

S53 Specialist Response – Substantive Application

1. Application Summary

Project Name	Southern Link Inland Port
Applicant	Port Otago
Site Address	270-292 Dukes Road North, North Taieri.
Fast-track Reference Number	FTAA-2604-1207
Council reference numbers	-
Description of Proposal	Establish and operate an inland port/ logistics hub facility. The earthworks proposed are anticipated as 120,000 m ³ cut, a further 126,100 m ³ for topsoil removal and 78,200 m ³ fill over an area of 42.3 ha.

2. Specialist Response Details

Author: Jason Smith

Specialist Area: Earthworks (erosion and sediment control), consultant to Otago Regional Council (ORC).

Date: 27/07/26

3. Specialist Assessment

The scope of this memorandum is to review the application in respect to section 53 of the Fast Track Approvals Act 2024. From an earthworks perspective, I have reviewed the application for FTAA-2604-1207. Of particular relevance to this assessment are:

- *Southern Link Property Limited Southern Link Inland Port Substantive Application Report*, report prepared by Southern Link Property, dated 17 April 2026.
- *Southern Link Inland Port Civil Works and Earthworks*, report prepared by Stantec New Zealand, revision FINAL, dated 16 April 2026.
- *Southern Link Inland Port DRAFT Construction Management Plan (CMP), Groundwater Assessment*, report prepared by Southern Link Inland Port, dated, revision 2, dated 14 April 2026.
- *Southern Link Inland Port Freshwater Ecological Impact Assessment*, report prepared by e3 Scientific, revision Final v2, dated 16 April 2026. **(FWEcIA)**
- *Southern Link Inland Port Geotechnical Desktop Study and Appraisal*, report prepared by Stantec New Zealand, revision 3, dated 15 April 2026.
- *Southern Link Inland Port Groundwater Assessment*, report prepared by Stantec New Zealand, revision 3, dated 16 April 2026.
The plan set: *Southern Link Inland Port Developed Consent Design*, plans prepared by Stantec New Zealand, revision D, dated 15 April 2026.
- The draft conditions, sourced from:
https://www.fasttrack.govt.nz/_data/assets/pdf_file/0020/29333/Part-C.02-Updated-

[Proposed-Conditions-Otago-Regional-Council-Tracked-Change-Version.pdf](#). Accessed 20 July 2026.

From an earthworks perspective, the application material is considered largely complete. There is sufficient information provided to understand the site context, the proposed works, the potential effects (as they relate to the earthworks) and the measures proposed to address the potential effects.

A draft Erosion and Sediment Control Plan (ESCP) has been provided that outlines how the earthworks would be undertaken to minimise the potential for erosion to occur and to manage any sediment-laden flows that do result. The applicant has identified the relevant industry best practice guideline for erosion and sediment control, being Auckland Council Guideline Document 2016/005: *Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Auckland Region* (GD05). The draft ESCP provides a sufficient level of detail to understand how the earthworks would be managed in accordance with GD05.

There is a comment in the construction management plan (at section 8.11.1) that chemical treatment is not anticipated to be used on this project. Chemical treatment is widely used across New Zealand, and is industry best practice, on Sediment Retention Ponds (SRPs) and Decanting Earth Bunds, as it maximizes the sediment removal efficiency of these devices. Chemical treatment is particularly effective in managing clay-sized particles and silts that are part of the material that would be worked in this area. The application material provided no details that could confirm that chemical treatment would not be effective. I have therefore included a recommendation below for a condition of consent to this effect.

There is a comment in the construction management plan regarding the size of the contributing catchment to the SRP during stage 1 being in excess of 5 ha. This is in excess of the limit recommended in GD05 and contrary to the ESCPs submitted elsewhere in the application material. This is not considered a material issue as the proposed conditions give ORC sufficient recourse to address any minor departures from GD05 in the construction issue ESCP.

There are remaining points of detail, not material to forming this assessment. These matters of detail are regarding the draft conditions, the cut and fill volumes (that vary across some of the material) and what the regulator needs to certify the various management plans. Further assessment is provided below on the proposed conditions. The small-scale variance in the earthwork volumes is not of sufficient scale to be of concern for this assessment and the certification role is clearly detailed in the proposed condition set.

Overall, I consider that the potential effects, as they relate to regional earthworks, can be appropriately managed, largely as proposed in the application material, or otherwise addressed through conditions of consent including those recommended by the applicant.

4. Comment on Proposed Conditions

The applicant has provided proposed consent conditions. These have been provided, commented upon and updated with input from ORC previously.

The most significant issue remaining, is a thematic issue with how the proposed 'Resource Consent B' conditions contain the proposed conditions for the discharge of stormwater for both the construction and operational phases. Although the latest set of proposed conditions includes headers to separate these distinct phases, it is not always clear what phase is being associated, and some conditions have been incorrectly grouped.

I would recommend that the construction and operational discharge consent conditions are separated as separate consent conditions and/or sperate consents.

Otherwise, my comment on the 'Resource Consent B' conditions are:

Applicant's numbering	Assessment
B.10	B.10.2 - the reference to the temporary Sediment Retention Ponds being mucked out when at 20% capacity (i.e. when they are 20% full of sediment) is the correct standard and aligns with GD05. However, a 20% capacity would be much earlier than the subsequent sub-points (a), (b) and (c). This is a contradiction within the condition, the difference would materially impact on the functioning of the SRP and hence the subpoints should be removed (or separated into a separate condition for the operational phase of stormwater discharge).
B.26, B.27	These water quality parameters do not include a measure for deposited fine sediment, which is recommended to be monitored in the FWEcIA. This matter has been raised to ORCs reviewing ecologist (Beca) and I will defer to their assessment in this regard. However, I reiterate that the monitoring of deposited fine sediment would be an appropriate monitoring tool for measuring potential effects arising from the earthworks.
B. 32	Although this condition is under the 'operational' stormwater consent conditions, it is referring to construction monitoring. A useful measure for monitoring sediment impacts would be of the deposited fine sediment <i>cover</i>, which is usually measured as a percentage (and can be directly measured by one of the Sediment Assessment Monitoring (SAM) methods as used in the FwEcIA).

5. Recommended conditions:

- X. Prior to the commencement of earthworks activity on the subject site, the consent holder must submit a finalised Chemical Treatment Management Plan (CTMP) prepared in accordance with GD05 and submitted to the Council for certification.

No earthwork activities must commence until certification is provided by the Council that the CTMP meets the requirements.

The CTMP must include as a minimum:

- a. Specific design details of chemical treatment system based on a rainfall activated dosing methodology for the site's sediment retention ponds and decanting earth bunds;
- b. Monitoring, maintenance (including post-storm) and contingency programme (including a record sheet);
- c. Details of optimum dosage (including assumptions);
- d. Results of initial chemical treatment trial;
- e. A spill contingency plan; and
- f. Details of the person or bodies that will hold responsibility for long term operation and maintenance of the chemical treatment system and the organisational structure which will support this system.
- g. A plan for updating the CTMP as earthworks progress.

If bench testing demonstrates that chemical treatment would not be beneficial in promoting sediment deposition, then a CTMP will not be required unless required under condition **X(g)**.

6. Supporting Documents

N/A