

Memorandum on Completeness and Scope

File	FTAA-2604-1207
Application	Southern Link Inland Port
To	Ben Bond, Team Leader LOA
From	
Date	11 May 2026
Subject	Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

Purpose

1. The purpose of this memo is to assist you in making your decision on whether the Southern Link Inland Port application, received by the Fast-track Team on 17/04/2026 complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 31 March 2026.

Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

The application

4. The Southern Link Inland Port was referred by the Minister for inclusion in the Fast-track consenting process under section 28 of the Act. The Minister accepted the referral application on 26 August 2025 and notified the EPA of the decision on the referral application on 26 August 2025.
5. The EPA received the substantive application for Southern Link Inland Port on 17/04/2026 by Southern Link Property Limited. The EPA must, in consultation with the

relevant administering agencies and relevant consent authorities, decide whether this substantive application complies with section 46 of the Act by 11 May 2026.

6. As set out in more detail below, the EPA must decide whether the application is complete and either:
 - Notify the Panel Convener they can set up an expert consenting panel to make a decision on the application (if complete and within scope); or
 - return it to the person who lodged it (if incomplete and/or not within scope).

Project and Scope

7. The substantive application must relate solely to the referred project. Project, in relation to an unlisted but referred project, means the project as described in the notice under section 28 (the **Notice**). The referred project is described in the Notice as follows:

“...to establish and operate an inland port / logistics hub to service Port Otago at 270-292 Dukes Road North, North Taieri (legally described as Part Section 9 Block V East Taieri Survey District, Part Section 10 Block V East Taieri Survey District, & Deposited Plan 5579 East Taieri Survey District).

The application seeks to establish and operate an inland port / logistics hub to service Port Otago at 270-292 Dukes Road North, North Taieri. The project comprises:

- a. A rail siding to enable a rail freight shuttle service to Port Chalmers and the wider rail network;
- b. High stud warehousing (chilled and ambient);
- c. A truck canopy and unloading area;
- d. A container depot facility;
- e. A container terminal for storage of full containers;
- f. Break bulk storage facilities;
- g. Road widening and upgrades to the Dukes Road rail crossing; and
- h. Ancillary activities to support the above, including earthworks, construction of the rail siding, site access, internal roadways and parking, hardstand areas, landscaping, buildings for storage, administration and maintenance facilities, and associated infrastructure and works including measures necessary to manage stormwater and stabilise the site.

The project is proposed to be delivered in three development stages, with initial infrastructure and facilities built within 12-18 months post-approval, expanded container storage and warehousing added within 2-5 years, and further development occurring over 5-10+ years as demand grows. The applicant intends to lodge one substantive application for all stages of the project.”

8. The application relates solely to the referred project, as the project description provided in the substantive application aligns with the activities outlined in the referral decision, both in nature and scale. The initial application was initially submitted on 16 March 2026 but then withdrew on 7 April

2026. In their resubmission on 17 April 2026, the Applicant provided a cover letter and table (found in Part A.02 of the Substantive Application) outlining all the relevant changes. On 4 May 2025, we sought clarification of the size of the high stud warehousing, as the new application stated that it was “approximately” 80,000 square metres, while the s 28 notice provides for “up to” 80,000 square metres. On 4 May 2026, the Applicant responded and advised that the total size of the warehousing would be 79,802 square metres. The EPA’s request for information and the Applicant’s response is appended as Appendix 3 to this memo.

9. Considering these changes, together with the rest of the application, we have found the application is within scope.

Fast-track consenting application process

Legislative context

10. The EPA must decide, in consultation with relevant administering agencies and consent authorities, whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
 - complies with sections 42, 43 and 44;
 - relates solely to a listed project or a referred project;
 - the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
 - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.
11. The EPA may request further information from the applicant under section 46(2A) for the purposes of determining whether the application is complete and within scope.

Section 42 Requirements

12. Section 42 of the Act states that an authorised person may lodge a substantive application for the project, 1 substantive applications for each stage of a project if the Minister has determined that the project may proceed in stages (either under s 21(1)(a) or s 37A). Section 42(4) lists the approvals that may be sought under the Act.
13. The approvals being sought are:
 - a. resource consents under the Resource Management Act 1991.
14. All the above listed approvals are of the type set out in section 42(4) of the Act.

Section 43 Requirements

15. Section 43 of the Act sets out the requirements for a substantive application. The substantive application was lodged in the form and manner approved by the EPA. Assessment of section 43 requirements is included at Appendix 1.

Section 44 Requirements

16. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at Appendix 1.
17. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in Appendix 2.
18. As set out in more detail in Appendix 2, the agencies consulted have advised that the information required by section 44 is provided in **sufficient** detail to satisfy the purpose for which it is required.

Ineligibility

19. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
20. The list of ineligible projects includes activities:
 - on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
 - on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
 - in a customary marine or protected customary rights area without written agreement from the rights holder/group;
 - within an aquaculture settlement area without the required authorisation;
 - activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
 - that require permissions on national reserves (or reserves vest in another person) held under the Reserves Act 1977 ; or
 - on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).
 - That are prohibited under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012, or section 15B or 15C the Resource Management Act 1991.
 - That relate to decommissioning under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012
 - That are undertaken for the purposes of an offshore renewable energy project.

21. I consider that, on the face of the application, the project does not appear to involve an ineligible activity.

Fees and levies

22. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:
- Application fee in the sum of \$250,000 plus GST;
 - Levy in the sum of \$140,000 plus GST; and

Consultation

23. We have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:
- with Otago Regional Council and Dunedin City Council for an approval described in section 42(4)(a) (resource consent).
24. A summary of the consultation is included at Appendix 2.

Assessment of compliance for each section of each application form

25. I have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in Appendix 1 for ease of reference.
26. My view is that the application does comply with section 46 and the EPA may now notify the applicant of its decision.
27. The EPA must now decide whether the substantive application has a competing application under section 47A(1) (under delegation from the Minister for Infrastructure under section 47C) within 10 working days from the date of the completeness decision.
28. Once the EPA has made the decision under section 47A(1), the EPA must notify the panel convener that an expert consenting panel can be set up to commence consideration and decision of the application.

Appendix 1: Assessment of section 44 sufficiency

My assessment of the application materials is set out in the relevant checklists below:

CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference	EPA
5(1)(a)	A description of the proposed activity	Part A.02 - Substantive Application – Section 2 (Project Description) Page 22.	Addressed, as referenced. A Request for Information was sent to the Applicant to clarify the scope around the amount of high stud warehousing. The request and response can be found in Appendix 3. We are satisfied with the Applicant's response.
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to— (i) a statutory area (as defined in the relevant Treaty settlement Act); or (ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or	Part A.02 - Substantive Application – Section 3 (Existing Environment) Page 71.	Addressed as referenced and under section 3.6.4 on page 94.

	(iii) a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011		
5(1)(c)	Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being: • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid.	Part A.02 - Substantive Application – Section 8 (Fast-track Approvals Act 2024 Requirements) Page 225.	s43(1)(a) - Addressed as referenced, specifically in 8.4 page 226. s43(1)(b)(i) Addressed as referenced, specifically Section 1.2 and 8.6 of the report. s43(1)(b)(ii)(B) Section 2.4 (page 28). s43(1)(c) Addressed as referenced, specifically 8.7 (page 233).
5(1)(d) and 5(6)	The full name and address of— (i) each owner of the site and of land adjacent to the site; and (i) each occupier of the site and of land adjacent to the site whom the applicant is able to identify after reasonable inquiry; If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership,	Part A.02 - Substantive Application – Section 3 (Existing Environment) Page 71 & Part H - Land Ownership and	Addressed as referenced.

	the applicant must include a statement to that effect (clause 5(6)).	Records of Title.	
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	Part A.02 - Substantive Application – Section 2 (Project Description) Page 22.	Addressed as referenced.
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	Part A.02 - Substantive Application – Section 4 (Approvals Required) Page 124.	Addressed as referenced.
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991	Part A.02 - Substantive Application – Section 9 (Approvals Relating to the Resource	Addressed as referenced.

		Management Act 1991) Page 237.	
5(1)(h) (and also clauses 5(2) and 5(3))	An assessment of the activity against any relevant provisions in any of the following documents: • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement: • a regional policy statement or proposed regional policy statement: • a plan or proposed plan: • a planning document recognised by a relevant iwi authority and lodged with a local authority. This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being: • any relevant objectives, policies or rules in the documents listed; and • any requirement, condition, or permission in any rules in any of those documents; and • any other requirements in any of those documents.	Part A.02 - Substantive Application – Section 9 (Approvals Relating to the Resource Management Act 1991) Page 237.	Addressed as referenced, specifically from page 240.

5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including— (i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area	Part A.02 - Substantive Application – Section 2 (Project Description) Page 22.	Addressed in section 9.3.16 on page 344 and section 3.6.4 on page 94.
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;	Part A.02 - Substantive Application – Section 2 (Project Description) Page 22.	Addressed in section 3.6.4 on page 94.
5(1)(k)	Any conditions that the applicant proposes for the resource consent.	Part C - Conditions	Addressed as referenced.
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— (i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and	Part F.01 - Section 30(3)(b) Letter from	Addressed as referenced, specifically F.02 for council’s response.

	(ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.	Otago Regional Council	
5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6.	Part A.02 - Substantive Application - Section 6 - (Assessment of Environmental Effects) Page 156.	Addressed as referenced.
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7.	Part A.02 - Substantive Application - Section 6 - (Assessment of Environmental Effects) Page 156.	Addressed as referenced.

6	(1) The assessment of an activity's effects on the environment must include the following information: (a) an assessment of the actual or potential effects on the environment: (b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use: (c) if the activity includes the discharge of any contaminant, a description of— (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and (ii) any possible alternative methods of discharge, including discharge into any other receiving environment: (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity: (e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal:	Part A.02 - Substantive Application - Section 6 - (Assessment of Environmental Effects) Page 156.	Addressed as referenced.
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	(f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision: (g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved: (h) an assessment of any effects of the activity on the exercise of a protected customary right.		
7	The assessment of an activity's effects on the environment must cover the following matters: (a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: (b) any physical effect on the locality, including landscape and visual effects: (c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity: (d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:	Part A.02 - Substantive Application - Section 6 - (Assessment of Environmental Effects) Page 156.	Addressed as referenced.

	(e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: (f) any unreasonable emission of noise: (g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.		
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991)	Part G - Rules Assessment	Addressed as referenced.
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document	N/A	
5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaihai reserve, or an area that is subject to bylaws made	N/A	

	under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.		
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Appendix 2: Consultation Summary

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

1. **Consultation with Otago Regional Council and Dunedin City Council** as the relevant consent authorities under the Resource Management Act 1991:

- Resource consent (section 42(4)(a) of the Act)

Response from Otago Regional Council:

A review shows that the application documentation available in the EPA application portal meets the requirements of sections 42 and 43 of the Act and has been provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

Section 30 Confirmation

The EPA also asked the following specific question in accordance with section 30 of the Act: • Confirm that the written notice prepared by the Council remains accurate and final at the time of receiving this letter. I confirm that the letter dated 5 March 2026 regarding Section 30(3)b remains accurate and final.

Response from Dunedin City Council

The Council has undertaken a high-level review of the information provided in the application and is satisfied that it meets these requirements. In particular, the summary of consents sought detailed in Section 4.3.1 of the Substantive Application Report (Part A.02A of the application), the technical reports provided (Part B) and the identification of 2GP District Plan rule breaches (Part G.01) appear to indicate that the matters the DCC would wish to see addressed have been covered in the application.

Appendix 3: Request for Information and response

File ref: **FTAA-2604-1207**

4 May 2026

Polly Smith
Southern Link Inland Port
polly.smith@mitchelldaysh.co.nz

Tēnā koe,

Request for further information in relation to your application under the Fast-track Approvals Act 2024

You lodged a substantive application, Southern Link Inland Port, under the Fast-track Approvals Act 2024 (the Act) on 17 April 2026.

Prior to referring a substantive application to an Expert Panel, the EPA must assess the completeness and scope of the application to ensure it complies with section 46(2) of the Act. To assist with making this assessment, under section 46(2A) of the Act the EPA may seek further information from you.

Request for Further Information

To inform the EPA's assessment of the application for completeness, please provide a response to the following matters:

- Clarification on the size of the high stud warehousing component of this project. We would appreciate if you could clarify what is meant by 'approximately 80,000m²' in this context, given that the Minister's decision notice refers to 'up to 80,000m²'? We would appreciate further information on how this is applied in practice so we can more clearly assess the scope.

Responding to the Request for Further Information

Under the Act, you have until the end of the 20th working day from the date of this letter to provide a response to the EPA, which is **2 June 2026**.

From the date of this letter, the 15 working day timeframe for the EPA to decide on completeness and scope of the substantive application ceases to run. The 15 working day timeframe will recommence once your response is received or after **2 June 2026**, whichever is sooner.

If you wish to clarify any matter relating to the request, and the request was generated from the EPA's consultation with an administering agency or local authority, we suggest that you contact that administering agency or local authority directly before providing your response to the EPA.

If you require information from the EPA in relation to the request for further information, you may request that information from the EPA under section 46(2C) of the Act. Please send your request to projects@fasttrack.govt.nz.

The EPA intends to publish the information received from you in full, including your responses in our completeness memorandum, on the Fast-track website.

If you have any questions, please contact [REDACTED], Application Lead by email at info@fasttrack.govt.nz.

Nāku noa, nā

A handwritten signature in black ink, appearing to be 'BB' followed by a horizontal line.

Ben Bond

Team Leader, Fast-track Applications

4 May 2026

Environmental Protection Authority
info@fasttrack.govt.nz

Dear Ben

RE: Request for Further Information Relating to the Substantive Application for the Southern Link Inland Port (FTAA-2604-1207)

In response to the request for further information provided on Monday 4 May, we can confirm that the high stud warehousing proposed as part of the Southern Link Inland Port (FTAA-2604-1207) will be **up to** 80,000 m² in ground floor area, as detailed in the Minister's decision notice.

Where references are made throughout the application documentation to '*approximately 80,000 m² of high stud warehousing*', warehousing will be no more than 80,000 m², and therefore the aforementioned references can be interpreted as '*up to 80,000 m² of high stud warehousing*' as per the Minister's decision notice.

As per the lodged master plan (refer to application document Part E.02 – Master Plans – April), the summation of proposed high stud warehousing equates to 79,802 m², comprising:

- > Warehouse 1A – 16,374 m²;
- > Warehouse 1B – 16,374 m²;
- > Warehouse 2A – 16,374 m²;
- > Warehouse 2B – 11,000 m²;
- > Warehouse 2C – 12,100 m²; and

> Warehouse 3D – 7,580 m².

We trust this clarification is sufficient for the purposes of responding to the identified matter.

Yours sincerely,



Polly Smith
Mitchell Daysh Limited

polly.smith@mitchelldaysh.co.nz

