



Cindy Robinson

Southern Link Inland Port Expert Panel Chair
Environmental Protection Authority
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Sent by email: substantive@fasttrack.govt.nz

12 August 2026

Dear Cindy Robinson,

RE: Invitation to Comment Southern Link Inland Port [FTAA-2604-1207]

Thank you for the opportunity to comment on the Southern Link Inland Port (SLIP) project currently under the expert panel's consideration.

My comments focus on the permanent loss of highly productive land this project would entail, specifically land with Pallic soils, also classified as Land Use Capability (LUC) 1 land. The applicant has argued that the constraints on the use of this land for economically viable productive purposes are significant enough that the proposed development may meet the exemption criteria under clause 3.10 of the National Policy Statement for Highly Productive Land (NPS-HPL).

I refer the panel to my review of the LUC system, which found that the system lacks sufficient robustness for regulatory decision-making, owing largely to its use of information that lacks detail and is outdated.¹ In particular, the national New Zealand Land Resource Inventory (NZLRI) LUC dataset, which is the default dataset in the NPS-HPL for identifying highly productive land, is inappropriate for use at a property scale.

The applicant's land assessment sets out what appear to be reasonable constraints.² 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.³ In my view, this is the key issue the panel will need to determine.

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. Advances in geospatial

¹ PCE, 2025. Reviewing the use of the LUC system in a regulatory context. <https://pce.parliament.nz/media/hmbjgw3u/reviewing-the-use-of-the-luc-system-in-a-regulatory-context-9122025.pdf>

² Southern Link Property Limited, 2026. Land Assessment, prepared by Abacus Bio Limited. https://www.fasttrack.govt.nz/data/assets/pdf_file/0013/26302/Part-B.01-AbacusBio-Land-Assessment-April_Redacted.pdf

³ Southern Link Property Limited, 2026. Southern Link Inland Port – Substantive Application Report, p.172. https://www.fasttrack.govt.nz/data/assets/pdf_file/0022/29326/Part-A.02A-SLPL-Southern-Link-Inland-Port-Substantive-Application-Report-Clean-Version.pdf

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.

While, in my view, any definition of highly productive land should be based on detailed, high-quality and high-resolution mapping, it is worth noting that a 2024 Environment Court decision complicated matters somewhat. The decision clarified that in the transition period, applicants in consenting processes could not challenge the LUC classes of their land as mapped in the NZLRI database, even if more detailed individual site investigations conclude that land is not considered LUC 1, 2 or 3.⁴ This may mean that rural-zoned land that is mapped as LUC 1, 2 or 3 in the NZLRI is 'stuck' as highly productive land until regional councils introduce changes to their regional policy statements, which are currently on hold due to the ongoing resource management reform.

Flood hazards (both for the project and for the surrounding area due to the increased impermeable surface area the SLIP would create), ecological effects and other areas of concern can likely be appropriately addressed by conditions. The loss of highly productive land cannot be, and the panel must be satisfied that the benefits are proportionate to this permanent cost.

Yours sincerely



Rt Hon Simon Upton
Parliamentary Commissioner for the Environment
Te Kaitiaki Taiao a Te Whare Pāremata

⁴ The transition period means until regional councils notify changes to their regional policy statements to include maps of highly productive land. *Blue Grass Limited v Dunedin City Council* [2024] NZEnvC 83.