

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

FTAA-2604-1207

Under the Fast-track Approvals Act 2024 (FTAA)

In the matter of the Southern Link Inland Port

By Southern Link Property Limited

**STATEMENT OF EVIDENCE BY CHRIS ROSSITER
ON BEHALF OF SOUTHERN LINK PROPERTY LIMITED**

TRANSPORT

19 August 2026



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1. INTRODUCTION

1.1 My full name is Michael Christopher Rossiter. My qualifications and experience, and my role in the Southern Link Inland Port (**SLIP**) Project are set out in my Integrated Transport Assessment report dated 15 April 2026 (**ITA Report**) included in Part B.12 of the substantive application for the SLIP. I also prepared the Transport Addendum filed with the Expert Panel on 31 July 2026 (**Transport Addendum**).

1.2 I have been asked by Southern Link Property Limited (**SLPL**) to provide a response to specific matters within my areas of expertise contained in written comments on the SLPL application from persons invited by the Panel to comment under s 53 of the FTAA. I have prepared responses on transport related topics raised by the following organisations as follows:

- (a) Dunedin City Council (**DCC**):
 - (i) Entrance design
 - (ii) Dukes Road North formation
 - (iii) Dukes Road footpath
 - (iv) Internal site design
- (b) New Zealand Transport Agency (**NZTA**):
 - (i) SH87 / Dukes Road intersection improvements
 - (ii) Heavy vehicle route assignment
 - (iii) Heavy vehicle volumes
 - (iv) Staff travel
 - (v) Vehicle movement cap
- (c) Mosgiel-Taieri Community Board (**MTCB**):
 - (i) SH87 / Gordon Road
 - (ii) Alternate freight route
- (d) Te Rūnanga o Otākou Treaty Impact Assessment (**TIA**):
 - (i) Heavy vehicle volumes on Gordon Road
 - (ii) Road safety effects on Gordon Road
 - (iii) Road safety effects on Stedman Road and Wingatui Road

- (iv) Level Crossing Safety Impact Assessment
- (v) Mosgiel Freight Corridor
- (e) Craig and Joanne Inch
- (f) Jane and Bernie McLeod

Code of Conduct

1.3 I confirm that I have read the Code of Conduct for Expert Witnesses contained in section 9 of the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise, and I have not omitted material facts known to me that might alter or detract from my evidence.

2. DUNEDIN CITY COUNCIL

SLIP site entrance design

2.1 DCC¹ is seeking some clarification of the consent conditions relating to the design of the SLIP entrance on Dukes Road North. In my opinion, these are planning matters and I defer to the planning experts.

Dukes Road North formation upgrade

2.2 DCC has classified Dukes Road North as a Strategic Road in its 2nd Generation District Plan (**2GP**). This reflects its role connecting the Dukes Road Industrial Zone with State Highway 87 (**SH87**) at its southern limit and Three Mile Hill Road at its northern limit. Three Mile Hill Road is also classified as a Strategic Road and continues to the eastern side of Dunedin. Despite this classification, DCC does not consider that Dukes Road North east of Stedman Road has been formed to a standard that is suitable for heavy vehicle usage even though its formation is similar to the section of road east of SH87. On that basis, DCC² is seeking an upgrade to Dukes Road

1 DCC Comment on SLIP, paragraph 63 – bullet points 1, 4, 5, 7.

2 DCC Comment, Paragraph 63 – bullet point 2.

North along the SLIP frontage but does not specify what level of upgrade is being sought.

- 2.3** Between SH87 and the Industrial Zone, Dukes Road North has been formed to a rural road standard as a two-lane road with a 6.6 m sealed width, centre line and edge line. Within the 2GP Industrial Zone (Carncross Street to Stedman Road), Dukes Road North has a more urban formation with kerb and channel. The 11.6 m carriageway along this part of Dukes Road North allows for marking of right turn bays at the Enterprise Place and Sinclair Place intersections. Kerb side parking is permitted along sections of the road away from intersections.
- 2.4** East of Stedman Road, Dukes Road North has a rural character and a sealed carriageway width of 6.6m.
- 2.5** The speed limit on Dukes Road North is 80 km/h which typically is applied on rural roads and does not reflect the more urban character that is present where this road is located within the Industrial Zone (Carncross Street to Stedman Road). In my opinion, an urban speed limit (60 km/h or less) would be more appropriate for Dukes Road North between Carncross Road and Stedman Road which could extend along Dukes Road North to include the SLIP boundary if the SLIP is approved.
- 2.6** Although the Dukes Road Industrial Zone has been established since before the 2GP, DCC has only widened the carriageway within the Industrial Zone. No widening of the rural sections of Dukes Road North either east of Stedman Road or west of Carncross Road has been undertaken to align the road formation with the DCC design standards for new roads which are set out in the Dunedin Code of Subdivision and Development 2010. Under that standard, a rural road serving industrial activity requires a 5.5 to 5.7 m wide movement width with 1 m wide sealed shoulders. The road formation on the rural sections of Dukes Road North (including alongside the SLIP site) exceeds the movement width requirements (of 5.7 m) but do not meet the

sealed shoulder requirements. The formation of the road within the existing 2GP Industrial Zoned area does meet the design standards for a suburban road serving industrial activity that requires an 8.4 m wide road.

- 2.7** The SLPL application appropriately makes provision for widening of Dukes Road North to enable a right turn bay at the entrance to the site with sufficient stacking space for two High Productivity Motor Vehicles (**HPMV**) to be marked which represents appropriate mitigation of the effects on safety.
- 2.8** In terms of the rural section of Dukes Road North east of Stedman Road along to the entrance to the site referred to directly above, although the road does not fully align with current DCC road standards, I consider that the current traffic lane width is sufficient to meet the functional movement requirements of the 2GP Industrial Zone, as well as the additional movements that will be created by the SLIP.
- 2.9** In summary, in my opinion, the widening of the Dukes Road North carriageway between Stedman Road and the site entrance to align with Council standards is not required to accommodate the movement requirements of the SLIP as the lane widths already exceed the DCC requirements for a rural industrial road.
- 2.10** Based on the traffic count information collected by DCC in February 2026, the section of Dukes Road North between Puddle Alley and Stedman Road carried an average weekday volume of 1,980 vehicles per day (**vpd**). Following full development of the SLIP (Stages 1, 2 and 3), the average weekday traffic volume between the site entrance and Stedman Road could increase by about 500 vehicles per day. This broadly comprises 300 light vehicle movements and 200 heavy vehicle movements. This represents about 20% of the total volume on this section of road.
- 2.11** In summary, I consider that the existing formation of Dukes Road North east of Stedman provides sufficient width to accommodate two-way movement

of HPMVs and that widening is not necessary to accommodate the SLIP traffic for capacity reasons.

Dukes Road North – Footpath east of Stedman Road³

- 2.12** DCC is seeking the formation of a 2m wide foot path along the Dukes Road North Frontage connecting to the existing footpath on Stedman Road via a pedestrian crossing across the Taieri Branch Railway Line.
- 2.13** Figure 3-6 of the ITA Report shows that the existing pedestrian network within the Dukes Road North Industrial Zone is fragmented and largely incomplete. Stedman Road has a footpath on the western side of the road only between Dukes Road North and Odlins Place. There is no onward connection to Wingatui Road to the south and only a short section of path on Dukes Road North, west of Stedman Road. Currently, the location of the zone which is more than 1 km walking distance from the nearest large residential area means that pedestrian movement demands are very low. I understand that DCC is proposing to extend the pedestrian network and seeks that SLPL constructs a footpath along their Dukes Road North frontage to Stedman Road. The intention is to enable connection with the path on Stedman Road. I support the provision of a footpath along this section of Dukes Road North but note that construction of the path will be subject to third party approvals from Kiwirail because of the need for a new pedestrian railway level crossing.
- 2.14** I understand that SLPL has agreed to provide a footpath along its site frontage west of the main site access, along to where the SLIP property ends, but not across the Kiwirail owned land to completely connect with Stedman Road. I understand this issue is covered in the legal memorandum.

3 DCC Comment, paragraph 63 – bullet points 3 and 6.

Internal site design

- 2.15** I understand that the dimensions of the on-site parking exceeds the requirements of the DCC 2GP. On that basis, I support the alteration to the resource consent conditions sought by DCC to include a reference to the 2GP rather than NZS2890.1.
- 2.16** Since the shift change times will require employees to access car parks in night-time conditions, I agree with the DCC request for a lighting standard for the internal parking areas to be specified within the conditions of consent. I defer to the planners to agree the wording of the condition.

3. NEW ZEALAND TRANSPORT AGENCY

SH87 / Dukes Road Intersection

- 3.1** NZTA⁴ is seeking a condition of consent requiring SLPL to extend the right turn bay at the SH87 / Dukes Road North intersection. In my opinion, the short 10 m storage length available at the right turn bay represents an existing safety risk for vehicles following a turning vehicle, particularly longer Heavy Commercial Vehicles (**HCV**), that stop on the highway before turning, and improvements are desirable regardless of whether or not the SLIP is approved.
- 3.2** Following a meeting with NZTA on 18th August to discuss the scope of the works being sought by NZTA, SLPL has agreed to fund the alterations to line markings that would be necessary to create a 20 m long right turn bay. On that basis, I consider that a condition of consent that sets out the scope of works and a time frame for completing the works is appropriate.

4 Paragraph 2.4.

Heavy vehicle route assignment

- 3.3** NZTA has raised a query about heavy vehicle movements to or from the south and which routes would be used.
- 3.4** Table 2-2 of the Transport Addendum provides a summary of the existing wider area movement patterns associated with the Dynes / Icon business. It indicates that there are about 1,700 truck movements in each direction to and from the areas south of Mosgiel. Currently, these are split between the Carncross Street site in Mosgiel and multiple sites in Dunedin. Following the consolidation of the Dynes / Icon activity to the SLIP, the truck movements to and from the south will remain on the network but will now be between the SLIP and the south. This is reflected in the summary in Table 2-5 of the Transport Addendum which indicates no change in the overall truck movements to and from the south.
- 3.5** The existing roads designated for HPMVs include SH87 and Dukes Road North which form part of the strategic road network. I am not aware of any controls that prevent Riccarton Road being used by HCVs (excluding HPMV), which is classified as an Arterial Road, but has not been formed to act as a freight route. The SLIP does not create a requirement for HCVs to use roads other than the designated HPMV routes.

Heavy vehicle volumes

- 3.6** NZTA have raised a concern about the HCV trip distribution on the transport network with future tenants.
- 3.7** The truck movement volume analysis presented in the Transport Addendum reflects full development of the SLIP (Stages 1, 2 and 3) with other freight operators using the available warehouse space. As with the Dynes / Icon activities, relocation of another operator would be expected to provide comparable benefits in terms of reducing movements on SH88

and central Dunedin but is unlikely to alter heavy vehicle volumes south of Mosgiel.

Employee travel

3.8 NZTA⁵ has requested more information on the likely travel patterns of SLIP employees.

3.9 I have been advised that the SLPL anticipates that the SLIP will have about 120 Full-Time Equivalent employees when it reaches full development. Since the ITA Report and Transport Addendum have been based on 150 employees travelling to or from the SLIP on a workday, they provide a conservatively high estimate of employee travel demands.

3.10 Since SLPL cannot control where its employees choose to live, I would expect them to widely disperse across the Dunedin district. Based on the relative populations of Dunedin and Mosgiel, however, it would be reasonable to expect 80% to 90% of employees to be travelling to the SLIP from outside of Mosgiel.

3.11 I understand from SLPL that the SLIP is likely to operate with a day shift from 7:00 AM to 3:00 PM and a night shift from 3:00 PM to 11:00 PM with about 75% of employees working on the day shift and 25% on a night shift. Based on this shift pattern, the SLIP could generate a travel demand of about 100 private vehicles towards Mosgiel from Dunedin before 7:00 AM and an early afternoon peak of about 40 vehicles before 3:00 PM. The early morning arrivals will be in the opposite direction to any commuter traffic heading towards Dunedin from Mosgiel and also well before the typical peak in commuter flows.

3.12 The peak departure period for employees will be after 3:00 PM with the dominant travel direction being towards Dunedin. Again, this will be in the

5 Paragraph 2.7.

opposite direction to the general commuter travel and also earlier in the afternoon than the typical commuter peak period.

- 3.13** Overall, since the SLIP employee travel times do not coincide with the typical commuter peak periods on the network and are in the opposite direction, I do not consider that they will contribute to noticeable effects on the operation of the network.

Cap on movements

- 3.14** The NZTA⁶ has raised a concern about potential effects on the highway network if the SLIP generates more movement than forecast and the potential need for a cap of movement volumes. It is not clear which effect a cap on movements is intended to control because there is no reference to movements that could be generated by ongoing development in the 2GP Industrial Zone.
- 3.15** Even if the SLIP is not approved, there are large areas of vacant land within the Industrial Zone which will contribute to traffic movements on Dukes Road North and SH87 when they are developed. In Error! Reference source not found.-2 of the Transport Addendum I have provided my estimate of future growth on Dukes Road North with and without the SLIP.
- 3.16** In my opinion, the introduction of a cap on movements on the SLIP (or on the Industrial Zone more generally which is not within the scope of the substantive application) could create a situation where landowners were reliant on NZTA to undertake improvements but have no control on when those improvements were completed. Beyond the improvements currently identified by NZTA to extend the right turn bay, a logical next step would involve construction of a roundabout. This would require land outside the existing road reserve and a private landowner would not have authority to acquire any land required for the works. Only NZTA or DCC could do this,

6 Paragraph 2.8.

and no project has been identified in forward plans, and as such there is no funding for any improvements.

Implementation of safety improvements

- 3.17** I agree with NZTA⁷ that the implementation of the works to create a 20 m long right turn bay at the SH87 / Dukes Road North intersection will need to follow standard NZTA procedures.

4. MOSGIEL-TAIERI COMMUNITY BOARD

SLIP heavy vehicle movements generation

- 4.1** The MTCB⁸ has requested an independent review of the forecast heavy vehicle movement volumes at the SLIP.
- 4.2** The forecasts of heavy vehicle movements that will be generated by the SLIP were set out in Section 7 of the ITA Report with some additional information provided in Section 2 of the Transport Addendum. It is not clear what additional information is being sought here. All forecasts have been based on existing movements generated by Dynes / Icon activities, and I consider that this provides a robust basis for establishing future year forecasts.

SH87 Gordon Road

- 4.3** The MTCB⁹ is seeking an upgrade to the SH87 / Dukes Road intersection and consideration of alternative access routes such as Riccarton Road.
- 4.4** SLPL has agreed to a condition of consent requiring them to fund the alterations to line markings that would be necessary to create a 20 m long right turn bay. at the SH87 / Dukes Road intersection.

7 Paragraph 2.10.
8 Page 1, Bullet 3.
9 Page 1, Bullet 4 and 5.

- 4.5** SH87 and Dukes Road North form part of the designated HPMV route. Safety improvements to the SH87 / Dukes Road North intersection are sought by NZTA and I have addressed this above in Section 3 of my evidence.
- 4.6** While I would support a reduction in the speed limit on SH87 for safety reasons between Mosgiel and the Dukes Road North intersection, and also on Dukes Road North, any reduction in the speed limit must follow a process outside the FTAA process. In my opinion, a speed reduction could be justified now even without the SLIP particularly because there are already speed advisories at the intersection which reflect the out-of-context curve geometry for the speed environment.
- 4.7** My understanding of the Land Transport Rule for Setting of Speed Limits 2024 is that a reduction of speed limits cannot be based on an assessment of safety effects alone but also requires an assessment of effects on travel times. I am aware that greater weight is currently given to effects on travel times compared with safety benefits and that typically prevents a reduction in speed limits in practice.
- 4.8** NZTA is currently investigating options for reducing congestion at the SH1 / SH87 interchange. I am unable to comment on the outcomes of that investigation as these are not currently public.

Alternate freight route

- 4.9** The MTCB¹⁰ is seeking that approval of the SLIP is linked to investigations of alternate freight routes such as Riccarton Road. While I understand that a heavy vehicle bypass would create an opportunity to reduce heavy vehicle movements through Mosgiel, I consider that this is a matter for DCC and NZTA to address and not SLPL.

10 Page 1, Bullet 4.

- 4.10** I am aware that there have been investigations into heavy vehicle bypass route options including a Riccarton Road / Dukes Road South option. However, I am not aware of any commitment by either NZTA or DCC to construction of a heavy vehicle bypass route or whether this was considered as part of the current NZTA investigations related to SH1 / SH87.
- 4.11** The MTCB¹¹ is seeking consent conditions required identification, planning and funding pathways for transport upgrades to accommodate the SLIP traffic. In my opinion, a condition such as this is not appropriate because it does not reflect the fact that the SLIP will only account for a small proportion of the total traffic being generated by activities along Dukes Road North both compared with existing traffic generation levels and what could arise when the Industrial Zone is fully developed. Overall, I do not consider that the SLIP generates a need for a heavy vehicle bypass in its own right. Any need for a bypass requires an assessment of the wider freight movement demands and a decision by the Road Controlling Authorities (NZTA and DCC) to alter the existing designated HPMV routes.

5. TE RŪNANGA O OTĀKOU

Heavy vehicle volumes on Gordon Road

- 5.1** The Treaty Impact Assessment (**TIA**) raises concerns about heavy vehicle volumes on Gordon Road on page 20.
- 5.2** I have addressed the potential effects of the increased movements on Gordon Road in the Transport Addendum. Figure 2-2 of the Addendum demonstrates that the SLIP vehicle movements represent a small proportion of the total movements on the state highway classified network.
- 5.3** While I cannot comment on whether the existing volumes of heavy vehicle movement is acceptable to whānau, I do note that Gordon Road is part of the NZTA designated transport network for HPMVs and that the designation

¹¹ Page 1, Bullet 8.

is in place to reduce the potential adverse effects of such vehicles using local roads.

Road safety effects on Gordon Road

5.4 The TIA raises concerns about road safety on page 20.

5.5 I have prepared some additional safety assessment as part of the Transport Addendum. In my opinion, the key points to note are:

- (a) although the SLIP will add to heavy vehicle movements on SH87 Gordon Road through central Mosgiel, the additional movements are travelling straight through rather than turning at intersections;
- (b) Gordon Road forms part of the designated HPMV network;
- (c) within Mosgiel, the existing high volume of vehicle movements on Gordon Road along with pedestrians and cyclists results in moderate safety risk rating for vulnerable road users. I consider that this is mitigated to some extent by the urban speed environment but acknowledge that the existing presence of heavy vehicles does increase the risk of serious injury in the event of a crash; and
- (d) within an urban environment, crashes at intersections are more common than crashes along mid-block sections of road. Since the heavy vehicle movements generated by the SLIP will be travelling straight through at intersections rather than turning, I consider that it is unlikely that they would contribute to a noticeable change in intersection crash rates.

Road safety effects on Stedman Road and Wingatui Road

5.6 The TIA identifies concerns with road safety on Stedman Road and Wingatui Road because of increased use by employees.

- 5.7** All heavy vehicle movements generated by the SLIP will be on Dukes Road North and will not use either Stedman Road or Wingatui Road to access the Site. Any change in vehicle movement volumes on Stedman Road or Wingatui Road will be associated with employee travel to or from the SLIP.
- 5.8** Since there is a range of travel route choices between the SLIP and residential parts of Mosgiel, I would expect the travel demands to be distributed across Dukes Road North, Wingatui Road / Stedman Road and Puddle Alley. In my opinion, similar travel patterns could be expected with any new business that was established in the industrial zone.
- 5.9** There are gaps in the pedestrian network serving the Dukes Road Industrial Zone including the section identified in the TIA along the southern section of Stedman Road, Odlins Place to Wingatui Road. Since the SLIP does not directly affect this section of road, I do not consider that this represents a matter to be addressed by SLPL or is an effect caused by the SLIP. I understand that DCC proposes to construct a path on this section of road.

Level Crossing Safety Impact Assessment

- 5.10** Since the SLIP will increase vehicle movements at the Dukes Road North railway level crossing, I anticipate that KiwiRail will require a Level Crossing Safety Impact Assessment (**LCSIA**) but that is at their discretion.
- 5.11** I am not qualified to undertake an LCSIA but I understand that an LCSIA could recommend improvements to the crossing to improve safety.

Mosgiel Freight Corridor

- 5.12** Page 22 of the TIA raises a concern that Gordon Road will become embedded as a freight corridor.
- 5.13** I have discussed this matter in my response to the comments from the MTCB at paragraph 4.9. I re-iterate that in my opinion, any consideration of

or investigation of a heavy vehicle bypass route remains the responsibility of DCC and NZTA rather than SLPL because the effects of heavy vehicle movements on Gordon Road are associated with existing region wide freight movements and are not specific to the SLIP.

6. CRAIG AND JOANNE INCH

6.1 The primary concern in the Inch comments relates to increased movements, particularly heavy vehicles, through Mosgiel and the lack of consideration for a heavy vehicle bypass.

6.2 I have addressed this in my responses to the comments from both MTCB and in the TIA. Regardless of the SLIP proposal, ongoing development of the Dukes Road Industrial Zone will contribute to more heavy vehicle movement through Mosgiel. The issue of a heavy vehicle bypass to improve amenity and safety in the town centre represents a matter to be addressed by NZTA and DCC because it affects region wide freight movement and is not specific to, or triggered by, the SLIP.

6.3 I have addressed the SH87 / Dukes Road intersection in Section 3 above.

7. JANE AND BERNIE MCLEOD

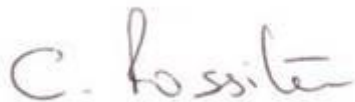
7.1 Similar to the Inch comments, the primary concern relates to the lack of consideration of a freight bypass to reduce transport effects on the Mosgiel town centre.

7.2 Beyond what I have set out above in Sections 3 and 4, I re-iterate that the provision of a heavy vehicle bypass is an issue that is not specific to the SLIP truck movements requirements but is driven by the region wide freight movement on SH87 and activity in Dukes Road Industrial Zone. Investigation and development of any heavy vehicle bypass route is a matter for NZTA and DCC and not SLPL.

8. CONCLUSION

- 8.1** Overall, I remain of the opinion that the proposed conditions of consent relating to transport are generally appropriate subject to some minor wording alterations as indicated in this brief.
- 8.2** I disagree with DCC that the SLIP generates a requirement for widening of Dukes Road North east of Stedman Road beyond what is required for formation of the right turn bay at the SLIP entrance. In my opinion, the existing formation provides sufficient width for two-way movement of the future traffic volumes inclusive of SLIP traffic.
- 8.3** From a road safety perspective, I support the request by NZTA for safety improvements at the SH87 / Dukes Road intersection, specifically the extension of the right turn bay. Following a meeting with NZTA, SLPL have agreed to fund the alterations to line markings that would be necessary to create a 20 m long right turn bay. On that basis, I consider that this should be required as a condition of consent.

Dated: 19 August 2026



Michael Christopher Rossiter