

**EXPERT WITNESS CAUCUSSING CONFERENCE
AND JOINT WITNESS STATEMENT**

TRANSPORT

PROJECT	The substantive application for the Southern Link Inland Port under the Fast-track Approvals Act 2024 (FTAA)	
APPLICANT	Southern Link Property Limited (SLPL)	

Date	4 September 9:00AM – 11:00AM (CR, MG, KB, RJ, RM)
	4 September 1:00PM – 2:00PM (CR, MG, KB, RJ, RM, HC)
	7 September 12:00 PM – 12:30PM (CR, MG, RM, RJ, HC)
Venue	MS Teams (online)

Witnesses	Role	For
Chris Rossiter (CR)	Transportation Engineer (Stantec)	Applicant, Southern Link Property Limited (SLPL)
Mark Georgeson (MG)	Transportation Engineer (Stantec)	Applicant, Southern Link Property Limited (SLPL)
Helen Chapman (HC)	Transport Planner	Dunedin City Council (DCC)
Reese Martin (RM)	Transport Planner / Engineer	Dunedin City Council (DCC)
Kelly Blackie (KB)	Transport Planner	NZTA
Roy Johnston (RJ)	Principal Safety Engineer	NZTA

JOINT WITNESS STATEMENT

INTRODUCTION

1.	This conference relates to the application for approvals by SLPL to authorise the construction, use and operation of the Southern Link Inland Port, an inland port / logistics hub at 270-292 Dukes Road North, North Taieri, Mosgiel (the Project or SLIP).
2.	The Expert Panel has directed conferencing between the technical experts engaged by SLPL, NZTA and DCC. Minute 9 of the Expert Panel sets out the Issues and Questions that they have directed be addressed in a Joint Witness Statement.
3.	Some of the questions posed are essentially a request for further information (RFI) from the applicant. Various information has been prepared by SLPL and is included in Appendix 1. Various information is subject to commercial confidence and for that reason has been redacted. A report authored by Chris Rossiter and Mark Georgeson (of Stantec), attached as Appendix 2. Mark Georgeson has engaged in expert conferencing given he has assisted with the request for further information and assessment in Minute 9.
4.	For context, Minute 9 defines the following terms as: a) The rail mode shift: means the transfer of container freight from road to rail on which the Project location has been fundamentally chosen and on which the Project’s claimed transport benefits

	depend. b) The assumed rail mode share: means the proportion of freight assumed to be carried by rail in the Applicant's assessment. c) References to heavy vehicle movements: correspond to NZTA's heavy commercial vehicle (HCV) classification.
5.	All participants agree to the following: a) They have read and understood the Panels Minute 9 dated 26 August 2026; b) They will comply with the relevant provisions of the Environment Court Practice Note 2023; c) They agree that the outcome(s) of the expert conferencing are as recorded in this statement; d) The matters addressed in this statement are within their area of expertise, except where the participants state otherwise.

QUESTIONS

Issue 1 — Whether the rail mode shift will be achieved in practice

Consider background of Minute 9 paragraphs [1]-[9].

To Chris Rossiter (for the Applicant). The Panel wishes to understand whether the rail mode shift is sufficiently certain to be relied upon. Please address:

Q1(a)	the assumed rail mode share, expressed as a proportion of container volume and of total freight movements, at each of Stages 1, 2 and 3, and the operational evidence supporting that share;
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 1.1.
DCC / NZTA	Accept the information provided in Appendix 2.
Q1(b)	your opinion as to the transport consequences if the commercial arrangements for the carriage of freight by rail are not concluded, or are not performed to the level assumed, including the effect on your forecasts and on your conclusions;
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 1.2.
DCC / NZTA	Accept the information provided in Appendix 2.

Q1(c)	forecast heavy vehicle volumes on SH87 and SH88 under a no-transfer case, a low case and a high case, so that the Panel can see the range within which the assessed effects and the claimed benefits sit;
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 1.3.
DCC / NZTA	Accept the information provided in Appendix 2.
Q1(d)	a single reconciled statement of the transport benefits relied upon, showing the derivation of each and the year and network to which it relates, reconciling in particular the approximately 19,000 truck movements at paragraph 4.1(f) of Mr Driver's evidence with the 15,000 one-way movements adopted by ORC, and identifying the source and basis of the forecast 70% CO2e saving if it does not derive from your assessment; and
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 1.4.
DCC / NZTA	Accept the information provided in Appendix 2.
Q1(e)	the extent to which the claimed benefit is additional to the transfer already being achieved, or capable of being achieved, using spare capacity on existing services as described at s2.3.2 of the ITA Addendum, and what that implies for the Project's benefits.
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 1.5.
DCC / NZTA	Accept the information provided in Appendix 2.

Issue 2 - Securing the benefits and mitigating environmental effects at the level assessed

Consider background of Minute 9 paragraphs [10]-[15].

For Chris Rossiter. If a cap on heavy vehicle movements is not accepted, the Panel wishes to understand what would give it comparable certainty that effects will not exceed those you have assessed. Please address:

Q2(a)	what distinguishes heavy vehicle movements from the rail movements capped by condition 59A, such that a comparable limit is said to be unworkable, addressing controllability, enforceability, and the treatment of traffic generated by parties other than the Applicant;
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 2.1
DCC	DCC accepts alternative mechanism for controlling effects if a cap is not applied.
NZTA	NZTA accepts that an alternative mechanism can be managed through a threshold with a trigger for additional assessment.
Q2(b)	what mechanism you support in place of a cap on movements or on the rail mode share, and why it provides equivalent assurance;

SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 2.2.
DCC / NZTA	Accept a monitoring condition.
Q2(c)	if the mechanism you support is monitoring, its components expressed in measurable terms, including the counts to be undertaken and their location (for example classified counts at the site entrance and on Dukes Road North), the survey interval, the period over which results are averaged, the reporting party and recipient, the trigger values, and the consequences that should follow an exceedance, including any requirement to reassess effects or implement further mitigation
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 2.3. Clarification: The threshold for assessment needs to account for both local movements within the industrial zone and movements on the wider network, Dukes Road North south of the industrial zone and SH87.
DCC / NZTA	Accept a threshold based on two-way movements, derived from a daily average and 260 working days, e.g. 55,000 HCV movements two-way per annum. Assessment of effects should address capacity of the road network and safety with a focus on SH87 / Dukes Road North intersection and Gordon Road. Condition wording to confirmed by the planning experts. NOTE: Scope and methodology will need to be agreed with NZTA / DCC in advance of preparing the report.
Q2(d)	whether you support a mechanism linking the commencement of Stages 2 and 3 to demonstrated rail throughput, or to observed volumes remaining within the assessed envelope, so that the staging of effects follows the staging of the offsetting benefit; and if not, how else the Panel should manage the risk that later stages proceed while the transfer does not eventuate.
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 2.4.
DCC / NZTA	Accept there is no need for any additional thresholds for intermediate stages.
	<u>Issue 3 - Reliability of the forecasts, the untenanted warehousing and the receiving environment</u> Consider background of Minute 9 paragraphs [16]-[24].
Q3.1	To Helen Chapman and Reese Martin (for DCC). Please identify the committed and reasonably foreseeable development in the Mosgiel catchment relevant to a cumulative assessment, including any development to which the MTCB may be referring, the traffic growth expected from it, and any modelling that would assist the cumulative assessment sought at Q3.2.
DCC	DCC has provided information in Appendix 3.

NZTA	For the Mosgiel Optimisation Improvements Business Case, the following rates of growth were adopted																		
	<table><tr><th>Location</th><th>Direction</th><th>2033</th><th>2038</th></tr><tr><td rowspan="2">SH87 (Zone 5)</td><td>Southbound</td><td>4.5%</td><td>7.8%</td></tr><tr><td>Northbound</td><td>4.3%</td><td>7.4%</td></tr><tr><td rowspan="2">SH1 West (Zone 10)</td><td>Eastbound</td><td>5.2%</td><td>8.9%</td></tr><tr><td>Westbound</td><td>3.0%</td><td>5.1%</td></tr></table>	Location	Direction	2033	2038	SH87 (Zone 5)	Southbound	4.5%	7.8%	Northbound	4.3%	7.4%	SH1 West (Zone 10)	Eastbound	5.2%	8.9%	Westbound	3.0%	5.1%
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SLPL	These growth forecasts have been incorporated into the Stantec Technical Response to Minute 9 which is attached as Appendix 2 (refer Section 3.3).																		
Q3.2	To <u>Chris Rossiter (for the Applicant)</u> . The Panel wishes to test the robustness of the forecasts. Please address																		
Q3.2(a)	the source and level of growth accounted for in your assessment, identifying the existing consented development, the plan-enabled development including vacant land in the Dukes Road Industrial Zone, and the traffic growth expected from each;																		
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 3.1.																		
DCC / NZTA	Accept the forecast rates used for the assessment.																		
Q3.2(b)	having regard to DCC’s response to Q3.1, what a full build-out year assessment of SH87 and the SH1/SH87 interchange would show, incorporating that growth together with the Project at Stage 3, and including the peak season;																		
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 3.2.																		
DCC / NZTA	NZTA has some additional commentary under Q3.3.																		
Q3.2(c)	the trip generation rate your forecasts imply, expressed in normalised terms per 100m² GFA per day, per container, or per another stated unit, and how that rate compares with observed rates at comparable large-format warehousing and intermodal facilities in New Zealand or elsewhere, identifying your comparators;																		
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 3.3.																		
DCC / NZTA	Accept the trip generation rates for the warehouse facilities.																		
Q3.2(d)	the unlet floor area at each stage, the trip generation you have assigned to it, and whether that assignment is an upper, central or lower estimate;																		

SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 3.4.
DCC / NZTA	Accept the development floor area assumptions.
Q3.2(e)	at least one alternative tenancy case that does not share the Dynes/Icon profile — for example an operator new to the region, or an operator whose catchment lies to the north or in Central Otago — and the resulting daily and peak-hour heavy vehicle volumes on SH87 and Dukes Road North;
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 3.5.
DCC / NZTA	Accept the tenancy scenarios presented by SLPL.
Q3.2(f)	whether any conclusion in your assessment changes under those alternative forecasts, identifying specifically whether the safety findings, the intersection findings, or the adequacy of the proposed conditions would alter; and
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 3.6.
DCC/NZTA	Accept that additional changes would not be required. The HCV Movement threshold accepted in Q2(c) will create a trigger for further assessment.
Q3.2 (g)	your confidence in the Stage 3 forecasts expressed as a range, and if you are unable to express a range, how the Panel should allow for that uncertainty under Policy 6.2.3.9(a).
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 3.7.
DCC / NZTA	Accept the technical response.
Q3.3	To Kelly Blackie and Roy Johnston (for NZTA). In your opinion, does the SH1/SH87 interchange have capacity for the Project's traffic under the forecast scenarios, together with anticipated background growth over the staging period?

NZTA	The SH1 off ramp at the Quarry Road roundabout and the SH87/Gladstone Road intersection are currently operating at a poor level of service, LOS E, during the PM peak period. Recent modelling using the Mosgiel Microsimulation Model (MMM) indicates that this reduces to LOS F in the base model by 2033. The model includes background SH volume growth and known and likely developments within the Mosgiel township including the SLPL, Longfield Development and Summerset retirement village. Reducing levels of service over the staging period cannot be directly attributed to this Project as it reflects that several developments are likely to occur. In the AM period level of service deteriorates from LOS C to LOS F at one intersection in 2038, and in the interpeak level of service remains at an acceptable level at the end of the project staging (2038). NZTA is currently investigating options to optimise the corridor from the SH1 off ramp to the north of the SH87/Haggart Alexander Drive intersection to improve travel time reliability and reduce delays in peak periods over the short-medium term (5-15 years). Future project phases are subject to funding availability, prioritisation and approval within the National Land Transport Programme.
SLPL	SLPL acknowledges the capacity constraints on the entry to Mosgiel from SH1, particularly in the evening peak and accepts NZTA's position that performance changes cannot be directly attributed to the Project. The SLIP traffic generation will generate only a small proportion of the overall traffic growth in daily volumes on SH87.
<u>Issue 4 - Road safety effects on SH87 (Gordon Road) through central Mosgiel</u> Consider background of Minute 9 paragraphs [25]-[30].	
Q4.1	To <u>Chris Rossiter (for the Applicant)</u>. The Panel seeks an assessment of the effect the Applicant identifies as the primary adverse effect of the Project. Please address:
Q4.1(a)	a Safe System assessment for the with-Project case at Stage 3, including the peak season, extending Appendix B to the ITA Addendum, and identifying whether any corridor section changes score, risk band or indicated treatment; and please state what period you have adopted as the peak season and the volumes associated with it;
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 4.1
DCC / NZTA	Accept the assessment in the technical memo. NZTA accept that the Safe System Assessment risk rating will not change due to the low changes in traffic volumes generated by the Project.
Q4.1(b)	the with-Project risk rating for vulnerable road users on Gordon Road through central Mosgiel, paragraph 5.5(c) of your evidence having given the existing rating as moderate; and the percentage increase in heavy vehicles on Gordon Road at each Stage, on your own figures and stating the movement convention adopted;
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 4.2

DCC	Not qualified to comment on crash modelling and instead defer to NZTA.
NZTA	NZTA has not been able to assess the vulnerable user impact using predictive crash models due to a lack of available data. NZTA has reviewed CAS for the 2021 -2025 period and calculated a collective crash risk for 3 relevant pedestrians crashes. Based on this, the crash risk for vulnerable users is low and should remain low given the low change in overall volumes of HCV generated by the Project.
Q4.1(c)	the change in mid-block crash risk, as distinct from risk at intersections;
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 4.3.
DCC	Not qualified to comment on crash modelling and instead defer to NZTA.
NZTA	NZTA accepts that there is likely to be a small increase in the mid-block crashes because of the growth resulting from the Project, other developments and from background traffic. This is expected to be within acceptable limits based on information in the technical response.
Q4.1(d)	a quantified crash prediction assessment for Gordon Road and the SH87/Dukes Road North intersection, existing versus each Stage, using the NZTA Crash Estimation Compendium or an equivalent method; or, if such an assessment cannot be undertaken, the reasons why;
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 4.4.
DCC	Not qualified to comment on crash modelling and instead defer to NZTA.
NZTA	NZTA accepts the information in the technical response which indicates that the growth in predicated crashes will be low. NZTA normally rates safety performance of intersections using collective risk. Currently this intersection is rated as low collective risk. NZTA practice would be to monitor and respond if a problem develops.
Q4.1(e)	the interaction between the forecast heavy vehicle movements and concentrations of vulnerable users between SH1 and the site entrance, identifying school bus routes and stops, pedestrian crossing facilities on Gordon Road, and rail crossings, and the effect of the Project at each; and
SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 4.5.
DCC	Defer to NZTA.
NZTA	Accepts the response provided in the technical response.
Q4.1(f)	given your support for a reduced speed limit, your acknowledgement of out-of-context curve geometry, and your acceptance that a speed reduction sits outside this process and may not be achieved, what mitigation of the identified safety effects is available within the consent itself.

SLPL	This is addressed in the Stantec Technical Response to Minute 9 which is attached as Appendix 2. Refer Section 4.6.																		
DCC	Defer to NZTA.																		
NZTA	NZTA does not consider speed changes are required, and no safety improvements would be expected given the safety performance at this location.																		
Q4.2	To Kelly Blackie and Roy Johnston (for NZTA). Does NZTA have a view on the safety effects of the forecast heavy vehicle increase along Gordon Road through the town centre itself, particularly for vulnerable users, as distinct from the intersection matters addressed in its comment?																		
NZTA	The SH87 One Network Framework (ONF) classification through Mosgiel changes as the function of the route changes. <table><tr><th>Classification</th><th>Start</th><th>End</th></tr><tr><td>Urban Connector</td><td>SH1 Off-ramp</td><td>Ayr Street</td></tr><tr><td>Main Street</td><td>Ayr Street</td><td>Bush Road</td></tr><tr><td>Activity Street</td><td>Bush Road</td><td>Tay Street</td></tr><tr><td>Urban Connector</td><td>Tay Street</td><td>Eden Street</td></tr><tr><td>Rural Connector</td><td>Eden Street</td><td>Dukes Road</td></tr></table> The main shopping area is classified as main street and activity street recognising its importance in both movement and place. SH87 is a key public transport and walking route and is an HPMV route. NZTA has not been able to calculate predicted crash rates for vulnerable users due to the lack of available vulnerable user data. Based on the information provided in the SLPL technical response and a calculated collective risk for pedestrians which resulted in a low-risk rating, NZTA is of the opinion that there will be some crash rate growth because of the increased volumes but expects this would be low and unlikely to affect the current safety performance rating as measured by collective risk.	Classification	Start	End	Urban Connector	SH1 Off-ramp	Ayr Street	Main Street	Ayr Street	Bush Road	Activity Street	Bush Road	Tay Street	Urban Connector	Tay Street	Eden Street	Rural Connector	Eden Street	Dukes Road
Classification	Start	End																	
Urban Connector	SH1 Off-ramp	Ayr Street																	
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Activity Street	Bush Road	Tay Street																	
Urban Connector	Tay Street	Eden Street																	
Rural Connector	Eden Street	Dukes Road																	
DCC	Defer to NZTA.																		
SLPL	Accepts NZTA position.																		
<u>Issue 5 - The SH87 / Dukes Road North intersection and the next intervention</u> Consider background of Minute 9 paragraphs [31]-[36].																			
To Kelly Blackie and Roy Johnston (for NZTA). The Panel wishes to understand NZTA’s position on the adequacy of the agreed works and on what follows them. Please address																			
Q5(a)	whether you confirm the agreement recorded at paragraph 3.2 of Mr Rossiter’s evidence and in the covering legal submissions, including that the existing taper is acceptable to achieve a safe outcome, and whether in your view the agreed works resolve the risk you identified or defer it;																		
NZTA	Based on the projected HCV volumes and SIDRA modelling undertaken by the applicant, NZTA accepts the agreed works to lengthen the right turn bay resolves the safety issues related to right turning trucks from the highway.																		
SLPL	Accepts NZTA position.																		

Q5(b)	the design vehicle the agreed 20m by 3.5m bay is intended to accommodate, the Panel's understanding being that it provides storage for a single maximum-length heavy vehicle rather than the turning ability for the "quad semi or articulated vehicle" sought in your comment;
NZTA	The turning ability of trucks at the intersection is not about a concern given trucks already use the intersection. The concern related to storage capacity of the right turn bay will be addressed by the proposed lengthening of the right turn bay.
SLPL	Accepts NZTA position.
Q5(c)	whether a bay of that length is adequate on the forecast heavy and light vehicle demand, including any sensitivity cases produced in response to this Minute;
NZTA	SIDRA modelling undertaken shows that the turning bay length is adequate for heavy and light vehicles using the expected demand. NZTA have not received testing results for sensitivity scenarios but would expect these would be adequate due to low opposing traffic volumes on SH87 and the low expected queue length in the expected case.
SLPL	It is confirmed that the SIDRA modelling has been based on peak hour HCV volumes of 30 vehicles per hour two-way in and out of Dukes Road North. This level was adopted to provide a conservative assessment of queue lengths and would be representative of daily HCV volumes in the range 250 to 300 HCV per day. This exceeds what is anticipated to be generated by the SLIP.
Q5(d)	what approval, design acceptance, road safety audit, completion and as-built steps the conditions should require, noting that condition 75A presently contains none;
NZTA	NZTA would require the final marking plan to be submitted for approval by NZTA prior to works being undertaken. The applicant would need to get an approved temporary traffic management plan and corridor access (CAR) approval to undertake the work. For minor works of this nature, NZTA would not require a safety audit. Also the CAR process enables NZTA to manage any quality issues and as built requirements.
SLPL	Accepts the NZTA approval processes.
Q5(e)	at what point, expressed as turning volume, queue length, crash risk or another measurable threshold, a more substantial treatment such as an upgraded channelised priority intersection or a roundabout becomes warranted, and whether you consider that threshold is reached at any stage of the Project, including for anticipated background growth;
NZTA	Transport modelling using the Mosgiel Microsimulation Model undertaken as part of NZTA's SH1/87 Optimisation proposal has not identified any capacity constraints at the intersection over the Project staging period. This is based on the HCV volumes on SH87 from the applicants ITA. NZTA have reviewed the applicants SIDRA modelling and are comfortable that the intersection's capacity is not constrained at the end of the Project staging. This is based on the understanding that the 2033 test uses background growth expected in 2038 and includes full development (Stage 3) of SLPL. From a safety perspective the need for upgrade to a roundabout would be triggered by a change in the intersection collective risk rating. There would need to be a change in collective risk from the current low risk rating to at least medium or medium-high risk rating, which is not predicted to change in response to the Project.
SLPL	Accepts NZTA position.
Q5(e)(i)	if that threshold is reached, who would fund and deliver the improvement, given that no project is in your forward programme and that the works may require land outside the road reserve; and
NZTA	There are two options for funding of any work, NZTA or a developer. NZTA would need to create a project in the forward works programme and deliver the work with multi-party funding.
SLPL	Accepts NZTA position, noting the mechanism to address changes is provided by the monitoring condition reported at Q2(c).

Q5(e)(ii)	to what extent the need for the upgrade is attributable to the Project as opposed to existing conditions or cumulative growth, and how apportionment should be approached, having regard to the acceptance at paragraph 3.1 of Mr Rossiter's evidence that improvements are desirable regardless of whether the Project proceeds; and
NZTA	Based on the reference to 3.1 of Mr Rossiter's evidence NZTA understand this question relates to the right turn bay improvement which SLPL has agreed to fund. It is NZTA understanding that any other improvements such a roundabout would be dependent on any outcome from further assessment arising from a monitoring condition.
SLPL	Accepts NZTA position.
Q5(f)	whether NZTA maintains the request at paragraph 2.8 of its comment for a condition capping heavy commercial vehicle movements, and if a cap is not imposed, what alternative mechanism NZTA would support.
NZTA	NZTA have discussed this and agreed with other parties that a review condition would be appropriate.
SLPL	Agree with NZTA.
<u>Issue 6 - DCC's conclusion of acceptability and the wider network improvements</u> See Minute 9 paragraph [37] – [43].	
Q6	To <u>Helen Chapman and Reese Martin (for DCC)</u>. The Panel wishes to understand the basis and the durability of DCC's conclusion that the transport effects are acceptable. Please address:
Q6(a)	how you reconcile your advice that the additional movements will have a noticeable impact on the wider transport network with the conclusion that adverse impacts are unlikely, that is, whether the impact is noticeable but not adverse, or adverse but adequately managed by the recommended conditions;
DCC	Reference to Paragraphs 20-22 in Appendix 3. DCC consider that the SLIP will have a noticeable impact through an increased presence and visibility of heavy vehicle movements travelling along Gordon Road/State Highway 87 (SH87) and Dukes Road North on both a daily and annual basis. However, this is consistent with the function of these roads as High Productivity Motor Vehicle (HPMV) routes and in isolation, additional light and heavy vehicle movements are unlikely to have any adverse safety or efficiency impacts, subject to recommended conditions to manage local roading impacts along Dukes Road North, as referred to at Q6(b)(ii).
SLPL	Agree with DCC that the scale of Project generated traffic will not present safety or efficiency impacts.
Q6(b)	which recommended condition addresses the effect on SH87 through central Mosgiel, as distinct from Dukes Road North and the site access, and if none does, on what basis that effect is concluded to be acceptable, addressing in particular (i) whether the capital works programme from which development contributions derive presently includes works directed at mitigating the Project's effects on the road network, and if not, by what process and timeframe they would be added, when contributions from the Project would become available, and whether that timing is expected to align with the staging of effects;

DCC	Reference Paragraph 23 in Appendix 3. None of the DCC recommended conditions directly address any effects of the proposal on SH87 as DCC is not the Road Controlling Authority (RCA) and cannot impose such conditions. Reference Paragraphs 24-28 in Appendix 3. The current DCC capital works programme on which the Development Contribution (DC) funded proportions are calculated from includes projects focused on addressing transport improvements in Mosgiel. However these do not include works specifically targeted to mitigate effects generated by the SLIP. DCC is working alongside NZTA's SH87/SH1 optimisation investment case on a strategic transport study in Mosgiel/North Taieri to identify current challenges, forecast growth and possible interventions. These findings are expected to be presented to Council in October 2026 with capital interventions proposed into the 2027-2037 Long Term Plan (LTP). Any inclusion of capital projects is subject to a final decision by Council. Therefore, what these interventions will be, if they are funded, when they are delivered, and when DCs are available is uncertain. That being said, there is a broad need for investment in Mosgiel responding to growth.
SLPL	Given the development time frame for the SLIP, SLPL considers that there is sufficient time for DCC to include projects in the LTP to address transport effects associated with approved and planned growth. The Project's DCs can contribute funding to future improvements. On that basis, SLPL does not consider that there is a need for conditions to address effects on the DCC transport network beyond the SLIP frontage to Dukes Road North.
Q6(b)(ii)	where the line should be drawn between applicant-funded works and growth-related works for the Project, and whether it would assist DCC for that boundary to be addressed expressly in conditions; and
DCC	Reference Paragraphs 29-31 in Appendix 3. The applicant should be responsible for fully funding road improvements along the Dukes Road frontage to the SLIP (between Stedman Road and the SLIP entrance) that can be directly attributed to the development and are otherwise unplanned for. This includes any specific areas where the Project results in clearly identifiable impacts that need to be addressed by the applicant. DCC consider that wider growth related impacts are more appropriately funded through DC's and delivered by Council through the LTP capital works programme.
SLPL	Accepts the Applicant will be responsible for all works associated the new Site access and related tie-in changes on Dukes Road North. Given the development time frame for the SLIP, SLPL considers that there is sufficient time for DCC to include projects in the LTP to address transport effects associated with approved and planned growth. The Project's DCs can contribute funding to future improvements. On that basis, SLPL does not consider that there is a need for conditions to address effects on the DCC transport network beyond the SLIP frontage to Dukes Road North.
Q6(b)(iii)	whether your conclusion that the transport effects are acceptable would hold if the wider network improvements you rely on were not funded, programmed or delivered within the Project's staging timeframe, and how Policy 6.2.3.9(b) would be satisfied in that event; and
DCC	Reference Paragraphs 32-44 in Appendix 3. DCC agree that existing road widths along Dukes Road North are likely to be adequate to accommodate HPMVs other than the areas of road widening required to accommodate a right turn bay. DCC have remaining concerns around how the project will be consistent with and satisfy Policy 6.2.3.9(b) for the following reasons: The section of Dukes Road North between Stedman Road and Puddle Alley/the proposed SLIP entrance accommodates a comparatively lower number of heavy vehicle movements compared

to Dukes Road North west of Stedman Road (1,830 vehicles per day between SH87 and Carncross Street with 8.9% heavies in 2026, 2,208 vehicles per day between Carncross Street and Stedman Road with 4.5% heavies in 2026, and 1,358 vehicles per day east of Stedman Road to Puddle Alley with 1.9% heavies in 2022 based on current RAMM count data).

Notwithstanding that Dukes Road North between SH87 and Puddle Alley is defined as an HPMV route, DCC have concerns around the impact the expected increased heavy vehicle movements will have on the current Dukes Road North pavement between Stedman Road and the SLIP entrance based on recent existing non-compliant pavement deflection results that will be continually monitored at this stage. It's difficult to anticipate what impact growth from the development of vacant industrial land along Dukes Road North will have on Dukes Road North east of Stedman Road and the timing of this, however the most recent traffic counts suggest a current trend that the origin and destination of heavy vehicles is mostly reliant on travelling to and from SH87.

DCC currently has no planned upgrades or pavement renewals for this section of road identified in its current capital works programme while the section of Dukes Road North between SH87 and 95 Dukes Road North is scheduled for resealing in the 2026/2027 financial year. It should be acknowledged that the proposed SLIP site is currently zoned rural under the Second Generation District Plan (2GP) and therefore there would be an expectation/anticipation that the use of this land does not result in a large number of frequent daily/annual heavy vehicle movements.

An additional 200-250 heavy vehicle movements in addition to the existing 27 heavy vehicle movements (most recent 2022 traffic count) along this section of road are likely to have a noticeable impact on the longevity of the pavement, exacerbate this current deflection issue, and result in increased maintenance requirements, and accelerate the need for pavement rehabilitation, requiring additional unplanned funding that may otherwise be unaffordable to the public in the long term. This will also result in a major shift in the proportion of heavy vehicles using this section of road which is otherwise comprised of mostly light vehicle movements. On that basis, we do not consider that a cost sharing agreement is an appropriate approach to manage this effect in this instance and DCC recommends the applicant as a condition of consent should be required to fully fund pavement upgrades to this section of local road as part of the wider improvements to Dukes Road North.

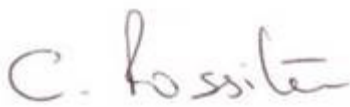
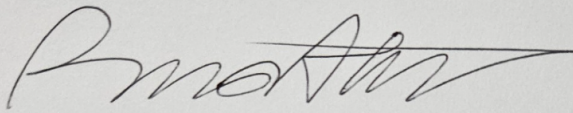
The applicant has not committed to undertaking a Level Crossing Safety Impact Assessment or considering any necessary improvements to the Dukes Road North railway level crossing as part of the new Dukes Road North footpath. The result of this is increased exposure and potential risk for conflict between light and heavy vehicles and staff travelling to the site via alternative travel modes due to relying on the carriageway to cross the railway line. We are unclear on KiwiRail's position of this aspect of the project as the controlling authority. We seek a clear binding commitment/agreement from the applicant that they will work with DCC and Kiwirail to fund and construct improvements.

The applicant has clarified that the proposed footpath to be constructed along the site's Dukes Road North frontage will be wholly formed within private property and not vested to Council. It must be acknowledged that this will trigger the requirement for a Section 348 application under the Local Government Act 1974 for a right of way easement in gross in favour of DCC to protect public access and access for maintenance. Otherwise the benefits of this footpath extension may be more limited. We are still of the view that a boundary adjustment to adjust the location of the road reserve to include the footpath would be appropriate to clarify ownership and maintenance.

The applicant has rejected the requirement for certification and testing conditions for any proposed changes to the DCC controlled Local road (Dukes Road North). This creates the risk that without DCC oversight, it may result in the construction and vesting of infrastructure that is

	inappropriate and may result in an increased maintenance burden and long-term affordability concerns.
SLPL	SLPL acknowledges the concern about the pavement condition of Dukes Road North and would seek for this to be addressed prior to SLIP becoming operational to avoid disruption to movements to or from the SLIP. Given that the road forms part of the designated HPMV road network and that its maintenance would normally be funded through DCs, SLPL does not consider that it should be responsible for fully funding any upgrade and that a cost share agreement would be more appropriate. SLPL also note DCC's recording that the pavement condition is already non-compliant. SLPL has agreed to form a footpath along its frontage to Dukes Road North as far as the railway crossing. It is willing to work with DCC and KiwiRail on the connection across the railway to Stedman Road.
Q6(c)	whether DCC seeks a traffic monitoring, reporting or review condition of the kind discussed under Issue 2, and if so in what terms.
DCC	Reference Paragraph 45 in Appendix 3. DCC support the use of a traffic monitoring, reporting, and review condition to better understand actual vehicle movements on an annual basis. A realistic trigger threshold has been agreed at 55,000 two-way HCV movements at the site entrance. If this threshold is exceeded, additional safety and capacity assessment must be undertaken by the applicant to any additional mitigation measures that may need to be implemented.
SLPL	Accepts the monitoring condition as set out at Q2(c).

Signed:

Witness	Signature	Date
Chris Rossiter		7 September 2026
Mark Georgeson		7 September 2026
Helen Chapman		8 September
Reese Martin		7 September 2026
Kelly Blackie		7 September 2026
Roy Johnston		8 September 2026