act or any other document that a Panel must take into account or otherwise consider;

- A Panel must comply with section 83 of the Act in setting conditions[95] which requires that a Panel must not set a condition that is more onerous than necessary to address the reason for which it is set;

- In its decision, the Panel must take into account, the following matters (giving greatest weight to the purpose of the Act);[96]

  - The purpose of the Act; and

  - The provisions of Parts 2, 3, 6, and 8 to 10 of the RMA that direct decision making on an application for a resource consent (but excluding section 104D of the RMA); and

  - The relevant provisions of any other legislation that directs decision making under the RMA.

In respect to these matters:

- Section 1.2 and 8.6 of this report address how the Project demonstrably achieves the purpose of the Act;

- Section 9.2 of this report provides an assessment of the Project against the requirements of Part 2 of the RMA (being sections 5, 6 and 7 of the RMA);

- Part 3 of the RMA addresses the duties and restrictions under the RMA, all of which are addressed by the rule framework within the applicable district or regional plans, and the draft conditions contained in **Part C** of the application documents;

- Part 6 of the RMA addresses resource consents, with the key sections of the RMA that direct decision making being section 104 (consideration of applications), section 105

94 Section 85 (3)(b)(ii) of the Act.

95 Section 81(2)(d) of the Act.

96 Clause 17 (1) of Schedule 5 of the Act.

(matters relevant to certain applications) and section 107 (restriction on grant of certain discharge permits). In respect to these key sections of the RMA:

- The matters of consideration in section 104 of the RMA are addressed in this report in Section 6 (actual and potential effects),[97] Section 7 (effects management including offsetting and compensation)[98] and Section 9.3 (applicable statutory planning documents);[99]
- The matters of consideration in section 105 of the RMA are addressed subsequently in this report in Section 8.5.2;
- The matters of consideration in section 107 of the RMA are addressed subsequently in this report in Section 8.5.3; and

- Parts 8 to 10 are not relevant to the Project because Part 8 addresses designations and heritage orders, Part 9 addresses water conservation orders, Part 9A addresses freshwater farm plans, and Part 10 addresses subdivisions and reclamations.

In addition, it is noted that all persons performing and exercising functions, powers, and duties under the Act must act in a manner that is consistent with:[100]

- The obligations arising under existing treaty settlements; and
- Customary rights recognised under the Marine and Coastal Area (Takutai Moana) Act 2011.

Based on the assessment of the applicable treaty settlements and applications under the Marine and Coastal Area (Takutai Moana) Act 2011, there are no obligations or rights that would preclude the granting of the approvals as sought by SLPL.

8.5.2 Section 105 of the RMA – Matters Relevant to Discharge Permit Applications

In addition to the matters which the Panel must have regard to under section 104 of the RMA, section 105 sets out additional matters which must be considered when considering discharge permit applications. Section 105 states:

> *(1) If an application is for a discharge permit or coastal permit to do something that would contravene section 15 or section 15B, the consent authority must, in addition to the matters in section 104(1), have regard to—*

[97] Section 104 (1)(a) of the RMA.
[98] Section 104 (1)(ab) of the RMA.
[99] Section 104 (1)(b) of the RMA.
[100] Section 7 and Section 81 (7) of the Act.

(a) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and

(b) the applicant's reasons for the proposed choice; and

(c) any possible alternative methods of discharge, including discharge into any other receiving environment.

Discharges requiring resource consent include:

> A discharge permit for the discharge of stormwater to land and water during construction;

> A water permit to disturb the bed of Silver Stream to establish stormwater spillway structures;

> A discharge permit for the discharge of stormwater to land and water during operation; and

> A discharge permit for the discharge of industrial trade waste to land where it may enter water.

SLPL has taken an iterative approach to the development of the Project, as set out in Section 6 of this Application. This has included refining the design and construction methodology to ensure the effects on the environment are reduced from the outset. This has included changes to how the Project would be constructed, which would affect the scale and nature of discharges arising (for example stormwater treatment options and designs).

Erosion and sediment control measures are proposed to minimise effects of sedimentation. All earthworks will be undertaken in accordance with best practice and will occur progressively to ensure the adverse effects are avoided. Sediment and erosion controls will be implemented prior to earthworks commencing and maintained for the duration of the associated earthworks to ensure their effectiveness.

Management measures for the proposed earthworks are laid out in the draft CMP submitted with this Application. The CMP will be submitted to DCC for certification at least 20 working days prior to commencement of construction activities as a condition of consent and will include detailed earthworks, design plans and content as well as performance indicators of various earthworks control methods. Erosion and sediment control measures will also be managed through an Erosion and Sediment Control Plan that details construction and stormwater discharge effects management.

The technical assessments commissioned by SLPL has not identified any concerns with the proposed discharge methods and receiving environments for these contaminants.

Overall, the discharges requiring resource consent will not result in unacceptable adverse effects, are of a temporary or intermittent nature and no other practicable alternatives are available due to the size of the stormwater catchment represented by the Site and lack of a sufficiently sized reticulated network in the area.

8.5.3 Section 107 of the RMA – Restriction to Grant Certain Discharge Permits

Section 107 of the RMA specifies certain circumstances in which the Panel must not grant a discharge permit if after reasonable mixing, the contaminant or water discharged (either by itself or in combination with the same, similar, or other contaminants or water), is likely to give rise to all or any of the following effects in the receiving waters:

- The production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials;
- Any conspicuous change in the colour or visual clarity;
- Any emission of objectionable odour;
- The rendering of fresh water unsuitable for consumption by farm animals; and
- Any significant adverse effects on aquatic life.

It is considered that, given the suggested conditions of consent, the discharges associated with the Project will not give rise to any of the listed effects in the receiving waters after reasonable mixing. As such, section 107 of the RMA does not pose any restriction to the granting of the resource consent applications.

8.6 THE PROJECT MEETS THE PURPOSE OF THE ACT

Section 3 of the Act sets out its purpose, as follows:

> *The purpose of this Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.*

Section 6.3 of this report describes the significant regional and national economic benefits that the Project is expected to have. These benefits are summarised as follows:

- The SLIP will generate approximately $147.8 million (191.3 million) in value added impacts (including indirect and induced impacts) over the 10 years of construction;
- The SLIP will sustain 1,489 FTE jobs nationally during the 10-year construction period;
- The SLIP will create 21 transferred positions and add 104 net high-value permanent jobs during operation;

- The SLIP will enable growth in export volumes and market share beyond current facility capacity while supporting primary sector exports in Otago, Southland and South Canterbury;
- The SLIP will increase utilisation of existing rolling stock and track assets, with an initial uplift of 15,000 (30,000 TEU) and projected growth up to 40,000 wagons per annum expected;
- The SLIP will reduce heavy vehicle movements (approximately 30,000 per annum per annum) as the SLIP rail operations increase, which will lead to significant road maintenance cost savings and improved transport efficiency;
- The SLIP will reduce carbon, in the order of 1,050-1,100 tonnes per annum, and greenhouse gas emissions, and associated improvements to air quality; and
- The SLIP will improve supply chain resilience through multi-modal accessibility and reduced reliance on vulnerable transport routes delivering an enhanced competitiveness of Port Otago.

Under section 81(2)(aaa) of the Act, the Panel must consider the Minister's reasons for accepting the referral application when the Project was referred. The Minister was satisfied that the Project is an infrastructure or development project that would have significant or regional benefits as it "is an infrastructure project that would have significant regional benefits" because it:

- Has been identified as a priority project in a local government strategy, specifically the Future Development Strategy for Dunedin 2024-2054 jointly prepared by DCC and ORC [section 22(2)(a)(i)];
- Will deliver new regionally significant infrastructure by addressing critical capacity constraints at Port Otago, and it has secured $8.2 million in funding from the Regional Infrastructure Fund [section 22(2)(a)(ii)];
- Will deliver significant economic benefits in the Otago region, including capital investment of up to $147.8 million (which will be significant within Otago), the creation of over 1,400 FTE construction jobs and 104 net additional high-value jobs, improved freight efficiency and logistics, reduced road maintenance costs, strengthened supply chain resilience, and enhanced productivity for KiwiRail and Port Otago [section 22(2)(a)(iv)];
- Will support the Otago region's primary industries by improving logistics for agriculture and forestry goods [section 22(2)(a)(v)];

> Will support the reduction of greenhouse gas emissions by enabling a significant shift of freight from road to rail [section 22(2)(a)(vii)];

> Will provide infrastructure that could support recovery from natural hazards and climate-related events [section 22(2)(a)(viii)];

> Will address significant environmental issues, specifically climate change, through its contributions to emissions reduction and climate resilience [section 22(2)(a)(ix)];

> Is consistent with local or regional planning documents, including spatial strategies, specifically Dunedin City Council's Future Development Strategy 2024-2054 [section 22(2)(a)(x)]."

All of the matters listed by the Minister are addressed and demonstrated in the technical assessments provided with this Application.

On this basis, it is considered that the Project is entirely consistent with the purpose of the Act.

8.7 INELIGIBLE ACTIVITIES

Section 5 of the Act addresses ineligible activities which cannot be authorised under the Act. In this respect, the Project:

> Is not located on identified Māori land;[101]

> Is not located in a customary marine title area;[102]

> Is not located in a protected customary rights area;[103]

> Is not located on Māori customary land or land set apart as a Māori reservation;[104]

> Is not an aquaculture activity or an activity that is incompatible with aquaculture activities;[105]

> Does not require an access arrangement under Section 61 or 61B of the Crown Minerals Act;[106]

[101] Section 5 (1)(a) of the Act.
[102] Section 5 (1)(b) of the Act.
[103] Section 5 (1)(c) of the Act.
[104] Section 5 (1)(d) of the Act.
[105] Section 5 (1)(e) of the Act.
[106] Section 5 (1)(f) of the Act.

- Is not an activity that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the Act;[107]
- Is not located on any land listed in Schedule 4 of the Crown Minerals Act 1991,[108] or within a national reserve under the Reserves Act 1977;[109]
- Is not located on a reserve held under the Reserves Act that is vested in someone other than the Crown or a local authority or managed by someone other than the Department of Conservation or a local authority;[110]
- Is not a prohibited activity under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012, or section 15B or 15C of the Resource Management Act 1991;[111]
- Is not a decommissioning-related activity of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012;[112] and
- Is not an activity undertaken or the purposes of an offshore renewable energy project.[113]

This Application is, therefore, not for an ineligible activity.

8.8 CONSISTENCY WITH EXISTING TREATY SETTELEMENTS

Section 7 of the Act requires all persons performing and exercising functions, powers and duties to act in a manner that is consistent with obligations arising out of existing Treaty settlement as well as customary rights recognised under the marine and coastal area legislation.[114]

The FTAA then achieves section 7 through:

- Prescribing that decision-makers must comply with the procedural requirements of the FTAA and give any document the same or equivalent effect through the process as set out in the Treaty Settlement;[115]

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[107] Section 5(1)(g) of the Act.
[108] Section 5 (1)(h) of the Act.
[109] Section 5 (1)(i) of the Act.
[110] Section 5 (1)(j) & (k) of the Act.
[111] Section 5 (1)(l) of the Act.
[112] Section 5 (1)(m) of the Act.
[113] Section 5 (1)(n) of the Act.
[114] Section 7 (1) of the Act.
[115] Sections 16, 53, and 82 of the Act.

> Providing reports under section 18 on Treaty settlements and other matters, and the review of draft conditions;[116]

> Consultation processes to consider Treaty Settlements;[117] and

> Permitting the Panel to decline the approval if it would breach section 7 (being the obligations under Treaty settlements and customary rights under marine and coastal area legislation) or set conditions "to recognise or protect" a relevant Treaty Settlement or obligations under marine and coastal area legislation.[118]

Because the Project is a referred project, a Treaty Settlements and other obligations (section 18) report was prepared for the referral application. The Report for the referral application records that, as the Applicant is seeking RMA approvals only, the relevant provisions of the Ngāi Tahu Claims Settlement Act 1998 are:[119]

> There are no statutory acknowledgements in the SLIP area, which need to be considered in the RMA process; and

> There are no particular relevant provisions of the Ngāi Tahu Claims Settlement Act 1998.

The report also acknowledges that Kāi Tahu views will be considered in the approvals process: [120]

> The Crown upholds its relationship with Kāi Tahu through respecting its reviews of resource management matters and enabling effective involvement in resource management decision-making; and

> Iwi and hapū are likely to have cultural associations with the area beyond what is specified in the Treaty settlement and other arrangements.

SLPL is committed to open and transparent engagement with Te Rūnanga o Ōtākou via the ongoing consultation with the Kā Rūnaka (as detailed in Section 5).

The engagement that has occurred with mana whenua has included the following:

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[116] Sections 18, and 72 of the Act.

[117] Sections 11(1), 13 of the Act.

[118] Sections 84 and 85 of the Act.

[119] Fast-track Approvals Act 2024 – Treaty settlement and other obligations (Section 18) report, FTAA-2505-1059 Southern Link Inland Port, at [28] to [32].

[120] Fast-track Approvals Act 2024 – Treaty settlement and other obligations (Section 18) report, FTAA-2505-1059 Southern Link Inland Port, at [28] to [32].

- A process agreement was entered into between SLPL and the Kā Rūnaka who represent mana whenua interests with respect to the surrounding region;
- Numerous formal and informal discussions have been had, including an onsite meeting with representatives from the Kā Rūnaka;
- The Kā Rūnaka has been provided technical reports to review and comment on;
- Considerations and amendments have been made to relevant technical reports where comments have been raised by the Kā Rūnaka;
- A draft TIA has been prepared on behalf of the Kā Rūnaka by Aukaha and Dr Gail Tipa; and
- SLPL has provided updated technical assessment and reporting to the Kā Rūnaka in response to the draft TIA.

SLPL will continue to work in partnership with the Kā Rūnaka who represent mana whenua interests with respect to the SLIP.

Cultural effects have been considered in Section 6.2.

9. APPROVALS RELATING TO THE RESOURCE MANAGEMENT ACT 1991

9.1 INTRODUCTION

Clauses 5-7 in Schedule 5 of the Act set out the information requirements for a substantive application for approvals required under the RMA. As set out in Section 1.3 of this Application, this Application provides the required information under Schedule 5 of the Act.

Section 9 of this report addresses the following statutory planning matters required to be addressed by the provisions of Schedule 5 of the Act:

> A further assessment of the activity against Sections 5, 6 and 7 of the RMA;

> An assessment of the Project against the relevant provisions in any of the documents specified under Schedule 5 (Clause 5(1)(h)); and

> Treaty Settlements.

The decision-making criteria set out in Schedule 5 (Clause 17) of the Act is set out in Section 8.5.

9.2 PART 2 OF THE RESOURCE MANAGEMENT ACT 1991

9.2.1 Overview

Schedule 5, clause 5(1)(g) of the Act requires an assessment of the Project against Sections 5, 6 and 7 of the RMA. While promoting sustainable management is the purpose of the RMA (as per section 5 of the RMA), that is not the purpose of the Act, and sustainable management must be given less weight in the Panel's overall evaluation than facilitating the delivery of infrastructure and development projects with significant regional or national benefits.[121]

The Panel must 'take into account' Part 2 (purpose and principles), Part 3 (duties and restrictions under the RMA) and Part 6 (resource consents) as well as Parts 8-10 of the RMA, while giving the greatest weight to the purpose of the Act.[122]

[121] Schedule 5, Clause 17 (1)(a) of the Act.

[122] Schedule 5, Clause 17 (1)(b) of the Act.

9.2.2 Section 5 of the RMA

The purpose of the RMA is to promote the sustainable management of natural and physical resources. The Project will enable social and economic wellbeing by providing opportunities to import and export to the southern region, reducing reliance on heavy vehicle movements on the roads and reducing carbon emissions, providing employment opportunities during construction, use and operation of the SLIP as well as removing pressure to expand the Port Chalmers port in a coastal environment. These matters are discussed further in Sections 2 and 6 of this Application.

With the environmental mitigations proposed as part of the Project, the Project will safeguard the life-supporting capacity of air, water, and ecosystems. The life-supporting capacity of soil is discussed in Section 9.3.5 of this Application and weighs the benefits of the Project against the loss of HPL.

The avoidance, remediation or mitigation of adverse effects does not require that there be no residual effects on the environment. Instead, Section 5(2)(c) of the RMA contemplates adverse effects, the acceptability of which depend on and need to be assessed in the context of each application. Sections 6 and 7 of this report provide details on the measures proposed by SLPL to avoid, remedy or mitigate the actual and potential effects of the Project on the environment and to manage effects on the wellbeing of people in accordance with Section 5 of the RMA. Conditions proposed by SLPL are in **Part C** of this Application.

9.2.3 Sections 6 and 7 of the RMA

With respect to the relevant matters in Sections 6 and 7 of the RMA, the following points are pertinent:

- Section 6(e), Section 7(a) and (aa) of the RMA are all relevant to the Project and SLPL has been engaging with Te Rūnanga o Ngāi Tāhu and the Kā Rūnaka for the region, being Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, and Te Rūnanga o Ōtākou, who represent mana whenua interests with respect to the SLIP;
- A draft TIA has been prepared by Aukaha on behalf of the Kā Rūnaka to understand any actual and potential effects on the Site and surrounding property, which is also relevant to Section 6(e), Section 7(a) and (aa). It was not finalised at the time of filing the Application, but SLPL is working closely with the Kā Rūnaka to ensure they have the necessary information for it to be finalised and endorsed by Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, and Te Rūnanga o Ōtākou;
- The Project is not "inappropriate" in the context of Section 6(a) or (b) of the RMA. The Project will enhance the natural character values of Silver Stream through the

implementation of natural character enhancement works, and the Site is not within or near an outstanding natural feature or landscape;

- SLPL is proffering careful management of effects associated with the Project to protect areas of significant indigenous biodiversity and habitats with adverse effects being avoided where possible, or mitigated to low, or less than minor, in accordance with Section 6(c), with the exception of landscape and visual effects which are assessed as being moderate (not significant) as detailed further in Section 6;
- The Project will not create any additional constraints on public access to Silver Stream or its tributaries or any other surface water body in the vicinity of the Project (in accordance with Section 6(d));
- An Archaeological Authority (Archaeological Authority 2026-362) has already been obtained from HNZPT for works on the Site, including in relation to the removal of all buildings and visible archaeology relating to the onsite archaeological site 'Holmhead Farm' (Section 6(f));
- Particular consideration has been given to the management of significant risks from natural hazards in the technical assessments commissioned by SLPL, and it is considered that there are appropriate factors of safety in the design of the various elements of the Project (Section 6(h));
- Amenity values of the Site, and broader areas adjacent to the Project, will be maintained by the imposition of mitigation planting, screening, building design controls and natural character alignment of Silver Stream (Section 7(c));
- The SLIP seeks to utilise connections to the DCC water and wastewater reticulation network which will avoid further allocation pressure on Silver Stream (Section 7(b));
- Based on the conclusions outlined in Section 6 of this Application, it is considered that particular regard has been given to the intrinsic values of ecosystems and to the maintenance of the quality of the environment. Matters relating to the quality of the environment enjoyed by adjacent landowners are also addressed in detail in Sections 3 and 6 of this Application (Sections 7(d), (f) and (g));
- Potential effects on ecosystems, including freshwater and terrestrial ecology, are described in Section 6 of this Application (Section 7(h));
- The Project will not impact upon the habitats of trout and salmon (Section 7(h)); and
- The effects of climate change have been considered throughout this report and in the various technical reports, attached in **Part B** of these application documents. The SLIP will significantly reduce greenhouse gas emissions associated with freight transport

through a predicted 70% $C0_2e$ saving from the mode-shift of freight from road to rail. There will be a significant reduction in heavy vehicle movements and lowering of associated transport emissions. It is expected this will avoid 1,050-1,100 tonnes per annum (net) of CO_2e. Further, the flooding / stormwater design has been adjusted for climate projections (Section 7(i)).

9.2.4 Section 8 of the RMA

While under the Act, Section 8 of the RMA need not be addressed, for completeness it is noted that SLPL is not a "person exercising functions and powers under the RMA" in Section 8 of the RMA for the purpose of the Project. Section 7 of the Act includes its own direction relating to Treaty settlements and recognised customary rights, which is addressed in Section 8.8 of this Application. That said, SLPL is undertaking engagement with iwi in good faith and in a manner that reflects the scale and significance of the Project. This work is, and will continue to be, ongoing as provided for in the proposed condition set (in **Part C**).

9.2.5 Summary

Overall, and based on the technical assessments that have been commissioned by SLPL, it is considered that the Project will promote the sustainable management of natural and physical resources in accordance with Sections 5, 6 and 7 of the RMA.

9.3 RELEVANT PLANNING DOCUMENTS

9.3.1 Overview

Clauses 5 (1)(h) and 5 (2) of Schedule 5 of the Act require an assessment of the Project against relevant RMA planning documents. An assessment of the Project against these documents must include an assessment of the Project against any relevant objectives and policies (the rules are addressed in Section 4 and **Part G** of this Application). The relevant statutory planning documents are considered to be:

- Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ("**NES-CS**");
- National Policy Statement for Freshwater Management 2020 ("**NPS-FM**");
- National Policy Statement on Urban Development 2020 ("**NPS-UD**");
- National Policy Statement for Highly Productive Land 2022 ("**NPS-HPL**");
- National Policy Statement for Indigenous Biodiversity 2023 ("**NPS-IB**");
- National Policy Statement for Infrastructure 2025 ("**NPS-I**")

- National Policy Statement for Natural Hazards 2025 (“**NPS-NH**”);
- Proposed Otago Regional Policy Statement (**“Proposed RPS”**);
- Operative Otago Regional Policy Statement (“**Operative RPS**”)
- Regional Plan: Water for Otago (“**Regional Water Plan”**);
- Regional Plan: Waste for Otago (“**Regional Waste Plan**”);
- Regional Plan: Air for Otago (“**Regional Air Plan**”); and
- Dunedin City District Plan (“**District Plan**”).

Each of these policy statements and plans are considered further below. Only relevant objectives and policies are considered. A full assessment of actual and potential adverse effects associated with the Project is not included in this Section and instead can be found in Section 6 of this Application, and conditions to avoid, remedy and mitigate these effects can be found in **Part C**.

In addition to the above, it is understood that there is one iwi management plan that is applicable to the Project area - Kāi Tahu ki Otago Natural Resource Management Plan 2005. This plan is addressed later in this section of the Application.

It is noted that future operations at the SLIP may involve other activities (such as the use and storage of hazardous substances, and discharges to air associated with a diesel generator or other activities which are permitted activities) for which approval (or a certificate of compliance) is not sought in this Application. Given that, the following statutory planning documents have not been considered further in this assessment, and will be addressed in separate resource consent applications when, or if, applicable:

- National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023;
- Resource Management (National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat) Regulations 2023;
- Resource Management (National Environmental Standards for Freshwater) Amendment Regulations 2020:
- Resource Management (National Environmental Standards for Air Quality) Regulations 2004; and
- Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2023.

9.3.2 National Environmental Standard for Assessing and Managing Contaminants in Soil

The NES-CS came into effect in January 2012. The NES-CS seeks to ensure that land affected by contaminants in soil is appropriately identified and assessed before it is developed. If necessary, affected land will need to be remediated or the contaminants contained to make it safe for human use.

Section 4 (Approvals Required) of this Application identifies that approval is required under Regulation 10(2) of the NES-CS and the rule assessment for the SLIP is provided in **Part G** of this Application.

A full assessment of actual and potential adverse effects associated with contaminated land on the Site is provided in Section 6 and conditions to avoid, remedy and mitigate these effects can be found in **Part C**. The NES-CS does not contain objectives or policies for assessment.

9.3.3 National Policy Statement for Freshwater Management

Overview

The NPS-FM came into effect on 3 September 2020 and was most recently amended in December 2025. It sets out the objectives and policies for freshwater management (including groundwater)[123] under the RMA. The objective of the NPS-FM is to ensure that natural and physical resources are managed in a way that prioritises:

- First, the health and wellbeing of water bodies and freshwater ecosystems;
- Second, the health needs of people; and
- Third, the ability of people and communities to provide for their social, economic and cultural wellbeing, now and in the future.

Central to the NPS-FM is the concept of Te Mana o Te Wai, which is described as:

> *"a concept that refers to the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment. It protects the mauri of the wai. Te Mana o te Wai is about restoring and preserving the balance between the water, the wider environment, and the community."*

Te Mana o Te Wai encompasses six principles relating to the roles of tangata whenua and other New Zealanders, these are:

[123] NPSFM Clause 1.5 (1).

- **Mana whakahaere:** the power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and wellbeing of, and their relationship with, freshwater;
- **Kaitiakitanga:** the obligation of tangata whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations;
- **Manaakitanga:** the process by which tangata whenua show respect, generosity, and care for freshwater and for others;
- **Governance:** the responsibility of those with authority for making decisions about freshwater to do so in a way that prioritises the health and wellbeing of freshwater now and into the future;
- **Stewardship:** the obligation of all New Zealanders to manage freshwater in a way that ensures it sustains present and future generations; and
- **Care and respect**: the responsibility of all New Zealanders to care for freshwater in providing for the health of the nation.

The Resource Management (Freshwater and Other Matters) Amendment Act 2024 came into effect on 25 October 2024 and makes targeted changes to the RMA and national direction, which includes excluding the hierarchy of obligations in the NPS-FM from consideration in resource consenting while a review and replacement of the NPS-FM is undertaken. In particular, the Amendment Act requires that a consent authority, when considering applications under section 104 of the RMA, must not have regard to clause 1.3(5) or 2.1 of the NPS-FM which relates to the hierarchy of obligations.[124]

It is noted, however, that the concept of Te Mana of Te Wai is still a relevant consideration for the purposes of this resource consent application being made under the Act, as the Project needs to be assessed against the regional plans that have been prepared in a way that gives effect to the hierarchy of obligations in Te Mana of Te Wai.

SLPL has built an ongoing relationship with the Kā Rūnaka and associated hapū who represent mana whenua interest for the SLIP. This includes engaging with Aukaha who were appointed by the Kā Rūnaka to review technical documents and provide mana whenua input. The onsite stormwater management design is the primary factor that could potentially impact freshwater, and the management systems have been designed to avoid and / or minimise any adverse effects on Silver Stream.

[124] Section 104(2F) of the RMA. Nothing in the Act excludes the application of section 104(2F) of the RMA.

In respect of the NPS-FM policies, those of most relevance to this application are discussed in detail below. We note that no natural inland wetlands, habitats of trout or salmon, or loss of river extent are relevant to the Project.

Policies 1 and 2

Policy 1 of the NPS-FM seeks to ensure that freshwater is managed in a way that gives effect to Te Mana o te Wai. Policy 2 seeks to ensure that tangata whenua are actively involved in freshwater management and Māori freshwater values are identified and provided for.

A draft TIA was prepared by Aukaha on behalf of the Kā Rūnaka to address cultural impacts of the Project on mana whenua interests, values and Treaty rights. The draft TIA identifies that the Taiari River and Waipouri-Waihola system, remain central to the cultural identity and kaitiakitaka obligations of Te Runanga o Ōtākou. SLPL recognises the matters raised in the draft TIA, particularly in regard to the health and vitality of Silver Stream. SLPL is committed to ongoing collaboration with the Kā Rūnaka to engage in matters relating to freshwater and cultural values.

Policy 3

Policy 3 of the NPS-FM requires that freshwater is managed in an integrated way that considers the effects of the use of land and development of land on a whole of catchment basis, including the effects on the receiving environments.

While this policy is focused on actions to be undertaken by the ORC, it is noted that the technical assessments commissioned by SLPL has considered the actual and potential effects the Project could have on land and freshwater resources in an integrated manner. This includes considering all actual and potential effects associated with the Project, as set out in Section 6 of this Application.

While freshwater, as referred to in the NPS-FM includes groundwater, there are no direct references to groundwater or groundwater management within the policies of the NPS-FM. Notwithstanding this, the cumulative freshwater effects of the Project have been canvased in detail by E3 Scientific (2026b) and this assessment is provided in **Part B** of this Application. Overall, integrated management of freshwater is therefore at the centre of SLPL's management approach.

Policy 5

Policy 5 of the NPS-FM relates to ensuring that (including through the National Objectives Framework) the health and wellbeing of degraded water bodies and freshwater ecosystems

is improved, and that where water is not degraded it is maintained or improved (if the community chooses).

The National Objectives Framework in Subpart 2 of the NPS-FM directs how regional councils must set objectives, policies, and rules about freshwater in their regional plans. They must do this by establishing freshwater management units across their regions and identifying the values that communities hold for the water in those areas. Councils are required to maintain or improve water quality within their region.

Sub-part 2 of the NPS-FM sets out the approach regional councils must follow in setting freshwater objectives, attributes and limits for individual water bodies. The NPS-FM requires that regional councils must consider freshwater values and how they should apply to local or regional circumstances. Appendix 1A of the NPS-FM sets out compulsory national values, while other values to be considered are set out in Appendix 1B.

There are four compulsory national values, as follows:

> Ecosystem health;

> Human contact;

> Threatened species; and

> Mahinga kai.

Appendix 2 of the NPS-FM sets out the attribute tables that are applicable to a waterbody and are related to the compulsory national values of ecosystem health and human contact.

Based on the Freshwater Ecology Assessment, the discharges from the Site will have less than minor effects on Silver Stream as assessed in Section 6 of this Application and are unlikely to impact upon the ability to achieve the applicable freshwater objectives and the compulsory national values.

Policy 7

Policy 7 of NPS-FM seeks to ensure the loss of river extent and values is avoided to the extent practicable. This is supported by clause 3.24 of the NPS-FM which requires regional councils to include a new policy in their regional plans which guides how this Policy 7 will be implemented at a regional level. Collectively, these provisions direct that river loss should be avoided. As the extent of Silver Stream will be reinstated following the instream works to construct the spillways, no loss of river extent is proposed, and the discharges to water associated with the Project will result in a 'low' level of effect on Silver Stream, the Project is consistent with Policy 7.

Policy 9

Protection of habitats of indigenous freshwater species is the focus of Policy 9. Silver Stream provides habitat for two 'threatened' and three 'at risk' fish species – longfin eel, lamprey, Taieri flathead galaxias, īnanga and giant kokopu – as well as several non-threatened indigenous fish species. Because of this, the ecological value of the stream is high. With the mitigation measures in place, the effects on the stream will be low (less than minor). These measures include:

- Adhering to standard erosion and sediment control measures throughout construction activities;
- Works in the stream avoiding fish spawning times (May – November) where practicable, or obtaining any necessary approvals under the Freshwater Fisheries Regulations 1983, and implementing appropriate measures so to ensure any effects of fish spawning are minimised as far as practicable;
- Establishing maintenance regimes for the stormwater treatment systems and utilising appropriate treatment technologies such as Gross Pollutant Traps or Universal Pollutant Traps; and
- Continuous downstream temperature monitoring in the stream for the first two summers following the stormwater attenuation pond establishment.

Policy 12

Policy 12 of the NPS-FM sets a national target for increasing proportions of rivers (and lakes) that are suitable for primary contact to at least 80% by 2030 and 90% no later than 2040. Based on the conclusions of the Freshwater Ecology Assessment, the activities occurring as part of the Project will not impede ORC's ability to achieve the requirements of Policy 12 of the NPS-FM.

Policy 13

The focus of Policy 13 of the NPS-FM is to ensure that the condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.

SLPL is proposing comprehensive monitoring as part of the Project, as detailed in Section 7 of this Application, with regular reporting to ORC proposed.

Policy 15

Enabling communities to provide for their social, economic and cultural wellbeing, in a manner that is consistent with the NPS-FM, is the focus of Policy 15.

As described in the preceding sections, the Project is being undertaken in a manner that is consistent with the relevant policy directives of the NPS-FM. Accordingly, the Project achieves the balance sought from Policy 15, and enables the community to continue to provide for its social and economic wellbeing in a manner that is consistent with the NPS-FM.

Summary

For the reasons set out above, the Project is consistent with the provisions of the NPS-FM.

9.3.4 National Policy Statement on Urban Development 2020

Overview

The NPS-UD sets out the objectives and policies for planning for well-functioning urban environments under the RMA. The NPS-UD came into effect on 20 August 2020 and was last amended in May 2022.

Objectives

The objectives of relevance to the Project seek the following outcomes:

- New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic and cultural wellbeing and for their health and safety – now and into the future; [125]
- More businesses are able to be located in areas of an urban environment; [126]
- New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations; [127]
- Planning decisions relating to urban environments take into account the principles of the Treaty of Waitangi; [128]

[125] NPS-UD Objective 1.
[126] NPS-UD Objective 3.
[127] NPS-UD Objective 4.
[128] NPS-UD Objective 5.

- Local authority decisions on urban development that affect urban environments are: [129]
  - Integrated with infrastructure planning and funding decisions; and
  - Strategic over the medium term and long term; and
  - Responsive, particularly in relation to proposals that would supply significant development capacity; and
- New Zealand's urban environments support reductions in greenhouse gas emissions, and are resilient to the current and future effects of climate change. [130]

These objectives are implemented via several policies, some of which are of direct relevance to the Project, which are discussed in the following subsection.

Policy 1

Policy 1 requires that planning decisions contribute[131] to well-functioning urban environments, which are urban environments that have or enable a variety of sites that are suitable for different business sectors in terms of location and site size. This policy also sets out that 'well-functioning' urban environments:

- Have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;
- Support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- Support reductions in greenhouse gas emissions; and
- Are resilient to the likely current and future effects of climate change.

DCC and ORC have prepared a FDS, which is required by the NPS-UD. The FDS sets out the high-level strategic vision for how Dunedin will be supported to:

- Achieve well-functioning urban environments in existing and future urban areas;
- Provide at least sufficient development capacity for housing and business land needs over the next 30 years to meet expected demand; and
- Assist with the integration of planning decisions under the RMA and infrastructure planning and funding decisions.

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[129] NPS-UD Objective 6.

[130] NPS-UD Objective 8.

[131] The definition of planning decisions in the NPS-UD includes 'a resource consent'.

The FDS sets out the need for an inland port to address capacity issues at Port Chalmers, and identifies the Dukes Road North site as an 'indicative area for an inland freight hub' – as shown in Figure 9-1 below.

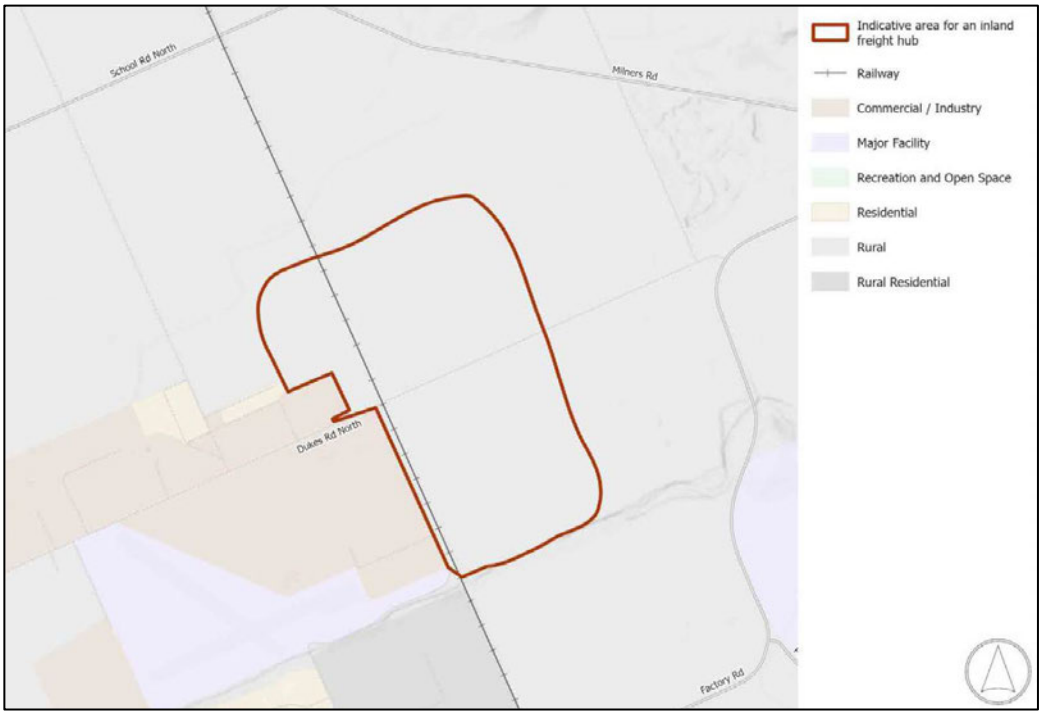


Figure 9-1: Potential Freight Hub Location (DCC FDS, 2024)

The FDS sets out the following in respect to the establishment of an inland port:

> *Freight transport is a significant issue for Dunedin. It is critical to achieving a thriving urban and rural economy within the district and wider region. Current freight transport routes include the use of trucks to move freight to and from Port Chalmers and this has significant consequences in terms of road maintenance, safety and connectivity for active transport users within the city and high carbon emissions.*
>
> *Port Chalmers is space constrained meaning it has only limited capacity to increase freight volumes before further land reclamation would be necessary. Increasing the proportion of freight moved by rail would have significant benefits in terms of efficiency, reduced carbon emissions, road safety and amenity. Achieving this 'mode shift' requires a fundamental change to the way freight is handled within Dunedin.*
>
> *Establishment of an inland freight hub would enable Port Otago to relocate aspects of its operations such as the container depot, freeing up space at Port Chalmers enabling Port Otago to increase freight capacity, operational efficiency and resilience to supply chain disruption. The DCC has identified the need for an inland freight hub south of Dunedin in its Zero Carbon Plan.*

Accordingly, an indicative site for an inland freight hub is shown in this FDS. This will facilitate further investigations into its feasibility and support stakeholders – including NZTA Waka Kotahi, KiwiRail, DCC, ORC, Port Otago and freight logistics operators – to undertake investigations to determine whether the indicative site is appropriate. Identification of an indicative site will also ensure that other strategic planning initiatives, such as the strategic transport study for Mosgiel (to be undertaken 2024-2027), consider the potential for an inland freight hub.

The freight hub will not comprise general 'industrial zoned' land or any other land use including retail, commercial or residential activities. If it proceeds to the approvals stage it will require site specific zoning provisions that focus solely on warehousing and goods storage and movements.

In respect to the FDS, the following is noted:

> The Project is within the area identified in the FDS as being potentially appropriate for an inland port;

> This Application includes the outcomes of the further investigations into the Site's feasibility for an inland port; and

> This Application is not seeking any zoning changes – the resource consents being sought under the Act are specific to warehousing and goods storage and movements (and do not include any retail, commercial or residential activities).

The Project is therefore demonstrably consistent with the FDS, and the NPS-UD.

Policy 2

Policy 2 requires DCC (being a Tier 2 local authority) to, at all times, provide at least sufficient development capacity to meet expected demand for business land over the short, medium and long term.

As detailed earlier in relation to Policy 1, the FDS has been prepared to meet the requirements of the NPS-UD in ensuring there is sufficient development capacity – which includes provision for an inland port.

Policy 6

When making planning decisions that affect urban environments, decision makers are to have regard to the following matters, in accordance with Policy 6:

> The planned urban built form anticipated by those RMA planning documents that have given effect to the NPS-UD;

- That the planned urban built form in those RMA planning documents may involve significant changes to an area, however those changes, of themselves, are not an adverse effect;
- Change may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types;
- The benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1);
- Any relevant contribution that will be made to meeting the requirements of the NPD-UD to provide or realise development capacity; and
- The likely current and future effects of climate change.

All of the matters addressed by Policy 6 have been considered within this Application, and within the FDS discussed earlier in this section.

Summary

It is therefore considered that the Project is consistent with the provisions of the NPS-UD.

9.3.5 National Policy Statement for Highly Productive Land

Overview

The NPS-HPL came into force on 17 October 2022 and was most recently amended in December 2025, with the single objective being that HPL is protected for use in land-based primary production, both now and for future generations.

HPL means land that has been mapped in accordance with criteria set out in the NPS. However, until a regional policy statement containing maps of HPL in the region is operative, each relevant territorial authority must treat as HPL any land that is:

- Zoned general rural or rural production at the commencement date; and
- LUC 1, 2, or 3 land.

Land identified for future urban development, or subject to a notified plan change to rezone it from general rural or rural production to urban or rural lifestyle, is not HPL (irrespective of LUC). While the land is identified in the FDS as an 'indicative area for an inland freight hub', it is not clearly identified as for future urban development, so that exclusion does not neatly apply.

Objectives and Policies

As has previously been described, the Site consists almost entirely of LUC 1 land that is zoned Rural, and is thus, HPL under the interim definition in the NPS-HPL. In that regard, the objective of the NPS-HPL, which is that HPL is protected for use in land based primary production, both now and for future generations, applies.

The objective is implemented via nine policies, which seek:

> That HPL is recognised as a resource with finite characteristics and long- term values for land-based primary production; [132]

> The identification and management of HPL is undertaken in an integrated way that considers the interactions with freshwater management and urban development; [133]

> That HPL is mapped and included in policy statements and plans; [134]

> The use of HPL for land-based primary production is prioritised and supported; [135]

> The urban rezoning of HPL is avoided, except as provided in the NPS-HPL; [136]

> The rezoning and development of HPL as rural lifestyle is avoided, except as provided in the NPS-HPL; [137]

> The subdivision of HPL is avoided, except as provided in this NPS-HPL; [138]

> That HPL is protected from inappropriate use and development; and[139]

> Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on HPL. [140]

The most pertinent of these policies to this Application are addressed through Part 3 of the NPS-HPL which sets out the circumstances where development on HPL is not inappropriate, providing a pathway for development.

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[132] NPS-HPL Policy 1.
[133] NPS-HPL Policy 2.
[134] NPS-HPL Policy 3.
[135] NPS-HPL Policy 4.
[136] NPS-HPL Policy 5.
[137] NPS-HPL Policy 6.
[138] NPS-HPL Policy 7.
[139] NPS-HPL Policy 8.
[140] NPS-HPL Policy 9.

Part 3 of the NPS-HPL

Part 3 of the NPS-HPL provides a non-exhaustive list of things that local authorities must do to give effect to the objectives and policies of the NPS-HPL. Of most relevance to the Project are clauses 3.9 and 3.10. Clause 3.9(2) sets out the circumstances where a use or development of HPL is not inappropriate, including (for example):

- It provides for supporting activities on the land (Clause 3.9(2)(a));
- It provides for intensive indoor primary production or greenhouse activities (Clause 3.9(2)(aa));
- It addresses a high risk to public health and safety (Clause 3.9(2)(b));
- It is for, or associated with, a matter of national importance under section 6 of the RMA (Clause 3.9(2)(c));
- It is on specified Māori land (Clause 3.9(2)(d));
- It is for the purpose of protecting, maintaining, restoring or enhancing indigenous biodiversity (Clause 3.9(2)(e));
- It provides for the retirement of land from land based primary production for the purposes of improving water quality (Clause 3.9(2)(f));
- It is a small-scale or temporary land-use activity that has no impact on the productive capacity of the land (Clause 3.9(2)(g));
- It is for an activity by a requiring authority in relation to a designation or notice of requirement under the Act (Clause 3.9(2)(h));
- It provides for public access (Clause 3.9(2)(i)): or
- It is associated with one of the following, and there is a functional or operational need for the use or development to be on the HPL (Clause 3.9(2)(j)):
    - (i) The development, operation, or decommissioning of specified infrastructure, including (but not limited to) its construction, maintenance, upgrade, expansion, replacement, or removal:
    - (ii) The maintenance, operation, upgrade, or expansion of defence facilities operated by the New Zealand Defence Force to meet its obligations under the Defence Act 1990:
    - (iii) The extraction of minerals and ancillary activities that provide significant national or regional benefit:
    - (iv) Quarrying activities that provide significant national or regional benefit.

Just one of these matters needs to be relevant. If they are, under clause 3.9(3) territorial authorities must take measures to ensure that any use or development on HPL:

> Minimises or mitigates any actual loss or potential cumulative loss of the availability and productive capacity of HPL in their district ((Clause 3.9(3)(a)); and

> Avoids if possible, or otherwise mitigates, any actual or potential reverse sensitivity effects on land-based primary production activities from the use or development ((Clause 3.9(3)(b)).

The criteria which apply to the SLIP are clauses 3.9(2)(a), (c) and (j).

Under clause 3.9(a), although the SLIP will indirectly support land-based primary production at a systems level by enabling efficient port access, consolidation, and increased reliability for the export of primary commodities, the SLIP does not directly provide for supporting activities on the land.

With regard to clause 3.9(2)(c), the Project is not for, or associated with, a matter of national importance under Section 6[141] of the RMA.

In relation to clause 3.9(2)(j)(i), although the SLIP has a functional need for its development on HPL, the Project will not meet the definition of 'specified infrastructure'[142] as the proposed SLIP is not identified in a plan or policy statement as being regionally or nationally significant and the port related commercial activities are not being carried out at a listed port (in Schedule 1 of the Civil Defence Emergency Act 2002).

Overall, the criteria under clause 3.9(2)(a) – (j) do not apply to the Project or will not be met by the Project and development is not exempt from being inappropriate under clause 3.9.

Clause 3.10 of the NPS-HPL sets out that territorial authorities may only allow the HPL to be subdivided, used, or developed for activities not otherwise enabled under clauses 3.7, 3.8, or 3.9 if satisfied that:

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[141] These matters relate to the preservation of natural character of the coastal environment, protection of outstanding natural features and landscapes, indigenous vegetation and significant habitats of indigenous fauna, public access, relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga, historic heritage, protected customary rights and natural hazards.

[142] Specified infrastructure is defined as any of the following: (a) infrastructure that delivers a service operated by a lifeline utility; (b) infrastructure that is recognised as regionally or nationally significant in a National Policy Statement, New Zealand Coastal Policy Statement, regional policy statement or regional plan: [...]

- There are permanent or long-term constraints on the land that mean the use of the HPL for land-based primary production is not able to be economically viable for at least 30 years; and
- The Project:
  - Avoids any significant loss (either individually or cumulatively) of productive capacity of HPL in the district;
  - Avoids the fragmentation of large and geographically cohesive areas of HPL;
  - Avoids if possible, or otherwise mitigates, any potential reverse sensitivity effects on surrounding land-based primary production from the subdivision, use, or development; and
- The environmental, social, cultural and economic benefits of the subdivision, use, or development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of HPL for land-based primary production, taking into account both tangible and intangible values.

In summary, AbacusBio Limited (2026) determines that the SLIP meets the exemption criteria relating to permanent or long-term constraints under clause 3.10 of the NPS-HPL as:

- The evaluation demonstrates that permanent and long-term constraints relating to location, soil drainage and flooding risk mean that land-based primary production cannot be viably sustained (economically) on the Site for at least 30 years (clause 3.10(1)(a));
- The development of the SLIP avoids significant loss of productive capacity, avoids fragmentation of large and geographically cohesive HPL, cannot avoid and therefore mitigates reverse sensitivity effects on surrounding land-based primary production (clause 3.10(1)(b));
- The existing environmental, social, and economic values of the Site as HPL are limited, and when weighed against the wider benefits of the proposed development, the overall balance favours the development and operation of the SLIP (clause 3.10(1)(c));
- A full evaluation of reasonably practicable alternative land-based primary production, land management improvements, boundary adjustments, and alternative production strategies has been undertaken which confirms the permanent and long-term constraints on economic viability (clause 3.10(2)); and
- Consideration of future productive potential and landholding impacts (clause 3.10(3)) and the size of the land holding (clause 3.10(4)) further support this conclusion.

Summary

While the Site is HPL under the NPS-HPL, the exemptions pathway for developing the land in clause 3.10 is satisfied.

9.3.6 National Policy Statement for Indigenous Biodiversity

Overview

The NPS-IB came into force in 2023 and was most recently amended in December 2025. The scope of the NPS-IB is limited to terrestrial ecosystems (and some aspects of wetlands) and applies across all land types in New Zealand – on private and public land.[143]

Objective

Central to the NPS-IB is its sole objective:

> *(1) The objective of this National Policy Statement is:*
>
> *(a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and*
>
> *(b) To achieve this:*
>
> *(i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and*
>
> *(ii) by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and*
>
> *(iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and*
>
> *(iv) while providing for the social, economic, and cultural wellbeing of people and communities now and into the future.*

To achieve this objective the NPS-IB contains several policies of relevance to the Project. An assessment of the Project against these policies is detailed below.

Policies 1 and 2

Policy 1 seeks to manage indigenous biodiversity in a way that gives effect to the decision-making principles and takes into account the principles of the Treaty of Waitangi. Policy 2

[143] It is noted that the Resource Management (Freshwater and Other Matters) Amendment Act 2024 inserted a new section into the RMA that suspended certain provisions of the NPS-IB for a 3-year period (Section 78 of the RMA). The suspended provisions relate to the identification of new areas of significant indigenous vegetation and significant habitats of indigenous fauna.

seeks for tangata whenua to exercise kaitiakitanga for indigenous biodiversity in their rohe, including through:

> Managing indigenous biodiversity on their land;

> Identifying and protecting indigenous species, populations and ecosystems that are taonga; and

> Actively participating in other decision-making about indigenous biodiversity.

The principles of the Treaty of Waitangi referred to in Policy 1 are centered around partnership, participation, and protection, which align with the goals of Policy 2.

As mentioned throughout this Application, SLPL has committed to engagement with the Kā Rūnaka. A draft TIA was prepared by Aukaha on behalf of the Kā Rūnaka to address cultural impacts of the Project on Mana whenua interests, values and Treaty rights.

The draft TIA identifies that any proposal that affects the mauri of waterways or ecosystems affects the relationships with kaitiaki, and the mana entrusted to protect them. The draft TIA assists in understanding the effects the proposed development could have on mana whenua and cultural values. SLPL is committed to continuing discussions to ensure that the information provided is used in a way that aligns with Policies 1 and 2 of the NPS-IB.

Policy 3

Policy 3 seeks to adopt a precautionary approach when considering adverse effects on indigenous biodiversity. E3 Scientific (2026a) has applied a precautionary approach in considering adverse effects on biodiversity – including by undertaking extensive lizard surveys to determine the presence of tussock skink within the highly modified grazed pasture onsite. The proposed conditions include extensive measures that will ensure effects on biodiversity are appropriately managed.

Policy 4

Policy 4 of the NPS-IB seeks to manage indigenous biodiversity to promote resilience to the effects of climate change.

There are no specific activities proposed that would incorporate indigenous biodiversity to promote resilience to the effects of climate change. Due to the nature of the Project and the existing environment, engineering approaches are more suitable particularly when focused on the management of stormwater, sediment and erosion controls to avoid any adverse effects on Silver Stream and surrounding properties.

Policy 5

Policy 5 requires that biodiversity be managed in an integrated way, within and across administrative boundaries. The approach to managing biodiversity set out in this Application has been considered in an integrated manner.

Policies 6 and 7

Policy 6 requires significant indigenous vegetation and significant habitats of indigenous fauna to be identified as SNAs, using a consistent approach. Policy 7 seeks to protect SNAs by avoiding or managing adverse effects from new use and development.

The Site does not contain any SNAs mapped in a regional policy statement, regional plan or district plan (or proposed plan). The definition of SNA in the NPS-IB[144] is therefore not met, and this also means that the objectives and policies, where they use those terms, do not apply to the Site.

The Site therefore does not contain an "NPS-IB SNA" and clause 3.10 of the NPS-IB also does not apply given its clear application to 'an SNA'.

However, the Terrestrial Ecology Assessment (E3 Scientific (2026a)) (provided in **Part B)** of this Application) has identified that the Site provides habitat for threatened species – specifically tussock skink- and therefore meets the significance criteria in Appendix 1 of the NPS-IB, which is replicated in the Proposed RPS,[145] and the criteria for significant habitats of indigenous fauna areas in the District Plan[146] in respect of habitat values.

Notwithstanding that the definition of SNA in the NPS-IB is not met, it is clear from the Terrestrial Ecological Assessment (E3 Scientific (2026a)) that the grazed pasture is a habitat for tussock skink and the South Island pied oystercatcher. In addition, the shelterbelt environment, northwest rank grassland, stream edge, stream buffer and curtilage areas also have been assessed as having significant habitat values – due to the areas potentially providing habitat for threatened or at-risk bird species. While not meeting the definition of a SNA in the NPS-IB (because not mapped), the Project has been progressed on the basis of these areas needing to be managed due to their indigenous biodiversity values (including that the policies in the NPS-IB relating to indigenous biodiversity apply).

Clause 3.10 of the NPS-IB sets out how effects on (NPS-IB mapped) SNAs will be managed. The following effects must be avoided, except as provided for in clause 3.11:

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[144] National Policy Statement for Indigenous Biodiversity 2023: Section 1.6 Interpretation.

[145] Proposed Otago Regional Policy Statement 2021 – Appendix 2.

[146] Dunedin City Second Generation District Plan - Policy 2.2.3.2.

- Loss of ecosystem representation and extent;
- Disruption to sequences, mosaics, or ecosystem function;
- Fragmentation of SNAs or the loss of buffers or connections within an SNA;
- A reduction in the function of the SNA as a buffer or connection to other important habitats or ecosystems; and
- A reduction in the population size or occupancy of Threatened or At Risk (declining) species that use an SNA for any part of their life cycle.

Any adverse effects on an (NPS-IB) SNA, that are not set out in the bullets above, must be managed via applying the effects management hierarchy.

While clause 3.10 of the NPS-IB strictly does not apply, E3 Scientific (2026a) provide an assessment of the ecological impact of habitat loss on fauna species, finding that except for tussock skink, the effects will be negligible or low – akin to the 'avoidance' required by the NPS-IB, following the implementation of the following management methods:

- If vegetation greater in one metre in height is to be removed during the main avifauna breeding season, appropriate surveying will occur, with avoidance of any identified nests and / or fledglings to occur;
- Any potential lighting effects will be mitigated by ensuring all lighting, including along the stream edge and buffer is ≤3,000K, with light spill not exceeding 3 lux to minimise ecological disturbance;
- Any loud construction noise will be avoided in close proximity or the stream edge as far as practicable to avoid and / or minimise any adverse effects cause by noise;
- If ongoing monitoring confirms that there are adverse effects on indigenous biodiversity caused by construction and operational vibrations from the SLIP, a matching length / reach of stream located elsewhere in the catchment (to be identified by a suitably qualified and experienced professional) will be enhanced; and
- The retention of the stream buffer and stream edge vegetations.

For the habitat loss for tussock skink, it is noted that the habitat being impacted by the Project is largely exotic / grazed pasture which is clearly not uncommon in the environment. Notwithstanding this, effects are being managed via:

- Salvaging skinks via a variety of methods (to be specified in a Lizard Management Plan that will be prepared as part of a separate application for a Wildlife Act Authority which is not sought in this Application);

- Releasing the skinks at a suitable pre-prepared location that provides suitable habitat. This habitat will be enhanced, and there will be predator control to support with the translocated skinks establishing.

It is therefore considered that the Project is consistent with the requirements of the NPS-IB in respect to the management of significant habitats of indigenous fauna.

Policies 8, 13 and 14

Policy 8 of the NPS-IB seeks to recognise and provide for the importance of maintaining indigenous biodiversity outside of (NPS-IB) SNAs and Policy 13 seeks to promote and provide for the restoration of indigenous biodiversity. Policy 14 promotes increased indigenous vegetation cover in urban and non-urban environments.

Further to Policy 8, the NPS-IB requires that adverse effects on indigenous biodiversity which is not protected by an (NPS-IB) SNA be managed by applying the effects management hierarchy where those effects are significant.

As has been described above in respect of Policies 6 and 7, the Project is proposing a comprehensive range of mitigation measures, following the effects management hierarchy to address effects on indigenous biodiversity.

Policy 10

Policy 10 seeks to recognise and provide for activities that contribute to New Zealand's social, economic, cultural, and environmental wellbeing. The benefits of the Project have been described in detail throughout this Application. These benefits can be realised while protecting indigenous biodiversity through the measures that have been discussed in this Application (and enshrined in the proposed conditions).

Policy 15

Policy 15 seeks to identify and manage areas outside (NPS-IB) SNAs that support specified highly mobile fauna to maintain their populations across their natural range.

The specified highly mobile fauna present, or potentially present, onsite are:

- Tōrea / South Island pied oystercatcher;
- Tarāpukā / black-billed gull;
- Arāpunga / red-billed gull; and
- Karearea / eastern falcon.

As has been described above in respect of Policies 6 and 7, the Project is proposing a comprehensive range of mitigation measures to address effects on indigenous biodiversity – including on specified highly mobile fauna.

Policy 17

Policy 17 seeks to ensure that there are improved information and regular monitoring of indigenous biodiversity. The proposed conditions contain a suite of conditions that require monitoring of biodiversity potentially affected by the Project.

Summary

It is therefore considered that the Project is consistent with the provisions of the NPS-IB.

9.3.7 National Policy Statement for Infrastructure 2025

Overview

The NPS-I came into force on 15 January 2026 and applies to all infrastructure activities and infrastructure supporting activities (except electricity generation and transmission). The term 'infrastructure' includes all infrastructure defined by the RMA, and additional infrastructure defined in the NPS-I. The definition of infrastructure in the RMA includes "*facilities for the loading or unloading of cargo or passengers transported on land by any means*" and "*facilities for the loading or unloading of cargo or passengers carried by sea, including a port related commercial undertaking as defined in section 2(1) of the Port Companies Act 1988.*" The NPS-I therefore applies to the Project.

Objective

The objective of the NPS-I seeks to:

- Ensure the national, regional and local benefits of infrastructure are provided for;
- Enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety;
- Enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations;
- Ensure infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities; and
- Ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.

There are eleven policies which implement this objective. These are assessed below.

Policy 1

Policy 1 requires decision makers to ensure that the national, regional or local benefits of infrastructure, relative to any localised adverse effects on the environment, are recognised and provided for. The policy also sets out what those benefits are, which include:

- Providing for the social, cultural and economic wellbeing of present and future generations;
- Creating, supporting and enhancing well-functioning urban and rural environments;
- Supporting sufficient development capacity to meet demand for housing and business land;
- Providing services that are essential to support human life and the development, growth and functioning of districts, regions, New Zealand and the economy;
- Helping to protect and restore the natural environment;
- Supporting New Zealand's emissions reduction targets and mitigating the effects of climate change; and
- Reducing the risks from, and improving resilience to, natural hazards and climate change.

Decision makers must also recognise the effects on people and environment when infrastructure services are compromised and also must recognise that infrastructure networks can be both independent and interconnected.

Given the benefits of the Project, which have been summarised in Section 6 of this Application the Project is consistent with Policy 1.

Policy 2

Policy 2 sets out that decision makers must recognise that infrastructure may have an operational need or a functional need to be located in a particular environment.

As has previously been described, the location of the Site has substantial locational benefits that should be taken into account by the decision maker, including:

- The Site is identified under the FDS for the purposes of a 'Logistics Park / Freight Hub';
- The Site is located adjacent to the KiwiRail automatically controlled Taieri Branch Rail Line which can be utilised to operate shuttle train services to deliver containerised freight to Port Chalmers;

- The Site topography is flat, large and square enabling establishment of an optimal sized rail siding (capable of accommodating a longer train of 24 x 40 foot wagons) and site layout for operational efficiencies;
- The rural site is directly adjacent to an existing industrial precinct and relatively isolated from nearby sensitive receivers thereby minimising potentially impacted persons;
- The Site is relatively close to Dunedin, remaining accessible to Port Chalmers by road and rail, and accessible to logistics / freight users in the region; and
- The Site is adjacent to the Mosgiel industrial hub, including a Fonterra distribution centre, which is a significant source of containerised freight to Port Chalmers, unlocking opportunities for coordination and increased economies of scale.

For the reasons above, and as evidenced by its identification in the FDS for 'Logistics Park / Freight Hub' purposes, the Site is considered the optimal site in the Dunedin area for an inland port and the Project therefore has an operational need to establish in the area.

Given the above, the Project is consistent with Policy 2.

Policy 3

Policy 3 sets out that decision makers must have regard to infrastructure identified within a strategic planning document and consider relevant spatial plans and master plans prepared by the infrastructure provider and provided to the decision-maker.

As has been described throughout this report, the FDS has identified the Site as being potentially suitable for an inland port, which must be taken into account in accordance with Policy 3.

Policy 4

Policy 4 requires decision makers to enable the efficient and timely delivery of infrastructure activities. [147] Decision makers must also recognise it is the role of the infrastructure provider to identify the preferred location for the infrastructure activity. This Application is seeking to ensure the efficient and timely delivery of the SLIP through the utilisation of the Act.

[147] Infrastructure activities are defined in the NPS-I as *"the construction, operation, maintenance, upgrade and removal of infrastructure and all ancillary infrastructure activities, unless otherwise specified, and include all physical components and assets associated with the infrastructure activity."*

Policy 5

In accordance with Policy 5, decision makers must recognise and provide for the role of infrastructure supporting activities. [148] This Application is seeking to include activities associated with the establishment of an inland port, where they are in scope of the approvals sought in the referral application.

Policy 6

Policy 6 requires decision makers to recognise and provide for Māori interests in relation to infrastructure activities and infrastructure supporting activities.

As mentioned throughout this Application, SLPL has committed to an ongoing relationship with the Kā Rūnaka who have interests in the Project. A draft TIA has been prepared by Aukaha on the Application, and details cultural values, sites and taonga that are significant to Māori. SLPL will continue working with mana whenua to provide outcomes that benefit both the local community and mana whenua.

Policies 7 and 8

Policy 7 addresses how decision makers must assess and manage the effects of proposed infrastructure activities. This policy sets out that decision makers must:

- Have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the selection of the route, site or method of undertaking the work;
- Consider the technical and operational requirements and constraints of infrastructure activities;
- Take into account the extent to which the effects of the infrastructure activities are different in scale, intensity, duration and frequency from the effects of existing infrastructure;
- Take into account relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies to assess and manage adverse effects; and
- Ensure that the mitigation measures and consent conditions are proportionate to the scale of adverse effects generated by the activity.

[148] Infrastructure supporting activities are defined in the NPS-I as *"mean activities that are not ancillary infrastructure activities but that are needed to directly support infrastructure activities, and may include quarrying activities."*

Policy 8 requires decision makers to enable the efficient operation and maintenance and minor upgrade of existing infrastructure, provided that, where practicable, adverse effects are appropriately managed.

This Application has comprehensively addressed the environmental effects of the Project and also provides a suite of comprehensive mitigations (enshrined in proposed conditions) in a manner consistent with this policy.

Policy 9

Policy 9 requires decision makers to enable new infrastructure in all environments, as well as major upgrades of infrastructure activities. Where these activities are proposed to locate in, or are likely to have adverse effects on, environments and values provided for in section 6 of the RMA, the provisions of the NPS-I must be read alongside other relevant national direction (for example the NPS-IB), regional policy statements and regional and district plans. Where new infrastructure is proposed outside of section 6 RMA environments, the adverse effects of new infrastructure (and major upgrades) must be, where practicable, avoided, remediated or mitigated.

As described earlier the Site contains areas of confirmed or potential significant habitat for indigenous fauna – a section 6 RMA matter. In that respect, Policy 9 requires the enabling provisions of the NPS-I to be read alongside any relevant provisions dealing with a significant habitat or indigenous vegetation. The approach to addressing effects on biodiversity values set out earlier in this assessment both enables the Project and also ensures that effects on a section 6 matter are appropriately managed, as anticipated under Policy 9.

Policies 10 and 11

Policy 10 requires decision makers, in respect of planning instruments, to manage the interface between existing and planned infrastructure and other activities.

When assessing and managing the interface between existing and planned infrastructure with other activities, including new or intensified sensitive activities, Policy 11 requires decisions makers to recognise that the effects of infrastructures can be managed, but generally cannot be completely avoided. Decision makers must also recognise that amenity values can change due to a range of factors, and changes in amenity due to infrastructure can be necessary to achieve well-functioning urban and rural environments.

Further, Policy 11 sets out that decision makers should apply the general principle that the primary responsibility for managing adverse effects is on the new activity.

These provisions are applicable to this Project, which is seeking to establish an inland port within a Rural Zone – albeit on the interface of an industrial zone. As will be described later in

this assessment in respect of the Rural Zone provisions of the District Plan, the Project does not entirely align with the directives in respect of avoiding non rural activities and maintaining rural amenity. It is acknowledged that the Project will fundamentally change the amenity of the Site, and the properties immediately surrounding the project area. However, change, in of itself, is not necessarily an adverse effect as confirmed by the NPS-UD and the amenity of the wider area is already impacted by the industrial activities to the west of the Site, the Taieri Aerodrome and the rail corridor.

The Project is not inconsistent with the requirements of Policies 10 and 11 as it will enable the development of regionally and nationally significant infrastructure. The FDS has identified the Site as a potentially suitable location for an inland port, with its proximity to an existing industrial area supporting its suitability.

Summary

It is therefore considered that the Project is consistent with the provisions of the NPS-I.

9.3.8 National Policy Statement for Natural Hazards 2025

Overview

The NPS-NH came into force on 15 January 2026. The NPS-NH provides high level national direction on managing natural hazard risk, and applies to flooding, landslips, active faults and liquefaction.

Decision makers must give effect to the NPS-NH on and from the commencement date. There are flood hazard overlays in the District Plan applicable to the Site and the NPS-NH is a relevant consideration.

Objective

The NPS-NH contains a single objective which seeks that natural hazard risk to people and property associated with subdivision, use and development is managed using a risk-based proportionate approach. There are six policies which implement this objective. These are assessed below.

Policy 1 and Policy 2

Policy 1 requires a risk matrix be used when considering natural hazard risk, while Policy 2 requires natural hazard risk be managed using an approach that is proportionate to that risk. The approach to manage the flood hazard risk at the Site, described in the Stormwater Assessment (Stantec (2026d)), is aligned with these requirements. It is noted that the

District Plan has utilised a risk matrix in determining the sites subject to natural hazards through the mapped overlays – albeit different to that in the NPS-NH.

Policies 3 and 4

Policies 3 and 4 provide the framework for managing natural hazard risk. Policy 3 is directive, requiring that where subdivision, use or development is assessed as having a very high risk, that risk must be avoided. Policy 4 sets out that where subdivision, use or development (including mitigation measures) will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.

As has previously been described in this Application, the Site is within the Hazard 1 (flood) Overlay Zone, and the Hazard 2 (flood) Overlay Zone. Table 11.1.4A of the District Plan sets out that the risk is 'High' in Hazard 1 (Flood) Overlay Zone, and 'Moderate' in the Hazard 2 (Flood) Overlay Zone. These hazard constraints have shaped the integrated stormwater strategy, which is designed to ensure that external catchment flows do not undermine the safety, operability, or environmental performance of the SLIP.

To manage hazards associated with flooding, the Project incorporates a network of diversion channels positioned around the Site's northern, eastern, and western boundaries to intercept and redirect Mill Stream overflow and local runoff. During more extreme events such as the 2% AEP climate adjusted storm, diversion capacity is intentionally exceeded in a controlled manner, allowing some floodwater to enter the Site beneath the planned northern noise wall / acoustic barrier. This water is then temporarily stored in onsite shallow ponding areas and within the proposed stormwater attenuation pond. This approach avoids increasing flood levels upstream or downstream of the Site, with hydraulic model outputs showing a 0.01 m reduction in peak water levels at the Silver Stream Gordon Road gauge during the 1% AEP climate adjusted event. This confirms the proposed strategy will result in neutral or slightly beneficial downstream flood outcomes.

Given the approach to managing flood events set out above, it is considered that the Project will not result in a very high risk which must be avoided in accordance with Policy 3 of the NPS-NH, and the risk is being appropriately mitigated in accordance with Policy 4.

Policy 5

Policy 5 addresses the information requirements for making decisions on natural hazards, setting out that natural hazard risk assessments and decisions must be based on the best available information. The assessments and decisions must be made even when the information being relied upon is uncertain or incomplete.

As described in relation to Policies 4 and 5, Stantec (2026d) has undertaken hydraulic modelling using the best available information to understand the effects of the Project in respect of flooding – consistent with the requirements of Policy 5.

Policy 6

Policy 6 requires that the potential impacts of climate change, to at least 100 years into the future, must be considered. Stantec(2026d) has used climate adjusted rainfall modelling which accounts for future climate variability, consistent with this policy.

Summary

It is therefore considered that the Project is consistent with the provisions of the NPS-NH.

9.3.9 Proposed Otago Regional Policy Statement

Overview

The Proposed RPS was notified on 26 June 2021, and the decisions on the Proposed RPS were released in March 2024.

All High Court appeals relating to the freshwater part of the Proposed RPS have been resolved. Mediation of appeals to the Environment Court for the non-freshwater parts of the Proposed RPS has occurred, resulting in multiple consent orders being issued by the Environment Court. Only one topic, urban form and development, has not yet been fully resolved. While settled through a mediated outcome, the consent order has not yet been issued, and the provisions relating to urban development are the only provisions still subject to appeal.

This assessment is based on the appeals version of the Proposed RPS that was updated in December 2025. It is understood that version captures all consent orders issued by the High Court and Environment Court.

The Proposed RPS provides a vision and broad policy framework for all resource management in Otago. Regional plans and district plans as they develop over the next 10 years and beyond, are required to give effect to the Proposed RPS (once the provisions are fully operative).

Mana Whenua

Objective MW-O1 seeks that the principles of Te Tiriti o Waitangi are given effect to in resource management processes and decisions. Policy MW-P1 requires the promotion of awareness and understanding of the obligations of local authorities in regard to the principles of Te Tiriti o Waitangi, tikaka Māori and kaupapa Māori. Policy MW-P2 follows a

similar theme, requiring local authorities exercise their functions and powers in accordance with the principles of Te Tiriti o Waitangi, including by recognising the status of Kāi Tahu and facilitating Kāi Tahu involvement in decision making and recognising and providing for Kāi Tahu values.

Policy MW-P3 seeks that the natural environment be managed to support Kāi Tahu hauora, including by recognising that Kāi Tahu hold an ancestral and enduring relationship with all whenua and wai māori within their takiwā.

Although the objective and policies are tailored towards local authorities, SLPL is committed to working in partnership with mana whenua. SLPL has hosted onsite meetings, presentations and have commissioned a TIA which is being prepared by Aukaha on the behalf of the Kā Rūnaka for the Project. Understanding any actual or potential effects on cultural values has been a major part of this process, and SLPL will continue working with the Kā Rūnaka to avoid and mitigate any effects on these values.

Integrated Management

This section of the Proposed RPS contains four objectives. These objectives seek the following:

- The management of natural and physical resources, by and for the people of Otago, in partnership with Kāi Tahu, achieves a healthy and resilient natural environment, including the ecosystem services it provides and supports the well-being of present and future generations; [149]
- The management of natural and physical resources embraces ki uta ki tai; [150]
- Otago's communities provide for their social, economic, and cultural well-being by using, developing or protecting natural and physical resources in ways that support the life-supporting capacity of the environment for future generations; and [151]
- Otago's communities, including Kāi Tahu, understand what climate change means for their future, and responses to climate change in the region. [152]

These objectives are supported by several policies. Policy IM-P3 requires the recognition and provision for the relationship of Kāi Tahu with natural resources, including by the

[149] Proposed RPS Objective IM-O1.
[150] Proposed RPS Objective IM-O2.
[151] Proposed RPS Objective IM-O3.
[152] Proposed RPS Objective IM-O4.

facilitation of participation of mana whenua in resource management processes and decision making.

A full description of consultation undertaken with mana whenua is outlined in Section 5 of this Application. Mana whenua participation in the Project, includes the preparation of a TIA, advice and input in draft technical reports and an ongoing relationship as the Project progresses.

Policy IM-P4 sets out that regional and district plans are to achieve healthy and resilient ecosystems, and IM-P5 requires that use and development be managed in a way that recognises the interconnected nature of natural and physical resources. The approach taken in this Application recognises the interconnected nature of natural and physical resources.

The management of uncertainties in resource management decision making is the focus of Policy IM-P6. This policy sets out that uncertainties are to be managed by using the best information available at the time, including scientific data and mātauraka Māori. All practicable steps are to be taken to reduce uncertainty and adopting a precautionary approach towards activities whose effects are uncertain, unknown or little understood but potentially significantly adverse, which may include the use of adapting management where appropriate. As demonstrated throughout this Application, the best available information has been utilised to address the effects of the Project – which are well understood and able to be managed on an ongoing basis.

Policies IM-P7 and IM-P8 address the management of cross boundary issues and the effects of climate change, respectively. Similarly, Policy IM-10 requires the identification and implementation of climate change adaption and climate change mitigation methods for Otago. Pertinently, clause (2) requires the management of the establishment of new activities in areas subject to natural hazard risk from the effects of climate change. Policy IM-P12 provides a framework for activities that have climate change mitigation or climate change adaptation benefits. As described in relation to the NPS-NH, the flooding risk to the Site is well known and understood, and the potential effects of climate change have been considered throughout the preparation of this Application.

The balance of the provisions in this section of the Proposed RPS require:

> Resource management decisions to recognise and manage the impact of cumulative effects on the environment, and the opportunities available for future generations; [153]

[153] Proposed RPS Policy IM-P13.

- Regional and district plans to include provisions that sustain the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations and safeguard the life supporting capacity of the natural environment; and [154]
- Regional and district plans to recognise and provide for the role and use of natural and physical resources in a way or at a rate that supports the social, cultural and economic well-being of Otago's communities now and in the future.[155]

While these provisions are aimed at decision makers, it is noted that this application is consistent with these broad directives.

Air

Objective AIR-O1 seeks that ambient air quality provides for the health and wellbeing of the people of Otago, amenity values, and the life supporting capacity of ecosystems. Objective AIR-O2 seeks the localised adverse effects of discharges to air do not compromise human health, amenity values, mana whenua values and the life supporting capacity of ecosystems.

The policies implementing this objective require:

- The maintenance of ambient air quality; [156]
- Where air quality is degraded, the improvement of ambient air quality; [157]
- Provide for discharges to air that do not adversely affect human health, amenity vales, mana whenua values and the life supporting capacity of ecosystems; [158]
- The management of adverse effects of discharges to the air, including by avoiding noxious or dangerous effects, managing discharges to air so they do not cause offensive or objectionable effects; and [159]
- Discharges to air not adversely affect mana whenua values. [160]

The only discharges to air associated with the activities being authorised as part of this Application are those associated with construction activities – namely dust. However, the

[154] Proposed RPS Policy IM-P14.
[155] Proposed RPS Policy IM-P15.
[156] Proposed RPS Policy AIR-P1.
[157] Proposed RPS Policy AIR-P2.
[158] Proposed RPS Policy AIR-P3.
[159] Proposed RPS Policy AIR-P4.
[160] Proposed RPS Policy AIR-P6.

potential for dust generation during construction activities can be managed through standard erosion and sediment controls set out in the proposed condition set.

Land and Freshwater

Freshwater

Objective LF-WAI-O1 seeks that waterbodies and their health and well-being are protected, restored or improved where they are degraded, so that the mauri of those waterbodies is protected. Policy LF-WAI-P1 requires decision making affecting fresh water in Otago to prioritise:

> First, the health and wellbeing of waterbodies and freshwater ecosystems;

> Second, the health and needs of people interacting with water; and

> Third, the ability of people and communities to provide for their social, economic and cultural well-being, now and in the future.

As has previously been described in relation to the provisions of the NPS-FM that sets out this hierarchy of priorities, E3 Scientific (2026b) has confirmed that the Project will result in a low / less than minor effect on the water quality and ecology of Silver Stream.

Policy LF-WAI-P2 requires the recognition to Kāi Tahu rakatirataka in respect of freshwater. This policy also requires rakatirataka be given practical effect to, including by facilitating partnership with mana whenua in respect of freshwater decision-making processes. Policy LF-WAI-P4 requires all decision makers give effect to Te Mana o te Wai. Policy LF-WAI-P3 requires that the management and use of freshwater and land be undertaken in an integrated approach that is consistent with tikaka and kawa. In accordance with this policy, the effects of the use and development of land is to be managed to maintain or enhance the health and wellbeing of freshwater and associated ecosystems.

The draft TIA states that the Kā Rūnaka wishes to engage in a constructive relationship with SLPL that furthers their recognition of their rights, responsibilities and obligations to te taiao including for matters related to freshwater. This partnership has extended to the review of technical engineering reports, including the Stormwater Assessment and the Freshwater Ecology Assessment. SLPL recognise the importance of constructive mana whenua engagement, and these relationships will continue to be built upon.

Objective LF-FW-O1A provides a framework for achieving the visions set for each FMU and rohe in the region, including:

- Waterbodies support healthy populations of indigenous species and Mahika kai that are safe for consumption;
- The interconnectedness of land, freshwater and coastal water is recognised;
- Fish passage is provided for;
- The form, function and character of water bodies reflects their natural characteristics and natural behaviours to the extent reasonably practicable;
- The relationship of Kāi Tahu is sustained;
- The health of the water supports the health of people and their connections with water bodies;
- Sustainable land and water management practices are provided for; and
- Freshwater is managed as part of New Zealand's response to climate change.

In respect to these matters:

- The Freshwater Ecological Assessment (E3 Scientific (2026b)) confirms that Silver Stream has high ecological values, and the effects of the Project on those values – including on indigenous species - will be low;
- The only works proposed on the margin of Silver Stream are the construction of stormwater spillway structures and potential slope stabilisation measures which will not impact the natural character of the stream, given its modified nature and the small-scale nature of the structure; and
- The impacts of climate change have been considered throughout the technical assessments supporting the Application.

Objective LF-VM-O4 is specific to the Taiari FMU, providing the overarching vision for this FMU. This objective seeks that, by 2050, in addition to the matters in LF-FW-O1A (discussed above), this FMU achieves the following outcomes:

- The upper and lower wetland complexes are protected, restored or enhanced; and
- The gravel bed of the lower Taiari is restored and sedimentation of the Waipōuri/Waihola wetland complex is reduced.

Following on from these objectives, Policy LF-VM-P5 sets out the framework for managing freshwater through FMUs, and Policy LF-VM-P6 sets out the relationship between FMUs and rohe, where they have been defined within FMUs (noting that there are no defined rohe within the Taiari FMU. Policy LF-FW-P6A recognises that it will take time to achieve the long-

term visions set out in the Proposed RPS. Based on the conclusions of E3 Scientific (2026b), the Project will not affect the achievement of these outcomes and will contribute to achieving these outcomes with regard to Silver Stream.

Objective LF-FW-O10 seeks that the natural character of wetlands, lakes and rivers (and their margins) is preserved and protected from inappropriate use and development. Policy LF-FW-P13 requires the preservation of the natural character and instream values of lakes and rivers, and the natural character of their beds and margins. The requirements of this policy are considered in respect of Policy 7 of the NPS-FM (assessed earlier in this section). This policy also requires:

> Sustaining the form and function of a water body that reflects its natural behaviours;

> Controlling the use of water and land that would adversely affect the natural character of the water body; and

> The maintenance or enhancement of the values of riparian margins to support habitat and biodiversity, reduce contaminant loss to water bodies and support natural flow behaviour.

Where required, actions are to be promoted that restore natural character or instream values of lakes and rivers, or the natural character of their margins, including by:[161]

> Restoring a form and function that reflect the natural behaviours of the water body;

> Improving water quality or quantity where it is degraded;

> Increasing the presence, resilience and abundance of indigenous flora and fauna, including by providing for fish passage within river systems, and where necessary and appropriate, creating fish barriers to prevent incursions from undesirable species;

> Improving water body margins by naturalising bank contours and establishing indigenous vegetation and habitat; and

> Restoring natural connectivity between and within water systems.

As described earlier in this Application, the Project will not materially affect the character or ecology of Silver Stream given the imposition of the proposed conditions (with the potential for character enhancement as a result of proposed natural character enhancement measures).

[161] Proposed RPS Policy LF-FW-P14.

Policy LF-FW-P7 sets out that environmental outcomes, attribute states, environmental flows, levels and limits are to ensure that:

- The health and well-being of water bodies and freshwater ecosystems is maintained or, if degraded, improved;
- The habitats of indigenous species with life stages dependent on water bodies are protected and sustained,
- The habitats of trout and salmon are protected;
- Fish passage is provided for;
- Specified rivers and lakes are suitable for primary contact within the following timeframes:
  - by 2030, 90% of rivers and 98% of lakes, and
  - by 2040, 95% of rivers and 100% of lakes, and
- Resources harvested from water bodies including mahika kai and drinking water are safe for human consumption.

Based on the conclusions in the Freshwater Ecology Assessment prepared by E3 Scientific (2026b), the Project will not affect the achievement of these outcomes.

In respect to stormwater, adverse effects of direct and indirect discharges of stormwater to freshwater are to be minimised in accordance with Policy LF-FW-P15 by:

- Requiring integrated catchment management plans for management of stormwater in urban areas;
- Requiring all stormwater to be discharged into a reticulated system, where one is made available by the operator of the reticulated system, unless alternative treatment and disposal methods will result in the same or improved outcomes for fresh water;
- Requiring implementation of methods to progressively reduce unintentional stormwater inflows to wastewater systems;
- Requiring that any stormwater discharges do not prevent water bodies from meeting any applicable water quality standards set for FMUs and/or rohe;
- Requiring the use of water sensitive design techniques wherever practicable;
- Promoting the reticulation of stormwater in urban areas where appropriate; and
- Promoting source control as a method for reducing contaminants in discharges and the use of good practice guidelines for managing stormwater.

The Stormwater Assessment prepared by Stantec (2026d) sets out how the stormwater associated with the Project will be managed, which is consistent with these policy requirements. The stormwater system includes the ability to manage flooding events, and includes source control, treatment devices and natural policing processes to minimise effects on Silver Stream (and the wider environment in respect of flooding).

Policy LF-FW-P16 requires all discharges containing sewage or industrial and trade waste be discharged into a reticulated wastewater system, as well as promoting source control as a method for reducing contaminants in discharges. As is described earlier in this Application, in Section 2, wastewater is proposed to be discharged into the DCC system.

Land and Soil

There are three objectives in the Proposed RPS. These objectives seek:

> The availability and productive capacity of HPL for primary production is protected from inappropriate use and development now and for future generations; [162]

> The use, development and protection of land and soil safeguards the life supporting capacity soil, contributes to achieving environmental outcomes for freshwater and recognises the role of these resources in providing for the social, economic and cultural wellbeing of Otago's people and communities; and [163]

> Use and development in rural areas occurs in a way that provides for the ongoing use of rural areas for primary production and rural industry and does not compromise the long-term viability of primary production and rural communities. [164]

Policies LF-LS-P16, LF-LS-P17 and LF-LS-P18 all address soil. These policies require:

> The maintenance of soil quality by managing both land and freshwater resources, including the interconnections between soil health, vegetative cover and water quality and quantity;

> The maintenance of the health and productive potential of soils, to the extent reasonably practicable, by managing the use and development of land in a way suited to soil characteristics; and

> The minimisation of soil erosion, and associated risk of sedimentation in waterbodies, resulting from land use activities.

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[162] Proposed RPS Objective LF-LS-O11.

[163] Proposed RPS Objective LF-LS-O12.

[164] Proposed RPS Objective UFD-O4.

In addition, Policy LF-LS-P19 requires the maintenance of the availability and productive capacity of HPL.

As is described in respect of the NPS-HPL, there are permanent long-term constraints on the Site that impact the viability of land based primary production. That assessment is equally applicable to the provisions in the Proposed RPS relating to the management of HPL / soils.

Policy LF-LS-P16A requires the reduction in impacts of pests, including wilding conifers. The Project will not introduce any pest species. In respect of biosecurity risks, Port Otago already has a comprehensive management framework at its existing operations that addresses biosecurity risks which will equally apply to the SLIP.

Policy LF-LS-P20 addresses land use change, requiring the promotion in land use of land management that support and improve:

> The sustainability and efficiency of water use;

> Resilience to the impacts of climate change;

> The health and quality of soil; or

> Water quality.

Similarly, Policy UFD-P7 sets out the management framework for the use and development in rural areas, requiring that use and development:

> Maintain rural areas as places where people live, work and recreate and where a range of activities and services are required to support these rural functions, and provide for social and economic wellbeing within rural communities and the wider region;

> Prioritises land-based primary production on HPL in accordance with the NPS-HPL, except if it provides for primary production, rural industry, and supporting activities, and recognises the importance of these activities to the social and economic wellbeing of Otago's communities; and

> Restricts the establishment of non-rural activities which could adversely affect, including by way of reverse sensitivity or fragmentation, the productive capacity of HPL, or existing or anticipated primary production and rural industry activities, except as provided for in (5) or the NPS-HPL.

As will be discussed later in this section, there is tension between this Project and the directives in the District Plan and the Proposed RPS that require the maintenance of rural areas and avoiding land use change. However, there are clear locational benefits to locating an inland port in this location, and also constraints on the land that impact the profits

associated with farming activities, that have been discussed throughout this section (in respect of the NPS-HPL and NPS-I). Again, the FDS clearly signals this location as being appropriate (subject to further investigations that have been undertaken in support of this Application) for an inland port.

The health and wellbeing of water bodies and freshwater ecosystems is the focus of Policy LF-LS-P21. This policy requires the maintenance (or improvement) in waterbodies and freshwater ecosystems to meet environmental outcomes set for FMUs by:

> Reducing or otherwise managing the adverse effects of direct and indirect discharges of contaminants to water from the use and development of land;

> Managing land uses that may have adverse effects on the flow of water in surface water bodies or the recharge of groundwater;

> Recognising the drylands nature of some of Otago and the resulting low water availability; and

> Maintaining or, where degraded, enhancing the values of riparian margins.

All of these matters have been addressed earlier in this assessment in respect of the water quality provisions of the Proposed RPS and the NPS-FM.

Policy LF-LS-P22 sets out how public access to and along lakes and rivers should be provided. The Project will not alter the existing level of public access along the walking track on the southern bank of Silver Stream in accordance with this policy, however new public access along the northern bank of Silver Stream is not proposed to avoid further disturbance of the stream environment and to maintain a level of security consistent with the operational requirements of an inland port.

Ecosystems and Indigenous Biodiversity

There are four objectives in the Proposed RPS in respect to ecosystems and indigenous biodiversity. The objectives seek to ensure that Otago's indigenous biodiversity is healthy, and the decline in condition and quantity is halted, [165] that restoration and enhancement activities result in an improvement in biodiversity, [166] that Kāi Tahu exercise their rakatirataka and role as kaitiaki of Otago's indigenous biodiversity [167] and that these objectives are to be

[165] Proposed RPS Objective ECO-O1.
[166] Proposed RPS Objective ECO-O2.
[167] Proposed RPS Objective ECO-O3.

achieved while providing for the social, cultural and economic wellbeing of people and communities.[168]

Policy ECO-P7 sets out that the provisions of this section of the Proposed RPS applies to all forms of indigenous biodiversity except that:

> Policy ECO-P2 only applies to land covered by water, water bodies, or freshwater ecosystems that are not within a natural inland wetland if those areas are contained within a wider significant natural area identified in accordance with ECO-M2. Silver Stream is not identified as a significant natural area and therefore this policy is not relevant to freshwater indigenous biodiversity of Silver Stream; and

> Policies ECO-P3, ECO-P4, ECO-P5A, ECO-P6, and ECO-P13 do not apply to land covered by water, water bodies, or freshwater ecosystems and therefore these policies are not relevant to freshwater indigenous biodiversity of Silver Stream.

Policy ECO-P1 implements Objective ECO-O3 which sets how Kāi Tahu's role as kaitiaki of Otago's biodiversity will be enabled, including by:

> Partnering with Kāi Tahu in the management of indigenous biodiversity to the extent desired by mana whenua;

> Working with Kāi Tahu to identify indigenous species and ecosystems that are taoka;

> Incorporating the use of mātauraka Māori in the management and monitoring of indigenous biodiversity; and

> Facilitating access to and use of indigenous biodiversity by Kāi Tahu, including mahika kai, according to tikaka.

As mentioned throughout this Application, engagement with the Kā Rūnaka has been occurring throughout the different stages of the Project, and a draft TIA has been prepared. The draft TIA states that any proposal that affects the mauri of waterways or ecosystems affects the relationships with kaitiaki, and the mana entrusted to protect them. The draft TIA provides significant value to understanding the effects development could have on mana whenua and cultural values (inclusive of ecosystems). SLPL is committed to continuing discussions to ensure that the information provided is used in a constructive way, and to implement measures to address environmental effects that align with these policies.

[168] Proposed RPS Objective ECO-O4.

The Site does not contain any SNAs mapped in a regional policy statement, regional plan or district plan (or proposed plan) and therefore does not meet the definition of an SNA under the Proposed RPS.[169]

Policy ECO-P2 (which does not apply to the freshwater indigenous biodiversity of Silver Stream as set out above) sets out that SNAs are to be identified and mapped in accordance with Method ECO-M2.

Method ECO-M2, sets out that until SNAs are identified and mapped, local authorities must require ecological assessments to be provided with applications for resource consent that identify whether affected areas are SNAs in accordance with APP2.

In their Terrestrial Ecology Assessment, E3 Scientific (2026a) has assessed the Site against APP2, and has identified that it meets the significance criteria in respect of habitat values for indigenous species and therefore constitutes significant habitat.

However, as identified above, there are no SNA's on the Site according to the definition of the Proposed RPS however as the Site has been identified as containing significant habitat, the provisions of the Proposed RPS relating to SNAs have been assessed for completeness below.

Policy ECO-P3 sets out how SNAs are to be protected, including by first avoiding the following adverse effects:

> Loss of ecosystem representation and extent;

> Disruption to sequences, mosaics, or ecosystem function;

> Fragmentation of significant natural areas or the loss of buffers or connections within an SNA;

> A reduction in the function of the significant natural area as a buffer or connection to other important habitats or ecosystems; or

> A reduction in the population size or occupancy of Threatened or At Risk (declining) species that use a significant natural area for any part of their life cycle.

Policy ECO-P3 then seeks to protect indigenous species and ecosystems that are taoka by first avoiding adverse effects that result in any loss of taoka values identified by mana whenua. The effects management hierarchy is to then be applied to activities impacting indigenous biodiversity.

[169] Proposed Otago Regional Policy Statement June 2021 – Definitions.

Policy ECO-P4 sets out that the maintenance of biodiversity is to be achieved by following the sequential steps in the effects management hierarchy for specified activities in SNAs, or where they may adversely affect indigenous species and ecosystems that are taoka (but are not highly mobile fauna) that have been identified by mana whenua as requiring protection. This policy applies to new use or development for the purpose of the construction or upgrade of specified infrastructure[170] that provides significant national or regional public benefit that has a functional need or operational need to locate within the relevant significant natural area(s) or where they may adversely affect indigenous species or ecosystems that are taoka, and there are no practicable alternative locations.

Outside of identified SNAs, indigenous biodiversity is to be managed by all of the following:

> Applying the effects management hierarchy (in relation to indigenous biodiversity) to manage significant adverse effects on indigenous biodiversity and recognising and providing for the protection of significant indigenous biodiversity values identified under ECO-M2(4);

> Requiring the maintenance of indigenous biodiversity for all other adverse effects of any activity, and

> When significant indigenous biodiversity values are identified under ECO-M2(4), protecting those values in district plans.

As has been described in respect of the NPS-IB, the Project will impact habitat for indigenous species – noting that most of the habitat impacted is grazed exotic pasture. Notwithstanding this, the proposed conditions include a suite of measures that will manage effects on indigenous species.

Policy ECO-P8 addresses the restoration and enhancement of indigenous biodiversity, seeking that the extent, occupancy and condition of Otago's indigenous biodiversity is increased, including by restoring and enhancing habitat for indigenous species and improving the health and resilience of indigenous biodiversity including ecosystem and species. Given the conclusions of E3 Scientific (2026a), the Project will not impact the overall values of Otago's indigenous biodiversity.

Policy ECO-P10 seeks to manage indigenous biodiversity and the effects on it from development in an integrated way, including by recognising the interactions between the terrestrial environment and freshwater. The Project has addressed the effects of the

[170] The definition of specified infrastructure in the Proposed RPS is the same as in the NPS-IB.

activities involved in an integrated manner – demonstrated by the comprehensive mitigations proposed that address freshwater, terrestrial and landscape related effects.

Climate change is the focus on Policy ECO-P11, setting out that the resilience of indigenous biodiversity to climate change is to be promoted, including by maintaining and promoting the enhancement of the connectivity between ecosystems, and between existing and potential habitats, to enable migrations so that species can continue to find viable niches as the climate changes.

There are no specific activities proposed that fit the description of nature-based solutions or alternative methods that set out to ensure resilience to climate change. Due to the nature of the Project and the existing environment, engineering approaches are more suitable particularly when focused on the management of stormwater, sediment and erosion controls to avoid any adverse effects on Silver Stream and surrounding properties. It is proposed that planting and natural character enhancement is undertaken on the bank of Silver Stream which will naturally enhance and support habitats and ecosystems, will inherently providing low levels of support for climate change effects.

Energy, Infrastructure and Transport

Infrastructure

As has previously been described, the Project fits within the ambit of the definition of 'infrastructure' in the RMA (which is also applicable to the Proposed RPS). Similarly, the RPS definition of 'nationally significant infrastructure' includes port facilities of listed port companies – although this definition does not specifically include this inland port.

This section of the Proposed RPS contains four objectives, the most relevant to the Project seek:

> Effective, efficient, safe and resilient infrastructure enables the people and communities to provide for their social and cultural well- being, their health and safety, and supports sustainable economic development and growth in the region, while adverse effects are managed; [171]

> Development of infrastructure and land use change is coordinated where appropriate; and [172]

[171] Proposed RPS Objective EIT-INF-O4.

[172] Proposed RPS Objective EIT-INF-O5.

- Regionally significant and nationally significant infrastructure are not compromised by subdivision, use and development. [173]

The policies that implement these objectives require:

- The recognition and provision of electricity distribution infrastructure; [174]
- Decision making on the allocation or use of natural and physical resources must take into account the functional needs and operational needs of nationally significant infrastructure and regionally significant infrastructure; and[175]
- Provide for upgrades to existing, and development of new, nationally significant infrastructure or regionally significant infrastructure while ensuring that it is designed to maintain functionality during and after natural hazard events, is resilient to potential climate change effects, is coordinated with land use planning and its delivery, operation or use is efficient. [176]

In respect to these policy directives:

- The operational needs of the Project, and suitability of the Site, have been discussed in respect of the NPS-I;
- The effects of the Project are comprehensively addressed in Section 6 of this Application, and the supporting technical assessments; and
- Flooding related hazards, which includes factoring in climate change projections, is addressed in the Stormwater Assessment, and in respect of the NPS-NH.

Policy EIT-INF-P13 is applicable to locating and managing the effects of infrastructure, nationally significant infrastructure and regionally significant infrastructure. This policy sets out that when providing for new infrastructure:

- Avoid, as a first priority, locating infrastructure in significant natural areas and natural inland wetlands and rivers (among other areas not applicable to the Project);
- If it is not reasonably practicable to avoid locating in the above listed areas, because of the functional or operational needs of the infrastructure, manage the effects as follows:
    - For nationally significant infrastructure or regionally significant infrastructure:

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[173] Proposed RPS Objective EIT-INF-OX and Policy EIT-INF-P15.

[174] Proposed RPS Policy EIT-INF-P9A.

[175] Proposed RPS Policy EIT-INF-P10.

[176] Proposed RPS Policy EIT-INF-P12.

- Manage effects on significant natural areas in accordance with Policies ECO-P3, ECO-P4 and ECO-P5A;
- Manage effects on natural inland wetlands or rivers in accordance with Policies LF-FW-P10A and LF-FW-P13; and

- For all for all infrastructure that is not nationally significant infrastructure, or regionally significant infrastructure avoid adverse effects on the values that contribute to the area's outstanding nature or significance.

In respect to these matters, the Project is not located in an identified SNA that is mapped in a regional or district plan. However, the Site does contain significant habitat values due to the presence of threatened and at-risk indigenous species. E3 Scientific (2026a) confirms that the effects on the Project can be appropriately managed through the measures already described in this Application, and as proposed in the conditions, in a manner consistent with these policy directives.

When considering proposals to develop or upgrade infrastructure, Policy EIT-INF-P14 sets out that decision makers must:

- Require consideration of alternative sites, methods and designs if adverse effects are potentially significant or irreversible; and
- Require consideration of the current and future effects of climate change.

In respect to these matters:

- The adverse effects of the Project will not be significant such that consideration of alternative sites, methods and designs is required;
- The proposed mitigation measures addressing the effects of the Project will ensure that the adverse effects are not significant; and
- The current and future effects of climate change have been considered where appropriate – for example, in relation to stormwater management.

Finally, Policy EIT-INF-P17 requires that development of infrastructure and additional infrastructure required to service existing, planned and expected urban growth demands in the short, medium and long term is provided for. The infrastructure assessments supporting this Application have confirmed that the Project can be serviced appropriately from an infrastructure perspective.

Transport

The transport related provisions of the Proposed RPS, seek the following:

- There is an integrated air, land and water based transport network;[177]
- The transport system supports the movement of people, goods and services and is integrated with land use; [178]
- The contribution of transport to greenhouse gas emissions is reduced, and communities are less reliant on fossil fuels for transportation; and[179]
- Commercial port activities[180] operate safely and efficiently.[181]

Policy EIT-TRAN-P21 sets out that the efficient and effective operation of the transport system is maintained by:

- Avoiding or mitigating adverse effects of activities on the functioning of the transport system;
- Avoiding the impacts of incompatible activities, to the extent reasonably practicable, including those that may result in reverse sensitivity effects;
- Avoiding or minimising the effects of activities and development so that the opportunity to adapt, upgrade or develop the transport system to meet future transport demand, is not compromised;
- Promoting the development and use of transport hubs that enable an efficient transfer of goods for transport and distribution across different freight and people transport modes;
- Promoting methods that provide more efficient use of, or reduce reliance on, private motor vehicles, including ridesharing, park and ride facilities, bus hubs, bicycle facilities, demand management and alternative transport modes; and
- Encouraging a shift to using renewable energy sources.

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177 Proposed RPS Objective EIT-TRAN-O7 and Policy EIT-TRAN-P18.

178 Proposed RPS Objective EIT-TRAN-O8 and Policy EIT-TRAN-P19.

179 Proposed RPS Objective EIT-TRAN-O9 and Policies EIT-TRAN-P20 and EIT-TRAN-P22.

180 The definition of commercial port activities in the Proposed RPS is not applicable to this Project as that definition applies to "*activities carried out to service commercial ship operators calling at Port Chalmers and Dunedin (including the wharves at Ravensbourne and Careys Bay)...*"

181 Proposed RPS Objective EIT-TRAN-O10.

Stantec (2026c) concludes in their ITA that the Project will contribute to wide area benefits and efficiencies to the transport network by reducing the need for freight to be transported by road to or from Port Chalmers as a result of the SLIP's direct connection to the railway network. While there will be some increases in truck movements on SH87 as the Site develops, this increase represents around 1% of the existing traffic volume.

Hazards and Risks

Natural Hazards

Objective HAZ-NH-O1 seeks that activities do not exacerbate natural hazard risk and are managed to reduce significant natural hazard risk. Objective HAZ-NH-O2 seeks that people, communities, property and other aspects of the environment are prepared for and able to adapt to the effects of natural hazards, including natural hazard risk that are exacerbated by climate change.

The policies that implement these objectives require:

- The identification of areas subject to natural hazards, using the best available information; [182]
- Within areas that are subject to natural hazards, assess the natural hazard risk as significant, tolerable or acceptable by determining a range of natural hazard event scenarios and their potential consequences; [183]
- The management of new activities within areas subject to natural hazards by achieving the following outcomes: [184]
    - Significant natural hazard risks are avoided;
    - When the natural hazard risk is tolerable, manage the level of risk so that it does not exceed tolerable; and
    - When the natural hazard risk is acceptable, maintain the level of risk.
- Managing existing activities within area of natural hazard risk; [185]
- Using a precautionary approach where the natural hazard risk, either individually or cumulatively, is uncertain or unknown, but potentially significant or irreversible; [186]

[182] Proposed RPS Policy HAZ-NH-P1.
[183] Proposed RPS Policy HAZ-NH-P2.
[184] Proposed RPS Policy HAZ-NH-P3.
[185] Proposed RPS Policy HAZ-NH-P4.
[186] Proposed RPS Policy HAZ-NH-P5.

- Protecting features and systems that provide hazard mitigation; [187]
- Prioritise risk management approaches that reduce the need for hard protection structures; [188]
- Locate and design lifeline utilities and facilities for essential / emergency services to maintain their ability to function during and after natural hazard events; [189]
- Protect hazard mitigation measures, lifeline utilities and essential / emergency services; and[190]
- Involve Kāi Tahu in decision making on the management of natural hazard risk affecting the values of wāhi tupuna.

The analysis of the NPS-NH provisions is equally applicable to the natural hazard provisions of the Proposed RPS. In summary, the District Plan identifies the Site as being subject to flooding hazards and the Stormwater Assessment (Stantec (2026d)) sets out how flood risks are to be appropriately managed within the Site. The effects of the Project in relation to natural hazards are comprehensively addressed in Section 6 of this Application.

Contaminated Land

The sole objective of this section of the Proposed RPS seeks that contaminated land and waste materials are managed to protect human health and do not harm Kāi Tahu values and the environment in Otago. [191] The policies require:

- The identification of sites known or potentially contaminated; [192]
- Avoiding the creation of new contaminated land; and[193]
- The application of the principles of the waste management hierarchy.[194]

Policy HAZ-CL-P14 sets out how contaminated land is to be managed, including by:

- Assessing and, if required, monitoring contaminant levels and environmental risks,
- Protecting human health in accordance with regulatory requirements;

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[187] Proposed RPS Policy HAZ-NH-P6.
[188] Proposed RPS Policy HAZ-NH-P7.
[189] Proposed RPS Policy HAZ-NH-P8.
[190] Proposed RPS Policy HAZ-NH-P9.
[191] Proposed RPS Objective HAZ-CL-O3.
[192] Proposed RPS Policy HAZ-CL-P13.
[193] Proposed RPS Policy HAZ-CL-P15.
[194] Proposed RPS Policy HAZ-CL-P16.

- Avoiding further or continuing effects, as the first priority, and only where avoidance is not reasonably practicable, mitigating or remediating, adverse effects of the contaminants on the environment; and
- Prioritising the identification and management of contaminated land at risk from the effects of climate change.

A DSI (EC Otago (2026)) has been prepared to inform the Application as the Site contains areas where HAIL activities have occurred. To manage the risks associated with contaminated lands, the following is proposed:

- Remediation of parts of the Site is proposed, where there is an exceedance in the commercial / industrial SCS;
- Where testing finds soil heavy metal concentrations exceeding background levels, this soil may not be treated as cleanfill and must either be disposed of offsite appropriately or encapsulated onsite; and
- The preparation and adherence to a certified CSMP.

These measures appropriately meet the contaminated land provisions of the Proposed RPS.

Historical and Cultural Values

Wāhi Tūpuna

The provisions of this section of the Proposed RPS seek that wāhi tupuna and their associated cultural values are identified and protected, [195] and that the rakatirataka of mana whenua over wāhi tupuna is recognised. [196]

The draft TIA details the cultural landscape of the area where the Project is anticipated to occur. The draft TIA also considers any effects on cultural values and potential impacts on these values. As mentioned throughout this Application, SLPL is committed to an ongoing relationship with the Kā Rūnaka to ensure wāhi tūpuna and cultural values are recognised and protected where appropriate.

Historic Heritage

The sole objective relating to historic heritage seeks to ensure that historic heritage contributes to the region's character, sense of identity, and social, cultural and economic well-being, and people's understanding and appreciation of it is enhanced, and that it is

[195] Proposed RPS Objective HCV-WT-O1 and Policy HCV-WT-P1.

[196] Proposed RPS Objective HCV-WT-O2 and Policies HCV-WT-P2 and HCV-WT-P2A.

protected for future generations against inappropriate use and development. [197] The subsequent policies set out the components of historic heritage that is to be recognised, [198] and that historic heritage is to be identified. [199] Policy HCV-HH-P5 sets out how historic heritage is to be managed.

As mentioned in Section 3 of this Application, an Archaeological Authority was sought and acquired (Archaeological Authority 2026-362) from HNZPT under the HNZPT Act 2014. The Authority provides for the removal of all above ground visible buildings and archaeology and all below ground features up to the proposed depth of excavations on the Site associated with the Holmhead Farm archaeological site. This process is outside of the scope of this Application; however, for completeness, SLPL will manage the archaeological site in accordance with the Authority.

Urban Form and Development (still under appeal)

The sole objective in this section of the Proposed RPS seeks that the development and change of Otago's urban areas occurs in a strategic and coordinated way, which: [200]

- Accommodates the diverse and changing needs and preferences of Otago's people and communities, now and in the future;
- Integrates effectively with surrounding urban areas and rural areas;
- Results in a consolidated, well-connected and well-designed urban form which is integrated with infrastructure; and
- Supports climate change adaptation and climate change mitigation.

Policy UFD-P1 requires strategic planning to be undertaken to precede urban growth and development, with this strategic planning needing to demonstrate at lease sufficient development capacity supported by integrated infrastructure provision for Otago's business needs in the short, medium and long term (among other matters). This is reiterated by Policy UFD-P2 which seeks to ensure that at least sufficient business development capacity is provided in the short, medium and long term. The FDS has been prepared to address the development capacity requirements of the NPS-UD. The FDS is addressed earlier in this Application in respect of the NPS-UD.

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[197] Proposed RPS Objective HCV-HH-O3.

[198] Proposed RPS Policy HCV-HH-P3.

[199] Proposed RPS Policy HCV-HH-P4.

[200] Proposed RPS Objective UFD-O1.

Policy UFD-P4 sets out the circumstances where the expansion of existing urban areas my occur. This includes:

- Contributes to establishing or maintaining the qualities of a well-functioning urban environment;
- Is identified by and undertaken consistent with strategic plans or is required to address a shortfall in business / housing capacity;
- Achieves consolidated, well designed and sustainable development in and around existing urban areas;
- Is logically and appropriately staged, and will not result in inefficient or sporadic patterns of settlement and residential growth;
- Is integrated efficiently and effectively with development infrastructure and additional infrastructure in a strategic, timely and co-ordinated way;
- Addresses issues of concern to iwi and hapū, including those identified in any relevant iwi planning documents;
- Manages adverse effects on other values or resources identified by the Proposed RPS that require specific management or protection; and
- Avoids HPL except as provided for in the NPS-HPL, and considers adverse effects, particularly reverse sensitivity effects, on existing and anticipated primary production or rural industry activities when determining the location of the new urban/rural boundary.

To the extent that the Project expand an urban area, it is noted that:

- The SLIP has been identified in the FDS, as has already been described;
- There is a clear need for the SLIP to address capacity constraints at existing port facilities, and to reduce trucks on the roading network around Dunedin;
- The Project is adjacent to an existing industrial (urban) area;
- The technical assessments supporting this Application have confirmed that the Project can be appropriately serviced from an infrastructure perspective;
- The Project will not result in inefficient or sporadic growth;
- A draft TIA has been prepared which identifies actual or potential effects to cultural values and identifies areas of concern for the Project;
- The adverse effects of the Project can be avoided, remediated, mitigated; and

- The NPS-HPL provides for the Project, given the long term constraints onsite, as described earlier in this assessment.

Policies UFD-P5 and UFD-P6 address commercial and industrial activities, respectively. These policies set out how these business activities are to be provided for, including by (in respect of industrial activities):

- Identifying specific locations and applying zoning suitable for accommodating industrial activities and their reasonable needs and effects including supporting or ancillary activities;
- Identifying a range of land sizes and locations suitable for different industrial activities, and their operational needs including land-extensive activities; and
- Managing the establishment of non-industrial activities, in industrial zones, to avoid the likelihood of reverse sensitivity effects on existing or potential industrial activities arising, unless the potential for reverse sensitivity is insignificant.

The FDS specifically addresses the need for an inland port, and identifies the Site as being potentially suitable for such development. The Project is consistent with the FDS.

The final policy in this section of the Proposed RPS provides criteria for significant development capacity.[201] This policy sets out that significant development capacity is provided for where a proposed plan change affecting an urban environment meets the following criteria:

- Required development infrastructure can be provided effectively and efficiently for the Project, and without material impact on planned development infrastructure provision to, or reduction in development infrastructure capacity available for, other feasible, likely to be realised developments, in the short-medium term;
- The Project makes a significant contribution to meeting a need identified in a Housing and Business Development Capacity Assessment, or a shortage identified in monitoring for:
  - Housing of a particular price range or typology, particularly more affordable housing;
  - Business space or land of a particular size or locational type;
  - Community or educational facilities;

[201] Proposed RPS Policy UFD-P10.

- When considering the significance of the Project's contribution to a matter in the bullets above, this means that the Project's contribution:
  - Is of high yield relative to either the forecast demand or the identified shortfall;
  - Will be realised in a timely (i.e. rapid) manner;
  - Is likely to be taken up; and
- Will facilitate a net increase in district-wide up-take in the short to medium term.

While this Project is not seeking approval via a plan change, it is noted that:

- The FDS has identified a need for an inland port; and
- The Project will be developed in a timely manner and clearly will be utilised as an inland port (i.e. it will not be vacant land with an industrial type zoning).

Summary

It is therefore considered that the Project is consistent with the provisions of the Proposed RPS.

9.3.10 Operative Otago Regional Policy Statement

Overview

The Operative Otago Regional Policy Statement ("**Operative RPS**") became fully operative in March 2024. The Operative RPS will be superseded by the Proposed RPS discussed in the previous section. Given the Proposed RPS will supersede the Operative RPS and as the vast majority of appeals have been settled via consent order, substantially more weight should be given to the Proposed RPS than the provisions in the Operative RPS. As has been previously described, the only parts of the Proposed RPS that are subject to appeal relate to the urban form and development chapter. In this respect, the following assessment of the Operative RPS is focussed only on the provisions that relate to urban form and development – given the other provisions of the Proposed RPS are beyond challenge and effectively operative.

Urban Form and Development Provision Assessment

Objective UFD-O1 states that the development and change of Otago's urban areas occurs in a strategic and coordinated way, that:

- Accommodates the diverse and changing needs and preferences of Otago's people and communities, now and in the future;

- Integrates effectively with surrounding urban areas and rural areas;
- Results in a consolidated, well-connected and well-designed urban form which is integrated with infrastructure; and
- Supports climate change adaptation and climate change mitigation.

Policy UFD-P1 requires that urban growth is preceded by integrated, forward-looking strategic planning undertaken at an appropriate scale. The policy seeks to ensure that development capacity, infrastructure provision, and urban form are coordinated to support high-quality, affordable housing and well-functioning business areas. It emphasises planning that responds to long-term needs, improves connectivity, and supports climate resilience and adaptation.

Policy UFD-P2 seeks to ensure that at least sufficient housing and business development capacity is provided in urban areas in the short, medium and long term. Policy UFD-P4 details the scenarios where expansion of existing urban areas may occur. These include:

- Areas that contribute to establishing or maintaining the qualities of a well-functioning urban environment;
- Areas that are identified by and undertaken consistent with strategic plans;
- Expansion achieves consolidated, well designed and sustainable development in and around existing urban areas;
- Expansion that is logically and appropriately staged, and will not result in inefficient or sporadic patterns of settlement and residential growth;
- Expansion is integrated efficiently and effectively with development infrastructure and additional infrastructure in a strategic, timely and co-ordinated way;
- Expansion addresses issues of concern to iwi and hapū, including those identified in any relevant iwi planning documents;
- Expansion manages adverse effects on other values or resources identified by this RPS that require specific management or protection; and
- Expansion avoids, HPL except as provided for in the NPS-HPL, and considers adverse effects, particularly reverse sensitivity effects, on existing and anticipated primary production or rural industry activities when determining the location of the new urban/rural boundary.

The Site is adjacent to an existing industrial area and SLPL seeks to utilise DCC's water and wastewater reticulation network. The Site was identified as a potential location for an inland

port in the FDS which is a strategic planning document. Further, all adverse effects identified in Section 6 of this Application can be remedied or mitigated adequately to manage any adverse effects. For matters specific to the avoid policy utilising HPL, these have been addressed in Section 9.3.5 of this report.

Summary

It is therefore considered that the Project is consistent with the remaining relevant provisions of the Operative RPS.

9.3.11 Otago Regional Plan: Water

Overview

The Regional Water Plan controls the use, development and protection of the freshwater resources, including the beds and margins of waterbodies, of the Otago Region. Since its notification in 1998, the Regional Water Plan has been subject to several plan changes and variations.

Kai Tahu ki Otago Water Perspective

Section 4 of the Regional Water Plan sets out the issues of significant concern of Kai Tahu, which includes:

- Traditional environmental management systems and values, which include mauri, tapu and rahui, have not been adequately recognised by planning and resource consent processes; [202]
- Significant loss of the traditional mahika kai resource and its supporting habitat, or loss of access to it, has occurred and could continue to occur; [203]
- Development and use of the beds and margins of lakes and rivers can result in adverse effects on waahi taoka and waahi tapu and Kai Tahu access to them; [204]
- Cross mixing of water from one catchment to another may adversely affect the mauri of the catchments; [205]
- Discharge of human waste and other contaminants to Otago's water bodies from point and non-point sources is an affront to Kai Tahu; [206]

[202] Regional Water Plan Issue 4.13.1.
[203] Regional Water Plan Issue 4.13.2.
[204] Regional Water Plan Issue 4.13.3.
[205] Regional Water Plan Issue 4.13.4.
[206] Regional Water Plan Issue 4.13.5.

- Many wetlands of significance to Kai Tahu have been lost, and their loss could continue;[207]
- The impact land use has had on adjacent water, particularly in lower catchment areas, has adversely affected Kai Tahu cultural and spiritual beliefs, values and uses; [208]
- Restoration and enhancement programmes may be required for water bodies and catchment areas suffering degradation due to developmental pressure; and[209]
- The traditional relationship of Kai Tahu and their associated values with the water resource has been overlooked in the monitoring of the region's water resources. [210]

These issues are addressed through objectives and policies in other sections of the Regional Water Plan.

Natural and Human Use Values of Lakes and Rivers

Objective 5.3.1 seeks the maintenance or enhancement of the natural and human use values, identified in Schedules 1A, 1B and 1C, that are supported by the region's lakes and rivers.

Silver Stream is described in Schedule 1A (natural values) as having the following values:

Ecosystem Values

- Gravel substrata;
- Free of aquatic pest plants;
- Significant presence of trout;
- Significant presence of eels;
- Presence of significant trout spawning area;
- Presence of significant areas for development of juvenile trout;
- Presence of a significant range of indigenous invertebrates (in the mid-reaches);
- Presence of riparian vegetation of significance to aquatic habitats in the upper catchment;

[207] Regional Water Plan Issue 4.13.6.
[208] Regional Water Plan Issue 4.13.7.
[209] Regional Water Plan Issue 4.13.8.
[210] Regional Water Plan Issue 4.13.9.

- Presence of indigenous invertebrates threatened with extinction – upstream of map co-ordinates I44:144849; and
- Presence of indigenous fish species threatened with extinction.

Significant Indigenous Vegetation and Significant Habitat of Indigenous Fauna

- Significant habitat for koaro upstream of map co-ordinates I44:114899 and including several tributaries; and
- Significant habitat for lamprey (uncommon in Otago).

Area with a High Degree of Naturalness

- A high degree of naturalness above 900 metres asl and within Scenic Reserve and water reserve.

Silver Stream is described in Schedule 1B (Water Supply Ba) as having the following values:

- Dunedin Water Supply at map references I44:096859, I44:105844, I44:105848 and I44:105850.

Objective 5.3.2 is to maintain or enhance the spiritual and cultural beliefs, values and uses of significance to Kai Tahu, identified in Schedule 1D, as these relate to Otago's lakes and rivers.

The Schedule 1D values applying to Silver Stream include:

- MA1: Kaitiakitanga – the exercise of guardianship by Kai Tahu in accordance with tikanga Maori in relation to Otago's natural and physical resources, and includes the ethic of stewardship;
- MA2: Mauri – life force; for example, the mauri of a river is most recognisable when there is abundance of water flow and the associated ecosystems are healthy and plentiful; a most important element in the relationship that Kai Tahu have with the water bodies of Otago;
- MA3: Waahi tapu and/or Waiwhakaheke – sacred places; sites, areas and values associated with water bodies that hold spiritual values of importance to Kai Tahu. (Note: Kai Tahu should be consulted regarding the location of these places, sites areas and values for a river identified as MA3);
- MA4: Waahi taoka – treasured resource; values, sites and resources that are valued and reinforce the special relationship Kai Tahu have with Otago's water resources;

- MB1: Mahika kai – places where food is procured or produced. Examples in the case of waterborne mahika kai include eels, whitebait, kanakana (lamprey), kokopu (galaxiid species), koura (fresh water crayfish), fresh water mussels, indigenous waterfowl, watercress and raupo;
- MB2: Kohanga – important nursery/spawning areas for native fisheries and/or breeding grounds for birds; and
- MB3: Trails – sites and water bodies which formed part of traditional routes, including tauraka waka (landing place for canoes).

Policy 5.4.1 requires the identification of natural and human use values supported by the regions lakes and rivers, and as expressed in Schedule 1. Policy 5.4.2 requires the management of any activity involving surface water, groundwater or the bed or margin of any lake or river, to give priority to avoiding, in preference to remedying or mitigating:

- Adverse effects on:
  - Natural values identified in Schedule 1A;
  - Water supply values identified in Schedule 1B;
  - Registered historic places identified in Schedule 1C, or archaeological sites in, on, under or over the bed or margin of a lake or river;
  - Spiritual and cultural beliefs, values and uses of significance to Kai Tahu identified in Schedule 1D;
  - The natural character of any lake or river, or its margins;
  - Amenity values supported by any water body; and
- Causing or exacerbating flooding, erosion, land instability, sedimentation or property damage.

Based on the conclusions of E3 Scientifics (2026b) Freshwater Ecological Impact Assessment as discussed in Section 6 of this Application, the Project will result in low, or less than minor, effects to the identified values that apply to Silver Stream.

Policy 5.4.2A addresses the loss or river extent and values. The Project does not involve any reclamation or culverting of Silver Stream, and the stormwater discharge structure is not expected to impact the values of Silver Stream consistent with this policy.

Policy 5.4.3 requires that for activities involving surface water, groundwater or the bed or margin of any lake or river, to give priority to avoiding adverse effects on existing lawful uses and existing lawful priorities for the use of lakes and rivers and their margins. It is not

anticipated that the discharges associated with the Project will affect any existing uses or priorities for Silver Stream.

Kai Tahu's interests in Otago's lakes and rivers are to be recognised in accordance with Policy 5.4.4. This is to be achieved by promoting opportunities for their involvement in resource consent processing.

As mentioned throughout the Application, SLPL has had an ongoing relationship with the Kā Rūnaka and have been utilising pathways to receive feedback on proposals and draft technical reports associated with the Project. All stormwater management systems have been designed with best practice in mind and ensures all water is treated appropriately before any discharges to Silver Stream occurs. There are no water intakes or wastewater discharges to ground, or water proposed as part of this activity, therefore will align with Policy 5.4.3 and avoiding any adverse effects on Silver Stream.

Objective 5.3.3 addresses natural character, seeking the protection of the natural character of lakes and rivers. Policy 5.4.2 requires the following to have particular regard to when considering effects on natural character:

- The topography, including the setting and bed form of the lake or river;
- The natural flow characteristics of the river;
- The natural water level of the lake and its fluctuation;
- The natural water colour and clarity in the lake or river;
- The ecology of the lake or river and its margins; and
- The extent of use or development within the catchment, including the extent to which that use and development has influenced the matters in the bullets above.

Mike Moore Landscape Architect (2026) assesses that the Project will not materially affect the character of Silver Stream, giving its highly modified nature and the small-scale nature of the works proposed in proximity to the stream. E3 Scientific (2026b) assesses effects on the values of Silver Stream to be low, or less than minor. However, it is intended that with the implementation of proposed natural character enhancement measures, the Project will positively contribute to strengthening the character of Silver Stream by way of the removal of pest / weedy species from the stream and the establishment of additional plantings.

Objective 5.3.4 seeks the maintenance or enhancement of the amenity values associated with lakes and rivers, and their margins. Policy 5.4.9 requires particular regard to be had to the following qualities or characteristics of rivers and lakes (and their margins) when considering adverse effects on amenity values:

- Aesthetic values; and
- Recreational opportunities provided by the lake or river, or its margins.

The Project will not alter the available recreational opportunities associated with Silver Stream. In respect of aesthetic values, only small-scale works are proposed within the vicinity of the stream – associated with the creation of stormwater spillway structures and potential slope stabilisation.

In respect to public access, Objective 5.3.5 is to maintain or enhance public access to and along the margins of lakes and rivers. Policy 5.4.6 sets out that legal public access to, and along, the margins of lakes and rivers will only be restricted where necessary – to protect indigenous species or habitats, to protect Kai Tahu values, to address health or safety concerns, to ensure security or other exceptional circumstance. Where existing access is restricted, Policy 5.4.7 seeks the provision or enhancement of alternative access. It is not expected the Project will alter the current level of public access to Silver Stream.

Objectives 5.3.6 provides for the sustainable use and development of Otago's water bodies, and the beds and margins of Otago's lakes and rivers. The policies:

- Provide for activities that have no more than minor adverse effects, as permitted activities;[211]
- Promote the establishment of appropriate water use groups to assist in the management of water resources; and[212]
- Encourage and support community initiatives that assist in achieving the maintenance or enhancement of water bodies.[213]

The Project has been designed in accordance with the objectives and policies listed above, specifically around the sustainable use and development of the water bodies in Otago. The Project proposes adequate stormwater management and treatment onsite before any discharges to Silver Stream occurs resulting in low, or less than minor effects on Silver Stream. There are no approvals being sought for water takes, with the Project seeking to connect to the Council's reticulated network (avoiding potential effects on Silver Stream). SLPL will undertake planting on the bank of the river to enhance biodiversity and ecosystem benefits and to reduce adverse effects cause by construction, and potentially operation.

[211] Regional Water Plan Policy 5.4.11.
[212] Regional Water Plan Policy 5.4.12.
[213] Regional Water Plan Policy 5.4.13.

Therefore, it is considered that the Project aligns with the objectives and policies mentioned above.

The heritage values associated with lakes and rivers are to be maintained, in accordance with Objective 5.3.7 and Policy 5.4.10.

The draft TIA highlights the historic and cultural values of the surrounding land and water bodies within proximity to the Site. Where possible, SLPL has proposed to avoid, remedy or mitigate any actual or potential effects on Silver Stream.

Natural hazards are the focus of Objective 5.3.8, which seeks to avoid the exacerbation of any natural hazard or the creation of a hazard associated with lakes and rivers. Natural hazards are addressed earlier in this assessment in respect to the NPS-NH which is considered to equally apply to the provisions of the Regional Water Plan.

Water Quality

There are three objectives in this section of the Regional Water Plan, which seek:

- The maintenance of water quality in Otago lakes, rivers, wetlands, and groundwater, but the enhancement of water quality where it is degraded;[214]
- The enablement of the discharge of water or contaminants to water or land, in a way that maintains water quality and supports natural and human use values, including Kāi Tahu values; and[215]
- Individuals and communities manage their discharges to reduce adverse effects, including cumulative effects, on water quality.[216]

Policy 7.B.1 sets out how the quality of water in lakes, rivers, wetlands and groundwater is to be managed, including by:

- Describing, in Table 15.1 of Schedule 15, characteristics indicative of Good Quality Water;
- Setting, in Table 15.2 of Schedule 15, receiving water numerical limits and targets for achieving Good Quality Water;
- Maintaining, from the dates specified in Schedule 15, Good Quality Water;

[214] Regional Water Plan Objective 7.A.1.
[215] Regional Water Plan Objective 7.A.2.
[216] Regional Water Plan Objective 7.A.3.

- Enhancing water quality where it does not meet Schedule 15 limits, to meet those limits by the date specified in the Schedule;
- Recognising the differences in the effects and management of point and non-point source discharges;
- Recognising discharge effects on groundwater; and
- Promoting the discharge of contaminants to land in preference to water.

Table 15.2 sets out the water numerical limits and targets for achieving good quality water. Water quality in Taiari was to meet the limits for nitrate-nitrogen (0.075 mg/l), dissolved reactive phosphorus (0.01 mg/l), E Coli (260 cfu/100 ml) and turbidity (5 NTU) by 31 March 2025. For ammoniacal nitrogen (0.1 mg/l) this needed to be met by 31 March 2012.

E3 Scientific (2026b) identifies existing exceedances of the guideline values considering both the NPS-FM and the Regional Water Plan. The assessment identifies the total amount of nitrogen in Silver Stream at the Taieri Depot was 0.46mg/L and dissolved inorganic nitrogen was 0.3mg/L which exceeds the numerical limits and targets for achieving good water.

Policy 7.B.2 requires the avoidance of objectionable discharges of water or contaminants to maintain the natural and human use values, including Kai Tahu values, of lakes, rivers, wetlands, groundwater and open drains / water races that join them. Policy 7.B.3 allows discharges to freshwater bodies that have minor effects or that are short term discharges with short term adverse effects. The Project will not result in any objectionable discharges to water, with E3 Scientific (2026b) confirming the low level of anticipated effects.

Policy 7.B.4 sets out that when considering any discharge of water or contaminants to land, have regard to:

- The ability of the land to assimilate the water or contaminants;
- Any potential soil contamination;
- Any potential land instability;
- Any potential adverse effects on water quality; and
- Any potential adverse effects on use of any proximate coastal marine area for contact recreation and seafood gathering.

All of these matters have been addressed within the Freshwater Ecology Assessment.

When assessing any consent to discharge contaminants to water, Policy 7.B.6 requires consideration of the need for and extent of any zone for physical mixing, within which water will not meet the limits described in Schedule 15, by taking account of:

> The sensitivity of the receiving environment;

> The natural and human use values, including Kāi Tahu values;

> The natural character of the water body;

> The amenity values supported by the water body;

> The physical processes acting on the area of discharge;

> The particular discharge, including contaminant type, concentration and volume;

> The provision of cost-effective community infrastructure; and

> Good Quality Water as described in Schedule 15.

E3 Scientific (2026b) identifies that Silver Stream contains elevated nitrogen levels therefore it does not meet the definition of 'good water' under Schedule 15. However, E3 Scientific (2026b) has considered the matters listed above, and concluded that potential effects on Silver Stream caused by earthworks and stormwater discharge will be low, or less than minor.

Policies 7.B.7 and 7.B.8 encourage, respectively:

> Land management practices that reduce the adverse effects of water or contaminants discharged into water; and

> Adaptive management and innovation that reduces the level of contaminants in discharges.

Construction activities will be managed in accordance with standard erosion and sediment control measures to ensure there are no construction related effects on Silver Stream. In respect to ongoing stormwater discharge, the Stormwater Assessment (Stantec (2026d)) includes detail as to how the stormwater will be treated prior to discharge.

The policies in section 7.C address hazardous substances, stormwater and discharges from industrial or trade premises (among other discharges). Policy 7.C.1 sets out that when considering applications for resource consents to discharge contaminants to water, to have regard to opportunities to enhance the existing water quality of the receiving water body at any location for which the existing water quality can be considered degraded in terms of its capacity to support its natural and human use values. In addition, the following must be had

regard to when considering applications to discharge contaminants to water, or into or onto land in circumstances which may result in any contaminant entering water: [217]

- The nature of the discharge and the sensitivity of the receiving environment to adverse effects;
- The financial implications, and the effects on the environment of the proposed method of discharge when compared with alternative means; and
- The current state of technical knowledge and the likelihood that the proposed method of discharge can be successfully applied.

Any relevant standards and guidelines must be considered in imposing conditions on discharge consents.[218]

E3 Scientific (2026b) addresses the sensitivity of the receiving environment, concluding that the Project will not result in significant adverse effects on Silver Stream.

Policy 7.C.5 requires the avoidance of significant adverse environmental effects and minimise other adverse effects on water bodies, with respect to discharges from any new stormwater reticulation system, or any extension to an existing stormwater reticulation system, by:

- Measures to prevent contamination of the receiving environment by industrial or trade waste;
- The use of appropriate techniques to trap debris, sediments and nutrients present in runoff;
- Consideration of appropriate measures to reduce and/or attenuate stormwater being discharged from rain events; and
- Consideration of appropriate measures for discharging to land, in preference to discharging directly to water, to address adverse effects on Kāi Tahu cultural and spiritual beliefs, values and uses.

Stantec (2026d) sets out the measures proposed to treat stormwater prior to discharge to Silver Stream, and these measures are consistent with Policy 7.C.5. With these mitigations in place, effects on Silver Stream will be low, or less than minor, as assessed by E3 Scientific (2026b).

[217] Regional Water Plan Policy 7.C.2.

[218] Regional Water Plan Policy 7.C.3.

Policy 7.C.7 and Policy 7.C.8 relate to hazardous substances; use and storage of hazard substances on the Site is not proposed under this Application. Any future subsequent applications for use and storage of hazardous materials would be anticipated to address these policies accordingly.

Policy 7.C.9 supports the coordination of measures to manage the effects associated with accidental spills. Provisions have been made through the design of the onsite wastewater and stormwater systems to manage the risk of accidental spills from the container wash bay associated with flood events, and further a Spill Response Plan is proposed to be implemented (refer to **Part C**) which seeks to ensure appropriate management measures are implemented to avoid, remedy, mitigate, and / or minimise risks from contaminant spills to both the onsite environment (including Silver Stream), and offsite / surrounding environments.

Policy 7.C.12 manages the effects of wastewater from existing reticulated wastewater systems, including extensions to those systems. As has previously been described, it is intended the SLIP will connect to the DCC wastewater system – and DCC has confirmed that there is capacity in the system for the wastewater generated from the Project, subject to upgrading or extending the existing network and taking onsite actions to limit trade waste flows and general wet weather flows during heavy rainfall events, as described in Stantec(2026e).

Beds and Margins of Lakes and Rivers

The relevant objectives in section 8 of the Regional Water Plan seek:

- The maintenance of the stability and function of existing structures located in, on, under or over the bed or margin of any lake or river, the stability of the bed and bank of any lake or river and the flood and sediment carrying capacity of any lake or river; [219]
- The minimisation of a reduction in water clarity caused by bed disturbance; [220]
- The maintenance of the integrity of existing defences against water; and [221]
- The maintenance of the passage of fish, or improvement of the passage of fish, by instream structures. [222]

[219] Regional Water Plan Objective 8.3.1.
[220] Regional Water Plan Objective 8.3.2.
[221] Regional Water Plan Objective 8.3.3.
[222] Regional Water Plan Objective 8.3.5.

When considering applications in, on, under or over the bed or margin of any river or lake, decision makers are to give priority to avoiding changes in the nature of flow and sediment processes in waterbodies, where those changes will cause adverse effects.[223] Where adverse effects are unable to be avoided on values identified in Schedule 1 in the Regional Water Plan, natural character, amenity values or heritage values, financial contributions (or other works to offset, remedy of mitigate the effects) may be required. [224]

As has previously been described, the only works on the margin of Silver Stream are associated with stormwater spillways and potential slope stability measures, which will be refined as far as possible in extent, and not impact the character of the stream. Further, it is proposed there will be enhancement works and planting mitigation on the bank of the stream. In addition, E3 Scientific(2026b) confirms that the effects of the Project on freshwater values will be low, or less than minor.

In respect to policies applying to bed or margin disturbance, the following provisions require:

> Having regard to any adverse effect on fish spawning, bed and bank stability, water quality, amenity values cause by any reduction in water clarity and downstream users; and[225]

> The promotion of best management practices for activities that occur within or adjacent to the bed or lakes and rivers in order to manage any adverse effects.[226]

These matters are all addressed in the Freshwater Ecology Assessment.

Policy 8.7.1 promotes the creation, retention and enhancement of appropriate riparian vegetation, and Policy 8.7.2 prohibits the introduction of any pest plant in waterbodies. As has previously been set out in this Application, the riparian vegetation around Silver Stream will be retained, with the exception of any pest or weedy species which are proposed to be removed.

Groundwater

Objective 9.3.1 seeks to sustain the recognised uses of groundwater, and Objective 9.3.3 seeks the maintenance of the quality of groundwater. Objective 9.3.5 seeks to avoid the degradation of soils arising from the inappropriate application of poor quality groundwater.

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[223] Regional Water Plan Policy 8.4.1.

[224] Regional Water Plan Policy 8.4.2.

[225] Regional Water Plan Policy 8.6.1.

[226] Regional Water Plan Policy 8.6.2.

The policies that implement this objective require:

- Ensuring the suitability of aquifers to support recognised groundwater uses identified in Schedule 3 of the Regional Water Plan is maintained; [227]
- Ensuring appropriate siting, construction and operation of new groundwater bores; [228]
- New drill holes to be appropriately sealed to prevent contaminants entering any aquifer;[229]
- The identification of land that is high risk in terms of the vulnerability of underlying groundwater to leachate contamination – and to manage that risk appropriately; [230]
- The identification of land which protects underlying aquifers from leachate contamination and to manage excavation, with respect to this land, so that any protective soil mantle or impervious stratum is retained or replaced, or alternative groundwater protection is provided; [231]
- All practical alternative locations for the storage of hazardous substances have been considered before such storage occurs over Zone A of any Groundwater Protection Zone identified on the C- series map; and [232]
- Supporting appropriate codes of practice and management guidelines for land use activities which may result in contaminants entering groundwater.[233]

In respect to these policy directives:

- No groundwater takes are proposed within this Application;
- Whilst not anticipated, if detailed design identifies a requirement for dewatering, any consenting implications will be addressed prior to any associated construction works taking place;
- This Application does not include the use and storage of hazardous substances – policies relating to hazardous substances and groundwater can be addressed in any separate resource consent application that is made; and

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[227] Regional Water Plan Policy 9.4.1.
[228] Regional Water Plan Policy 9.4.14.
[229] Regional Water Plan Policy 9.4.17.
[230] Regional Water Plan Policy 9.4.18.
[231] Regional Water Plan Policy 9.4.19.
[232] Regional Water Plan Policy 9.4.20.
[233] Regional Water Plan Policy 9.4.21.

- The discharges to land associated with construction activities and stormwater management will not impact groundwater quality.

Summary

It is therefore considered that the Project is consistent with the provisions of the Regional Water Plan.

9.3.12 Otago Regional Plan: Waste

Overview

The Regional Waste Plan, which was made operative in April 1997 and last updated in July 2022, provides direction in respect of waste minimisation, landfills, contaminated sites and hazardous substances and wastes.

Mana whenua Issues

The key provisions seek the following:

- The quality of Otago's natural and physical resources is not degraded by wastes; [234]
- The protection of the mauri of Otago's natural and physical resources and the restoration of the mauri of waste-affected resources; [235]
- Waste management practices are compatible with Kai Tahu values; and [236]
- A holistic approach is adopted to waste management which integrates Kai Tahu cultural concepts.[237]

The Project has been designed in a way that seeks to ensure there are no adverse effects caused by waste, contamination or hazardous substances generated and this includes circumstances where these contaminants could enter water. Draft CSMP and a RAPs (provided in **Part D**) have been developed to ensure any works associated with contaminated land are appropriately managed and any adverse effects are avoided or mitigated accordingly.

As mentioned earlier, there are numerous measures put in place to ensure contaminants do not enter Silver Stream and to ensure the mauri of the Stream is not degraded by waste or contaminants.

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[234] Regional Waste Plan Objective 3.3.1.
[235] Regional Waste Plan Objective 3.3.2.
[236] Regional Waste Plan Objective 3.3.3.
[237] Regional Waste Plan Objective 3.3.4.

Waste Minimisation

The objectives relevant to waste minimisation seek the following outcomes:

> The minimisation of the amount of waste generated at source; and [238]

> The maximisation of the opportunities for the reuse, recycling and recovery of materials from the waste stream.[239]

Policy 4.4.1 seeks to recognise and provide for the relationship of Kai Tahu have with natural and physical resources.

A draft TIA has been prepared for the purposes of mana whenua interests, rights and Treaty rights. Policy 4.4.1 refers to waste minimisation issues, and the effects inappropriate waste management could have on future generations. There is no specific mention of waste management in the draft TIA, however, the Project will appropriately manage waste onsite through its operating procedures.

Policy 4.4.2 encourages, supports and facilitates integrated waste management, by:

> Minimising the effects on the environment by reducing the quantity and / or toxicity of material entering the waste stream;

> Reusing materials;

> Recycling materials, where practicable, that cannot be reused;

> Recovering resources from materials in the waste stream; and

> Disposing of the residual waste in an environmentally safe manner.

Integrated waste management will be implemented during the construction and operation stages of the Project. As mentioned in the Stormwater Assessment (Stantec (2026d)) there are numerous methods to capture any contaminants or waste before stormwater is eventually discharged into Silver Stream. All other waste management activities will be undertaken in accordance with best practice operations.

Policy 4.4.3 requires that information be gathered on the waste streams in the region and Policy 4.4.4 encourages the composting of appropriate organic waste material.

It is considered that neither of these policies are directly relevant to the Project, and therefore, no further assessment is required.

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[238] Regional Waste Plan Objective 4.3.1.

[239] Regional Waste Plan Objective 4.3.2.

Contaminated Sites

There are two objectives of relevance to contaminated land. These objectives seek:

> The avoidance, remediation or mitigation of any adverse effects of contaminated sites; and[240]

> The avoidance of further site contamination. [241]

Policy 5.4.1 seeks to recognise and provide for the relationship Kai Tahu have with Otago's natural and physical resources.

A draft TIA has been prepared by Aukaha alongside consultation (as detailed in Section 5 of this Application) with the Kā Rūnaka. SLPL has committed to understanding the relationship the Kā Rūnaka has with natural and physical resources that could be impacted by the Project.

Policy 5.4.2 seeks to locate and investigate contaminated sites in Otago, and Policy 5.4.3 seeks to contain contaminated sites and rehabilitate them to the extent practicable, having regard to the use to which the land is to be put. Policy 5.4.3 requires the preparation and maintenance of a register outlining details of sites which are contaminated.

Section 6 of this Application considers all the actual or potential effects of contaminated land present within the Site. All land identified as contaminated, or as potentially contaminated will be adequately managed to use the land as an inland port. All works will be supervised by someone suitably qualified and will align with the policy directions, and matters required under the NES-CS.

Hazardous Substances and Hazardous Wastes

As has previously been described, use and storage of hazardous substances is not proposed as part of this Application. Any use and storage of hazardous substances that form part of the operations at the SLIP will be addressed at a later date in a separate resource consent application (prior to the SLIP becoming operational). In that respect, the objectives and policies of the Waste Plan that address hazardous substances will be addressed at that point.

[240] Regional Waste Plan Objective 5.3.1.

[241] Regional Waste Plan Objective 5.3.2.

Summary

It is therefore considered that the Project is consistent with the relevant provisions of the Regional Water Plan.

9.3.13 Otago Regional Plan: Air

Overview

The purpose of the Regional Air Plan, which was made operative in 2003, is to promote the sustainable management of Otago's air resource. To achieve this, the Air Plan has objectives, policies, rules, and other methods to address the air quality issues facing Otago.

The only discharges to air being considered as part of this application are those associated with the discharge of dust during construction activities.

Diesel generators may be used to provide an alternate electricity supply once the SLIP is operational, however discharges associated with generators will be considered in a separate application, if such generators are deemed to be necessary.

Air Quality Management

This part of the Regional Air Plan sets out the framework for managing air quality and discharges of contaminants to air. In that respect, the objectives seek:

> The maintenance of ambient air quality in parts of Otago that have high air quality, and the enhancement of ambient air quality in places it has been degraded; [242]

> The avoidance of adverse localised effects of contaminant discharges into air on human health, cultural, heritage and amity values, ecosystems, and the life supporting capacity of air; and [243]

> To allow for the sustainable use of Otago's air resource. [244]

One of the primary outcomes of the Project, is to reduce the carbon emissions caused by heavy vehicles in the freight industry. The Project aligns with the objectives listed above. There will be no approvals sought within this Application that would degrade air.

Policy 7.1.1 seeks to recognise and provide for the relationship Kāi Tahu has with the air resource through participation in the management of the air resource.

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[242] Regional Air Plan Objective 6.1.1.

[243] Regional Air Plan Objective 6.1.2.

[244] Regional Air Plan Objective 6.1.3.

SLPL has engaged with the Kā Rūnaka to understand any cultural considerations, and as outlined in Section 5, they support the move to rail and the associated emissions reductions. This ongoing engagement helps ensure their views are reflected in the Project and shows that cultural values have and will continue to be appropriately considered and provided for as part of the Application.

The following policies were considered:

- Policy 8.1.1 seeks to have regard to the Otago Goal Levels identified in the plan and comply with applicable regulations;
- Policy 8.1.2 requires the management of ambient air quality by airsheds and air zones;
- Policy 8.2.1 allows discharges of contaminants to air from industrial or trade premises that have minor or no adverse effects without the need for a resource consent;
- Will be given to avoiding adverse effects form hazardous air contaminants, identified in Schedule 3, when considering the effects of any discharge to contaminants into air, in accordance with Policy 8.2.2;
- Policy 8.2.3 sets out the matters that must be had regard to when considering any application to discharge contaminants into air. Policy 8.2.4 sets out how consent duration will be determined, and Policy 8.2.5 requires a review clause on consents; and
- Policy 8.2.8 requires the avoidance of discharge to air being noxious, dangerous, offensive or objectionable on the surrounding local environment.

There are no discharges proposed that are noxious, dangerous, offensive or objectionable as part of this Application. Therefore, no further assessment is required.

Section 10.1 addresses dust. Policy 10.1.1 seeks that ORC will encourage:

- People undertaking land use activities to adopt management practices to avoid, remedy or mitigate any adverse effects of dust beyond the boundary of the property; and
- Councils to use land use planning mechanisms and other land management techniques to manage land use activities which have the potential to result in dust beyond the boundary of the property.

All dust associated with construction will be managed appropriately and controls related to dust management will be specified in the CMP (a draft version of which is provided in **Part D**). Conditions are offered by SLPL in **Part C** of these application documents which include the management of dust.

Policy 14.1.1 addresses motor vehicle emissions and Policy 15.1.1 supports and promotes, as appropriate, central government initiatives to control and minimise emissions of greenhouse gases and ozone layer depleting substances.

The Project aligns with these policies by reducing carbon emissions from heavy vehicle movements. Savvy Consulting (2026) details that transporting freight by rail reduces CO_2e emissions by around 70% per tonne compared with diesel road freight. By shifting more freight onto the rail network, the Project is expected to lower emissions, improve air quality, and enhance the overall efficiency and productivity of the transport system.

Summary

It is therefore considered that the Project is consistent with the relevant provisions of the Regional Air Plan.

9.3.14 Dunedin City District Plan

Overview

The District Plan became partially operative on 19 August 2024. Attachment 1 of the District Plan sets out the provisions that did not become operative in August 2024. All aspects of the District Plan of relevance to the Project are operative. The District Plan contains objectives, policies and rules which guide the use and development on land in the Dunedin City district.

An assessment of the Project against the relevant objectives and policies of the District Plan is set out in the following sub sections.

Part A: Plan Overview and Strategic Direction

The strategic directions section focuses on key issues for the city and establishes the overall management approach for the Plan, including zoning and other methods used in the District Plan.

Dunedin is Environmentally Sustainable and Resilient

Objective 2.2.1, and its associated polices, seek that the risks from natural hazards, is no more than low. Policy 2.2.1.1 sets out how land use and development is to be managed, whereas Policy 2.2.1.2 sets how to calculate the likelihood and consequences of natural hazards.

Policy 2.2.1.3 and Policy 2.2.1.5 address the identification of areas at risk of flooding and the identification of areas at risk from land instability, respectively. Policy 2.2.1.6 sets out that the risks posed by natural hazards are managed so that they are no more than low through:

- Change the activity status of activities based on the sensitivity of the activity and the level of risk associated with an identified hazard overlay zone;
- Use performance standards on permitted and restricted discretionary activities, wherever appropriate;
- Providing for natural hazard mitigation activities where appropriate; and
- Manage subdivision in a way that considers future land use and development.
- Where there is incomplete or uncertain information regarding natural hazards, a precautionary approach is to be taken.

These matters are further addressed in the natural hazards section of the District Plan, and in the assessment of the NPS-NH which is set out earlier in this section of the Application.

Objective 2.2.2 (and its associated policies) seeks that Dunedin reduces its environmental costs and reliance on non-renewable energy sources as much as practicable, including energy consumption, water use, and the quality and quantity of stormwater discharge, and is well equipped to manage and adapt to changing or disrupted energy. The policies direct:

- The identification of areas important for food protection and protect these areas from activities that may diminish food production capacity. These protection measures include using rules to require high class soils to be retained onsite; [245]
- Enable renewable electricity generation; [246]
- Support transport mode choices and reduced car dependencies, including by requiring subdivision to be designed to support good connectivity for all modes to existing or planned centres, public transport stops, cycleways and neighbouring existing or potential future urban land; and [247]
- Enable and encourage low impact design stormwater management through policies and assessment rules that require stormwater management. [248]

As mentioned previously in this Application, the Site is identified as highly productive but has also been signalled in the FDS as a suitable area for the Project. The Site is not currently used for the purposes of productivity, and the benefits of the Project would largely outweigh the benefits (local, regional and national benefits) of retaining the land as rural farmland.

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[245] District Plan Policy 2.2.2.1.
[246] District Plan Policy 2.2.2.3.
[247] District Plan Policy 2.2.2.4.
[248] District Plan Policy 2.2.2.6.

Consistent with Policy 2.2.2.4, the Application provides for all modes of transport. SLPL and DCC are continuing discussions regarding appropriate mode-shift measures, including the potential use of footpaths.

Further, the stormwater management for the Project has been carefully designed to have low impact design stormwater management. This includes an extensive stormwater system that includes diversion of water, onsite swales, onsite treatment systems and the use of stormwater management devices to ensure stormwater is adequately managed. Any discharge to Silver Stream will be appropriately treated to ensure there are no adverse effects on freshwater or ecosystems in Silver Stream.

In respect to indigenous biodiversity, Objective 2.2.3 seeks that Dunedin's significant indigenous biodiversity is protected or enhanced and restored; and other indigenous biodiversity is maintained or enhanced and restored; with all indigenous biodiversity having improved connections and improved resilience.

The policies that implement this objective are directive, requiring:

- The protection of areas of significant indigenous biodiversity and / or habitats of significant habitats of indigenous fauna, including by:
  - Identifying these areas in the District Plan as Areas of Significant Biodiversity Vales; and[249]
  - Rules which require the consideration of significance as part of the assessment of effects on biodiversity values. [250]
- The maintenance and / or enhancement of indigenous biodiversity in the rural environment through policies and assessment rules that:
  - Require the assessment of effects on biodiversity values for discretionary and non-complying land use, development and city-wide activities;[251]
  - Require the assessment of positive effects on biodiversity values for restricted discretionary, discretionary or non-complying land use, development and city-wide activities; and[252]

[249] District Plan Policy 2.2.3.1 (a).
[250] District Plan Policy 2.2.3.1 (c).
[251] District Plan Policy 2.2.3.3 (b)(i).
[252] District Plan Policy 2.2.3.3 (b)(ii).

> Encourage conservation activities, including through rules that encourage consideration of the positive effects of conservation activities. [253]

Policy 2.2.3.2 provides criteria for identifying areas of significant indigenous vegetation and / or as significant habitats of indigenous fauna where one or more of the criteria are met.

These matters are addressed later in this assessment in respect of the specific biodiversity provisions of the District Plan. Notwithstanding this, the Terrestrial Ecology Assessment (E3 Scientific (2026a)) considers the criteria in the District Plan in determining the significance of the Site in terms of biodiversity values.

Policy 2.2.3.6 then goes on to describe when offsets will be considered as a positive effect, and Policy 2.2.3.7 provides a framework for environmental compensation. The Site is not mapped as a SNA in the District Plan. However, as detailed in Section 6 of this Application, the Site contains biodiversity classified as a significant indigenous vegetation under the District Plan. Further to this, there is no offsetting or compensation proposed as part of the Project because any adverse effects can be avoided, remedied or mitigated to a level considered acceptable.

The balance of the objectives and policies in this section of the plan set out:

> Dunedin aims to be a compact and accessibility city; and [254]

> The risk to people's health and safety from contaminated sites, hazardous substances, and high levels of noise or emissions is minimised. [255]

The Project seeks to allow for more direct connection through the railway network and SLPL is committed to continuing to work with DCC to determine if there is a need for a footpath to the Site, and establishing such a footpath if it is determined there is. Further to these points, a reduction in heavy vehicles will increase road safety as discussed in Section 6 of the Application.

Any health and safety risks associated with construction or operation of the SLIP will be managed through conditions (as per **Part C**), or through management.

Dunedin is Economically and Socially Prosperous

The provisions in this section of the District Plan provide direct support for the Project insofar as they promote activities that provide for economic productivity. Objective 2.3.1

[253] District Plan Policy 2.2.3.4.

[254] District Plan Objective 2.2.4 and Policies 2.2.4.1 to 2.2.4.4.

[255] District Plan Objective 2.2.6 and Policies 2.2.6.1 to 2.2.6.3.

aims for land, facilities and infrastructure that are important for economic productivity and social well-being, which include industrial areas, major facilities, key transportation routes, network utilities, and productive rural land to be protected from less productive competing uses of incompatible activities, and to be able to be developed efficiently and effectively. This is reinforced by Policy 2.3.1.6.

Policy 2.3.1.1 directs that important gateways are identified (including Dunedin Port and Port of Otago) and zone these as major facilities or industrial port, and Policy 2.3.1.4 requires the identification of land strategically important for industrial activities.

The SLIP aligns closely with the objectives and policies set out in the *Dunedin is Economically and Socially Prosperous chapter*, as it enhances economic productivity while also delivering important social benefits.

In addition, the Project is strategically located adjacent to an existing operational railway network, adjoins an established industrial area, and is well connected to major transport routes via local roads and the state highway network. A significant factor of the Project is that the Site enables better and enhanced utilisation of existing port facilities, without encroaching on the land surrounding the existing Port. Therefore, enhancing the sustainability of existing infrastructure.

As mentioned earlier in this Application, the FDS identifies the Site as land potentially suitable for an inland port. The matters mentioned above would have been considered when identifying potential locations and the policy framework under the District Plan would have also been considered.

Policy 2.3.1.2 requires the maintenance and enhancement of the productivity of farming and other activities that support the rural economy. Policy 2.3.1.10 requires the identification of high-class soils and protection of these areas through a high-class soils mapped area.

The Site is identified as having high-class soils under the District Plan, as well as the NPS-HPL. With matters considered under Clause 3.10 of the NPS-HPL, it is considered that the opportunities that present for the Project, outweigh the need to keep the land operating as rural farmland. These details are listed further in Section 9.3.5 above.

Key transportation routes are required to be identified, and the safety and efficiency of these routes is to be protected from inappropriate subdivision and development. [256] The ITA prepared by Stantec (2026c) confirms that both the adjacent road network and the wider

[256] District Plan Policy 2.3.1.5.

integrated transport system between Mosgiel and Dunedin will continue to operate safely and efficiently.

The Site has been deliberately selected because it is exceptionally well suited to accommodating the SLIP. Its location enables the transport network (including the railway network) to not only be protected from inappropriate development but to benefit from the Project. By shifting freight movements away from road-based heavy vehicles and enabling greater use of rail and consolidated logistics, the SLIP will reduce heavy-vehicle demand on key routes. This results in positive effects, including reduced congestion, improved network efficiency, and inherent safety gains across the wider transport system.

Policy 2.3.1.11 enables the safe and efficient operation of bulk fuel storage facilities, while managing the risk from these facilities. No bulk fuel storage facilities are proposed as part of the Project and these considerations are not in scope for this Application**.** Approvals will be sought outside of the FTAA process for any future bulk fuel storage facility needs.

Dunedin is a Memorable City with a Distinctive Built and Natural Character

Objective 2.4.1, and its associated policies, seek that the elements of the environment that contribute to residents and visitors' aesthetic appreciation for, and enjoyment of, the city are protected and enhanced. The policy relevant to this Project requires the avoidance of visual clutter from signage. [257]

Adequate signage is critical to the operation and safety for a major industry site. It is anticipated that signage on the Site will exceed the permitted activity standards set out in **Part G** of this Application and therefore resource consent is sought for this as part of this Application. All signage will be clear of clutter, distractions and adverse visual effects. All signage provided will only be used for the purposes of direction, health and safety or identification. There will be no impacts on aesthetics of residents or visitors of Dunedin City.

Objective 2.4.6, and associated Policies 2.4.6.1 and 2.4.6.2 address, the character of the rural environment. The provisions seek that the character and visual amenity of Dunedin's rural environment is maintained or enhanced.

The Project is located within the rural zone but is perceived as a logical extension of the established industrial land to the west of the Site. The Landscape Effects Assessment (Moore, 2026) acknowledges that the rural landscape will change to accommodate the SLIP but any adverse effects in the character and visual amenity of the Site can be mitigated to an appropriate level. Mitigation techniques include boundary landscaping, building colour

[257] District Plan Policy 2.4.1.6.

controls and natural character enhancement planting on the banks of Silver Stream. With the proposed mitigation (as provided for in the proposed consent conditions in **Part C**), the Project will not result in any significant adverse effects on the surrounding rural character and amenity.

Dunedin is a City that Gives Effect to the Principles of the Treaty of Waitangi, Protects Kāi Tahu Values, Culture and Traditions, and Enables Kāi Tahu to Express Kaitiakitaka

This sub section of the District Plan contains four objectives and six policies. The provisions of relevance to the Project direct:

- That Kāi Tahu exercise kaitiakitaka over resources within their takiwā,[258] including by giving sufficient weight in decision making to Kāi Tahu values,[259] and providing for effective and meaningful engagement with mana whenua; and[260]
- Mahika kai is protected from the adverse effects of land use and development so that it is maintained or enhanced in order to support customary use.[261]

A draft TIA has been prepared to detail any actual or potential effects on cultural interests or values. SLPL is committed to working in partnership with iwi and hapū to ensure any cultural interest and values are managed appropriately.

Dunedin has Quality Housing Choices and Adequate Urban Land Supply

The only provision of relevance to the Project in this section of the District Plan seeks that sufficient, plan enabled business land development capacity is provided to meet the projected demand projects for commercial and industrial activities.[262]

While this Project is not a rezoning, it is noted that the FDS identifies the Site as being potentially appropriate for an inland port.

Dunedin has Affordable and Efficient Public Infrastructure

Objective 2.7.1 seeks that public infrastructure networks operate efficiency and effectively and have the least possible long term cost burden on the public. This is to be achieved by:

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[258] District Plan Objective 2.5.1.

[259] District Plan Policy 2.5.1.1.

[260] District Plan Policy 2.5.1.2.

[261] District Plan Objective 2.5.4 and Policy 2.5.4.1.

[262] District Plan Objective 2.6.1.6 and Policy 2.6.2.4.

- Ensuring that areas of new urban development provide for public infrastructure networks that represent the least possible long-term cost to the public; and [263]
- Avoid future pressure for unplanned expansion of public infrastructure through rules that restrict the density of activity outside of areas reticulated for wastewater, water supply, or stormwater to ensure these are able to be self-sufficient where public infrastructure is not provided. [264]

Objective 2.7.2 and Policy 2.7.2.1 seek to provide for a safe and efficient multi-modal land transport network – including connections between land, air and sea transport networks. This is to be achieved by:

- Providing for transportation activities;
- Managing the location, scale and design of high trip generators;
- Managing the location, number and design of vehicle accesses;
- Requiring onsite vehicle loading where vehicle loading on-street could compromise the safety and efficiency of the transport network;
- Require onsite mobility car parking where necessary to enable adequate accessibility;
- Managing the design of parking, loading and access areas; and
- Requiring minimum separation distance of vehicle crossings from level crossings.
- Requiring clear sightlines where roads, driveways and vehicle tracks cross an operational rail network via a level crossing; and
- Requiring a minimum setback for buildings and structures from the designated rail corridor.

These policies are particularly important for the Project due to the scale, intensity and transport-focused nature of the operation. Inland ports generate high volumes of freight and vehicle movements, including heavy vehicles, meaning that the safe and efficient functioning of the surrounding transport network is fundamental to their operation. Policies requiring careful management of the location, scale, and design of high trip-generating activities ensure that inland ports integrate appropriately with the existing roading and rail network and do not create adverse congestion, safety, or operational effects. These matters

[263] District Plan Policy 2.7.1.2.

[264] District Plan Policy 2.7.1.3.

have been outlined in detail in the ITA (Stantec (2026c)), and it is noted that this Project fundamentally supports connections between land and sea transport networks.

Part B: City Wide Activities

Temporary Activities

Objective 4.2.1 seeks to ensure that temporary activities are enabled while minimising, as far as practicable, any adverse effects on the amenity and character of the zone and ensuring any adverse effects on people's health and safety are minimised as far as practicable. The policies that implement this objective seek to achieve this by:

> Requiring temporary activities to be designed and operated to minimise, as far as practicable, adverse effects on the amenity of surrounding properties, people's health and safety, and the safety and efficiency of the transport network;[265] and

> Requiring temporary signs to be located and designed to minimise, as far as practicable, adverse effects on streetscape amenity and the safety and efficiency of the transport network.[266]

All construction works will be undertaken in accordance with the CMP which will be submitted to DCC for certification prior to any works commencing on Site under the proposed consent conditions (refer to **Part C**). The CMP (provided in draft form in **Part D**) will facilitate the implementation of best practice protocols for the design and operation of construction activities as part of the Project, including erection of temporary structures and plant, management of noise, dust, light, traffic, signage and other construction effects, and communication procedures to stakeholders and potentially affected persons. Erection of temporary construction cranes on the Site will require the Applicant to seek a determination from the CAA Director who will assess the potential for the cranes to constitute a hazard to the Taieri Aerodrome and impose conditions as necessary to ensure the erection and operation of cranes does not pose a hazard to the aerodrome. Therefore, it is considered the Project aligns with the objective and policies.

Transportation

Objective 6.2.1 seeks to ensure that transportation infrastructure is designed and located to ensure the safety and efficiency of the transport network for all travel modes, while managing adverse effects and meeting the applicable objectives and policies for any

[265] District Plan Policy 4.2.1.1.

[266] District Plan Policy 4.2.1.2.

relevant overlay zone, scheduled site or mapped area. The policies that implement this objective seek to achieve this by:

- Enabling the operation, repair and maintenance of the roading network and the operation, repair and maintenance of the rail network; [267]
- Appropriately located road signs; [268]
- Requiring the operation, repair and maintenance of the roading network to be designed and located to ensure the safety and efficiency of the transport network while avoiding or, where avoidance is not practicable, adequately mitigating adverse effects on the amenity and character of the zone; and[269]
- Only allowing new roads or additions or alterations to existing roads in specific situations. [270]

The Project includes amendments to the local roading networks to ensure safe and practical access to the Site as well as reducing transportation effects on other road users. SLPL has had engagement with DCC throughout the preliminary stages of the Project, and feedback on matters related to transport can be found in Section 5 of this Application. DCC has provided input on matters related to road signage, safety of the transport network and proposed alterations to the roading network to ensure alignment with the policy direction listed above.

Objective 6.2.2 seeks that land use activities are accessible by all travel modes. The policies implementing this objective require:

- Land use activities to provide appropriate mobility carparking;[271]
- Only allow high trip generators[272] where the activity is located: [273]
    - Within convenient walking access of sufficient car parking (including any car parking provided onsite) to meet the needs of the activity and, where public car

[267] District Plan Policy 6.2.1.1.

[268] District Plan Policy 6.2.1.2.

[269] District Plan Policy 6.2.1.X.

[270] District Plan Policy 6.2.1.3.

[271] District Plan Policy 6.2.2.1 and Policy 6.2.2.2.

[272] High trip generators are defined in the District Plan as "*a group of activities which includes: (a) within convenient walking access of sufficient car parking (including any car parking provided on-site) to meet the needs of the activity and, where public car parking is relied on, the activity will not significantly impact the availability of that car parking to other nearby activities; and (b) within convenient walking access of travel modes other than private car, except where the activity is of a nature that makes access by travel modes other than the private car impracticable (e.g. Industrial and Port activities).*"

[273] District Plan Policy 6.2.2.Y.

parking is relied on, the activity will not significantly impact the availability of that car parking to other nearby activities; and

- Within convenient walking access of travel modes other than private car, except where the activity is of a nature that makes access by travel modes other than the private car impracticable (e.g. Industrial and Port activities).

The Project aligns with land use activities and their requirement to provide mobility carparking. These provisions will align with the performance standards and rules as per the District Plan. The Project will be a high trip generator, and any adverse effects will be reduced through an increased reliance on the railway network.

Objective 6.2.3 seeks that land use and development maintain the safety and efficiency of the transport network for all travel modes and its affordability to the public. The policies implementing this objective require:

- Ancillary signs to be appropriately designed and located to manage effects on the transport network; [274]
- Shelterbelts be setback from the roading and rail networks to manage the potential for hazards; [275]
- Land use activities to provide adequate vehicle loading and manoeuvring space to support their operations and to avoid or, if avoidance is not practicable, adequately mitigate adverse effects on the safety and efficiency of the transport network; [276]
- To only allow land use activities where any overspill parking effects that could adversely affect the safety and efficiency of the transport network are avoided or, if avoidance is not practicable, adequately mitigated; [277]
- To only allow high trip generators where they are designed and located to avoid or, if avoidance is not practicable, adequately mitigate adverse effects on the safety and efficiency of the transport network; [278]
- To only allow land use and development activities or subdivision activities that may lead to land use or development activities, where: [279]

[274] District Plan Policy 6.2.3.1.
[275] District Plan Policy 6.2.3.2.
[276] District Plan Policy 6.2.3.3.
[277] District Plan Policy 6.2.3.4.
[278] District Plan Policy 6.2.3.8.
[279] District Plan Policy 6.2.3.9.

- adverse effects on the safety and efficiency of the transport network will be avoided or, if avoidance is not practicable, adequately mitigated;
- any associated changes to the transportation network will be affordable to the public in the long term; and

- Require new buildings, new structures, and additions and alterations to be set back an adequate distance from the designated rail corridor to minimise, as far as practicable, the risk of objects or people crossing over or onto the rail corridor as a result of use or maintenance of the building or structure.[280]

The objectives and policies listed above, set the framework for the bulk and location provisions in the District Plan. SLPL has engaged numerous technical experts who have developed technical assessments to support this Application. These reports include assessments of environmental effects and recommendations and / or designs on how to avoid, remedy and mitigate these effects. Section 6 of this Application details how adverse effects on bulk and location requirements will be managed.

Objective 6.2.4, and associated Policies 6.2.4.1 to 6.2.4.7, set out that parking areas, loading areas and vehicle accesses are to be designed and located to provide for the safe and efficient operation of the parking / loading area and the transport network. In addition, parking, loading and vehicle accesses are to be designed and located to facilitate the safe and efficient functioning of the transport network and connectivity for all travel modes.

There has been careful consideration had in the design stages of the SLIP to ensure parking areas, loading areas and vehicle access are designed in accordance with the District Plan, and relevant infrastructure standards. This has been balanced with the functionality of the Site and ensuring the design is suitable for the needs of the Project. It is considered that the design included in this Application allows for safe and efficient functioning of the Site and wider transport network.

The Project will facilitate a reduction in heavy vehicle movements, as a transition to the railway service occurs. This leads to a positive improvement to the wider transport network, because there will be less vehicles on the road, less maintenance required, and lower carbon emissions emitted. Therefore, it is considered the Project aligns with the objective and policies.

[280] District Plan Policy 6.2.3.X.

Earthworks

Section 8A of the District Plan contains one objective that addresses earthworks. Objective 8A.2.1 seeks to enable earthworks necessary for permitted or approved land use and development, while avoiding, or adequately mitigating any adverse effects on:

> Visual amenity and character;

> The stability of land, buildings, and structures; and

> Surrounding properties.

Policy 8A.2.1.1 requires earthworks to be designed to manage effects on the stability of land, buildings and structures by being set back from property boundaries and buildings / structures and using an appropriate batter gradient. Policy 8A.2.1.2 addresses sediment run off and dust nuisance, setting out that these effects of earthworks are to be minimised as far as practicable.

In respect of large-scale earthworks, Policy 8A.2.1.3 requires that earthworks that exceed the scale thresholds are only allowed where the following effects will be avoided or, if avoidance is not practicable, adequately mitigated:

> Effects on visual amenity and character;

> Effects on the amenity of surrounding properties, including from changes to drainage patterns; and

> Effects on the stability of land, buildings, and structures.

All matters relating to earthworks for the Project are detailed in the Civil Works and Earthworks Assessment, prepared by Stantec (2026g) and provided in **Part B** of these application documents. The Project seeks to undertake large-scale earthworks and in accordance with Policy 8A.2.1.3, all effects listed above will be adequately managed. These matters are to be managed in accordance with a CMP (including Erosion and Sediment Control Plans) that are in general accordance with the draft version provided in **Part D** of this Application.

All effects will be managed in accordance with best practice standards.

Part C: City Wide Provisions

Public Health & Safety

Objective 9.2.1, and its associated policies, seek that land use and development maintain or enhance the efficiency and affordability of public water supply, wastewater and stormwater

infrastructure. The applicable policies provide a framework for activities inside, or outside of, public wastewater, water and stormwater serviced areas. The various technical assessments supporting the Project have confirmed how the development will be serviced from a three waters perspective.

Objective 9.2.2 seeks that land use and development maintain or enhance people's health and safety. Policy 9.2.2.1 requires activities to be designed and operated to avoid adverse effects from noise on the health of people or, where avoidance is not practicable, ensure any adverse effects would be insignificant. A Noise Assessment has been undertaken by Marshall Day (2026) (provided in **Part B** of this Application). This assessment finds that noise can be managed to ensure any adverse effects are mitigated appropriately.

In respect to lighting, Policy 9.2.2.4 requires activities to be designed and operated to avoid adverse effects from light spill on the health of people or, where avoidance is not practicable, ensure any adverse effects would be insignificant. Pederson Read (2026) has prepared an Assessment on Environmental Effects – Lighting Report (provided in **Part B**). The conclusion of this assessment found that any lighting associated with the Project (with the appropriate design and mitigation measures), will be less than minor and therefore, aligns with the policy direction.

Policy 9.2.2.5 requires shelterbelts to be set back from boundaries to avoid risk to safety from fire or tree fall. Policy 10.2.1.9 requires shelterbelts to avoid the use of wildling tree species. Shelter belts are proposed to provide screening to adjacent properties.

Policy 9.2.2.9 is specific to earthworks. This policy requires earthworks in groundwater protection mapped areas to not disturb or contaminate groundwater. As the Site is within a groundwater protection mapped area, this policy is directly applicable to the Project.

Stantec (2026b) prepared a Groundwater Assessment which concluded that the Project would have negligible effects on groundwater levels, groundwater flow patterns, groundwater quality, or groundwater users.

Public amenities and signs located on or above footpaths are required to avoid adverse effects on the safety of people.[281] All road signage will be compliant with the relevant standards to ensure safety to all users and will be subject to approval by DCC.

Policy 9.2.2.12 is specific to activities within the Taieri Aerodrome flight fan mapped area, requiring buildings and structures within this area to be of a height that enables the safe operation of the aerodrome.

[281] District Plan Policy 9.2.2.11.

Approval is being sought for non-compliances of rules (provided in **Part G**) associated with temporary construction crane heights within the flight fan mapped area. All proposed permanent structures and buildings will comply with the flight fan mapped area maximum height limit All construction cranes will also be subject to CAA determination. CAA determination is being sought separately from this Application, and the CAA Director can apply conditions as they see fit to ensure any potential hazards to the aerodrome are adequately managed.

Policy 9.2.2.14 address potentially contaminated land, requiring these sites be managed in accordance with the NES-CS – with the NES-CS being addressed earlier in this section.

Natural Environment

Section 10 addresses the management of biodiversity. Objective 10.2.1 seeks that biodiversity values are maintained or enhanced, including by protecting areas of significant indigenous vegetation and significant habitats of indigenous fauna. As has previously been described in this Application, the Site does not contain significant indigenous vegetation. However, due to the presence of the at risk / threatened indigenous species, the Site meets the criteria of being a 'significant habitat of indigenous fauna'.

In that respect, the policies are directive, requiring that land use and development only be allowed where biodiversity are maintained or enhanced.[282] In particular, Policy 10.2.1.X sets the circumstances where land use and development can occur in areas that meet the criteria to be classified as significant habitats of indigenous fauna. Unless the requirements of Policy 10.2.1.Y are met (discussed later in this section), development may only occur in these significant areas where the following are met:

- The values that contribute to the significance of the area are maintained or enhanced;
- Significant adverse effects on other biodiversity values of the area or habitat are avoided;
- Other (non-significant) adverse effects on biodiversity values are avoided or minimised as far as practicable;
- Any proposal for biodiversity offsetting is undertaken in accordance with Policy 2.2.3.6; and
- Any proposal for environmental compensation is undertaken in accordance with Policy 2.2.3.7.

[282] District Plan Policy 10.2.1.1.

Policy 10.2.1.Y addresses buildings and structures that form part of rail infrastructure, port[283] activities and network utility activities (and activities ancillary to these, including earthworks and vegetation clearance) that are seeking to locate in areas that meet the criteria to be considered a significant habitat of indigenous fauna. As this Project meets the definition of 'Port' in the District Plan – being for the 'loading, unloading and storage of cargo" and "any ancillary associated with the operation of the facility, including offices, storage and staff facilities" – this Policy is applicable. In that respect, these activities are only allowed to occur in areas of significant habitat of indigenous fauna where all the following are met.

- The activity has a functional need[284] or operational need[285] to locate in the area;
- Adverse effects on the values that contribute to the significance of the area are:
  - Avoided or, if avoidance is not practicable, remedied or mitigated as necessary to maintain the significance of the area; and
  - Where adverse effects on these values cannot practicably be avoided, remedied or mitigated, biodiversity offsetting is proposed in accordance with Policy 2.2.3.6; and
  - For residual adverse effects that cannot practicably be avoided, remedied, mitigated or offset, environmental compensation is proposed in accordance with Policy 2.2.3.7; and
- Adverse effects on other biodiversity values of significant habitats of indigenous fauna are avoided or minimised as far as practicable, including through biodiversity offsetting that is proposed in accordance with Policy 2.2.3.6, or environmental compensation that is proposed in accordance with Policy 2.2.3.7.

E3 Scientific (2026a and 2026b) confirms that, with the mitigations in place, the effects on indigenous biodiversity of the Project will be low, or less than minor, as discussed in detail in Section 6 and Section 9.3.6 of this Application. Potential ecological effects will be avoided to

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[283] Port is defined in the District Plan as the "*use of land and buildings for the operation of a port. This includes, but is not limited to: (a) mooring, berthing, departure, manoeuvring, refuelling, storage, maintenance and repair of vessels; (b) embarking and disembarking of passengers; (c) loading, unloading and storage of cargo; and (d) any ancillary activities associated with the operation of the facility, including offices, storage and staff facilities. Port is an activity in the major facility activities category.*" This definition of Port does not require it to be located in the Coastal Marine Area or the Coastal Environment.

[284] Functional need is defined in the District Plan as the "*the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment*."

[285] Operational need is defined in the District Plan as the "*the need for a proposal or activity to traverse, locate or operate in a particular environment because of technical, logistical or operational characteristics or constraints*."

the greatest extent practicable, and where required, remedied and mitigated. This includes implementing measures to manage noise and vibration during the construction and operation of the Project to minimise the effects on avifauna and lizards, requiring all lighting to be tilted down and be shielded, undertake lizard salvage and translocation during construction, and implementing biosecurity measures to prevent, detect and control biosecurity threats. Further, the Project has an operational need to establish in the area as discussed in Section 9.3.7 of this Application.

Objective 10.2.4, and its associated policies including Policy 10.2.4.1, seeks that development activities maintain and enhance access to waterbodies and other parts of the natural environment, including for the purposes of gathering food and mahika kai. As has previously been described, the Project will not alter the level of access to Silver Stream.

Natural Hazards

As the Site is identified as being a Hazard 1 (flood) and Hazard 2 (flood) the provisions of Section 11 are directly applicable to the Project. In that respect, Objective 11.2.1 seeks that land use and development is located and designed in a way that ensures that the risk from natural hazards, and from the potential effects of climate change on natural hazards, is no more than low, in the short to long term. The policy framework is risk based, placing specific emphasis on avoiding 'natural hazard sensitive activities' and natural hazard potentially sensitive activities' occurring within flood overlays where there is a greater than 'low' risk. Commercial activities and industrial activities are included within the definition of 'natural hazards potentially sensitive activities'.

Policy 11.2.1.1 requires, in the Hazard 1 (flood) overlay zone, natural hazards sensitive activities and natural hazards potentially sensitive activities are avoided unless:

> The risk from natural hazards is avoided, or is no more than low; and

> The activity has a critical operational need to be located within the Hazard 1 (flood) overlay zone and locating outside is not practicable.

In respect to these matters:

> The Stormwater Assessment (Stantec (2026d)) addresses how the Project is proposing to manage flood risk at the Site; and

> There are a variety of operational needs associated with locating the Project in the proposed location – noting that only part of the Site is located within the Hazard 1 (flood) overlay. These operational needs are addressed earlier in Section 9.3.7 in respect of the NPS-I.

Policy 11.2.4.1 only allows new buildings in Hazard 1, Hazard 1A (not applicable) and Hazard 2 (flood) overlay zones where the scale, location and design of the building or other factors mean risk is avoided or is no more than low. Within the Hazard 1 (flood) overlay zone, outdoor storage is to be designed, managed and located so that:

> Potentially dangerous materials will not be mobilised in a flood; and

> Materials will not obstruct or impede flood water.

Policy 11.2.1.6 addresses natural hazards sensitive activities and natural hazards potentially sensitive activities within Hazard 2 (flood) overlay zone. These activities can only occur where:

> The activity has a critical operational need to locate within the Hazard 2 (flood) Overlay Zone and risk is minimised as far as practicable; or

> The scale, location and design of the activity or other factors mean risk is avoided, or is no more than low.

Policy 11.2.11 requires, in all hazard overlay zones, earthworks (large sale) are only allowed where:

> The risk from natural hazards will be avoided, or is no more than low;

> They will not have adverse effects on land instability nor create, exacerbate, or transfer risk from natural hazards;

> They will not have adverse effects on the stability or buffering capacity of dune systems; and

> They will not obstruct or impede flood water, unless part of approved natural hazard mitigation activities.

Stantec (2026d) considers the risks associated with the Project developing in these flood overlays, concluding that the stormwater management system successfully avoids any increase in downstream flood risk and mitigates onsite flood hazards to an acceptable level.

In respect to hazardous substances, Policy 11.2.1.7 sets out that in Hazard 1, Hazard 1A and Hazard 2 overlay zones, large quantities of hazardous substances are only allowed where they are stored in a manner that ensures risk from natural hazards is avoided or is no more than low. As has been described, these provisions will be addressed in the separate consenting process that addresses the use and storage of hazardous substances.

Policy 11.2.1.14 requires buildings, structures, storage and use of hazardous substances, network utility activities, and earthworks - large scale to be set back an adequate distance from water bodies to ensure that the risk from natural hazards, including from erosion and flooding, is avoided, or is no more than low. The activities associated with the Project are setback from Silver Stream in accordance with Policy 11.2.1.14.

Mana Whenua

There is one objective in section 14 of the District Plan, which seeks that the relationship between mana whenua and the natural environment is maintained or enhanced, including the cultural values and traditions associated with wāhi tupuna, mahika kai, and occupation of original native reserve land through papakāika.[286]

As the policies largely relate to activities within identified wāhi tupuna areas, and the Site is not identified as such, the polices have little relevance to the Project. However, SLPL has committed to ongoing engagement with the Kā Rūnaka and has commissioned a TIA to get a better understanding of Māori interests and cultural values on the Site and surrounding landscapes.

Summary

The Project is consistent with all of the City-wide objectives and policies of the District Plan in Parts A, B and C of the District Plan.

Part D: Management Zones

Rural Zones

The Rural Zone contains the relevant site-specific objectives and policies for this Site. Objective 16.2.1 seeks that rural zones are reserved for productive rural activities and the protection and enhancement of the natural environment, along with certain activities that support the well-being of communities where these activities are most appropriately located in a rural rather than an urban environment.

Pertinently, Policy 16.2.1.8 sets out that commercial activities, industrial activities and major facility activities must be avoided in the rural zone, unless otherwise provided for – given this there is limited direction in this section of the District Plan in respect of the management of large-scale activities such as the Project.

Clearly, the Project is not consistent with the direction to avoid commercial, industrial or major facility activities in the rural zone. However, the FDS clearly signals the use of the Site

[286] District Plan Objective 14.2.1.

for an inland port – contemplating that it would be authorised by way of a plan change. The plan change process would address the conflicts relating to commercial / industrial activities in the rural zone, in that the rural zone provisions would not apply. Notwithstanding this, the technical assessments confirm that the Project can be undertaken in a manner that appropriately manages effects – including in respect of effects on neighbouring rural properties.

Further to these matters, the establishment of an inland port in Dunedin will support rural activities in the region and provide for the export of goods produced as well as the import of materials necessary for that rural production activity. The SLIP therefore supports the wider rural production activities of the Otago Region.

Objective 16.2.2 seeks that the potential for conflict between activities within the rural zones, and between activities within the rural zones and adjoining residential zones, is minimised. The applicable policy sets out that all new buildings and large structures to be located an adequate distance from site boundaries to ensure a good level of amenity for residential activities on adjoining sites.[287] The balance of the policies do not provide a management framework for activities of a similar scale to the Project.

Objective 16.2.3 seeks that the rural character values and amenity of the rural zones are maintained or enhanced, elements of which include:

- A predominance of natural features over human made features;
- A high ratio of open space, low levels of artificial light, and a low density of buildings and structures;
- Buildings that are rural in nature, scale and design, such as barns and sheds;
- A low density of residential activity, which is associated with rural activities;
- A high proportion of land containing farmed animals, pasture, crops, and forestry;
- Extensive areas of indigenous vegetation and habitats for indigenous fauna; and
- Other elements as described in the character descriptions of each rural zone located in Appendix A7.

This objective is implemented by several policies. Policy 16.2.3.1 requires building and structures to be set back from the site boundaries and be of a height that maintains the rural character and visual amenity of the rural zones. Policy 16.2.3.5 provides a framework for larger scale developments in the rural zone – although the activities controlled by the policy

[287] District Plan Policy 16.2.2.3.

do not include industrial activities or major facility areas (given the policy directive to avoid such activities within the rural zones). However, this policy requires adverse effects from large scale development on rural character and visual amenity be avoided or minimised as far as practicable.

Mike Moore Landscape Architect (2026) sets out that while the Project will result in a major change to the Site itself, day-to-day it would most likely be perceived as an extension of the existing industrial character from the west rather than a completely new element with its impacts being perceived as less significant within the wider landscape context. Given the rural zoning of the Site, Mike Moore Landscape Architect (2026) considers that there will be moderate (more than minor) effects of the Project on landscape values.

Ancillary signs are required to be located and designed to maintain rural character and visual amenity. [288] All signage associated with the Project will be carefully placed to avoid any adverse effects on surrounding properties, Site users as well as road users. Ensuring adequate signage is available on the Site is critical to matters of health and safety, directions and operations and all signs will be placed in accordance with the conditions proposed in **Part C** of this Application.

Policy 16.2.3.9 sets out that activities are required to be designed and operated to ensure that any adverse effects from light spill on rural character and amenity, and the ability of people to view the night sky, will be no more than minor. In respect of lighting, Mike Moore Landscape Architect (2026) sets out that the lighting effects associated with the Project will reinforce the extension of the industrial character in an eastward direction.

Objective 16.2.4 seeks that the productivity of rural activities is maintained or enhanced. The subsequent policies set out the following:

- Earthworks in a high-class soils mapped area to retain soils on the Site; [289]
- Only allow activities other than farming on HPL where the scale, size and nature of the activity means that any loss of current or potential future rural productivity would be: [290]
  - Insignificant in any high-class soils mapped area; and
  - No more than minor in other areas of HPL.

[288] District Plan Policy 16.2.3.7.

[289] District Plan Policy 16.2.4.1.

[290] District Plan Policy 16.2.4.2.

In respect to retaining soils on Site, soil will be re-used where appropriate – the exception to this being where soils are contaminated which will need to be disposed offsite or encapsulated onsite.

The District Plan Planning Maps shows that the Site contains high-class soils. AbacusBio Limited (2026) identifies the Site as HPL and determines that the loss of HPL for current or potential future rural productivity would be insignificant due to the permanent long-term constraints of the Site for primary production. These constraints are the location (longer distance for transport of product), poor soil drainage and the risk of flooding which lead to low economic viability for use of the land for primary production for at least 30 years.

Summary

The Project is generally consistent with the applicable provisions of the District Plan. It is acknowledged that there is clear tension between this Project and the directives in the Rural Zone chapter which require the maintenance of rural areas and avoiding land use change – particularly the establishment of commercial / industrial activities. However, there are clear locational benefits to locating an inland port in this location, and also constraints on the land that impact the profits associated with farming activities, that have been discussed throughout this section (in respect of the NPS-HPL, NPS-I and NPS-UD). Again, the FDS clearly signals this location as being appropriate (subject to further investigations that have been undertaken in support of this Application) for an inland port.

9.3.15 Kāi Tahu Ki Otago Natural Resource Management Plan 2005

The Kāi Tahu Ki Otago Natural Resource Management Plan 2005 is relevant to the Project, however SLPL also recognises that it is for tangata whenua to speak to the cultural effects and issues associated with the Project.

The Kāi Tahu Ki Otago Natural Resource Management Plan 2005 is the principal planning document guiding Kāi Tahu ki Otago in the management of natural, physical, and historic resources across the Otago region. The Management Plan acknowledges both the practical use of ORC boundaries and the deeper cultural boundaries that extend beyond them.

Part 3 of the Management Plan details the overall objectives for the Plan (objectives 5.2), these are:

- That Rakātirataka & Kaitiakitaka of Kāi Tahu ki Otago is recognised and supported;
- Ki Uta Ki Tai management is adopted across the region;
- The mana of Kāi Tahu ki Otago is upheld in natural, physical, and historic resource management;

- Effective participation of Kāi Tahu ki Otago in all resource management activities; and
- Mana whenua roles and responsibilities are recognised and provided for throughout the Plan.

SLPL has committed to ongoing engagement with the Kā Rūnaka, and the further details of consultation can be found in Section 5 of this Application. However, in summary, a draft TIA has been prepared by Aukaha which details cultural interests and effects that may occur due to the Project. The delivery of a final TIA is anticipated post lodgement, with the draft TIA to be provided to the EPA once received. Technical advice has been provided for draft technical reports, including stormwater design, freshwater and other infrastructure servicing reports. SLPL is committed to having a relationship with the Kā Rūnaka during the application process, but also as the Project continues.

Wai Freshwater

Objective 5.3 identifies outcomes specific to freshwater. Objective 5.3.3 includes numerous considerations and have been summarised below:

- That spiritual and cultural significance of water to Kāi Tahu ki Otago is recognised in all water management;
- Waters of the Otago catchments are healthy and support Kāi Tahu customs;
- That there is no discharge of human waste directly to water;
- The amount of contaminants entering water (directly or indirectly) are reduced;
- Flow regimes and water quality standards reflect Kāi Tahu cultural values and are implemented region-wide (including lower Waitaki); and
- The issues surrounding water ownership are addressed.

There are no human or other wastewater discharges proposed to Silver Stream or Mills Stream as part of the Project. All human waste, and any industrial waste, is anticipated / proposed to be managed via the Councils reticulation network.

Stormwater will discharge to Silver Stream following treatment in the proposed stormwater management system, and there are numerous protections proposed to ensure any contaminants or waste are captured to avoid discharging them to water. The main risk is during flood events, and even then, the stormwater management design is proposed to adequately manage any effects including stormwater retention and treatment.

Several Wai Māori policies listed under Policy 5.3.4 are relevant to the Project, these have been summarised below:

- To require an assessment of instream values for all activities affecting water;
- To promote the cultural importance of water to Kāi Tahu ki Otago in all water management within the Otago Region;
- To protect and restore the mauri of all water;
- To encourage the use of the Cultural Health Index as a tool for monitoring waterways;
- To oppose any further cross mixing of waters; and
- To promote to the ORC and Environment Canterbury minimum flow levels.

The policies mentioned above, reflect the comments provided in the draft TIA. A Freshwater Assessment has been prepared by E3 Scientific (2026b) (provided by **Part B**) which has concluded any adverse effects on freshwater, and habitats within Silver Stream will be less than minor. The main reason for this is that stormwater will be adequately treated before being discharged into Silver Stream and there will be no adverse effects on the downstream environment. Monitoring of Silver Stream is proposed in **Part C** of this Application to ensure that any changes to water quality during construction and operations are carefully managed.

Discharges

Policy 5.3.4(10) requires all stormwater to be treated before being discharged to water. As mentioned above the proposed stormwater system includes onsite treatment before any water is discharged to Silver Stream. All stormwater from the Site will have first passed through the onsite stormwater treatment system and modelling has been undertaken to ensure stormwater is managed appropriately during different flood event scenarios.

The following discharge policies are also considered relevant:

- To encourage identification of non-point source pollution and mitigate, avoid or remedy adverse effects on Kāi Tahu ki Otago values;
- To encourage Kāi Tahu ki Otago input into the development of monitoring programmes;
- To require monitoring of all discharges be undertaken on a regular basis and all information, including an independent analysis of monitoring results, be made available to Kāi Tahu ki Otago;
- To encourage Management Plans for all discharge activities that detail the procedure for containing spills and including plans for extraordinary events;
- To require all discharge systems be well maintained and regularly serviced. Copies of all service and maintenance records should be available to Kāi Tahu ki Otago upon request;

- To require re-vegetation with locally sourced indigenous plants for all disturbed areas. Re-vegetation should be monitored by an assessment of the vegetative cover at one growing season after establishment and again at three seasons from establishment; and
- To require visible signage informing people of the discharge area; such signs are to be written in Māori as well as English.

The proposed conditions for the SLIP (**Part C**) include provisions where the Kā Rūnaka is able to be involved with the implementation of monitoring and reporting associated with the SLIP, as well as in relation to the implementation of other effects management measures. As mentioned throughout this Application, SLPL is committed to an ongoing relationship with the Kā Rūnaka and ensuring that information is transparently shared and any events that affect Silver Stream are addressed accordingly.

There is planting proposed on the bank of Silver Stream to enhance biodiversity and provide screening from the Stream. This aligns with Policy 5.3.4(17).

Summary

It is considered that the Project aligns with the policies related to discharge to water.

River and Instream Works

Policies 5.3.4(31), 5.3.4(32) and 5.3.4(33) all relate to fish passage and ensuring that there are no adverse effects generated on fish passage due to instream works. These policies also require instream works to be avoided during the months of August to April and that appropriate buffer zones are provided for between flowing water and the site of any instream works. Further, Policy 5.3.4(39) seeks that all works undertaken in streams are done when the water level is low or naturally dry.

The Project has been designed in a way that reduces the need for works in Silver Stream to avoid and mitigate any adverse effects. As detailed by Stantec (2026d), there are two stormwater spillways proposed on the banks of Silver Stream (but no culverts, weirs or dams), and also the potential for slope stabilisation works to occur along the stream bank. The most suitable time for the works to occur is during dry weather when stream flows are low, which may be during August to April. The undertaking of works in dry conditions and the implementation of a buffer between any flowing water and the works area will contribute to minimising any adverse effects on the stream.

Policy 5.3.4(34) seeks that any instream works do not generate any adverse effects. As mentioned above, the works in Silver Stream include the installation of two spillway structures and potential slope stabilisation activities that will occur during dry conditions.

Also, considering Policy 5.3.4(41) and Policy 5.3.4(42), any equipment utilised during the instream works will be removed immediately after works are completed. During construction and operation of the Project, adequate onsite management measures will be in place to ensure sediment and contaminants do not enter Silver Stream. This aligns with the outcomes sought in Policy 5.3.4(37) and Policy 5.3.4(38). A proposed Erosion and Sediment Control Plan will provide the details on how to adequately avoid sediment and contaminants entering Silver Stream.

Summary

It is considered that the Project aligns with the policies related to river and instream works.

Bank Erosion

Policies 5.3.4(43) to 5.3.4(45) relate to discouraging and opposing activities that could cause or increase bank erosion. Kāi Tahu seek to ensure banks are stable and any works do not discharge sediment or other discharges into any waterways. The proposed conditions of consent require SLPL to undertake slope stability investigations along that part of the Silver Stream bank located within the Site, and then to complete any stabilisation works in the instance that any instability is confirmed. These works would be undertaken in accordance with best practice erosion and sediment control measures, resulting in a strengthen bank which will minimise any gradual discharge of sediment from the bank into the stream.

Land Use and Management

The following policies are considered relevant to the Project:

> To promote land use that suits the type of land and climatic conditions;[291]

> To oppose the draining of wetlands, all wetlands are to be protected; [292]

> To promote integrated riparian management throughout entire catchments; and [293]

> To oppose the indiscriminate use of chemicals or poisons in or near waterways.[294]

[291] Policy 5.3.4(54) of the Kāi Tahu Management Plan.

[292] Policy 5.3.4(56) of the Kāi Tahu Management Plan.

[293] Policy 5.3.4(58) of the Kāi Tahu Management Plan.

[294] Policy 5.3.4(59) of the Kāi Tahu Management Plan.

It is considered that the Project will align with the policies listed above. All engineering designs on the Site have included consideration about flood hazard risks to ensure there are no adverse effects generated on Silver Stream and surrounding properties. There are no discharges of contaminants proposed and all stormwater on the Site will be adequately treated before being discharged to Silver Stream. Further to these points, planting will be undertaken on the bank of Silver Stream for visual screening and biodiversity enhancement.

There are no wetlands identified within the Site or the receiving environment (Silver Stream) for any external works or discharges.

Summary

For the matters listed above, it is considered that the Project aligns with all of the land use and management policies.

Wāhi Tapu

The overarching objectives relating to wāhi tapu are detailed in Objective 5.4.3, and they include:

> All wāhi tapu are protected from inappropriate activities;

> Kāi Tahu ki Otago have access to wāhi tapu; and

> Wāhi tapu throughout the Otago region are protected in a culturally appropriate way.

There are no wāhi tapu sites mapped in the District Plan located within the site boundaries. However, the draft TIA recognises that areas of significance go beyond the Site. It is considered that the Project aligns with this objective.

Policy 5.4.4(1) details that consultation with Kāi Tahu ki Otago is required for all activities that could impact wāhi tapu. Policy 5.4.4(2) goes further detailing how processes and engagement with appropriate agencies should look. SLPL is committed to engagement with the Kā Rūnaka and has supported the preparation of a TIA to gain better understanding on cultural interests and values that could be impacted by the Project.

Earth Disturbance

The policies listed under earth disturbance apply to sites where wāhi tapu may be present. These policies include ensuring an archaeologist is onsite during earthworks,[295] that

[295] Policy 5.4.4(4) of the Kāi Tahu Management Plan.

accidental discovery protocols are utilised[296] and that all Māori archaeology is cultural property of Kāi Tahu ki Otago.[297]

As mentioned previously, there are no sites of significance to Māori identified in the District Plan within the boundaries of the Site. However, SLPL has proposed conditions which are included in **Part C** of this Application to ensure that adequate cultural values are considered during construction, and earthworks. It is considered that the Project aligns with these policies.

Discharges

The policy seeks that Kāi Tahu discourage all discharges near wāhi tapu.[298] There are no District Plan identified wāhi tapu sites near the discharge locations in Silver Stream, but SLPL acknowledge there could be wāhi tapu impacts further downstream. SLPL will continue to work alongside Kāi Tahu and the Kā Rūnaka to ensure any adverse effects are managed accordingly.

Kāi Tahu ki Otago Resource Inventory

Policies 5.4.4(11) and 5.4.4(12) relates to the protection of wāhi tapu and detailing that legal action shall be taken against anyone who damages wāhi tapu. SLPL has proposed conditions in **Part C** of this Application that seek to provide appropriate protection to unidentified wāhi tapu. Therefore, it is considered that the Project aligns with these policies.

Mahika Kai and Biodiversity

Policies 5.5.4(1), 5.5.4(12) and 5.5.4(18) seek to prioritise catchment-wide approaches (Ki Uta Ki Tai), wetland protection and restoration, and best-practice maintenance of drains and waterways to uphold ecosystem health.

All works and engineering designs of the Project have included protections of Silver Stream. All stormwater will be adequately treated before being discharged into the stream, stormwater management devices will be installed in the internal stormwater networks to ensure no litter or contaminants enter the stream and planting on the bank of the stream is proposed for screening and biodiversity purposes. It is considered that the SLIP aligns with the listed policies.

Policies 5.5.4(3). 5.5.4(8), 5.5.4(9) and 5.5.4(15) promote research, safeguard remaining indigenous fish habitats, prevent introduction of exotic species, improve fish passage,

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[296] Policy 5.4.4(5) of the Kāi Tahu Management Plan.

[297] Policy 5.4.4(6) of the Kāi Tahu Management Plan.

[298] Policy 5.4.4(7) of the Kāi Tahu Management Plan.

remove exotics where appropriate, and restore lost species and breeding stocks important to Kāi Tahu.

As mentioned above, fish passage has carefully been considered as well as freshwater ecosystems. The Freshwater Assessment undertaken by E3 Scientific (2026b) concluded that any effects on freshwater ecosystems would be low to very low.

Another policy directive is that Kāi Tahu seeks to ensure participation in resource management, protect access to mahika kai sites, require assessment of effects on mahika kai, support proper authorisation systems for cultural materials, and encourage the creation of mahika kai parks.[299]

The Project aligns with these policies, particularly through the engagement outlined in Section 6. The draft TIA provides information that aligns with the other listed policies and identifies potential impacts on mahika kai and cultural materials.

Policies 5.5.4(10) and 5.5.4(13) emphasise safeguarding mātauranga, promoting cultural monitoring tools, and ensuring knowledge is passed to future generations. Although this does not directly relate to the Project, SLPL is open to cultural monitoring techniques particularly in relation to water management.

Policies 5.5.4(2). 5.5.4(16) and 5.5.4(17) seek for stronger rule considerations, ensuring hazardous substances do not impact mahika kai and ensuring aquatic life is protected. SLPL is wanting to ensure water quality in Silver Stream does not worsen and the Freshwater Assessment (E3 Scientific (2026b)) has concluded that any effects on freshwater and ecosystems will be low or very low.

Genetic Modification

Policy 5.5.4(22) promotes the active containment and eradication of pests and weeds to protect indigenous biodiversity and ecosystem health. This policy direction emphasises the need for environmental management practices that minimise ecological risks and support the maintenance and enhancement of natural systems.

The Project relies on engineering solutions to ensure stormwater is appropriately managed, with any flooding on the Site impacting the Site to an acceptable level only, and not Silver Stream or surrounding properties. One of the primary quality control measures that is in place, is that the proposed engineering systems rely on more than one system. Meaning, if

[299] Policies (5.5.4(4)–(7), 5.5.4(11), 5.5.4(14) of the Kāi Tahu Management Plan.

one of the stormwater systems were to fail, there would be additional systems to remove contaminants or litter from the stormwater.

Further to this, there are monitoring controls put in place, both as proposed management plans and proposed conditions of this Application. These controls ensure that any issues will be monitored and resolved as required.

Pest Control and Management

Policy 5.5.4(23) requires that all pest management activities include monitoring of both the control methods used and their effects on indigenous species, ensuring pest strategies are environmentally responsible, while Policy 5.5.4(24) opposes the indiscriminate use of chemicals or poisons near mahika kai sites, directing that pest control methods avoid contaminating or adversely affecting culturally significant food-gathering areas.

The implementation of biosecurity measures is proposed within the consent conditions to ensure pest management is being adequately undertaken. No chemicals or poisons will be used near any identified sites used for mahika kai. All discharge of water to water will be treated appropriately and will have no adverse effects on mahika kai.

Cultural Landscapes

Policy 5.6.4 outlines policies for cultural landscapes. Those of relevance to the Project include 5.6.4(1) which sets to identify and protect landscape features significant to Kāi Tahu ki Otago and Policy 5.6.4(4) to ensure interpretation of Kāi Tahu ki Otago histories for public or commercial reasons are undertaken by the appropriate Rūnaka / whānau.

A draft TIA has been prepared which identifies the significant landscapes within the area, none of which are located within or adjacent to the Site. It is considered that the Project aligns with these policies.

Policy 5.6.4(7) seeks to encourage and promote the importance of traditional place names. An example of how this has been implemented during this Application process is through changing all references (excluding legal names) from Taieri to Taiari. SLPL made a commitment to incorporate the traditional place names within these application documents.

Statutory acknowledgement considerations are set out in Policy 5.6.4(14) - Policy 5.6.4(15) and ensuring these acknowledgments are promoted by Kāi Tahu ki Otago and included in Local Government Plans. As mentioned in Section 3 of this Application, there are no statutory acknowledgements within the Site.

Policy 5.6.4(19) requires all earthworks, excavation, filling or the disposal of excavated material to:

> Avoid adverse impacts on significant natural landforms and areas of indigenous vegetation;

> Avoid, remedy, or mitigate soil instability; and accelerated erosion; and

> Mitigate all remaining adverse effects.

Further, Policy 5.6.4(20) requires an accidental discovery protocol for all road alignments and widening as well as ensuring that any sediment runoff from road construction. An Archaeological Authority has been obtained for the Site, and accidental discovery protocols will be imposed via this authority approval and in accordance with proposed conditions. Policy 5.6.4(21) seeks that all indigenous re-vegetation uses local sources specific for all disturbed areas.

As outlined in Section 2 of this Application, earthworks are required during the construction stages of the Project. Any actual or potential adverse effects associated with earthworks will be managed appropriately. Out of 36 vegetation species identified on the Site, 32 of the species were identified as being exotic and E3 Scientific (2026a) concluded any effect on indigenous biodiversity is low to very low. An Erosion and Sediment Control Plan will be developed to ensure erosion and sediment are adequately managed during construction and any road widening activities and no adverse effects are generated.

Policy 5.6.4(24) aims to discourage both temporary and permanent structure, in culturally significant landscapes, lakes, rivers or the coastal environment. There are two spillway structures proposed in the bed of the Silver Stream to allow for controlled, treated stormwater discharge to the stream, and potential slope stability activities required. The Silver Stream is not listed as a statutory acknowledgement or listed in the District Plan are having significant cultural values and it is considered that the Project aligns with the policy.

Summary

It is considered that the Project aligns with the policies related to Mahika Kai and Biodiversity**.**

Air and Atmosphere

Objectives 5.7.2 detail Kāi Tahu ki Otago's intends to:

> Protect sites of significance from odour, visual and other pollutants;

> Be meaningfully involved in the management and protection of the air resource; and

> The life supporting capacity and mauri of air is maintained for future generations.

The Project aligns with these objectives, specifically through ongoing engagement with local mana whenua (as outlined in Section 5), a reduction in greenhouse gas emissions, and the Project is an industrial activity that does not discharge contaminants into the air.

There are several policies listed under Policies 5.7.3; however, those that are considered relevant to the Project are:

> To require earthworks and discharges to air consider the impact of dust and other air-borne contaminants on health, mahika kai, cultural landscapes, indigenous flora and fauna, wāhi tapu and taoka; [300] and

> To encourage reduced vehicle emissions.[301]

As mentioned above, all earthwork effects will be managed through a CMP (which is to be prepared in accordance with the draft CMP provided in **Part D**) which is to include an Erosion and Sediment Control Plan (one for each development stage) to ensure there will be no adverse effects on Silver Stream, health or indigenous flora and fauna that may be present within, or adjacent to the Site.

The SLIP will significantly reduce vehicle emissions by shifting around 30,000 truck movements per year from road to rail. This mode shift is expected to cut 1,050–1,100 tonnes of CO_2e annually across affected supply chains and reduce harmful pollutants by around 70%. Fewer heavy vehicles on urban and state highway routes also supports improved air quality and public health.

Summary

It is considered that the Project aligns with the policies related to atmosphere and air.

Summary

Taking into account the draft TIA, it is considered that the Project aligns with the objectives and policies outlined in the Kāi Tahu Management Plan. SLPL has committed to ongoing engagement with mana whenua, and seek to protect the freshwater quality and ecosystems in Silver Stream and reduce vehicle emissions.

[300] Policy 5.7.3(1) of the Kāi Tahu Management Plan.

[301] Policy 5.7.3(4) of the Kāi Tahu Management Plan.

9.3.16 Treaty Settlements

Overview

Clause 5 (i) of Schedule 5 of the Act requires the applicant to include information about any Treaty settlements[302] that apply in the area covered by the consent application, including

> Identification of the relevant provisions in those Treaty settlements; and

> A summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area.

The following sections address these matters. The section 18 report prepared under section 18 of the Act, for the referral application for this Project, has been taken into account in preparing this section of the application.

Ngāi Tahu Claims Settlement Act 1998

The Ngāi Tahu Deed of Settlement was signed on 21 November 1997, and the Ngāi Tahu Claims Settlement Act was passed on 29 September 1998.

Under the Te Rūnanga o Ngāi Tahu Act 1996, the legislation affirms important aspects of Ngāi Tahu Whānui tikaka, including that Te Rūnanga o Ngāi Tahu is recognised for all purposes as the representative of Ngāi Tahu Whānui. Ngāi Tahu Whānui is defined as the collective of individuals who descend from the primary Kāi Tahu hapū of Waitaha, Ngāti Māmoe, and Ngāi Tahu, including Kāti Kuri, Kāti Irakehu, Kāti Huirapa, Ngāi Tūāhuriri, and Kāi Te Ruahikihiki.

There are no specific provisions in the Settlement Act that relate specifically to the Project or the Site. There are no redress provisions identified that affect natural and physical resources relevant to the Project or Site.

9.4 SUMMARY

In summary, the information provided in the preceding sections satisfies the information requirements for approvals required under the RMA, in accordance with Schedule 5 of the Act.

[302] Under Section 4 (Interpretation) of the Act, a treaty settlement means a Treaty Settlement Act or Treaty Settlement Deed.

10. CONCLUSION

SLPL is seeking resource consent under the FTAA to enable the construction, use and operation of the SLIP.

10.1 MEETING THE PURPOSE OF THE ACT

The purpose of the Act is:

> *to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.*

The suite of robust technical assessments prepared to support the Application demonstrate that the SLIP will undoubtedly facilitate the delivery of essential infrastructure that will have significant regional and national benefits. These benefits have been quantified by Savvy Consulting (2026) as summarised in Section 6.3 of this report, and provided in **Part B**. The Project will:

- Generate approximately $147.8 million $191.3 million) in value added impacts (including indirect and induced impacts) over the 10 years of construction;
- Sustain 1,489 FTE jobs nationally during the 10-year construction period;
- Create 21 transferred positions and add 104 net high-value permanent jobs during operation;
- Enable growth in export volumes and market share beyond current facility capacity while supporting primary sector exports in Otago, Southland and South Canterbury;
- Increase utilisation of existing rolling stock and track assets, with an initial uplift of 15,000 (30,000 TEU) and projected growth up to 40,000 wagons per annum expected;
- Reduce heavy vehicle movements on urban Dunedin roads and State Highways (approximately 29,860 per annum) as the SLIP rail operations increase, which will lead to significant road maintenance cost savings and improved transport efficiency;
- Reduce greenhouse gas emissions, in the order of 1,050-1,100 tonnes per annum, and generate associated improvements to air quality; and
- Improve supply chain resilience through multi-modal accessibility and reduced reliance on vulnerable road transport routes delivering an enhanced competitiveness for Port Otago.

The proposed SLIP, as regionally significant infrastructure, will enable a range of employment, economic, infrastructure, supply chain, natural hazard resilience and reduced

greenhouse gas emissions benefits. The Project is of such a scale that its net-economic benefits will extend beyond the Otago Region to New Zealand as a whole, demonstrably achieving the purpose of the Act.

10.2 MANAGING THE EFFECTS OF THE PROJECT

The environmental effects of the Project are well defined and can, and will be, readily managed. An assessment of the actual and potential effects on the environment resulting from the construction, use, and operation of the SLIP is provided in Section 6 of this Application, as well as in the various technical assessments commissioned by SLPL (provided in **Part B**). The proposed conditions of consent provided in **Part C** are considered to appropriately manage the identified effects.

The actual and potential effects of the SLIP have been subject to detailed scrutiny from a range of leading technical experts. Through that process, and with input from local authorities and a selection of stakeholders, the Project has been refined to minimise adverse effects on the environment, and to maximise positive effects. All of the environmental effects are considered to be minor or less than minor, with the exception of landscape and visual effects, which are identified as moderate, not significant.

While the landscape and visual effects are identified as moderate, the Site is not located within a section 6 landscape and has limited amenity value under section 7 of the RMA. The overall effect, which does not result in a significant effect status under Te Tangi a Te Manu, largely relates to the Site changing from its existing rural character to an industrial character. Conditions are proposed in **Part C** to manage this effect.

Mitigation measures are included in the Application to address those effects resulting from the SLIP.

Ongoing engagement between SLPL and mana whenua has occurred, and will continue to occur, in relation to obtaining a clear understanding of Te Rūnanga o Ōtākou's cultural values associated with the Site, and with regard to understanding effects on cultural values resulting from the proposed activities and identifying ways in which such effects can be avoided, remedied, or mitigated. A draft TIA was shared with SLPL by the Kā Rūnaka during consultation, which has provided useful indication of cultural values and anticipated cultural effects of the Project, however at the time of the lodgement of this Application a finalised version of the TIA has not been provided by the Kā Rūnaka. SLPL and relevant technical experts have however taken it into account, and SLPL is working with the Kā Rūnaka to provide the necessary information to allow the TIA to be finalised. At such time when the TIA is provided by the Kā Rūnaka, it will be shared with the Panel appointed.

10.3 ALIGNMENT WITH THE STATUTORY FRAMEWORK

As noted above, the SLIP will undoubtedly facilitate the delivery of essential infrastructure that will have significant regional and national benefits and is therefore in accordance with the purpose of the Act. The SLIP generally aligns with the policy imperatives specified in the relevant national, regional and district planning documents, as set out in detail in Sections 8 and 9 of this Application.

A significant amount of work and effort has gone into responsibly addressing the actual and potential adverse effects of the SLIP, including through the preparation and identification of appropriate management measures (the subject of proposed consent conditions). As a result of the implementation of these measures, the environmental effects of the SLIP will be appropriately managed. Given the finding there is no significant effects / impacts, they will not be out of proportion to the benefits of the Project.

10.4 CONSULTATION

SLPL has consulted extensively with mana whenua, interested / potentially affected parties, and the relevant regulatory authorities. This consultation has informed the various assessments provided as part of this Application and will continue throughout the FTAA decision-making process and during the subsequent construction and operation of the SLIP.

10.5 CONCLUDING STATEMENT

SLPL is pleased to present and seek approval for an innovative project that will deliver key infrastructure with significant regional and national benefits, while effectively and robustly managing environmental effects.

SLPL looks forward to working through the post lodgement phase of the FTAA application process with a view to securing approval for the construction, use, and operation of the SLIP in accordance with a set of workable and appropriate consent conditions.