

Applicant Responses to Relevant Comments from Iwi on the Southern Link Inland Port Project

This document addresses comments in the Treaty Impact Assessment for the SLIP from the following parties:

> Te Rūnanga o Otākou

Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Benefits			
The development will enable Port Otago to continue to honour its “no more reclamation” commitment.	Legal	Part A.02 – Substantive Application Report, page 6-7 & 25 Legal Submissions	Granting of the consents will provide for sustainable long-term growth of Port Otago’s container operations. Matters relating to any reclamation commitments by POL are addressed in the Legal Submissions.
The commitment to no more reclamation and the reconfiguration of port activities presents an opportunity for the harbour environment to once again become the key taonga for Dunedin City.	Legal	Part A.02 – Substantive Application Report, page 6-7 & 25 Legal Submissions	Refer to the Legal Submissions regarding reclamation commitment.
Economic transformation and employment.	Economics	Part A.02 – Substantive Application Report, page 26	SLPL agrees that the SLIP will support future economic growth as Port Otago is a critical economic driver for the Otago Region, and the proposed SLIP provides a strategic solution to the logistics issues. The SLIP is expected to sustain approximately 1,489 jobs nationally over the 10-year construction timeframe and approximately 21 transferred positions and 104 net additional high-value permanent jobs during operation.
Reduced road freight and emissions: Reduced truck movements and a shift from road to rail aligns with	Transportation	Part A.02A - Southern Link Inland Port –	SLPL agrees that the SLIP aligns with climate mitigation objectives as the shift from road to rail will result in reductions



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climate mitigation objectives while reducing pressure on roads.		Substantive Application Report, Section 2.2.5 Attachment 16 SOE of Mr Horan, Section 2	to greenhouse gas emissions (e.g. predicted 70% CO2e) and reduce vehicle movements on urban roads and state highways. The sustainability and environmental performance of the Dynes fleet is detailed in Section 2 in the SOE of Mr Horan.
Regional supply chain resilience: The development could buffer seasonal export peaks that currently strain Port Chalmers' container storage capacity.	Transportation	Part B.09B – Economic Assessment - Part 2, Section 7.1	SLPL agrees that the SLIP will significantly increase container storage capacity and in so doing provide critical buffering for export container supply.
Economic and Regional Development Benefits - A \$200M development opportunity funded by the private sector, with direct positive impact on the region's economy. The project is presented as a critical piece of regional infrastructure – needed to keep lower South Island exports flowing and the southern economy healthy.	Economics	Part A.02 – Substantive Application Report, page 26	SLPL agrees that the SLIP will have a direct positive impact on the region's economy.
Infrastructure Catalyst Effects - Suggestions the development could trigger wider improvements, including for nearby infrastructure.	Economics	Part A.02 – Substantive Application Report, page 21, 30 Part B.12 - Integrated Transport Assessment, pages 44 – 47 Attachment 25 Plan SH87 right-turn Part C.01 - Proposed Conditions - Dunedin City Council	SLPL has agreed to fund the minor improvement works required at the SH 87 and Dukes Road North intersection, as detailed in the proposed new DCC Condition 75A and shown in Attachment 25. However, any wider improvements fall outside the scope of this application.



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Port Capacity and Supply Chain Benefits - The project addresses a lack of landside infrastructure. The consolidation would also free up industrial Dunedin land for development.	Economics	Part A.02 – Substantive Application Report, page 25	SLPL agrees that the SLIP will help to maximise the use and efficiency of port infrastructure and free up land within Dunedin City for other industrial development.
Private ownership - The site was privately acquired by Dynes Group and Port Otago, at no cost to the city, and the development leverages existing KiwiRail infrastructure, which alleviates the need for big capital expenditure from central or local government.	Economics	Part B.09 – Economic Assessment	SLPL agrees with this comment.
Impacts on Wāhi Tupuna (Cultural Landscape)			
A large-scale development such as the SLIP will diminish the experiential quality of the cultural landscape for those utilising the area around the proposed SLIP, including altering views from the site toward Mauka Atua.	Landscape	B.12 - Treaty Impact Assessment, pages 46 & 47 Attachment 11 SOE of Ms Gilbert, Section 6 Attachment 12 SOE of Mr Moore, Section 2	This is addressed in Section 6 in the SOE of Ms Gilbert and Section 2 in the SOE of Mr Moore.
Industrial transformation of the land which lies within landscape features shaped by Matamata physically alters places woven into the whakapapa of Manawhenua.	Landscape	Attachment 11 SOE of Ms Gilbert, Section 6 Attachment 12 SOE of Mr Moore, Section 2	This is addressed in Section 6 in the SOE of Ms Gilbert and Section 2 in the SOE of Mr Moore.



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Concern over assessments framed through the lens of natural character effects rather than cultural effects. Concern over the use of ecological metrics only and no cultural assessment, particularly in relation to discharges and outfall structures.	Landscape	Part-B.07 - Updated Landscape and Natural Character Assessment Part C.01 - Proposed Conditions – Dunedin City Council Part C.02 - Proposed Conditions – Otago Regional Council	The Landscape Assessment considers the cultural landscape of the site and area. DCC Conditions 10-16 and ORC Conditions 10-16 include the establishment of a Mana Whenua Consultation Group to provide an ongoing mechanism for mana whenua participation in the Project, including input into the development and implementation of management plans, monitoring programmes, and mitigation approaches.
Concern over the assessment of the landscape being based on “rural character” with cultural landscape values not assessed. Framing risks undervaluing the cultural significance of the landscape transformation.	Landscape	Attachment 11 SOE of Ms Gilbert, Section 6	This is addressed in Section 6 in the SOE of Ms Gilbert.
Concerns over the development diminishing the cultural significance of the viewshafts to and from Mauka Atua, with these not being adequately addressed in the landscape visual assessment.	Landscape	Attachment 11 SOE of Ms Gilbert, Section 6	This is addressed in Section 6 in the SOE of Ms Gilbert.
Concern that there remains a risk of disconnection between names and landscape.	Landscape	Attachment 11 SOE of Ms Gilbert, Section 6	This is addressed in Section 6 in the SOE of Ms Gilbert.



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Concern that proposed mitigations, are framed around ecological and amenity outcomes rather than considering cultural restoration with a lack of cultural monitoring and cultural interpretation.	Landscape	Part-B.07 - Updated Landscape and Natural Character Assessment, page 34 Part C.01 - Proposed Conditions – Dunedin City Council Part C.02 - Proposed Conditions – Otago Regional Council	The Landscape Assessment outlines a selection of natural character enhancement measures including targeted phased removal and control of weedy vegetation and establishment of locally appropriate indigenous vegetation. Consultation with Ōtākou influenced the choice of vegetation. DCC Conditions 10-16 and ORC Conditions 10-16 include the establishment of a Mana Whenua Consultation Group to provide an ongoing mechanism for mana whenua participation in the Project, including input into the development and implementation of management plans, monitoring programmes, and mitigation approaches.
Raised that ecological mitigation is not equivalent to cultural mitigation with regard to indigenous planting and weed removal, and that enhancement must be designed with Manawhenua.	Landscape Terrestrial Ecology	Part-B.07 - Updated Landscape and Natural Character Assessment, page 34 Part C.01 - Proposed Conditions – Dunedin City Council Part C.02 - Proposed Conditions – Otago Regional Council	The Landscape Assessment outlines a selection of natural character enhancement measures including targeted phased removal and control of weedy vegetation and establishment of locally appropriate indigenous vegetation. DCC Conditions 10-16 and ORC Conditions 10-16 include the establishment of a Mana Whenua Consultation Group to provide an ongoing mechanism for mana whenua participation in the Project, including input into the development and implementation of management plans, monitoring programmes, and mitigation approaches.



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Concern over the use of a Eucalyptus shelterbelt on eastern boundary as this affords no cultural value.	Landscape	Part B.07 – Updated Landscape and Natural Character Assessment, pages 16 and 28	Eucalyptus shelterbelt plantings are an established vegetation pattern along the eastern boundary and elsewhere throughout the local area. The proposed retention and infill planting of the eucalyptus shelterbelt, along with the native restoration of the adjacent true right bank of Whakaehu (Silver Stream) comprises an appropriate landscape response, as it balances the objectives of enhancing the native biodiversity, natural character and ‘health’ of the stream corridor alongside intentions to visually screen the development in views from the east in as short a timeframe as possible by using a proven shelterbelt species that form parts of the existing rural landscape.
Concern over potential impact of lighting on wildlife and that the landscape report natural character assessment could have acknowledged lighting effects on birds, kanakana or other taoka species.	Lighting	Part-B.08 - Assessment of Environmental Effects Lighting, section 5.1.6 and 5.2, page 15	An assessment on lighting disturbance is included in the Terrestrial Ecological Impact Assessment and summarised in the Assessment of Environmental Effects Lighting Report. The assessment concluded that with the implementation of mitigation measures outlined in Table 9 of the Terrestrial Ecological Impact Assessment, the Level of Effect is Low to Very Low for avifauna species.
Concern that no bird assessment was undertaken but it is proposed that this be a condition of consent.	Terrestrial Ecology	Part B.03 – Terrestrial Ecology Assessment, pages 47-50, 52, 55 Part C.01 - Proposed Conditions – Dunedin City Council	A Bird Monitoring and Mitigation Programme and Wildlife Hazard Management Plan (DCC Conditions 97 and 98) is proposed to manage impacts on birds.



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Concern with ensuring that the proposed lighting mitigations are implemented and that the lighting design needs to be further progressed in partnership with a lighting designer.	Lighting	Part A.02A - Southern Link Inland Port – Substantive Application Report, Section 2.25.2 Part B.08 – Lighting Assessment, pages 15 – 16 Part C.01 - Proposed Conditions – Dunedin City Council	A detailed lighting plan will be prepared for the site at detailed design, including yard and security flood lighting in accordance with WorkSafe guidelines, NZ Standard AS/NZS 1158.1.2, and industry (Port Equipment Manufacturing Association) standards for container yards. This will be issued to DCC prior to commencement of any operational activities. DCC Conditions 61-67 outlined the requirements for operational lighting.



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Impacts on Wai and Mauri			
Wastewater			
Concern over the condition and capacity of the Mosgiel wastewater treatment network and Mosgiel WWTP.	Civil Engineering	Part B.14 – Wastewater Assessment, pages 7, 9 – 10, and 20 Part C.01 - Proposed Conditions – Dunedin City Council Part C.02 - Proposed Conditions – Otago Regional Council Attachment 21 SOE of Mr Oakley, Section 2	DCC have confirmed that there is capacity in the wastewater network to accept the wastewater flow demand from the SLIP, subject to the following requirements: > The first section of the DCC wastewater gravity network on Odilins Place, an existing DN150 pipe (approx. 130m long), would need to be upgraded or the proposed rising main would need to be extended to discharge downstream of the DN150 pipe, into manhole FSM08601; > Limiting of trade waste flows in heavy rainfall events; and > Efforts to reduce wet weather flow from the development. The final detailed design will ensure the above requirements are met, in accordance with DCC Conditions 49-51 and ORC Conditions D.1-D.6. This is further detailed in Section 2 in the SOE of Mr Oakley.
Concern over the increase in wastewater which will in turn discharge via the Green Island WWTP outfall and via land on the Green Island landfill and that this will have a significant added impact on the receiving environment.	Civil Engineering	Part B.14 – Wastewater Assessment, pages 2, 9 & 10 Attachment 21 SOE of Mr Oakley, Section 2	DCC have confirmed that there is capacity in the wastewater network to accept the wastewater flow demand from the SLIP. The Wastewater Assessment concludes that the water design is in accordance with industry best practice and can be implemented without detriment to the surrounding environment. Details of the wastewater system will be refined during the detailed design phase.



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Concern over container bay wash containments entering the Mosgiel wastewater network.	Civil Engineering	Part B.14 – Wastewater Assessment, pages 14 & 19	The container washdown area will be connected to the DCC trade waste and will not enter the Mosgiel wastewater network.
Concern of wastewater pre-treatment solution and the need for using a UPT (universal pollutant trap).	Civil Engineering	Part B.14 – Wastewater Assessment, page 18	Wastewater sampling from the existing container washbay at the (Port Otago) Port Chalmers Site will be utilised to identify and quantify contaminants to confirm the design of the washbay pre-treatment is appropriate. This will be completed during the detailed design phase. The design of the pretreatment system will ultimately be matched to expected contaminants.
Incomplete description of sucker truck disposal of material from UPT ¹ . Clarity required around how and where the material from the UPT will be disposed.	Civil Engineering		The material will be required to be disposed of at an approved facility which can accept this material. The sucker truck contractors are well versed in proper disposal.
Concern over improper maintenance of wastewater and stormwater features having the potential for adverse environmental impacts.	Civil Engineering	Part C.02 - Proposed Conditions – Otago Regional Council	ORC Condition D.6 outlines that SLPL must ensure that the wastewater and stormwater management systems for the site are inspected, maintained and repaired as necessary to ensure that they are in good working order and continue to operate in a manner which minimises the potential for the discharge of trade wastes other than via the wastewater management system.

¹ Stantec New Zealand (18/12/2025). *Southern Link Inland Port - Wastewater Scheme*, pg 11



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Concern of the impact on taoka species and those using Whakaehu if wastewater overflow discharges to the stormwater ponds and then discharges into Silverstream. Potential contaminant impacts from the wash bay overflows.	Civil Engineering Stormwater Freshwater Ecology	Part B.14 – Wastewater Assessment, pages 17 & 19 Attachment 21 SOE of Mr Oakley, Section 2 Attachment 13 SOE of Ms Miller, Section 2	This is addressed in Section 2 in the SOE of Mr Oakley and Section 2 in the SOE of Ms Miller.
Potential for construction and connection to Mosgiel wastewater network to impact on Silver Stream.	Civil Engineering	Part B.13 – Stormwater Assessment, pages 37 – 38 Part D.01 – Draft construction management plan Part C.01 - Proposed Conditions – Dunedin City Council	In addition to the responses outlined above, a Construction Management Plan (CMP) will be formulated during the subsequent design stages in accordance with DCC Condition 21. The CMP will identify sensitive receptors and specify mitigation strategies to minimise or prevent impacts on the receiving environment. The application included a draft CMP. In addition, the CMP will be prepared in consultation with mana whenua, in accordance with DCC Condition 14.
Implications of many aspects of wastewater systems are linked to future design phases of project of which the implications for Ōtākou are not known. Ōtākou want to be aware of any major design changes during the phases of the project. If these changes are significant enough to change the operation of the system which in turn may have an impact on cultural values.	Civil Engineering	Part A.02 – Substantive Application Report, Section 7.2 Part C.01 - Proposed Conditions – Dunedin City Council	DCC Conditions 10-16 and ORC Conditions 10-16 include the establishment of a Mana Whenua Consultation Group to provide an avenue through which SLPL can provide updates on the including any design changes.



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Concerned that there was no mention in the draft report of potential mitigations if odour / septicity becomes an issue.	Civil Engineering	Part B.14 – Wastewater Assessment, page 22	The Wastewater Assessment considers that the risk of odour and septicity is acceptably low. The early connections to the wastewater system will be those closest to the pump station, reducing the risk of long residence time within the network. In the unlikely event of odour issues, subsequent mitigation could include more regular flushing of the system, or in extreme cases, the fitting of odour filters to manholes. The system is designed as a gravity system, which means that pipes aren't full. This means that the wastewater flow is aerated, which mitigates the risk of septicity.



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Stormwater			
Concerns regarding stormwater outlet design and erosion control. Implications of many aspects of stormwater systems are linked to future design phases of project of which the implications for Ōtākou are not known.	Stormwater	Part A.02 – Substantive Application Report, Section 7.2 Part C.01 – Proposed Conditions Dunedin City Council Part C.02 – Proposed Conditions Otago Regional Council	Deferring certain aspects of the final design to the detailed design phase is a standard and widely accepted practice in resource management. The relevant consent conditions and approved documentation provide the framework and requirements that guide how the detailed design is developed and implemented. The proposed Mana Whenua Consultation Group (DCC Conditions 10-16 and ORC Conditions 10-16) provide an appropriate mechanism for SLPL to keep mana whenua informed as detailed design progresses, including through consultation meetings required under the condition. This enables mana whenua to remain involved in the Project's development and implementation and to provide feedback on matters relevant to their interests and values.
Concern over the adequacy of monitoring of Whakaehu downstream and upstream of inland port.	Freshwater Ecology	Attachment 13 SOE of Ms Miller, Section 4	This is addressed in Section 4 in the SOE of Ms Miller.
Lack of clarity on stormwater attenuation pond outlet and land treatment.	Stormwater	Part B.13 – Stormwater Assessment, pages 21 & 25, 27 & 31, 39	Additional clarification provided in the Stormwater Assessment has confirmed that a stormwater attenuation pond outlet structure is proposed, with treatment of water to occur via measures such as catchpits, GPTs, and the stormwater attenuation pond.
Concerns over erosion controls for Silver Stream with regard to the protection of water quality for taoka species and habitat.	Freshwater Ecology	Part B.13 – Stormwater Assessment, pages 37 & 38	Appendix D in the Stormwater Assessment contains design drawings that outline the current arrangement and design of the erosion mitigations for the two outlets. Scour counter



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	Stormwater		measures will be designed to current NZ good practice to minimise long term erosion from the SLIP pond discharge. This will include the sizing of riprap channel/flume lining and to design in response to site geotechnical investigations results on the stream bank. These matters will also be addressed in the Erosion and Sediment Control Plan (DCC Condition 21).
Impacts on Silver Stream from spills, and containments if there is not treatment (filters, basin).	Freshwater Ecology	Part A.02A - Southern Link Inland Port - Substantive Application, page 19 Part B.04 – Freshwater Ecological Impact Assessment, pages iv, v, 36, 39 & 42 Part B.13 – Stormwater Assessment, page 38 Part C.01 – Proposed Conditions – Dunedin City Council Part C.02 – Proposed Conditions – Otago Regional Council	A Spill Response Plan must be developed for the Project, in accordance with the DCC Condition 47 and OCR Condition 26-27. This plan will specify suitable management measures to avoid, remedy, mitigate, and / or minimise risks from contaminant spills during construction to Silver Stream. Future design phases will also include consideration of supplementary mitigation strategies at the pond outlets prior to discharging into Silver Stream. For example, in the event of a significant spill, the pipelines or attenuation pond and control manhole/outlet structure could be adapted to provide an isolation facility so that vacuum trucks may extract spill materials and contaminated water before it leaves the site.



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Water Supply			
The application does not address contamination pathways or cumulative groundwater effects. The pre-existing contamination must be understood as part of the cumulative effects on groundwater resources.	Hydrogeology	Part B.05 – Detailed Site Investigation, page 5, 36-38 Part B.11 – Groundwater Assessment, page iii, 9, 18 – 19 Part D.02 – Draft Contaminated Site Management Plan Part C.01 – Proposed Conditions – Dunedin City Council	The Detailed Site Investigation considers groundwater and identifies pathways for human exposure to contaminants including groundwater and concludes that the as a reticulated water supply is available at Dukes Road North, the consumption of potentially contaminated groundwater at the site is unlikely. The Groundwater Assessment provides an assessment of the groundwater impacts including impacts to groundwater levels and flow patterns, groundwater quality, impacts from the stormwater basin, surface water deletion and effects on current and future groundwater users and concludes that the expected impacts on the hydrogeological system as a result of the SLIP are negligible. OCR Conditions 28-32 require groundwater monitoring to continue to ensure that the baseline and any changes to this and understood and managed. The Groundwater Assessment also provides a summary of the groundwater quality results, as reported in the North Taieri closed landfill 2024 Annual Monitoring Report (Dunedin City Council, 2024). This data provides a useful set of baseline groundwater quality data, which can be used to compare with groundwater quality during and after construction to determine any changes. The data also suggests that any groundwater quality impacts from the nearby landfill site are not likely to be an issue at the Site.



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			Contamination will be managed in accordance with the Contaminated Site Management Plan and Remedial Action Plan (DCC Conditions 31-34).
Any future groundwater abstraction would require separate cultural assessment, as direct takes from groundwater engage Kāi Tahu interests differently from municipal supply connections.	Hydrogeology	Part B.11 – Groundwater Assessment, page iii, 21	SLPL had included groundwater abstraction as an optional future aspect of the project. This is no longer proposed.
Concern about, and lack of assessment of water abstraction from stressed regional water resources in the Taiari catchment.	Hydrogeology	Part B.11 – Groundwater Assessment, page iii, 21	SLPL had included groundwater abstraction as an optional future aspect of the project. This is no longer proposed.
Concerns on the contamination risk to waterways in a fire event where fire suppression water is mixed with industrial materials.	Hydrogeology	Part D.02 – Draft Contaminated Site Management Plan Part C.01 – Proposed Conditions – Dunedin City Council	This event is anticipated to be very rare however, mitigation measures in place for contamination prevention of Silver Stream as outlined in the Contaminated Site Management Plan (DCC Conditions 31-32) will be adhered to.
The mitigation focuses entirely on reducing harm rather than protecting or restoring the health of Whakaehu. No mechanism exists for Manawhenua to assess the state of Whakaehu.	Landscape	Part B.07 – Updated Landscape and Natural Character Assessment, page 17	The Landscape Assessment outlines a selection of natural character enhancement measures be implemented for the section of Whakaehu within the site including targeted phased removal and control of weedy vegetation and establishment of locally appropriate indigenous vegetation. These enhancements would also have associated positive visual effects which would be experienced by users of the public walking track located on the southern side of Whakaehu.



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Impacts on Mahika Kai			
Concern over not capturing the holistic health of a waterway with the ecological assessment proceeding on the implicit assumption that industrial development may discharge to waterways provided effects are "mitigated" to an acceptable level. This may conflict with cultural perspectives.	Freshwater Ecology	Part B.13 – Stormwater Assessment, pages 8 & 9, 32, 38 Part B.04 – Freshwater Ecology Assessment, pages 34 & 35, 39, 4. Attachment 13 SOE of Ms Miller, Section 4	This is addressed in Section 4 of the SOE of Ms Miller.
Areas of potential contamination are identified, but limited assessment of potential associated risks to Silver Stream is provided.	Stormwater	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.11 Part B.13 – Stormwater Assessment, pages 37 & 38 Part B.04 - Freshwater Ecology Assessment, pages 35 & 36 Part C.01 – Proposed Conditions – Dunedin City Council	The proposed effects management approach is to reduce all actual and potential effects on the Silver Stream, which is demonstrated by the application design, proposed conditions and mitigation approaches. The Stormwater Assessment concluded that site remediation works will occur prior to the commencement of any stormwater related activities, therefore there will be no direct risks of contamination to the Silver Stream. DCC Conditions 33-34 require a Remedial Action Plan.
Concerns that the proposed monitoring of Silver Stream is inadequate and should run for longer. Further provision is also recommended for mana	Freshwater Ecology	Part B.04 – Freshwater Ecology Assessment, pages 10 & 11, 14, 18 &	This is addressed in Section 4 of the SOE of Ms Miller.



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whenua involvement in assessing waterway health and for applying cultural health indices alongside Western scientific measures.		19, 37, 39 & 40, and 42 – 43 Part C.01 – Proposed Conditions Dunedin City Council Part C.02 – Proposed Conditions Otago Regional Council Attachment 13 SOE of Ms Miller, Section 4	DCC Conditions 10-16 and ORC Conditions 10-16 include the establishment of a Mana Whenua Consultation Group to provide an avenue through which SLPL will consult with mana whenua.
Concern that the development will maintain a fish population, but they will no longer be suitable for consumption. No assessment of mahika kai values or impacts on customary food gathering provided. No offset or enhancement of mahika kai opportunities elsewhere in the catchment. No assessment of mahika kai values or cultural harvest indicators.	Freshwater Ecology	Attachment 13 SOE of Ms Miller, Section 4	This is addressed in Section 4 of the SOE of Ms Miller.
Concern that as Whakaehu is already "highly modified", adding industrial pressure to an already stressed system compounds existing degradation.	Freshwater Ecology	Attachment 13 SOE of Ms Miller, Section 4	This is addressed in Section 4 of the SOE of Ms Miller.
Concern over the management of HAIL sites and limited assessment of potential associated risks to Silver Stream during construction.		Part B.05 – Detailed Site Investigation	The management of contaminated /hazardous activities during construction is comprehensively addressed through the DCC Conditions 30-37 and ORC Conditions A.1-A.4 which require a Contaminated Site Management Plan to be prepared. A Draft



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		Part C.01 – Proposed Conditions Dunedin City Council	Contaminated Site Management Plan has also been prepared as part of the application.
		Part C.02 – Proposed Conditions Otago Regional Council	
		Part D.02 - Draft Contaminated Site Management Plan	



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Treaty Settlement Obligations: This TIA identifies that Treaty of Waitangi (Fisheries Claims) Settlement Act 1992 obligations are engaged. The mitigation package does not demonstrate how these obligations are being met.	Freshwater Ecology	Legal Submissions, Section 4 Part C.01 – Proposed Conditions Dunedin City Council Part C.02 – Proposed Conditions Otago Regional Council Attachment 13 SOE of Ms Miller, section 4	This is addressed in Section 4 of the SOE of Ms Miller and in Legal Submissions. Neither the Fisheries Settlement Act nor the Fisheries Act impose any obligations on SLPL and in our submission do not affect the Panel's assessment of this application. However, DCC Conditions 10-16 and ORC Conditions 10-16 include the establishment of a Mana Whenua Consultation Group to enable mana whenua involvement in the development and implementation of management plans, monitoring programmes, and mitigation measures throughout the Project. This recognises that ecological specialists are not best placed to determine the cultural significance of effects or appropriate cultural responses. Accordingly, the proposed framework enables mana whenua to identify and help design culturally appropriate measures where required, including in relation to taoka species and customary fisheries values. SLPL considers this collaborative approach is a more appropriate way to address cultural interests and Treaty settlement considerations than predetermining mitigation measures without direct mana whenua input.
Impacts on Taoka Species			
The Freshwater Ecological Report does not assess impacts on taoka bird species or taoka plant species in any substantive way. However, with respect to plants, this must be considered in the context of the	Terrestrial Ecology Freshwater Ecology	Part B.03 – Terrestrial Ecology Assessment, pages 9 -15, 26-37, 42-43, 52, 55	An assessment of bird and plant species was included in the Terrestrial Ecology Impact Assessment. The Terrestrial Ecology Impact Assessment outlines the vegetation communities at the site including confirming that



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site being a rural site with vegetation typical of a farmed landscape.			the majority of the site is grazed pasture and the vegetation that requires clearing is exotic vegetation.
The Ecological Report identifies the fish species present in Whakaehu, all of which are taoka species listed in the NTCSA 1998 or part of customary fisheries recognised in the Sealord settlement. However, their treatment in the assessment is limited from a cultural perspective.	Freshwater Ecology	Legal Submissions, Section 4 Part B.04 - Freshwater Ecology Impact Assessment, pages ii - iii, 25 – 30 Part C.01 – Proposed Conditions Dunedin City Council Part C.02 – Proposed Conditions Otago Regional Council Attachment 15 SOE Of Dr Allibone, Section 2	No fish species that are taoka species listed in the NTCSA 1998 have been identified in the Whakaehu. The only taoka species listed in the NTCSA that the Ecological Report says might potentially be present in the Whakaehu is the giant kōkōpu, The SOE of Dr Allibone provides further information on his experience of giant kōkōpu spawning in the area. The NTCSA is addressed in Legal Submissions. Regardless, SLPL considers that the identification of cultural values and appropriate cultural mitigation measures is best informed by mana whenua. DCC Conditions 10-16 and ORC Conditions 10-16 include the establishment of a Mana Whenua Consultation Group to enable mana whenua involvement in the development and implementation of management plans, monitoring programmes, and mitigation measures throughout the Project. This recognises that ecological specialists are not best placed to determine the cultural significance of effects or appropriate cultural responses. Accordingly, the proposed framework enables mana whenua to identify and help design culturally appropriate measures where required, including in relation to taoka species and customary fisheries values. SLPL considers this collaborative approach is a more appropriate way to address cultural interests and Treaty settlement considerations than



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			predetermining mitigation measures without direct mana whenua input.
The riparian planting is modest relative to the 40ha development footprint. No net gain principle is articulated.	Terrestrial Ecology Landscape	Part A.02A - Southern Link Inland Port - Substantive Application Part B.07 – Updated Landscape and Natural Character Assessment, page 16-17 Part B.03 – Terrestrial Ecology Assessment, pages 48-49, 52-53, 56 Part C.01 – Proposed Conditions Dunedin City Council	Planting of selected eucalyptus specimen trees and locally appropriate indigenous species will be undertaken to fill gaps within the existing tree canopy along the Silver Stream bank. Pest and weedy species will be removed with controlled implemented to reduced rest of return. DCC Condition 68 outlines that the landscaping and planting works must be completed in general accordance with the Landscape Management Plan (attached to the DCC condition set). DCC Condition 90 outlines that if the riparian vegetation monitoring required by DCC Condition 88 determines that there has been a change in the behaviour or use of riparian vegetation along the stream edge and bank of Silver Stream by Threatened and At Risk avifauna species as a result of the Project compared to the pre-construction baseline monitoring required by DCC Condition 96, restoration planting along a length of stream proportional to the level of effect determined from the monitoring must be undertaken.
Impacts Nohoaka – Camping Sites			
While the proposed development site is not itself a nohoaka location, the development has potential to affect the broader system of seasonal occupation and resource gathering that nohoaka represent:	Freshwater Ecology	Legal Submissions, Section 4 Part B.04 – Freshwater Ecology Assessment,	The nohoaka sites identified are not recognised in the NTCSA. Schedule 96 of the NTCSA confirms that no nohoaka entitlements are granted over or close to the SLIP site, therefore, the mechanisms in the NTCSA are not engaged.



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> Degradation of water quality may affect downstream camping sites; > Reduced mahika kai availability may diminish the purpose and viability of seasonal camping; and > Industrial activity adjacent to Whakaehu may affect the experience of whānau using walking trails and recreation areas.		pages 10 – 11, 14, 18 – 19, 37, 39 – 40, and 42 – 43 Part B.07 – Updated Landscape and Natural Character Assessment, page 17 Part C.01 - Proposed Conditions Dunedin City Council Part C.02 – Proposed Conditions Otago Regional Council	The Freshwater Ecology Assessment concludes that, with the proposed stormwater treatment, management measures, and monitoring framework in place, significant adverse effects on water quality and aquatic ecology are low. Baseline monitoring, site-specific trigger levels, and an adaptive management regime are proposed to ensure that any unexpected effects are identified and appropriately managed. As detailed above, SLPL considers that mana whenua are best placed to determine the extent to which potential changes to environmental conditions may affect nohoaka values, mahika kai practices, or the experience of whānau using the wider Whakaehu environment. For this reason, a Mana Whenua Consultation Group (DCC Conditions 10-16 and ORC Conditions 10-16), which provides a mechanism for mana whenua to participate in the development and implementation of management plans, monitoring programmes, mitigation measures, and cultural protocols throughout the Project.
Impacts on Ara Trails			
The proposed development may affect contemporary walkways along Whakaehu which maintain a fundamental relationship between people and a landscape established by traditional ara. Effects may comprise: > Temporary loss of access; > Degraded experience due to visual, noise, and air quality impacts; and	Landscape	Part B.07 – Updated Landscape and Natural Character Assessment, page 17, 19 Attachment 11 SOE of Ms Gilbert, Section 6	The Landscape Report assesses the impacts on the walkways along the Whakeaehu. The walkway and old Māori will not be physically impacted by the SLIP. Although glimpsed views of the SLIP through the streamside vegetation will occur, additional planting along the stream will be undertaken to enhance the natural qualities of the stream.



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> Opportunities for enhanced connectivity if new walking/cycling infrastructure is provided. > The "old Māori Track" running alongside Whakaehu (described in section 3.8) is acknowledged as having wāhi tūpuna value for the Taiari River — but the reach of the track alongside Whakaehu is not addressed or assessed for impact.			There will be no loss of access to the walkways during construction or operation. Providing additional walking/cycling infrastructure is outside of the scope of this application.

Impacts on Cultural Values

Whakapapa: The development has the potential to disrupt the connections between whānau and places that have been maintained across generations. The SLIP, and ongoing effects on Whakaehu, may diminish the capacity of the landscape to sustain the intergenerational transfer of mātauraka and the place-based experiences that define identity.

SLPL acknowledges the cultural association with the site and surrounding landscape identified by mana whenua. SLPL note that these values have been taken into account in the development of the Project and proposed management measures, including the proposed provision for cultural health monitoring in the proposed consent conditions, kanakana/lamprey surveys in Whakaehu and the Mana Whenua Consultation Group, who will have the opportunity to review and comment on a number of the management plans that will be prepared for the Project.

Rakatirataka: Concerns for the future exercise of rakatirataka by Ngāi Tahu across several interconnected dimensions.

The SLIP would fundamentally alter the character of the Taiari Plain, limiting Ngāi Tahu's capacity to exercise rakatirataka over future land use decisions.

See above. SLPL also notes that it has meaningfully engaged with mana whenua throughout the development of the application, as well as following lodgement of the application. SLPL has invited opportunities for mana whenua involvement, including with respect to the drafting of the proposed consent conditions. SLPL is committed to continuing this engagement throughout the implementation of the consent.



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Once industrial infrastructure of this scale is established, it creates path dependencies that constrain subsequent choices. The Taiari catchment's waterways support mahika kai practices central to cultural identity and customary rights. The proposed activities could compromise water quality, habitat connectivity, and mahika kai values. Climate projections indicate the Taiari Plain faces increasing flood risk and groundwater challenges. Locking in major infrastructure reduces the adaptive capacity available to Kāi Tahu for responding to environmental change on their terms. How this proposal proceeds will signal whether Treaty partnership / co-governance genuinely shapes significant development decisions or merely provides a consultation checkbox. A process that proceeds without substantive Kāi Tahu consent weakens the precedent for meaningful co-governance across other domains where rakatirataka should apply.			
Kaitiakitaka is an inherited obligation to maintain the mauri of te taiao. The SLIP places additional stress on a system already showing signs of degradation. The fulfilment of kaitiakitaka obligations requires that Manawhenua have an ongoing role in monitoring, adaptive management, and decision-making		Part C.01 – Proposed Conditions Dunedin City Council Part C.02 - Proposed Conditions – Otago Regional Council	DCC Conditions 10-16 and ORC Conditions 10-16 outline the requirements of the SLIP to establish a Mana Whenua Consultation Group within three months of consent commencing. The group will facilitate ongoing engagement and information sharing between mana whenua and SLPL, provide input into management plans and mitigation measures, support the implementation of tikanga and kawa during



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throughout the life of the development. The SLIP could create substantial constraints on future spatial planning across the Taiari Plain, establishing infrastructure and land use patterns that would shape development trajectories for generations. The CMP makes no provision for a Manawhenua representative, cultural advisor, or kaitiaki monitor. The fortnightly project meetings invite SLPL, contractors, sub-contractors, and environmental SQEPs — but not mana whenua.			construction, and be kept informed of any archaeological discoveries of Māori origin in accordance with the accidental discovery protocol.
The mana of Manawhenua is reflected in the health of their taiao. Development activities that degrade water quality, diminish taoka species populations, or compromise mahika kai cause environmental harm that, in turn, diminishes the mana of both the landscape and Manawhenua whose identity and standing are interwoven with it.	Freshwater Ecology	Part B.04 – Freshwater Ecology Assessment, pages 10 &11, 14, 18 & 19, 37, 39 & 40, and 42 & 43 Part C.01 – Proposed Conditions Dunedin City Council Part C.02 - Proposed Conditions Otago Regional Council	SLPL acknowledges the view that the health of the taiao is closely connected to the mana of mana whenua. As described above, DCC Conditions 10-16 and ORC Conditions 10-16 include the establishment of a Mana Whenua Consultation Group to provide an ongoing mechanism for mana whenua participation in the Project, including input into the development and implementation of management plans, monitoring programmes, and mitigation approaches.
Manaakitaka depends upon healthy waterways, accessible mahika kai, and a cultural landscape that reflects the kaitiakitanga of Kāi Tahu. The proposed development has the potential to affect each of these foundations. The capacity of Manawhenua to fulfil obligations of care and hospitality toward whānau,	Freshwater Ecology	Part B.04 – Freshwater Ecology Assessment, pages 10 &11, 14, 18 & 19, 37, 39 & 40, and 42 & 43	Refer to response above.



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communities and visitors may be compromised if the environmental foundations of manaakitaka are degraded.		Part C.01 – Proposed Conditions Dunedin City Council Part C.02 - Proposed Conditions Otago Regional Council	
The health and wellbeing of Kāi Tahu whānau is directly connected to the health of waterways, land, and ecosystems (whānau ora). Beyond the environmental effects discussed above, the operation of an inland port introduces potential impacts on air quality (diesel emissions, dust), noise, traffic, and amenity that may affect the wellbeing of whānau, particularly tamariki and kaumātua.	Freshwater Ecology	Part C.01 – Proposed Conditions Dunedin City Council Part C.02 - Proposed Conditions Otago Regional Council	The potential effects of the Project on air quality, noise, traffic, and amenity have been assessed by the relevant technical specialists and are addressed through the proposed design, management measures, and consent conditions. The assessments conclude that, with these measures in place, adverse effects are expected to be appropriately avoided, remedied, or mitigated. SLPL acknowledges the importance of whānau ora and the connection between the health and wellbeing of Kāi Tahu whānau and the health of waterways, land, and ecosystems. However, the identification of specific cultural wellbeing effects, and the development of culturally appropriate responses to those effects, is a matter best informed by mana whenua through the Mana Whenua Consultation Group, as described above.



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Noise from trains at night would exceed guidelines at brief periods.	Noise	Part A.02A – Southern Link Inland Port – Substantive Application Report, Section 2.27 Part B.06 – Noise Assessment, Section 10.4 Attachment 19 SOE of Mr Shanks, Section 3 Part C.01 - Proposed Conditions – Dunedin City Council	Notably, the rail corridor is designated and used by operators other than SLPL. As such, SLPL does not have control over noise levels associated with rail movements that have no relationship to SLIP operations. Any noise from trains at night-time outside of the rail corridor is addressed in Section 3 in the SOE of Mr Shanks and DCC Condition 59A has been proposed in response to this evidence.
Removal of acoustic bund at Stage 3 may expose receivers to increased noise as operations expand.	Noise	Part A.02A - Southern Link Inland Port – Substantive Application, Section 2.19	The noise bund in place for Stages 1 and 2 is to be removed and replaced with a noise barrier of equal height in Stage 3.
Concern that future residential developments in the area surrounding the railway line could be impacted from the proposed rail movements.		-	Cumulative effects from future intensive development of the surrounding area would need to be addressed by future development applications. SLPL cannot predict the effects of future development that is not currently known.



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Increase in heavy vehicle movements on Gordon Road and Dukes Road North. The concern is that the existing level of trucks on roads through Mosgiel may not be acceptable to whānau – making the "only 1% more" framing culturally inadequate. The ITA still frames the impact purely in proportional traffic engineering terms.	Transportation	Part A.02A - Southern Link Inland Port – Substantive Application, Sections 9.3.9 & 6.14.2 Part B.12 - Integrated Transport Assessment, Sections 8 & 9.2.2 Attachment 10 SOE of Mr Rossiter, Section 5	This is addressed in Section 5 in the SOE of Mr Rossiter. The ITA has addressed traffic effects associated with the SLIP, including the existing state highway network. The ITA Addendum, submitted in response to Minute 4 from the Panel, further considers future growth in traffic volumes and notes that there have been only low levels of growth in traffic in Mosgiel in recent years. The SLIP is expected to contribute only about 1% growth to SH87 traffic volumes north of SH1 compared to 2025 volumes.
Road safety impacts from increase in heavy truck movements along Gordon Road. Traffic assessment does not engage with the cultural dimension. Concerns how increased HCV exposure affects the sense of safety and wellbeing for whānau using the main street of their township, including tamariki and kaumātua.	Transportation	Attachment 10 SOE of Mr Rossiter, Section 5	This is addressed in Section 5 in the SOE of Mr Rossiter.
Road safety issues on Stedman Rd and Wingatui Road - Increase in use of roads from SLIP staff. Concern regarding impacts on existing community use of these roads including the Whakaehu walking track access off Wingatui Road, the parking area near the Stedman Road railway bridge, and the informal path under the rail line.	Transportation	Attachment 10 SOE of Mr Rossiter, Section 5	This is addressed in Section 5 in the SOE of Mr Rossiter.

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The need for an LCSIA (Level Crossing Safety Impact Assessment) in consultation with KiwiRail has not been explicitly resolved. The updated ITA frames this as "understood" rather than confirmed through a formal assessment. Otakou also noted the potential for long-term increase to four rail movements per day; the updated ITA only discusses two.	Transportation	Part B.12 - Integrated Transport Assessment, Sections 7.4 & 8.6 Attachment 10 SOE of Mr Rossiter, Section 5	This is addressed in Section 5 in the SOE of Mr Rossiter. A Level Crossing Safety Impact Assessment is required at the discretion of KiwiRail. The ITA discusses the number of train movements proposed with the SLIP. It is noted the facilitating of more freight movement by rail is a long-term goal of SLPL, however, this is not proposed as part of this application and those effects will be assessed as and when it becomes necessary.
Cumulative Effects			
From a cumulative effects perspective, the proposed development represents another step in the transformation of the Lower Taiari from a cultural landscape sustaining Manawhenua to an increasingly modified environment where cultural practices are progressively constrained.	Landscape	Attachment 11 SOE of Ms Gilbert, Section 5	This is addressed in Section 5 in the SOE of Ms Gilbert. It is SLPL's view that the burden of some of these matters cannot be expected to fall on the shoulders of SLPL. Considerations of these needs to occur at the district and regional level.
Restricting Future Adaptation Due to "locking-in" Infrastructure			
Concern that once a nationally significant freight hub is operational, the political and economic decisions around flood protection could shift dramatically. Adding a major inland port to the list of protected assets creates even stronger imperatives to defend the existing flood scheme rather than consider alternatives.	Stormwater Natural Hazards		It is SLPL's view that the burden of some of these matters cannot be expected to fall on the shoulders of SLPL. Considerations of these needs to occur at the district and regional level.



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Whakaehu is a significant tributary of the Lower Taiari River which has been modified by engineering works to provide flood protection to the lower Taiari. The Southern Link development would likely require additional drainage infrastructure - culverts, pumps, stormwater detention - designed around current conditions and near-term projections.	Stormwater	Part B.13 – Stormwater Assessment, pages 8, 15, 19 - 20 & 25 - 31	The Stormwater Assessment provided with the application considers the effects on the Taieri flood protection scheme through the modelling of both short and critical duration rainfall events. The modelling indicates that the proposed stormwater management system can be designed to avoid increasing downstream flood risk, with peak water levels during the critical 1% AEP climate change event predicted to be marginally lower than baseline conditions. The assessment concludes that the Project is not expected to result in adverse effects on downstream flood protection infrastructure or flood levels within Mosgiel, and this performance will be confirmed and refined through detailed design.
Concern that Mosgiel's main street becomes even more embedded as a freight corridor. The Mosgiel-Taiari Community Board offered conditional support on the basis that the heavy traffic bypass for Mosgiel was dealt with at the same time, but NZ Transport Agency Waka Kotahi has already signalled it does not support funding a heavy traffic bypass.	Transportation		SLPL acknowledges the existing traffic and roading constraints on the surrounding transport network. Whilst these issues are recognised, they are existing conditions and are not a consequence of, or caused by, the proposed SLIP. Addressing broader network-wide roading and traffic issues falls outside the scope of this application, and it would not be appropriate to attribute responsibility for resolving these pre-existing matters to SLPL through this project.
There are large tracts of flat industrial land available close to the location for the SLIP, and it can be expected that several other significant players will also relocate to the area once the SLIP is established. There is concern this will create Land Use Zoning Rigidity.	Land	Attachment 17 SOE of Mr Driver, Section 2	This is addressed in Section 2 of the SOE of Mr Driver.



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A major industrial development can distort local property markets in ways that complicate household-level adaptation. If the inland port succeeds, nearby residential areas may see property values rise due to employment proximity—even if flood risk is simultaneously increasing. This creates perverse incentives.	Planning		It is SLPL’s view that the burden of some of these matters cannot be expected to fall on the shoulders of SLPL. Considerations of these needs to occur at the district and regional level.
Large-scale industrial development typically involves significant impervious surfaces that alter groundwater recharge patterns. This could constrain adaptation options that depend on maintaining aquifer health – such as drought resilience or managing soil moisture during increasingly variable rainfall.	Hydrogeology	Part B.11 – Groundwater Assessment, page 20	It is SLPL’s view that the burden of some of these matters cannot be expected to fall on the shoulders of SLPL. Considerations of these needs to occur at the district and regional level.
The loan from the Regional Infrastructure Fund to SLPL and KiwiRail would allow a three-track rail-siding to be built, connecting Port Chalmers to the SLIP. Rail infrastructure is inflexible and cannot be easily moved, with the corridor it occupies becoming effectively permanent. Expanding rail infrastructure in flood-prone areas creates, linear barriers to flood flow that may exacerbate ponding, corridors that must be defended at all costs (regardless of broader adaptation logic), and fixed assets that constrain future realignment of flood defences.	Transportation Stormwater Natural Hazards		The national and regional rail infrastructure already exists in this location. The flood risk already exists for this infrastructure. The proposed stormwater management system will improve the flood risk adjacent to the SLIP site.



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Concern that the constraints on adaptation will not fall evenly across the community. Those with fewer resources to adapt independently may find their options most constrained. > Renters in areas subject to increased flood risk or traffic impacts; > Lower-income homeowners unable to afford flood-proofing or relocation; > Elderly residents with limited mobility or capacity to advocate for their interests; and > Manawhenua whose relationship with the Taiari awa may be affected by decisions made to protect industrial assets.	Natural Hazards	Part B.13 – Stormwater Assessment, pages 11, 15, 39 - 40	The Stormwater Assessment submitted with the application demonstrate that the Project will not increase flood risk within the Mosgiel community and is not expected to adversely affect the operation of the Taieri flood protection scheme.

