

MEMORANDUM OF THE NEW ZEALAND TRANSPORT AGENCY ON THE SOUTHERN LINK INLAND PORT PROJECT

11 August 2026

1 Introduction

- 1.1 This memorandum presents the assessment undertaken by the New Zealand Transport Agency Waka Kotahi (**NZTA**) of the substantive application (**Application**) for the Southern Link Inland Port project (**SLIP, the proposed development**) (NZTA reference 2025-0756), submitted by Southern Link Property Limited (**SLPL**) under the Fast Track Approvals Act 2024 (**FTAA**).
- 1.2 NZTA appreciates the opportunity to comment on the Application.
- 1.3 The assessment has been prepared in response to an invitation from the Expert Panel (**the Panel**) to provide comment and includes a summary of preliminary findings relating to transportation considerations as they relate to the state highway network.
- 1.4 This assessment is based on the Application materials submitted to the Environmental Protection Agency (**EPA**).
- 1.5 NZTA has drawn on input from qualified and experienced internal staff when putting together its comments. Specifically, input was sought from:
 - Roy Johnston: Principal Safety Engineer based in the NZTA Dunedin Regional Office. Roy has been employed by NZTA for 19 years and holds a Diploma in Engineering (Level 6) (Civil) from Otago Polytechnic.
 - Kelly Blackie: Principal Transport Planner based in the NZTA Regional Office. Kelly has 20 years experience in transport planning and engineering across consulting and government roles and has completed a Diploma in Engineering (Level 6) (Civil) from Otago Polytechnic. She holds the post nominals CMEngNZ (Eng. Technician) with Engineering NZ, is a Professional Development Scheme mentor with the Transport Planning Society and is working towards the Chartered Transport Planning Professional accreditation.
 - Helen Dempster: Principal Planner based in the NZTA Dunedin Regional Office. Helen has been employed by NZTA in their Environmental Planning team, since 2020. Helen holds the qualification of Bachelor of Science with Honours (First Class) from the University of Otago.

2 Assessment of proposal on NZTA's network and assets

- 2.1 NZTA's interest in the Application is confined to the robustness of the technical reports submitted and to ensure that transport effects as they relate to the state highway network are adequately managed.
- 2.2 NZTA wishes to comment on the development's impact on State Highway 87 (**SH87**) and State Highway 1 (**SH1**).
- 2.3 NZTA has reviewed the Integrated Transport Assessment (**ITA**) provided in the Application, as well as the ITA Addendum (**Addendum**) provided by SLPL in response to Minute 4 of the Panel, and wishes to provide the following comments.
- 2.4 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.
- 2.5 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. 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.
- 2.6 At Stage 2 and 3 of the proposed development, independent businesses are expected to be operate within the inland port. NZTA assume that SLPL do not currently know who the tenants will be, and that is why SLPL has used similar HCV generation rates and patterns to its existing operation involving Dynes and Icon. The ITA does not address what the impact of route choice may be based on different distribution patterns potentially used by future tenants. For example, if

more freight were to come from southern locations, crossing over SH87 onto Dukes Road North. 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.

- 2.7 Light vehicle numbers are identified at 310 vehicle movements per day at full development of the SLIP. The information SLPL have provided 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. To this end, NZTA requests that the Panel ask SLPL to provide further information on the expected traffic impacts associated with anticipated staff light vehicle movements, and for this information to be provided to NZTA for further comment.
- 2.8 In an early pre-Application communication with NZTA, SLPL representatives indicated that Central Otago and north of Dunedin are anticipated growth areas for container movements. These growth areas are not mentioned in their 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. For this reason, 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.
- 2.9 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 of focus being: SH1 southbound offramp; SH87 Quarry Road roundabout; SH87 Gordon Road / Haggart–Alexander Drive; SH87 Gordon Road / Gladstone Road; and SH1 / Riccarton Road. 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.
- 2.10 Any upgrade to the intersection referred to in paragraph 2.4 above, and any further improvements to the state highway network that may be subsequently identified as necessary through this FTAA

process, is subject to NZTA approval of detailed design drawings of the proposed intersection upgrade and any other highway improvements identified as necessary to mitigate the traffic impacts of the proposed development. 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. Final design drawings are to include detail regarding pavement and surfacing design, lighting and stormwater management. Stormwater discharge must be demonstrated to not adversely affect the state highway.

- 2.11 We note that it is stated in Section 4.1.1.1 of the ITA Addendum that NZTA previously advised SLPL that no improvements to the highway are necessary. At the request of SLPL, NZTA staff attended a pre-application meeting with SLPL representatives and, based on the indicative HCV numbers provided by SLPL indicated that there appeared to be very few drivers for any highway upgrades. Those informal, preliminary comments by NZTA were based on indicative, pre-Application data, and NZTA takes the view that any previously provided preliminary feedback given to SLPL does not foreclose our ability to take a different position now based upon the information provided in the Application. As per our comments in paragraph 2.4 above, we now consider an upgrade to the existing right turn bay on SH87 is necessary to mitigate the traffic effects associated with the proposed development.

3 Conclusion

- 3.1 NZTA has identified areas (paragraphs 2.5, 2.6 and 2.7) where further information is required to understand the effects of the Application on the state highway network. NZTA seeks that the Panel requests further information from SLPL on these points and directs them to continue engagement with NZTA on these points.
- 3.2 NZTA has identified aspects of the proposed development which we suggest should be managed through conditions of consent (paragraphs 2.4 and 2.8).