

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

Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Craig and Joanne Inch			
Consultation was not undertaken until after application was lodged, despite commenter seeking response when application was announced. <i>p. 1</i>		Part A.02A - Southern Link Inland Port - Substantive Application, Section 5.3.5	SLPL waited to undertake consultation with neighbours to ensure that it had undertaken the detailed effects assessments to inform consultation and guide discussions and responses to questions from the community as to how certain effects will be addressed. Since lodging the application, SLPL has actively engaged with adjacent landowners, which included individual meetings with adjacent landowners and holding a community consultation session on 7 July, where SLPL's technical experts and project team were present to talk to adjacent landowners about the project and answer any questions.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concern regarding what the noise barrier will be constructed of and the height of the barrier as compared to the height of stacked containers. Questions whether the noise associated with that of containers being stacked above the barriers has been considered. <i>p.2, Section: Noise</i>	Noise	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.15 Part B.06 - Noise Assessment Attachment 19 SOE of Mr Shanks, Section 3	This is addressed in Section 3 in the SOE of Mr Shanks. The construction material is irrelevant provided the barrier is constructed in accordance with the design standards set out in the application, i.e. an appropriate surface mass and without any gaps. Noise has been assessed taking into account the height of the stacked containers being greater than the height of the barrier.
Concern regarding noise related to the container storage area located close to their residence (at 54 Ruthford Street). <i>p.2, Section: Noise</i>	Noise	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.15 Part B.06 - Noise Assessment Attachment 19 SOE of Mr Shanks, Section 3 Part C.01 - Proposed Conditions – Dunedin City Council	This is addressed in Section 3 in the SOE of Mr Shanks. Whilst proposed mitigation measures will not completely avoid any noise from being generated from the site, they will appropriately minimise the noise that is generated. These mitigation measures will be implemented in accordance with DCC Condition 60, which sets out the Operational Noise Management Plan, and DCC Condition 60A, which provides specifics for the construction of acoustic barriers. Operational noise will not exceed the limits set out in proposed DCC Condition 58.

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Concern regarding night-time train movements, seeking confirmation of train operating hours. <i>p.2, Section: Noise</i>	Noise	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.15 Part B.06 - Noise Assessment¹ Attachment 19 SOE of Mr Shanks, Section 3 Part C.01 - Proposed Conditions - Dunedin City Council	This is addressed in Section 3 in the SOE of Mr Shanks. The assessment of train noise was updated on 22 July 2026 to address concerns of this nature. The number of proposed train movements during the night-time period has been limited 4 per night-time period (i.e. two trains arriving and departing the Site), between 10:00pm and 7:00am. It is predicted that rail activity on site can comply with the night-time limits. This is captured in DCC Condition 59A.

¹ The Noise Assessment, now referenced as Part B.06 – Noise Assessment, was updated in July 2026 in response to directions from the Panel



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Concern regarding noise resulting from truck movements along the Silverstream boundary. <i>p.2, Section: Noise</i>	Noise	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.15 Part B.06 - Noise Assessment Attachment 19 SOE of Mr Shanks, Section 3 Part C.01 - Proposed Conditions – Dunedin City Council	This is addressed in Section 3 in the SOE of Mr Shanks. The assessment predicts that truck movements to Exchange 2 area (closest to the Silverstream boundary) are adequately mitigated by the site barrier. No truck movements are proposed along this route during the night-time period.
Concern that the proposed noise levels will impact on quality of life. <i>p.2, Section: Noise</i>	Noise	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.15 Part B.06 - Noise Assessment Attachment 19 SOE of Mr Shanks, Section 3	This is addressed in Section 3 in the SOE of Mr Shanks. The assessment sets out that predicted daytime noise levels comfortably comply with the daytime noise limits in the district plan by more than 5 decibels. The predicted levels are below the existing daytime noise levels in the area. Assessments were completed at the notational boundary of this property, and it is considered that this site does not require any special consideration over other nearby receivers.



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Concern regarding stormwater/ run off overflow of pond (in the southeast corner) spilling into Silver Stream and the effects on homes/ future developments in Mosgiel of such an event. <i>p.2, Section: Floodwater</i>	Natural Hazards	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.11 B.13 - Stormwater Assessment, pages 15 & 39 Attachment 6 SOE of Mr Craig, Section 6.	This is addressed in Section 6 in the SOE of Mr Craig.
Concern regarding contaminated spillage entering Silver Stream / aquafill as their household water is supplied by bore <i>p.2, Section: Floodwater</i>	Natural Hazards	Part A.02A - Southern Link Inland Port - Substantive Application, Sections 2.20 & 6.11 Part C.01 - Proposed Conditions - Dunedin City Council	There are measures in place to avoid any spills occurring on the site, however, in the circumstance where a spill occurs, the response will follow the procedures set out in the Spill Response Plan as outlined in DCC Conditions 47 and 48.
Concern that logging operations would be conducted on site (run off from logs is a concern) <i>p.2, Section: Floodwater</i>	Freshwater Ecology		No logging operations or processing of logs are proposed as part of the SLIP Project. If this were to change in the future, then any consent related ramifications of that change would need to be addressed at that time.



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Concern regarding reflecting light depending on the surfacing on the site. <i>p.2, Section: Lighting</i>	Lighting	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.14 Part B.08 - Assessment of Effects – Lighting, Section 5.2.3 Attachment 18 SOE of Ms Macdonald, Section 3.2	This is addressed in Section 3.2 in the SOE of Ms Macdonald. As set out in the Substantive Application document, lighting will be designed in accordance with the content of the assessment provided by Pedersen Read.
State that they feel work operations requiring additional lighting (beyond street lighting at night) would add to the light pollution already coming from the Fonterra site. <i>p.3, Section: Lighting</i>	Lighting	Attachment 18 SOE of Ms Macdonald, Sections 3.3 & 3.4	This is addressed in Section 3.3 and 3.4 of the SOE of Ms Macdonald.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concern regarding hours of construction being Monday to Saturday (i.e. 6 days a week) and the noise this will generate. <i>p.3, Section: Construction</i>	Noise	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.4.2 Part B.06 - Noise Assessment	The noise assessment anticipates that daytime construction activities can comply with the daytime construction noise criteria (in the District Plan) at all nearby sensitive receivers. The assessment was undertaken with the understanding that higher noise generating activities will be undertaken during the daytime hours of 7am – 7pm, Monday to Friday, and 7:30am – 6pm on Saturdays. High noise emitting night-time construction activity is not proposed.
Concern regarding controls in place to suppress dust during summer. <i>p.3, Section: Construction</i>	Earthworks	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.4.5 Part B.16 – Civil Works and Earthworks, Section 5 Part C.01 - Proposed Conditions - Dunedin City Council Part D.01 – Draft Construction Management Plan	All works will occur in accordance with best practice dust control measures, as set out in DCC Condition 21, the Draft Construction Management Plan and Civil Works and Earthworks Assessment that sets out how dust will be managed.

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Concern regarding the increase in heavy traffic movements down Gordon Road and the risk to pedestrians (primarily the elderly population). State that this proposal and the need for a heavy traffic bypass should not be separated. <i>p.3, Section: Traffic</i>	Transportation	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.14 B.12 - Integrated Transport Assessment Attachment 10 SOE of Mr Rossiter, Section 6	This is addressed in Section 6 in the SOE of Mr Rossiter. It is not anticipated that an increase in heavy vehicles travelling straight along Gordon Road will contribute to a noticeable change in crash rates, especially given the urban speed environment.
Seeks clarification regarding the five-road intersection (SH87 into Dukes Road) and the suitability for turning trucks. <i>p.3, Section: Traffic</i>	Transportation	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.14 B.12 - Integrated Transport Assessment, Section 8.2 Part C.01 - Proposed Conditions – Dunedin City Council Attachment 25 - Plan SH87 Right Turn	SLPL have agreed to a condition (DCC Condition 75A) relating to the SH 87 right turn into Dukes Road North, as set out in the NZTA table.



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Seeks clarification regarding number of truck movements per day between Fonterra and the site. <i>p.3, Section: Expert Panel</i>	Transportation	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.14 B.12 - Integrated Transport Assessment, Section 7.2.3	As set out in the Transport Assessment, the transfer of containers from Fonterra's site on Dukes Road North and the new Container Serving Depot within the SLIP is to involve up to 18,000 short distance truck movements. These movements will occur via the Dukes Road North entrance and not Stedman Road.
States there are other areas away from residential/ rural residential properties that would have been better suited to the proposal <i>p.3, Section: Summary</i>	Planning	Attachment 5 SOE of Mr Kyle and Ms Hankey, Section 6 Attachment 17 SOE of Mr Driver, Section 2	Mr Driver in his SOE explains why the Mosgiel site is the most suitable and alternatives (such as the Milburn site or using the existing land) are not appropriate. This is also addressed in Section 6 in the SOE of Mr Kyle and Ms Hankey.
States the proposal will impact on possible future rezoning of the north side of Mosgiel (for housing development) <i>p.3, Section: Summary</i>	Planning		It is unlikely that the SLIP will adversely affect any future residential development on the northern side of Mosgiel, should such development occur.

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Minister for Infrastructure			
Writes in support of SLIP as a project reflecting the Government's economic growth and infrastructure priorities.			SLPL appreciates the commenter's support for the SLIP Project.
Minister for the South Island & Associate Minister for Transport			
Supports the application and considers that the project will deliver significant economic benefits to Otago and the wider southern South Island.			SLPL appreciates the commenter's support for the SLIP Project.



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Mosgiel Taieri Community Board			
MTCB supports the economic opportunities the Southern Link Inland Port could bring to Mosgiel, Dunedin and the wider Southern region, but seeks assurance that roading and stormwater infrastructure will be planned, funded and delivered before the development reaches full scale.	Transportation Stormwater	Part A.02A - Southern Link Inland Port - Substantive Application, Section 2.4 Part B.13 – Stormwater Assessment, pages 4 & 17	As set out in the Substantive Application document, all planned internal roading and stormwater infrastructure associated with the SLIP will be completed within Stages 1-3 of the development, i.e. before the development has reached full scale. Any roading infrastructure constructed within Stages 2 and 3 is to be internal. The SH 87 / Dukes Road North intersection is addressed in the NZTA comments below.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Moving freight from SH88 and Dunedin's urban roads to rail may reduce traffic and emissions there, but it would transfer pressure to SH87 and other Mosgiel roads. Mitigation should therefore be delivered before additional freight arrives, so benefits to one community are not achieved at another's expense. <i>p. 1, Section: Key Points</i>	Transportation	Part A.02A - Southern Link Inland Port - Substantive Application, Section 9.3.9 B.12 - Integrated Transport Assessment, Section 9.2.2 Response to Minute 4 – Integrated Transport Assessment Addendum, pages 22 – 23 Attachment 10 SOE of Mr Rossiter, Section 2	The Transport Assessment has addressed traffic effects associated with the SLIP, including the existing state highway network. The Transport Assessment 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 transport growth 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.



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Without coordinated upgrades, increased freight traffic, extensive sealed surfaces and altered watercourses could impose safety, congestion and flood risks on Mosgiel residents and vulnerable road users. <i>p.1, Section: Key Points</i>	Transportation Civil Engineering	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.14 B.12 - Integrated Transport Assessment Attachment 10 SOE of Mr Rossiter, Section 6 B.13 - Stormwater Assessment Attachment 10 SOE of Mr Rossiter, Section 6	This is addressed in Section 6 in the SOE of Mr Rossiter.
Expected heavy-traffic volumes at full capacity, including stage 3 warehousing and freight forwarding, remain unclear. MTCB requests an independent assessment (in addition to the NZTA assessment) of projected movements before consent is granted. <i>p.1, Section: Key Points</i>	Transportation	B.12 - Integrated Transport Assessment, Section 7.2	Both NZTA and DCC Transport have engaged in pre-application discussion, review of the application, and have submitted comments on the transportation aspects of the application. DCC Transport does not dispute the projected volumes outlined in the Integrated Transport Assessment.



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Upgrades to SH87/Gordon Road and an alternative access corridor, including Riccarton Road–Dukes Road, should be linked to the consent process. Independent experts should identify the road, intersection and speed-limit changes needed to protect vulnerable users, particularly where intersections already operate beyond capacity. <i>p.1, Section: Key Points</i>	Transportation	B.12 – Integrated Transport Assessment, page 44 – 47 & 52 Attachment 10 SOE of Mr Rossiter, Section 2	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 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. The SH 87 / NZTA intersection is addressed in the NZTA comments below.



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Reducing truck movements on SH88 and through Dunedin would shift traffic and emissions to Mosgiel. Consent conditions should ensure that wider benefits are not achieved at Mosgiel's expense and that local impacts are mitigated before freight volumes increase. <i>p.1, Section: Key Points</i>	Transportation	Part A.02A - Southern Link Inland Port - Substantive Application, Sections 6.14.2 & 9.3.9 B.12 - Integrated Transport Assessment, Sections 8 & 9.2.2 Response to Minute 4 – Integrated Transport Assessment Addendum, pages 22 – 23	See responses above.



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Consent conditions should materially address risks to pedestrians, cyclists, school children, older residents, families and other users of narrow freight corridors. MTCB requests an independent local assessment in addition to NZTA's national-level analysis. <i>p.1, Section: Key Points</i>	Transportation	B.12 - Integrated Transport Assessment, Section 8.4 Attachment 10 SOE of Mr Rossiter, Section 6 Part C.01 - Proposed Conditions – Dunedin City Council	Both NZTA and DCC Transport have engaged in pre-application discussions, reviews of the application, and have submitted comments on the transportation aspects of the application. NZTA's analysis is not limited to a national level and does provide analysis at a local level. These matters are addressed in the Transport Assessment and in Section 6 of the SOE prepared by Mr Rossiter. DCC Conditions 72 – 75A have been drafted in accordance with these recommendations and as such it is considered that these matters have been appropriately addressed.
Measures to address congestion and queuing between SH1 and Mosgiel should be in place before freight volumes rise further. <i>p.1, Section: Key Points</i>	Transportation	B.12 – Integrated Transport Assessment, page 44 – 47 & 52 Attachment 10 SOE of Mr Rossiter, Section 2	Existing traffic and wider roading constraints are acknowledged but are not a consequence of the proposed SLIP. Broader transport network issues are outside the scope of this application.



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The Board requests that consent conditions require the identification, planning and funding pathways (local and central government) for necessary transport upgrades prior to the commencement of later development stages - funding for the necessary roading infrastructure in Mosgiel is not currently in the long-term planning for DCC or the NZTA and this needs to be rectified. <i>p.1, Section: Key Points</i>	Transportation		See above comment.
Moving freight from SH88 and Dunedin's urban roads to rail may reduce traffic and emissions there, but it would transfer pressure to SH87 and other Mosgiel roads. Mitigation should therefore be delivered before additional freight arrives, so benefits to one community are not achieved at another's expense. <i>p.2, Section: Benefits of the project for Mosgiel and the Wider Region</i>	Transportation	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.14.2 & 9.3.9 B.12 - Integrated Transport Assessment, Sections 8 & 9.2.2 Attachment 16 SOE of Mr Horan, Section 2	Environmental performance commitments are addressed in Section 2 in the SOE of Mr Horan. As discussed above, the Project's traffic effects are not expected to result in noticeable impacts on Gordon Road (SH87) or the wider Mosgiel road network.



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MTCB asks that consent conditions secure commitments from central government and the DCC to accelerate these upgrades. An independent assessment should quantify freight traffic at each development stage and test projections against comparable inland ports with warehousing operations. MTCB is concerned that current projections may underestimate traffic in stages 1 and 2 and once warehousing in stage 3 serves Central Otago, centres north and south of Dunedin, and local stores. <i>p.2, Section: A significant proportion of Dunedin's growth is occurring in Mosgiel but infrastructure upgrades don't reflect this</i>	Transportation	B.12 - Integrated Transport Assessment	Consent conditions cannot lawfully require any actions to be undertaken by third parties. These matters have been adequately assessed in the Transport Assessment.



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The MTCB acknowledges that the Otago Regional Council will provide technical expertise on the project's stormwater and flood-mitigation requirements. We also ask the expert panel to consider an independent assessment of any additional flood risk or changes to stormwater runoff that could result from the extensive sealed surfaces and building roofs proposed for stage 3, including warehousing and distribution facilities. <i>p.3, Section: Flood Mitigation</i>	Natural Hazards Stormwater	Appendix 2 – Otago Regional Council's – Comments on Applicant's Proposed Consent Conditions	ORC had the Projects stormwater and flood mitigation design peer reviewed by an independent expert. This report concluded that effects can be effectively managed as proposed in the application.
The inland port may affect neighbouring properties through light spill, operational noise, construction dust, road closures, and truck braking and turning at Dukes Road. MTCB requests an independent assessment, with particular attention to overnight effects on nearby homes and to White Robe Lodge's livestock welfare and breeding operations. Potential mitigations include downward-facing lighting, a no-engine-braking zone, restricted operating hours, acoustic barriers around the site and	Noise Lighting	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.4.2 & 6.16 Part B.06 - Noise Assessment Part C.01 - Proposed Conditions – Dunedin City Council	As set out in the Substantive Application and Noise Assessment, higher noise generating activities associated with construction will be typically during daytime hours. High noise emitting night-time construction activity is not proposed. The SLIP is proposed to operate 24 hours a day, 7 days a week to meet demand. The operational noise effects have been assessed as reasonable and will be mitigated as far as practicable, noting that daytime activity noise will be lower than existing noise levels in the area and will be of a similar character. Although there is more variability in night-time



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construction scheduling that avoids the foaling season. <i>p.3, Section: Additional Community Concerns</i>		Part B.08 - Assessment of Environmental Effects – Lighting, section 5.2 Attachment 18 SOE of Ms Macdonald, Section 3.3	noise levels, the predicted noise levels at the closest receivers are similar to the existing average levels. Noise mitigation measures have been built into every stage of design and are representative of the best practicable options. DCC Condition 58 addresses noise limits and DCC Condition 60 and 60A addresses mitigation measures. Lighting effects are addressed in Section 3.3 in the SOE by Ms Macdonald. As set out in the Substantive Application document, external lighting is to be installed with zero upward component, without tilt, and with appropriate shielding to control and minimise glare. DCC Conditions 61-67 propose limiting the maximum colour temperature of lighting, restricting light spill along the southern acoustic wall to no more than 3 lux, controlling the design of exterior lighting, restricting buildings on the Site from having transparent or translucent facades, and requiring lighting of the railway siding to comply with KiwiRail lighting standards and guidance. With these measures implemented, the assessment completed by Pederson Read finds the lighting effects to be less than minor.

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Members of the community have also expressed some concern that the road frontage will detract from the rural character of the location so there has been a suggestion that the trees on the road frontage should be retained to screen the industrial buildings and operations beyond. <i>p.3, Section: Additional Community Concerns</i>	Landscape	Section 6.8 - Part A.02A - Southern Link Inland Port - Substantive Application Part B.07 - Updated Landscape and Natural Character Assessment, pages 11 and 15 Attachment 11 SOE of Ms Gilbert, Section 4.3 Part C.01 - Proposed Conditions – Dunedin City Council	This is addressed in Section 4.3 in the SOE of Ms Gilbert. Whilst it will be necessary to remove most of the trees and hedgerows on the site to enable construction of the SLIP, where possible SLPL will endeavour to retain existing screening vegetation where possible. The existing trees along Silver Stream that are currently screening the Site will be retained (DCC Condition 69). Additional planting to screen and soften the appearance of the SLIP will be undertaken in accordance with the Landscape Management Plan (DCC Condition 69).
There has also been some concern from the community that the SLIP development is being considered in isolation from other significant developments in Mosgiel and beyond. The MTCB requests that this development be considered alongside these other developments to ensure all potential interacting factors are assessed. <i>p.3, Section: Additional Community Concerns</i>	Planning	Attachment 5 SOE of Mr Kyle and Ms Hankey, Section 6	This is addressed in Section 6 in the SOE of Mr Kyle and Ms Hankey.



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New Zealand Transport Agency			
NZTA notes that, in Section 4.1.1.1 of the ITA Addendum it is noted that the storage length of the existing right turn bay at the intersection of SH87 and Dukes Road North is not sufficient to accommodate an articulated vehicle. NZTA consider that SLPL should extend the existing right turn bay at this intersection to make it able to accommodate an articulated vehicle. That is, it should be upgraded to comply with NZTA's heavy commercial vehicle (HCV) design vehicle (that is, a quad semi or articulated vehicle). If the Panel is minded to grant consent to SLPL, NZTA recommend that the Panel impose a condition on the consent requiring the consent holder undertake this upgrade prior to the Stage 1 of the proposed development becoming operational. NZTA is willing to work with the Panel and SLPL to draft a condition(s) to this end. <i>p.1, Paragraph 2.4</i>	Transportation	Attachment 10 SOE of Mr Rossiter, Section 3 Part C.01 - Proposed Conditions – Dunedin City Council Attachment 25 - Plan SH87 Right Turn and Appendix D of the DCC proposed conditions	This is addressed in Section 3 in the SOE of Chris Rossiter. SLPL has agreed to fund the alterations to line markings that would be necessary to create a 20 m long, 3.5m wide, right turn bay. The agreed works being largely 'cosmetic' in terms of rearranging the current use of the road with road markings to accommodate the right turn bay pocket as described. It has been agreed with NZTA that the existing right turn bay taper is acceptable and all that is required in respect of intersection upgrade. This is shown in the plan that is Attachment 25 to the s55 response to comments. A condition has been proposed to this effect (DCC Condition 75A).

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NZTA is comfortable with the methodology and approach used to calculate vehicle movements for Stage 1 of the proposed development, with the exception of Table 2-5 of the Addendum that removes trips from south of Mosgiel to the new inland port. This appears to be inconsistent with Table 2-2 of the Addendum, which shows that 1,700 of the 6,700 Aggregated Dynes/Icon heavy vehicle movements per annum have an origin or destination south of Mosgiel. It is not explicitly addressed in the ITA whether these trips are still expected to occur and, if so, whether they are assuming SH1 and SH87 will be used, as opposed to Riccarton Road and Dukes Road being used. It may be that SLPL has removed the trips from the south in Stage 1 as they are existing trucks travelling to the Fonterra depot from the south. The absence of information on this matter means that NZTA is unable to fully understand the impacts of the proposed development on SH1 and SH87, and therefore what, if any, mitigation measures would be necessary to manage effects on the safety and efficiency of the state highway network.	Transportation	Attachment 10 SOE of Mr Rossiter, Section 3	This is addressed in Section 3 in the SOE of Mr Rossiter. Analysis is provided demonstrating no changes are made to trips to and from the south of Mosgiel.

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NZTA requests that the Panel ask SLPL to provide further information confirming why those heavy vehicle movements have been removed and to provide confirmation whether trips originating from the south should be accounted for, and for this information to be provided to NZTA for further comment. <i>p. 1, Paragraph 2.5</i>			
The ITA does not address what the impact of route choice may be based on different distribution patterns potentially used by future tenants. This is a significant uncertainty, and, depending on HCV trip distribution, could necessitate the need for the SH87 and Dukes Road North intersection to be upgraded beyond that suggested in paragraph 2.4 above. NZTA requests that the Panel ask SLPL to provide further information addressing this matter, and for this information to be provided to NZTA for further comment. <i>p. 1-2, Paragraph 2.6</i>	Transportation	Attachment 10 SOE of Mr Rossiter, Section 6	This is addressed in Section 6 in the SOE of Mr Rossiter. The choice of route taken by other operators is not within SLPL's control. This said, other operators of heavy vehicles are likely to utilise SH87, and Dukes Road North given their existing use as heavy vehicle routes.



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The information SLPL have provided (on the number of light vehicle movements per day at full development) minimises the impact on the highway of these vehicle movements by suggesting staff will be travelling from the local area. NZTA suggests that it is possible that, for Stage 1, that all current staff will transfer to the new location and so may come from outside of Mosgiel. SLPL have previously indicated that staff shift change times may be outside of peak traffic periods on the state highway network, such that even if staff are coming from beyond Mosgiel there may be minimal impact on the functioning of the state highway network. However, NZTA considers it would be useful for this matter to be addressed explicitly by SLPL, so that there is certainty in respect to the traffic effects on the state highway network. NZTA requests that the Panel ask SLPL to provide further information on the expected traffic impacts associated with anticipated staff light vehicle	Transportation	Attachment 10 SOE of Mr Rossiter, Section 3	This is addressed in Section 3 in the SOE of Mr Rossiter. SLPL cannot control staff residential locations and origins will likely be distributed across the district.

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movements, and for this information to be provided to NZTA for further comment. <i>p.2, Paragraph 2.7</i>			
Growth areas (Central Otago and north of Dunedin) discussed in pre-Application communication are not mentioned in the ITA Addendum. Future growth of the proposed development, which generates vehicle movements, and especially HCV, beyond that forecast in the Application, could adversely impact the safe and efficient functioning of the state highway network and would need further traffic impact assessment and potential mitigation measures to be implemented. NZTA would request that, if the Panel is minded to granted consent to SLPL, that a consent condition caps the maximum HCV movements associated with the proposed development based on the HCV volumes described in the ITA Addendum. NZTA is willing to work with the Panel and SLPL to draft a condition(s) to this end.	Transportation	Attachment 10 SOE of Mr Rossiter, Section 3	This is addressed in Section 3 in the SOE of Mr Rossiter. SLPL acknowledges existing transport network constraints; however, these are pre-existing conditions and not a result of the proposed SLIP. Addressing broader network issues falls outside the scope of this application.



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p.2, Paragraph 2.8

The ITA Addendum includes a statement that ‘...funding has been allocated for investigation and implementation of Mosgiel Freight Improvements in the 2024 to 2030 period’. NZTA does not have a Mosgiel Freight Improvements project. NZTA does have a SH1/SH87 Optimisation Improvements project, but this is focussed on identifying improvements at the entrance to Mosgiel that can reduce congestion, improve travel time and support freight movement, with key intersections. NZTA is not completing specific freight improvements, however improvements to travel time reliability and reductions in congestion will help all road users. NZTAs project scope for the optimisation improvements does not include the SH87/Dukes Road intersection.	Transportation	Attachment 10 SOE of Mr Rossiter, Section 3	Refer to above comment.
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p.2, Paragraph 2.9



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Any state highway upgrade works will need a developer agreement in place between SLPL and NZTA to set out, among other matters, the roles and responsibilities of each party and the provision of detailed design to NZTA and NZTA approval of the detailed design. This Agreement will need to be set up through a process that sits outside of the FTAA process and is required in addition to consent conditions requiring improvements to the state highway. <i>p.2-3, Paragraph 2.10</i>	Transportation	Attachment 10 SOE of Mr Rossiter, Section 2	This is addressed in Section 2 the SOE of Mr Rossiter.
Paul and Rochelle Urquhart			
We believe this planned project is a very logical progression for the growth and productivity of our Port and more importantly our region. It appears that substantial work and planning have been undertaken, with good communication to us, on what is a pretty ideal site overall, and we are satisfied that the overall effects to us will be minimal, and as such we welcome the commitment and investment in our area.			SLPL appreciates the commenter's support for the SLIP Project.



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Stockdale Farm Ltd			
Submits, as a neighbouring landowner, in support of the project and the economic/ employment opportunities provided to Mosgiel and the Otago region.			SLPL appreciates the commenter's support for the SLIP Project.
White Robe Lodge and Marcus Corban (supporting statement)			
States their primary concern is compatibility of the project with their current specialist operation located immediately opposite the proposed inland port. <i>p.1, Section: Our primary concern</i>	Equine Specialist	Attachment 20 SOE of Mr Grierson, Section 3	This is addressed in Section 3 in the SOE of Mr Grierson. Horses are generally very adaptable animals. They cope well with changes to their environment, including a reasonable level of ongoing noise or activity.
Consultation and site visit occurred after key planning documents and technical assessments had been completed. As such, the assessment does not fully encapsulate the nature of their breeding operation, the specialised facilities, or the cumulative effects on animal welfare, staff safety and day-to-day operations. <i>p.1, Section: Our primary concern</i>	Equine Specialist	Attachment 20 SOE of Mr Grierson, Section 3	This is addressed in Section 3 in the SOE of Mr Grierson.

Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concerns regarding Animal welfare. Specifically, increases in noise, heavy vehicle movements, vibration, lighting, dust, and unpredictable activity may impact on horse behaviour and wellbeing. Cites the Animal Welfare Code. <i>p.2, Section: Animal Welfare</i>	Equine Specialist Noise Lighting	Attachment 20 SOE of Mr Grierson, Section 3 Attachment 19 SOE of Mr Shanks, Section 4 Attachment 18 SOE of Ms Macdonald, Section 4	This is addressed in Section 3 in the SOE of Mr Grierson (Equine Specialist), Section 4 in the SOE of Mr Shanks (noise), and Section 4 in the SOE of Ms Macdonald (lighting). Horses are generally very adaptable animals and cope well with changes to their environment. This includes a reasonable level of ongoing noise or activity.
Concerns regarding lighting, particularly the presence of artificial light and significant change to the existing rural night-time environment. Continual presence of artificial lighting and night-time activity may disturb the horses and alter the working/ living environment for staff residing on the foaling unit. <i>p.3, Section: Lighting</i>	Lighting Equine Specialist	B.08 - Assessment of Environmental Effects – Lighting, Section 5.1 Attachment 18 SOE of Ms Macdonald, Section 4 Attachment 20 SOE of Mr Grierson, Section 3 Part A.02A - Southern Link Inland Port - Substantive Application, Section 2.25.2	This is addressed in Section 4 in the SOE of Ms Macdonald (Lighting) and Section 3 in the SOE of and Mr Grierson (Equine Specialist). Mr Grierson notes that artificial lighting (including night-time lighting) is typically required and is standard practice for monitoring wet mares and providing optimal breeding conditions for dry mares. Notably, Ms Macdonald assesses that, from a lighting perspective, the proposed mitigation measures are consistent with the best-practice lighting design principles as set out in the Australian Government's <i>National Light Pollution Guidelines for Wildlife</i> which is also referred to in the Lighting Assessment.

Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
States that the cumulative effects of night-time lighting have not been adequately recognised or assessed, particularly when considered alongside the increased heavy vehicle movements, industrial noise, dust and other operational activities. The proposed mitigation measures may reduce some individual effects but do not address the cumulative impact. <i>p.4, Section: Lighting</i>	Lighting	B.08 - Assessment of Environmental Effects – Lighting, Section 3.2.3	The existing lighting environment is considered in the Landscape and Natural Character Effects Assessment. The assessment outlines that the SLIP is proposed in an already lit environment in the industrial area adjacent to the site, and lighting effects will reinforce the extension of industrial character eastward.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
The continual movement of heavy vehicles, engine noise, air brake release, gear changes, and vibration will create an environment that is fundamentally different from that currently experienced by horses, staff and visitors. The increased frequency of heavy vehicle movements has the potential to make the activities currently carried out (e.g. moving mares/foals between paddocks, veterinary examinations, etc.) difficult and increases risks to horses and staff.<i>p.4, Section: Heavy Vehicle Movements</i>	Noise Equine Specialist	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.15 Part B.06 - Noise Assessment Attachment 19 SOE of Mr Shanks, Section 4 Attachment 20 SOE of Mr Grierson, Section 3	This is addressed in Section 3 in the SOEs of Mr Shanks and Section 3 in the SOE of Mr Grierson. As set out in the Noise Assessment, it is predicted that the operational noise from the SLIP will generally comply with the daytime and nighttime noise limits of the District Plan. However, instances of operational noise exceeding the permitted noise standards in the District Plan are proposed in circumstances where it is considered appropriate for such exceedances occur. Additionally, it is noted by Mr Shanks that the character of the noise will be similar to some activity already present in the area. Mr Grierson notes in his SOE that in his experience of horses' responses to noise is that they cope well with changes to their environment, including a reasonable level of ongoing noise and they are adaptable animals.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
States that the above has not been considered in the relation to cumulative effects, particularly the effects on animal welfare, staff safety and day-to-day operations. <i>p.4, Section: Heavy Vehicle Movements</i>	Equine Specialist	Attachment 20 SOE of Mr Grierson, Section 3	This is addressed in Section 3 in the SOE of Mr Grierson. Horses are generally very adaptable animals. They cope well with changes to their environment, including a reasonable level of ongoing noise or activity.
Possible dust and airborne contaminants are a particular concern relating to newborn foals (developing respiratory systems), pregnant mares, other livestock, and staff. Maintaining high standards of air quality is important for animal health and welfare. <i>p.4-5, Section: Dust and Air Quality</i>	Earthworks	Part D.02 – Construction Management Plan, Section 8	Dust risk during construction phase will be managed by the implementation of the construction management plan using best practice dust suppression.
Concern that the proposed noise barrier will not adequately shield the property from the noise generated within the port. <i>p.5, Section: Noise</i>	Noise	Part B.06 - Noise Assessment Attachment 19 SOE of Mr Shanks, Section 4	This is addressed in Section 4 in the SOE of Mr Shanks. The assessment undertaken by Marshall Day predicts that the noise from construction and operational stages can achieve reasonable noise levels at all nearby receivers. This assessment accounts for the proposed mitigation measures, including noise barriers.

Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concern that reductions in background noise will not eliminate sudden/ unpredictable noise. Noise of this nature may spook or panic the horses – particularly because it is not consistent. This presents significant animal welfare and health and safety concerns – particularly stress responses for pregnant mares. <i>p.5-6, Section: Noise</i>	Equine Specialist	Attachment 20 SOE of Mr Grierson, Section 3	This is addressed in Section 3 in the SOE of Mr Grierson.
Comments that the proposed acoustic mitigation requires further consideration to ensure that it provides an appropriate level of protection for the horses and staff. <i>p.7, Section: Noise</i>	Noise	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.4.2 Part B.06 - Noise Assessment Attachment 19 SOE of Mr Shanks, Section 4	This is addressed in Section 4 in the SOE of Mr Shanks. The assessment undertaken by Marshall Day predicts that the noise from construction and operational stages can achieve reasonable noise levels at all nearby receivers. This assessment accounts for proposed mitigation measures.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concern that the differing land use between the port (industrial) and the breeding operation (neighbouring rural land) are not compatible. Their operation depends on providing a calm, safe, and predictable environment for the horses. <i>p.7, Section: Land Use Compatibility</i>	Equine Specialist	Attachment 20 SOE of Mr Grierson, Sections 3	This is addressed in Sections 3 in the SOE of Mr Grierson. These concerns do not, from a horse welfare perspective, mean the SLIP and White Robe Lodge cannot operate alongside each other.
Main concern is not with any single aspect of the proposal, rather with the cumulative impacts outlined above and whether they are adequately addressed by the proposed mitigation measures. <i>p.8, Section: Conclusion</i>	Planning	Part A.02A - Southern Link Inland Port - Substantive Application Attachment 20 SOE of Mr Grierson, Sections 3	Cumulative effects have been considered in the relevant technical assessments, where applicable. This is addressed in Sections 3 in the SOE of Mr Grierson.
Marcus Corban Bloodstock: Main concern is the building of the inland port opposite the foaling unit. Constant noise, lights, and trucks may put stress on the pregnant mares. Economic concern as foals they are carrying are worth a lot of money. <i>p.2, Section: Conclusion</i>	Equine Specialist	Attachment 20 SOE of Mr Grierson, Sections 3	This is addressed in Sections 3 in the SOE of Mr Grierson. These concerns do not, from a horse welfare perspective, mean the SLIP and White Robe Lodge cannot operate alongside each other.

Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Jane and Bernie McLeod			
Concern over proximity to residential properties, in particular a 190-house subdivision located 630 m away, and the White Robe Lodge stud. <i>p. 1</i>	Equine Specialist Planning	Attachment 20 SOE of Mr Grierson, Section 3	Amenity impacts from the SLIP are addressed in part through project design, layout and implementation of recommended management measures, which are required by the proposed conditions. Further, the site has been identified in the Future Development Strategy as a suitable location for the development of an Inland Port, supporting the argument for establishment of the activity at this location. Amenity in this locality is already influenced by the existing industrial and railway activity. The subject site is also a natural extension to this existing industrial activity on the opposite side of Stedman Road. Impacts to White Robe Lodge stud is addressed in Section 3 in the SOE of Mr Grierson.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concern regarding a “lack of roading infrastructure, irrespective of what NZTA say”. <i>p.1</i>	Transportation	B.12 - Integrated Transport Assessment	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 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.
Concern for heightened flood risk to the Silverstream, neighbours, and the wider Mosgiel area, particularly in the context of previous flood events. <i>p.1 & 2, Section: Flood risk to The Silver Stream, to Mosgiel and neighbours</i>	Stormwater	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.11 B.13 - Stormwater Assessment, pages 15 & 39 Attachment 6 SOE of Mr Craig, section 5	This is addressed in Section 5 in the SOE of Mr Craig.

Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
States that Dynes and Port Otago should cooperate with Calder Stewart on their inland port in Milburn being built at a “better site”, rather than compete. Also concern regarding the possibility that the site may take logging trucks. “We feel that taxpayer money should not be used to duplicate similar, privately funded, better sited projects.” <i>p. 1, & 2-3, Section: Alternative sites exist</i>	Planning	Attachment 17 SOE of Mr Driver, Section 2	Mr Driver explains why the Mosgiel site is the most suitable for the SLIP and alternatives (such as the Milburn site or using the existing land) are not appropriate. This is also addressed in Section 2 of the SOE of Mr Driver.
States that the 7.6 hectares of rail connected industrial land behind Fonterra will meet the needs arising from the closure of the Strathallen depot. <i>p. 1</i>	Planning	Attachment 17 SOE of Mr Driver, Section 2	This is addressed in Section 2 the SOE of Mr Driver.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concern over negative effects on the amenity of the residential area, particularly at nighttime. <i>p. 1</i>	Landscape Lighting	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.8 Part B.07 - Updated Landscape and Natural Character Assessment, page 26	Amenity impacts are addressed in part through Project design, layout and implementation of recommended management measures, which are required by the proposed conditions. Further, the site has been identified in the Future Development Strategy as a suitable location for the development of an Inland Port, supporting the argument for establishment of the activity at this location. Amenity in this locality is already influenced by the existing industrial and railway activity. The site is a natural extension to this existing industrial activity on the opposite side of Stedman Road. The SLIP may result in adverse amenity effects from the residential area to the southwest of the site. However, existing trees alongside Silver Stream and in the area more generally provide significant screening between the site and the residential area (Figure 6 in the Landscape Assessment). There may be some glimpses through vegetation to stacked containers, particularly when deciduous trees are not in leaf, and some awareness of night lighting.

Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concern regarding adverse effects on the landscape values of the surrounding areas. <i>p.1</i>	Landscape	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.8 Part B.07 - Updated Landscape and Natural Character Assessment, page 17-29 Attachment 11 SOE of Ms Gilbert, Section 5.8 – 5.13 Part C.01 - Proposed Conditions - Dunedin City Council	Physical / landscape character effects have been assessed in the Landscape Assessment, in the SOE of Ms Gilbert and the Dunedin City Council conditions 68 and 71B.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concern over congestion and road safety issues from additional heavy vehicles on Mosgiel's main street. <i>p.1, Section: Transport pressure</i>	Transportation	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.14.2 & 9.3.9 B.12 - Integrated Transport Assessment, Sections 8 & 9.2.2 Attachment 16 SOE of Mr Horan, Section 2	As set out in the Substantive Application and Transport Assessment, there is to be increase of approximately 150 heavy vehicles using Gordon Road (SH87) per day once the SLIP is fully developed. This increase in traffic volumes is representative of less than 1% of the existing total traffic volume. Furthermore, the change in hourly volumes is less than the typical daily variation in volumes on Gordon Road. As such, the increase is not expected to contribute to any noticeable effects on the operation of the road. In regard to effects on Mosgiel roads, it is anticipated that the increase in travel demand will not result in noticeable effects on the Mosgiel Road network. Traffic volumes are to remain within the capacity of the roading network and travel demand will generally be dispersed. Light vehicle movements associated with staff are to largely correlate to early morning arrivals and mid-afternoon departures.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concern regarding air quality, especially because of Mosgiel's inversion layers. <i>p.1, Section: Transport Pressure</i>	Air Quality	Part A.02 – Substantive Application Report, page 163, 168-169 Part D.01 – Draft Construction Management Plan Part C.01 - Proposed Conditions - Dunedin City Council	The SLIP will provide a pivotal role in supporting the transition to a low-carbon economy by significantly reducing greenhouse gas emissions associated with freight transport through a predicted 70% CO₂e saving from the mode-shift of freight from road to rail. There is potential for dust to be generated during bulk earthworks activities during construction. Standard dust suppression and management practices will be implemented including the staging of earthworks, hydroseeding of any bunds or stockpiles, and water application / spraying (as necessary). Management measure will be included in the Construction Management Plan (CMP) that will be implemented as a DCC Condition 21, which will include detailed content and performance indicators of methods to control dust during earthworks. With the implementation of these practices via the CMP, it is considered any dust effects generated by the bulk earthworks will be appropriately avoided or mitigated.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
“In 2003 The environment Court stopped the development of a wood processing plant by City Forests on this same site. They described the subject site as being part of the clear demarcation between the rural area and the 4 more mixed zones to the west of the Taieri Branch Line and to the south of Silver Stream. The Environment court found that the proposal would have real and ongoing amenity effects for neighbours that would be more than minor, that any job creation could occur in an alternative site, this is all still true.” <i>p.2 - Section: Alternative sites exist</i>			The 2004 Environment Court (<i>Guardians of North Taieri Inc v Dunedin City Council</i> [2004] NZEnvC C4/2004) decision concerned an application for a different activity (a City Forests timber processing plant) which was assessed as a non-complying activity under the then-operative district plan which did not provide for any industrial-type activity in the Rural zone. The timber processing plant under appeal was substantively different in nature to the SLIP, including it did not utilise the railway meaning traffic effects were quite different. The current application is assessed 22 years later, under a different Act (the Fast-track Approvals Act 2024), against a different test, and the site has since been specifically identified in the Future Development Strategy as suitable for this type of use. The Court's findings on noise, visual effects timeframes and soil-capacity loss were specific to that sawmill proposal, and can have no weight in this process.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
“It is deeply unsettling to see a publicly owned regional asset like Port Otago enter a tight commercial relationship with a private enterprise like Dynes Transport, blurring the line between public accountability and private profit and we would hope that the expert panel will investigate how this is structured and monitored. As ORC rate payers, we do not approve of this relationship. One can only hope that the Otago Regional Council employees involved in reviewing this application, for an ORC owned company are doing so without fear or favour.” <i>p.3, Section: Alternative sites exist</i>			Throughout the development of the SLIP, engagement with the ORC has been an important part of the consenting process. This has included the provision of technical assessments, independent peer reviews, ongoing discussions with consultants engaged by ORC, and amendments to proposed conditions and design measures in response to matters raised during the assessment process. It is understood that ORC has engaged consultants to assist it, in order to ensure independence. The suggestion that the Panel should investigate the structure of SLPL and require that it be monitored, is outside the scope of the FTAA process and conditions that can be imposed.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Minister for Regional Development			
On balance, based on the economic assessment provided by the applicant, I consider the project may be regionally significant. The quantified construction impacts, including GDP and employment effects, are modest when viewed against the scale of the Otago economy. Its stronger regional significance lies in its function as enabling infrastructure for the freight and export economy. <i>p.2, Section: Regional Development comments, Paragraph 5</i>	Economics		SLPL appreciates the commenter's support for the SLIP Project.
Parliamentary Commissioner for the Environment			
The applicant's land assessment sets out what appear to be reasonable constraints. However, because the applicant has determined that the project meets the exemption criteria, they have not assessed the effects of the loss of highly productive land.	Land	Part B.01 – Land assessment Legal Submissions, Section 3 Attachment 5 SOE of Mr Kyle and Ms Hankey, Section 7	The NPS-HPL provides policy direction on when the loss of NPS-HPL needs to be avoided. The Land Assessment demonstrates that cl 3.10 of the NPS-HPL is met, meaning that from a policy perspective the loss of HPL does not need to be avoided. The NPS-HPL is clear that territorial authorities may allow highly productive land to be used or developed if satisfied that



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
In my view, this is the key issue the panel will need to determine. <i>p.1</i>			clause 3.10 is met. There is no effects threshold inherent in the NPS-HPL itself. However, in terms of the adverse effect of the loss of HPL independent from the policy direction of the NPS-HPL, the Land Assessment concludes that effect is not significant here. The reasons for that conclusion are consistent with the reasons the application meets cl 3.10, including: > permanent and long-term constraints relating to location, soil drainage and flooding risk mean that land-based primary production cannot be viably sustained (economically) on the site for at least 30 years > a full evaluation of reasonably practicable alternative land-based primary production, land management improvements, boundary adjustments, and alternative production strategies has been undertaken which confirmed the permanent and long-term constraints on economic viability. Tin summary, the site is not able to be used for land-based primary production and therefore there is no substantive effect in terms of its loss.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
			In response to the PCE comment, the SOE of Mr Kyle and Ms Hankey concludes that the effect is minor.
While the applicant has provided snips from the national maps (e.g. soil order classifications), they did not undertake up-to-date, detailed, high-resolution and high-quality property-scale mapping of the land and its characteristics. <i>p.1</i>	Land	Part B.01 – Land assessment, page 8 Legal Submissions, Section 3	The reasons that the applicant has not provided detailed mapping and have relied on the LUC classification are explained in the legal submissions.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Advances in geospatial technology now provide these capabilities, and they can materially support land management and environmental regulation. High-resolution and high-quality mapping might reveal that the site, or a part of the site, is not considered highly productive. It is certainly likely to reveal heterogeneity, which might enable the applicant to consider adjusting the footprint to avoid, or at least minimise, the loss of highly productive land. With this in mind, the panel might consider requesting that the applicant undertake such mapping of the site. Note that these matters are complicated by the 2024 Environmental Court decision that LUC classes cannot be challenged by applicants during the transition period. <i>p. 1-2</i>	Land	Part B.01 – Land assessment Legal Submissions, Section 3	Refer response in row above.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
The loss of highly productive land cannot be appropriately addressed by conditions (unlike flood hazards or ecological effects) and the panel must be satisfied that the benefits are proportionate to this permanent cost. p.2	Land	Legal Submissions, Section 3	As explained in the legal memorandum / submissions, the loss of HPL is one potential impact to take into account under s 81 of the FTAA. The Panel must still apply s 85 of the FTAA and may only refuse the consent where the impacts are 'sufficiently significant to be out of proportion to the project's regional or national benefits'. The purpose of the FTAA is to be given the greatest weight.
Fish and Game Otago			
Agree with overall ecological value of Silverstream in the reach adjacent to the site being "high". However, notes that the ecological function of the Silverstream for providing spawning, incubation and juvenile rearing habitat for the lower Taieri brown trout (<i>Salmo trutta</i>) fishery is not fully explored. <i>Section: Affected Hunting and Fishing Values, Paragraph 6</i>	Freshwater Ecology	Part A.02A - Southern Link Inland Port - Substantive Application, Sections 6.4.7 & 6.7.1 Part B.04 - Freshwater Ecology Impact Assessment, pages 27 – 30 Attachment 15 SOE of Dr R Allibone, Section 3	This is addressed in Section 3 in the SOE of Dr Allibone.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
The Silverstream is the main recruitment source for the Taieri fishery below Outram. This recruitment is critical as other spawning reaches that could support the lower Taieri fishery are limited, either in extent or by physical characteristics and/or degradation of those waters. In contrast, the Silverstream provides highly accessible habitat and records some of the highest spawning numbers and redd densities in the Taieri catchment. <i>Section: Affected Hunting and Fishing Values, Paragraph 11</i>	Freshwater Ecology	Part A.02A - Southern Link Inland Port - Substantive Application, Sections 6.4.7 & 6.7.1 Part B.04 - Freshwater Ecology Impact Assessment, pages 27 – 30 Attachment 15 SOE of Dr R Allibone, section 3	This is addressed in Section 3 in the SOE of Dr Allibone.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
For the Silverstream to continue providing the critical function of providing substantial recruitment for the lower Taieri Fishery, the water body will need to retain largely sediment-free spawning gravels and suitable water quality. Guidelines for achieving this are set out later in these comments. <i>Section: Affected Hunting and Fishing Values, Paragraph 14</i>	Freshwater Ecology	Part A.02 – Substantive Application, Sections 6.4, 6.7, 6.10.2 & 6.11 Part B.13 – Stormwater Assessment, pages 2, 4, 15, 17, 32 – 33, 35, 37 & 39 Part B.04 – Freshwater Ecological Impact Assessment, pages 33 – 43. Attachment 15 SOE of Dr Allibone, Section 3 Part C.01 - Proposed Conditions – Dunedin City Council	Sediment control for the SLIP Project is extensively described through the application documents. These matters will also be addressed in the Erosion and Sediment Control Plan (DCC Condition 21). Matters referring to spawning gravels and suitable water quality, are addressed in Section 3 in the SOE of Dr Allibone.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Putting the application assessment of Silverstream values together with the fishery values, the Silverstream is a critical spawning stream supporting a regionally significant fishery with very high angler use. The characteristics of the Silverstream which support these functions are in relatively good health; although, some are showing signs of stress. These characteristics are recognised and directed to be protected by the RPW. <i>Section: Affected Hunting and Fishing Values, Paragraph 16</i>	Freshwater Ecology	Part A.02A - Southern Link Inland Port - Substantive Application, Sections 6.4.7 & 6.7.1 Part B.04 - Freshwater Ecology Impact Assessment, pages 27 – 30 Attachment 15 SOE of Dr Allibone, Section 3	This is addressed in Section 3 in the SOE of Dr Allibone.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
The SLIP development has the potential to degrade the Silverstream and worsen the cumulate effects that are already felt through the discharge of contaminants and works in the water body. The decade long construction and earthworks phase is of particular concern as sediment discharges can quickly smother redds and make spawning gravels unsuitable for brown trout. <i>Section: Affected Hunting and Fishing Values, Paragraph 17</i>	Freshwater Ecology	Part A.02 – Southern Substantive Application, Sections 6.4, 6.7, 6.10.2 & 6.11 Part B.13 – Stormwater Assessment, pages 2, 4, 15, 17, 32 – 33, 35, 37 & 39 Part B.04 – Freshwater Ecological Impact Assessment, pages 33 – 43 Attachment 13 SOE of Ms Miller, Section 3 Attachment 15 SOE of Dr Allibone, Section 3	Sediment control for the SLIP Project is extensively described through the application documents. These matters will also be addressed in the Erosion and Sediment Control Plan (DCC Condition 21). Degradation of instream habitat quality is addressed in Section 3 in the SOE of Ms Miller. Matters referring to spawning habitats are addressed in Section 3 in the SOE of Dr Allibone.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
In addition to its function as a spawning, incubation and juvenile rearing stream, the Silverstream provides angling opportunities which are taken up by a relative few. The NAS estimated that 196 ± 157 angler-days' worth of effort were expended on the stream in the 2021/2022 season. It is likely that this stream is servicing Mosgiel residents – potentially juniors who cannot travel longer distances of their own accord. While the user numbers are not large, these types of local fishing opportunities are often very important to those who rely upon them and should be considered. <i>Section: Affected Hunting and Fishing Values, Paragraph 18</i>	Freshwater Ecology	Attachment 15 SOE of Dr Allibone, Section 3	This is addressed in Section 3 in the SOE of Dr Allibone.
Fish and Game recommend that the full sensitive period – from upstream migration to fry emergence – is used when assessing the impacts the application, rather than the spawning only timeframes given in Table 9 of B.04.	Freshwater Ecology	Part A.02A - Southern Link Inland Port - Substantive Application, Sections 6.4.7 & 6.7.1 Part B.04 - Freshwater Ecology Impact	Imposing restrictions on any instream works between May – October is overly cautious and not considered necessary for the SLIP Project. ORC Condition C.15 has been amended to prevent any construction in the wetted bed of the Silver Stream from 15



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Fish and Game's experience is that there is a fair degree of uncertainty about the timing of these periods, as surveys to establish spawning are often focused on its geographical bounds rather than pinpointing timing. Most estimates suggest a range of upstream migration dates from the start of March until the start of May, with a peak around May – July. The end of October is often the date used for the point at which fry emergence has generally finished and is often less disputed in Fish and Game's experience. The sensitive period (adapted from NIWA's Freshwater Fish Spawning and Migrations Periods report) is longer than what SLIP has identified in the application, however, restrictions in the proposed conditions cover the majority of the sensitive life cycle period for brown trout. <i>Section: Affected Hunting and Fishing Values, Paragraph 20-2</i>		Assessment, pages 27 – 30 Part C.02 - Proposed Conditions – Otago Regional Council Attachment 15 SOE of Dr Allibone, Section 3	May – 15 September to ensure the protection of brown trout spawning.

Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
The application meets many, but not all, of the guidelines set out by the Cawthorn Institute for optimal conditions for trout populations. Additional baseline monitoring work would likely assist in improving the understanding for some of the parameters. It is noted that spawning and incubation is still occurring despite not achieving all of the guidelines in the Silverstream. Not achieving a sub-set of these guidelines should not be taken as a reason to enable the degradation of water quality for others. Fish and Game recommends that the trout spawning and incubation guidelines are applied during the sensitive period in trout lifecycles and the other significant trout fisheries are applied for the remainder of the year. Doing so will provide for brown trout spawning, incubation and juvenile recruitment, as well as the small amount of fishing that takes place on the water body. <i>Section: Affected Hunting and Fishing Values, Paragraphs 23-26</i>	Freshwater Ecology	Part C.02 - Proposed Conditions – Otago Regional Council Attachment 15 SOE of Dr Allibone, Section 3 Attachment 13 SOE of Ms Miller, Section 3	This is addressed in Section 3 in the SOE of Dr Allibone and in Section 3 the SOE of Ms Miller. ORC Conditions B.22 – B.37 set out the process for assessing the baseline dataset and setting the site-specific trigger limits. The conditions also require the identification of monitoring triggers and response and management measures, and these will not change prior to certification.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
In the context of the Silverstream, where the water body has high values but is negatively impacted primarily due to rural and urban discharges as well as historical straightening and alterations to accommodate flood protection schemes, the RPW direction requires a long-term resolution to issues such that the water body is in a state of good health by 2050. The SLIP application is just one part of the larger systems which will be involved in achieving this direction. Fish and Game submit that, if granted, the SLIP approvals should direct that the project be able to support this effort. This will require the project to have limits which will be appropriate for the water body in a state of good health. <i>Section: Fish and Game's approach to managing habitat and Te Mana o te Wai, Paragraphs 34-35</i>	Freshwater Ecology Planning	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.7 & 9.3.11 Part B.04 – Freshwater Ecological Impact Assessment, page 14 – 30 Attachment 5 SOE of Mr Kyle and Ms Hankey, Section 5 Attachment 14 SOE of Mr Bloomberg, Section 3	This is addressed in Section 3 in the SOE of Mr Bloomberg and Section 5 of the SOE of Mr Kyle and Ms Hankey.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
In discussions with the applicant, Fish and Game staff have been told that the object is to maintain water quality, which is to say not to make things worse. However, the proposed system is not adequately developed and may result in further degradation, which is inconsistent with that objective and that of relevant planning documents. <i>Section: Issues – Stormwater discharge quality, guidelines and trigger values, Paragraph 42</i>	Freshwater Ecology Planning	Part A.02A - Southern Link Inland Port - Substantive Application, Sections 6.11 & 9 Attachment 5 SOE of Mr Kyle and Ms Hankey, Section 5 Attachment 14 SOE of Mr Bloomberg, Section 3	This is addressed in Section 3 in the SOE of Mr Bloomberg and Section 5 of the SOE of Mr Kyle and Ms Hankey.
Concern regarding uncertainty for stormwater management as the baseline modification factor (and therefore final trigger limits) are unknown. <i>Section: Issues – Stormwater discharge quality, guidelines and trigger values, Paragraph 42 (a)</i>	Freshwater Ecology Stormwater	Part A.02A - Southern Link Inland Port - Substantive Application, Section 6.11 Attachment 9 SOE of Dr Conwell, Section 2 Attachment 14 SOE of Mr Bloomberg, Section 3	This is addressed in Section 2 in the SOE of Dr Conwell and Section 3 of the SOE of Mr Bloomberg.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concern as the proposed consent conditions do not set limits or expected outcomes, other than those for freshwater discharges in relation to the RMA s107 style language – which are minimum requirements and will not provide adequate protection to the values of the Silverstream from the stormwater discharge. Concern that as the Stormwater Monitoring Plan can be finalised at a later date and may be amended, it may be materially different to what is proposed currently. <i>Section: Issues – Stormwater discharge quality, guidelines and trigger values, Paragraph 42 (b)</i>	Freshwater Ecology Stormwater	Part C.02 - Proposed Conditions – Otago Regional Council	ORC Conditions B.22 – B.37 set out the process for assessing the baseline dataset and setting the site-specific trigger limits. The conditions also include the trigger and responses, and these will not change prior to certification.

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The application does not justify the 10% buffer for the downstream trigger limit. This trigger limit is a mechanism that enables a discharge rather than ensures the health of the water body and is not an approach consistent with the LF-WAI provisions of the RPS or the concept of TMOTW. Fish and Game Otago point to the Australian & New Zealand Guidelines for Freshwater and Marine Water Quality (ANZG) for guidance on accounting for local conditions. Recommend the final triggers will be assessed against the values of the Silverstream in the future as the impacts of the modifications are currently unknown. <i>Section: Issues – Stormwater discharge quality, guidelines and trigger values, Paragraph 42 (c)</i>	Freshwater Ecology	Attachment 14 SOE of Mr Bloomberg, Section 2	This is addressed in Section 2 of the SOE of Mr Bloomberg.

Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concern that the baseline is not robustly established, especially as the ANZG recommends at least two years of monthly monitoring data as required for an adequate baseline. <i>Section: Issues – Stormwater discharge quality, guidelines and trigger values, Paragraph 42</i>	Freshwater Ecology	Part A.02A - Southern Link Inland Port - Substantive Application, Sections 6.7.1 Part B.04 – Freshwater Ecological Impact Assessment, pages iv – v, 10, 13, 19, 31 – 37, 41 – 42 Part B.13 – Stormwater Assessment, page 32 Attachment 14 SOE of Mr Bloomberg, Section 2	This is addressed in Section 2 of the SOE of Mr Bloomberg.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concern that the proposed guideline and trigger values will not protect fishery values as: > Water clarity is not addressed; and > Periphyton biomass / cover and the MCI is only monitored annually, making it very difficult to respond meaningfully to changes. Deposited sediment would also be monitored annually but the Cawthron authors suggest this may not be problematic, if clarity and MCI are adequately addressed. <i>Section: Issues – Stormwater discharge quality, guidelines and trigger values, Paragraph 42</i>	Freshwater Ecology	Part B.04 – Freshwater Ecological Impact Assessment, pages iii, 18 -19, 33 & 35 Part C.02 - Proposed Conditions – Otago Regional Council e3Scientific Memorandum - Stormwater Monitoring Plan, page 16 Attachment 14 SOE of Mr Bloomberg, Section 3 Attachment 13 SOE of Ms Miller, Section 2	This is addressed in Section 3 of the SOE of Mr Bloomberg and Section 3 of the SOE of Ms Miller. The proposed temperature limits are provided for through the Stormwater Monitoring Plan framework. The other water quality parameters and limits raised by the submitter are already addressed in Table 2 of the SMP. Conditions B.20-B.23 set out the requirements for the preparation, certification, implementation, and review of the Stormwater Monitoring Plan.

Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Concern as parameters are excluded due to their detection limits. The e3 memo forewarns that the laboratory detection limit for dissolved copper and zinc approaches the 99% guideline value for acute and chronic toxicity and as a result, may not be suitable for adoption. Fish and Game submit that it is suitable to continue monitoring in this situation, with the presence of the parameter above the detectable limit indicating a problem that should be investigated. <i>Section: Issues – Stormwater discharge quality, guidelines and trigger values, Paragraph 42</i>	Freshwater Ecology	Attachment 14 SOE of Mr Bloomberg, Section 3	This is addressed in Section 3 of the SOE of Mr Bloomberg.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Fish and Game Otago submit that a fundamental issue with the application is that the impact of stormwater discharges cannot yet be determined (reasons described above) and that this uncertainty detracts from the national and regional benefits of the project. They recommend requiring the Stormwater Management Plan to achieve the guidelines described above and that there is to be no measurable difference where the upstream monitoring site already does not meet those guidelines – as would be consistent with the RPS LF-WAI and TMOTW approach. <i>Section: Issues – Stormwater discharge quality, guidelines and trigger values, Paragraphs 44-45</i>	Stormwater Freshwater Ecology	Part B.04 – Freshwater Ecological Impact Assessment, pages iv – v, 10, 13, 19, 31 – 37, 41 – 42 Part B.13 – Stormwater Assessment, page 32 Part C.02 - Proposed Conditions – Otago Regional Council Attachment 14 SOE of Mr Bloomberg, Section 3	This is addressed in Section 3 of the SOE of Mr Bloomberg. ORC Conditions B.22 – 37 establish a comprehensive monitoring and adaptive management framework to ensure that stormwater discharges from the Project do not adversely affect the water quality, ecology, or cultural values of Silver Stream during construction and operation.
The proposed stormwater monitoring plan does not adequately prevent the discharge of sediment to the Silverstream. Deposited sediment is monitored quarterly via NTU guidelines – set with a maximum over 20x the recommended limit to protect fisheries values – and annually via ecological monitoring. Both can trigger additional testing of sediment quality; although, this is less helpful to protect trout spawning	Stormwater Freshwater Ecology	Part C.01 - Proposed Conditions - Dunedin City Council Part C.02 - Proposed Conditions – Otago Regional Council	This is addressed in Section 3 of the SOE of Mr Bloomberg. ORC Conditions B.12 – 21 establish the framework for the collection, treatment, attenuation, and discharge of operational stormwater from the Project, while ensuring that downstream water quality, stream stability, and flood risk are appropriately managed.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
and incubation which can be smothered by deposited sediment quickly. The timeframes for this monitoring programme is not suitable for catching the discharge of sediment during rainfall events, which can happen multiple times a month. The actions triggered by these monitoring events are slow and rely heavily on report writing and investigation. This is unsuitable as what is required to address pulses of sediment discharge is immediate action to capture and dispose of silt laden water before it reaches the water body and alterations to the stormwater system and/or earthworks to ensure that such discharge does not occur again. <i>Section: Issues – Stormwater discharge quality, Pulses of sediment during the construction phase, Paragraphs 49-50</i>		Attachment 14 SOE of Mr Bloomberg, Section 3	Refer to above point for the purpose of the ORC Conditions B.22 – 37.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Fish and Game recommends a consent condition be added to the ORC suite of consents to require a regular inspection of the discharge during large rain events. If the water is turbid, then the application should be directed to take steps to stop the discharge and address the issue within a short timeframe. <i>Section: Issues – Stormwater discharge quality, Pulses of sediment during the construction phase, Paragraph\ 51</i>	Freshwater Ecology	Part C.02 - Proposed Conditions – Otago Regional Council Attachment 14 SOE of Mr Bloomberg, Section 3	This is addressed in Section 3 of the SOE of Mr Bloomberg. Refer to above point for the purpose of the ORC Conditions B.22 – 37.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
The applicant has proposed a regime whereby work can occur within the wetted bed of the Silverstream between the start of May and the start of November provided that it undertakes a spawning survey prior to identify whether there are any redds present and delay the work until the next flood. A hard limit on the discharge of sediment is proposed for such work, being no more than would create a conspicuous change in colour or clarity within 20 meters of the site, which is likely to be reasonably protective. Fish and Game identify a number of concerns: > Redds become difficult to see a couple of weeks after they are cut; > A small flood can remove the shape of a redd; and > Not all floods damage redds and a size of a “trigger flood” would need to be established. <i>Section: Issues – Stormwater discharge quality, Working in the Silverstream during sensitive life stages for trout, Paragraphs 54-56</i>	Freshwater Ecology	Part B.04 – Freshwater Ecological Impact Assessment, pages iv, 27 – 28, 34 – 35 & 41 Part C.02 - Proposed Conditions – Otago Regional Council Attachment 15 SOE of Dr Allibone, Section 3	This is addressed in Section 3 of the SOE of Dr Allibone. ORC Condition C.15 has been amended to prevent any construction in the wetted bed of the Silver Stream from 15 May – 15 September to ensure the protection of brown trout spawning.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Fish and Game has discussed these concerns with the applicant, who has agreed to re-investigate whether work need be done in the wetted bed of the Silverstream at all from the start of May until the start of November. While this doesn't cover the entire sensitive period, Fish and Game would accept this as a pragmatic compromise. <i>Section: Issues – Stormwater discharge quality, Working in the Silverstream during sensitive life stages for trout, Paragraph 57</i>	Freshwater Ecology	Part A.02A - Southern Link Inland Port - Substantive Application, Section 3.16.2 Part B.04 - Freshwater Ecological Impact Assessment, page 28, 34, 39 & 41 Part C.02 - Proposed Conditions – Otago Regional Council	Imposing restrictions on any instream works between May – October is overly cautious and not considered necessary for the SLIP Project. As detailed above, ORC Condition C.15 has been amended to prevent any construction in the wetted bed of the Silver Stream from 15 May – 15 September.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Fish and Game recommend that no work be done in the wetted bed of the Silverstream between the start of May and the start of November. Otherwise, a more robust redd identification methodology will be required, along with a clear definition of a flood which will guarantee the destruction of redds. For the former, Fish and Game has in the past had success using fortnightly spawning surveys to reliably identify whether spawning has occurred in a particular reach. This would involve a suitably trained person walking the bank of the proposed work site each fortnight and recording any redds that are seen. Provided the flood definition were able to be resolved, this approach may present a backstop if work in the Silverstream cannot be avoided. <i>Section: Issues – Stormwater discharge quality, Working in the Silverstream during sensitive life stages for trout, Paragraphs 58-60</i>	Freshwater Ecology Condition	Part A.02A - Southern Link Inland Port - Substantive Application, Section 3.16.2 Part B.04 - Freshwater Ecological Impact Assessment, page 28, 34, 39 & 41	Refer to above response.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
Fish and Game provides examples of Bullock Creek and Alpha Series that highlight the importance of robust design and clear compliance regimes for stormwater systems as a part of large developments. They state the SLIP application risks similar outcomes to the examples as: > The consent conditions for stormwater discharge have very few freshwater limits or clear statements of outcomes that are to be achieved for the Silverstream, instead relying on future plans which can use guideline values and triggers which differ from those which are listed in the e3 memo; > Enforcement actions relying on conditions using the s107 style language are often difficult to enforce as they often rely on expert assessment to demonstrate a breach; and > It is possible that the applicant will not be required to respond quickly to address serious and frequent discharges.	Freshwater Ecology	Part A.02 – Substantive Application, Sections 6.4, 6.7, 6.10.2 & 6.11 Part B.13 – Stormwater Assessment Part B.04 – Freshwater Ecological Impact Assessment Attachment 14 SOE of Mr Bloomberg, Section 3	This is addressed in Section 3 of the SOE of Mr Bloomberg.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
<i>Section: Issues – Stormwater discharge quality, Working in the Silverstream during sensitive life stages for trout, Paragraphs 69-70</i>			
Fish and Game is supportive of the application, provided that the below issues are resolved: a. The Stormwater Management Plan achieve the guidelines detailed above in the <i>Guidelines to protect fishery values on the Silverstream</i> section of these comments, and to have no measurable difference where the upstream monitoring site already does not meet those guidelines: i. the spawning and incubation guidelines during the sensitive life-cycle period, as described in Table 3: Water quality guidelines intended to maintain near optimal conditions for trout spawning and incubation in streams managed for spawning ; and ii. the ‘other significant fisheries’ guidelines outside of the sensitive lifecycle period, as described in paragraph 26.	Freshwater Ecology		SLPL appreciates the Fish and Game’s support for the SLIP Project. These points have all be addressed above.



Comment	Applicant Technical Input	Where Addressed in the Application Documents / Response	Response
b. A consent condition be added to the ORC suite of consents to require a regular inspection of the discharge during large rain events. If the water is turbid, then the application should be directed to take steps to stop the discharge and address the issue within a short timeframe. c. The consent conditions are amended so that work cannot be undertaken in the wetted bed of the Silverstream between the start of May and the start of November. <i>Section: Summary and recommendations, Paragraph 75</i>			

