

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 SLPL RESPONDING TO COMMENT
OF THE MINISTER FOR ECONOMIC GROWTH**

31 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**) under s 55 of the Fast-track Approvals Act 2024 (**FTAA**) in response to the s 53 comment of the Minister of Economic Development. The comment was received 'out of time' and the Expert Panel has given SLPL an opportunity to respond to this comment through directions included in Minute 9.
2. SLPL acknowledges the supportive comment from the Minister of Economic Growth, Hon Nicola Willis (**Minister Willis**), which focuses on whether the application is likely to deliver economic benefits. Minister Willis concludes that the proposal appears likely to deliver significant regional economic benefits under s 22(2)(a)(iv) of the FTAA, particularly through the scale of construction activity, employment generation, and potential improvements to freight and logistics infrastructure.
3. Minister Willis' comment in respect of economic benefits is important and directly relevant to the Panel's decision making on the approvals sought under s 81(4) and s85(3) of the FTAA. When deciding on the RMA approvals being sought, the Panel must, when taking the purpose of the FTAA into account, also consider the extent of the project's regional or national benefits. That includes the economic benefits identified by Minister Willis.

Construction economic benefits identified by Minister

4. The Minister's comment refers to:
 - (a) the construction expenditure of approximately \$213m over the 10-year development period; and
 - (b) generation of approximately \$191.3m in total value-added GDP (direct, indirect and induced impacts, expressed in 2020-dollar terms over the same development period.

5. This has a net present value of approximately \$147.8m when future impacts are discounted. The Minister also points to construction activity supporting approximately 1,489 FTE-years across the development period, equivalent to a simple annualised average of 149 FTEs per year.

Operational economic benefits identified by Minister

6. Minister Willis also recognises that on-going operational activity of the SLIP will support approximately 125 FTE positions, with approximately 104 net additional jobs in Dunedin in the short to medium term.
7. Ms Hampson has considered the comment from Minister Willis that her Economic Report does not quantify ongoing GDP, annual revenue, or wages and salaries associated with operational activity. She responds as follows:

The Minister for Economic Growth is correct that while net additional direct employment impacts have been quantified for the Project for the short-medium term, ongoing operational revenue, value-added GDP, and indirect and induced employment of the SLIP has not been quantified. This was stated in the Economic Assessment on page 3 and again on page 76. As alluded to there, Stage 1 of the Project represents a consolidation of existing Port Otago and Icon Logistics activity. While that consolidation simultaneously resolves a range of serious economic constraints for both businesses (set out in Sections 3.3, 4.4 and 5.1 of the Economic Report) and drives the efficiency, productivity and resilience benefits for their import and export customers, it does not necessarily result in a material change of gross output for both firms during stage 1 operations. Consolidation equates to 'transfer' and on that basis, no change in each company's value-added contribution to the Dunedin and regional economy was assumed.

This was a deliberately conservative approach that avoided overstating the valued-added GDP and employment impacts of early Inland Port operations. However, net additional employment at the Inland Port is projected, and with that comes growth in revenue and wage and salary payments which

help drive direct GDP growth and flow-on economic spending. It is our position that the Inland Port will facilitate growth in economic activity over the medium and long-term, and that this will not be limited to the businesses operating on the site.

Overall response

8. The focus of the Minister's comment on economic benefits is neatly aligned with the purpose of the FTAA, which is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. For completeness, SLPL refers to the Savvy Report for a more comprehensive explanation and list of the benefits of the project, both economic and other benefits. Various Benefits are set out in the Application documents, including at Sections 1.2, 2.2 and 6.3 of the AEE document.
9. Minister Willis has agreed with the significant regional/lower South Island economic benefits set out in the application's Economic Assessment. This includes the economic efficiency, productivity and resilience benefits that will be achieved for export and import supply chains from the consolidation of Port Otago and Icon Logistics container trade activity at the strategically located Inland Port, and the mode shift that will be enabled. She also correctly identifies the significant economic impacts that can be expected from the construction of the Project, and the way that the Inland Port provides opportunities for growth of container trade activity in Otago Region over time through expanded warehousing and container handling and storage capacity.

10. SLPL supports the emphasis on the significant economic benefits of the Project, which are separate benefits to the transport related benefits of the Project, which have recently been referred to by the Panel in its Minute 9.¹

Dated: 31 August 2026

A handwritten signature in black ink that reads "Sarah J. Scott". The signature is written in a cursive, flowing style.

S J Scott
Counsel for Southern Link Property Limited

¹ Minute 9 at [3].