

MAY IT PLEASE THE PANEL CONVENER

1. This memorandum is filed on behalf of Southern Link Property Limited (**SLPL**) in accordance with Minute 2 of the Panel Convener dated 20 May 2026 (**Minute**). It addresses the matters that SLPL has been asked to respond to as the Applicant for the Southern Link Inland Port (**Project**) sought under the Fast-track Approvals Act 2024 (**FTAA**).¹

Confirmation of Attendees

2. The following will be present at the Convener Conference on behalf of SLPL:
 - (a) Sarah Scott, legal counsel;
 - (b) John Kyle, consultant planner;
 - (c) Megan Hankey, consultant planner;
 - (d) Kevin Kearney, SLPL;
 - (e) Grant Driver, SLPL; and
 - (f) Joanne Dowd, SLPL.

Approvals Sought

3. SLPL is applying for all resource consents necessary to authorise activities associated with the construction, use and operation of the Project, which would otherwise be applied for under the Resource Management Act 1991 (**RMA**), as outlined in Section 4.3 of the substantive application.

Extent of engagement by the Applicant

Pre-lodgement

4. The approach to, and extent of SLPL's pre-lodgement consultation and engagement is outlined in Section 5 of the substantive application. As the Project is a Referred Project rather than a Listed Project, engagement and consultation also occurred at the referral stage.² SLPL has engaged and consulted with relevant administering agencies, iwi and key stakeholders prior to lodgement. That includes KiwiRail, Civil Aviation Authority,

¹ Version of FTAA as at 31 March 2026.

² This also means that section 29 of the FTAA – pre-lodgement requirements for listed projects - does not apply.

Helicopters Otago, Otago Aero Club and the Taieri Airport Trust (owners of Taieri Aerodrome).

5. SLPL has agreed to peer reviews (as relevant) of the technical assessments included in the substantive application by Dunedin City Council (**DCC**), Otago Regional Council (**ORC**) and Kā Rūnaka.

6. The extent of pre-lodgement engagement and consultation with the parties invited to the Convener Conference is summarised below (refer to substantive for further details):

(a) DCC:

(i) SLPL first commenced engaging with DCC in relation to the Project in January 2025. DCC provided comments on the referral application for the Project, as well as the draft technical assessments prepared for the substantive application;

(ii) SLPL has hosted DCC representatives onsite on various occasions and has held meetings and workshops with SLPL's technical experts to clarify and discuss feedback on draft technical reports. The comments have been considered and largely responded to prior to the lodgement of the substantive application for the Project.

(b) ORC:

(i) Preliminary discussions on the Project between SLPL and ORC began in May 2024. SLPL has since had multiple in person and online discussions with ORC. The discussions have primarily focussed on understanding and addressing actual and potential flood risks on the Site, which informed the stormwater design system for the Project, with the proposed design achieving hydraulic neutrality;

- (ii) SLPL has also hosted ORC representatives onsite and held workshops to clarify and discuss feedback on draft technical assessments. These comments, along with peer reviews, have informed the development of the application, including the proposed management measures.

- (c) Kā Rūnaka:
 - (i) SLPL has engaged with representatives of Te Rūnanga o Ōtākou prior to lodging the referral application and on an on-going basis since then. That engagement has been founded on a Process Agreement dated 19 May 2025 that was signed with Ōtākou, Kati Huirapa ki Puketeraki Incorporated and Te Rūnanga o Moeraki Incorporated prior to the referral application being lodged (and which applies to the Substantive Application process and forms part of the Application documents). That Process Agreement confirms that SLPL does not need to engage with Te Rūnanga o Ngāi Tahu separately;
 - (ii) In February 2026, Ōtākou provided SLPL with a draft Treaty Impact Assessment, and following further engagement and sharing of further information, an updated draft Treaty Impact Assessment (**draft TIA**) was provided in April 2026. The draft TIA includes a cultural impact assessment.

Post-lodgement

7. Following lodgement of the substantive application on 17 April 2026, SLPL has continued to engage and consult with DCC, ORC, Kā Rūnaka and

adjacent landowners, with the objective to continue to narrow differences including in respect of drafting of conditions. That has included:

(a) DCC:

- (i) DCC has provided peer review comments on Biodiversity, Landscape, Geotechnical and Traffic. These peer reviews will result in some changes to the condition set, which SLPL is currently working through. There are some traffic related conditions that will require further clarification from Council;
- (ii) DCC has advised that further comments are expected relating to Contaminated Land, Natural Hazards, Light Spill and Noise;
- (iii) DCC has advised that changes to the format and structure of conditions would be helpful;
- (iv) SLPL has offered to workshop with DCC on conditions, should they consider that necessary.

(b) ORC:

- (i) A conditions workshop is occurring on 28 May 2026 (after the date of this memorandum and before the Convener Conference). Kā Rūnaka have been invited to that workshop.

(c) Kā Rūnaka:

- (i) A hui was held on 19 May 2026 to identify key outstanding issues and provide clarification on a selection of matters raised in the draft TIA. Next steps on the proposed conditions, management plans and iwi involvement in co-design were also discussed and SLPL will continue to work with iwi in relation to these matters;

(ii) SLPL have requested that the draft TIA be finalised, and intends to lodge it with the Panel prior to written comments being requested under s 53 of the FTAA.

(d) Adjacent Landowners:

(i) Briefing of project and offer to meet adjacent landowners. As at 27 May 2026, SLPL has met with eight adjacent landowners, with other meetings planned and follow-ups diarised where there has been no reply.

Complexity

8. Only RMA approvals are sought. While the reports provided as part of the substantive application are extensive and address technical matters, the substantive application for the Project does not present any evidential or factual issues that are particularly complex or novel which would significantly extend the decision-making timeframe.

9. All assessments follow well established methodologies and statutory frameworks under the FTAA and RMA. The comprehensive approach to the application ensures the effects of the Project are understood and comprehensive measures have been proposed to address these effects.

10. In relation to legal complexity, the legal assessment criteria for the RMA Approvals has been well covered in a number of Panel Decisions including in particular the Panel Decision on the Waihi North project (by Oceana Gold). The application for the Project under the FTAA does not introduce any novel or untested legal issues.

Proposed conditions

11. The substantive application includes a complete suite of proposed conditions for all approvals sought.

- 12.** The Panel Convener's guidance note provides that applications with conditions reliant on management plans should provide draft management plans with their application. The substantive application includes:
- (a) a Draft Construction Management Plan (that includes Erosion and Sediment Control and Spill Response provisions) (proposed ORC Conditions 4-9 and DCC Conditions 18-20);
 - (b) a Draft Contaminated Site Management Plan (proposed DCC Conditions 29-31 and ORC Conditions A.3-A.4);
 - (c) a Draft Remedial Action Plan (proposed DCC Conditions 32-34 and ORC Conditions A.5-A.6); and
 - (d) the conditions provide for the final version of the management plans to be submitted to DCC and ORC for certification.
- 13.** If further changes to conditions are agreed through the ORC workshop and other on-going engagement as described above (ie. with DCC and Kā Rūnaka), SLPL may lodge an updated condition set prior to written comments being requested under s 53 of the FTAA.

Issues

- 14.** Based on consultation taken to date, SLPL anticipate that the following matters are likely to be subject to feedback from parties invited to comment:
- (a) traffic impacts external to the Site;
 - (b) matters relating to the Silver Stream which is located within the Site, including stormwater and ecology values / effects;
 - (c) construction related effects and contaminated land;
 - (d) amenity effects (eg noise);
 - (e) cultural effects; and
 - (f) condition set structure.

Timeframes and Panel Process / procedural requirements

- 15.** SLPL's estimated timeframe is set out in **Appendix A**. SLPL respectfully requests a decision timeframe of **60 working days** from the date specified for receiving comments under s 53 of the FTAA.
- 16.** In putting forward this decision timeframe, SLPL has considered the scale, nature and complexity of the approvals sought. SLPL considers this should ensure sufficient time so that the quality of decision making is not impacted and would not over allocate time consistent with the principles of s 10 of the FTAA.
- 17.** In terms of the application process and proposed procedural steps, SLPL is willing to engage directly with the Panel as necessary to advance progress of the application efficiently. It welcomes the opportunity to provide the Panel with a **Project Briefing** alongside a **Site Visit** and will engage constructively in any conferences or meetings that are directed. At this stage it appears premature to suggest that any particular process is required (eg. expert conferencing).

Panel membership

- 18.** Counsel respectfully submits that the Panel Convener convene a panel comprised of persons with the following expertise, knowledge and experience:

 - (a) an experienced planner with experience in industrial developments, including drafting of conditions; and
 - (b) infrastructure, including stormwater.

19. SLPL does not consider that there are any factors that warrant more than four panel members.

Dated: 27 May 2026

A handwritten signature in black ink that reads "Sarah J. Scott". The signature is written in a cursive style with a large initial 'S' and 'J'.

S J Scott
Counsel for Southern Link Property Limited

Appendix A

	Task	Working Days	Date
1	Panel Commencement	N/A	11 June
2	Invite comment from relevant parties	10 w/days after Step 1	25 June
3	Comments close (s53 & s54)	20 w/days after Step 2	24 July ³
4	Comments close for applicants (s55)	5 w/days after Step 3	31 July
5	Any other procedural steps, evaluation and decision writing	30 w/days	
	Draft decision is to approve		
6	Draft decision and conditions to Ministers (s72) ⁴	30 w/days after Step 4	11 September
7	Response from Ministers (s72)	10 w/days after Step 6	25 September
9	Draft decision and conditions to participants (s 70(1))	Simultaneously with Step 6	11 September
10	Participant comments on draft conditions (s70(2))	10 w/days after Step 9	25 September
11	Applicant response to participants and Ministers on conditions (s 70(4))	5 w/days after Steps 7 and 10	2 October
12	If not agreed, procedural step in relation to draft conditions	10 working days	
13	Evaluate and finalise decision		
14	Decision release (s 79(1)(b))	60 w/days from Step 3	16 October

³ Note: Matariki, 10 July.

⁴ Assumes that s70 and 72 is run in parallel.