

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Southern Link Inland Port
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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
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2. Please provide your comments on this application
Please see following pages

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manager's signoff



Alan Worthington

Resource Consents Manager

Date: 1 July 2025

The invitation to provide written comments on the Southern Link Inland Port referral application includes three questions, as detailed below.

Question 1:

Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please also confirm this in writing.

The Dunedin City Council is unaware of any such applications.

Question 2:

In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please also confirm this in writing.

There are no existing resource consents where Section 124C(1)(c) or Section 165ZI of the RMA apply.

In terms of the resource consent history for the the subject sites, the only resource consent decision of note is a joint Otago Regional Council / Dunedin City Council decision issued in March 2003, authorising the establishment of a timber processing plant for City Forests Limited at 270 Dukes Road North. This decision was subsequently appealed, and overturned in an Environment Court decision dated January 2004 (refer *Guardians of North Taieri Inc v Dunedin City Council C004/2004 [2004] NZEnvC 23*). The issues canvassed in this decision are of some relevance to the current proposal. City Forests subsequently sold the property in January 2009.

There are no other current or previous resource consent applications for the subject properties (i.e. 270, 274 and 292 Dukes Road North).

Questions 3:

Whether the project may deliver significant regional or national benefits (refer to section 22 of the Act for the criteria for assessing referral applications). Additionally, and in this context, provide any high-level commentary regarding the project's alignment with relevant district/city plans, policies, and/or strategies.

Alignment with Relevant District Plans, Policies, and/or Strategies.

Partially Operative Second Generation District Plan 2024 ("2GP")

The subject sites are zoned Taieri Plain Rural, and the proposed inland port is defined in the 2GP as a Major Facilities: Port activity. Port activities are a non-complying activity in the Taieri Plan Rural Zone (refer 2GP Rule 16.3.3.61). In terms of the 2GP policy framework, the key 2GP policy in this instance is the directive Policy 16.2.1.8, which states:

Avoid supported living facilities, commercial activities, industrial activities, and major facility activities, unless otherwise provided for, in the rural zones.

The proposed inland port is contrary to this policy, and should the referral application be unsuccessful, it is anticipated that the proposal would be the subject of an application for a notice of requirement or a plan change.

Rautaki Whakawhanake Ā-Mua o Ōtepoti: Dunedin Future Development Strategy 2024-2054 (“FDS”)

As noted in the referral application, the FDS identifies the investigation and establishment of an inland freight hub at 270 Dukes Road North as a response to transport infrastructure capacity limitations. The FDS notes that freight transport is a significant issue for Dunedin; and that increasing the proportion of freight moved by rail would have significant benefits in terms of efficiency, reduced carbon emissions, road safety and amenity. It envisaged further investigations with support from stakeholders (including Waka Kotahi NZTA, KiwiRail, DCC, ORC, Port Otago, and freight logistics operators) to determine whether the indicative site is appropriate. The FDS (which was finalised before the Fast-track Approvals Act came into force) appears to envisage that this would require a district plan change, observing “*if it proceeds to the approvals stage it will require site specific zoning provisions that focus solely on warehousing and goods storage and movements.*”

The FDS document is available here:

https://www.dunedin.govt.nz/__data/assets/pdf_file/0007/1049299/Future-Development-Strategy-2024-54.pdf

Zero Carbon Plan 2030

The Dunedin City Council *Zero Carbon Plan 2030* has identified moving freight to low emissions modes as a key action area, noting:

Transporting goods by rail generates about a quarter of the emissions as long-haul trucking, and over 100 times fewer emissions than air freight.

The plan identifies an inland port to enable the transfer of logs by train as a constituent element of this action area.

The Zero Carbon Plan is available here:

https://www.dunedin.govt.nz/__data/assets/pdf_file/0011/992873/zero-carbon-plan-2030.pdf

Mosgiel Transport Study

The Mosgiel Transport study has just begun, and will be looking holistically at the Mosgiel transport network to identify current issues, and constraints to growth. The study will build on the work undertaken during development of the *Future Development Strategy*, noting that the FDS has identified that there is a rapidly growing industrial area in Mosgiel, including the proposed inland port.

It is anticipated that the study will identify projects/programmes of work that will be put forward for inclusion in the 2027 Ten year Plan. The DCC will be working closely with Waka Kotahi NZTA, who are hoping to prepare a business case for options to optimise the SH 1/87 intersection.

Summary

In terms of Section 22(2)((a)(i) of the Fast Track Approvals Act, the proposed inland port is a non-complying activity and contrary to the key relevant policy of the 2GP. The proposal has however been envisaged and referenced in other significant DCC strategies and policies, including the FDS, the Zero Carbon Policy 2030 and preliminary work undertaken in respect of the Mosgiel Transport Study.

Other

The Dunedin City Council's preliminary feedback on the proposal is included with the referral application (see Appendix 7 of the application). Should the referral application be accepted, the Dunedin City Council would appreciate the opportunity to expand on this feedback and provide comment on the substantive application.

Prepared by



Karen Bain

Associate Senior Planner

Approved by



Alan Worthington

Resource Consents Manager

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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
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2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Thank you for your invitation to provide written comments on the application for referral of the Southern Link Inland Port project under the Fast-track Approvals Act 2024.

As the applicant is a company owned by Port Otago Limited which in turn is majority owned by Otago Regional Council, an external independent assessment panel has been established to review the application. This panel includes experts in the fields of policy, consenting, science, engineering and hazards. Internal compliance, strategy and transport teams have been used to provide comments as the required expertise or operational knowledge is held internally. These comments have been reviewed by two staff members.

Please see below comments on this application.

Competing Applications

- Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please also confirm this in writing.**

There are no competing applications to undertake works on the site.

- 2. In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please also confirm this in writing.**

There are no such consents to undertake works on the site. The Silver Stream is located to the south of the site and is part of the Taieri River catchment which is fully allocated. The applicant will need to ensure that the project does not affect the allocation of the Silver Stream.

Specific matters to address

- 1. Are there any reasons it would be more appropriate for the project to proceed through existing RMA processes rather than the processes under the Act?**

There is no reason, from a Regional Council perspective, why this application could not go through the standard RMA consent process within statutory timeframes. However, ORC have no issues with this proceeding as a Fast-Track application.

- 2. Does the applicant or a company owned by the applicant, have any environmental regulatory compliance history in your council's area?**

Port Otago Limited (who owns the applicant) possess 41 consents granted by the Otago Regional Council. 20 of which are Coastal Marine Area Use Permits, 5 Coastal Discharge Permits, 2 Discharge to Air Permits, 1 Discharge to Land Permit, 1 Coastal Water and 11 General/Structure Land Use Permits.

Port Otago Limited have solely received Performance Monitoring and Audit compliance grades of Full Compliance or Low Risk Non-Compliance. No Moderate Non-Compliance or Significant Non-Compliance grades have been assigned over the course of the exercise of the 41 consents. No enforcement action has been taken related to any breaches of Port Otago Limited consents.

From 2015, 7 incidents had been investigated relating to Port Otago Limited and Port Otago Harbour Control, most of which were self-reported and related to discharges within the harbour of privately-owned vessels. None of these 7 incidents resulted in enforcement action taken.

- 3. Does the project, from council's perspective, involve any activity classified as a prohibited activity under the RMA?**

No prohibited activities have been identified. However, the applicant will need to ensure the proposed activities do not affect the allocation of the Silver Stream, nor compromise Council's Flood Management Scheme. Bylaw Approval may be required under the Flood Protection Management Bylaw 2022.

- 4. Would the project have any significant adverse effects on the environment?**

The referral application does not include detailed plans of the works, or technical reports which address specific effects. The comments below outline what will be needed as a minimum to be

included to address any potential adverse effects on the environment. All independent reviews are attached as Appendices 1 to 5.

4.1 Ecological matters

Beca, on behalf of the Otago Regional Council have recommended the following information be provided for any substantive application to address ecological matters:

“It is recommended that a comprehensive Ecological Impact Assessment is prepared in accordance with the EIANZ guidelines for the substantive application. This should be prepared by a suitably qualified ecologist and include an assessment of the potential and actual effects of the proposal on freshwater and terrestrial features within the site and receiving environment. Site investigations to ground-truth ecological features will be required to accurately describe ecological value and appropriately assess potential impacts of the proposal.

The application may include the discharge of stormwater to the Silver Stream, which is considered to provide significant habitat for Threatened and At Risk native freshwater fish upstream of Wingatui Road and holds a high degree of naturalness and cultural value. Therefore, the EclA should also include an assessment of the ecological effects of the proposal on the receiving environment, such as stormwater discharge on the Silver Stream, along with appropriate mitigation measures to manage adverse effects (if required).

It is assumed that removal of terrestrial vegetation within the site will also be required. Therefore, the impact assessment should consider the value of the vegetation proposed for removal and any potential adverse effects associated with this activity on native fauna that may be present (i.e. bats, birds, lizards).”

4.2 Hydrogeological matters

Beca, on behalf of the Otago Regional Council have recommended the following information be provided for any substantive application to address hydrogeological matters:

4.2.1 Dewatering Assessment

The groundwater table underneath the proposed site may be less than 2m below ground level (m BGL) based on available information in the area. As a result, temporary dewatering is likely to be required to lower the groundwater table within excavation(s) to a suitable level for construction to take place. It should be noted that the site lies within a Groundwater Protection Zone. At a minimum, the dewatering assessment should consider:

- *Depth of dewatering required.*
- *Duration of dewatering required.*
- *Flow rates required, both peak flows and stabilised flows.*
- *Total groundwater abstraction volumes.*
- *Dewatering methodology.*
- *Number of bores required and associated land use effects.*
- *Management for discharge of abstracted groundwater, including discharge water quality.*
- *Potential effects on neighbouring groundwater users.*
- *Potential effects on neighbouring structures.*
- *Potential effects on the environment, particularly if the site contains contaminated land.*

4.2.2 Settlement Assessment

Dewatering can lead to ground settlement; hence an assessment of settlement risk should be undertaken in conjunction with the above dewatering assessment and should include a suitable methodology to mitigate settlement risk.

4.2.3 Flood Protection Bund Design Assessment

The proposed site sits on the Taieri Plain, which is a large, low-lying, near-flat floodplain containing the Taieri and Waipori Rivers. The site is therefore likely going to require a flood-protection bund to protect it against future flood events. A hydrogeological assessment of the bund design and toe drain is recommended to assess the suitability of the design and materials. The drainage system may intercept groundwater and requires the volume of abstraction, frequency and hydraulic connection to the stream/river to be further assessed. Any associated water quality effects should also be considered, particularly if there is potential for migration of contaminants in the drainage system.

4.2.4 Consumptive Groundwater Takes for the Facility

The site lies over the East Lower Taieri Aquifer which currently has allocation available. If any groundwater takes are planned for water supply use at the facility, this will require a consent to construct a groundwater bore and take and use the water which will likely require an Assessment of Environmental Effects (AEE)."

4.3 Engineering and Natural Hazard matters

Morphum Environmental, on behalf of the Otago Regional Council have recommended the following information be provided for any substantive application to address engineering and natural hazard matters:

- *"A 100-year ARI flood assessment report, including a demonstration that there is no increase in adverse effects on upstream or downstream properties, assessment of any flood volume displacement, effects on the operation of the existing Taieri Drainage Scheme, hazard risk assessment and any mitigation measures proposed.*
- *The site is located adjacent to a Scheduled Drain S3 asset owned and managed by ORC. The Flood Protection Management Bylaw requires approval from ORC for works near a scheduled asset. An assessment should be provided demonstrating that the proposed works will not adversely affect the scheduled flood protection drainage.*
- *A comprehensive Stormwater Management Plan and details for proposed onsite stormwater management device(s), including measures to manage stormwater quantity and attenuate peak discharges where appropriate, in line with regional plan requirements."*

5. Would the project, from council's perspective, have significant regional benefits?

The Regional Policy Statement (RPS) provides a framework for achieving long-term environmental sustainability by integrating the protection, restoration, enhancement, use, and development of Otago's natural and physical resources.

The RPS also seeks to provide mana whenua and communities with opportunities to carry out activities that support their economic, cultural, and social needs, while recognizing that a thriving and healthy environment is essential to sustaining well-being.

We believe this project has the potential to deliver significant regional benefits, provided that environmental sustainability is balanced with economic, cultural, and social considerations.

6. Policy comments

Incite, on behalf of the Otago Regional Council have provided comments from a policy perspective, these are summarised below.

6.1 Otago Regional Policy Statements

The referral application does not contain a detailed assessment of the project against the relevant provisions of either the Otago Regional Policy Statement 2019 (ORPS) or the Proposed Otago Regional Policy Statement 2021 (pORPS). This assessment is required within the substantive application.

It is noted that the proposed activity does not appear to meet the description or definition of “nationally significant infrastructure” or “regionally significant infrastructure within the ORPS. However, it appears the activity will meet the definition of “Infrastructure” within the pORPS, which includes:

(h) facilities for the loading or unloading of cargo or passengers transported on land by any means.

Where an activity meets the definition of “nationally significant infrastructure” or “regionally significant infrastructure”, both the ORPS and pORPS apply a separate effects management hierarchy. Given that the proposed activity does not appear to be located within a sensitive environment, meeting one of these definitions is not expected to materially affect the assessment of the application under the ORPS or pRPS.

Based on the information provided within the referral application, the assessment of the ORPS and pORPS should have a particular focus on the provisions of these documents that relate to:

- *Freshwater, including provisions related to preserving and restoring natural character and instream values, stormwater and industrial and trade waste discharges;*
- *Discharges to air;*
- *Soil values, including provisions related to soil quality, soil erosion, and highly productive land;*
- *Development in rural areas;*
- *Ecosystems and indigenous biological diversity, including provisions related to restoration and enhancement;*
- *Natural hazards, including provisions related to natural hazard mitigation and hard protection structures;*
- *Provision of infrastructure, including provisions related to the transport system; and*
- *Contaminated land (if applicable).*

As noted in section 4, the application site is located within a flood hazard area. The referral application states that the activity has been designed in a way to ensure floodwaters can be effectively managed, without increasing flood risk on surrounding land or impacting the operation of the ORC’s flood management infrastructure. The substantive application should include details of the proposed

flood management approach along with an assessment of the relevant natural hazard provisions in the ORPS and the pORPS.

The site is located within an area that meets the definition of “highly productive land”. A high-level assessment of the NPS-HPL has been provided. For the substantive application however, a detailed assessment of the NPS-HPL, with the provisions of the pORPS and ORPS related to highly productive land, significant soils and development within the rural area should be provided.

6.2 Otago Southland Regional Land Transport Plan 2021-2031 (RLTP).

The direction set out in the RLTP supports the outcomes that the application is intended to deliver. The RLTP places strong emphasis on moving freight by rail rather than on trucks, reducing freight-related emissions, and improving the resilience and efficiency of regional supply chains. In particular, the RLTP states:

“To further increase opportunities for freight on rail, the combined RTCs favour an inland port located between Dunedin and Balclutha. A primary user of this inland port is likely to be the forestry sector, which has estimated that 50,000 tonnes of logs could be transferred to rail.

The successful development of an inland port requires comprehensive planning, robust infrastructure and transport connections. Careful consideration of the potential impacts on surrounding communities and the environment from freight movements to and from the port are also critical.

To be most effective, this type of investment would also need to address resilience issues on the Taieri Plains that arise from flooding. The current Gore main line rail bridge restricts the flow of the Mataura River during flood events and is at risk of significant damage. The RTC currently advocates for upgrades to this bridge as a matter of urgency.”

Given the above, the proposed development of an inland port in this location is considered consistent with the direction within the RLTP provided the potential impacts listed within the RLTP can be resolved.

7. Consents comments

Incite, on behalf of the Otago Regional Council have provided comments from a consenting perspective, these are summarised below.

7.1 Water Plan

Based on the information provided, the following activities may require resource consent under the Water Plan:

Discharge of water (stormwater):

- The discharge of stormwater to the Silverstream is proposed within the application. If the activity cannot meet the permitted activity rules within Rule 12.B.1 consent would be required under 12.B.3.1 as a restricted discretionary activity. Council’s discretion is restricted to the*

matters specified in the rule and includes consideration of the relevant values listed in Schedule 1 of the Water Plan¹.

- *If a resource consent is required under Rule 12.B.3.1, assessment of the matters of discretion within 12.B.3.1 would be required as part of the application. This would include and assessment of the following matters:*
 - a. *A description of the nature of the stormwater discharge, including its source, the contaminants that may become entrained in the discharge, such as sediment, nutrients, hydrocarbons, metals or other chemicals.*
 - b. *A description of the volume, rate and method of the discharge and treatment options for the discharge (e.g: interceptor sumps, treatment basins, soakage pits, proprietary treatment devices, swales).*
 - c. *Identification of the discharge point or area (to land or to surface water), and any alternative receiving environments.*
 - d. *An assessment of:*
 - i. *The likelihood of erosion, land instability, sedimentation or property damage as a result of the discharge and the potential for soil contamination.*
 - ii. *Any adverse effects on the relevant values listed in Schedule 1, amenity and heritage values for the Silver Stream and natural character of the Silver Stream. Any existing lawful activity associated with the Silver Stream.*
 - iii. *The duration of the stormwater discharge and any monitoring or maintenance requirements.*
 - e. *Assessment against the relevant objectives and policies of the Regional Plan (e.g. Water Plan), including those relating to water quality, discharge management, and the protection of ecological and cultural values.*
 - f. *Consideration of tangata whenua values, and whether any consultation has been undertaken regarding potential effects on mahinga kai, wāhi tapu, or the mauri of water.*

Discharge of water (other than stormwater)

- *If there is a discharge of water (other than stormwater) or a contaminant, consent would be required under 12.B.4.1 as a discretionary activity (as the site would be an industrial or trades premises).*
- *If a resource consent is required under Rule 12.B.4.1, the following assessment would be required:*

¹ Specific values are listed in the Otago Regional Council's pre-application consultation feedback

- a. *A description of the type of water or contaminant being discharged, including its source (e.g., washwater, dewatering water), volume, rate, frequency, and duration of discharge.*
- b. *An assessment of any contaminants present in the discharge, including sediment, nutrients, hydrocarbons, metals, or other chemicals, with reference to relevant water quality standards or guidelines.*
- c. *Description of the receiving environment, including its sensitivity, current use, and existing water quality or ecological values (eg: values listed in Schedule 1 of the Water Plan).*
- d. *Evaluation of the actual and potential effects of the discharge on the receiving environment, including cumulative effects, and whether it could result in adverse effects such as contamination, degradation of water quality, or impacts on aquatic life.*
- e. *Details of proposed mitigation measures to avoid, remedy, or mitigate adverse effects, such as treatment systems (e.g., sediment traps, filtration, oil and grit interceptors or proprietary treatment devices), discharge controls, or containment measures. This should include the design specifications and sizing of the treatment system and any ongoing maintenance requirements.*
- f. *Identification of the best practicable option to prevent or minimise adverse effects.*
- g. *Assessment against the relevant objectives and policies of the Regional Plan (e.g. Water Plan), including those relating to water quality, discharge management, and the protection of ecological and cultural values.*
- h. *Consideration of tangata whenua values, and whether any consultation has been undertaken regarding potential effects on mahinga kai, wāhi tapu, or the mauri of water.*

Drilling of land

The site is located over the Lower Taieri Aquifer identified in the C-series maps. If the drilling of land over an aquifer is required, other than for the purpose of creating a bore or within the bed of any river, resource consent would be required as a controlled activity under Rule 14.2.2.1.

If resource consent is required under Rule 14.2.2.1 an assessment of the matters of control within Rule 14.2.2.1 would be required as part of the application.

Defence against water

“Defence against water” is defined in the Water Plan as:

Any dam, weir, bank, carriageway, groyne, or reservoir, and any structure or appliance of any kind which has or may have the effect of stopping, diverting, controlling, restricting, or otherwise regulating the flow or spread or subsidence, in or out of a water body, of water including flood waters, which is specifically established for the purpose of flood hazard mitigation.

If a defence against water is required, due to floodwater being directed into channels by bunds, resource consent would be required under Rule 14.3.2.1 as a discretionary activity.

If a resource consent is required under Rule 14.3.2.1, the following assessment would be required:

- a. An explanation of the structure's role as a defence against water, including how it contributes to flood hazard mitigation.*
- b. Evaluation of the effects on water quality, aquatic ecosystems, and natural character of the waterbody. This includes sedimentation, vegetation clearance, or disturbance to aquatic habitat during construction or operation.*
- c. An assessment of consistency with the relevant objectives and policies of the Water Plan, particularly those related to flood hazard management, natural character, and integrated management of land and water resources.*
- d. Confirmation that the structure is designed and will be maintained to perform its intended function, including evidence of engineering input where relevant.*

Damming or diversion of water

“Divert” is defined in the Water Plan as:

In relation to the diversion of water, is the process of redirecting the flow of water from its existing course to another.

If the damming or diversion of flood water is required, the application will need to meet the permitted activity rules within Rule 12.3.2. If the permitted activity rules cannot be complied with, resource consent would be required under Rule 12.3.4.1 as a discretionary activity.

If a resource consent is required under Rule 12.3.4.1, an assessment similar to that required for defence against water processes would be required.

Bore construction

The referral application does not specify whether the site will be connected to a reticulated water supply. As the site is located within a water supply zone boundary within the Water Services map, it is assumed that connection to the reticulated network will occur.

The Water Plan defines a “bore” as:

Every device or means, including any well or pit, which is drilled or constructed for the purpose of taking groundwater, or which results in groundwater being taken, other than piezometers or other monitoring devices used for water sampling purposes only.

If temporary dewatering of groundwater during construction is required or a bore is required to obtain groundwater for other uses, consent would be required under Rule 14.1.1.1 for the construction of a bore as a controlled activity.

If a resource consent is required under Rule 14.1.1.1 assessment of the matters of control within Rule 14.1.1.1 would be required as part of the application.

Take and use of surface water and/or groundwater (including groundwater hydraulically connected to Silver Stream)

The site is located within the Lower Taieri – East Aquifer and groundwater allocation is currently available. Silver Stream is located within the Taieri Catchment and is currently fully allocated.

Policy 6.4.1A sets out a method to determine how to allocate groundwater when it is hydraulically connected to surface water. It requires a groundwater take be allocated as:

- a. A surface water take and subject to a minimum flow, if the take is within 100 metres of any connected perennial surface water body; or
- b. Groundwater and part surface water if the take is 100 metres or more from any connected perennial surface water body, and depletes that water body most affected by at least 5 litres per second determined in accordance with Schedule 5A; or
- c. Groundwater if the above scenarios do not occur.

If construction phase dewatering is required or groundwater is required to be obtained for other uses (such as to provide supply to the site or for dust suppression purposes), and the taking and use of groundwater is within 100 metres of Silver Stream (if it is not considered connected) or is greater than 100 metres or more from Silver Stream and depletes the water body by less than 5 litres per second as determined in accordance with Schedule 5A, it is able to be allocated as groundwater.

Rule 12.2.2.2. provides a permitted activity pathway for the take and use of groundwater. If the permitted standards are able to be achieved, the activity may be permitted. Where the standards of Rule 12.2.2.2 are unable to be met, the take and use of groundwater may require resource consent as a discretionary activity in accordance with Rule 12.2.4.1. The following matters will require assessment:

- a. The rate frequency, timing and frequency of groundwater to be used and the method of abstraction, delivery and use of groundwater taken.
- b. The location where the groundwater take will occur.
- c. The volume of groundwater sought and the impact of that volume on the aquifer, including the hydrodynamic properties of the aquifer and vulnerability of the aquifer to compaction.
- d. An assessment of whether any part of the take would constitute allocation from the Silver Stream and the availability of that allocation (noting that the Taieri Catchment is overallocated).
- e. An assessment of the actual and potential effects of the abstraction and use, including any bore interference effects.
- f. An assessment of consistency with the relevant objectives and policies of the Water Plan, particularly those related to groundwater abstraction and use.
- g. Consideration of tangata whenua values, and whether any consultation has been undertaken regarding potential effects on mahinga kai, wāhi tapu, or the mauri of water.

If the groundwater abstraction is within 100 metres of a connected surface water body (Silver Stream) the take will be fully allocated to surface water. If the groundwater abstraction is greater than 100 metres from a connected surface water body and contributes to depletion greater than 5 litres per second, it can be partially allocated to surface water and groundwater.

The Taieri Catchment is fully allocated. Rule 12.0.1.2 provides a direct prohibited activity status for a resource consent application that seeks to take water as primary allocation whether that take would cause the primary allocation of a catchment to exceed the relevant limit in Policy 6.4.2.

The Water Plan includes provisions for the taking of supplementary allocation. Policies 6.4.9 and 6.4.10 sets out a methodology for determining supplementary allocation, where appropriate. Rule 12.1.4.7 applies to the taking and use of surface water as supplementary allocation within the Taieri Catchment as a restricted discretionary activity. An application for resource consent under this rule would require an assessment against the matters of Rule 12.1.4.8.

7.2 Waste Plan

The site is not listed on the Otago Regional Council - Listed Land Use Register. However, if the site (or a portion of the site) is contaminated and earthworks are required, which will disturb the site, consent would be required for disturbance of a contaminated site under Rule 5.6.1.

If a resource consent is required under Rule 5.6.1, the following assessment would be required:

- a. A description of the proposed earthworks, including location, depth, area, and duration of the disturbance.*
- b. Identification and characterisation of the nature and extent of contamination present on the site, supported by a Preliminary Site Investigation or Detailed Site Investigation.*
- c. An assessment of the risks posed by the disturbance to, groundwater, surface water, and ecological receptors, including potential migration of contaminants.*
- d. Details of proposed management or mitigation measures, including a Contaminated Site Management Plan or Remediation Action Plan if required, addressing containment, removal, treatment, or off-site disposal of contaminated material.*
- e. Identification of any off-site disposal facilities proposed to receive contaminated soil, and confirmation that they are appropriately consented.*
- f. Evaluation of consistency with the relevant objectives and policies of the Otago Regional Plan: Waste, particularly those seeking to minimise the risk of contaminant discharges and protect environmental and human health.*
- g. Consideration of cultural effects and consultation undertaken with tangata whenua, particularly where contaminated land may affect culturally sensitive sites or values.*

7.3 Air Plan

The details of the activity are largely unknown, and as such, a full assessment of the activity against the Air Plan will be required within the substantive application. Based on the information provided within the referral application, the following rules might be applicable.

Industrial or trade process

The Air Plan defines “Industrial or trade process” as:

Includes every part of a process from the receipt of raw material to the dispatch or use in another process or disposal of any product or waste material, and any intervening storage of the raw material, partly processed matter, or product.

If the activity includes industrial or trade processes, consent may be required under Rule 16.3.5.9 as a discretionary activity. This would include discharges of dust, particulate (PM₁₀), odour and any other air borne contaminants.

Rule 16.3.5.2 permits the discharge from the sorting, crushing, screening, conveying and storage of powdered or bulk products where the outdoor storage of bulk products is less than 1,000 m³ if located on a site in Air Zone 2, and the crushing and screening of bulk materials is at a rate less than 100 tonnes an hour.

If a resource consent is required under Rule 16.3.5.9, the following assessment would be required:

- a. A detailed description of the industrial or trade process, including all activities on site that may result in the discharge of dust, particulates, odour or other contaminants to air.*
- b. Identification of the type, source, and characteristics of the discharge, including the nature and volume of contaminants (e.g. dust, odour, fumes) and how frequently discharges are expected to occur (via a FIDOL assessment or similar methodology).*
- c. Assessment of the potential effects of the discharge on ambient air quality, including the proximity of sensitive receptors such as residential dwellings, schools, or community facilities.*
- d. Evaluation of the site’s location, including prevailing wind conditions, topography, and any existing air quality monitoring data.*
- e. Proposed mitigation measures to manage and minimise discharges to air, such as dust suppression systems, water sprays, enclosures, covers, or vegetation buffers.*
- f. Consideration of cumulative effects in combination with other existing discharges to air in the surrounding area.*
- g. Assessment of consistency with the objectives and policies of the Regional Plan: Air, particularly those seeking to maintain ambient air quality and avoid, remedy or mitigate adverse effects on health and amenity.*
- h. Consideration of any cultural effects where discharges may affect areas of cultural or spiritual significance, and a summary of any consultation with tangata whenua.*

Petroleum and hydrocarbons

Rule 16.3.5.7(2) of the Air Plan permits the discharge of contaminants into air from the handling and storage of hydrocarbons at bulk terminals provided any discharge of odour or gases is not noxious, dangerous, offensive or objectionable at or beyond the boundary of the property.

Ventilation or vapour displacement

Rule 16.3.11.1 of the Air Plan permits discharge of contaminants into air from:

- a. tanks used for the storage of liquids, excluding the storage of hydrocarbons as permitted by Rule 16.3.5.7 on any industrial or trade premises; or
- b. the venting of gas pipelines, pumps, compressors, tanks or associated equipment when released for the purposes of refilling, servicing or repair, on any industrial or trade premises,
- c. provided any discharge of odour or particulate matter is not noxious, dangerous, offensive or objectionable beyond the boundary of the property.

If the permitted activity standards are unable to be met, the discharge will require resource consent as a discretionary activity under Rule 16.3.11.2. If resource consent is required, an assessment similar to that required for discharges to air from industrial or trade processes would be required.

General permitted activities

Rule 16.3.13.1 of the Air Plan permits discharges from miscellaneous activities, including vehicle engine maintenance and servicing, or building and construction activities, provided any discharge of smoke, odour, particulate matter or gas is not noxious, dangerous, offensive or objectionable at or beyond the boundary of the property.

If the permitted activity standard is unable to be met, the discharge will require resource consent as a discretionary activity under Rule 16.3.14.1. If resource consent is required, an assessment similar to that required for discharges to air from industrial or trade processes would be required.

Discharges of PM₁₀

Rule 16.3.15.5 of the Air Plan requires resource consent as a discretionary activity for the discharge of PM₁₀ to air in an airshed providing:

- a. The concentration of PM₁₀ in the airshed does not breach its ambient air quality standard; or
- b. The granting of the resource consent is not likely, at any time, to cause the concentration of PM₁₀ in an airshed to breach its ambient air quality standard.

If resource consent is required under this rule an assessment similar to that required for discharges to air from industrial or trade processes would be required. In addition, an assessment would also need to assess the extent to which the discharge to air may contribute to a breach of the ambient air quality standard in the polluted airshed.

7.4 Kāi Tahu Ki Otago Natural Resource Management Plan 2005

The application will require assessment against the relevant objectives and policies in the Kāi Tahu ki Otago Natural Resource Management. This assessment should include consideration of the following:

- a. Region-wide objectives and policies in Section 5.2; and
- b. Taieri specific objectives and policies in Section 9.

7.5 Assessment against relevant national planning documents

Based on the information provided, the following national planning documents may be relevant:

7.5.1 National Policy Statement for Freshwater Management 2020 (NPS-FM)

The referral application does not contain a detailed assessment of the project against the relevant provisions of NPS-FM. This assessment is required within the substantive application.

7.5.2 National Environmental Standards for Air Quality (NES-AQ)

The site is located within a gazetted polluted airshed boundary, as defined under the (NES-AQ). As such, any new discharge to air from within this airshed must be assessed against Regulation 17, which restricts the granting of resource consent for activities that would increase PM10 emissions unless certain criteria are met.

7.5.3 National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023 (NES-GGEIPH)

If the application contains fossil fuel-fired heat devices, an assessment of the NES-GGEIPH will be required.

7.5.4 Resource Management (National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat) Regulations 2023 (NES-GGEIPH)

If industrial process heat devices are proposed for the site, the relevant regulations of the NES-GGEIPH will require consideration. If resource consent is required, the following information is required:

- a. Consideration of whether a site wide approach is required; and*
- b. The content and adequacy of an emissions plan (including a review of the emissions plan by a suitably qualified person) to ensure the matters in Regulation 15 are addressed.*

If resource consent is required as a restricted discretionary activity, the following matters require assessment:

- a. The best practical option to minimise or prevent any actual or likely adverse climate change effects and any energy efficiency improvements;*
- b. Any emissions reduction target and the content of an emissions plan; and*
- c. Requirements for monitoring and reporting of the activity to the Council.*

7.5.5 Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F)

If works near or within natural inland wetlands are required as part of the proposal, Regulations of the NES-F may be relevant for assessment.

Construction, operation and maintenance of specified infrastructure or other infrastructure

Based on the information provided, if there are any natural inland wetlands within or near the site and works are for the purpose of constructing 'specified infrastructure' is proposed, Regulation 45 may be relevant and resource consent would be required as a discretionary activity. The Regulation applies to

any vegetation clearance, earthworks or land disturbance within or within 10 metres of a natural inland wetland, any earthworks or land disturbance outside of 10 metres but within 100 metres of a natural inland wetland and any take, use, dam, discharge or diversion within or within 100 metres of a natural inland wetland.

If resource consent is required, an assessment will be required as follows:

- a. Whether the infrastructure is 'specified infrastructure' as defined by the NES-F.*
- b. The extent and values of the wetland and the nature, scale, location, intensity and timing of the activity.*
- c. The actual and potential effects the activity may have on the natural inland wetland including any impact of the hydrological function or change in water level.*
- d. Any measures to avoid, remedy or minimise adverse effects on the wetland and an assessment of the how the activity will be managed through applying each step of the effects management hierarchy. If aquatic offsetting or aquatic compensation is required, an assessment of principles 1 to 6 in Appendix 6 and 7 of the NPSFM.*

If any vegetation clearance or earthworks within or within 10 metres of a natural inland wetland is required, or any take, use, damming or discharge of water within or within 100 metres of a natural inland wetland is required for the maintenance or operation of specified infrastructure or other infrastructure, resource consent may be required. Regulation 46 provides the permitted standards for this activity, where these are unable to be met, resource consent will be required as a restricted discretionary activity. An application for resource consent will require assessment of the same matters as set out in relation to Regulation 45 above.

Drainage of natural inland wetlands

If the proposal includes earthworks or the taking, use, damming or diversion of water outside, but within a 100 metre setback from a natural inland wetland that results, or is likely to result, in the complete or partial drainage of all or part of a natural inland wetland, and the drainage does not have another status under the other regulations of the NES-F, it requires resource consent as a non-complying activity under Regulation 52.

If resource consent is required, the following matters will require assessment:

- a. The extent and values of the wetland and the nature, scale, location, intensity and timing of the activity.*
- b. The actual and potential effects the activity may have on the natural inland wetland, including any impact on the hydrological function or change in water level.*
- c. Any measures to avoid, remedy, or minimise adverse effects on the wetland and an assessment of how the activity will be managed by applying each step of the effects management hierarchy. If aquatic offsetting or aquatic compensation is required, an assessment of principles 1 to 6 in Appendix 6 and 7 of the NPSFM.*

8. Compliance comments

The Compliance Team requests that the applicant supply confirmation of any odour effects of proposed development during the construction of the 2 stages and future stages, along with the routine daily operation of the site after its construction.

9. Biosecurity comments

The applicant will need to ensure there are appropriate biosecurity plans in place to manage any biosecurity risk for the region with an inland port in place, so these threats are not able to spread.

10. Transport comments

The project aligns with the South Island Regional Transport Committee Chairs Group's goal of investing in strategic freight hubs to increase road and rail freight across the South Island.

According to Section C.7 of the South Island Freight Study (2019) released by the South Island Regional Transport Committee Chairs Group, the project is expected to remove 9500 truck movements per year each way on SH88 and through Central Dunedin. Removing these truck movements could bolster the case for traffic calming measures to be implemented in Central Dunedin, which would improve public and active transport.

Appendix 1: BECA Ecology Review Letter - Southern Link Inland Port Referral Application - 30 June 2025

Appendix 2: BECA Hydrogeological Review Letter - Southern Link Inland Port - 27 June 2025

Appendix 3: MORPHUM Engineering Natural Hazards Review Letter - Southern Link Inland Port - 27 June 2025

Appendix 4: INCITE Policy Review Letter - Southern Link Inland Port 30 June 2025

Appendix 5: INCITE Consent Assessment - Southern Link Inland Port - 30 June 2025



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Otago Regional Council
70 Stafford Street
Dunedin, 9016
New Zealand

30 June 2025

Attention: Mat Bell

Dear Mat

Southern Link Inland Port – Fast Track Referral Application Ecological Review

A review of the high-level Fast Track Referral Application for the Southern Link Inland Port, Mosgiel, Otago was undertaken for the purposes of providing comments regarding ecological matters to be addressed within the substantive application. The application is for a 50-ha logistics and freight hub development proposed within the rural zone.

The following documents have been reviewed:

- Pre-Application Meeting Follow up – RM25.034 Letter. Prepared by Otago Regional Council, April 2025.
- Southern Link Inland Port - Fast-track Approvals Act 2024 Referral Application. Prepared by Southern Link Property Limited, May 2025.

Ecological Matters

It is recommended that a comprehensive Ecological Impact Assessment is prepared in accordance with the EIANZ guidelines for the substantive application. This should be prepared by a suitably qualified ecologist and include an assessment of the potential and actual effects of the proposal on freshwater and terrestrial features within the site and receiving environment. Site investigations to ground-truth ecological features will be required to accurately describe ecological value and appropriately assess potential impacts of the proposal.

The application may include the discharge of stormwater to the Silver Stream, which is considered to provide significant habitat for Threatened and At Risk native freshwater fish upstream of Wingatui Road and holds a high degree of naturalness and cultural value. Therefore, the EclA should also include an assessment of the ecological effects of the proposal on the receiving environment, such as stormwater discharge on the Silver Stream, along with appropriate mitigation measures to manage adverse effects (if required).

It is assumed that removal of terrestrial vegetation within the site will also be required. Therefore, the impact assessment should consider the value of the vegetation proposed for removal and any potential adverse effects associated with this activity on native fauna that may be present (i.e. bats, birds, lizards).

Yours sincerely,



Emily Fensham

Ecologist
on behalf of

Beca Limited

Email: s.9(2)(a)



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Otago Regional Council (ORC)
Level 2
144 Rattray Street
Dunedin 9016
New Zealand

27 June 2025

Attention: Mat Bell

Dear Mat

Southern Link Inland Port Fast Track Consent Application – Hydrogeological Audit

1 Introduction

Otago Regional Council (ORC) has received a Fast Track Consent Application for the Southern Link Inland Port Development from Southern Link Property Limited. ORC has commissioned Beca Limited (Beca) to provide high-level commentary on the application from a hydrogeological perspective, thereby guiding any future groundwater-related assessment(s) which will need to be provided by the Applicant.

1.1 Project Context

The proposed Southern Link Inland Port is a “comprehensive Inland Port/ Logistics Hub to service Port Otago” and includes major infrastructure including a rail siding, warehousing, container depot, container terminal, bulk storage facilities, road widening and ancillary activities to support the above. The primary purpose of the inland port is to reduce pressure on Port Chalmers site which carries significant space constraints, as well as improving capacity, efficiency and long-term resilience of the network.

Establishment of the proposed inland port will involve earthworks and construction activities over a period of time.

The proposed site is located on a flat block of land at 270 – 292 Dukes Road North, North Taieri which is within the Dunedin City Council (DCC) Territorial Authority.

2 High-level Commentary on Groundwater Assessments

In order for a suitably informed assessment of groundwater-related risk to be made in the future by ORC, the Applicant may need to provide the following assessments related to groundwater:

2.1 Dewatering Assessment

The groundwater table underneath the proposed site may be less than 2 m below ground level (m BGL) based on available information in the area. As a result, temporary dewatering is likely to be required to lower the groundwater table within excavation(s) to a suitable level for construction to take place. It should be noted that the site lies within a Groundwater Protection Zone.

At a minimum, the dewatering assessment should consider:



- Depth of dewatering required.
- Duration of dewatering required.
- Flow rates required, both peak flows and stabilised flows.
- Total groundwater abstraction volumes.
- Dewatering methodology.
- Number of bores required and associated land use effects
- Management for discharge of abstracted groundwater, including discharge water quality.
- Potential effects on neighbouring groundwater users.
- Potential effects on neighbouring structures.
- Potential effects on the environment, particularly if the site contains contaminated land.

2.2 Settlement Assessment

Dewatering can lead to ground settlement; hence an assessment of settlement risk should be undertaken in conjunction with the above dewatering assessment and should include a suitable methodology to mitigate settlement risk.

2.3 Flood Protection Bund Design Assessment

The proposed site sits on the Taieri Plain, which is a large, low-lying, near-flat floodplain containing the Taieri and Waipori Rivers. The site is therefore likely going to require a flood-protection bund to protect it against future flood events. A hydrogeological assessment of the bund design and toe drain is recommended to assess the suitability of the design and materials. The drainage system may intercept groundwater and requires the volume of abstraction, frequency and hydraulic connection to the stream/river to be further assessed. Any associated water quality effects should also be considered, particularly if there is potential for migration of contaminants in the drainage system.

2.4 Consumptive Groundwater Takes for the Facility

The site lies over the East Lower Taieri Aquifer which currently has allocation available. If any groundwater takes are planned for water supply use at the facility, this will require a consent to construct a groundwater bore and take and use the water which will likely require an Assessment of Environmental Effects (AEE).

Yours sincerely



Nick Jowsey

Hydrogeologist

on behalf of

Beca Limited

Phone Number: s 9(2)(a)
Email: s 9(2)(a)

Copy

Mike Thorley, Beca
James Taylor, Beca
Nicola Brown, Beca

Memorandum

Date:	27/06/2025
To:	Otago Regional Council – Mat Bell
From:	Amanda Ling
Project Number:	P05379
Reviewed by:	Ezequiel Silva
Released by:	Jason Smith

Subject: Port Otago Fast Track

Otago Regional Council (ORC) require an assessment of the technical reports and assessments expected to be submitted by the applicant in the substantive fast track application.

The fast track application is for a proposed inland port / logistics hub to service Port Otago. The site location is at 270 – 292 Dukes Road North, North Taieri.

The application documents reviewed include:

- Fast-track Approvals Act 2024 Referral Application for Southern Link Inland Port, prepared by Southern Link Property Ltd, dated 14 May 2025
- Southern Link Inland Port – Indicative Site Layout, prepared by Southern Link Property Ltd, dated May 2025
- Southern Link Inland Port –Site Location Map, prepared by Southern Link Property Ltd, dated May 2025

Otago Natural Hazards GIS indicates the development site is subject to flood hazard. Silver Stream is located adjacent to the southern boundary of the site and is part of the East Taieri Drainage Scheme. Towards the downstream of Silver Stream, there is a pump station and detention gate which are activated when flows in the Taieri River are high.

The following technical reports and assessments are anticipated to be provided:

- A 100-year ARI flood assessment report, including a demonstration that there is no increase in adverse effects on upstream or downstream properties, assessment of any flood volume displacement, effects on the operation of the existing Taieri Drainage Scheme, hazard risk assessment and any mitigation measures proposed.
- The site is located adjacent to a Scheduled Drain S3 asset owned and managed by ORC. The Flood Protection Management Bylaw requires approval from ORC for works near a scheduled asset. An assessment should be provided demonstrating that the proposed works will not adversely affect the scheduled flood protection drainage.
- A comprehensive Stormwater Management Plan and details for proposed onsite stormwater management device(s), including measures to manage stormwater quantity and attenuate peak discharges where appropriate, in line with regional plan requirements.

Disclaimer Statement

This memo has been prepared for Otago Regional Council, according to their instructions, for the particular purpose and objectives described in the memo. Morphem Environmental Ltd accepts no responsibility for the content of this memo if it is used by any other party or for any other purpose or objective. Any use of or reliance on the information contained in this memo for decisions made by third parties are the responsibility of these third parties. Morphem Environmental Ltd accepts no responsibility for damage incurred by third parties resulting from the use of or reliance on this memo, or if the memo is used by any party for other than the purpose and objectives described herein.



Amanda Ling
Civil & Environmental Engineer
Morphum Environmental Ltd
Phone: S 9(2)(a)
Email: S 9(2)(a)

MEMORANDUM

Date: 30 June 2025

To: Warren Hanley (Otago Regional Council)

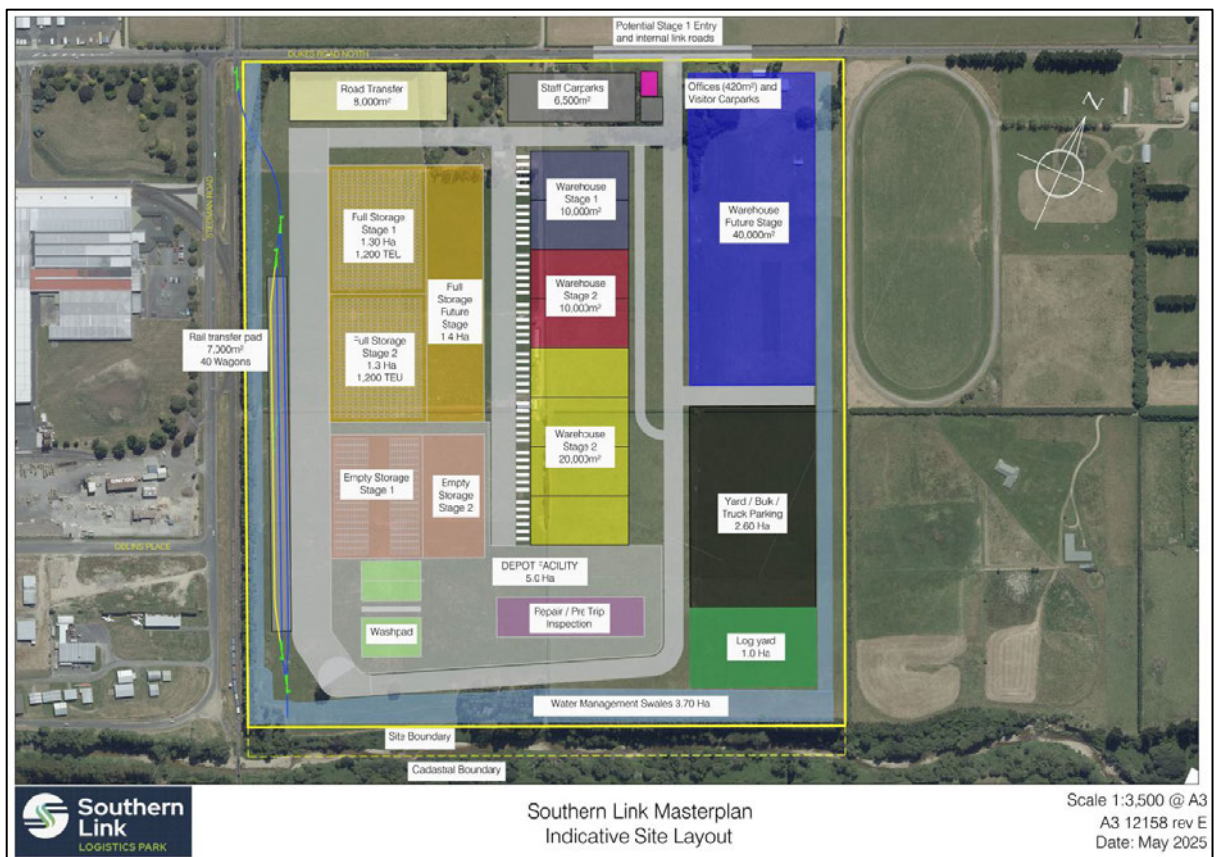
From: Andrew Maclellan (Incite)

Subject: Review of technical reporting on Southern Link Property Limited



1.1 Introduction

1. The proposed Southern Link Inland Port is a comprehensive Inland Port / Logistics Hub to service Port Otago.
2. The referral application has been made to the Minister (this is the first stage - seeking the Minister's approval for the project to be assessed through the Fast Track process, it is not the substantive application stage). As part of the referral process, the Minister is seeking feedback from ORC.
3. The referral application includes the following indicative site layout plan:



4. The referral application has been assessed against the following documents:
 - a. Decisions Version of the proposed Otago Regional Policy Statement 2021 (pORPS);

1.2 Fast Track Approvals Act 2024 (FT Act)

5. The following sections of the FT Act are relevant:

10 Procedural principles

- (1) *Every person performing functions and duties and exercising powers under this Act must take all practicable steps to use timely, efficient, consistent, and cost-effective processes that are proportionate to the functions, duties, or powers being performed or exercised.*
- (2) *Without limiting subsection (1), that subsection—*
 - (a) *includes a duty to act promptly in circumstances where no time limit has been set for the performance or exercise of a function, power, duty, or requirement under this Act;*
 - (b) *applies to any chief executive of a department when they are providing any advice, report, or comment under this Act or supporting a Minister to do so.*
- (3) *A failure to comply with this section does not of itself invalidate the performance of a function or duty or the exercise of a power under this Act.*

17 Minister invites comments

- (1) *The Minister must copy the application to, and invite written comments from,—*
 - (a) *the relevant local authorities; and*

...
- (3) *Without limiting subsection (1), a local authority must provide comments advising of—*
 - (a) *any applications that have been lodged with the local authority that would be competing applications if a substantive application for the project were lodged; and*

...
- (6) *Anyone who is invited to provide written comments under this section has 20 working days from the receipt of the copy of the application to do so.*

1.3 Assessment

Otago Regional Policy Statements

- 6. The referral application does not contain a detailed assessment of the project against the relevant provisions of either the Otago Regional Policy Statement 2019 (ORPS) or the Proposed Otago Regional Policy Statement 2021 (pORPS). This assessment is required within the substantive application.
- 7. ORC notes that the proposed activity does not appear to meet the description or definition of “nationally significant infrastructure” or “regionally significant

infrastructure within the ORPS¹ or pORPS². However, it appears the activity will meet the definition of “Infrastructure” within the pORPS, which includes:

(h) *facilities for the loading or unloading of cargo or passengers transported on land by any means.*

8. Where an activity meets the definition of “nationally significant infrastructure” or “regionally significant infrastructure”, both the ORPS and pORPS apply a separate effects management hierarchy³ when such activities are located within sensitive environments⁴. Given that the proposed activity does not appear to be located within a sensitive environment, meeting one of these definitions is not expected to materially affect the assessment of the application under the ORPS or pORPS.
9. Based on the information provided within the referral application, ORC consider that the assessment of the ORPS and pORPS should have a particular focus on the provisions of these documents that relate to:
 - a. Freshwater⁵, including provisions related to preserving and restoring natural character and instream values⁶, stormwater⁷ and industrial and trade waste discharges⁸,
 - b. Discharges to air⁹.
 - c. Soil values¹⁰, including provisions related to soil quality¹¹, soil erosion¹², and highly productive land¹³.
 - d. Development in rural areas¹⁴.
 - e. Ecosystems and indigenous biological diversity¹⁵, including provisions related to restoration and enhancement¹⁶.
 - f. Natural hazards¹⁷, including provisions related to natural hazard mitigation and hard protection structures.
 - g. Provision of infrastructure¹⁸, including provisions related to the transport system¹⁹.

¹ As described within Policy 4.3.2

² “Nationally significant infrastructure” and “Regionally significant infrastructure”, are defined terms within the pORPS

³ Policy 4.3.4 and EIT-INF-P13

⁴ Including: significant natural areas, outstanding natural features and landscapes, wetlands, outstanding water bodies, etc.

⁵ Policies 3.1.1, 3.1.2, and LF-FW-P7,

⁶ Policies LF-LW-P13 and LF-FW-P14

⁷ Policies LF-FW-P15

⁸ Policies LF-FW-P16

⁹ Policies 3.1.6, 5.4.1, 5.4.4, AIR-P1, AIR-P3, AIR-P4

¹⁰ Policies 3.1.7, 3.1.8, 3.2.18, LF-LS-P17

¹¹ Policy LF-LS-P16

¹² Policy LF-LS-P18

¹³ Policy LF-LS-P19

¹⁴ Policies 5.3.1 and UFD-P7

¹⁵ Policies 3.1.9 and ECO-P6

¹⁶ Policies 3.1.13 and ECO-P8

¹⁷ Objective 4.1 and associated policies, HAZ-NH chapter

- h. Contaminated land (if applicable)²⁰.
10. ORC notes that the application site is located within a flood hazard area. The referral application states that the activity has been designed to ensure floodwaters can be effectively managed, without increasing flood risk on surrounding land or affecting the operation of ORC's flood management infrastructure. As part of the substantive application, details of the proposed flood management approach will need to be provided, along with an assessment of the relevant natural hazard provisions in the ORPS and pORPS.
11. In addition, ORC note that the application site is located within an area that meets the definition of "highly productive land". The referral application includes a high-level assessment of the NPS-HPL. As part of the substantive application, a detailed assessment of the NPS-HPL and the provisions of pORPS and OPRS related to highly productive land, significant soils, and also development within the rural area will need to be provided.

Otago Southland Regional Land Transport Plan 2021–2031 (Mid-term Review 2024) (RLTP)

12. Based on the information provided in the referral application, ORC considers that the direction set out in the RLTP supports the outcomes that the Southern Link Inland Port application is intended to deliver, particularly in relation to freight efficiency, network resilience, and emissions reduction. The RLTP places strong emphasis on moving freight by rail rather than on trucks, reducing freight-related emissions, and improving the resilience and efficiency of regional supply chains. In particular, the RLTP states:

"To further increase opportunities for freight on rail, the combined RTCs favour an inland port located between Dunedin and Balclutha. A primary user of this inland port is likely to be the forestry sector, which has estimated that 50,000 tonnes of logs could be transferred to rail.

The successful development of an inland port requires comprehensive planning, robust infrastructure and transport connections. Careful consideration of the potential impacts on surrounding communities and the environment from freight movements to and from the port are also critical.

*To be most effective, this type of investment would also need to address resilience issues on the Taieri Plains that arise from flooding. The current Gore main line rail bridge restricts the flow of the Mataura River during flood events and is at risk of significant damage. The RTC currently advocates for upgrades to this bridge as a matter of urgency."*²¹

13. Given this, the proposed development of an inland port in this location that consolidates freight movements, reduces heavy vehicle traffic, and increases utilisation of existing rail

¹⁸ Policies 4.3.1 and EIT-INF-P14

¹⁹ Policies EIT-TRAN-P18 and EIT-TRAN-P22

²⁰ Policies 4.6.5, HAZ-CL-P14, and HAZ-CL-P15

²¹ Page 29 of RLTP

infrastructure is considered to be consistent with the direction within the RLTP's provided the potential impacts listed within the RLTP can be resolved.

Conclusion

14. Based on the information provided in the referral application, the ORC notes that a detailed assessment of the proposal against the ORPS and pRPS has not been provided. This assessment will be required at the substantive application stage. ORC considers that particular attention should be given to provisions relating to freshwater, air discharges, soil values, rural development, ecosystems and indigenous biodiversity, natural hazards, contaminated land (if applicable), and infrastructure provisions.
15. ORC considers that the application aligns well with the direction of the RLTP, which specifically highlights the Regional Transport Committee's preference for an inland port located between Dunedin and Balclutha provided the potential impacts of the activity can be managed.

MEMORANDUM

Date: 30 June 2025

To: Mat Bell (Otago Regional Council)

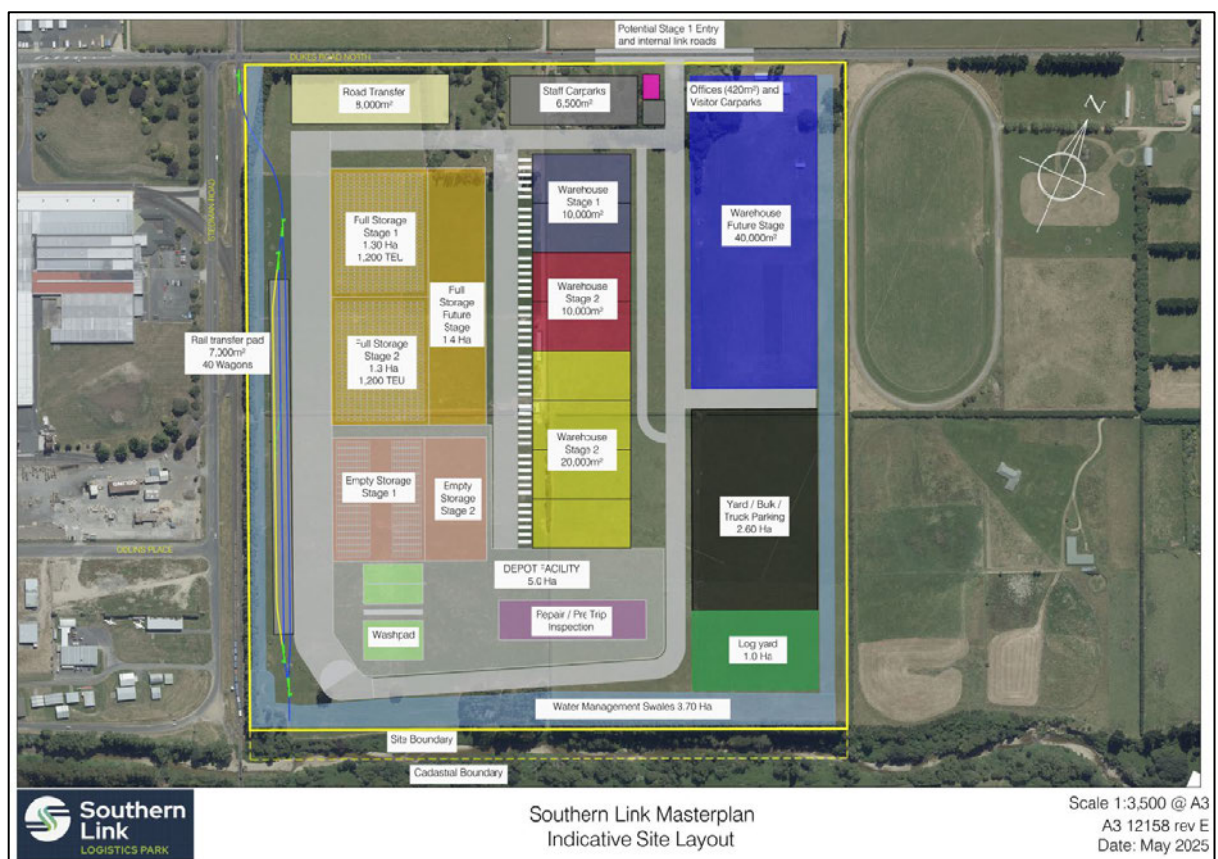
From: Andrew Maclellan and Hannah Goslin (Incite)

Subject: Review of referral application from Southern Link Property Limited



1.1 Introduction

1. The proposed Southern Link Inland Port is a comprehensive Inland Port / Logistics Hub to service Port Otago.
2. The referral application has been made to the Minister. As part of the referral process, the Minister is seeking feedback from ORC.
3. The referral application includes the following indicative site layout plan:



4. The referral application has been assessed against the following documents:
 - a. Decisions Version of the proposed Otago Regional Policy Statement 2021 (pORPS);
 - b. Operative Otago Regional Policy Statement 2019 (ORPS);

- c. Regional Plan: Water for Otago (Water Plan);
- d. Regional Plan: Waste for Otago (Waste Plan);
- e. Regional Plan: Air for Otago (Air Plan);
- f. Kāi Tahu Ki Otago Natural Resource Management Plan 2005;
- g. Flood Protection Management Bylaw 2022.
- h. National Policy Statement for Freshwater Management 2020; and
- i. Resource Management (National Environmental Standards for Air Quality) Regulations 2004;
- j. Resource Management (National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat) Regulations 2023; and
- k. Resource Management (National Environmental Standards for Freshwater) Regulations 2020.

1.2 Fast Track Approvals Act 2024 (FT Act)

5. The following sections of the FT Act are relevant:

10 Procedural principles

- (1) *Every person performing functions and duties and exercising powers under this Act must take all practicable steps to use timely, efficient, consistent, and cost-effective processes that are proportionate to the functions, duties, or powers being performed or exercised.*
- (2) *Without limiting subsection (1), that subsection—*
 - (a) *includes a duty to act promptly in circumstances where no time limit has been set for the performance or exercise of a function, power, duty, or requirement under this Act:*
 - (b) *applies to any chief executive of a department when they are providing any advice, report, or comment under this Act or supporting a Minister to do so.*
- (3) *A failure to comply with this section does not of itself invalidate the performance of a function or duty or the exercise of a power under this Act.*

17 Minister invites comments

- (1) *The Minister must copy the application to, and invite written comments from,—*
 - (a) *the relevant local authorities; and*
- ...
- (3) *Without limiting subsection (1), a local authority must provide comments advising of—*

- (a) any applications that have been lodged with the local authority that would be competing applications if a substantive application for the project were lodged; and

...

- (6) Anyone who is invited to provide written comments under this section has 20 working days from the receipt of the copy of the application to do so.

1.3 Assessment against regional policy statement and regional plans

Regional Policy Statements

6. The referral application does not contain a detailed assessment of the project against the relevant provisions of the pORPS or the ORPS. This assessment is required within the substantive application.

Water Plan

7. Based on the information provided, the following activities may require resource consent under the Water Plan:

Discharge of water (stormwater):

8. The discharge of stormwater to the Silverstream is proposed within the application. If the activity cannot meet the permitted activity rules within Rule 12.B.1 consent would be required under 12.B.3.1 as a restricted discretionary activity. Council's discretion is restricted to the matters specified in the rule and includes consideration of the relevant values listed in Schedule 1 of the Water Plan¹.
9. If a resource consent is required under Rule 12.B.3.1, assessment of the matters of discretion within 12.B.3.1 would be required as part of the application. This would include and assessment of the following matters:
- a. A description of the nature of the stormwater discharge, including its source, the contaminants that may become entrained in the discharge, such as sediment, nutrients, hydrocarbons, metals or other chemicals.
 - b. A description of the volume, rate and method of the discharge and treatment options for the discharge (e.g: interceptor sumps, treatment basins, soakage pits, proprietary treatment devices, swales).
 - c. Identification of the discharge point or area (to land or to surface water), and any alternative receiving environments.
 - d. An assessment of:
 - i. The likelihood of erosion, land instability, sedimentation or property damage as a result of the discharge and the potential for soil contamination.

¹ Specific values are listed in the Otago Regional Council's pre-application consultation feedback

- ii. Any adverse effects on the relevant values listed in Schedule 1, amenity and heritage values for the Silver Stream and natural character of the Silver Stream. Any existing lawful activity associated with the Silver Stream.
- iii. The duration of the stormwater discharge and any monitoring or maintenance requirements.
- e. Assessment against the relevant objectives and policies of the Regional Plan (e.g. Water Plan), including those relating to water quality, discharge management, and the protection of ecological and cultural values.
- f. Consideration of tangata whenua values, and whether any consultation has been undertaken regarding potential effects on mahinga kai, wāhi tapu, or the mauri of water.

Discharge of water (other than stormwater)

10. If there is a discharge of water (other than stormwater) or a contaminant, consent would be required under 12.B.4.1 as a discretionary activity (as the site would be an industrial or trades premises).
11. If a resource consent is required under Rule 12.B.4.1, the following assessment would be required:
 - a. A description of the type of water or contaminant being discharged, including its source (e.g., washwater, dewatering water), volume, rate, frequency, and duration of discharge.
 - b. An assessment of any contaminants present in the discharge, including sediment, nutrients, hydrocarbons, metals, or other chemicals, with reference to relevant water quality standards or guidelines.
 - c. Description of the receiving environment, including its sensitivity, current use, and existing water quality or ecological values (eg: values listed in Schedule 1 of the Water Plan).
 - d. Evaluation of the actual and potential effects of the discharge on the receiving environment, including cumulative effects, and whether it could result in adverse effects such as contamination, degradation of water quality, or impacts on aquatic life.
 - e. Details of proposed mitigation measures to avoid, remedy, or mitigate adverse effects, such as treatment systems (e.g., sediment traps, filtration, oil and grit interceptors or proprietary treatment devices), discharge controls, or containment measures. This should include the design specifications and sizing of the treatment system and any ongoing maintenance requirements.
 - f. Identification of the best practicable option to prevent or minimise adverse effects.

- g. Assessment against the relevant objectives and policies of the Regional Plan (e.g. Water Plan), including those relating to water quality, discharge management, and the protection of ecological and cultural values.
- h. Consideration of tangata whenua values, and whether any consultation has been undertaken regarding potential effects on mahinga kai, wāhi tapu, or the mauri of water.

Drilling of land

- 12. The site is located over the Lower Taieri Aquifer identified in the C-series maps. If the drilling of land over an aquifer is required, other than for the purpose of creating a bore or within the bed of any river, resource consent would be required as a controlled activity under Rule 14.2.2.1.
- 13. If resource consent is required under Rule 14.2.2.1 an assessment of the matters of control within Rule 14.2.2.1 would be required as part of the application.

Defence against water

- 14. “Defence against water” is defined in the Water Plan as:

Any dam, weir, bank, carriageway, groyne, or reservoir, and any structure or appliance of any kind which has or may have the effect of stopping, diverting, controlling, restricting, or otherwise regulating the flow or spread or subsidence, in or out of a water body, of water including flood waters, which is specifically established for the purpose of flood hazard mitigation.

- 15. If a defence against water is required, due to floodwater being directed into channels by bunds, resource consent would be required under Rule 14.3.2.1 as a discretionary activity.
- 16. If a resource consent is required under Rule 14.3.2.1, the following assessment would be required:
 - a. An explanation of the structure’s role as a defence against water, including how it contributes to flood hazard mitigation.
 - b. Assessment of the effects on the natural flow regime, including potential upstream or downstream impacts, increased flood risk, or changes to the duration and extent of inundation. This should include an assessment of the potential effects on the existing East Taieri Drainage Scheme and Lower Taieri Flood Protection Scheme and also confirmation that the proposed works will not exacerbate flooding on adjacent or downstream properties or sites.
 - c. Evaluation of the effects on water quality, aquatic ecosystems, and natural character of the waterbody. This includes sedimentation, vegetation clearance, or disturbance to aquatic habitat during construction or operation.

- d. An assessment of consistency with the relevant objectives and policies of the Water Plan, particularly those related to flood hazard management, natural character, and integrated management of land and water resources.
- e. Confirmation that the structure is designed and will be maintained to perform its intended function, including evidence of engineering input where relevant.

Damming or diversion of water

17. “Divert” is defined in the Water Plan as:

In relation to the diversion of water, is the process of redirecting the flow of water from its existing course to another.

- 18. If the damming or diversion of flood water is required, the application will need to meet the permitted activity rules within Rule 12.3.2. If the permitted activity rules cannot be complied with, resource consent would be required under Rule 12.3.4.1 as a discretionary activity.
- 19. If a resource consent is required under Rule 12.3.4.1, an assessment similar to that required for defence against water processes would be required.

Bore construction

- 20. The referral application does not specify whether the site will be connected to a reticulated water supply. As the site is located within a water supply zone boundary within the Water Services map, it is assumed that connection to the reticulated network will occur.
- 21. The Water Plan defines a “bore” as:

Every device or means, including any well or pit, which is drilled or constructed for the purpose of taking groundwater, or which results in groundwater being taken, other than piezometers or other monitoring devices used for water sampling purposes only.

- 22. If temporary dewatering of groundwater during construction is required or a bore is required to obtain groundwater for other uses, consent would be required under Rule 14.1.1.1 for the construction of a bore as a controlled activity.
- 23. If a resource consent is required under Rule 14.1.1.1 assessment of the matters of control within Rule 14.1.1.1 would be required as part of the application.

Take and use of surface water and/or groundwater (including groundwater hydraulically connected to Silver Stream)

- 24. The site is located within the Lower Taieri – East Aquifer and groundwater allocation is currently available. Silver Stream is located within the Taieri Catchment and is currently fully allocated.

25. Policy 6.4.1A sets out a method to determine how to allocate groundwater when it is hydraulically connected to surface water. It requires a groundwater take be allocated as:
- a. A surface water take and subject to a minimum flow, if the take is within 100 metres of any connected perennial surface water body; or
 - b. Groundwater and part surface water if the take is 100 metres or more from any connected perennial surface water body, and depletes that water body most affected by at least 5 litres per second determined in accordance with Schedule 5A; or
 - c. Groundwater if the above scenarios do not occur.
26. If construction phase dewatering is required or groundwater is required to be obtained for other uses (such as to provide supply to the site or for dust suppression purposes), and the taking and use of groundwater is within 100 metres of Silver Stream (if it is not considered connected) or is greater than 100 metres or more from Silver Stream and depletes the water body by less than 5 litres per second as determined in accordance with Schedule 5A, it is able to be allocated as groundwater.
27. Rule 12.2.2.2. provides a permitted activity pathway for the take and use of groundwater. If the permitted standards are able to be achieved, the activity may be permitted. Where the standards of Rule 12.2.2.2 are unable to be met, the take and use of groundwater may require resource consent as a discretionary activity in accordance with Rule 12.2.4.1. The following matters will require assessment:
- a. The rate frequency, timing and frequency of groundwater to be used and the method of abstraction, delivery and use of groundwater taken.
 - b. The location where the groundwater take will occur.
 - c. The volume of groundwater sought and the impact of that volume on the aquifer, including the hydrodynamic properties of the aquifer and vulnerability of the aquifer to compaction.
 - d. An assessment of whether any part of the take would constitute allocation from the Silver Stream and the availability of that allocation (noting that the Taieri Catchment is overallocated).
 - e. An assessment of the actual and potential effects of the abstraction and use, including any bore interference effects.
 - f. An assessment of consistency with the relevant objectives and policies of the Water Plan, particularly those related to groundwater abstraction and use.
 - g. Consideration of tangata whenua values, and whether any consultation has been undertaken regarding potential effects on mahinga kai, wāhi tapu, or the mauri of water.

28. If the groundwater abstraction is within 100 metres of a connected surface water body (Silver Stream) the take will be fully allocated to surface water. If the groundwater abstraction is greater than 100 metres from a connected surface water body and contributes to depletion greater than 5 litres per second, it can be partially allocated to surface water and groundwater.
29. The Taieri Catchment is fully allocated. Rule 12.0.1.2 provides a direct prohibited activity status for a resource consent application that seeks to take water as primary allocation whether that take would cause the primary allocation of a catchment to exceed the relevant limit in Policy 6.4.2.
30. The Water Plan includes provisions for the taking of supplementary allocation. Policies 6.4.9 and 6.4.10 sets out a methodology for determining supplementary allocation, where appropriate. Rule 12.1.4.7 applies to the taking and use of surface water as supplementary allocation within the Taieri Catchment as a restricted discretionary activity. An application for resource consent under this rule would require an assessment against the matters of Rule 12.1.4.8.

Waste Plan

31. The site is not listed on the Otago Regional Council - Listed Land Use Register. However, if the site (or a portion of the site) is contaminated and earthworks are required, which will disturb the site, consent would be required for disturbance of a contaminated site under Rule 5.6.1.
32. If a resource consent is required under Rule 5.6.1, the following assessment would be required:
 - a. A description of the proposed earthworks, including location, depth, area, and duration of the disturbance.
 - b. Identification and characterisation of the nature and extent of contamination present on the site, supported by a Preliminary Site Investigation or Detailed Site Investigation.
 - c. An assessment of the risks posed by the disturbance to, groundwater, surface water, and ecological receptors, including potential migration of contaminants.
 - d. Details of proposed management or mitigation measures, including a Contaminated Site Management Plan or Remediation Action Plan if required, addressing containment, removal, treatment, or off-site disposal of contaminated material.
 - e. Identification of any off-site disposal facilities proposed to receive contaminated soil, and confirmation that they are appropriately consented.
 - f. Evaluation of consistency with the relevant objectives and policies of the Otago Regional Plan: Waste, particularly those seeking to minimise the risk of contaminant discharges and protect environmental and human health.

- g. Consideration of cultural effects and consultation undertaken with tangata whenua, particularly where contaminated land may affect culturally sensitive sites or values.

Air Plan

- 33. The details of the activity are largely unknown, and as such, a full assessment of the activity against the Air Plan will be required within the substantive application. Based on the information provided within the referral application, the following rules might be applicable.

Industrial or trade process

- 34. The Air Plan defines “Industrial or trade process” as:

Includes every part of a process from the receipt of raw material to the dispatch or use in another process or disposal of any product or waste material, and any intervening storage of the raw material, partly processed matter, or product.

- 35. If the activity includes industrial or trade processes, consent may be required under Rule 16.3.5.9 as a discretionary activity. This would include discharges of dust, particulate (PM₁₀), odour and any other air borne contaminants.

- 36. Rule 16.3.5.2 permits the discharge from the sorting, crushing, screening, conveying and storage of powdered or bulk products where the outdoor storage of bulk products is less than 1,000 m³ if located on a site in Air Zone 2, and the crushing and screening of bulk materials is at a rate less than 100 tonnes an hour.

- 37. If a resource consent is required under Rule 16.3.5.9, the following assessment would be required:

- a. A detailed description of the industrial or trade process, including all activities on site that may result in the discharge of dust, particulates, odour or other contaminants to air.
- b. Identification of the type, source, and characteristics of the discharge, including the nature and volume of contaminants (e.g. dust, odour, fumes) and how frequently discharges are expected to occur (via a FIDOL assessment or similar methodology).
- c. Assessment of the potential effects of the discharge on ambient air quality, including the proximity of sensitive receptors such as residential dwellings, schools, or community facilities.
- d. Evaluation of the site’s location, including prevailing wind conditions, topography, and any existing air quality monitoring data.
- e. Proposed mitigation measures to manage and minimise discharges to air, such as dust suppression systems, water sprays, enclosures, covers, or vegetation buffers.
- f. Consideration of cumulative effects in combination with other existing discharges to air in the surrounding area.

- g. Assessment of consistency with the objectives and policies of the Regional Plan: Air, particularly those seeking to maintain ambient air quality and avoid, remedy or mitigate adverse effects on health and amenity.
- h. Consideration of any cultural effects where discharges may affect areas of cultural or spiritual significance, and a summary of any consultation with tangata whenua.

Petroleum and hydrocarbons

38. Rule 16.3.5.7(2) of the Air Plan permits the discharge of contaminants into air from the handling and storage of hydrocarbons at bulk terminals provided any discharge of odour or gases is not noxious, dangerous, offensive or objectionable at or beyond the boundary of the property.

Ventilation or vapour displacement

39. Rule 16.3.11.1 of the Air Plan permits discharge of contaminants into air from:
- a. tanks used for the storage of liquids, excluding the storage of hydrocarbons as permitted by Rule 16.3.5.7 on any industrial or trade premises: or
 - b. the venting of gas pipelines, pumps, compressors, tanks or associated equipment when released for the purposes of refilling, servicing or repair, on any industrial or trade premises,
- provided any discharge of odour or particulate matter is not noxious, dangerous, offensive or objectionable beyond the boundary of the property.
40. If the permitted activity standards are unable to be met, the discharge will require resource consent as a discretionary activity under Rule 16.3.11.2. If resource consent is required, an assessment similar to that required for discharges to air from industrial or trade processes would be required.

General permitted activities

41. Rule 16.3.13.1 of the Air Plan permits discharges from miscellaneous activities, including vehicle engine maintenance and servicing, or building and construction activities, provided any discharge of smoke, odour, particulate matter or gas is not noxious, dangerous, offensive or objectionable at or beyond the boundary of the property.
42. If the permitted activity standard is unable to be met, the discharge will require resource consent as a discretionary activity under Rule 16.3.14.1. If resource consent is required, an assessment similar to that required for discharges to air from industrial or trade processes would be required.

Discharges of PM10

43. Rule 16.3.15.5 of the Air Plan requires resource consent as a discretionary activity for the discharge of PM10 to air in an airshed providing:
- a. The concentration of PM10 in the airshed does not breach its ambient air quality standard; or

- b. The granting of the resource consent is not likely, at any time, to cause the concentration of PM10 in an airshed to breach its ambient air quality standard.
- 44. If resource consent is required under this rule an assessment similar to that required for discharges to air from industrial or trade processes would be required. In addition, an assessment would also need to assess the extent to which the discharge to air may contribute to a breach of the ambient air quality standard in the polluted airshed.

Kāi Tahu Ki Otago Natural Resource Management Plan 2005

- 45. The application will require assessment against the relevant objectives and policies in the Kāi Tahu ki Otago Natural Resource Management. This assessment should include consideration of the following:
 - a. Region-wide objectives and policies in Section 5.2; and
 - b. Taieri specific objectives and policies in Section 9.

Flood Protection Management Bylaw 2022

- 46. Scheduled drains for East Taieri are located parallel to the western site boundary. Any alteration (including the construction of structures, deposition of material, obstruction or connection via a pipe channel or other conduit) will require approval from the Council under the Flood Protection Management Bylaw.
- 47. Applications for approvals under the bylaw require use of a prescribed form. When considering approval under the bylaw, the Council is able to consider the following matters to ensure effective operation and integrity of the flood protection works:
 - a. Capacity;
 - b. Stability, scour and erosion risk;
 - c. Access for inspection and maintenance purposes;
 - d. Duration of approval; and
 - e. Water quality.

1.4 Assessment against relevant national planning documents

- 48. Based on the information provided, the following national planning documents may be relevant:

National Policy Statement for Freshwater Management 2020 (NPS-FM)

- 49. The referral application does not contain a detailed assessment of the project against the relevant provisions of NPS-FM. This assessment is required within the substantive application.

National Environmental Standards for Air Quality (NES-AQ)

50. The site is located within a gazetted polluted airshed boundary, as defined under the (NES-AQ). As such, any new discharge to air from within this airshed must be assessed against Regulation 17, which restricts the granting of resource consent for activities that would increase PM10 emissions unless certain criteria are met.

National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023 (NES-GGEIPH)

51. If the application contains fossil fuel-fired heat devices, an assessment of the NES-GGEIPH will be required.

Resource Management (National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat) Regulations 2023 (NES-GGEIPH)

52. If industrial process heat devices are proposed for the site, the relevant regulations of the NES-GGEIPH will require consideration. If resource consent is required, the following information is required:
- a. Consideration of whether a site wide approach is required; and
 - b. The content and adequacy of an emissions plan (including a review of the emissions plan by a suitably qualified person) to ensure the matters in Regulation 15 are addressed.
53. If resource consent is required as a restricted discretionary activity, the following matters require assessment:
- a. The best practical option to minimise or prevent any actual or likely adverse climate change effects and any energy efficiency improvements;
 - b. Any emissions reduction target and the content of an emissions plan; and
 - c. Requirements for monitoring and reporting of the activity to the Council.

Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F)

54. If works near or within natural inland wetlands are required as part of the proposal, Regulations of the NES-F may be relevant for assessment.

Construction, operation and maintenance of specified infrastructure or other infrastructure

55. Based on the information provided, if there are any natural inland wetlands within or near the site and works are for the purpose of constructing 'specified infrastructure' is proposed, Regulation 45 may be relevant and resource consent would be required as a discretionary activity. The Regulation applies to any vegetation clearance, earthworks or land disturbance within or within 10 metres of a natural inland wetland, any earthworks or land disturbance outside of 10 metres but within 100 metres of a natural inland wetland and any take, use, dam, discharge or diversion within or within 100 metres of a natural inland wetland.

56. If resource consent is required, an assessment will be required as follows:

- a. Whether the infrastructure is 'specified infrastructure' as defined by the NES-F.
- b. The extent and values of the wetland and the nature, scale, location, intensity and timing of the activity.
- c. The actual and potential effects the activity may have on the natural inland wetland including any impact of the hydrological function or change in water level.
- d. Any measures to avoid, remedy or minimise adverse effects on the wetland and an assessment of how the activity will be managed through applying each step of the effects management hierarchy. If aquatic offsetting or aquatic compensation is required, an assessment of principles 1 to 6 in Appendix 6 and 7 of the NPSFM.

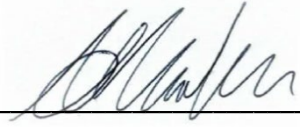
57. If any vegetation clearance or earthworks within or within 10 metres of a natural inland wetland is required, or any take, use, damming or discharge of water within or within 100 metres of a natural inland wetland is required for the maintenance or operation of specified infrastructure or other infrastructure, resource consent may be required. Regulation 46 provides the permitted standards for this activity, where these are unable to be met, resource consent will be required as a restricted discretionary activity. An application for resource consent will require assessment of the same matters as set out in relation to Regulation 45 above.

Drainage of natural inland wetlands

58. If the proposal includes earthworks or the taking, use, damming or diversion of water outside, but within a 100 metre setback from a natural inland wetland that results, or is likely to result, in the complete or partial drainage of all or part of a natural inland wetland, and the drainage does not have another status under the other regulations of the NES-F, it requires resource consent as a non-complying activity under Regulation 52.

59. If resource consent is required, the following matters will require assessment:

- a. The extent and values of the wetland and the nature, scale, location, intensity and timing of the activity.
- b. The actual and potential effects the activity may have on the natural inland wetland, including any impact on the hydrological function or change in water level.
- c. Any measures to avoid, remedy, or minimise adverse effects on the wetland and an assessment of how the activity will be managed by applying each step of the effects management hierarchy. If aquatic offsetting or aquatic compensation is required, an assessment of principles 1 to 6 in Appendix 6 and 7 of the NPSFM.



Andrew MacLennan, **Consultant Planner**



Hannah Goslin, **Consultant Planner**

Hon James Meager

Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport



2 July 2025

JMITC - 1

Hon Chris Bishop
Minister for Infrastructure

By email: infrastructure.portfolio@parliament.govt.nz

Dear Minister Bishop

Thank you for your email of 6 June 2025 and for the opportunity to comment on Southern Link Property Limited's (SLPL's) application for referral under the Fast-track Approvals Act 2024 (the Act).

This letter provides comments in my capacity as both Minister for the South Island and Associate Minister of Transport, under section 17(1)(b) of the Act. When reviewing the application, I have considered whether the project will:

- contribute to economic growth in the South Island, regionally, and thereby nationally
- enable key infrastructure to meet regional needs.

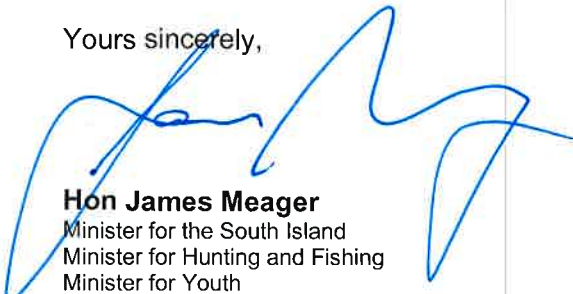
I understand that SLPL has lodged an application for referral for the proposed Southern Link Inland Port project in North Taieri, which is a major infrastructure project intended to support Port Otago's freight operations and improve regional logistics.

I note that the project has been approved \$8.2 million in funding through the Regional Infrastructure Fund to support the development of key infrastructure such as a new rail siding, warehousing, container handling facilities, and a hydrogen fuel depot. My view is that this will broadly align with the Government's priorities for economic growth.

I consider the development of this project will likely deliver economic benefits to the South Island as the project is expected to generate up to \$100.0 million in investment, where 86 per cent of the investment will be in the Otago Region. Additionally, the Economic Assessment Summary prepared by Savvy Economics in April 2025 suggests that the project is forecasted to create approximately 551 direct and indirect full-time equivalent (FTE) jobs during construction, and 55 ongoing FTE jobs once construction is complete. In my view, this constitutes a substantial economic contribution to the Otago Region, and the South Island more broadly, as it contributes to regional employment and supply chain resilience.

I note that the proposed site is located on highly productive land, and there is limited comparative analysis with the nearby Milburn Quadrant Inland Port, a large-scale private development. These factors may require further consideration when assessing the project's regional significance.

Yours sincerely,



Hon James Meager
Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport



30 JUN 2025

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act referral applications: Lake Pūkaki Hydro Storage and Dam Resilience Works (FTAA-2503-1036) and Southern Link Inland Port (FTAA-2505-1059)

Dear Chris

Thank you for the opportunity to comment as Minister for Economic Growth on these applications referred under the Fast-track Approvals Act 2024 (the Act). I have considered whether these applications are likely to have 'significant economic benefits', under s22(2)(a)(iv) of the Act, based on the information provided in the application. I will leave it to you and other relevant Ministers to assess the other criteria.

Out of Scope

Southern Link Inland Port, FTAA-2505-1059

This proposal involves the construction and operation of a comprehensive inland port and logistics hub in Dunedin to service Port Otago. It is expected to provide consolidated logistics services for South Island's exporter and importers, increase warehousing and container capacity and address the approaching expiration of leases on Port Otago's offsite container depot.

The applicant provided an economic assessment report on the construction and operation of the port. It estimates \$79.4 million in GDP value add from direct construction expenditure on key infrastructure (\$71.5 million in the Otago region) and 613 FTE jobs during the construction stage (551 FTE jobs in the Otago region). Its operation is estimated to support long-term employment of 76 FTE jobs.

This project could have substantial economic impacts for Dunedin and the wider Otago region in the short to the medium term. Country-wide economic benefits could arise from efficient supply chains supporting the growth of the trade sector. Broadly, enabling investment in this type of infrastructure (which facilitates the efficient movement of goods and services and reduces congestion on Dunedin's roads) will support economic growth in the economy.

Sincerely

A handwritten signature in black ink, appearing to read 'Hon Nicola Willis', written in a cursive style.

Hon Nicola Willis
Minister for Economic Growth

Hon Penny Simmonds

Minister for the Environment
Minister for Vocational Education
Associate Minister for Social Development and Employment



PS-COR1338

Hon Chris Bishop
Minister for Infrastructure
c.bishop@parliament.govt.nz

Dear Chris

Thank you for the invitation to provide comments on the application for referral of the Southern Link Inland Port to an expert panel under section 17 of the Fast-track Approvals Act 2024 (FTAA).

Having reviewed the referral application, I have some comments about the level of information provided to determine the significance of potential adverse environmental effects of the project.

The applicant will be required to provide more detailed assessments at the substantive stage. It would be more efficient to identify as soon as possible if there are likely to be significant adverse effects from the project. This would enable appropriate strategies to avoid, remedy or mitigate them to be considered throughout the detailed design process of the proposal prior to lodging the substantive application.

You may wish to use your discretion to specify information that is required to be provided with the substantive application under section 27(3)(b)(ii) of the FTAA. This would ensure the most streamlined process for the applicant.

I suggest the following could be specified to support a thorough and evidence-based determination on the significance of effects at the substantive stage:

- a. how any impacts on HPL can be minimised or mitigated.
- b. an ecological assessment of permanent site operation effects by a suitably qualified person, including
 - i. a baseline assessment of indigenous biodiversity values of the receiving environment, including Silver Stream and vegetation on site
 - ii. an assessment of the risk to those values from the proposed activities
 - iii. measures proposed to avoid, remedy and/or mitigate the above effects
- c. an assessment of any risk to drinking water supply from permanent effects of site operation, including
 - i. a survey assessing the locations and treatment capabilities of all registered and unregistered drinking water supplies (including domestic self-supplies) downstream or downgradient of the project site

- ii. hydrological modelling of both surface water and groundwater conditions to assess the flow pathways and attenuation of any potential contaminant discharge
 - iii. measures to notify downstream or downgradient drinking water suppliers as soon as reasonably practicable following any event which could potentially have a significant adverse effect on drinking water quality
- d. additional information regarding the potential hazardous substances to be stored and handled on site, including
 - i. extent to which they will be part of the proposed activity
 - ii. indicative types and volumes of hazardous substances
 - iii. measures proposed to protect groundwater and local waterbodies

This approach will reduce the risk of unanticipated significant matters being identified late in the process and support the smooth and efficient conduct of the expert panel's deliberations and the process for the applicants.

Thank you again for the opportunity to provide comments on this referral application.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Penny Simmonds', with a stylized, cursive script.

Hon Penny Simmonds
Minister for the Environment

Hon Shane Jones

Minister for Oceans and Fisheries
Minister for Regional Development
Minister for Resources
Associate Minister of Finance
Associate Minister for Energy



2 July 2025

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act referral application – Southern Link Inland Port (FTAA-2505-1059)

Dear Chris

Thank you for the opportunity to comment on the Southern Link Inland Port application for referral under the Fast-track Approvals Act (FTAA-2505-1059).

This letter provides comments in my capacity as Minister for Regional Development. Based on Section 22 of the FTAA 2024, I have considered the project in terms of whether it:

- a. will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure
- b. will deliver significant economic benefits.

Southern Link Property Limited has applied for Fast-track approval to establish a comprehensive Inland Port based in Mosgiel to service Port Otago. Proposed works include 80,000 square metres of warehousing, 10 hectares of container storage and depots, break bulk storage facilities and a rail siding to enable a rail freight shuttle service to Port Chalmers and the wider rail network.

As you will be aware, the Southern Link Inland Port project received \$8.2 million of Regional Infrastructure Fund (RIF) funding toward the rail siding component of the project earlier this year. RIF funding is conditional on the project receiving the consents it requires.

I consider that the regional and national economic benefits of the project are likely to be significant. The project could contribute to the growth of primary and other export industries in Otago and surrounding regions by both increasing freight capacity and lowering freight costs in the lower South Island. The improvement in container storage capacity would also provide resilience to shipping delays for export industries. Within the Dunedin urban area, the project would also free up industrial land currently used for container storage for more high-value uses.

I note that Calder Stewart has recently announced it is proceeding with a \$3 billion development of Milburn Quadrant Intermodal hub, another larger inland port development in the region. I recommend clarification is sought on the extent that Milburn Quadrant Intermodal Hub would be competing with Southern Link Inland Port for freight volumes, and the potential impact of having both inland ports operating in the region.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'S. Jones'.

Hon Shane Jones
Minister for Regional Development

From: [Infrastructure Portfolio](#)
To: [FTAreferrals](#)
Subject: FW: Minister for Climate Change comment on Fast Track - Southern Link Inland Port project (FTAA-2505-1059)
Date: Tuesday, 8 July 2025 9:41:25 am

Morning team, please find comments from Minister of Climate Change below

From: Emily Young [s 9\(2\)\(a\)](#)
Sent: Tuesday, 8 July 2025 9:29 AM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Cc: Steve Mason [s 9\(2\)\(a\)](#)
Subject: Minister for Climate Change comment on Fast Track - Southern Link Inland Port project (FTAA-2505-1059)

Good morning team,

Please see below Minister Watts' comment on the Southern Link Inland Port Fast-track project in his capacity as the Minister of Climate Change:

This project could have significant regional benefits as it may lead to a decrease in emissions as well as increase the resilience to the region by providing infrastructure that may potentially support local recovery to natural hazard and climate events. More information will be provided in the substantive stage of the application allowing us to understand more of the adaptive measures of this project.

Thanks
Emily



Emily Young
Private Secretary | Office of Hon. Simon Watts
Minister of Climate Change | Minister for Energy
Minister of Local Government | Minister of Revenue

M: [s 9\(2\)\(a\)](#)
E: [s 9\(2\)\(a\)](#)
Parliament Buildings, Wellington 6160, New Zealand

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Southern Link Inland Port
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	NZ Transport Agency		
*First name	Nicola		
*Last name	Foran		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	environmentalplanning.nzta.govt.nz		

2. Please provide your comments on this application
NZTA thanks the Minister for the opportunity to comment on the referral of this application into the fast-track approvals process. NZTA has had pre-application engagement with the applicant regarding this project on 6 March 2025. This consisted of two NZTA representatives providing preliminary feedback on an Integrated Transport Assessment (ITA) supplied by the applicant. NZTA views positively the intent of this land use development proposal to facilitate a road to rail mode shift for freight movement to Port Otago, acknowledging that it could reduce road wear and tear, and perceived safety risks arising from existing heavy vehicle movements along urban areas of State Highway 1 and State Highway 88 in particular. However, it is noted in this application that the proposed land use development proposal is anticipated to increase heavy vehicle movements on State Highway 1 near Mosgiel, and State Highway 87 within Mosgiel. There are existing known issues on the state highway network getting into and out of Mosgiel. Specifically, there are low levels of service at some locations on the highway network at peak times, and the cumulative effects of the traffic

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generation arising from the proposal, combined with other greenfield proposed development in the Mosgiel area, is anticipated to compound this issue further.

Developments of this nature, which increase heavy vehicle movements within urban areas (SH87), may increase the safety risk, or perceived safety risk, to other motorists and vulnerable users such as pedestrians, cyclists and those using mobility devices in these urban areas. NZTA has a project in the National Land Transport Programme (2024-27 NLTP) to look at short term measures to optimise traffic flow into and out of Mosgiel, but this is a relatively small NLTP allocation at this point and would be unlikely to fully address the forecasted reduction in the levels of service along the network arising from known proposed developments in this locale, nor the potential/perceived safety risks of increased heavy vehicle movements along the urban areas of SH87.

NZTA would need to see the substantive application, including the final version of the ITA, to fully understand the potential adverse effects that the proposal would have on the state highway network and any mitigative measures necessary to address effects on the state highway network. NZTA would welcome the opportunity to provide comments on any substantive application in due course.

NZTA has no concerns with this project, Southern Link Inland Port, being referred into the fast-track approvals process.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Nicola Foran

4 July 2025

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Your written comments on a project under the Fast Track Approvals Act 2024

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All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Te Rūnaka Ōtākou		
*First name	Brett		
*Last name	Ellison		
Postal address	Tamatea Road, Ōtākou, Dunedin		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Thank you for giving notice that a request for referral to the Fast-Track Approvals process has been received by the Minister for Infrastructure, and for inviting comment. The referral application is made by Southern Link Property Limited (the Applicant) for the Southern Link Inland Port project, in the Taiari (Taieri) in Otepoti / Dunedin (the Project). The Taiari and the surrounding area have long been part of important associations and practises for Ōtākou and our Kāi Tahu whānauka, who hold intergenerational connections to the wai and whenua. Taiari is the correct spelling for the Taieri River located in Otago. From its source, the Taieri River flows almost entirely around Pātearoa (the Rock & Pillar Range) before discharging into Te Tai-o-Āraiteuru (the Otago coastline). The wider Taiari area is an important area for Kāi Tahu. There are numerous taoka (treasured) species, mahika kai sites, and fortified, permanent and seasonal settlements associated with the catchment's waterways, lakes and wetlands. The entire catchment was a significant food source for mana whenua and provided an abundance of resources from inland weka to coastal īnaka.

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The Kāi Tahu ki Otago Natural Resource Management Plan 2005 is the principal resource management planning documents for Kāi Tahu ki Otago and the embodiment of Kāi Tahu rakatirataka and kaitiakitaka. The kaupapa of the plans is 'Ki Uta ki Tai' (Mountains to the Sea), which reflects the holistic Kāi Tahu ki Otago philosophy of resource management. The plans express Kāi Tahu ki Otago values, knowledge and perspectives on natural resource and environmental management issues.

Mana whenua values in this area include but are not limited to wāhi taoka, mahika kai, ara tawhito. Threats to these values include, damming, activities affecting water quality; building and structures and utilities; earthworks; subdivision and development; new roads or additions/alterations to existing roads, vehicle tracks and driveways; commercial and commercial recreational activities.

We also note the primary location of Port Otago on the Otago Harbour. The Otago Harbour is a site of singular importance for Ōtākou and Kāi Tahu. It is a source of nourishment, a major highway, a sheltering location for human settlement, a burial place and a symbol carrying the ancestral, spiritual, and religious traditions of all generations prior to European settlement.

There is an unbroken tradition of connection with the waterways and the adjacent land for a thousand years.

The strategic importance of the harbour to mana whenua is shared by Port Otago, and we acknowledge the long-standing relationship with the Port.

Comment

Te Rūnanga o Ōtākou Incorporated (Ōtākou) want to note that it supports the referral application in its current form and look forward to providing a more detailed response when the applicant lodges their substantive application.

Ōtākou note that the applicant has engaged proactively with mana whenua and that the applicant and ngā rūnaka (Puketeraki and Moeraki) have entered into a Process Agreement from which to support exchange of technical reports and increased understanding for mana whenua on potential impacts on cultural values.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

Brett Ellison

Chair, Te Rūnaka Ōtākou Ltd

Date 8 July 2025