

Before the Expert Panel appointed under the
Fast-track Approvals Act 2024

FTAA-2604-1207

Under	the Fast-track Approvals Act 2024
In the matter	of the Southern Link Inland Port
By	Southern Link Property Limited

**MEMORANDUM OF COUNSEL ON BEHALF OF SOUTHERN LINK PROPERTY
LIMITED IN RESPONSE TO MINUTE 9**

27 August 2026



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MAY IT PLEASE THE PANEL

1. This memorandum is filed on behalf of the applicant, Southern Link Property Limited (**SLPL**) in response to Minute 9 of the Panel.
2. Minute 9 of the Panel directs that a Joint Witness Statement on Transport matters be produced by 3 September, and a hearing (if required) is scheduled for 8 September. Under the Transportation Issues sub-heading, paragraph [5] of the Minute states: “If any expert considers that an item sought by this Minute cannot be delivered within the timetable, the Panel asks that this be identified by 5pm 27 August 2026.”
3. The transport expert for SLPL has reviewed the questions and issues set out in Annexure A of Minute 9. Some of the questions are principally information requests that require input from SLPL. While preparing that information commenced after Minute 9 was received, given the breadth and complexity of the matters raised, and the additional analysis that will be required before conferencing can properly commence between the experts, SLPL’s transport experts consider that the JWS cannot be completed by the current deadline of 3 September 2026.
4. SLPL has consulted with DCC and NZTA who have both confirmed their agreement that a short extension would be appropriate given the breadth and length of the Panel’s Minute. Collectively the various transport experts also have other commitments across Friday, and Monday to Wednesday of next week.
5. SLPL accordingly requests that the Panel:
 - (a) extend the date for completion of the Transport JWS to **8 September 2026**; and
 - (b) adjusts the hearing timetable for the transport hearing to the week of **14 September 2026** to align with the noise and freshwater issues hearings scheduled for 14 and 15 September

2026. More specifically, the transport hearing be scheduled for the morning of **14 September 2026**, before the noise hearing (both online). All references in this direction to hearings should be read as only going ahead if required.

6. SLPL, DCC and NZTA experts have all confirmed they are available on the morning of 14 September 2026.
7. It is respectfully submitted that the additional three working days will allow SLPL sufficient time to collate and provide necessary information to the relevant experts, and for the traffic experts / traffic planners to undertake the further analysis contemplated by the Panel's questions, confer meaningfully on that analysis, and produce a JWS that properly assists the Panel, with the aim that a hearing is not ultimately required.
8. SLPL records that it has also taken into account the comments in the Minute that acoustic experts will need to see the final transport JWS. The proposed timing gives two working days between the transport and noise JWS being finalised and lodged.
9. It also appears quite reasonable that a hearing on traffic and noise matters will be able to be heard in one day.

Dated: 27 August 2026



S J Scott
Counsel for Southern Link Property Limited