

**Notice of Meeting:**

I hereby give notice that an ordinary meeting of the Policy and Planning Committee will be held on:

**Date:** **Thursday 5 February 2026**  
**Time:** **9.00 am**  
**Venue:** **Council Chamber, Level 2, Dunedin Public Art Gallery, The Octagon, Dunedin**

Sandy Graham  
Chief Executive Officer

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**Policy and Planning Committee**

**PUBLIC AGENDA**

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**MEMBERSHIP**

<b>Chairperson</b>	Mayor Sophie Barker
<b>Deputy Chairperson</b>	Deputy Mayor Cherry Lucas
<b>Members</b>	Cr John Chambers Cr Doug Hall Cr Russell Lund Cr Benedict Ong Cr Mickey Treadwell Cr Steve Walker
	Cr Christine Garey Cr Marie Laufiso Cr Mandy Mayhem Cr Andrew Simms Cr Lee Vandervis Cr Brent Weatherall
<b>Senior Officer</b>	David Ward, General Manager 3 Waters, Property and Urban Development
<b>Governance Support Officer</b>	Rebecca Murray

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Rebecca Murray  
Governance Support Officer

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[www.dunedin.govt.nz](http://www.dunedin.govt.nz)

**Note:** Reports and recommendations contained in this agenda are not to be considered as Council policy until adopted.



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**1 KARAKIA TIMATANGA**

The meeting will open with a Karakia Timatanga.

**2 PUBLIC FORUM**

At the close of the agenda no requests for public forum had been received.

**3 APOLOGIES**

At the close of the agenda no apologies had been received.

**4 CONFIRMATION OF AGENDA**

Note: Any additions must be approved by resolution with an explanation as to why they cannot be delayed until a future meeting.

## DECLARATION OF INTEREST

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### EXECUTIVE SUMMARY

1. Members are reminded of the need to stand aside from decision-making when a conflict arises between their role as an elected representative and any private or other external interest they might have.
2. Elected members are reminded to update their register of interests as soon as practicable, including amending the register at this meeting if necessary.

### RECOMMENDATIONS

That the Committee:

- a) **Notes/Amends** if necessary the Elected Members' Interest Register attached as Attachment A; and
- b) **Confirms/Amends** the proposed management plan for Elected Members' Interests.

### Attachments

	<b>Title</b>	<b>Page</b>
<u>A</u>	Policy and Planning Committee Interest Register	6

<b>Policy and Planning Committee Interest Register</b> <b>29 January 2026</b>				
<b>Name</b>	<b>Responsibility (i.e. Chairperson etc)</b>	<b>Declaration of Interests</b>	<b>Nature of Potential Interest</b>	<b>Member's Proposed Management Plan</b>
Mayor Sophie Barker	Shareholder	Ayrmmed Limited	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Shareholder	Various publicly listed companies	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Property Owner	Residential Property Owner - Dunedin	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Beneficiary	Sans Peur Trust (Larnach Castle)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Mentor	Business Mentors NZ	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Vegetable Growers Club	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	Alexander McMillan Trust	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Patron	New Zealand International Science Festival	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Patron	Dunedin Horticultural Society	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Institute of Directors	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Chairperson	Dunedin Heritage Fund (Council Appointment)	No conflict Identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Grow Dunedin Partnership (Council Appointment)	No conflict Identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Heritage Advisory Group (Council Appointment)	No conflict Identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Local Government New Zealand (Zone 6) (Council Appointment)	No conflict Identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Co-Chair	Ōtepoti Dunedin Destination Management Plan Advisory Panel (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr John Chambers	Family Member	Family Member employed at Wilkinson Rogers	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Tertiary Precinct Planning Group (Council Appointment)	No conflict Identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Owner	Residential Property	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Owner	Rental Property	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Otakau Golf Club	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Opera Otago	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.

Name	Responsibility (i.e. Chairperson etc)	Declaration of Interests	Nature of Potential Interest	Member's Proposed Management Plan
Cr John Chambers (cont)	Member	Waikouaiti Coast Community Board (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr Christine Garey	Trustee	Garey Family Trust - Property Ownership - Dunedin	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Daughter employee	Halo Project	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	Ashburn Hall Charitable Trust Board	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Creative Dunedin Partnership (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Performing Arts Advisory Group (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
		Sophia Charter (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	St Paul's Cathedral Foundation (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Theomin Gallery Management Committee (Olveston) (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr Doug Hall	Trustee	Cronus Trust	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Owner	Clickfix Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	District Licensing Committee (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Public Art Gallery Society (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Toitū Otago Settlers Museum Board (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	West Harbour Community Board (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr Marie Laufiso	Property Owner	Residential Property	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	Moray Place Community Building Trust - which owns property 111 Moray Place	Duty to Trust may conflict with duties of Council Office	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Women of Ōtepoti Recognition Initiative	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	Corso Ōtepoti Dunedin Trust	Potential grants recipient	Withdraw from discussion and leave the table. If in public excluded leave the room. Seek advice prior to the meeting.
	Dunedin Branch Treasurer	P.A.C.I.F.I.C.A Inc	Potential grants recipient	Withdraw from discussion and leave the table. If in public excluded leave the room. Seek advice prior to the meeting.
	Expert Panel Member	Health Coalition Aotearoa Public Health Infrastructure Committee	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	The Ōtepoti Community Builders Charitable Trust	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee/Secretary	Refugee Support Group	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Abrahamic Interfaith Group (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Former Refugee Steering Committee (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.

Name	Responsibility (i.e. Chairperson etc)	Declaration of Interests	Nature of Potential Interest	Member's Proposed Management Plan
Cr Marie Laufiso (cont)	Member	Puketai Residential Centre Liaison Committee (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Social Wellbeing Advisory Group (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr Cherry Lucas	Trustee	Otago Farmers Market	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Partner	Southway Enterprises	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	Henderson Lucas Family Trust - Residential Dunedin Property	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	NZ Institute of Chartered Accountants	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Shanghai Association (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Local Government New Zealand (Zone 6) (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Tūhura Otago Museum Trust Board (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Ōtepoti Dunedin Destination Management Plan Advisory Panel (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Taiheri Airport Trust (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Tertiary Precinct Planning Group (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Te Poāri a Pukekura (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Mosgiel-Taiheri Community Board (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr Russell Lund	Shareholder	Loan & Mercantile Trust includes:	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Produce Place Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Dunedin Grain Store Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director/Shareholder	Loan & Mercantile 2000 Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Shareholder	Lund South Trust includes:	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director/Shareholder	Lund South Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director/Shareholder	Lund Dunedin Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director/Shareholder	Resource Values Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Sherwood Manor Properties Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director/Shareholder	Lund Central Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director/Shareholder	Lund South Administration Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.

Name	Responsibility (i.e. Chairperson etc)	Declaration of Interests	Nature of Potential Interest	Member's Proposed Management Plan
Cr Russell Lund (cont)	Director	Construction Operatives Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Lund South Properties Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	RV Lund Trust	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	BDCRS Trust	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Lund Frankton Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	President	Ariki Amateur Athletic & Harrier Club	Ariki is a member of Athletics Otago which receives grant funding from DCC.	Withdraw from discussion and leave the table. If in public excluded leave the room. Seek advice prior to the meeting.
	Member	Heritage Advisory Group (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr Mandy Mayhem	Member	Otago Theatre Trust (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Chairperson	Waitati Hall Society Inc	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Chairperson	Keep Ōtepoti Dunedin Beautiful	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Co-ordinator	Emergency Response Group, Blueskin area	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	FENZ Local Advisory Committee for Otago	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Blueskin Bay Amenities Society	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Blueskin A & P Society	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Zone Representative and Board Member	Keep New Zealand Beautiful	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Coastal Community Cycleway Network	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Waitati Music Festival Committee	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Property Owner	Residential Property	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Disability Issues Advisory Group (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Gasworks Museum Trust (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Keep Dunedin Beautiful (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr Benedict Ong	Member	Performing Arts Advisory Group (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Social Wellbeing Advisory Group (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Owner	Residential Property	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Otago Settlers Association (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.

Name	Responsibility (i.e. Chairperson etc)	Declaration of Interests	Nature of Potential Interest	Member's Proposed Management Plan
Cr Benedict Ong (cont)	Member	Toitū Otago Settlers Museum Board (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr Andrew Simms	Director	Landseer Motor Investments Limited	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Landseer Motor Investments Auckland Limited t/a Andrew Simms - Motor vehicle retail	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Stephen Duff Motors Limited t/a Andrew Simms Dunedin - Motor vehicle retail	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Three Diamond Automotive t/a RalliaNZ - Race car preparation	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Cambridge Finance Limited - Financial Services	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	The Landseer Group Limited - Investments	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Otago Motorhome Centre Limited - Motor vehicle retail	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Landseer Motor Investments Henderson Limited - Motor vehicle retail	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Landseer Motor Investments Moorhouse Limited - Motor vehicle retail	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Minaret Property Investments Limited - Property Investment	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	The Newfoundland Trust	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	The Moturata Trust	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Taieri Trails Group	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Taieri Cricket Club	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Mosgiel AFC	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Owner	Residential Property	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Owner	Commercial Property. Andersons Bay Road, Dunedin	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Heritage Fund (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Heritage Advisory Group (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Tūhura Otago Museum Trust Board (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Taieri Airport Trust (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr Micky Treadwell	Director	Atawhai Interactive Tapui Ltd	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Contractor	Otago Polytechnic	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Co-owner	Residential Property	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Green Party of Aotearoa	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Otaru Sister City Society (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.

Name	Responsibility (i.e. Chairperson etc)	Declaration of Interests	Nature of Potential Interest	Member's Proposed Management Plan
Cr Mickey Treadwell (cont)	Member	Ice Sports Dunedin Incorporated (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Ōtepoti Dunedin Live Music Advisory Panel (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Te Ao Tūroa Partnership (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Otago Peninsula Community Board (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr Lee Vandervis	Director	Lee Vandervis, Antonie Alm-Lequeux and Cook Allan Gibson Trustee Company Ltd - Residential Property Ownership - Dunedin	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Bunchy Properties Ltd - Residential and Lifestyle Farm Property Ownership - Dunedin	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Owner	Various publicly Audio and Lighting - Hire, Sales and Service Business	May contrace and provide service to DCC	Withdraw from discussion and leave the table. If the meeting is in public excluded leave the room. Seek advice prior to the meeting.
	Member	District Licensing Committee (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Heritage Fund (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Okia Reserve Management Committee (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr Steve Walker	Trustee	Dunedin Wildlife Hospital Trust	Potential grants recipient	Withdraw from discussion and leave the table. If the meeting is in public excluded leave the room. Seek advice prior to the meeting.
	Member	Orokonui Ecosanctuary	Potential grants recipient	Withdraw from discussion and leave the table. If the meeting is in public excluded leave the room. Seek advice prior to the meeting.
	Member	New Zealand Labour Party	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Owner	Residential Property - Dunedin	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Shareholder	Various publicly listed companies	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	NZ Sea Lion Trust	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Justice of the Peace		No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	Predator Free Dunedin	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Edinburgh Sister City Society (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Heritage Fund (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Art Gallery Acquisitions Committee (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Hereweka Harbour Cone Trust (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	NZ Masters Games Trust Board (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Otago Regional Transport Committee (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.

Name	Responsibility (i.e. Chairperson etc)	Declaration of Interests	Nature of Potential Interest	Member's Proposed Management Plan
Cr Steve Walker (cont)	Member	Ōtepoti Dunedin Live Music Advisory Panel	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Predator Free Dunedin (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr Brent Weatherall	Owner	Residential Property	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Owner	Business George Street, Dunedin	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	Brent Weatherall Jeweller Limited	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	Weatherall Trustee Company	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	Residential Rental Properties	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Club	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Public Art Society (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Keep Dunedin Beautiful (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Toitū Otago Settlers Museum Board (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Strath Taieri Community Board (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.

## PART A REPORTS

### DUNEDIN CITY COUNCIL SUBMISSION ON THE INFRASTRUCTURE FUNDING AND FINANCE ACT AMENDMENT BILL

Department: City Development, Finance and Corporate Policy

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#### EXECUTIVE SUMMARY

- 1 This report seeks approval of a draft Dunedin City Council (DCC) submission to Finance and Expenditure Committee on the Infrastructure Funding and Finance Act Amendment Bill (the Bill). The draft DCC submission is attached as Attachment A.
- 2 The Bill is positioned as part of the Government's ***Going for Housing Growth*** programme and is intended to support infrastructure delivery that enables housing development while ensuring **beneficiaries pay**.
- 3 The Bill has been introduced to make the Infrastructure Funding and Financing (IFF) framework more viable and flexible, including by removing barriers to uptake, broadening eligibility, and enabling faster decisions and levy deferrals to address affordability concerns.
- 4 The draft DCC submission supports the principle that *growth should pay for growth*, while emphasising the need for reforms to reinforce infrastructure efficiency, long-term affordability, planned sequencing, and clear liability management.
- 5 Submissions to the Finance and Expenditure Committee close on **20 February 2026**.

#### RECOMMENDATIONS

That the Committee:

- a) **Approves** the draft Dunedin City Council Submission, with any amendments, on the Infrastructure Funding and Finance Act Amendment Bill.
- b) **Authorises** the Chief Executive to make any minor editorial amendments to the submission.
- c) **Notes** that the Mayor or delegate will speak to the submission at any hearings.

#### BACKGROUND

- 6 The Infrastructure Funding and Financing Act 2020 was established to enable growth-related infrastructure to be financed up front and then recovered over time through levies on the

properties that benefit. The intent is to reduce funding constraints that can delay infrastructure provision and, in turn, constrain housing development.

- 7 The Amendment Bill has been introduced in response to low uptake to date and with the stated intent of making the tool easier to use, more scalable, and applicable to a wider range of delivery agencies and project types. The changes are described as removing unnecessary barriers, broadening eligibility (including to additional infrastructure agencies), reducing veto risks where requirements are met, and improving usability through changes such as levy deferrals.
- 8 DCC's draft submission sits alongside earlier DCC engagement on "Going for Housing Growth" settings and reflects ongoing local concerns about the interaction between development responsiveness, infrastructure affordability, and whole-of-life network performance (refer to the Going for Housing Growth submission approved by Council on 12 August 2025).

## **DISCUSSION**

- 9 The Amendment Bill is intended to increase the uptake and effectiveness of the Infrastructure Funding and Financing framework by making it easier to use, expanding who can apply and what projects can qualify, and improving affordability and delivery settings so infrastructure can be brought forward to support housing growth.
- 10 The draft submission supports "growth pays for growth" in principle, and seeks to ensure IFF tools reinforce infrastructure efficiency and long-term affordability rather than embedding high-cost servicing patterns.
- 11 The submission notes that highly responsive development settings can drive urban expansion into locations where infrastructure is costly to provide, particularly for three waters, and provides Dunedin operating cost evidence indicating substantially higher costs for small rural schemes relative to metropolitan systems.
- 12 The submission recommends decision criteria and guidance that require clear demonstration of whole-of-life infrastructure efficiency and long-term affordability, including consideration of lifecycle operating and maintenance costs.
- 13 The submission emphasises the importance of planned sequencing and avoiding incentives for leapfrogging, including by strengthening settings that discourage land banking and focusing responsiveness on areas with existing reticulated services.
- 14 The submission supports location-specific, cost-reflective charging so higher-cost growth areas bear higher costs and cross-subsidy is minimised, maintaining stronger price signals for efficient development locations.
- 15 The submission also raises implementation risks relating to council decision-making and long-term liabilities, including risks where privately delivered infrastructure is accelerated but later integrates into public networks, and recommends enforceable standards and robust acceptance and vesting processes.
- 16 Finally, the submission highlights practical workability issues in funding mixed public and private benefit infrastructure within planning and budgeting cycles, and the need for clear coherence between IFF levies and other area-based charging tools.

## OPTIONS

17 Two options are presented in this report for Council's consideration.

### **Option One – Approve and submit DCC's draft submission on the Infrastructure Funding and Financing Amendments Bill (Recommended Option)**

18 Approving the draft submission enables DCC to provide timely feedback to the select committee on the Bill's purpose and implementation settings.

#### *Advantages*

- Enables DCC to demonstrate support for the changes proposed but also seek meaningful changes that will improve the effectiveness of the mechanisms for supporting cost-effective infrastructure delivery for DCC.

#### *Disadvantages*

- None identified.

### **Option Two – Do not submit on the Infrastructure Funding and Financing Amendments Bill**

19 Choosing not to submit avoids taking a formal Council position at this stage.

#### *Advantages*

- None identified.

#### *Disadvantages*

- DCC loses the opportunity to formally express its reservations, reinforce infrastructure efficiency and long-term affordability expectations, and influence implementation settings that may affect future costs and liabilities.

## NEXT STEPS

20 Any final amendments to the draft submission will be incorporated following any additional internal input or Council direction.

21 Subject to Council approval, the submission will be finalised and lodged with the Finance and Expenditure Committee by 20 February 2026.

## Signatories

Author:	Bede Morrissey - Policy Planner Tony Nelmes - Project Accountant Berkay Kocak - Policy Analyst
Authoriser:	Dr Anna Johnson - Manager City Development Carolyn Allan - Chief Financial Officer David Ward - General Manager, 3 Waters, Property and Urban Development

**Attachments**

<b>Title</b>	<b>Page</b>
<a href="#"><u>A</u></a> Attachment A - DCC Submission on the IFFA Bill	19

## SUMMARY OF CONSIDERATIONS

### ***Fit with purpose of Local Government***

Approving the draft submission supports the purpose of local government by enabling the Council to participate in the development of national settings that may materially affect local infrastructure delivery, growth outcomes, and funding responsibilities. The decision supports democratic local decision-making by ensuring DCC can formally communicate Dunedin's interests and practical considerations on how growth-enabling infrastructure should be financed, sequenced, and managed over time. It also supports community well-being by advocating for settings that promote long-term affordability, efficient infrastructure investment, and sustainable servicing outcomes for current and future communities.

### ***Fit with strategic framework***

	Contributes	Detracts	Not applicable
Social Wellbeing Strategy	<input type="checkbox"/>	<input type="checkbox"/>	✓
Economic Development Strategy	<input type="checkbox"/>	<input type="checkbox"/>	✓
Environment Strategy	<input type="checkbox"/>	<input type="checkbox"/>	✓
Arts and Culture Strategy	<input type="checkbox"/>	<input type="checkbox"/>	✓
3 Waters Strategy	<input type="checkbox"/>	<input type="checkbox"/>	✓
Future Development Strategy	<input type="checkbox"/>	✓	<input type="checkbox"/>
Integrated Transport Strategy	<input type="checkbox"/>	<input type="checkbox"/>	✓
Parks and Recreation Strategy	<input type="checkbox"/>	<input type="checkbox"/>	✓
Other strategic projects/policies/plans	<input type="checkbox"/>	<input type="checkbox"/>	✓

The decision relates to approving a submission on central government legislation and does not directly implement or amend Council strategies. The impacts are primarily enabling and indirect, and the decision is therefore not applicable to most strategies. It is most closely linked to growth sequencing and infrastructure provision matters within the Future Development Strategy and linked to DCC's Housing Implementation Plan.

### ***Māori Impact Statement***

The Infrastructure Funding and Financing Amendment Bill may have impacts for Māori where levy schemes involve **protected Māori land** or **Māori land**, including changes to consent settings for including protected Māori land in levy areas, requirements for **prior written landowner consent** where works are constructed on protected Māori land, and clarifications about levy liability for Māori land (including limits on trustees' liability in some cases). These matters align with **Te Taki Haruru** through **Autūroa (Mana)** and **Autikaka (Tapu/Noa)**, emphasising partnership, landholder authority, and protection of people and places in policy and decision-making.

### ***Sustainability***

There are no implications for sustainability.

### ***LTP/Annual Plan / Financial Strategy /Infrastructure Strategy***

The decision does not amend the LTP, Annual Plan, Financial Strategy, or Infrastructure Strategy. The proposed policy direction may have implications for these instruments in future if the model is implemented.

**SUMMARY OF CONSIDERATIONS*****Financial considerations***

There are no direct financial costs associated with approving the submission. The proposal itself could have significant future financial implications for the Council, and the draft submission outlines concerns about this potential impacts.

***Significance***

This decision is of low in terms of the Council's Significance and Engagement Policy, as it relates to approving a submission rather than committing Council to a new policy or expenditure.

***Engagement – external***

There has been no external engagement.

***Engagement - internal***

The draft submission has been developed internally with input from relevant staff with financial and policy expertise.

***Risks: Legal / Health and Safety etc.***

There are no material legal or health and safety risks associated with approving the submission.

***Conflict of Interest***

No conflicts of interest have been identified.

***Community Boards***

There are no implications for Community Boards



27 January 2026

Committee Secretariat  
Finance and Expenditure Committee  
Parliament Buildings  
Wellington

[fe@parliament.govt.nz](mailto:fe@parliament.govt.nz)

Closing date: 20 Feb 2026

**DUNEDIN CITY COUNCIL SUBMISSION ON THE INFRASTRUCTURE FUNDING AND FINANCING AMENDMENTS BILL**

Tēnā koutou,

1. The Dunedin City Council (DCC) welcomes the opportunity to submit on the Infrastructure Funding and Financing Amendments Bill (the Bill). DCC's submission draws on practical experience delivering and maintaining local infrastructure, and on the importance of aligning development settings with affordable infrastructure financing tools and long-term network performance.
2. DCC supports the principle that *growth should pay for growth*, and the intent of the Infrastructure Funding and Financing (IFF) framework to enable timely infrastructure delivery to support growth, independent of Council funding constraints. DCC stresses the importance that reforms consider councils' ability to plan, sequence and deliver infrastructure in a way that is cost-effective over the long term, and that avoids shifting costs and liabilities onto existing communities.

**A. *Infrastructure efficiency and long-term affordability as a central system objective***

3. We are concerned that a planning system focused on enabling responsiveness will likely result in urban expansion in locations where infrastructure cannot be efficiently provided. Although Councils do not directly fund infrastructure delivered under the IFF framework, the Bill may facilitate the development of networks that are inefficient or poorly integrated. In the context of 3 Waters, responsive planning is likely to create pressure for either small-scale, stand-alone water and wastewater treatment, reticulation, and disposal systems that are disconnected from metropolitan networks, or for long network extensions to service rezoned rural land distant from existing urban boundaries. Both outcomes are significantly less cost-effective and less infrastructure-efficient than intensification of existing urban areas, rezoning within urban limits, or development at defined urban–rural boundaries.
4. DCC operating cost data shows that:
  - Producing water for small-scale rural schemes is typically 4.5 times more expensive than for metropolitan systems.
  - Treating and disposing of wastewater is approximately 7.5 times more expensive for rural schemes than urban equivalents.

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 DunedinCityCouncil  @DnCityCouncil

5. Dunedin's context illustrates the importance of a strong focus on long-term infrastructure efficiency. The city faces a substantial programme of required 3 Waters upgrades and relatively modest growth, with growth able to be accommodated within existing zoned areas. Under the Bill, there is a risk that developers may propose infrastructure that is not required from a network efficiency perspective, yet Councils may be required to endorse it if it is technically compatible with existing systems. This creates a pathway for inefficient greenfield infrastructure or poorly integrated networks, resulting in higher long-term operational and maintenance costs and reduced network performance. Ultimately, these costs are likely to be borne by existing and future ratepayers.

**Recommendation 1:** DCC recommends that decision criteria and guidance for use of IFF tools require clear demonstration of whole-of-life infrastructure efficiency and long-term affordability, rather than focusing narrowly on enabling development at pace.

***B. The practical operation of “growth pays for growth” and the need for location-specific charging***

6. DCC observes that the costs of servicing growth vary sharply by location, including due to topography, land stability, distance from existing networks, and existing urban form. This is particularly evident across three waters and transport where additional capacity upgrades may be required for new growth areas.
7. DCC also observes that “growth pays for growth” functions most effectively when higher-cost growth areas bear higher costs. DCC supports the beneficiaries-pay model underpinning the IFF framework, however it is important that beneficiaries are clearly defined and levy charges are transparent and affordable.

**Recommendation 2:** DCC recommends that the Bill and associated guidance support transparent, cost-reflective, location-specific cost recovery approaches so that higher-cost locations can bear higher costs, and cross-subsidy is minimised.

***C. Council decision-making and long-term liability management***

8. DCC observes that unanticipated or out-of-sequence development proposals can materially affect infrastructure funding, sequencing and delivery. This is because network infrastructure is planned and delivered as an integrated system: the location and timing of growth influences when upgrades are required, the scale and configuration of those upgrades, and whether assets can be delivered efficiently as part of a coherent programme. Where development proceeds ahead of planned servicing, councils can face pressure to bring forward upgrades, expand scope, or adopt interim solutions that are less efficient than planned investments. It can also lock councils into investment pathways that are shaped by the immediate requirements of a particular growth proposal, rather than by a longer-term optimisation of network performance, affordability, and risk. In practice, this can translate into higher capital costs, higher operating and maintenance costs, and reduced flexibility in future years.



9. DCC also observes that where infrastructure is delivered privately (or through bespoke arrangements), councils can face significant long-term exposure if roles, standards and acceptance processes are not clear. Even where the initial intent is that “growth pays”, councils may still inherit liabilities through later integration into public networks, through expectations of ongoing service continuity, or through asset handover and maintenance arrangements. This exposure is most acute where the infrastructure was not designed to consistent standards, where quality assurance is incomplete, or where responsibilities for renewal and long-term performance are ambiguous.
10. DCC therefore emphasises the importance of council “priority” in practice: the ability to protect the integrity of core networks, apply consistent infrastructure standards, manage investment sequencing within affordability constraints, and avoid inheriting liabilities where infrastructure delivery sits outside standard assurance and asset acceptance processes. This is a mechanism for protecting long-term public value from infrastructure investment and for ensuring that communities are not left funding remediation, retrofits, or long-run maintenance burdens arising from early-stage decisions made under development pressure.
11. DCC further notes that meaningful council decision-making is closely connected to the credibility of “growth pays for growth”. Where councils can manage location, timing, and standards—and can decline proposals that impose disproportionate or inefficient servicing costs—cost recovery tools can function as intended and price signals can guide development toward infrastructure-efficient locations. Where that decision-making role is weakened, cost recovery tools can become a partial remedy at best, because the system may still be required to accommodate inefficient locations, fragmented networks, or upgrades that must be delivered regardless of value-for-money.
12. DCC supports increased use of IFF tools under appropriate Council oversight however recognises the increased administrative burden and technical expertise required to assess and endorse infrastructure proposals, overseeing levy collection and ensuring compliance.

**Recommendation 3:** DCC recommends that implementation settings preserve meaningful council ability to apply infrastructure efficiency and affordability tests to unanticipated or out-of-sequence proposals, including where servicing would require disproportionate upgrades, create inefficient network outcomes, or materially affect long-term rates.

**Recommendation 4:** DCC also recommends that councils are not placed in a position of inheriting long-term maintenance and renewal liabilities without clear oversight, enforceable standards, and robust acceptance processes for any assets that connect to or become part of public networks.

***D. Accelerated pathways and the quality and integration of private infrastructure***

13. DCC observes that accelerated consenting pathways can create practical challenges where private infrastructure is delivered at speed but will ultimately connect to public networks or is expected to meet public service standards. In those cases, integration and quality assurance is central to long-term network performance and to managing public liabilities.



14. DCC notes the importance of ensuring councils have a practical role in confirming infrastructure standards and network integration requirements, and that asset acceptance or vesting is linked to enforceable performance and quality criteria. Clear responsibilities for operation, maintenance and renewal also reduce uncertainty and protect long-term outcomes.

**Recommendation 5:** DCC recommends that the Bill's implementation settings ensure councils are meaningfully consulted on infrastructure standards and network integration, and that any acceptance/vesting of assets is subject to enforceable criteria that protect network integrity and long-term maintainability.

***E. Workability of financing tools: mixed benefits, timing constraints, and equitable settings***

15. DCC observes that many infrastructure projects deliver both private and public benefits, creating funding challenges for the public share. Existing mechanisms are constrained by planning and budgeting cycles: development contributions typically require inclusion in the Long-Term Plan (updated every three years). A more permissive development environment can increase the frequency of these timing issues.

16. A recent Dunedin example illustrates these constraints in submitter-proposed growth areas. Four landowners sought a relatively large urban boundary expansion likely to require infrastructure upgrades, with a transition zone applied subject to technical studies including stormwater management and discharge to a flood-prone waterway. An integrated transport assessment identified an intersection upgrade outside the site with public and private benefits and funding was included in the Long-Term Plan. At the point of requesting the transition zone uplift, the landowner identified internal roading as having public benefits and requested a council funding contribution. Because this public component was identified too late for inclusion in the Long-Term Plan, identifying a timely and reliable mechanism for the public share became a significant delivery challenge.

17. DCC also observes that overall system coherence matters for households and councils. Clear alignment between IFF levies and targeted rates in principle and treatment becomes particularly important if wider policy settings such as rates capping interact with area-based charging. DCC further observes that smaller rural townships outside the main urban area can face very high per-property servicing costs, and that full cost pass-through may become prohibitive and effectively prevent development.

**Recommendation 6:** DCC recommends that financing mechanisms be simple to implement, adaptable, and capable of providing timely and reliable funding for the public share of mixed-benefit infrastructure; that the relationship between IFF levies and targeted rates be clearly coherent in principle and treatment; and that councils retain discretion to cap or discount charges in small townships where full cost pass-through would be prohibitive.



### Conclusion

18. DCC's position centres on managed growth, infrastructure efficiency, and long-term affordability. A planning and financing environment that prioritises responsiveness can push growth into costly-to-service locations, fragment three waters networks, and increase long-run operating and maintenance costs, with sustained impacts for rates and housing affordability.
19. DCC supports the principle that growth should pay for growth, subject to two conditions: council discretion to decline proposals that are inappropriate or inefficient to service, and the availability of effective and flexible financing mechanisms to fund the infrastructure required to support growth, including the public benefit component.
20. DCC seeks a framework that enables location-specific cost recovery so high-cost growth areas bear higher costs, avoiding broad cross-subsidy and protecting both ratepayers and efficient developments from the consequences of poorly located urban expansion.

Nāku noa, nā



Sophie Barker  
**MAYOR OF DUNEDIN**  
**TE KOROMATUA O ŌTEPOTI**

## **DUNEDIN CITY COUNCIL SUBMISSION ON THE LOCAL GOVERNMENT (INFRASTRUCTURE FUNDING) AMENDMENT BILL**

Department: City Development, Finance and Corporate Policy

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### **EXECUTIVE SUMMARY**

- 1 This report seeks approval of a draft Dunedin City Council (DCC) submission on the partial exposure draft of the Local Government (Infrastructure Funding) Amendment Bill, and the associated Supporting Growth Through a Development Levies System consultation document. The draft submission is attached as Attachment A.
- 2 The proposed development levy regime is intended to strengthen councils' ability to fund growth-related infrastructure in a fair and transparent way, and to provide greater predictability for the development sector.
- 3 The draft DCC submission is broadly supportive of the development levy proposals, and considers that these represent an improvement on the present regime of development contributions.
- 4 The approach taken in the draft DCC submission builds on and endorses the submission made by Taituarā — Local Government Professionals Aotearoa (Taituarā), which is attached as Attachment B. The draft DCC submission highlights and replicates the recommendations from the Taituarā submission, along with some additional background specific to the Dunedin context.
- 5 Submissions close on 20 February 2026.

### **RECOMMENDATIONS**

That the Committee:

- a) **Approves** the draft Dunedin City Council Submission on the partial exposure draft of the Local Government (Infrastructure Funding) Amendment Bill.
- b) **Authorises** the Chief Executive to make any minor editorial amendments to the submission.

### **BACKGROUND**

- 6 The development levies consultation proposes replaces the existing development contributions as a mechanism to recover growth-related infrastructure costs from development.

## DISCUSSION

- 7 DCC supports reform that strengthens councils' ability to fund growth-related infrastructure in a way that is fair to existing communities, transparent to the public, and predictable for the development sector. The existing development contributions regime was intended to operate in a more predictable planning environment and resource management reform has created new fast track approval pathways and long term is likely to result in a more permissive and responsive planning environment than is currently the case under the Resource Management Act 1991 (RMA). As a result, development contributions are no longer a fit for purpose mechanism to ensure growth pays for growth. The DCC agrees that the development levies proposal will generally improve this situation.
- 8 The DCC submission: endorses the matters and recommendations in the attached Taituarā submission; includes a number of relatively minor recommended amendments aimed to improve the Bill; and also suggests improvements to the high-cost overlay method are required to reduce risk of litigation.

## OPTIONS

- 9 Two options are presented in this report for Council's consideration.

**Option One – Approve and submit DCC's draft submission on the consultation (Recommended Option)**

*Advantages*

- Enables DCC to demonstrate support for the changes proposed but also seek meaningful changes that will improve the effectiveness of the mechanisms for supporting cost-effective infrastructure delivery for DCC.

*Disadvantages*

- None identified.

**Option Two – Do not submit on the consultation**

*Advantages*

- None identified.

*Disadvantages*

- DCC loses the opportunity to participate in the design of the proposed development levies system.

## NEXT STEPS

- 10 Any final amendments to the draft submission will be incorporated following any additional Council direction.
- 11 Subject to Council approval, the submission will be finalised, and submitted to the Department of Internal Affairs by 20 February 2026.

## Signatories

Author:	Bede Morrissey - Policy Planner Tony Nelmes - Project Accountant Berkay Kocak - Policy Analyst
Authoriser:	Dr Anna Johnson - Manager City Development Carolyn Allan - Chief Financial Officer David Ward - General Manager, 3 Waters, Property and Urban Development

## Attachments

Title	Page
<a href="#">↓A Dunedin City Council Submission on the Local Government (Infrastructure Funding) Amendments Bill</a>	29
<a href="#">↓B Taituara Submission on Development Contributions</a>	33

## SUMMARY OF CONSIDERATIONS

### ***Fit with purpose of Local Government***

Approving the draft submission supports the purpose of local government by enabling the Council to participate in national policy development on reforms that may materially affect local infrastructure funding, growth delivery, and the distribution of costs between existing ratepayers and new development. The decision supports democratic local decision-making by ensuring DCC can formally communicate Dunedin's experience and concerns, including the need for workable, transparent settings and clarity on how development levies will interact with other reforms such as potential rates capping and resource management changes. It also supports community well-being by advocating for settings that protect long-term affordability and infrastructure sustainability while maintaining public confidence in fairness and accountability.

### ***Fit with strategic framework***

	Contributes	Detracts	Not applicable
Social Wellbeing Strategy	<input type="checkbox"/>	<input type="checkbox"/>	✓
Economic Development Strategy	<input type="checkbox"/>	<input type="checkbox"/>	✓
Environment Strategy	<input type="checkbox"/>	<input type="checkbox"/>	✓
Arts and Culture Strategy	<input type="checkbox"/>	<input type="checkbox"/>	✓
3 Waters Strategy	✓	<input type="checkbox"/>	<input type="checkbox"/>
Future Development Strategy	✓	<input type="checkbox"/>	<input type="checkbox"/>
Integrated Transport Strategy	✓	<input type="checkbox"/>	<input type="checkbox"/>
Parks and Recreation Strategy	✓	<input type="checkbox"/>	<input type="checkbox"/>
Other strategic projects/policies/plans	✓	<input type="checkbox"/>	<input type="checkbox"/>

The decision relates to approving a submission on central government legislation and does not directly implement or amend Council strategies. However, the outcome of the legislation will have impacts on the provision and funding of council infrastructure, and is therefore of relevance to a number of council strategies.

### ***Māori Impact Statement***

There are no known direct impacts for Māori arising from the development levies consultation itself; however, the subsequent development levies policy settings (including how levy areas are defined, what infrastructure programmes are funded, and how any remissions criteria are designed and reported) may have indirect impacts for Māori, particularly in relation to **Auora (Mauri)** through effects on the wellbeing of land and waterways, **Autikaka (Tapu/Noa)** through protection of resources/places and customary practice, and **Autakata (Whakapapa)** through place-based connections and intergenerational wellbeing.

### ***Sustainability***

There are no implications for sustainability.

### ***LTP/Annual Plan / Financial Strategy /Infrastructure Strategy***

Approving the submission does not amend the LTP, Annual Plan, Financial Strategy, or Infrastructure Strategy. However, the proposed development levy regime will have significant future implications for how growth-related infrastructure is funded and programmed.

**SUMMARY OF CONSIDERATIONS*****Financial considerations***

There are no direct financial costs associated with approving the submission. However, the proposed development levy regime will have significant future implications for how growth-related infrastructure is funded and programmed.

***Significance***

This decision is of low significance as it relates to approving a consultation submission rather than adopting a new Council policy or committing expenditure.

***Engagement – external***

There has been no external engagement, however the draft DCC submission endorses the content and recommendations from Taituarā's submission on the Bill.

***Engagement - internal***

There has been no internal engagement.

***Risks: Legal / Health and Safety etc.***

There are no material legal or health and safety risks associated with approving the submission.

***Conflict of Interest***

No conflicts of interest have been identified.

***Community Boards***

There are no specific implications for Community Boards.



29/01/2026

Department of Internal Affairs

Email: [development.levies@dia.govt.nz](mailto:development.levies@dia.govt.nz)

Closing date: 20 February 2026

**DUNEDIN CITY COUNCIL SUBMISSION ON THE CONSULTATION ON THE LOCAL GOVERNMENT (INFRASTRUCTURE FUNDING) AMENDMENTS BILL - DEVELOPMENT LEVIES**

Tēnā koutou,

1. The Dunedin City Council (DCC) welcomes the opportunity to submit on the partial exposure draft of the Local Government (Infrastructure Funding) Amendment Bill – Development Levies (the Bill)<sup>1</sup> and the associated Supporting Growth Through a Development Levies System consultation document<sup>2</sup>.
2. DCC supports reform that strengthens councils' ability to fund growth-related infrastructure in a way that is fair to existing communities, transparent to the public, and predictable for the development sector. DCC agrees that the existing development contributions regime is no longer fully fit for purpose, particularly as it was intended to operate in a more predictable planning environment. Highlighting that resource management reform is likely to result in a far more permissive and responsive planning environment than is currently the case under the Resource Management Act 1991 (RMA), this submission broadly supports the development levies proposal, and considers that this will generally provide improvements over the existing development contributions regime.

**Dunedin context**

3. Dunedin's growth and development patterns reflect the realities of a city with established urban areas, significant infill development opportunities, greenfield opportunities primarily located around the edge of the existing urban areas, and complex and varied infrastructure constraints across neighbourhoods and settlements. DCC's experience is that the infrastructure implications of development can differ significantly, and will often differ by location based on: variable availability of different 3 waters infrastructure in outlying townships and settlements, network capacity in different parts of the urban environment, and locations-specific constraints particularly the ability to effectively manage stormwater.
4. Dunedin faces significant infrastructure challenges in relation to its 3 waters network. Many of the constraints stem from the age of the city's infrastructure, inflow and

<sup>1</sup> [Exposure-draft-of-Local-Government-\(Infrastructure Funding\)-Amendment-Bill-for-consultation.pdf](#)

<sup>2</sup> [Development-levies-consultation-document-26-Nov-2025.pdf](#)



infiltration into the city's wastewater network during high rainfall events, and the increasing effects of climate change on 3 waters infrastructure. A significant capital programme is planned to help address these issues, however there is no quick or easy fix, and considerable time and expenditure is required.

5. The way growth infrastructure is delivered and funded has direct implications for:
  - a) development feasibility and housing supply,
  - b) the fairness of cost distribution between existing and new residents,
  - c) the ability to effectively undertake long-term planning and infrastructure sequencing, and
  - d) the ability to maintain service levels in the context of wider financial pressures and potential rate capping.
6. Accordingly, DCC therefore supports a levy regime that improves the ability to accurately recover growth-related costs, while providing transparency, consistency, and fair treatment across different development types and localities.

**Key principles DCC considers essential to the development levies regime**

7. DCC suggests that there are several key principles that should be at the forefront of the development levies regime. These are:
  - Growth should pay for growth;
  - The system should provide transparency and predictability;
  - The system should provide for variation and adaptability to local contexts; and
  - The system should provide for cost effective implementation and administration.
  - The system (alongside the planning system) should encourage and promote growth infrastructure that is cost-effective to deliver and operate, as far as practicable.

**Comments on the draft Bill, and the submission from Taituarā**

8. DCC supports and endorses the matters and recommendations made in the submission on the Bill and consultation document from Taituarā — Local Government Professionals Aotearoa (Taituarā). In particular, DCC draws attention to the following topics and recommendations, all of which are detailed further in the Taituarā submission.
9. DCC broadly supports the transitional arrangements, but considers that the draft Bill should be amended to include explicit provisions allowing for the repeal of development contributions on and from the 1 July 2030. DCC also recommends that the Government extend the transitional arrangements on development contributions to also include financial contributions under the RMA. It is noted that this would also require amendments to either the Planning Bill or the Natural Environment Bill.



10. The Bill does not contain discussion on earlier Government proposals regarding the use of targeted rates. DCC recommends that the draft Bill be amended to include provisions that extend the powers to set targeted rates on developments to ensure that the growth pays for growth principle extends to not just initial capital spend but also on-going operational spend, where appropriate, and in circumstances where new infrastructure may need to be retrofitted to an existing community, for example by adding water or wastewater services to an existing community that does not currently have this service. This is to ensure the cost of that new service is fairly distributed between existing and new development.
11. DCC recommends that the draft Bill be amended, to make it clear that the Crown should not be exempt from development levies.
12. The development levies policy provisions could benefit from a number of matters of clarification, as outlined in the Taituarā submission. DCC endorses these recommendations.
13. Additional guidance should be provided around the circumstances in which high-cost overlays are an option to use. This is a matter that is of key concern to DCC, as high-cost overlays are the key mechanism to ensure that growth areas that have high infrastructure servicing costs pay a fair proportion of these costs. DCC notes that clause 211J(1) of the Bill allows for local authorities to use high-cost overlays if the location has a 'substantial' difference in the growth costs of providing a leviable service within the levy area. DCC requests that clarity is provided on exactly what constitutes 'substantial', as this will likely be a key matter of contention between councils and developers, and is a matter that carries a high risk of litigation. The Bill ideally should include a methodology that outlines when this overlay is appropriate to use, and detail of how it should be applied that is clear and easy to apply and understand so as to reduce the risks (and associated costs) of litigation.
14. Caution is needed in standardising units of demand, as detailed in the Taituarā submission.
15. The draft Bill creates some uncertainties regarding the use of development levies for reserves and community infrastructure. DCC recommends that amendments are made to ensure alignment with the Reserves Act, clear statutory definitions, transparent cross-boundary funding tests and a broadened scope consistent with existing community infrastructure obligations.
16. DCC recommends that any local authorities who are wanting to remit development levies must clearly and publicly set out the objectives of remission in their development levies policy, together with the reasons for expecting the ratepayer to meet that cost. This should include situations for existing outlying settlements where development levies would, if not remitted or limited, present a disproportionate cost relative to the price of land or housing in that community, effectively preventing growth in that settlement.
17. DCC supports the Government's 'in principle' decision that the Commerce Commission will act as the regulator of development levies.



**Conclusion**

18. DCC thanks the Department of Internal Affairs for the opportunity to submit on the draft Bill. DCC welcomes ongoing engagement with the Department of Internal Affairs and other agencies as the Bill progresses. DCC is available to meet with officials to discuss practical implementation issues and to contribute to the development of guidance, templates, and implementation support materials.

Ngā mihi,

Nāku noa, nā



Sophie Barker

**MAYOR OF DUNEDIN**  
**TE KOROMATUA O ŌTEPOTI**

***Supporting Growth through a Development Levies System***  
***Submission of Taituarā – Local Government Professionals Aotearoa***

***What is Taituara?***

Taituarā — Local Government Professionals Aotearoa (Taituarā)<sup>1</sup> thanks the Department of Internal Affairs (the Department) for the opportunity to submit in regard to the Supporting Growth through a Development Levies System discussion document ('DLS') and the draft Local Government (Infrastructure Funding) Amendment Bill (the Bill).

***Taituara offers managerial and technical insights and perspectives into the policy process.***

Taituarā is Aotearoa New Zealand's leading membership network for professionals working in and for local government. Our thriving membership base consists is drawn from chief executives, managers, and staff across all 78 local authorities.

What unites Taituarā members is our commitment to being our professional best, supporting local government excellence through connection, collaboration, and care for the well-being of our communities.

Taituarā strengthens the local government sector by leveraging our members' insight and experience to shape the public policy debate. In this instance, we offer the perspectives of those who plan network and community infrastructure networks and advise local authorities on the funding and financing of those networks.

Promoting sustainable urban growth is fundamental to resolving some of the public policy challenges of the 21<sup>st</sup> century – including housing supply, environmental sustainability and economic development.

All of these objectives are dependent on the getting the right 'pricing' signals i.e. a regime that signals to developers what the true costs of their development decisions. This includes some of those involved in the initial development that led to the enactment of development contributions back in 2025.

Taituarā supports the intent of the DLS proposals, and agrees with much of the way in which it has been translated into the draft Bill. The points we make in the remainder of this submission should be taken as matters of clarification and refinement. We congratulate the Government and the Department for this major enhancement to infrastructure funding.

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<sup>1</sup> Taituarā is the trading name of the New Zealand Society of Local Government Managers (SOLGM). c

***The current development contributions regime is no longer fit for purpose.***

In the words of one experienced practitioner “development contributions work best when you’re (a local authority) is adding infrastructure to support a new suburb or subdivision. It doesn’t work where you’ve got development happening everywhere – infill, out of sequence and the like.”

We agree with comments in the regulatory impact statement that the current regime was designed for a more predictable planning environment, where local authorities had higher level of growth over when and where growth occurs, and could more readily predict growth. The regime relies on local authority’s being able to plan in advance, and include the relevant infrastructure projects in their long-term plan, development contributions policy. Meeting the obligations of the NPS-UD, MDRS and a generally more permissive planning regime in the Planning Bill.

This is likely to exacerbate an already existing underrecovery of the costs of growth. The regulatory impact statement itself highlights the result of what it calls a ‘high level snapshot’, with councils projecting some \$19.5 billion in capital expenditure to meet additional demand, but only \$8.5 billion in recovery through existing tools.<sup>2</sup>

This echoes findings from the Infrastructure Commission’s report *Paying it Back*.<sup>3</sup> In five of the seven major metropolitan/high growth centres revenues sourced from growth are not projected to cover the costs associated with growth over the next ten years. In four of those five councils, half or less of the growth related costs are recovered, in general the more rapid the growth the greater the degree of under-recovery.

Where underrecovery occurs councils are left to fund infrastructure from other revenue sources – predominantly rates. The RIS notes that this provides weak incentives for councils to invest in growth-supporting infrastructure, which in the words of one commentator encourages councils to view growth as a cost rather than a benefit.

We’d also observe that the proposed rate model will further constraints on the ability of councils to fund growth infrastructure – better support for a ‘growth pays for growth’ approach is essential. A properly functioning development levies system is essential if the Government wishes to pursue both rate-capping and achieve its housing supply objectives.

<sup>2</sup> Department of Internal Affairs (2025), *Supplementary Analysis Report Improving Local Government Infrastructure Funding Settings*, page 10.

<sup>3</sup> Infrastructure Commission (2025), *Paying it back: An examination of the fiscal returns of public infrastructure investment*, page 26.

We understand that some of the development community have expressed concerns that *"the shift to development levies could increase charges for developers and have a negative impact on development."*<sup>4</sup> This is a genuine perception that has shaped previous policy design – for example, in the 2012 decisions to limit the range of community infrastructure that development contributions could be used to fund.

Yet the regulatory impact cites two pieces of evidence that suggest that an increase in the share that developers pay does not necessarily mean an increase in house prices. Work commissioned by Auckland Council regarding the economics of increasing development contributions for the proposed Drury development found that charges could not be passed forward in prices but would be passed back through decreases in land value.

The New South Wales Productivity Commission found that *"Contributions do not necessarily add to the final price of new housing. The maximum price achievable for a new apartment or dwelling will be determined to a large degree by the broader housing market, with consideration of the unique characteristics of the property and its location. When a contribution is levied, to the extent that the broader housing market and characteristics of the dwelling are no different, the maximum price achievable for the dwelling would remain unchanged."*

*Instead, the amount of the contribution should theoretically be reflected in land values. When developers bid for a parcel of land, they will typically calculate the 'residual value' of the land based on the estimated revenue achievable from sales, less the range of costs, taxes and charges involved with delivering the development, and a profit margin. The 'residual' then reflects the value of the land to the developer and will inform any bid that it is willing to make. Provided that the residual land value is still higher than its opportunity cost (or next best use) to the vendor, it is still in the owner's interest to sell."*<sup>5</sup>

We also noted DLS stated that where local authorities are able to provide credible pricing signals in advance, the levies will 'feed back' into land prices rather than forward into house prices. We agree.

***The proposals in DLS and the draft bill are a step forward on the present regime of development contributions***

Table One below summarises the key features of the proposed development levies

<sup>4</sup> Minister of Local Government (2025), *Going for Housing Growth: Release of Consultation Document and Exposure Draft Bill on Development Levies*, paper to the Cabinet Economic Policy Committee, page 5.

<sup>5</sup> New South Wales Productivity and Equality Commission (2020), *Review of Infrastructure Contributions in New South Wales*, page 33.

regime as compared with the present regime of development contributions.<sup>6</sup> In almost every respect the proposals offer improvements over the present regime.

**Table One: Key features of the development levies proposals compared with development contributions**

Aspect	Development Levies (DLs)	Development Contributions (DCs)
Nature of Change	A charge for development across a wider area.	Location-specific charge, requiring a tight link between identified infrastructure projects in a defined growth area, and specific developments which benefit from that infrastructure.
Geographic Scope	Applies across larger areas, covering entire communities or service networks (eg transport).	Applies to specific developments benefiting from identified infrastructure projects.
Basis of Calculation	Aggregate cost of providing infrastructure capacity for growth across the levy area.	Cost tied to specific sites and identified capital projects.

<sup>6</sup> Simpson Grierson (2025), *Development Contributions vs Development Levies: What's changing and why it matters*, retrieved from <https://www.simpsongrierson.com/insights-news/legal-updates/development-contributions-vs-development-levies-what-s-changing-and-why-it-matters> on 3 December 2025.

Cross-Subsidisation	Possible within the levy area due to aggregated approach.	No cross-subsidisation; costs are tightly linked to benefiting developments.
Planning Approach	Council plans for sufficient infrastructure capacity to support predicted growth within the levy area.	Council predicts growth in specific areas and plans infrastructure accordingly.
Cost Recovery Method	Every unit of growth in the levy area pays a share of expected infrastructure capacity cost.	Costs recovered only if growth forecasts for specific areas are accurate.
Certainty of Projects	Does not require identification of specific projects; focuses on overall capacity.	Requires identified and costed projects with a high degree of certainty.

***With one exception, the transitional arrangements are an appropriate response to concerns expressed by local authorities and developers.***

DLS proposes a phase-in of powers to assess development levies, and a consequent phase-out of DCs. Assuming passage of the Bill then local authorities will be able to assess the first levies from 1 July 2028, with DCs ceasing from 1 July 2030.

This is sensible for two reasons. Ministers have decided that regulation of development levies should apply from 'day one' of the new regime, thus requiring lead time for the development of this regulation. With passage of the legislation unlikely before early 2027, 1 July 2028 appears a reasonable start point.

And from the local authority standpoint, the development and implementation of a development levies policy (and the removal of DCs) involves a considerable investment of time and resources. Among other things this includes the review of a

revenue and financing policy, alongside giving effect to the requirements of the NPS-UD and the spatial plan (again required by late 2028 on present timetables).

Having said that, we cannot see any provision in the draft Bill that repeals DCs. We submit that the Bill should unequivocally provide for the ultimate repeal of DCs. If these remain an option, there will be strong incentives for the development community to lobby councils to continue using DCs and to lobby central government not to proceed with the repeal.

There is one important issue that DLS is silent on. There is a second tool that can be used to fund the capital costs of growth – financial contributions under the Resource Management Act 1991. There are a small number of local authorities that have never made the change to the present regime of development contributions – generally smaller local authorities that made substantial investments in getting financial contributions “up and running”.<sup>7</sup>

We will also be making a similar point in our submission on the Planning Bill and the Natural Environment Bill. As best we can see there is no reference to financial contributions in either Bill (even of a transitional nature), and no obvious provision for an equivalent tool.

DLS made some very good points about the transitional cost and time involved in moving from the development contributions regime to development levies. Imagine then the cost and resource involved in having to introduce two regimes!

**Recommendations**

- 1. That the draft Bill be amended to include provisions allowing for the repeal of development contributions on and from 1 July 2030.**
- 2. That the Government extend the transitional arrangements on development contributions to include financial contributions under the Resource Management Act 1991. This will also require the insertion of a transitional provision empowering the collection of financial contributions to 1 July 2023 into either the Planning Bill or the Natural Environment Bill.**

<sup>7</sup> Local authorities that still make use of financial contributions as a tool for funding growth include Napier City Council, Western Bay of Plenty District Council, Masterton District Council and South Wairarapa District Council.

***DLS and the draft bill do not give effect to a significant element of the Government's previous policy decisions.***

The Government's package of announcements last February indicated that the Government was also intending to amend the powers to assess targeted rates to support development. Our understanding was that these powers were to be targeted to smaller or lower growth councils and were intended to allow for the assessment of targeted rates at the subdivision stage. The associated Cabinet papers contained no further detail other than there was some degree of ring-fencing to the development areas.

We could find no reference to these powers in either DLS or the draft Bill. The regulatory impact statement is also silent on targeted rates, other than some passing references to the current use of targeted rating powers.

This is an important addition to the toolkit for those local authorities that are small or are not currently anticipating enough future growth to warrant the cost of establishing and administering either of the development levies or development contributions regimes. We have seen nothing indicating that this work has been abandoned, but nor have we seen any suggestion that the work is in progress.

**Recommendation**

**3. That the draft Bill be amended to include provisions that extend the powers to set targeted rates on developments.**

***The case for a Crown exemption is no better than the case for an exemption on development contributions.***

We understand that the intent is that development levies will not bind the Crown i.e. with some limited exemptions, agencies such as the Ministry of Education etc will not be liable for levies.

While not surprising, this is disappointing nevertheless. The cabinet paper and regulatory impact statement make much of the need for credible pricing signals to provide for efficient development of infrastructure networks. The Crown is one of the largest developers in New Zealand. An infrastructure project such as a new school or hospital can create the demand at least the equal of a subdivision if not a small town. An exempting itself the Crown effectively expects other developers and/or the ratepaying public to subsidise its land use decisions.

In discussions in the lead-up to this Bill officials told us that Crown Law had asserted the constitutional principle that the Crown is not subject to tax. Of course, that is to ignore that a levy is actually more in the nature of a charge to help meet the costs that development imposed (and courts have previously ruled in this way on development contributions).

The case is further weakened as the Government's policy decision to establish a regulator. This provides the Crown with an additional protection against any over-recovery. Additionally the Crown would have the same rights to request reconsideration or lodge an objection as any other developer, in addition to having more financial capacity than many to seek judicial review.

**Recommendation**

4. **That a clause be added to the draft Bill which would create a new section 8(2)(ba) of the Local Government Act 2002 adding subparts 5 and 5A of Part 8. The effect of this is to ensure that both development contributions and development levies are assessable on Crown developments.**

***The development levies policy provisions would benefit from clarification.***

The development levies policy largely replicates the requirements of a development contributions policy, with one or two differences for context. We raise some matters of clarification and to give better effect to the policy decisions.

A development levies policy must describe the key elements out of each the financial and infrastructure strategies that are pertinent to the council's approach to development levies. One of the likely implications of this requirement is that local authorities would need to include information about any of the infrastructure that they will seek a development levy for in these strategies. At the present time both strategies need only include information about roads and footpaths. Local authorities do not have to, and some do not, include information about parks and reserves, and other community infrastructure in these strategies.

DLS envisages that local authorities and water organisations would have access to development levies to fund growth-related costs for the three water services. But there is an impediment in that clauses 1(a)(i) and (ii) require statements of the key elements of the financial and infrastructure strategies pertinent to development levies.

It is unclear how those local authorities that deliver water services 'in-house' would do this. The Local Government (Water Services) Act 2025 (LGWSA) prohibits the inclusion of any information about water services in either document and in the wider LTP. The Bill may inadvertently prohibit those local authorities who provide water services from accessing development levies to fund those services.

Substantially the same information is required in the water services strategies required under the LGWSA. The development levies policy should therefore refer to the key elements of water service strategies

We note that the Local Government (Water Services) Act will also need some amendment to allow water organisations access to the development levies in much the same way as this legislation provided specific powers to set development contributions. The draft Bill appears to have 'left space' for such amendments on page 31.

The draft Bill requires disclosure of the significant forecasting assumptions underpinning the policy and how they differ from any used in other relevant documents. We suspect that policy-makers actually intend that the relevant documents are the infrastructure strategy, financial strategy, regional spatial strategies, future development strategy and any other land-use plans per the proposed new section 110(1)(a)(iii). With the exception of water services strategies as noted above we suspect that first three matters in this subclause would be sufficient and that these should be specified.

It also seems more transparent for local authorities that are using different significant forecasting assumptions from other documents be required to explain the differences.

The proposed new section 110(1)(c) requires local authorities to summarise the considerations that underlie the determination of the levy areas. But with one exception, local authorities are limited to a single levy area. This provision appears relevant only to Auckland Council (which Cabinet decisions propose be required to operate more than one levy) and should be amended thus.

Development levies policies are one of the suite of so-called 'section 102' funding and financial policies. Section 102 requires that certain of these policies must support the principles set out in the preamble to Te Ture Whenua Māori Act 1993 – including the development contributions policy. The preamble refers to objectives such as the retention of Māori land in Māori ownership, supporting Māori to use their land and the like. We can find no equivalent requirement on the development levies policy. We'd have expected that there would be such a requirement as the

levies policy is intended to achieve similar policy objectives to, and ultimately replace the development contributions policy

**Recommendations****That:**

5. **clause seven of the draft Bill be amended by adding a new limb to the proposed section 110A(1)(a) that requires the policies to describe the relevant provisions of the water services strategy relevant to development levies if the local authority provides those services**
6. **the proposed section 110A(1)(a)(v) be amended to link back to the documents listed in 110A(1)(a)(i) to (iii) and water services strategies (if these are delivered by local authorities)**
7. **the proposed section 110A(1)(a)(v) be amended to require local authorities to explain any differences between the significant forecasting assumptions used in the policy and in any of the planning documents or strategies used in the plan**
9. **the proposed section 110A(1)© be amended to limit its application to Auckland Council alone**
10. **a new clause be added to the Bill that amends section 102(#A) of the Local Government to clarify that a development levies policy must also support the principles in the preamble to Te Ture Whenua Māori Act 1993.**

***Could more guidance be given around the circumstances in which high-cost overlays might be an option?***

DLS proposes to provide local authorities with the ability to treat particular locations within a levy area as a high-cost overlay if the location has 'substantially' higher costs to service growth. This is important as the high cost overlay sends a better overall pricing signal for developers wishing to locate in areas that carry a particularly high cost, while maintaining the overall coherence of the regime elsewhere in the levy area.

Sector experience with development contributions has shown that they are prone to litigation. We suspect that decisions to establish high-cost overlay areas will be an area that becomes a focal point of challenge. It is also theoretically possible that a group of developers might challenge a local authority's decision that an area ought not be treated as a high cost-overlay. The test should be clear and easy to apply and understand.

We are uncertain that the term 'substantial' used in the proposed clause 211J is sufficiently clear. Substantial is not a term that appears anywhere else in the Local Government Act 2002. As far as we know substantial is not used in any of the case law.

The dictionary definition of substantial relevant to this context is "having considerable size, importance or worth". This appears similar to the term significant which is a term used throughout the Local Government Act to connote something with a high degree of importance. Local authorities must set out their criteria, thresholds or procedures for assessing whether a matter is significant in a significance and engagement policy.

**Recommendation**

- 11. That the proposed new section 211J be amended by replacing the term 'substantial' with the term 'significant'. This links the criteria for establishing a high cost overlay to an already existing statutory test that local authorities must already have a policy on.**

***Caution is needed in standardising units of demand.***

Page 35 of DLS proposes setting a list of development types in regulation with standard metrics for setting units of demand. We support the objectives of "reduc(ing) the administrative burden on councils, minimise disputes over levy calculations and give developers greater certainty when operating across different areas".

But care is needed in the selection of these metrics. For example, DLS suggests basing the unit of residential demand for most services on the number of bedrooms (e.g. one bedroom would be equivalent to 0.33 of a unit, 4 or more would be 1.33 bedrooms). Some local authorities have expressed concerns about this metric being both open to gaming and difficult to administer e.g. we recall one of the participants at last May's workshop commenting that his residence had one bedroom, and three studies!

***DLS and the draft Bill may create some uncertainties regarding their use for reserves and community infrastructure.<sup>8</sup>***

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<sup>8</sup> Note: We are grateful to the staff of Tasman District Council for drawing these matters to our attention.

The drafting of the provisions relating to reserves and community infrastructure (particularly clauses 211Q–211S and associated definitions). As written, these clauses appear to materially narrow the range of reserve types and purposes recognised under the Reserves Act 1977, and risk excluding important community infrastructure functions routinely funded and delivered by local authorities—including local purpose reserves, esplanade reserves, historic and cultural reserves, cemeteries, stormwater and other utility reserves.

The draft also introduces ambiguity around cross-boundary expenditure and the use of levies outside a territorial authority's district, which presents practical, governance and accountability issues for unitary authorities such as Tasman District. Without clarification, the combined effect may restrict councils' ability to acquire and develop land needed to support growth, fulfil statutory duties and meet community expectations for local parks, open spaces, heritage protection and ecological networks. We therefore request amendments to ensure alignment with the Reserves Act, clear statutory definitions, transparent cross-boundary funding tests and a broadened scope consistent with existing community infrastructure obligations.

***We are doubtful of the policy rationale for remission of a development levy.***

DLS will carry through an existing power of remission (permanent foregoing) of charges on development, provided that the remission observes the conditions and criteria in the policies on development levies. The DLS proposals have been put forward as providing credible and predictable pricing signals to developers, and thus that growth pays for growth. Remissions work against this intent, by foregoing revenue from levies, all things being equal some shift to the ratepayer would ensue.

Local authorities should be explaining to their community what the objectives of any remission actually are, and the reasons why the local authority considers the ratepayer should meet the cost. That would then be reinforced with obligations to disclose the remitted levies in the annual report and alongside the objectives met (there are similar requirements in remitted rates).

A point of detail, we could not see anything in the draft Bill that requires local authorities to disclose the amounts remitted in the annual report. We observe that the equivalent requirements on rates are located in the Local Government (Rating) Act 2002 as opposed to the Local Government Act.

We also noted that, unlike development contributions, the Bill has not provided for the postponement of a development levy, where local authorities have powers to postpone a development contribution. We are uncertain as to whether this was intentional or not. As a general rule, we don't favour postponement of this charge of whatever form it takes, in that postponement transfers some of the financial risk of

development to the local authority (especially as it does not come with the authority to charge a fee to meet the financial and economic cost of postponement).

**Recommendation**

**12. That local authorities wanting to remit development levies must set out the objectives of remission in their development levies policy together with the reasons for expecting the ratepayer to meet that cost.**

***The Commerce Commission appears best placed to fulfil any role as the regulator of development contributions.***

The Government has taken an 'in principle' decision that the Commerce Commission will act as the regulator of development contributions. If there is to be a regulator then we agree that the Commerce Commission is the appropriate body to fulfil this role.

Previous work undertaken by the Ministry of Business, Innovation and Employment for water reform suggests that smaller economies tend to co-locate the economic regulation of different sectors together. New Zealand does with energy, telecommunications, groceries, and now water services. Various Australian states take a similar approach. Larger economies or those with ready access to skills are more likely to establish stand-alone sector specific economic regulators. The United Kingdom is an example of such an approach.

We observe that the Commission has recently acquired a role as the economic regulator of water services. And appears likely to acquire a role as the regulator of rates under the current proposals to introduce a rates band from 2029. The Commission will therefore already be acquiring institutional knowledge of local government finance and the sector's approach to delivering infrastructure. The Commission will be asking local authorities for similar information to regulate rates as it would for development contributions.

Section 52A of the Commerce Act 1986 provides the Commission with a statutory purpose for the regulation of goods and services:

*"The purpose of this Part is to promote the long-term benefit of consumers in markets referred to in section 52 by promoting outcomes that are consistent with outcomes produced in competitive markets such that suppliers of regulated goods or services—*

- (a) *have incentives to innovate and to invest, including in replacement, upgraded, and new assets; and*
- (b) *have incentives to improve efficiency and provide services at a quality that reflects consumer demands; and*
- (c) *share with consumers the benefits of efficiency gains in the supply of the regulated goods or services, including through lower prices; and*
- (d) *are limited in their ability to extract excessive profits."*

There appears to be some synergy network between this purpose and the overall purpose of development levies – essentially to ensure that an efficient level of development occurs through the right pricing signals.

We do not favour establishing a stand-alone economic regulator. Such an office would need a critical mass of regulators to function and would draw on a small pool of skills in economic regulation. We see establishing a separate entity as unnecessary cost and duplication of resources.

## **DUNEDIN CITY COUNCIL SUBMISSION ON THE EMERGENCY MANAGEMENT BILL (NO 2)**

Department: Corporate Policy

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### **EXECUTIVE SUMMARY**

- 1 The purpose of this report is to seek approval of a draft Dunedin City Council (DCC) submission to the Governance and Administration Committee on the Emergency Management Bill (No. 2) (the Bill). The draft DCC submission is attached as Attachment A.
- 2 The Dunedin City Council (DCC) plays a key role as a territorial local authority as the Civil Defence and Emergency Management (CDEM) controller for the city of Dunedin.
- 3 The DCC also plays a key role in CDEM planning and response in the Otago region, as a partner in the management and implementation of the Otago Civil Defence and Emergency Management Group Plan 2018 -2028 (the Group Plan) along with the Otago Regional Council and other local authorities in Otago.
- 4 The Bill replaces the current Civil Defence and Emergency Management (CDEM) Act 2002. It gives effect to the Government's response to the 2023 Inquiry into severe North Island weather events.
- 5 The proposed changes in the Bill seek to:
  - strengthen the role of communities and iwi Māori in emergency management
  - provide clear responsibilities at the national, regional, and local levels
  - enable a higher minimum standard of emergency management
  - minimise disruption to essential services
  - ensure agencies have the tools to do their jobs effectively during an emergency.
- 6 In response to requests from submitters, and in light of recent events, the Governance and Administration committee has agreed to extend the deadline for submissions on the Bill to 15 February 2026.

## RECOMMENDATIONS

That the Committee:

- a) **Approves** the Dunedin City Council submission, with any amendments, to the Governance and Administration Committee on the Emergency Management Bill (No. 2).
- b) **Authorises** the Chief Executive to make any minor editorial amendments to the submission.
- c) **Authorises** the Mayor or delegate to speak at any hearings.

## BACKGROUND

- 7 In 2023, central government held an Inquiry (the Inquiry) into the response to the North Island Severe Weather Events that occurred that year.
- 8 The Inquiry found that Aotearoa New Zealand's emergency management system is not fit for purpose and change is required.
- 9 A discussion paper following the Inquiry was released in April 2025 and submissions were opened. The DCC did not submit as this consultation was specific to the North Island.
- 10 This Bill results from that consultation and the resulting Cabinet Paper, strengthening emergency management decisions on legislative reform, released in July 2025.
- 11 The Cabinet Paper identifies the most significant proposal in the Bill as:
  - clarifying roles and accountabilities
  - improving CDEM Group plans, and input into them
  - representation on Coordinating Executive Groups (CEG)
  - expanding tools to improve assurance (i.e. through rules or Compliance Orders)
  - expanding infrastructure providers that should be recognised under the legislation.
- 12 The DCC submitted on an earlier Emergency Management Bill in October 2023. This was introduced by the previous government but never progressed beyond the submission stage, due to timing factors such as a change of government and running parallel to severe weather events and the Inquiry.

## DISCUSSION

### The DCC Submission

- 13 The DCC submission addresses issues including: expectations of councils and chief executives; funding; climate adaptation and infrastructure; expectations of iwi Māori and communities; and how new emergency management legislation will align with other proposed changes and reform currently being consulted on by central government.
- 14 The DCC notes that its partnership role with other local authorities in the Group Plan becomes auditable and enforceable under the proposed changes and seeks clarity around the statutory expectations of this should the Bill be enacted.
- 15 The DCC notes that the proposals in the Bill materially change the expectations of councils, Chief Executives, and governance arrangements, and seeks clarification on how these arrangements will be designed and implemented in practice.
- 16 The statutory expectations on councils are significantly increased through the proposed changes in the Bill. The Regulatory Impact Statement prepared for consideration alongside the Bill notes that there will be an estimated \$82.8 million in costs for local government if the proposed changes are enacted, which are largely unfunded in the modelling for the Bill.
- 17 In addition to queries about how funding shortfalls will be reconciled, the DCC submission also seeks clarification on how councils will be supported by central government to implement the proposed changes in the Bill, including how new requirements are monitored and evaluated, and any potential repercussions for councils if expectations are not met.
- 18 The DCC submission notes, with concern, that this Bill is open for consultation at the same time as a number of other central government consultations, including the Planning Bill, Natural Environment Bill, rates-capping model, and Simplifying Local Government (which will have a direct effect on regional councils). The DCC seeks information and assurance on how these pieces of legislation and government reform initiatives will align with each other once enacted.
- 19 The DCC submission supports increased engagement with iwi Māori and communities that are disproportionately affected by emergencies, including rural communities, disabled people and older people, but seeks clarification about how expectations of this engagement will be managed and supported by central government, and how involvement in CEG will work at a practical level.
- 20 The DCC notes that the emergency management reform, which is the purpose of the Bill, has as one of its objectives “strengthening the role of iwi Māori in emergency management”, however there is no reference to the Treaty of Waitangi in the Bill itself. The DCC asks that the Bill be amended to include the Treaty.
- 21 The DCC submission notes that the DCC has a strong and active commitment to preserving the unique heritage of Ōtepoti Dunedin. It is concerned to see that the proposal in the Regulatory Impact Statement prepared for the Bill — to enable secondary legislation to support improved recovery planning for taonga Māori and other cultural heritage — has not been included in the Bill itself and would like to see the Bill amended to include this.

## OPTIONS

### **Option One – Approves the Dunedin City Council draft submission on the Emergency Management Bill (No. 2)**

22 That Council approves the Dunedin City Council draft submission on the Emergency Management Bill (No. 2).

#### *Advantages*

- Opportunity to participate in discussions about national legislation that will have direct impact at a local level for Ōtepoti Dunedin and its residents.
- Opportunity to advocate for the unique perspective and requirements of Ōtepoti Dunedin in decisions around emergency management planning and resourcing.
- Opportunity to present the Dunedin City Council's view on proposed changes to legislation that have potential implications for its financial management and planning processes.

#### *Disadvantages*

- There are no identified disadvantages to this option.

### **Option Two – Does not approve the Dunedin City Council draft submission on the Emergency Management Bill (No. 2)**

23 That Council does not approve the Dunedin City Council draft submission on the Emergency Management Bill (No. 2).

#### *Advantages*

- There are no identified advantages for this option.

#### *Disadvantages*

- Missed opportunity to participate in discussions about national legislation that will have direct impact at a local level for Ōtepoti Dunedin and its residents.
- Missed opportunity to advocate for the unique perspective and requirements of Ōtepoti Dunedin in decisions around emergency management planning and resourcing.
- Missed opportunity to present the Dunedin City Council's view on proposed changes to legislation that have potential implications for its financial management and planning processes.

## NEXT STEPS

24 If Council approves the draft submission on the Emergency Management Bill (No. 2), with any amendments, DCC staff will provide it to the Governance and Administration Committee before 15 February 2026.

**Signatories**

Author:	Brandy Saxton - Senior Advisor - Climate Adaptation and Resilience
Authoriser:	Mike Costelloe - General Manager, Arts, Culture & Economic Development

**Attachments**

	<b>Title</b>	<b>Page</b>
<a href="#"><u>1A</u></a>	draft Dunedin City Council submission on the Emergency Management Bill (No. 2)	54

**SUMMARY OF CONSIDERATIONS**
***Fit with purpose of Local Government***

This decision enables democratic local decision making and action by, and on behalf of communities. This decision promotes the social, economic, environmental, and cultural well-being of communities in the present and for the future.

***Fit with strategic framework***

	Contributes	Detracts	Not applicable
Social Wellbeing Strategy	✓	<input type="checkbox"/>	<input type="checkbox"/>
Economic Development Strategy	✓	<input type="checkbox"/>	<input type="checkbox"/>
Environment Strategy	✓	<input type="checkbox"/>	<input type="checkbox"/>
Arts and Culture Strategy	<input type="checkbox"/>	<input type="checkbox"/>	✓
3 Waters Strategy	✓	<input type="checkbox"/>	<input type="checkbox"/>
Future Development Strategy	✓	<input type="checkbox"/>	<input type="checkbox"/>
Integrated Transport Strategy	✓	<input type="checkbox"/>	<input type="checkbox"/>
Parks and Recreation Strategy	<input type="checkbox"/>	<input type="checkbox"/>	✓
Other strategic projects/policies/plans	✓	<input type="checkbox"/>	<input type="checkbox"/>

The submission aligns with the DCC's Heritage Action Plan, Waste Management and Minimisation Plan, and Te Taki Haruru, the DCC's Māori Strategic Framework, Otago Civil Defence and Emergency Management Group Plan 2018 -2028.

***Māori Impact Statement***

Te Taki Haruru, the DCC's Māori Strategic Framework, includes the theme of Autūroa and its principles that "Māori are leaders in the management of our natural resources and built environment" and that "Māori will participate and demonstrate leadership in the community".

The Bill does not include any reference to the Treaty of Waitangi; the DCC submission requests that the Bill be amended to include this.

The DCC submission supports increased engagement with iwi Māori in emergency management; it seeks more information about how this will be undertaken in practice, including the composition of emergency management groups and how they will be supported to deliver on expectations.

***Sustainability***

Making this submission has no sustainability implications for the DCC.

***LTP/Annual Plan / Financial Strategy /Infrastructure Strategy***

There are potential implications for the Long Term Plan and Annual Plan as changes proposed in the Bill are expected to be managed and funded by local authorities.

***Financial considerations***

There are potential financial implications as changes proposed in the Bill are expected to be managed and funded by local authorities.

***Significance***

This decision is considered low in terms of the Council's Significance and Engagement Policy.

**SUMMARY OF CONSIDERATIONS*****Engagement – external***

The DCC's submission has been informed by a webinar on this topic presented by Simpson Grierson for Taituarā members; a workshop prepared by Otago Regional Council staff for its councillors; the Taituarā draft submission; and the draft submission from the Otago Waste Network, of which the DCC is a member.

***Engagement - internal***

The following DCC teams have contributed to this draft submission: Climate Adaptation and Resilience; Community Partnerships; Corporate Policy; Mana Ruruku; and Waste Management and Minimisation.

***Risks: Legal / Health and Safety etc.***

There are no identified risks.

***Conflict of Interest***

There are no conflicts of interest.

***Community Boards***

There are potential implications for Community Boards as proposed changes in the Bill will affect Community Board areas.



5 February 2026

Governance and Administration Committee  
Parliament Buildings  
WELLINGTON

Via email: [ga@parliament.govt.nz](mailto:ga@parliament.govt.nz)

Tēnā koe

**DUNEDIN CITY COUNCIL SUBMISSION ON THE EMERGENCY MANAGEMENT BILL (NO. 2)**

1. Thank you for the opportunity to submit on the Emergency Management Bill (No. 2) (the Bill).
2. The Dunedin City Council (DCC) plays a key role as a territorial local authority as the Civil Defence and Emergency Management (CDEM) controller for the city of Dunedin.
3. The DCC also plays a key role in CDEM planning and response in the Otago region, as a partner in the management and implementation of the Otago Civil Defence and Emergency Management Group Plan 2018 -2028 (the Group Plan) along with the Otago Regional Council and other local authorities in Otago.

**Submission Summary**

4. The DCC notes that its partnership role with other local authorities in the Group Plan becomes auditable and enforceable under the proposed changes, and seeks clarity around the statutory expectations of this should the Bill be enacted.
5. The DCC notes that the proposals in the Bill materially change the expectations of councils, Chief Executives, and governance arrangements, and seeks clarification on how these arrangements will be designed and implemented in practice.
6. The statutory expectations on councils are significantly increased through the proposed changes in the Bill. The Regulatory Impact Statement prepared for consideration alongside the Bill notes that there will be an estimated \$82.8 million in costs for local government if the proposed changes are enacted, which are largely unfunded in the modelling for the Bill.
7. The DCC seeks more information on how these additional costs will be reconciled, particularly as the Bill is open for consultation at the same time as rates capping options for local councils are being mooted by central government.
8. The DCC also seeks clarification on how councils will be supported by central government to implement the proposed changes in the Bill, including in how new requirements are monitored and evaluated, and any potential repercussions for councils if expectations are not met.

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9. The DCC recognises that the Bill expands the accountability of councils for readiness and preparedness for emergency management, and is concerned that the Bill does not demonstrate how central government will support councils in these expectations.
10. Specifically, the Bill increases financial and reputational exposure for councils, and has direct implications for long term plans, resourcing, and Chief Executive assurance.
11. The DCC identifies a number of risks if emergency management becomes a core activity for local government as proposed in the Bill. At a high level, these include: governance and funding, compliance and assurance, and capacity across councils to deliver on new expectations. The DCC requests information on how central government will support local authorities in mitigating risks arising from new mandated emergency management obligations.
12. The DCC is committed to the Treaty of Waitangi and its principles. It notes that the Treaty of Waitangi is not included in the Bill and requests that the Bill be amended to reference it.
13. The DCC notes with concern that the Bill is open for submissions alongside a tranche of other, related government legislation such as the Natural Environment, Planning, and Public Works Act Amendment Bills. The DCC seeks assurance that if these Bills are enacted, central government will take a joined-up approach to the implementation of any changes and how these affect local authorities.
14. The DCC also notes that the Bill is open for submissions at the same time as the Simplifying Local Government consultation. It seeks clarification about how enactment of new emergency management requirements at a regional and local level will be reconciled with any changes to regional council governance and management.

**Stronger Engagement for Communities and Iwi Māori**

15. The DCC supports mandatory engagement with Māori and disproportionately affected communities. It strengthens the role of iwi and hapū in Emergency Management Committees and Coordinating Executive Groups. This aligns with Treaty of Waitangi principles and Te Taki Haruru, the DCC's Māori Strategic Framework. It is consistent with the approach the DCC is taking with its citywide climate resilience framework, which emphasises equitable outcomes, community engagement, partnering with mana whenua, and a just transition.
16. The DCC strongly supports the recognition that some communities (Māori, rural, or otherwise) face greater risks to emergencies. Furthermore, having representatives within these communities that can feed information and specialist knowledge to the wider Emergency Management Committee is also strongly supported.
17. DCC supports and notes that the Bill formalises central governments understanding of the nature and value of the knowledge Māori communities have about the areas they whakapapa to and reside in.

18. The DCC requests information as to what resource support looks like for representatives on the Emergency Management Committee before, during, and after an emergency.
19. In the development of regional management plans, DCC recommends altering "...engage with and involve representatives of iwi and Māori..." to "working in partnership with hapū, iwi, and Māori" as working with these communities to strengthen them is an on-going commitment.
20. Additionally, DCC advises including hapū in the partnership/engagement would be appropriate to account for different iwi and their respective structures on who to work with at the regional level depending on the size and significance of the emergency.
21. The DCC would like confirmation on who specifically would be an appropriate member within "...Co-ordinating Executive Group member with knowledge of the interests and values of local Māori communities". Specifically, if they would be mana whenua, mātāwaka, or anyone deemed to have knowledge of that area, in regard to clause 39(2)(f) of the Bill.
22. The DCC would like clarification around who would be considered as hapū/iwi representatives. That is, would it be hapū, rūnaka, rūnaka chairs, iwi rūnaka, iwi chairs, or another entity/group/person.
23. The DCC also enquires if this role would be separate from the rural community's role, or if these roles could be undertaken by the same person.
24. The DCC supports the acknowledgement in the Bill that the hardest effect of natural disasters is on our most vulnerable communities.
25. The DCC supports the requirement for emergency management leadership (the Director-General of Emergency Management and Emergency Management Committees) to directly engage with representatives from these specific communities, as previously this hasn't always happened in a coordinated way and can be very reactive, despite any training and pre-planning having occurred.
26. The DCC supports the community engagement aspects outlined in Section 94 of the Bill. It requests further detail of how emergency plans will be executed in practice, and how the non-compliance part of the legislation will be enforced.

**Risk Reduction Emphasis**

27. The DCC supports the Bill's stronger emphasis on risk reduction than the current Civil Defence and Emergency Management Act 2002, specifically stating that the functions of Emergency Management Committees include identifying, assessing and coordinating the management of hazards and risks. This reinforces the DCC's climate adaptation and resilience objectives. It supports the collaborative approach the DCC is taking with the citywide climate resilience framework in Ōtepoti Dunedin

**Clarity of Roles and Modernisation**

28. The DCC supports how the Bill clarifies roles and responsibilities between levels of government and essential infrastructure providers. It allows for concurrent declarations if more than one event was to affect an area at the same time. Most critically, it provides civil

liability protection for issuing warnings and requires taking a precautionary approach to risk despite uncertainty. Those two provisions will facilitate implementation of the citywide climate resilience framework by removing potential legal barriers to future climate actions by council.

#### **Resourcing and Capacity**

29. The DCC is concerned that the Bill places new duties (equity engagement, animal management, offer management, compliance reporting) on local government. Central government has not indicated that it intends to offer any support for implementation costs or training. This concern is amplified because this Bill is just one of many legislative changes currently re-shaping local government. The combined effect is to significantly increase requirements on council, while reducing local control and spending authority – in effect requiring council to do significantly more with even fewer resources.

#### **Ministerial Planning Standards and Direction Powers**

30. The Bill grants the responsible Minister the authority to issue regional emergency planning standards. While the DCC sees benefit in a consistent planning approach across regions and minimum requirements that will raise the quality of emergency management plan, it recognises there is a risk that the proposed language will result in one-size-fits-all standards that do not reflect local hazard profiles. Requirements intended to raise the quality of plans may become a ceiling rather than a floor – unduly limiting the scope of regional emergency management plans.

#### **Compliance Orders and Enforcement Powers**

31. The Bill provides the Director-General of Emergency Management with broad powers to serve compliance orders to enforce or prevent contravention of legislative requirements. The DCC agrees that accountability is important, but is concerned that the Bill could result in central government imposing punitive measures on local government without addressing systemic funding and capability gaps that prevent compliance. The DCC recommends a more collaborative compliance approach that would work to address those gaps before enforcement.

#### **Chief Executive Responsibilities**

32. The Bill requires the chief executive of a local authority to coordinate resources for emergency management purposes at all times (not just when there is a state of emergency or transition period in force). While the DCC supports greater emphasis on preparedness, this requirement will have significant operational impact. The DCC recommends central government provide guidance to clarify the scope of this requirement and funding to support its implementation.

#### **Essential Infrastructure Obligations**

33. The Bill requires the providers of essential infrastructure to maintain emergency response plans and contribute to developing sector response plans as required by the Director-General of Emergency Management. It also requires essential infrastructure providers to

ensure their infrastructure is able to function to the fullest possible extent during and after an emergency. DCC is an essential infrastructure provider as defined in Schedule 3 of the bill (providing roading and water services). The DCC recommends further clarity on this requirement and guidance on its application, particularly given the Bill's approach to compliance and enforcement.

34. The DCC is aware that Ōtepoti Dunedin's essential infrastructure requires or will require resilience upgrades to fully meet this standard. The DCC is developing a citywide climate resilience framework, which will guide prioritisation and planning the city's climate adaptation and resilience responses. It recommends that central government provide national co-investment for resilience upgrades to avoid disproportionate burden on ratepayers.
35. The DCC is concerned that The absence of waste services from Schedule 3 of the Bill represents a significant gap in emergency preparedness and recommends that waste services be included as critical infrastructure in Schedule 3 of the Bill.

**Animal Management Requirement**

36. The Bill requires regional emergency management plans to include arrangements for managing animals during an emergency. While the DCC support this requirement in principle, it raises practical challenges if local government is made responsible for the transport, housing and care of livestock and domestic animals during an emergency. The DCC recommends central government provide guidance and funding to support implementation of this provision.

**Taonga Māori and Other Cultural Heritage**

37. The DCC has a strong and active commitment to preserving the unique heritage of Ōtepoti Dunedin. It is concerned to see that the proposal in the Regulatory Impact Statement prepared for the Bill — enable secondary legislation to support improved recovery planning for taonga Māori and other cultural heritage — has not been included in the Bill itself and would like to see the Bill amended to include this.

**Transition Timelines**

38. The Bill contains multiple provisions that commence within 6 or 12 months after Royal Assent. Again, the DCC's concern is amplified because this Bill is just one of many legislative changes currently re-shaping local government. The DCC recommends central government provide transitional support and establish realistic timeframes for plan reviews and engagement given the cumulative pressure on councils already managing multiple reforms.

**Conclusion**

39. Thank you again for the opportunity to provide feedback on this consultation.
40. The DCC would welcome the opportunity to provide feedback at any hearings on the Emergency Bill (No. 2), and to participate in any relevant engagement with how new emergency management legislation can be effectively implemented by local government.

Nāku noa, nā



Sophie Barker  
**MAYOR OF DUNEDIN**  
**TE KOROMATUA O ŌTEPOTI**

DRAFT

## ITEMS FOR CONSIDERATION BY THE CHAIR

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Any items for consideration by the Chair.

## KARAKIA WHAKAMUTUNGA

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The meeting will close with a Karakia Whakamutunga.