Response ID ANON-URZ4-5FQQ-J

Submitted to Fast-track approval applications
Submitted on 2024-05-03 14:41:22

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
Southern Edge Hub Farms Limited

2 Contact person

Contact person name:
Peter Dynes

3 What is your job title

Job title:
Managing Director

4 What is your contact email address?

Email:
s 9(2)(a)

5 What is your phone number?

Phone number:
s 9(2)(a)

6 What is your postal address?

Postal address:

s 9(2)(a)

7 Is your address for service different from your postal address?

Yes

Organisation:
Gallaway Cook Allan, Lawyers

Contact person:
Bridget Irving / Phil Page

Phone number:
s 9(2)(a)

Email address:
s 9(2)(a)

Job title:
Partner

Please enter your service address:

Level 2
123 Vogel Street,
Dunedin 9013

Please add additional emai s 9(2)(a)

Section 1: Project location

Site address or location

Add the address or describe the location:

270-292 Dukes Road North

Adjacent to the Taieri Branch railway line corner of Stedman Road and Dukes Road North, Taieri Plain, Mosgiel.

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Do you have a current copy of the relevant Record(s) of Title?

Yes

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Records of Title - Southern Edge Hub Farms Ltd 3472-0599-0444 v.1.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

Southern Edge Hub Farms Limited

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

Owner

Section 2: Project details

What is the project name?

Please write your answer here:
Southern Link Logistics Hub

What is the project summary?

Please write your answer here:

A comprehensive logistics and freight hub including:
- Rail siding with rail freight shuttle service to Port Chalmers.
- Truck depot.
- Onsite goods handling and warehousing.
- Shipping container receipt, maintenance, storage, loading, and dispatch facilities.
- Break bulk yard.
- MPI and customs-compliant handling of import and export goods from the lower South Island to/from Port Otago.
- Space for future log marshalling area.

What are the project details?

Please write your answer here:

The Southern Link Logistics Hub is an initiative by Dynes Transport Tapanui Limited and Port Otago Limited with support from KiwiRail to create a world-class logistics and freight hub designed to transform Otago's transport, logistics and supply chain infrastructure.

Southern Edge Hub Farms Limited is a special purpose vehicle incorporated to hold, develop, and operate the Southern Link Logistics Hub in conjunction with Port Otago Limited.

After an extensive search for an appropriate site to support Port Otago Limited's operations at Port Chalmers, a site adjacent to the Taieri Branch rail line and Fonterra's warehouse and distribution site on Dukes Road North was secured.

It offers the following unique combination of essential qualities:

- It is adjacent to Fonterra's existing facility and other land owned by Port Otago Limited. There is an existing critical mass of export freight.

- It has direct frontage to existing rail infrastructure with space to create a new dedicated siding.
- It is far enough from the Dunedin City urban area to achieve the goal of taking trucks off urban roads within the City.
- It is close enough to Port Chalmers (27km by rail) to enable a rail shuttle service to deliver containerised cargo to Port Otago to meet shipping schedules on a "just in time" basis with acceptable security. That feature reduces the need for additional wharf-side container marshalling space at Port Chalmers and improves the efficiency of Port Otago.
- The rail corridor between the site and Port Chalmers can accommodate the increased rail traffic without substantial upgrades.
- It is large enough to accommodate likely export volume growth for the next 50 years.
- Natural hazard risk is either acceptable or can be readily accommodated through engineering design.
- It does not have immediately adjacent residential neighbours and so reverse sensitivity risk is low.
- There are no known locations of cultural, archaeological, or ecological significance on the site.

The applicant has been unable to identify another site with these qualities.

The site is perfectly located to facilitate mode shift from road to rail for the majority of freight to Port Otago. The Logistics Hub will include onsite warehousing, container facilities including storage and maintenance depot, break bulk yard and space for future log marshalling. The site will be MPI and customs compliant to enabling handling of both import and export goods. Development of the site will include earthworks, establishment of rail sidings, site access, internal roadways and hardstand areas, buildings for storage, administration and maintenance facilities and associated infrastructure including systems to manage stormwater.

The utilisation of the Logistics Park will significantly improve the operational efficiency of Port Otago's Port Chalmers facility which faces significant pressure for space portside. It will also result in significant reductions in carbon emissions and road maintenance costs associated with heavy vehicle movements to Port. The mode shift from road to rail facilitated by this development will reduce congestion within Dunedin City, improving efficiency of the City's road network and reducing adverse impacts that large volumes of heavy traffic have on this. It will also increase the resilience to supply chain disruption during adverse weather events or global events such as the Covid-19 pandemic.

The development of the Freight Hub will provide an opportunity for further mode shift of freight currently transported from Southland to Port Otago and import freight into Central Otago. This would result in significant savings for freight producers and road controlling authorities.

It is intended to utilise extensive roof space to establish a large solar array to generate much of the electricity for the site. Onsite equipment will also be electric where possible and will employ state of the art artificial intelligence to operate the site, improving efficiency and reducing safety risks.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

Stage 1 – establishment of the site with an initial 15,000m2 of warehousing and 6000-12000m2 of container storage, construction of the rail siding and associated administration, maintenance and worker facilities and 3 waters infrastructure to serve the site – Years 1-5

Stage 2 – further 15,000m2 of warehousing and 6000-12000m2 of container storage. Years 5-10

There is also adequate space available for further future stages beyond this should freight demand justify it. These are identified as future stages on the indicative layout plan.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource Management Act 1991
The project will require authorisations under the Resource Management Act 1991 ("RMA"). While the full suite of consents required cannot be finalised until the detailed design is completed, it is anticipated that the following resource consents / statutory approvals will be required from the relevant local authorities as set out below.

Otago Regional Council
- Land use consents for soil disturbance activities;
- Water permits for the diversion of water; and
- Discharge permits for the discharge of water and contaminants into land and / or water.

Dunedin City Council
- Land use consents for construction activities including earthworks, land disturbance, construction noise, lighting and traffic; and
- Land use consents to construct, operate and maintain a freight logistics facility including physical structures and buildings, associated infrastructure and ancillary facilities.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Dunedin City Council

Otago Regional Council

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

Nil

Is approval required for the project by someone other than the applicant?

Yes

Please explain your answer here:

Approvals will be required from Kiwirail with respect to designations that it holds as a requiring authority Kiwirail's written approval is required for works within the rail corridor (designation 420- Taieri Branch Railway line).
Depending on the flood hazard and stormwater management solution adopted Otago Regional Council's written approval may be required for any works required in relation to designation 218- East Taieri Drainage Scheme.
Depending on the stormwater design adopted approval may be required from the ORC under the Flood Management Bylaw.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

detailed design – 6month post approval

procurement – In parallel with detailed design

funding – in parallel with detailed design. The project will be funded by shareholders.

site works commencement – Site preparation works will commence to the extent possible as soon as approvals are obtained and any conditions precedent satisfied.

completion. –

Stage 1 – 12-18 months post approval

Stage 2 - 5-10 years post approval

Future potential stages 10yrs + post approval

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Dunedin City Council
Otago Regional Council
Kiwirail
NZTA
Aukaha
Aurora Energy Limited

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

The project has been introduced to Dunedin City Council and Otago Regional Council, including via a submission in relation to the Future Development Strategy. Design work has commenced and further consultation with respect to the project will occur with the Councils, Waka Kotahi and Iwi. The Applicant intends to work with stakeholders throughout the application preparation process including engagement with respective advisors to ensure design solutions adopted to respond to the site's constraints are acceptable.

The applicant has been working closely with Kiwirail with respect to the establishment of new rail siding adjacent to the existing line and with respect to the operation of 'shuttle runs' from Port Otago to the Logistics Hub. Kiwirail have provided a letter confirming these discussions.

Once establishment of Stage 2 occurs the applicant has assessed some potential for heavy vehicle movements on SH87/Gordon Road through Mosgiel to increase marginally. The need for a Heavy Traffic bypass for Mosgiel has already been established as a result of existing traffic demands in the area, but the Applicant is willing to engage with DCC and NZTA on how this may be achieved.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

N/A

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

Ngāi Tahu Claims Settlement Act 1998:

Legislation was passed in 1998 that put into effect the terms and redress package agreed to by Ngāi Tahu and the Crown. The Ngāi Tahu Claims Settlement Act 1998 includes several mechanisms specifically designed to be used in implementing other legislation such as the Resource Management Act 1991 and Conservation Act 1987.

In summary the key elements of the Ngāi Tahu Settlement are:

- Apology: The Crown apologies unreservedly for the suffering and hardship caused to Ngāi Tahu;
- Aoraki/Mount Cook: gifting of Aoraki, co-management and renaming;
- Cultural redress: restoring effective kaitiakitanga;
- Non-tribal redress: providing a commitment to resolve claims by individuals that were heard by the Waitangi tribunal. These private claims are separate from the collective Ngāi Tahu Claim, Te Kerēme.
- Economic redress: to provide finance and mechanisms to give Ngāi Tahu the capacity to build tribal assets to generate funds for social and cultural development.

A significant component of the Ngāi Tahu Settlement is the elements of cultural redress, which seek to restore the ability of Ngāi Tahu to give effect to its kaitiaki responsibilities. These include:

- Ownership and control: pounamu, high country stations, specific sites and wāhi taonga;
- Mana recognition: Statutory Acknowledgements, Deeds of Recognition, Tōpuni, dual place names;
- Mahinga kai: Nohoanga, customary fisheries management, taonga species management; and
- Management Input: Statutory Advisors to DOC, dedicated memberships, Department of Conservation protocols, Resource Management Act implementation, and heritage protection review.

The proposed location for the Freight Hub is within the Taieri Plain, an area of cultural significance for Ngai Tahu Whanui. The Waihola/Waipori wetlands are identified as a Statutory Acknowledgement Area pursuant to the Ngai Tahu Claims Settlement Act. This wetland complex is approximately 20km from the proposed freight hub site. As such it will not be directly affected by the proposal. No Nohoanga exist in the vicinity of the site.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

No

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary:
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Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

Southern Edge Hub Farms is commissioning technical assessments to inform a comprehensive assessment of environmental effects of the project. While these assessments have not yet been completed, the following potential or actual adverse effects have been identified.

The potential effects on the environment associated with the Logistics Hub fall within two general categories: construction phase and operational phase. Construction phase effects are temporary and relate to activities involved with constructing the Logistics Hub and associated infrastructure, whereas operational phase effects arise from the operation, use and maintenance of the Logistics Hub.

FLOOD HAZARD
The site is identified as being subject to flood hazards, and a portion of the site forms part of the North Taieri floodway. Southern Edge Hub Farms has commenced investigations into engineering solutions that will appropriately manage storm water and flood risk to avoid increasing the risk of flooding and adverse effects beyond the boundary. These engineering solutions will underpin the final site layout and design and will seek to achieve a hydrologically neutral outcome between pre and post development.

The Applicant is committed to working closely with the Otago Regional Council on a final design that ensures the integrity of the North Taieri Flood Protection Scheme, while utilising the attributes of the site that make it uniquely suitable for the development of a Logistics Hub.

TRANSPORT RELATED EFFECTS
Traffic impacts on the local roading network are expected during both the construction and operational phases of the project. The purpose of the Logistics Hub is to facilitate a road to rail mode shift for freight movement to Port Otago. From a freight movement perspective, it is anticipated that Stage 1 of the project will be heavy traffic neutral. This is due to the reduction in heavy traffic movements to Port Otago associated with the rail movements that will be carrying freight and increasing use of curtainsider trucks which are capable of carrying a higher payload than container trucks. Beyond Stage 1 (years 5-10) it is predicted that there will potentially be a marginal increase in traffic movements as the volume of freight arriving at the site grows. Although, this is not guaranteed as there are further opportunities to move more freight onto rail when coming to the site.

The Applicant will be working with the Dunedin City Council (“DCC”) and Waka Kotahi NZ Transport Agency (“NZTA”) to investigate and assess the feasibility of creating a heavy traffic bypass so that these movements can be removed from Gordon Road (State Highway 87) through Mosgiel. Having said that, Gordon Road is a State Highway and as such, is currently managed to provide for heavy vehicles.

Southern Edge Hub Farms has engaged a technical expert to model the predicted transportation related effects of the Logistics Hub on both the local area and Dunedin City as a whole. The Transportation Assessment will also identify other mitigation methods, such as timing traffic movements to the site outside of peak traffic periods, which will help inform the development of site Traffic Management Plans for both the construction and operational phases.

While later stages of the project may result in marginal increases in traffic on State Highway 87 to the site and its immediate surrounds, the project will also have the positive effect of removing heavy vehicle traffic from State Highways 1 and 88 through urban Dunedin (between Mosgiel and Port Chalmers).

LANDSCAPE AND AMENITY
The development of the Logistics Hub will require the construction of large warehouses, container marshalling yards and new transport infrastructure, such as rail sidings and site access points. Containers will be stored on site once the Logistics Hub is operational, and operating machinery and truck movements will also likely be visible from the road and nearby properties.

The site is currently in pasture and is not identified as holding any significant landscape values. The surrounding area is largely industrial and agricultural in nature, with some lifestyle properties nearby. The site is directly adjacent to the North Taieri Industrial Area and existing rail line. As such, it is expected that the Logistics Hub will appear as a logical extension to nearby industrial sites and transport infrastructure.

The detailed site design will incorporate recommendations from a Landscape and Amenity Assessment on ways to avoid or mitigate adverse effects on landscape and amenity values, including selection of building materials, siting of structures, landscaping, and screening plantings if appropriate.

LIGHTING
It is anticipated that the Logistics Hub will operate 24 hours per day and therefore will require lighting to ensure operational safety overnight. Site layout and design will seek (where practical) to use buildings and structures to provide screening from outside the property.

A Lighting Assessment will be undertaken, and the recommendations used to design site lighting to mitigate lighting and glare effects on the environment and nearby properties, whilst also ensuring the site can be safely operated. The Applicant will consult with the operators of the nearby Taieri Aerodrome and Dunedin International Airport to ensure that lighting is designed in a way that will not impact the safe operations of those facilities.

NOISE
The construction and operation of the Logistics Hub will potentially generate noise that will be heard outside the boundary of the property.

Noise effects during the construction phase may be elevated but will be temporary in nature. It is anticipated the noise associated with construction will meet the Construction Noise Standards (NZS6803) and will occur during daytime hours (7.30am – 6.00pm).

Once operational, it is anticipated that Logistics Hub will operate 24 hours per day, 7 days per week. Operational noise effects will be associated with heavy vehicle movements (both on and offsite) and the loading and unloading of freight onsite. Site layout and design will seek (where practical) to use buildings and structures to mitigate the effects of noise at the boundary of the site. Onsite vehicles and machinery will (where possible) utilise electric motors, which will generate less noise. Trucks to the site will be required to utilise low frequency quackers (as opposed to reversing beepers). Noise will be managed by the development of a site Noise Management Plan and an ongoing monitoring program will be implemented.

While the site is not currently zoned for industrial use, it is adjacent to an industrial area, where elevated noise is currently anticipated and provided for via District Plan overlays.

Southern Edge Hub Farms has engaged a technical expert to model the potential noise effects of the Logistics Hub, during both the construction and operation phase. This assessment will be used to inform mitigation measures that may be required to reduce the impact of noise on nearby residential dwellings.

HIGHLY PRODUCTIVE LAND
The proposed site is located on highly productive land as defined in the National Policy Statement for Highly Productive Land ("NPS-HPL"). Whilst the proposal will remove this site from land-based primary production purposes, the development of a Logistic Hub on the site is considered to be a significantly more efficient and productive use of the site's unique locational features than land based primary production. This approach is consistent with the provisions of the NPS-HPL (discussed in more detail in Section 6 below).

Furthermore, it is proposed that during construction, topsoil will be removed and stockpiled and high-class soils will be relocated so they may be utilised elsewhere for productive purposes.

GENERAL CONSTRUCTION EFFECTS
In addition to the potential for increased traffic and noise effects during the construction phase (discussed above), it is anticipated that there may be other temporary construction effects such as dust emissions and the generation of sediment from earthworks. These effects, and others, will be managed by the development and implementation of a Construction Management Plan that includes dust suppression and sediment and erosion control measures.

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Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

Given the nature and location of the project, the following National Policy Statements are relevant:

- National Policy Statement for Freshwater Management ("NPS-FM");
- National Policy Statement for Urban Development ("NPS-UD");
- National Policy Statement for Highly Productive Land ("NPS-HPL"); and
- National Policy Statement for Renewable Electricity Generation ("NPS-REG").

Although a full assessment on these relevant statutory planning documents is yet to be completed, a general assessment of their relevance to the Logistics Hub is presented below.

NPS-FM
The NPS-FM provides direction on how freshwater should be managed under the Resource Management Act 1991. The objective of the NPS-FM is to ensure that natural and physical resources are managed in a way that prioritises:

- First, the health and wellbeing of water bodies and freshwater ecosystems;
- Second, the health needs of people; and
- Third, the ability of people and communities to provide for their social, economic and cultural wellbeing, now and in the future.

The project is consistent with the direction of the NPS-FW for the following reasons:

The potential effects of the proposal on the health of and wellbeing of water bodies and freshwater ecosystems relate primarily to potential effects from

sediment during construction. A site Construction Management Plan and erosion and sediment control measures will be used to ensure that the health of nearby waterbodies and freshwater ecosystems is protected during construction.

The site will be designed so that it can appropriately manage floodwaters and will capture and treat stormwater generated on site. It is considered that these measures will ensure that the health of nearby waterbodies and freshwater ecosystems and the health needs of people are protected once the Logistics Hub becomes operational.

Effectively managing the flood hazard risk, and stormwater requirements of the proposed site (described in Section 5) will enable the development of a Logistics Hub, which will help provide for the wellbeing of people now and in the future. This is because the Logistic Hub will play a pivotal role in shifting freight from road to rail, reducing heavy truck movements between Mosgiel and Port Chalmers and reducing transport emissions in the medium to long term.

NPS-UD
The NPS-UD sets out the objectives and policies for planning for well-functioning urban environments under the Resource Management Act 1991. The primary objective of the NPS-UD is to ensure that New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Notably, this includes urban environments that support reductions in greenhouse gas emissions and are resilient to the effects of climate change.

The project is consistent with the direction of the NPS-UD for the following reasons:

The project will facilitate the mode shift of freight from road to rail and therefore reduce the volume of heavy traffic movements on roads. It is anticipated that this, along with more efficient freight movements, will lead to associated reductions in greenhouse emissions, in line with the objectives of the NPS-UD and other national, regional and district policy direction.

Reducing truck movements within Dunedin will result in decreased road maintenance requirements, decreased road congestion and improved road safety for State Highways 1 and 88, and local roads between Mosgiel and Port Chalmers;

The proposal is anticipated to significantly improve amenity within the city and reduce barriers to active transport modes, particularly from the Otago Peninsula to the city centre and from the city centre to Port Chalmers; and

The project will create employment opportunities near Mosgiel for local residents, particularly during the construction phase.

NPSHPL
The objective of the NPS-HPL is to protect highly productive land for use in land-based primary production, both now and for future generations. This policy is relevant to the proposed site, which is located on land use classification (“LUC") 1 and LUC2 highly productive land.

The project is not inconsistent with the direction of the NPS-HPL for the following reasons:

Clause 3.6(1) of the NPS-HPL provides a pathway for the urban rezoning of highly productive land if:

- It is required to provide sufficient development capacity to give effect to the NPS-UD; and

- there are no other reasonably practicable and feasible options for providing development capacity within the same locality and market; and

- the environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.

The Applicant has sought identification of the site as the potential location of a Logistic Hub within the Future Development Strategy for Dunedin City (“FDS”). This is because of the significance of a Logistics Hub for Dunedin in achieving the strategic directions of the FDS (which is prepared under the direction of the NPS-UD), and meeting the targets set within Dunedin City’s Zero Carbon Plan 2030. On 15 April 2024, the joint hearing panel released its decision on the Future Development Strategy for Dunedin City. The decision includes this project on the proposed site in the FDS. The site has been identified in the FDS because it possesses unique features necessary for a Logistic Hub including:

-- A sufficiently large flat area;
-- Proximity to transport infrastructure, particularly rail;
-- Proximity to other significant freight operators (namely Fonterra and existing Port Otago land); and
-- It is at an appropriate distance from Port Otago to enable shuttle runs to and from the Port utilising the automated line.

Furthermore, it is proposed that during construction, topsoil will be scrapped, and high-class soils will be relocated so they may be utilised for productive purposes.

Therefore, whilst the high-class soils won’t be used on site for land-based production, the proposal has addressed this matter in a way consistent with the provisions of the NPS-HPL.

NPS-REG
The NPS-REG seeks to enable sustainable management of renewable energy generation under the RMA. The applicant intends to utilise the extensive roof space to establish solar generation to provide for onsite activities. The site will also be connected to the local distribution network so that excess electricity can be provided to the wider network. This qualifies as small and community scale distributed electricity generation under the NPSREG.

Therefore, the project will increase renewable energy generation, in line with the objectives of the NPS-REG and broader national policy direction.

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Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

The proposal is a significant development that will inevitably garner interest from the community. There will inevitably be concerns raised by residents of the wider Taieri Plain with respect to amenity matters that are likely to result in any Council hearing process being long and expensive. This is despite the fact the site is located adjacent to the existing industrial area and rail line. Issues associated with the NPSUD and NPSHPL are important and could in the normal course require the Applicant to first seek a Plan Change, before seeking resource consents for the development itself. This would require two significant approval processes that would likely take 2-3 years to work through, potentially longer if there were Environment Court appeals.

The applicant considers that the effects of the proposal will all be capable of being appropriately managed through conditions of consent and engagement with other key stakeholders (namely Councils, NZTA and Kiwirail). Therefore, the fast track will provide a significantly more timely and cost efficient forum for obtaining the necessary approvals.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

The applicant has commenced preparation of the application documents. It is anticipated that these will take 6-8 months to complete. The applicant will engage with stakeholders throughout during the application preparation process and prior to lodgement. The applicant expects to be ready to make a substantive application by March 2025 allowing time for stakeholder input throughout the process. The application, whilst strategically significant does not raise novel effects, nor are there likely to be assessments required where significant uncertainty exists. On that basis the application is likely to be relatively straightforward to process.

As noted earlier the applicant filed submissions, seeking to include the site within the Future Development Strategy for Dunedin. The FDS Decision has been released and has agreed that the indicative area sought for a freight hub be identified within the FDS. As expected, the FDS also identifies the constraints that need to be worked through with respect to the facility (such as hazards, infrastructure etc). On this basis the applicant expects to work with DCC and ORC to address the practical issues associated with the site in a collaborative way. This will improve the efficiency of processing of the applications.

Has the project been identified as a priority project in a:

Not Answered

Please explain your answer here:

CENTRAL GOVERNMENT PLAN

The Emissions Reduction Plan for New Zealand includes the following targets relevant to this proposal for the logistics park:

The need for the Planning and Infrastructure system to improvements to interregional rail serves, more on-demand public transport services in provincial towns and the decarbonisation of freight.

- Transport Target 3 – Reduce emissions from freight transport by 35% by 2035.
- Transport Target 4 – Reduce emissions intensity of transport fuel by 10 per cent by 2035.

These targets are supported by sector actions including:

- Supporting the freight sector to purchase zero and low emissions trucks
- Support the uptake of low-carbon fuels
- Improve the efficiency of heavy vehicles
- Continue to implement the New Zealand Rail Plan – which also has a focus on investment to support improved freight transport services.

Whilst this specific project is not identified, it is clear that it aligns with the targets set within the Emissions reduction plan.

LOCAL GOVERNMENT PLAN OR STRATEGY
Regional Land Transport Plan 2021-2031

The Regional Land Transport Plan 2021-2031 (Regional Transport Plan) identified freight journeys across the South Island as being a priority for the South Island Regional Transport Committee Chairs Group. The RLTP recognises:

- The changing expectations for freight movement and the potential for increasing use of rail and coastal shipping.
- The 'healthy streets' approach which seeks to encourage higher uptake of active transport modes reliant on safe and efficient pathways for these transport network users.
To this end the RLTP identifies the need for a Freight Hub/Logistics Park south of Dunedin, which would provide opportunities for freight movement north, south and west. This facility would be primarily focussed on containerised freight but could also serve as a container depot and potentially a site for staging commodities such as logs in the future. Work done to inform the RLTP indicates that a freight hub on the Taieri achieves a better outcome than one within Dunedin City's urban area.

Dunedin's integrated Transport Strategy 2013

Identified the potential for increasing use of the railway system to serve Port Chalmers. It also identified the severance issues that are created by the existing heavy traffic bypass. Addressing these matters requires an integrated response. In light of all this the transport strategy includes the following objective:

- Transport Objective 5 – Dunedin's transportation network provides for the efficient movement of people and goods.
This focus on freight noted the following:
Problem – Freight movement is vital for Dunedin's economic and social wellbeing. Dunedin is also a key freight hub for the wider region. Freight needs to be able to move efficiently and effectively to and from Port Otago and through the city, without adversely affecting the safety and amenity of the city.

Strategic Response – Encourage increased use of the rail network for freight movement and provide safe and efficient access for freight vehicles on designated routes.

Benefits –

- Increased proportion of freight being moved on the rail network.
- Efficiency of freight movement on designated freight routes is maintained and appropriate access is provided to support local economic activity.

Goal –
a significantly increased proportion of the total freight that passes through Dunedin will be being transported by rail by 2024.

Dunedin's Economic Development Strategy 2013-2023

An outcome of which is 'a thriving and diverse economy', which will be demonstrated through inter alia Dunedin's export growth exceeding the national average over 10 years. In order to achieve this outcome, the FDS acknowledges the need for the transport system to provide access to export opportunities. Freight movement is central to this, and to the provision of goods needed by the local economy.

Dunedin Infrastructure Strategy 2013 - identifies safe and efficient freight movement as a strategic priority for Dunedin's transport network.

Dunedin City Council Zero Carbon Plan 2030
Moving people and goods to, from and around Dunedin generates 34% of Ōtepoti Dunedin's gross emissions. In order to achieve the targets set by the Zero Carbon Plan for 2030 transport emissions need to be reduced by at least 425%. The Zero Carbon Plan identifies the following changes being required inter alia.
- Move a further 20% of road freight to rail.6
- Electrify 14% of the heavy vehicle fleet.
The Carbon Plan specifically addresses an inland port. The plan anticipates the following (amongst other things):
--Encouraging and supporting key stakeholders to establish an inland freight hub(s) – a new action.

OTHER
Port Otago is 100% owned by the Otago Regional Council. In 2024 the Regional Council issued Port Otago with a letter of expectations for the development of Port Otago's statement of corporate intent. One of the matters set out in the letter of expectations was the Council's continued emphasis on Port Otago developing a decarbonisation road map to reduce its carbon emissions. Development of the Freight Hub is a key initiative for Port Otago in achieving its decarbonisation goals.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

The Logistics Hub is unlikely to be formally recognised as 'regionally significant' in any planning documents. However, it will be primarily focused on serving Port Otago whose facilities are recognised as nationally significant. It will also utilise and support the efficient operation of the rail network and State highway Networks both of which are nationally significant.

The proposal will also include the development of community scale renewable energy generation which is recognised in the NPSREG as a matter of national significance.

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

Whilst not a housing development the project will contribute to a well-functioning urban environment by:

- increasing the provision of business land
- reducing traffic congestion, road safety risks and severance effects associated with heavy traffic travelling through Dunedin City. This will improve the efficiency of the transport network for other users and encourage greater uptake of active transport modes. This is a goal of the Dunedin City Future Development Strategy, which has been prepared to give effect to the NPSUD.
- Contributing to reduced carbon emissions from transport.
- Improving resilience of the supply chain to natural hazard events and other supply chain disruptions.

It is a strategically important project that supports the following strategic directions within the Future Development Strategy for Dunedin:
-- 4.6 - Ōtepoti Dunedin supports a diverse, sustainable and thriving urban economy
-- 4.7- Ōtepoti Dunedin has a thriving rural economy and local food production
-- 4.8 - Ōtepoti Dunedin is a compact and accessible city
-- 4.11 - Ōtepoti Dunedin has high-quality, safe, sustainable, efficient infrastructure and supports renewable energy.

The Hearing Panel for the Dunedin Future Development Strategy (prepared to give effect to the NPSUD) has recently released its decision and confirmed the appropriateness of identifying an area for the provision of a freight hub. The Future Development Strategy now includes the following Key Transport Priority:

"6.3.2.4 Investigation and establishment of an inland freight hub Freight transport is a significant issue for Dunedin. It is critical achieving a thriving urban and rural economy within the district and wider region. Current freight transport routes include the use of trucks to move freight to and from Port Chalmers and this has significant consequences in terms of road maintenance, safety and connectivity for active transport users within the City and high carbon emissions. Port Chalmers is space constrained meaning it has only limited capacity to increase freight volumes before further land reclamation would be necessary. Increasing the proportion of freight moved by rail would have significant benefits in terms of efficiency, reduced carbon emissions, road safety and amenity. Achieving this 'mode shift' requires a fundamental change to the way freight is handled within Dunedin. Establishment of an inland freight hub would enable Port Otago to relocate aspects of its operations such as the container depot, freeing up space at Port Chalmers enabling Port Otago to increase freight capacity, operational efficiency and resilience to supply chain disruption. The DCC has identified the need for an Inland Freight Hub South of Dunedin in its Zero Carbon Plan. Accordingly, an indicative site for an inland freight hub is shown in this FDS. This will facilitate further investigations into its feasibility and support stakeholders; including NZTA Waka Kotahi, KiwiRail, DCC, ORC, Port Otago and freight logistics operators; to undertake investigations to determine whether the indicative site is appropriate. Identification of an indicative site will also ensure that other strategic planning initiatives, such as the strategic transport study for Mosgiel (to be undertaken 2024-2027), consider the potential for an inland freight hub. The freight hub will not comprise general 'industrial zoned' land or any other land use including retail, commercial or residential activities. If it proceeds to an approvals stage it will require site specific zoning provisions that focus solely on warehousing and goods storage and movements."

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

Construction of the proposed facility is estimated to be approximately s 9(2)(b)(ii) which will provide a significant source of economic stimulus during the construction phase.

Once operational, there will also be significant economic benefits associated with:
- Reduced freight logistics costs associated with move from road to rail – this will represent a 30% saving for freight producers.
- Reduced road maintenance costs.
- Reduced congestion making the wider Dunedin transport network more efficient for other road users.
- Increased utilisation and productivity of existing rail network – Currently there is a shortage of shipping capacity for products produced in Southland due to there being only one ship per fortnight from Southport (Bluff). As a result of this product is currently trucked from Southland to Port Otago. By supporting Port Otago to maximise its current resources the Freight Hub will enable these products to be moved to rail, stored at the Freight Hub and then transported to Port Otago. This will increase utilisation of the Kiwirail network, improve efficiency for Freight producers by reducing transport costs. If 50% of the product currently transported from Southland to Port Otago via trucks was moved to rail transport costs would be reduced from $10,287,000 to approximately $7,000,000. Added to that are the reduced road maintenance costs, reduced congestion and reduced carbon emissions.
- Increased utilisation and productivity of existing Port Otago infrastructure – consolidating freight logistics for delivery to port will significantly improve the efficiency of the Port operation by freeing up port land to optimise its ability to serve and turnaround ships. These efficiency improvements will support Port Otago to grow its Twenty-foot Equivalent Units (TEU) from current levels (175,000 TEU in 2023) to up to 300,000 TEU without requiring further space at Port Otago.
- Increased supply chain resilience reducing the impact that disruptions have on producers – Due to space constraints and current ship volumes Port Otago has limited space available at Port for freight buffering. This means that freight producers need to manage production levels, and freight handling in line with port space. This can, at times limit their productivity or create bottle necks. With the Freight hub there will be adequate space available, and transport capacity via train shuttles to port for freight producers to store material for 4-6 weeks, and allow port to quickly move any backlog when shipping channels free up again.

It is anticipated that approximately 30 FTE will be required to operate the Freight Hub once operational.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

Efficient and resilient handling and export of primary industry products is central to the proposal. The Logistics hub will support and improve efficiency of Port Otago. Port Otago is primarily an export port. Of the ~$5 Billion in shipping related cargo throughput value handled at Port Otago, $4.6 Billion is export, while $.4Billion is import. The majority of the export product produced by the primary industries including dairy, meat and timber products. Improving efficiency for producers getting their products to market is an important contribution to support the primary industries.

The freight task within Otago is projected to increase by 7 Million Tonnes from 11 Million tonnes in 2012 to 18 Million by 2042. This growth comes primarily from primary sector export growth. Ensuring that the supply chain is able to operate efficiently will support this primary industry growth.

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

This project will help facilitate a mode shift for freight from road to rail. Currently transport emissions contribute 34% of Dunedin's gross carbon emissions. The emissions reduction plans for Dunedin identify the need to reduce transport emissions by 42% by 2030 which can be achieved with a contribution from the freight sector involving a shift of at least 20% freight from road to rail and electrification of 14% the heavy vehicle fleet.

The New Zealand Emissions Reduction Plan also includes two targets relevant to freight transport.

Target 3 – reduce emissions from freight transport by 35% by 2035
Target 4 – Reduce the emissions intensity of transport fuel by 10 percent by 2035.

The proposed logistics hub will be a significant contributor to achieving mode shift which is predicted to reduce CO_2 emissions by 4,800 tonnes per annum within Dunedin City and will contribute to the national target to reduce freight transport emissions.

More widely, increased capacity (from efficiency gains) will support Port Otago to handle more freight. This will provide an opportunity for import products destined for Central Otago that currently get offloaded at Lyttleton to be handled via Port Otago and the Freight Hub. Shipping can generate as little as 20% of the carbon emissions as road transport and the subsequent road journey (from the Freight Hub) would be approximately 200km shorter than that required from Lyttleton to Cromwell.

Utilising rail to transport freight from Southland would reduce emissions associated with moving those products by approximately 70%.

It is intended to utilise extensive roof space within the Freight Hub to establish Solar PV Electricity Generation. This can be utilised to generate hydrogen for fuelling more efficient heavy vehicles. Mixed fuel trucks which already form part of the Dynes and HWR fleet produce approximately 40% fewer carbon emissions than typical Diesel fuelled trucks. The electricity generated will also provide electricity supply for the site and any excess will be provided to the Grid.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

Port Otago currently has constrained container storage capacity at Port Chalmers. This has important natural hazard resilience implications. The inland freight hub will be capable of buffering freight for delivery to Port Otago in the event that hazards affect the ability to transport product to Port. Mode shift from road to rail or vice versa can be implemented to respond to natural hazard events. It will also be able to guarantee quick handling of product when the rail lines to Port Otago are available again due to the ability to more quickly and efficiently handle freight between Port and the hub utilising the rail network.

Storage capacity at the freight hub will enable forward planning, allowing product to be moved to Port ahead of a significant adverse weather event that might affect transport routes between the Hub and Port Otago. Having infrastructure to support such proactive planning will enable Port Otago to continue to service incoming ships if necessary. This will reduce the 'risks' to the supply chain because there are fewer parts of it exposed to hazard risks or vulnerabilities increasing resilience and recovery of the supply chain network.

Extra container storage capability close to port will also support supply chain resilience in the event of international shipping disruption such as conflicts along shipping routes (such as recently in the Red Sea), or impacts such as those seen during Covid-19. These types of events typically see shipping capacity reduced or delayed which requires increased port-side storage to cater for the New Zealand based production that continues.

Will the project address significant environmental issues?

Not Answered

Please explain your answer here:

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

The relevant local and regional planning documents include:

Regional Policy Statement for the Otago Region 2019 (“RPS”);
Proposed Regional Policy Statement for the Otago Region 2021 (“pRPS");
Regional Plan: Water for Otago (“Water Plan”);
Dunedin City Council’s 2nd Generation District Plan (“2GP”);
Dunedin Towards 2050 – a Spatial Plan for Dunedin’ (“Spatial Plan”);
Otago Southland Regional Land Transport Plan 2021-2031 (“RLTP”); and
Dunedin City Council’s Future Development Strategy (“FDS”).

Regional Policy Statement (RPS) and Proposed Regional Policy Statement (pRPS) for the Otago Region

The RPS aims to ensure Otago’s natural and built resources are managed well, and to provide for Otago’s social, economic, cultural, and environmental wellbeing; community health and safety; and for future generations.

At a high level, the project is generally consistent with the RPS and pRPS for the following reasons:

The project will deliver integrated, effective and efficient infrastructure that will help facilitate a mode shift for freight from road to rail. This will decrease associated transport emissions and remove heavy vehicles from the city streets of Dunedin, which will help provide for the wellbeing of people, and support sustainable economic development and growth in the region;

The proposed site of the Logistics Hub is recognised in the Future Development Strategy for Dunedin. It is located to take into account other infrastructure and transport links, and it will provide an effective connection between Port Otago and other transport modes;

The project will be designed to effectively manage the flood hazard risk of the site, now and under predicted future climate change scenarios. This includes managing stormwater to avoid impacting the effective functioning of ORC’s flood management infrastructure, and ensuring that risk is not displaced off-site;

The RPS provides for activities other than primary production that have a functional need to locate in rural areas; and

The pRPS allows for activities that will provide enduring regionally significant climate change mitigation, such as the proposed Logistics Hub, even if in conflict with any policy or method of the RPS, so long as adverse effects are managed in accordance with the effects management hierarchy and the activity will not contravene a NPS or NES. Further detailed assessment work being undertaken by the Applicant includes methods for managing effects according to this hierarchy, in alignment with this provision.

Regional Plan: Water for Otago

The Water Plan promotes the sustainable management of Otago's water resources.
At a high level, the project is not inconsistent with the Otago Regional Water Plan for the following reasons:

The site will be designed and operated in a way that ensures the integrity of ORC’s flood management infrastructure and does not create or exacerbate flooding or other natural hazards associated with rivers, either on or off-site;

Stormwater and other discharges, including those generated during construction, will be captured and managed to prevent contaminants (including sediment) from entering water, or onto or into land in circumstances which may result in any contaminant entering water; and

Hazardous substance storage areas will be designed, and risk management mechanisms will be implemented, to prevent the possibility of accidental spills resulting in the contamination of surface or ground water in Groundwater Protection Zones.

Dunedin City Council’s 2nd Generation District Plan
2GP seeks to sustainably manage the natural and physical resources of Dunedin to meet the needs of current and future generations and to provide for their social, economic and cultural wellbeing and for their health and safety.

At a strategic policy level, the project is generally consistent with 2GP for the following reasons:

2GP seeks the efficient and effective development of facilities and infrastructure that are important for economic productivity (including major facilities and key transport routes) such as the proposed Logistics Hub;

Feasibility investigations have determined that the Logistics Hub has a critical operational need to be located at the proposed site (as previously described), and it will be designed and operated in a way that reduces the risk from natural hazards; and

The site is currently zoned Rural Taieri Plan. The zone provisions are highly directive against industrial land uses on rural land generally. The very specific locational needs of a logistics hub were not anticipated and would likely require a Plan Change to be pursued if the Fast Track process is not available. The site has been recognised in the city's FDS as the location for a proposed inland port / freight hub (as set out previously).

Dunedin Towards 2050 – a Spatial Plan for Dunedin
The project is consistent with the Spatial Plan – which specifically seeks to encourage and support increased use of rail for freight, protect potential freight hubs and rail infrastructure and prioritise use of rail for freight transport into the future, which is the purpose of the project.

Furthermore, by removing heavy vehicles from Dunedin's inner-city streets, the project also supports objectives and policies of the Spatial Plan that relate to reducing congestion and improving safety and amenity for cyclists and other road users.

Otago Southland Regional Land Transport Plan 2021-2031
As set out previously, the RLTP identifies the need for a freight / logistics hub south of Dunedin, which would provide opportunities for freight movement north, south and west. As such, the project is consistent with the outcomes sought by the RLTP.

Dunedin City Council's Future Development Strategy
The proposed site for the Logistics Hub has been recognised in the FDS, and therefore consistent with its strategic directions, as set out previously. Specifically, the Logistic Hub is recognised in Key Transport Priority 6.3.2.4 of the FDS as follows:

6.3.2.4 Investigation and establishment of an inland freight hub

"Freight transport is a significant issue for Dunedin. It is critical achieving a thriving urban and rural economy within the district and wider region. Current freight transport routes include the use of trucks to move freight to and from Port Chalmers and this has significant consequences in terms of road maintenance, safety and connectivity for active transport users within the City and high carbon emissions. Port Chalmers is space constrained meaning it has only limited capacity to increase freight volumes before further land reclamation would be necessary. Increasing the proportion of freight moved by rail would have significant benefits in terms of efficiency, reduced carbon emissions, road safety and amenity. Achieving this 'mode shift' requires a fundamental change to the way freight is handled within Dunedin. Establishment of an inland freight hub would enable Port Otago to relocate aspects of its operations such as the container depot, freeing up space at Port Chalmers enabling Port Otago to increase freight capacity, operational efficiency and resilience to supply chain disruption. The DCC has identified the need for an Inland Freight Hub South of Dunedin in its Zero Carbon Plan. Accordingly, an indicative site for an inland freight hub is shown in this FDS. This will facilitate further investigations into its feasibility and support stakeholders; including NZTA Waka Kotahi, KiwiRail, DCC, ORC, Port Otago and freight logistics operators; to undertake investigations to determine whether the indicative site is appropriate. Identification of an indicative site will also ensure that other strategic planning initiatives, such as the strategic transport study for Mosgiel (to be undertaken 2024-2027), consider the potential for an inland freight hub. The freight hub will not comprise general 'industrial zoned' land or any other land use including retail, commercial or residential activities. If it proceeds to an approvals stage it will require site specific zoning provisions that focus solely on warehousing and goods storage and movements."

Anything else?

Please write your answer here:

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

Yes

If yes, please explain:

The site is subject to Hazard 1 and Hazard 2 overlays. These flood hazards are understood and are being factored into the design process for the site, including site layout and design and provision of onsite water management. The work and modelling will include adjustments for climate change effects.

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

Nil

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:
Bridget Irving

Important notes