

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 MICHAEL WILLIAM MOORE ON BEHALF OF
SOUTHERN LINK PROPERTY LIMITED**

LANDSCAPE EFFECTS

19 August 2026



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1. INTRODUCTION

1.1 My full name is Michael William Moore. My qualifications and experience, and my role in the Southern Link Inland Port Project (**SLIP**) are set out in my report dated 17 June 2026 included in Part B.07 of the substantive application for the SLIP.

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. The experts / persons I respond to are:

(a) Luke McKinlay, Landscape Architect, Dunedin City Council

1.3 I have also been asked by SLPL to address the proposed changes to the consent conditions discussed in the evidence of Bridget Gilbert.

Code of Conduct

1.4 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. LUKE MCKINLAY, LANDSCAPE ARCHITECT, DUNEDIN CITY COUNCIL

2.1 Mr McKinlay prepared a memorandum dated 13 May 2026 relating to an early draft of my report (dated 16 April 2026) and has more recently provided additional comments dated 16 July 2026 relating to my final report (dated 17 June 2026). Below, I address the issues that I consider remain current in both memoranda.

Issue 1: Confirmation that the VirtualView images illustrate the maximum potential height of warehouse buildings 2A and 1B

2.2 In his 13 May memorandum, Mr McKinlay sought confirmation that the VirtualView images illustrate the maximum potential height of warehouse buildings 2A and 1B, i.e. 18m. He also suggested it would have been helpful if the warehouse buildings shown in Viewpoint 2 were identified.

2.3 I confirm that the images show these warehouses at 18m height to illustrate the maximum possible effect. The Viewpoint 2 simulations filed with the EPA in June include annotations identifying the buildings visible.

Issue 2: Retention of the small cluster of large trees in the north-eastern corner of the site, near the truck parking area

2.4 In his 13 May Memorandum, Mr McKinlay recommends retention of the small cluster of large trees in the north-eastern corner of the site, near the truck parking area.

2.5 This is addressed at paragraph 40 of my report. It is intended that these trees will be retained where possible.

Issue 3: Variety in cladding colours for warehouse buildings

2.6 In his 13 May Memorandum, Mr McKinlay recommends that consideration be given to varying the colour of the different main warehouse blocks with a palette of complementary visually recessive colours, to help reduce their bulk and scale, and to ensure they read as separate components and not one larger structure.

2.7 Whether there is just one colour treatment for all the buildings throughout, or some subtle variation, in my view the key consideration is that colours are as recessive (dark) as possible within operational constraints, and blend

well with rural landscape colours. The current proposed building design condition provides some flexibility (appropriately in my opinion) and states:

'The finished external colours of all buildings and structures are to be of a consistent palette across the site, with: (a) Acoustic walls and site buildings to be finished in colours with a mid-dark tone and light reflectance value of 30% or less; and (b) Warehouse roofs to have lighter tones with light reflectance values of 45% - 50%.'

Issue 4: Cumulative effects of the development in relation to nearby industrial development

- 2.8** In his 13 May memorandum, Mr McKinlay states that 'further consideration could have been given to the cumulative effects of the development, when considered alongside the neighbouring industrial area.'
- 2.9** As noted in Te Tangi a te Manu¹ cumulative effects are '*the effects of a proposal in combination with those of previous developments*'. The guidelines note that '*in one sense all effects are cumulative*'. In this case the neighbouring industrial area is a lawfully established part of the existing environment against which the effects of the proposed SLIP have been assessed.
- 2.10** Paragraphs 60 – 62 of my report notes that the proposed development will be perceived as an extension of existing industrial character but that while consistent with the general size, shape and appearance of industrial warehouses, the proposed SLIP built elements will be larger than those currently existing.
- 2.11** Cumulative effects become significant where an additional effect takes a landscape beyond a tipping point. In this case it is my assessment that the character of the context landscape is already defined by being at the interface of urban / industrial and rural environments. The proposed mitigation measures will assist to minimise additional industrial effects through boundary planting, building colour and lighting controls. I consider

1 Te Tangi a te Manu para 6.46 – 6.48

that while the industrial / rural interface will shift and that existing industrial character will be reinforced, no tipping point will be reached such that the existing landscape character becomes fundamentally changed within the wider context.

Issue 5: Visual effects rating – 340 Dukes Road

- 2.12** In his 13 May memorandum Mr McKinlay states his opinion that adverse visual effects from 340 Dukes Road are likely to be higher than assessed (adverse / low-moderate) and will be ‘at least moderate’ given that there will be views of the large warehouse buildings.
- 2.13** I have reviewed my assessment and confirm my conclusion in relation to this site on the basis that the house is approximately 340m distant from the closest warehouse building, and that views of the warehouses will be mitigated by the proposed recessive building colours and screen plantings. I note too, that there do not appear to be any spaces on the western side of the house developed for outdoor living. I also note that the owner of 340 Dukes Road North has made comment in support of the proposed SLIP development and has not expressed concern in relation to visual effects.

Issue 6: Incorporation of cultural landscape matters in the overall rating of landscape effects

- 2.14** In his 16 July memorandum Mr McKinlay quotes the final TIA and states that ‘it is unclear if the final LNCEA has managed to incorporate all cultural landscape matters in a way that represents the view of Ōtākou’. He also states that ‘it is unclear whether the overall effects ratings in the final LNCEA reflects the findings of the TIA’.
- 2.15** My final LNCEA report (dated 17 June 2026) was facilitated by review of the final (unendorsed) TIA and by advice from Dr Alayna Rā. As noted in paragraphs 25 and 55, the report has endeavoured to reflect the cultural landscape values and assessments of effects on these values wherever

these matters are addressed in the final TIA. In paragraph 73 of my June report I endeavour to be explicit as to the matters considered in arriving at my overall effects rating. These include consideration of effects assessments made in the TIA. I acknowledge that notwithstanding the findings of the freshwater ecology assessment that effects on the ecology of Whakaehu will be low, the TIA expresses concern about uncertainty regarding some effects related to the mauri and associated cultural values of the waterways. I understand that no evidence on this point has been filed as part of Te Rūnanga o Ōtākou s 53 comment.

Issue 7: Additional compensatory mitigation for the site at 273 Dukes Road North

2.16 At paragraph 305 of the Dunedin City Council Comments report, it is stated that consideration should be given as to whether additional compensatory mitigation is appropriate at 273 Dukes Road North.

2.17 I have assessed the visual effects from this dwelling as adverse / high. I consider that planting on the property between the house and Dukes Road North could be effective in mitigating adverse effects. An Offsite Visual Mitigation Plan Condition is proposed by the applicant which would apply to 273 Dukes Road North, and I consider that this condition is appropriate.

3. BRIDGET GILBERT, LANDSCAPE ARCHITECT, SLPL

Issue 1: Recommended conditions

3.1 In her brief of evidence in paragraphs 15 - 16, Ms Gilbert recommends two new landscape-related consent conditions. These require a Landscape Management Plan to be certified by Dunedin City Council, an Offsite Visual Mitigation Plan relating to the property at 273 Dukes Road North, and minor refinements to the stormwater and acoustic barrier conditions with respect to the appearance of structures. The proposed conditions are outlined in full in Ms Gilbert's evidence.

3.2 I consider that the conditions proposed by Ms Gilbert are appropriate.

Dated: 19 August 2026

A handwritten signature in blue ink, consisting of a stylized 'M' followed by a wavy line.

Michael William Moore