



# 2GP Plan Changes and RM Reform

8 July 2025

# Workshop purpose

- To update councillors on RM reform and implications for City Development plan change programme
- To seek feedback on new priorities for the planning work programme to respond to RM reform
- To brief councillors on the Council submission on National Direction packages
- Next steps: Report to Council on 12 August to seek formal decision on Plan Change 2 (which is currently on hold).





RM reform  
– overall  
system  
design and  
timing



## **Current: Phase 2 of RM reform**

- **Fast Track Approvals Act 2024**
  - In effect from February 2025
- **RMA Bill 1: Resource Management (Freshwater and Other Matters) Amendment Act 2024**
- **RMA#2 Consenting and other system changes Amendment Bill**
  - Passed first reading December 2024, S.C. Report out
- **RMA National Direction**

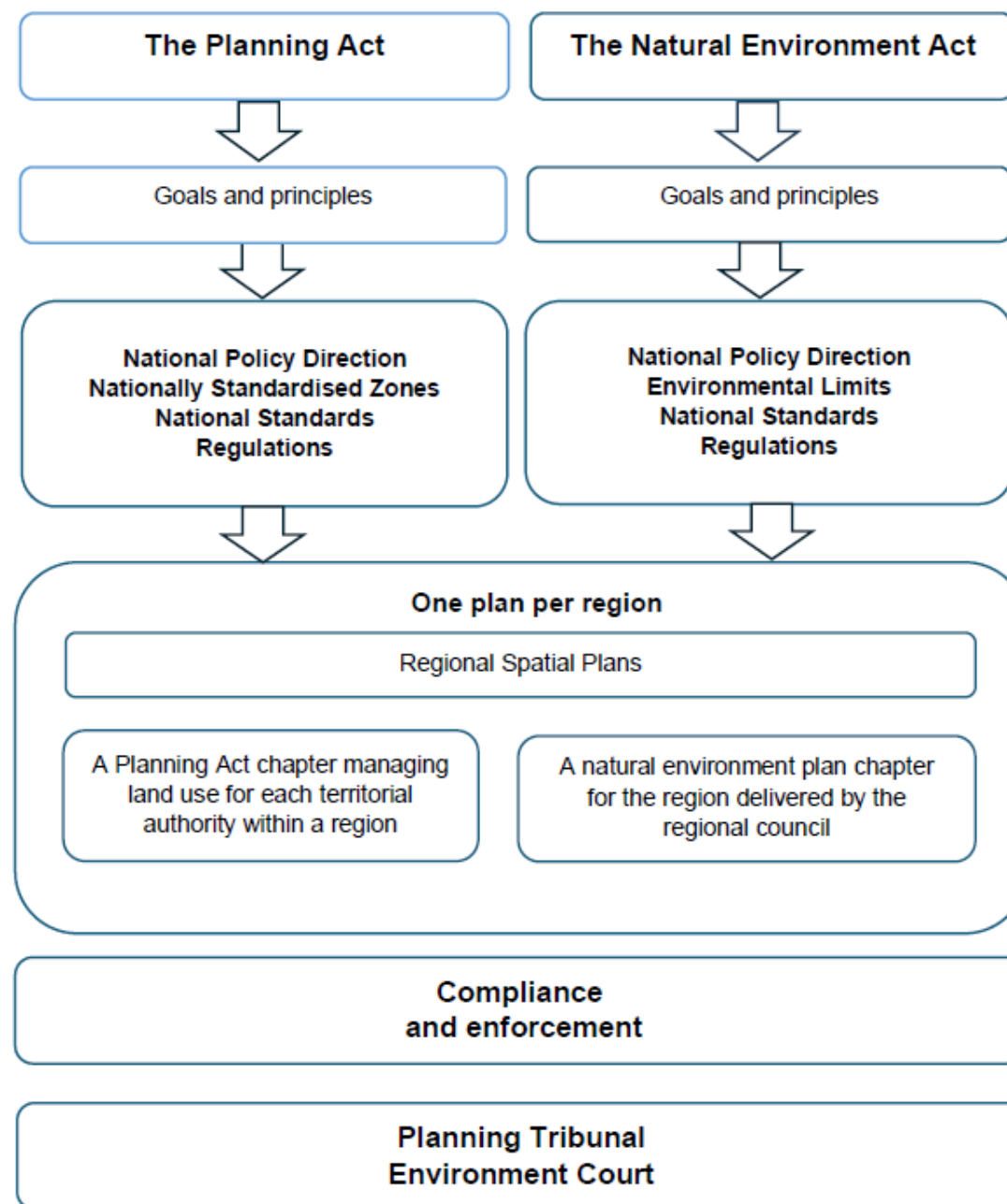




## Phase 3 (late 2025 )

- Introduce Bills in Parliament in late 2025 and pass these into law in mid-2026
- Cabinet decisions on key features:
  - Focus on enjoyment of property rights
  - Narrow scope of system and effects it manages
  - Shifting focus of policy setting to a national level
  - Greater standardisation

*Main mechanisms for decision-making under the Planning Act and NEA*



# Key features of new system

## Key changes:

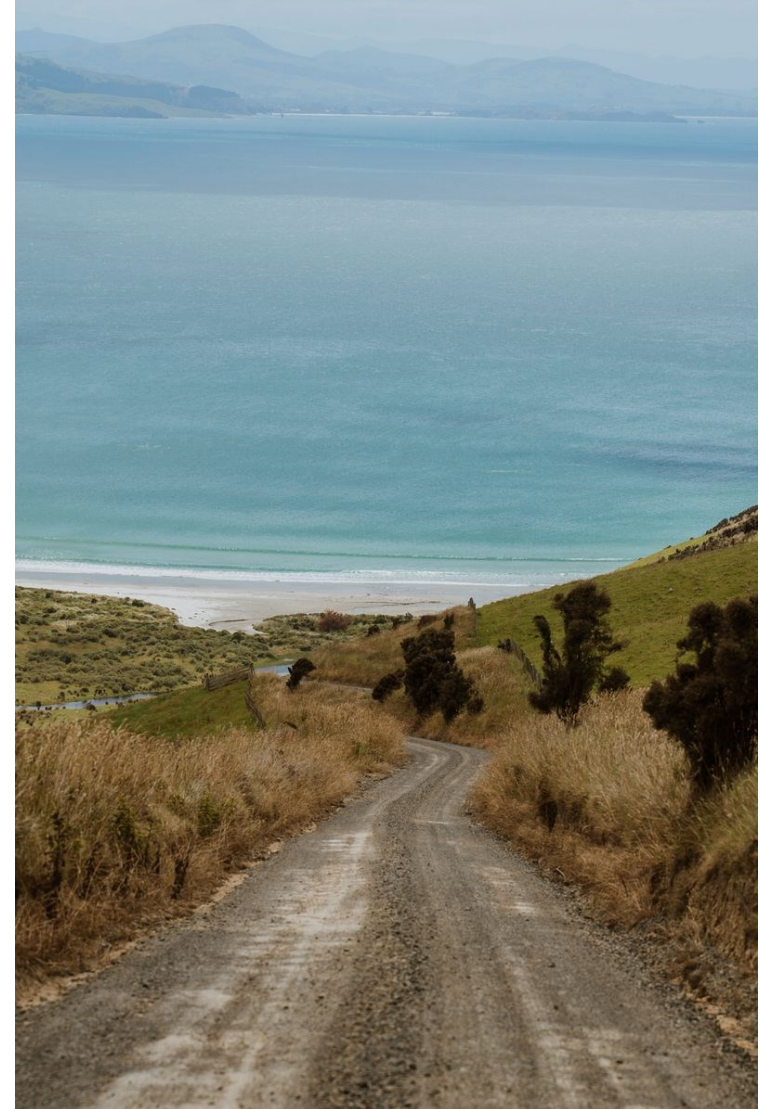
- Visual amenity and character → removed not replaced
- Historic heritage, notable trees and archaeological sites → HNZ
- Natural Hazards → regional councils
- Landscapes → (reduced) regional councils
- Environmental monitoring and enforcement → new regulator





# Key features of new system

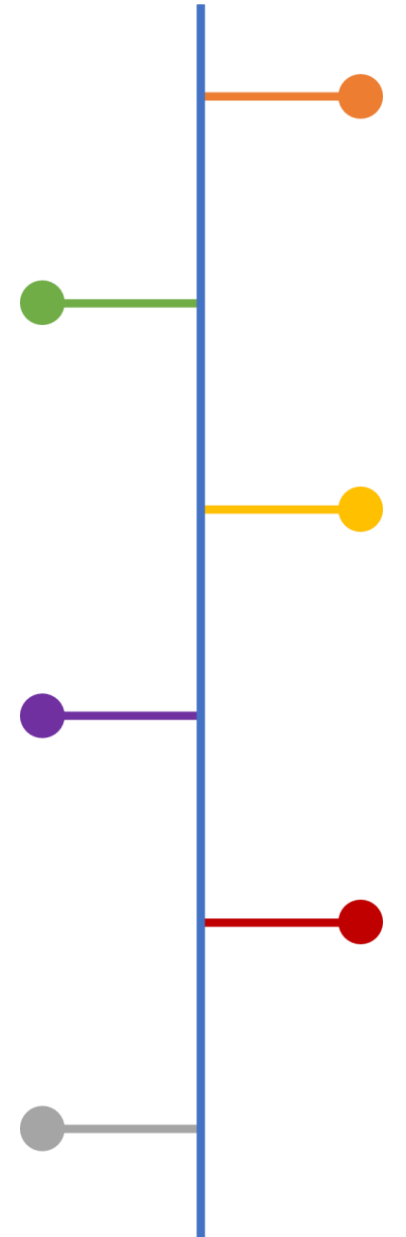
- Standardised plan provisions under Planning Act
  - Menu of zones complete with their rules
- Bespoke provisions possible
  - require a regulatory justification report
  - can trigger consideration of 'regulatory takings'
  - increased potential for appeals





# Phase 3 Reform: Implementation timeline

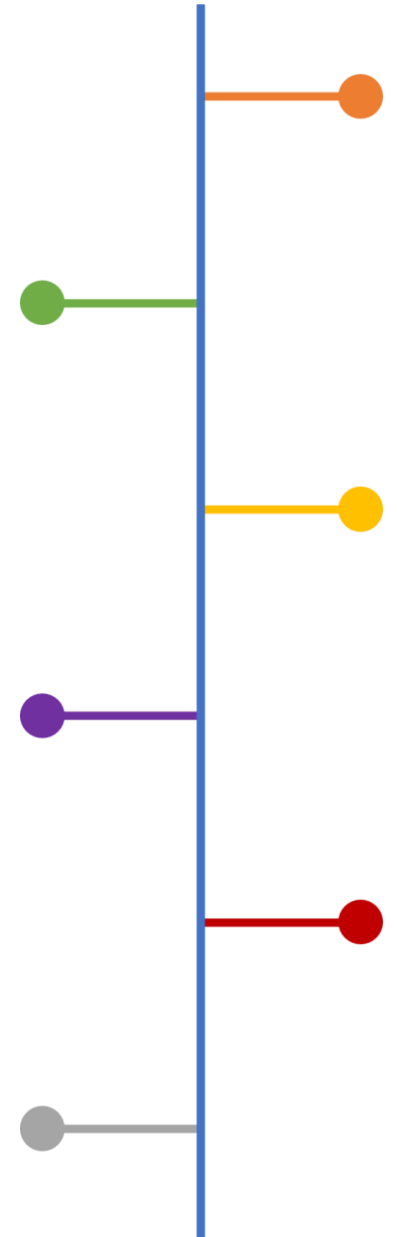
- Implementation timeline:
  - Spatial Plans: early-mid 2026 to mid 2027
  - Other plan 'chapters' ? start late 2027 or 2028
- Timelines for other recommendations from EAG less clear:
  - National compliance regulator
  - Changes to move heritage to HNZ



# District Plan transition timetable

- \*RMA plans switched off in 3-5 years
- \*RMA plan changes will be restricted as part of introduction of new system (mid 2026)
- Sector has requested:
  - all requirements that may trigger plan changes are suspended
  - pathway to allow urgent Council-initiated plan changes under RMA post enactment

\* assumptions





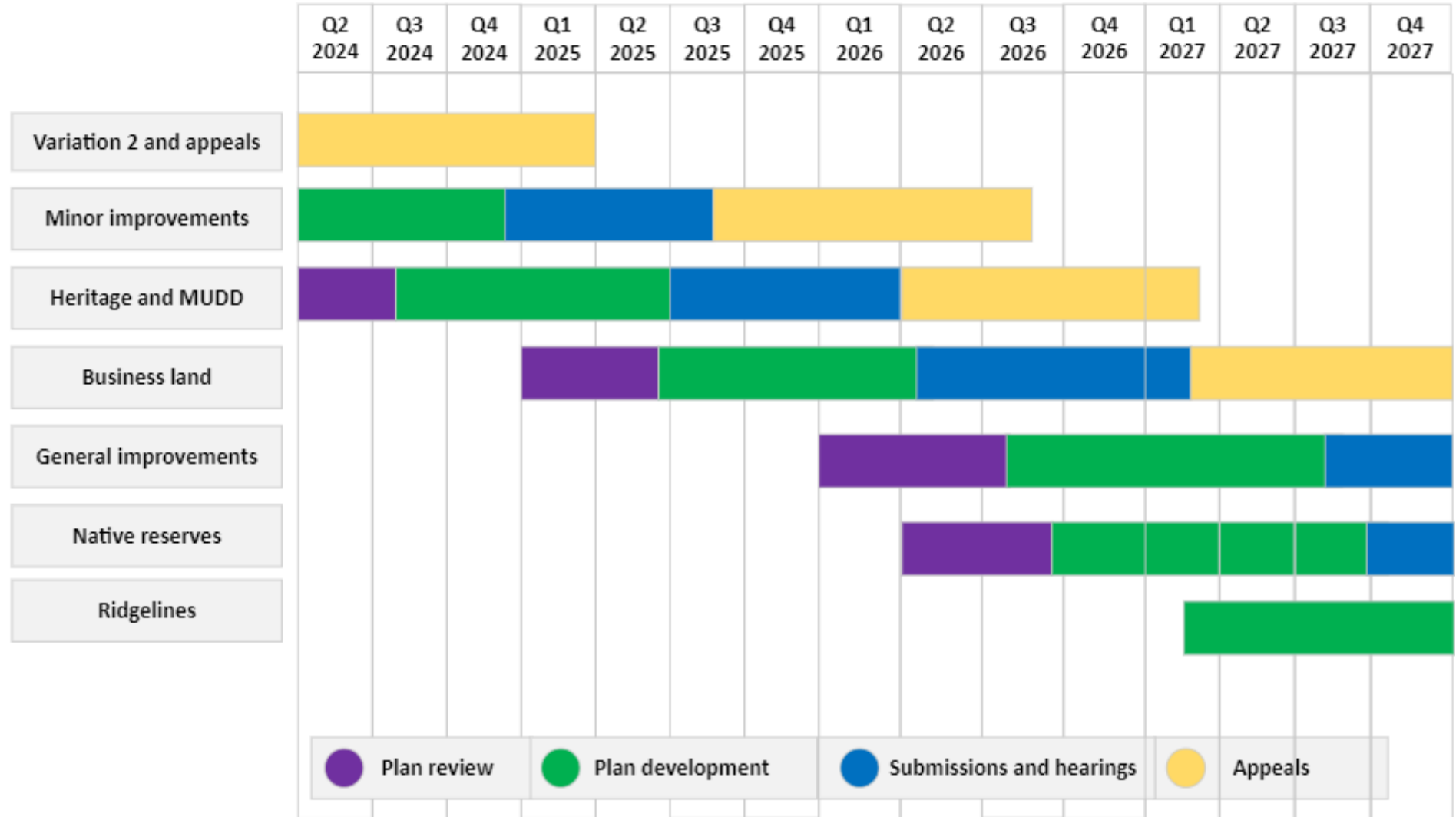
Questions ?



# 2GP work programme



# 2GP work programme (June 2024)



## Currently active projects:

- **Appeals on 2GP and Variation**

- Largely resolved, 2 remaining

- **Plan Change 1 - Minor Improvements**

- Stage 1 Heritage: Decision to be released 17 July, Appeal period 17 July to 27 August
- Stage 2: Non-heritage topics Hearing starting 18 August – decision expected Sept / Oct
- There are likely be appeals from both decisions







# Plan Change 2 initiated (placed on hold)

- **Plan Change 2 – Heritage and Multi-unit Design and Development**
  - Plan change was initiated in August 2024. Responds in part to an appeal agreement
  - Work has been paused due to changes proposed through RM reform
  - Key MUD topics include:
    - improved assessment guidance and standards for multi-unit housing
    - reviewing the ‘height in relation to boundary’ rule
  - Key heritage topics include:
    - better protecting buildings with significant heritage values
    - better management of heritage values of precincts
    - giving effect to RPS
    - clarifications and corrections to rules and schedule

# Plan Changes not yet initiated

- **Business land**
  - To address a shortfall in industrial land and zoning changes identified in FDS
  - Programmed to start 2025
- **General improvements**
  - Similar to Plan Change 1
  - Programmed to start 2026
- **Use of native reserves / papakāika**
  - Responds to an agreement with Rūnaka
  - Programmed to start 2026
- **Ridgelines – review ridgeline protection**
  - Responds to an agreement with Rūnaka
  - Programmed to start 2027







## Other aspects of planning work programme

# Other workstreams - current

- South Dunedin Future project
- Responding to RM reform (Phase 2)
- Early Spatial plan prep work (jointly with ORC)
  - Housing demand work
  - Infrastructure constraints mapping
- Designations responses, still potential for private plan changes





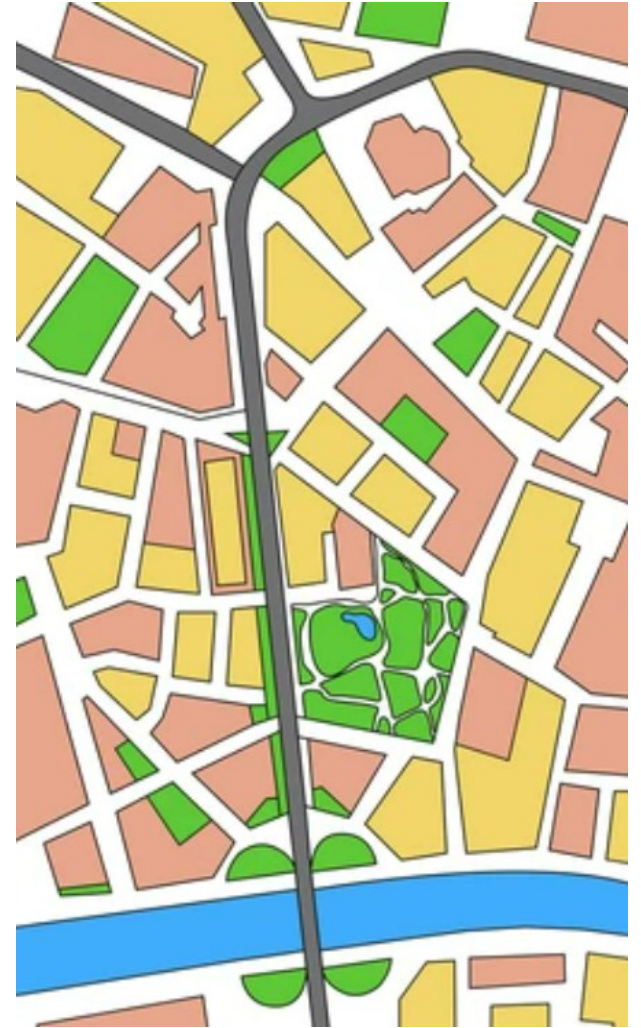
# Other workstreams – 2025 / early 2026

- Engagement on Phase 3 of RM Reform:
  - Submission on RM Reform bills (late 2025)
  - Engagement on new national direction and national plan provisions
  - Anticipating significant piece of work!
- Starting further Spatial Plan/ GHG implementation workstreams



# Spatial Plan key work

- Housing and Business Land Needs Assessment
- Hazards constraints and land use implications
- Infrastructure capacity and constraints
- Growth prioritisation and sequencing (10 years minimum)
- Develop 'responsive' framework including new financial tools
- Environmental constraints (w/ORC)
  - SNAs, ONLs, HPL
- Mana whenua values / Spatial layers







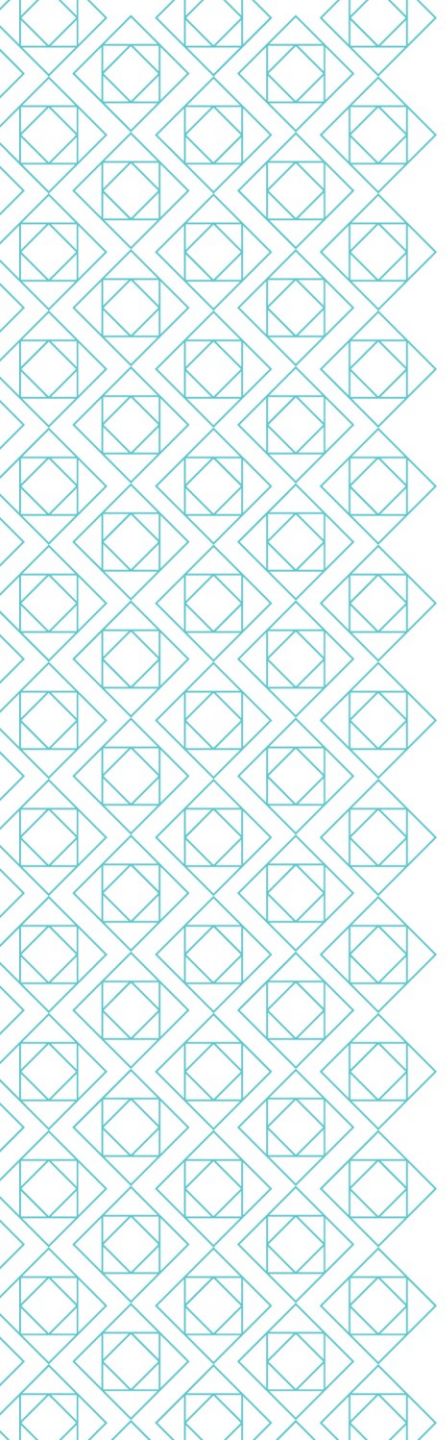
Recommendation  
for amended  
work programme



# Impact of National Planning Standards

- Existing standardised plan format and definitions
- Transition required by early May 2026
- Any plan changes notified from May 2026 have to comply with these standards
- Very challenging to apply through a focussed plan change given existing 2GP structure





# Implications of RM Reform proposals for new plan changes (under the RMA)

- **Latest possible notification date**
  - April 2026 (unless NPS requirement removed) *OR*
  - Q2 2026 when new legislation enacted - likely to stop all or most plan changes under RMA
- **Constraints on meeting this notification date**
  - Notification date limited by rates mail out (quarterly)
  - Council stand-down period around election time
  - Small window available
- **Lifespan of plan change**
  - If notify April 2026 - decision towards end 2026
  - Lifespan likely ~3 years (mid/late 2026 to 2029)





# Potential work priorities for next 12 months

## **Must Do:**

- Continue work on appeals (statutory requirement)
- Continue work on Plan Change 1 (hearings, decisions, appeals)
- Respond to RM reform engagement
- Designations and any private plan changes
- SDF

## **Should Do:**

- Spatial Plan early work / preparation
- Progress work on use of native reserves (with Aukaha)

## **Could Do:**

- Small scope plan change for urgent / high impact matters (including aspects of PC2)



# Plan change – potential topics

## PC2 Heritage - refocus on incentives

- benefits for building owners in short term
- provisions shortlived

## RPS provisions on native reserves / papakāika

- high interest to rūnaka
- only a limited 'quick fix' likely to be achievable

## Business land

- consider some of zoning changes identified in FDS

## Hazards / South Dunedin

- investigate immediate responses to risk assessment
- unlikely to be achievable in timeframe (feed into new system instead)





# Options for forward work programme

## **Option 1 (recommended option):**

- Stop work on PC2
- Do not initiate any further plan changes
- Focus on Spatial Plan and other RM reform preparation and other actions to support policy goals
- Progress work on use of native reserves

## **Option 2:**

- Undertake a limited-scope plan change on urgent, high impact matters



# Next steps (subject to feedback from today)

- Report to **Council 12 August 2025** on proposed 2GP work programme
- Will cover background from this workshop and recommend Council formally stops Plan Change 2, so that information can be communicated to public/ key stakeholders



# Questions and Discussion





# Council submission on National Direction packages



# National direction packages

## National direction packages:

1. Infrastructure and Development
2. Primary Sector
3. Freshwater
4. Going for Housing Growth

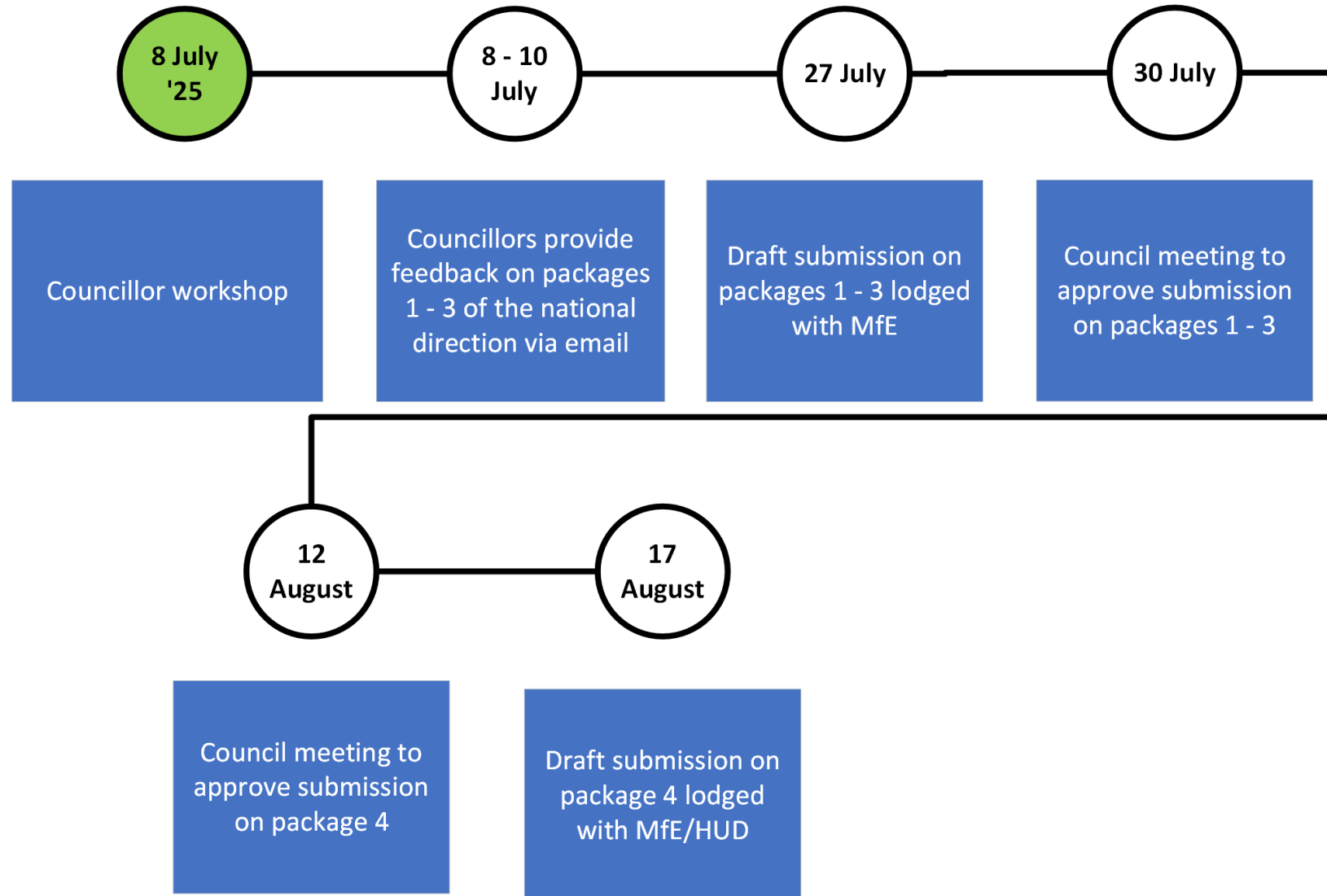
## Due dates:

- Packages 1 – 3, consultation closes **27 July**
- Package 4, consultation closes **17 August**





# National direction packages - roadmap





# Key themes from submission Package 1

- Theme 1 – Benefits vs risk of national direction
- Theme 2 – Getting the needle in the right position (environmental protection vs enabling growth and development)
- Theme 3 - Takata Whenua engagement
- Theme 4 – Transitional Arrangements and Future System Considerations
  - The Need to Appropriately Balance Local Democracy with Central Government Direction
  - The Need for Enduring Legislation
  - The Importance of a Robust National Planning Framework Process





## Key points from GHG (Part 2)

Pillar 1 – Freeing up land for urban development, including removing unnecessary planning barriers

Pillar 2 – Improving infrastructure funding and financing to support urban growth

Pillar 3 – Providing incentives for communities and councils to support growth.

- Decisions on Pillar 3 are expected to be taken by the end of 2025

Pillar 1 and 2 designed to work together (free up land, make it easier to fund infrastructure to support that development)



## Pillar 1 (RM reform changes - phase 3)

- Move from 30 to 50 year planning horizon for spatial and infrastructure planning
- Development capacity to meet 30 years of demand (based on high growth projections), plus a 20% contingency margin
- Be more **responsive** to unanticipated or out-of-sequence development and greater responsiveness to private plan changes
- Better enable urban expansion (including where leap-frogs)
- Loosen controls on where business activities can locate (criticism of centres hierarchy policies)





## Pillar 2 (Funding)

- Replacing development contributions with a development levy system
- Improving the Infrastructure Funding and Financing Act 2022 and improving the flexibility of targeted rates for growth infrastructure
- Improving the flexibility of targeted rates for growth infrastructure
- Implementation plans to include information about the demand, cost and supply of infrastructure, minimum infrastructure requirements and identification of priority development areas

# Discussion





Otago  
Regional  
Council

 **DUNEDIN** | kaunihera  
CITY COUNCIL | a-rohe o  
Ōtepoti