DUNEDIN CITY COUNCIL | kaunihera a-rohe o Ōtepoti

Notice of Meeting:

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

Date:	**Thursday 22 October 2026**
Time:	**9.00 am**
Venue:	**Council Chamber, Level 2, Dunedin Public Art Gallery, The Octagon, Dunedin**
YouTube Link:	https://www.youtube.com/live/heSIYDGyPhM

Richard Briggs
Chief Executive Officer

Policy and Planning Committee

PUBLIC AGENDA

MEMBERSHIP

Chairperson	Mayor Sophie Barker	
Deputy Chairperson	Cr Cherry Lucas	
Members	Cr John Chambers	Cr Jo Galer
	Cr Christine Garey	Cr Doug Hall
	Cr Marie Laufiso	Cr Russell Lund
	Cr Mandy Mayhem	Cr Andrew Simms
	Cr Mickey Treadwell	Cr Lee Vandervis
	Cr Steve Walker	Cr Brent Weatherall
	Ms Nadia Wesley-Smith	Prof Emma Wyeth
Senior Officer	Paul Henderson, General Manager Corporate and Regulatory Services	
Governance Support Officer	Rebecca Murray	

Rebecca Murray
Governance Support Officer

Telephone: 03 477 4000
governance.support@dcc.govt.nz
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.

Public Forum registrations close at 9.00am on Wednesday 21 October. Members of the public wishing to speak to the Policy and Planning Committee please contact the Governance Support Team at governance.support@dcc.govt.nz or alternatively phone 03 477 4000.

3 APOLOGIES

An apology has been received from Mayor Sophie Barker.

That the Committee:

Accepts the apology from Mayor Sophie Barker.

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

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 or independent representative and any private or other external interest they might have.

2. Elected or independent 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 or Independent Members' Interest Register attached as Attachment A; and

b) **Confirms/Amends** the proposed management plan for Elected or Independent Members' Interests.

Attachments

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Policy and Planning Committee Interest Register October 2026				
Name	**Responsibility (i.e. Chairperson etc)**	**Declaration of Interests**	**Nature of Potential Interest**	**Member's Proposed Management Plan**
Mayor Sophie Barker	Shareholder	Ayrmed 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.
	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	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 Avisory 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.
	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	Dunedin Chinese Garden Advisory Group (Council Appointment)	No conflict Identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr John Chambers	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	Ōtākou 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.
	Member	Hereweka Harbour Cone Trust (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 John Chambers (cont)	Member	Okia Reserve Management Committee (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	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 Jo Galer	Owner	Residential Property	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	Southern Heritage Trust	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Shareholder	Various International Managed Funds	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Shareholder	Various individual shares	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Co-Lead	Heritage Portfolio (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	Hereweka Harbour Cone Trust (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Theomin Gallery Management Committee (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	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.
	Shareholder	Various NZ,US shares and Crypto	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.

Name	Responsibility (i.e. Chairperson etc)	Declaration of Interests	Nature of Potential Interest	Member's Proposed Management Plan
Cr Marie Laufiso (cont)	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	Saddle Hill Community Board (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.
	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	Taieri 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.
	Deputy Lead	Infrastructure Portfolio (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-Taieri Community Board (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 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.
	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.
	Co-Lead	Heritage Portfolio (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	Otago Theatre Trust (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Cr Mandy Mayhem	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	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.

Name	Responsibility (i.e. Chairperson etc)	Declaration of Interests	Nature of Potential Interest	Member's Proposed Management Plan
Cr Mandy Mayhem (cont)	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.
	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	Creative New Zealand Grants Advisory Panel (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.
	Member	Blueskin Bay Watch	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 Ralliart NZ - 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.

Name	Responsibility (i.e. Chairperson etc)	Declaration of Interests	Nature of Potential Interest	Member's Proposed Management Plan
Cr Andrew Simms (cont)	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 Mickey Treadwell	Director	Atawhai Interactive Tapui Ltd	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.
	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 contract 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.

Name	Responsibility (i.e. Chairperson etc)	Declaration of Interests	Nature of Potential Interest	Member's Proposed Management Plan
Cr Steve Walker (cont)	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	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.
	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.
	Lead	Infrastructure Portfolio (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Dunedin Public Art Gallery Acquisitions Committee (Council Appointment)	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 Communtiy Board (Council Appointment)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Ms Nadia Wesley-Smith	Trustee	Dunedin Writers and Readers Festival	No Conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Iwi Representative	Sustainable Destinations – Piopiotahi Programme Board	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
Ms Nadia Wesley-Smith (cont)	Interim Chair	Kōkiri Training Centre	No Conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Property Owner	Residential Property Owner	No Conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Trustee	Tatane Alex Tarewai Wesley Whānau Trust	No Conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
Prof Emma Wyeth	Trustee and Chair	WellSouth Primary Health Network	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director & Deputy Chair	Te Tauraki Limited	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Executive member & Deputy Chair, Registered member	Kāti Huirapa Rūnaka ki Puketeraki	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Director	Dunedin After Hours Doctors Limited	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	New Dunedin Hospital Project Steering Group	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Representative	Kāti Huirapa Rūnaka ki Puketeraki – Te Rūnanga o Ngāi Tahu	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Member	Te Pae Māori	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Board member	Health Research Council of New Zealand	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Shareholder	Tumu Korero Ltd (consultancy)	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Employee	University of Canterbury	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Owner	Residential property in Ōpoho, Dunedin	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Owner	bare rural land in Karitāne	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.
	Registered member	Te Rūnanga o Ōtākou	No conflict identified	Seek advice prior to the meeting if actual or perceived conflict of interest arises.

CONFIRMATION OF MINUTES

POLICY AND PLANNING COMMITTEE MEETING - 20 AUGUST 2026

RECOMMENDATIONS

That the Committee:

a) **Confirms** the public part of the minutes of the Policy and Planning Committee meeting held on 20 August 2026 as a correct record.

Attachments

	Title	Page
A⇩	Minutes of Policy and Planning Committee meeting held on 20 August 2026	15

DUNEDIN CITY COUNCIL | kaunihera a-rohe o Ōtepoti

Policy and Planning Committee

MINUTES

Minutes of an ordinary meeting of the Policy and Planning Committee held in the Council Chamber, Level 2, Dunedin Public Art Gallery, The Octagon, Dunedin on Thursday 20 August 2026, commencing at 9.00 am

PRESENT

Chairperson	Mayor Sophie Barker	
Members	Cr John Chambers	Cr Jo Galer
	Cr Christine Garey	Cr Doug Hall
	Cr Marie Laufiso	Cr Russell Lund
	Cr Mandy Mayhem	Cr Mickey Treadwell
	Cr Lee Vandervis	Cr Steve Walker
	Cr Brent Weatherall	Prof Emma Wyeth (via Zoom)

IN ATTENDANCE Paul Henderson (General Manager Corporate and Regulatory Services), Scott MacLean (General Manager City Services), Mike Costelloe (General Manager Arts Culture and Economic Development), Antony Deaker (Team Leader Economic Development), Heath Ellis (Group Manager Parks and Recreation), Simon Spiers (Team Leader Regulation Management - Transport), and Gina Hu'akau (Manager Community Partnerships) and Danielle Tolson (Policy Analyst)

Governance Support Officer Rebecca Murray

1 KARAKIA TIMATANGA

Mayor Sophie opened the meeting with a Karakia Timatanga.

2 PUBLIC FORUM

There was no Public Forum.

3 APOLOGIES

Apologies were received from Cr Cherry Lucas, Cr Andrew Simms and Ms Nadia Wesley-Smith.

Moved (Mayor Sophie Barker/Cr Steve Walker):

That the Committee:

Accepts the apologies from Cr Cherry Lucas, Cr Andrew Simms and Ms Nadia Wesley-Smith.

Motion carried (PAPCC/2026/019)

4 CONFIRMATION OF AGENDA

Moved (Mayor Sophie Barker/Cr Steve Walker):

That the Committee:

Confirms the agenda without addition or alteration.

Motion carried (PAPCC/2026/020)

5 DECLARATIONS OF INTEREST

Members were reminded of the need to stand aside from decision-making when a conflict arose between their role as an elected representative and any private or other external interest they might have.

Moved (Mayor Sophie Barker/Cr Steve Walker):

That the Committee:

a) **Notes** the Elected or Independent Members' Interest Register; and

b) **Confirms** the proposed management plan for Elected or Independent Members' Interests.

Motion carried (PAPCC/2026/021)

6 CONFIRMATION OF MINUTES

6.1 POLICY AND PLANNING COMMITTEE MEETING - 18 JUNE 2026

Moved (Mayor Sophie Barker/Cr Steve Walker):

That the Committee:

Confirms the minutes of the Policy and Planning Committee meeting held on 18 June 2026 as a correct record.

Motion carried (PAPCC/2026/022)

PART A REPORTS

7 UPDATE REPORT ON THE DUNEDIN ECONOMY FOR THE YEAR TO MARCH 2026

The report provided an overview of Dunedin's economic performance to 31 March 2026, including key economic indicators and trends, and highlighted comparative data for Dunedin, selected cities, and national results.

The General Manager Arts, Culture and Economic Development (Mike Costelloe), Team Leader Economic Development (Antony Deaker) and via Zoom Infometrics Principal Economist and Lead Demographer (Nick Brunsdon) spoke to the report and responded to questions.

Moved (Mayor Sophie Barker/Cr Christine Garey):

That the Committee:

Notes the Update Report on the Dunedin Economy for the Year to March 2026.

Motion carried (PAPCC/2026/023)

8 TOWN BELT ACTIVE TRAVEL TRIAL SUMMARY REPORT

The report provided the results of the Town Belt Active Travel Trial and outlined community feedback on potential future vehicle access arrangements for Queens Drive and Braid Road.

The General Manager City Services (Scott MacLean), Group Manager Parks and Recreation (Heath Ellis) and Team Leader Regulation Management - Transport (Simon Spiers) responded to questions.

Moved (Mayor Sophie Barker/Cr Steve Walker):

That the Committee:

Adjourns the meeting for two minutes.

Motion carried

The meeting adjourned at 10.25am and reconvened at 10.27am.

Moved (Mayor Sophie Barker/Cr Christine Garey):

That the Committee:

Adjourns the meeting for two minutes.

Motion carried

The meeting adjourned at 10.38am and reconvened at 10.39am.

Moved (Mayor Sophie Barker/Cr Steve Walker):

That the Committee:

Adjourns the meeting for two minutes.

Motion carried

The meeting adjourned at 10.41am and reconvened at 10.42am.

Cr Brent Weatherall left the meeting at 10.43am.

Moved (Mayor Sophie Barker/Cr Christine Garey):

That the Committee:

Adjourns the meeting for two minutes.

Motion carried

The meeting adjourned at 10.45am and reconvened at 10.46am.

Cr Brent Weatherall returned to the meeting at 10.46am.

Moved (Mayor Sophie Barker/Cr Steve Walker):

That the Committee:

Adjourns the meeting for two minutes.

Motion carried

The meeting adjourned at 11.01am and reconvened at 11.02am.

Moved (Mayor Sophie Barker/Cr Steve Walker):

That the Committee:

Adjourns the meeting for two minutes.

Motion carried

The meeting adjourned at 11.19am and reconvened at 11.21am.

Moved (Mayor Sophie Barker/Cr Steve Walker):

That the Committee:

Adjourns the meeting for two minutes.

Motion carried

The meeting adjourned at 11.25am and reconvened at 11.26am.

Following debate on the motion as recommended in the agenda, Cr Jo Galer moved and spoke to an amendment to clause (d) of the motion.

Moved (Cr Jo Galer/Cr Russell Lund):

That the Committee:

d) **Notes** following feedback from the trial, no further trials or changes to walking and cycling access are planned for the Town Belt within the life of the 2027-2037 Long Term Plan and that the $2 million set aside in the budget for this type of work be reconsidered for redistribution as part of the upcoming 10-year plan discussions.

Division

The Committee voted by division

For: Crs Jo Galer, Russell Lund and Lee Vandervis (3).
Against: Crs John Chambers, Christine Garey, Doug Hall, Marie Laufiso, Mandy Mayhem, Mickey Treadwell, Steve Walker, Brent Weatherall, Prof Emma Wyeth and Mayor Sophie Barker (10).
Abstained: Nil

The division was declared LOST by 10 votes to 3.

The amendment was lost and returned to the original motion.

Moved (Cr Marie Laufiso/Mayor Sophie Barker):

That the Committee:

a) **Notes** the findings of the Town Belt Active Travel Trial Final Report

b) **Notes** that the trial was undertaken to provide information relevant to Policy 8.10.1.12 of the Town Belt Reserve Management Plan.

c) **Notes** that the majority of submitters opposed permanent closure of Queens Drive to vehicles.

d) **Notes** that following feedback from the trial, no further trials or changes to walking and cycling access are planned for the Town Belt.

Division

The Committee voted by division

For: Crs John Chambers, Christine Garey, Doug Hall, Marie Laufiso, Russell Lund, Mandy Mayhem, Mickey Treadwell, Lee Vandervis, Steve Walker, Brent Weatherall, Prof Emma Wyeth and Mayor Sophie Barker (12).
Against: Cr Jo Galer (1).
Abstained: Nil

The division was declared CARRIED by 12 votes to 1

Motion carried (PAPCC/2026/024)

9 SUBMISSION - SUMMARY OFFENCES (MOVE-ON ORDERS) AMENDMENT BILL

The report provided information on the Council's submission to the Justice Committee on the Summary Offences (Move-On Orders) Amendment Bill and sought retrospective approval in accordance with the Committee's delegated authority provisions.

Moved (Cr Mickey Treadwell/Mayor Sophie Barker):

That the Committee:

a) **Receives** the submission to the Summary Offences (Move-on Orders) Amendment Bill.

b) **Notes** that the submission was lodged by the Chairperson under delegated authority due to consultation timeframes.

c) **Retrospectively approves** the submission to the Summary Offences (Move-on Orders) Amendment Bill.

Division

The Committee voted by division

For: Crs John Chambers, Christine Garey, Doug Hall, Marie Laufiso, Mandy Mayhem, Mickey Treadwell, Steve Walker, Prof Emma Wyeth and Mayor Sophie Barker (9).
Against: Crs Jo Galer, Russell Lund, Lee Vandervis and Brent Weatherall (4).
Abstained: Nil

The division was declared CARRIED by 9 votes to 4

Motion carried (PAPCC/2026/025)

10 ITEMS FOR CONSIDERATION BY THE CHAIR

Mayor Sophie provided guidance on the application of Standing Orders relating to debate on amendments, including Standing Order 20.12 concerning rights of reply.

11 KARAKIA WHAKAMUTUNGA

Mayor Sophie closed the meeting with a Karakia Whakamutunga.

The meeting concluded at 12.02pm.

.....
CHAIRPERSON

PART A REPORTS

POLICY ON TEMPORARY WATER RESTRICTIONS UPDATE

Department: 3 Waters

EXECUTIVE SUMMARY

1 An El Niño weather event predicted for the summer of 2026/2027 is expected to increase the likelihood of water supply shortages and / or challenges with meeting demand. As part of preparations for managing the effects of the El Niño event on the DCC water supply system, staff recommend updating the DCC Policy on Temporary Water Restrictions 2010 (the 2010 Policy).

2 The 2010 Policy sets out the steps the DCC may take to manage demand by using temporary water restrictions. The 2010 Policy includes a table showing the levels of temporary water restrictions that may be applied. The restriction levels are designed to target non-essential outdoor water use on an increasing scale depending on the severity of the situation.

3 Most of the proposed updates to the policy relate to the temporary water restriction levels table (at Appendix 1 in Attachment A), with adjustments to the preceding policy text to reflect the recently adopted Water Supply Bylaw 2026 as well as language modernisation. The overall aim of the changes is to make the temporary water restrictions requirements for consumers clearer and therefore more effective.

4 The proposed changes include showing within the temporary water restrictions table both the voluntary/summertime restrictions and the highest level of restrictions (Level 4); changing timeframes of some permitted outdoor water activities at Level 1 and Level 2 to between 8pm – 6am, rather than 8pm – 8am; adding alternate day restrictions at Level 2, and the introduction of allowing vegetable garden watering via handheld hose or watering can except during Level 4.

5 To give effect to section 82 (Principles of Consultation) of the Local Government Act 2002, a process was undertaken to give the community the opportunity to provide feedback on the proposed changes. A 'comments wall' was set up on the DCC's website over a period of 10 days for the public to comment on the temporary water restriction levels table. Seven comments were received. This feedback did not result in any changes to the temporary water restriction levels table.

6 This report recommends that the Policy and Planning Committee approves the proposed Policy on Temporary Water Restrictions 2026 (proposed Policy).

RECOMMENDATIONS

That the Committee:

a) **Approves** the proposed Policy on Temporary Water Restrictions 2026 at Attachment A.

BACKGROUND

7 The 2010 Policy (at Attachment B) was adopted by the Council in 2010. The purpose of the policy is to provide a tool for managing water demand at times when water supply is limited or potentially unable to meet demand. The 2010 Policy sets out the circumstances under which Council may impose temporary water restrictions on residential non-essential outdoor water use and the level of restrictions that may be applied. The levels of restriction are designed to target non-essential outdoor water uses on an increasing scale depending on the severity of the water shortage.

8 When the policy was adopted in 2010 it was not assessed as a significant decision. Public consultation was not undertaken prior to adopting the 2010 Policy. The 2010 Policy is 16 years old and has not been updated since being adopted.

9 Earth Sciences New Zealand has confirmed that El Niño conditions have been reached in the tropical Pacific in July 2026 and that a "super" El Niño is expected to strongly influence New Zealand's weather into 2027. As such it is both timely and appropriate to review and update the temporary water restriction levels that form part of the policy.

10 El Niño is a natural climate pattern where sea surface temperatures in the central and eastern Pacific Ocean become warmer than usual. This warmth changes global wind patterns or trade winds (the permanent east-west prevailing winds around the Equator) and these can weaken or even reverse leading to distinct regional weather differences across New Zealand.

11 El Niño typically brings more frequent south westerly and westerly airflow patterns to the South Island, which create drier conditions east of the Southern Alps. As a result, eastern Otago can expect an increased risk of below-average rainfall, warmer and windier dry spells, reduced soil moisture, lower river flows, and a heightened risk of drought during summer.

12 The Otago Regional Council has advised that the developing 2026 El Niño could be significant, with central and eastern Otago particularly vulnerable to hot, windy, and dry conditions that may place pressure on water supplies, irrigation, agriculture, and pasture growth. While occasional heavy rainfall events remain possible, the overall summer pattern is expected to favour drier-than-normal conditions across eastern Otago.

13 The recently adopted Water Supply Bylaw 2026 empowers the Council to use water restrictions to manage high seasonal water use or other demands. The Bylaw also empowers the Council to use water restrictions during an emergency.

14 The table below shows how frequently the 2010 Policy has been used to restrict outdoor water use in the recent past:

YEAR	LOCATION	RESTRICTION LEVEL	PERIOD OF RESTRICTION	REASON FOR RESTRICTIONS
2025/26	-	-	0 days	-
2024/25	Waikouaiti, Karitāne and Hawksbury	Level 1	1 day	Consent requirement due to low river flows

YEAR	LOCATION	RESTRICTION LEVEL	PERIOD OF RESTRICTION	REASON FOR RESTRICTIONS
	Outram	Level 1	3 days	Production capacity limited by raw water quality
2023/24	Port Chalmers	Level 1	66 days	Demand beyond network supply capacity (Port Chalmers plant and pipeline capacity)
	Waikouaiti, Karitāne and Hawksbury	Level 1	9 days	Consent requirement due to low river flows
		Level 2	113 days	
2022/23	Mosgiel	Level 1	49 days	Demand beyond network supply capacity (Mosgiel supply pipeline)
2021/2022	-	-	0 days	

15 The 2010 Policy references a multi-criteria decision-making matrix, which was developed to take into account parameters influencing both water supply and demand when making decisions on the use of temporary water restrictions. The parameters include:

- Raw water catchment yield
- Raw water storage levels
- Treated water storage levels
- Treated water demand (7 day rolling average)
- FENZ fire risk rating
- Actual rainfall (monthly rolling average)
- Forecast rainfall (Metservice and ESNZ)
- Otago Regional Council irrigation restrictions
- Consent compliance (residual flow conditions)

16 Along with the above parameters, staff also consider factors including daily consumption/demand levels in the immediate preceding period; soil moisture content, failure of key facilities; the desirability of reducing water usage on an ongoing basis; the desirability of avoiding excessive reliance on only one water catchment; and the possibility that if restrictions do not sufficiently reduce current water consumption, water available for later supply may be of a quality that is too difficult to treat, leading to a reduced amount of water available to be supplied to the community.

17 Depending on operational requirements, temporary restrictions may be imposed on a city-wide or more localised basis. Wherever possible, temporary restrictions are localised to minimise the inconvenience and disruption to the community.

DISCUSSION

2010 Policy

18 The 2010 Policy's temporary water restriction level table is detailed and complex. It includes lists of outdoor water uses and activities that have restrictions and what those restrictions are between Level 1 to Level 3.

19 The 2010 Policy also refers to voluntary restrictions prior to Level 1 in the policy wording, but this is not reflected in the table. Level 4 restrictions exist and can be determined in accordance with the severity of the situation, but this is not outlined in the body of the policy, nor does it exist in the current temporary water restrictions levels table. It is not clear what Level 4 restrictions are.

Key features of the proposed updated Policy

20 The purpose of the temporary water restrictions levels documented in the table at Appendix 1 of the proposed Policy (at Attachment A) is the same as the 2010 Policy – that is, to progressively reduce residential non-essential outdoor water use through level changes as circumstances require.

21 One of the aims of updating the 2010 Policy is to simplify the information so it is clear to the community the types of outdoor water use activities that will be restricted and how those temporary restrictions will be implemented at each level. The proposed changes reflect how other councils in New Zealand manage temporary water restrictions and communicate this information to their communities.

22 The proposed temporary water restriction levels table includes voluntary/summertime restrictions and outlines Level 4 restrictions. Language across the whole table has been streamlined and made simpler regarding the types of activities the policy refers to, and when they are and are not permitted. Overall, the proposed table has been simplified, is less complicated, and clearer.

23 The temporary water restrictions levels table proposes to change the permitted timeframes for particular outdoor water activities from 8pm – 8am to 8pm – 6am. Changing 8am to 6am is to minimise outdoor uses during the period of heavy indoor water use that occurs across the community each morning (through showering, food preparation, etc.) so as to reduce overall peak water demand on the water supply system at this time of day.

24 An additional element to Level 2 restriction is proposed. Alternate day restrictions are proposed for residential properties depending on users' street address numbers. For example, residents whose street address number is even can use water for outdoor purposes within the restrictions on days with even dates, and odd numbered addresses can use water for outdoor purposes within the restrictions on days with odd dates. This approach is consistent with water restrictions policies in other parts of New Zealand.

25 Restrictions on general outdoor water use for watering of private gardens and lawns has been made clearer in the proposed Policy. The proposed new restrictions are more permissive than

the 2010 Policy by clarifying that vegetable garden watering via handheld hose or by a watering can is an activity that is able to take place in voluntary/summertime restrictions and throughout Levels 1 - 3 (with some restrictions) until it is not permitted in Level 4.

26 For transparency purposes, the proposed Policy also includes the approach the DCC will take to manage water use at its assets and properties in response to each restriction level change to make it clear to the community that DCC, as a water user, is also taking steps to use water responsibly.

27 The proposed Policy also simplifies and makes clear restrictions for non-residential outdoor water uses.

28 The following table provides an overview of the demand management approach, whilst Appendix 1 of Attachment A details the proposed temporary restriction levels:

RESTRICTION LEVEL	BRIEF DESCRIPTION OF THE RESTRICTION
Voluntary/summertime water restrictions	**Voluntary / summertime water restrictions** in place from 1 December to 30 April. Recommends users are sensible and responsible with their outdoor water use. Non-residential water users to operate as usual but asked to be mindful of outdoor water use.
Level 1	**Low Level water restrictions** – for residential users timed usage is in place for sprinklers and handheld hose or watering can use to avoid peak demand. This means these uses are permitted only between 8pm – 6am (except vegetable garden watering via the same means which is permitted any time). All other outdoor water use is permitted at all times but responsible water use is encouraged. Non-residential water users to operate as usual but asked to be mindful of outdoor water use.
Level 2	**Medium level of water restrictions** – residential sprinklers are not permitted to be used at any time; timed usage is in place to avoid peak demand for handheld hose or watering can use on alternate days, including all other outdoor water use. Vegetable garden watering is permitted if using a handheld hose or watering can at any time. Non-residential water users are encouraged to minimise outdoor water use or where possible reschedule outdoor water use until the restrictions are lifted.
Level 3	**High level of water restrictions** – All outdoor water use is not permitted except for handheld watering of vegetable gardens. Non-residential water users are encouraged to minimise outdoor water use or where possible reschedule outdoor water use until the temporary restrictions are lifted.
Level 4	**Extreme level of water restrictions** – all residential properties' outdoor water use is not permitted. Non-residential outdoor water use restrictions will be determined at the time.

Public feedback

29 To give effect to section 82 (Principles of Consultation) of the Local Government Act 2002, the community was given the opportunity to provide feedback on the proposed changes.

30 Public feedback in the form of a 'comments wall' on DCC's website began on 10 September 2026 and closed on 20 September 2026. The comments wall gave the public the opportunity to read the draft temporary water restriction levels table and comment on any topic they wished. Other members of the public were able to "like" the comment, or comment on others' comments.

31 Methods to inform the public about the update to the 2010 Policy included an article for DCC staff on Connect; a news article on the DCC website in Latest News; two social media posts and a social media sponsored ad, and information on the DCC Public Noticeboard published in the Otago Daily Times on Wednesday 16 September 2026.

32 Seven comments were received over the feedback period - please see Attachment C for the comments and feedback results. During the early part of the feedback timeframe a technical error occurred. This was fixed on Tuesday 15 September 2026 however it may have prevented some comments from being posted online.

33 Feedback included a comment on the proposed time change for outdoor water use at Level 1 and Level 2(from 8pm – 8am to 8pm – 6am). The comment supported the change, and two people "liked" that comment. Conversely, one comment suggested that the proposed times would make it difficult for them to water their gardens in the morning – this comment did not receive any "likes" in response.

34 A comment regarding vegetable garden watering was concerned that fruit bushes or trees cannot be watered during temporary restriction levels, only vegetables. 3 Waters staff recommend retaining the term 'vegetable gardens' which is consistent with terminology used by other councils in their water restrictions levels.

35 Another comment supported temporary water restrictions but suggested that Council should over the long term consider rainwater collection systems to collect water for watering gardens – this comment was liked five times, while a separate comment also suggested that rainwater harvesting storage and demand management should be prioritised by the Council (this same commenter also felt frustrated by temporary water restrictions on residents during peak tourism times in the city). The final two comments were about how the restrictions would be notified to the public and temporary water restriction exemptions.

36 The feedback from the public did not result in any changes to the temporary water restriction levels table.

OPTIONS

Option One – Recommended Option - Adopt the proposed Policy on Temporary Water Restrictions with any recommended amendments

Advantages

37 The DCC will have a clear, up-to-date policy on temporary water restrictions to support its response to the effects of the predicted super El Niño event.

38 The proposed policy will help to minimise outdoor water use thereby saving water (with the intention that indoor water uses necessary for drinking, cooking and sanitation will be able to continue as normal).

Disadvantages

39 None identified.

Option Two – Status Quo – do not adopt the proposed Policy on Temporary Water Restrictions and keep the current 2010 version

Advantages

40 No advantages identified.

Disadvantages

41 The current Policy on Temporary Water Restrictions 2010 may not be fit for purpose for managing the effects of the predicted El Niño weather event for the 2026/2027 summer.

42 The current policy may not provide the water savings needed and consequently indoor water use may be compromised.

NEXT STEPS

43 If the proposed Policy is approved, an update to the DCC website will occur to reflect the new policy. Following this the preparation and delivery of a communications campaign about El Niño and the new policy will occur, and the new policy will be implemented if the need for temporary water restrictions arises.

44 In the event of non-compliance with temporary water restrictions, staff will consider enforcement options as they arise, however, any enforcement action will be proportionate to the breach and likely start with education first.

45 Monitoring of the effectiveness of restrictions will inform future updates to the policy.

Signatories

Author:	Katherine Quill - Policy Analyst
Authoriser:	Scott Campbell - Regulation and Policy Team Leader Jared Oliver - Planning Manager John McAndrew - Head of 3 Waters

Attachments

	Title	Page
⇩A	Draft Policy on Temporary Water Restrictions 2026	31
⇩B	Policy on Temporary Water Restrictions 2010	37
⇩C	Feedback Results on Temporary Water Restriction Levels Table	42

SUMMARY OF CONSIDERATIONS

Fit with purpose of Local Government

This decision enables democratic local decision making and action by, and on behalf of communities.

Fit with strategic framework

	Contributes	Detracts	Not applicable
Social Wellbeing Strategy	☐	☐	✓
Economic Development Strategy	☐	☐	✓
Environment Strategy	☐	☐	✓
Arts and Culture Strategy	☐	☐	✓
3 Waters Strategy	✓	☐	☐
Future Development Strategy	☐	☐	✓
Integrated Transport Strategy	☐	☐	✓
Parks and Recreation Strategy	☐	☐	✓
Other strategic projects/policies/plans	☐	☐	✓

This report has been prepared with reference to Dunedin's strategic framework.

Māori Impact Statement

The proposed changes to the Policy on Temporary Water Restrictions is not expected to negatively impact Māori differently to the rest of the population, however, the proposed updates to the policy support efficient use of water resources, which aligns with the cultural importance of water to Māori.

Sustainability

There are no implications for sustainability.

LTP/Annual Plan / Financial Strategy /Infrastructure Strategy

This report and the recommended decision have no immediate direct implications for these plans and strategies.

Financial considerations

There are no immediate direct financial implications.

Significance

This decision has been assessed as low significance in terms of the Council's Significance and Engagement Policy.

Engagement – external

There has been external engagement with the community on the DCC website that ran from 10 September – 20 September asking the community for their comments and feedback on the proposed Temporary Water Restrictions Levels table.

SUMMARY OF CONSIDERATIONS
Engagement - internal Internal consultation has been undertaken with appropriate in 3 Waters staff as well as managers from the DCC Property, Parks and Recreation Services and Fleet departments. Input has been provided during policy drafting and a review of the draft proposed Policy was undertaken and amendments have been made as appropriate.
Risks: Legal / Health and Safety etc. There are no identified risks.
Conflict of Interest There are no identified conflicts of interest.
Community Boards There are no specific implications for Community Boards.

POLICY ON TEMPORARY WATER RESTRICTIONS 2026			
Approved by:			
Sponsor:	Jared Oliver, Planning Manager, 3 Waters		
Department responsible:	3 Waters		
Date approved:		**Reviewed:**	
Next review date:		**DOC ID:**	

PURPOSE

The purpose of the Policy on Temporary Water Restrictions 2026 is to allow for effective and efficient management of short-term issues with the supply and demand balance of reticulated water supplies, and to support the Council to maintain a safe and sufficient supply of drinking water to consumers in accordance with its duties under the Water Services Act 2021.

SCOPE

The Water Supply Bylaw 2026 empowers the Council to use water restrictions when needed to manage demand.

The Council has ongoing programmes to ensure that the strategic balance between water resource availability and community water requirements is maintained. However, there may be occasions when, either through exceptional weather events or operational emergencies, it is necessary to impose water use restrictions to ensure that the community's essential water needs can still be met.

This policy has been developed based on best practice taking into account consideration of Dunedin's specific context in terms of overall water resource availability, consent requirements, operational constraints and patterns of community water use.

POLICY

1. Imposing and lifting temporary water restrictions

1.1. Temporary water restrictions may be required in the following circumstances:

- Prolonged dry weather conditions
- Exceptional peaks in water demand that cannot be met without breaching resource consent levels and/or exceeding supply capacity
- Operational emergency (e.g., critical infrastructure failure).

1.2. The Council routinely monitors parameters relating to the water supply and demand balance. Key parameters have been defined and are used to determine the need for the use of temporary water restrictions. These parameters include:

- Raw water catchment yield

- Raw water storage levels
- Treated water storage levels
- FENZ fire risk rating
- Actual rainfall (monthly rolling average)
- Forecast rainfall (Metservice and ESNZ)
- Otago Regional Council irrigation restrictions
- Consent compliance (residual flow conditions).

1.3. The triggering of the use of temporary water restrictions, and the level of restriction to be used, will depend on the Multi-Criteria Decision Making Matrix, which consists of the parameters listed above.

1.4. In making decision on the use of temporary water restrictions, the Council will also consider wider factors including daily consumption/demand levels in the immediate preceding period; soil moisture content, failure of key facilities; the desirability of reducing water usage on an ongoing basis; the desirability of avoiding excessive reliance on only one water catchment and the possibility that if restrictions do not sufficiently reduce current water consumption, water available for later supply may be of a quality that is too difficult to treat, leading to a reduced amount of treated water available to be supplied to the community.

1.5. Temporary water restrictions shall remain in force for as long as necessary to allow supply and demand patterns to return to normal operating levels and shall only be lifted once the operating parameters return to below the trigger levels in the Multi-Criteria Decision Making Matrix.

1.6. The Head of 3 Waters will have delegated authority to implement or remove Level 1, 2 and 3 water restrictions. Level 4 water restrictions will require the General Manager's approval.

2. Levels of Restriction

2.1. The levels of restriction start with Voluntary/Summertime water restrictions and follow with Levels 1, 2, 3 and 4, which introduce increasingly stringent restrictions. Appendix 1 provides the details of the different levels of restriction, the targeted water use activities and the expected reduction in demand.

3. Implementation

3.1. Temporary water restrictions will be publicly notified via newspapers and other suitable media.

3.2. The Council will monitor public adherence to temporary water restrictions during the period they are in effect. Failure to comply with temporary water restrictions is a breach of the Water Supply Bylaw 2026 and may be subject to enforcement action under the Bylaw.

4. Exemptions

4.1. Full or partial exemptions to temporary water restrictions may be granted, without limiting the grounds on which it might be granted, based on compelling reasons only. Reasons include health or public hygiene or where compliance with temporary restrictions would be likely to

cause disproportionate or unintended financial damage to the party. The exemptions or the partial exemptions will only be granted by Council in writing.

4.2. The Head of 3 Waters will have the delegated authority to grant the exemptions to restrictions at levels 1, 2 and 3. During extreme situations, where Level 4 temporary water restrictions are in force, the General Manager will determine any exemptions.

Relevant Legislation:	Local Government (Water Services) Act 2025 Water Services Act 2021
Associated Documents:	Water Supply Bylaw 2026

APPENDIX 1: TEMPORARY WATER RESTRICTION LEVELS

Level number		**Voluntary/summertime water restrictions**	**Level 1- low level of water restriction**	**Level 2 – medium level of water restriction**	**Level 3 – high level of water restriction**	**Level 4 – extreme level of water restriction**
Level description		**In place from 1 December to 30 April[1]**	**Timed usage to avoid peak demand (some residential outdoor water use permitted only between 8pm to 6am)**	**Sprinklers are not permitted, timed usage to avoid peak demand, and some residential outdoor water use restricted to alternate days[2]**	**All residential outdoor water use not permitted, apart from handheld watering of vegetable gardens**	**Essential[3] indoor water use only during critical water shortage or emergency situations[4]**
Target Demand Reduction		**0-10%**	**10%**	**20%**	**30%**	**+30%**
Restrictions on Water Use for Residential Users						
General outdoor watering of private gardens and lawns	Use of sprinklers/irrigation systems	Recommend using sprinklers sparingly	Permitted only between 8pm to 6am	Not Permitted	Not Permitted	Not Permitted
	Use of handheld hose/watering can	Recommend using handheld hose/watering can when needed	Permitted only between 8pm to 6am	Permitted only between 8pm to 6am on alternate days	Not Permitted	Not Permitted
	Watering of vegetable gardens via handheld hose/watering can	Recommend watering vegetable gardens as needed	Recommend watering vegetable gardens as needed	Recommend watering vegetable gardens as needed	Permitted only between 8pm to 6am	Not Permitted
All other outdoor water use including but not limited to the filling of swimming pools, spas, paddling pools, washing cars, use of water toys (slip and slides and toys attached to hoses) cleaning the exterior surfaces of homes etc.	Applies to any form of water use that occurs outside private homes	Recommend sensible water use for these activities	Recommend sensible water use for these activities	Permitted between 8pm to 6am on alternate days	Not Permitted	Not Permitted
Restrictions on Water Use for Non-Residential Users						
Non-Residential Water Use	Outdoor water use	Recommend that non-residential water users use water sensibly and are to be pragmatic and responsible with their outdoor water use		Non-residential water users are encouraged to minimise water use or where possible reschedule outdoor water use until the restrictions have been lifted		Restrictions will be determined at the time
Dunedin City Council's Approach to Reduce Water Use						
Washing/cleaning of Council managed properties		Sensible water use	Only when necessary	Only when necessary and only using a bucket	None unless for regulatory, health and safety, maintenance or emergency purposes	No water use
Washing/cleaning of Council managed fleet vehicles		Sensible water use	Only when necessary, using a handheld hose or bucket	Only when necessary, using a handheld hose or bucket	None unless for regulatory, health and safety, maintenance, or emergency purposes	No water use
Operation of Council managed water features, ponds, fountains etc.		Sensible water use	Botanic Garden Water Fountains to be drained Botanic Garden duck and fishpond to remain filled.	Botanic Garden Water Fountains to be drained Botanic Garden duck and fishpond to remain filled.	Botanic Garden Water Fountains to be drained Botanic Garden duck Pond to remain filled.	No water use

[1] Or during any other time that the DCC chooses.
[2] Alternate days means that residents whose street address number is even can use water on days with even dates, and odd numbered addresses can use water on days with odd dates.
[3] Essential indoor water use refers to water used for drinking, food preparation, and personal hygiene.
[4] The DCC may restrict other water use activities at this level if required to reduce demand. Water restrictions imposed at this level may impact residential and/or non-residential water users.

APPENDIX 1: TEMPORARY WATER RESTRICTION LEVELS

Level number	Voluntary/summertime water restrictions	Level 1- low level of water restriction	Level 2 – medium level of water restriction	Level 3 – high level of water restriction	Level 4 – extreme level of water restriction
		Water topped up between 8pm-6am Other water features to be emptied	Water topped up between 8pm-6am Other water features to be emptied	Water topped up between 8pm-6am Botanic Garden fishpond to be drained and fish moved to smaller tanks in Propagation Other water features to be emptied	
Watering of Council Managed gardens and nurseries	Sensible water use	Use of sprinklers between 8pm-6am Hand watering collections/beds that cannot be accessed by sprinkler systems between the hours of 8pm-10am No watering of lawn areas	Hand watering high priority collections/beds between the hours of 8am -10am on alternate days No watering of lawn areas	Hand watering high priority collections/beds between the hours of 8am-10am on alternate days No watering of lawn areas	No water use
Operation of Council managed pool facilities	Continue normal operations	Continue normal operations	Reduced/restricted use of high-water activities – deck washing, hydro slides, inflatables etc	Reduced or rescheduled filling of public pools to occur between 8pm and 6am Suspend high-water use activities – e.g. inflatables and wave machine	No filling or backwashing of public pools unless for regulatory, health and safety, maintenance or emergency purposes
Watering of Council managed parks, sports fields, green spaces etc.	All priority level greenspaces watered as usual	High and Medium Priority greenspaces watered as usual Low Priority greenspaces reduced by 50%	High Priority greenspaces watered as usual Medium Priority greenspaces reduced by 50% Low Priority greenspaces reduced by 100%	High Priority greenspaces reduced by 50% Medium and Low Priority greenspaces reduced by 100%	No water use

General water saving tips:

- Outdoors
  - Give your garden a deep soak every few days. This encourages deeper roots and reduces water loss from evaporation. Adjust your lawn mower to cut 40-50mm. Taller grass holds soil moisture better.
  - Add mulch to your garden around your plants, you can even use lawn clippings as mulch to retain soil moisture and reduce weeds.
  - In dry weather, check your garden every 4-7 days, if your soil is moist 10cm below the surface don't worry about watering.
  - Check your hose and sprinkler for leaks.
  - Use a timer on your sprinkler, watering only when the sun has gone down to avoid evaporation.
  - Use a trigger nozzle on your hose.
  - Wash your car/boat on a grass surface or use a car washing facility.

APPENDIX 1: TEMPORARY WATER RESTRICTION LEVELS

  - Cover pools and spas to prevent water evaporation.
  - Use a broom instead of water to clean hard surfaces such as foot paths and driveways.

- Indoors
  - Have a shorter shower or cut down on the amount of water for your bath. Each minute in the shower uses about 14 litres of water and filling a bathtub takes about 300 litres.
  - Turn off your tap when you are brushing your teeth or shaving.
  - Set your washing machine to the proper load size or hold off on putting the machine on until a full load has accumulated.
  - Keep an eye on your taps for leaks. A dripping tap uses 100 litres a day.
  - Check your toilet for leaks, a continuously running toilet can waste more than 700 litres of water a day.
  - Use a small bowl rather than a full sink or running water to wash vegetables. You can then put the bowl of wash water on the garden afterwards.
  - Defrost food in the fridge rather than using running water.
  - Recycle old water from pet bowls, kettles, etc. to water plants.
  - Hold off putting the dishwasher on until it has a full load. Use the dishwasher in preference to handwashing – dishwashers use less water than handwashing.
  - Keep a bottle or jug of cool water in the fridge rather than running the tap and waiting for it to cool.

- Planning for the future
  - Choose plants that don't need too much water.
  - Position plants with similar watering needs together (called hydro-zoning), this enables you to water them more effectively.
  - Look for the 6-star Water Conservation rating if you are buying new appliances.
  - Consider installing aerated tap mixers and a water-saving shower head.
  - Consider installing a dual-flush toilet cistern or place a weight in the cistern to reduce capacity.

ATTACHMENT 1

POLICY ON TEMPORARY WATER RESTRICTIONS

1.0 INTRODUCTION: POLICY CONTEXT AND PURPOSE

The purpose of the water restriction policy is to allow for effective and efficient management of short term issues with the supply and demand balance of reticulated water supplies. This is in line with the following clauses of the Water By-Law 2008:

- Clause 7.6.3 refers to Demand Management and states that, *"The Customer shall comply with any restrictions which may be approved by the Council to manage high seasonal or other demands (which may also be related to Otago Regional Council resource consent compliance requirements or any variation to a resource consent). Such restrictions will be publicly notified.*

  Even when such restrictions apply the Council will take all practicable steps to ensure that an adequate supply for domestic purposes is provided to each Point of Supply."

- Clause 7.6.4 refers to Emergency Restriction and states that, "*During an emergency the Council may restrict or prohibit the use of water for any specified purpose, for any specified period, and for any or all of its customers. Such restrictions shall be publicly notified. The Council may enact penalties over and above those contained in these conditions to enforce these restrictions. The decision to make and lift restrictions and to enact additional penalties shall be made by the Council, or where immediate action is required, by the Manager of the WWSBU, subject to Council ratification."*

The Council has ongoing programmes to ensure that the strategic balance between water resource availability and community water requirements is maintained. However, there may be occasions when, either through exceptional weather events or operational emergencies, it is necessary to impose water use restrictions to ensure that the community's essential water needs can still be met.

This policy has been developed based on the best Australasian practice taking into consideration Dunedin's specific context in terms of overall water resource availability, consent requirements, operational constraints and patterns of community water use.

2.0 IMPOSING AND LIFTING RESTRICTION

Water restrictions may be required under the following circumstances:

- Prolonged drought condition
- Exceptional peaks in water demand that cannot be met without breaching resource consent levels and/or exceeding supply capacity)
- Operational emergency (eg unplanned water treatment plant shutdown, and other treatment plants unable to provide sufficient supply)

The Water and Waste Services Business Unit routinely monitors a number of parameters relating to the water supply and demand balance. A number of key parameters have been defined, which are used to determine the enforcement of water restrictions. These parameters include:

- river water levels;
- raw water storage levels;
- the time of the year and likely future consumption of water;
- daily consumption/demand levels in the immediately preceding period;
- currently available weather forecasts and other meteorological advice;
- resource consent on water intake levels;
- actions by other relevant organisations, eg National Fire Authority fire risk, ORC irrigation restrictions;
- failure of key facilities
- the desirability of reducing water usage on an ongoing basis;
- the desirability of avoiding excessive reliance on only one water catchment;

- the possibility that if restrictions do not sufficiently reduce current water consumption, water available for later supply may be of a quality that may cause damage to property.

The trigger levels for the respective levels will depend on the Multi-Criteria Decision Making Matrix, which consists of the parameters stated above.

The restriction shall remain in force for as long as is necessary to allow supply and demand patterns to return to normal operating levels and shall only be lifted once the operating parameters return to below the trigger levels.

In accordance to the level of restrictions presented in the proceeding section, the Water and Waste Services Manager will have the delegated authority to implement or remove level 1, 2 and 3 water restrictions. Level 4 water restrictions will require the General Manager's approval.

3.0 LEVELS OF RESTRICTION

The restrictions consist of Level 1, 2, 3 and 4, which bring in increasingly stringent restrictions. Appendix 1 provides the details of the restrictions, the targeted activities and the expected reduction.

Prior to enforcing the restrictions, a precautionary approach will be undertaken. This approach is to pre-empt the consumers of possible forthcoming restrictions and urge them to be prudent in their water use. This is to be achieved via media notification and other appropriate methods.

There may be extreme situations where more rigorous measure are required, including but not limited to rationing or pressure management. In these situations, a water event management plan would be drafted for EMT's approval.

4.0 ENFORCEMENT

The restriction will be publicly notified via newspapers and other suitable media.

During the period of the restriction, adherence of the public to the restriction will be checked. Failure to comply to the restriction is deemed a breach of the Terms and Conditions to supply as stated in Clause 8.1(e)(v). Appropriate action will be taken against any person caught violating the restriction, which is allowed for under Clauses 8.4 and 8.5 of the Water By-Law 2008:

- Clause 8.4 refers to entitlement of the Council and states that, *"The Council is entitled to take any steps it is legally authorised to take to enforce breaches of the Bylaw and/or the Act.*

- Clause 8.5 refers to the consequence of offences, which states, "*Every person who:*
  a) Fails to comply with or acts in contravention of any provision of this Bylaw; or
  b) Breaches the conditions of supply granted pursuant to this Bylaw; or
  c) Fails to comply with a notice served under this Bylaw,

  commits an offence under section 239 of the Act and is liable to be prosecuted in the District Court under section 244 of the Act and is liable to a fine as specified in section 242 of the Act, or is liable to the issue of an infringement notice under section 245 of the Act.

5.0 EXEMPTIONS

Full or partial exemptions may be granted, without limiting the grounds on which it might be granted, based on compelling reasons only. The reasons include health or public hygiene or where compliance with temporary restrictions would be likely to cause disproportionate or unintended financial damage to the party. The exemptions or the partial exemptions will only be granted in writing by the Council.

The Water and Waste Services Manager will have the delegated authority to grant the exemptions for the period of Restriction Level 1, 2 and 3. During the extreme situations, where level 4 water restriction is to be enforced, EMT/GM will determine any exemptions.

APPENDIX 1: WATER RESTRICTION LEVELS

The Table provides details of the water restriction stages

	Level 1	Level 2	Level 3
Target Annual Reduction (% of Average Daily Consumption)	**10%**	**17%**	**20%**
Type of Usage	Restrictions on Use	Restrictions on Use	Restrictions on Use
1. Watering of private gardens and lawns	No sprinkler or other irrigation system between 8.00am and 8.00pm. Hand-held hosing only at any time.	No hand-held hosing, sprinkler or other irrigation system allowed between 8.00am and 8.00pm.	Watering of outside lawns and plants only permitted using buckets/watering cans.
2. Watering of lawns and plants at parks, sports amenities, golf courses and public gardens	No sprinklers between 8.00am and 8.00pm. Hand-held hose fitted with a trigger nozzle may be used to water lawns and plants at any time.	No sprinkler or other irrigation system between 8.00am and 8.00pm. Hand-held hosing at any time.	No sprinkler or other irrigation system. Hand-held hosing only at any time.
3. Watering of commercial nurseries/garden	No sprinkler between 8.00am and 8.00pm. Hand-held hose fitted with a trigger nozzle may be used to water lawns and plants at any time.	No sprinkler or other irrigation system between 8.00am and 8.00pm. Hand-held hosing at any time.	No sprinkler or other irrigation system. Hand-held hosing only at any time.
4. Filling of private ponds and fountains	Fountains must be switched off. Ponds may only be topped up using a hand-held hose fitted with a trigger nozzle or by bucket between 8.00pm and 8.00am.	Fountains must be switched off. Only ponds that support fish may be topped up and then only using a hand- held hose fitted with a trigger nozzle or by bucket between 8.00pm and 8.00am.	Fountains must be switched off. Only ponds that support fish may be topped up, and then only using a bucket between 8.00pm and 8.00am.
5. Public ponds and fountains	Only fountains that recirculate water may be operated. Ponds may only be topped up using a hand-held hose fitted with a trigger nozzle or by bucket between 8.00pm and 8.00am.	Only fountains that recirculate water may be operated. Ponds may only be topped up using a hand-held hose fitted with a trigger nozzle or by bucket between 8.00pm and 8.00am.	No fountains may be operated, filled or topped up with water at any time. Only ponds that support fish may be topped up using a bucket only between 8.00pm and 8.00am.
6. Private swimming pools	Topping up or filling is undertaken with a hand-held hose only between 8.00pm and 8.00am.	Topping up or filling is undertaken with a hand-held hose only between 8.00pm and 8.00am.	No filling or top-up at any time.
7. Public/commercial swimming pools (eg Moana Pool)	No restrictions.	No restrictions	Topping up only between 8.00pm and 8.00am.
9. Vehicles	If not washed at a commercial car wash, any vehicle should be washed on a lawn or other porous surface wherever practicable only be between 8.00pm and 8.00am.	If not washed at a commercial car wash, any vehicle should be washed on a lawn or other porous surface wherever practicable only between 8.00pm and 8.00am.	Bucket cleaning only.
10. Water blasting/washing of assets, eg windows, roof, boats	No washing between 8.00am and 8.00pm unless necessary as a result of major activities that cannot be done during winter (eg roof painting), accident, fire, health hazard or other emergency. Building gutters may be cleaned at any time.	No washing between 8.00am and 8.00pm unless necessary as a result of major activities that cannot be done during winter (eg roof painting), accident, fire, health hazard or other emergency. Building gutters may be cleaned at any time.	Bucket cleaning only unless necessary as a result of accident, fire, health hazard or other emergency. Building gutters may be cleaned at any time.

Notes:

1. Any other water uses that are not indicated in the policy or do not fall under similar categories are allowed during the restrictions unless instructed by Dunedin City Council through the Water and Waster Services Business Unit.

2. "Private" means domestic properties only.
3. "Public" means Government places and private places operated for public use.
4. "Sprinkler" and "Irrigation System" means a device or system designed to distribute water, whether by sprinkling, spraying, dripping, weeping or otherwise.
5. "Trigger nozzle'" means a nozzle, attached to a hand-held hose, which is controlled by (a) a trigger which must be depressed continuously or locked open by hand to allow water to flow; or (b) a discrete switch or button which can be turned on or off by hand with a single or limited movement.
6. Times specified may be changed depending on the seasonal change.

Policy on Temporary Water Restrictions – Feedback Results from Comments Wall

Title	Topics	Comment	Likes	Comments	Asset id	Parent asset
Notifying the public of level changes	**Voluntary (new inclusion)**	4.0 ENFORCEMENT The restriction will be publicly notified via newspapers and other suitable media. Let's be sure that notifications are locally notified - not everyone reads the newspapers or is on Facebook.	0	0	1316621	1312631
Restrict their water use during tourism peak	**Voluntary (new inclusion)**	I also find it frustrating when residents are asked to restrict their water use while large numbers of visitors are in the city during peak summer periods (cruise ships). If water demand is expected to keep increasing, I would like to see Council focus on long-term solutions such as rainwater harvesting, storage and demand management, rather than relying primarily on restrictions for households.	2	0	1315795	1312631

Support sensible water restrictions	**Voluntary (new inclusion)**	I support sensible water restrictions during shortages, but in the long term I'd like to see more focus on reducing reliance on treated drinking water for outdoor uses. I think Council could consider exploring requiring rainwater collection systems in new builds and making it easier for existing homeowners to retrofit them. I'd happily use stored rainwater for watering gardens, washing the car and other outdoor uses, which would reduce demand on the public supply during dry periods. Such systems would ease flooding in flood prone areas such as Mosgiel and South D.	5	0	1315793	1312631
Water Hours Shift Approved	**Time changes from 8pm – 6am**	Hi I think the shifting of hours of use to earlier would be great	2	0	1315797	1312631
Watering food producing plants	**New vegetable garden management**	I would be heartbroken to see my fruit bushes/trees die when I can only water vegetables. Food producing plants would be a better inclusion. A fruit bush/tree usually embodies years of growing and nurturing.	0	0	1316722	1312631
water restriction	**New vegetable garden management**	'we' have a large organic veggie garden.. we are on the pension,... any extra from our garden is given to a few needy families near us... we don't use many of the community services, but are happy to be chipping in for others.. would hate to think that Business (Capitalists) gets get grained gains over us others.. we practice saving water pretty	1	0	1316660	1312631

		seriously, that 8am to 8pm makes sense! as we can get up and water, 6am would make that almost impossible.. to be honest! I would just brake that 'rule'...				
Will exemptions be publicised?	**Simplification of non-residential uses**	Will the list of companies granted exemptions be publicly available? Transparency is vital for fair allocation of our water resources.	1	0	1316623	1312631

SUBMISSION ON PROPOSED WASTEWATER ENVIRONMENTAL PERFORMANCE STANDARDS

Department: 3 Waters

EXECUTIVE SUMMARY

1 This report seeks the Council's approval of a draft Dunedin City Council (DCC) submission (Attachment A) to Water Services Authority-Taumata Arowai (Taumata Arowai) on proposed wastewater environmental performance standards (tranche two).

2 The proposals are set out in 'Consultation on tranche two of the wastewater environmental performance standards: Discussion document', published 10 September 2026 (discussion document). The discussion document is attached to this report as Attachment B. The discussion document and technical reports are available online at: https://www.taumataarowai.govt.nz/wastewater-sector/wastewater-standards/wastewater-standards-tranche-2

3 The deadline for submissions on the discussion document is 5pm, 22 October 2026.

RECOMMENDATIONS

That the Committee:

a) **Approves** the draft DCC submission to Taumata Arowai on proposed wastewater environmental performance standards at Attachment A.

b) **Authorises** the Mayor and/or her delegate to speak to the submission.

c) **Authorises** the Chief Executive to make any minor editorial changes if needed.

BACKGROUND

4 A first tranche of four wastewater environmental performance standards came into effect in December 2025. These standards covered discharges to water, discharges to land, beneficial reuse of biosolids, and discharges from wastewater network overflows and wastewater treatment plant bypasses. The DCC made a submission on the proposed standards during engagement in April 2025. The four 'tranche one' standards were amended in August 2026 to address technical errors, drafting issues, ambiguities and operational problems.

5 On 10 September 2026, Taumata Arowai published the discussion document (Attachment B) and opened consultation on proposals to introduce a second tranche of wastewater environmental performance standards, comprising proposed standards for discharges to air and proposed standards for the discharge of metals to water. The discussion document outlines

matters the proposed standards would cover and how they would be implemented but does not provide specific detail of the potential standards.

6 Wastewater environmental performance standards are implemented through resource consents for wastewater treatment plants. Where a wastewater environmental performance standard applies, consenting authorities need to set consent conditions that are consistent with the requirements of that standard.

7 The discussion document outlines proposals for two wastewater environmental performance standards:

- The proposed wastewater standard for discharge to air would set nationally consistent requirements for managing odour, scaled to the risk profile of each wastewater treatment plant. Lower-risk plants would have basic planning, complaints, and reporting requirements; while higher-risk plants would be required to carry out a more detailed assessment, review, and improvement planning.

- The proposed wastewater standard for the discharge of metals in treated wastewater to a water receiving environment (discharge of metals to water) would use a nationally consistent, risk-based approach to decide what monitoring or controls are needed. Lower-risk plants would generally rely on related measures and information monitoring, while stronger controls, including numerical limits, would be targeted to higher-risk discharges and more sensitive receiving environments.

8 Together, the proposals aim to complement existing wastewater standards to reduce duplication and uncertainty in consenting, improve transparency, and make requirements clearer and more proportionate for councils, wastewater operators, and communities.

9 In line with the first tranche of wastewater standards, the proposals in the discussion document are focused on publicly owned and operated wastewater treatment plants. The standards do not apply to privately owned networks, septic tanks, or onsite wastewater systems. This includes onsite systems with primary, secondary or disinfection treatment, such as systems serving campground ablution blocks or public toilets.

Existing DCC WWTP discharge consents

10 The table below shows the status of each DCC WWTP (plus the Musselburgh wastewater pumping station) with respect to any air discharge consents held and with respect to inclusion of controls on metals in the wastewater discharge consent:

Wastewater treatment plant	Current air discharge consent status	Status of wastewater discharge consent in terms of metals
Tahuna WWTP	Consent number: RM12.139.01.V2 Consent in place – deals with odour, and combustion emissions from biosolids incinerator and diesel generator Consent expiry date: 2032	Consent number: 2002.623 Includes requirements to monitor total metals in the discharge and includes discharge quality limits for total metals Consent expiry date: 2032

Wastewater treatment plant	Current air discharge consent status	Status of wastewater discharge consent in terms of metals
Green Island WWTP	Consent number: 97528.V1 Consent in place – deals with odour Consent expiry date: 2032	Consent number: 97528.V1 Includes requirements to monitor total metals in the discharge and includes discharge quality limits for total metals Consent expiry date: 2032
Mosgiel WWTP	No consent in place – however, DCC is currently applying for a consent for combustion emissions from a proposed biogas flare	No discharge consent held – treated wastewater from Mosgiel WWTP receives further treatment at Green Island WWTP prior to discharge (under the Green Island WWTP discharge consent).
Waikouaiti WWTP	Consent number: RM12.190.01 Consent in place – deals with odour Consent expiry date: 2028	Consent number: RM12.190.02 No requirement to monitor metals in the discharge. Consent expiry date: 2028
Warrington WWTP	Consent number: 2007.014 Consent in place – deals with odour Consent expiry date: 2027	Consent number: 2006.861.V2 No requirement to monitor metals in the discharge. Consent expiry date: 2027
Seacliff WWTP	No consent in place	Consent number: RM19.210. 02 No requirement to monitor metals in the discharge. Consent expiry date: 2041
Middlemarch WWTP	No consent in place	Consent number: RM21.037.01 No requirement to monitor metals in the discharge. Consent expiry date: 2029

Wastewater treatment plant	Current air discharge consent status	Status of wastewater discharge consent in terms of metals
Musselburgh WW pumping station	Consent number: 2006.825 Consent in place – deals with odour, and combustion emissions from diesel generator Consent expiry date: 2032	N/A

DISCUSSION

11 ***Key implications of proposed standards for DCC WWTP discharges and consents***Tranche 2 of the wastewater environmental performance standards is directly relevant to applications for any new consents for DCC WWTPs to replace expiring consents. Once the proposed standards come into effect, they would introduce further requirements relating to air discharges / odour and metals in treated wastewater discharged into water, both of which may have implications for future monitoring, compliance, assessment and reconsenting.

12 Key implications of the proposed standard for discharge to air being introduced would be that DCC would:

- Likely need to apply for air discharge (odour) consents for the Mosgiel, Seacliff and Middlemarch WWTPs.
- Assess against the wastewater environmental performance standards when applying for new consents to replace expiring consents for discharges to air the from Waikouaiti, Warrington, Green Island and Tahuna WWTPs.

13 The proposed standard for discharges of metals to water imposes discharge quality limits on dissolved metals, while the discharge quality limits for metals in the Tahuna and Green Island WWTP discharge consents are for total metals. As a result, it is not possible to make a direct comparison between the proposed limits in the standards and the existing limits in the consents. The standards for discharge of metal to water would apply when the DCC applies for new consents to replace expiring wastewater discharge consents for the Tahuna and Green Island WWTPs.

14 Other DCC wastewater treatment plant discharge consents do not include requirements to monitor metals in the discharge, and do not include discharge quality limits for metals. Therefore, the implication of the metals standard for DCC might be that future discharge consents for the Warrington, Waikouaiti, Middlemarch and Seacliff WWTPs may include monitoring requirements and possibly compliance limits for metals, depending on the risk profile of each plant and its receiving environment.

Summary of key points of draft DCC submission

15 The draft DCC submission expresses support for the proposal to introduce standards for regulating discharges to air and discharge of metals to water from public wastewater systems in

principle. However, the draft submission states the current proposals outlined in the discussion document require refinement before they are given effect.

16 The draft DCC submission makes specific recommendations that Taumata Arowai:

a) consults the public on draft wastewater environmental performance standards before draft standards are provided to Ministers for approval;

b) carefully considers how consenting discharges of odour to air will work in conjunction with consenting other discharges to air and makes appropriate improvements to the proposals;

c) clarifies how complaint-based triggers in the proposed discharge to air (odour) standard would work in practice;

d) provides a rationale for the focus on dissolved metals (as opposed to total metals); and

e) considers incorporating an effects-based approach into the proposed standard for metals so that consenting decision can take naturally occurring metal levels into consideration along with the type of receiving environment and discharge risk.

OPTIONS

Option One – Submit on proposed wastewater environmental performance standards (Recommended Option)

17 Approve, with any suggested amendments, the draft submission to Taumata Arowai on proposed wastewater environmental performance standards (Attachment A).

Advantages

- Opportunity to provide feedback on and shape the subsequent development of wastewater environmental performance standards.

Disadvantages

- There are no identified disadvantages for this option.

Option Two – Do not submit on proposed wastewater environmental performance standards

18 Do not approve the draft DCC submission (Attachment A).

Advantages

- There are no identified advantages for this option.

Disadvantages

- Missed opportunity to provide feedback on and shape the subsequent development of wastewater environmental performance standards.

NEXT STEPS

19 If approved, the draft DCC submission will be sent to Taumata Arowai by 22 October 2026.

Signatories

Author:	Jacinda Baker - Senior Policy Analyst
Authoriser:	Scott Campbell - Regulation and Policy Team Leader Jared Oliver - Planning Manager John McAndrew - Head of 3 Waters

Attachments

	Title	Page
⇩A	Draft submission	53
⇩B	Discussion document	61

SUMMARY OF CONSIDERATIONS

Fit with purpose of Local Government

This decision promotes the environmental well-being of communities in the present and for the future.

Fit with strategic framework

	Contributes	Detracts	Not applicable
Social Wellbeing Strategy	☐	☐	✓
Economic Development Strategy	☐	☐	✓
Environment Strategy	✓	☐	☐
Arts and Culture Strategy	☐	☐	✓
3 Waters Strategy	✓	☐	☐
Future Development Strategy	✓	☐	✓
Integrated Transport Strategy	☐	☐	✓
Parks and Recreation Strategy	☐	☐	✓
Other strategic projects/policies/plans	✓	☐	☐

This report has been prepared with reference to Dunedin's strategic framework.

Māori Impact Statement

Appropriate management of the effects of discharges from wastewater treatment activities is of high importance Mana Whenua. The draft DCC submission recommends that Taumata Arowai conducts additional consultation on draft wastewater environmental performance standards before draft standards are provided to the Minister for approval. This recommendation to undertake further consultation supports the ability of Mana Whenua to scrutinise the proposed standards and participate in their development.

Sustainability

The draft DCC submission recommends revisions to the proposed wastewater environmental performance standards intended to support environmental sustainability.

LTP/Annual Plan / Financial Strategy /Infrastructure Strategy

This report and the decision to approve a draft DCC submission have no direct implications for these plans and strategies.

Financial considerations

There are no financial implications directly associated with this report and the decision to approve a draft DCC submission.

Significance

The decision to approve a draft DCC submission is considered low in terms of the Council's Significance and Engagement Policy.

Engagement – external

No external engagement is required.

Engagement - internal

Staff from across the 3 Waters Group were involved in the development of the draft DCC submission.

SUMMARY OF CONSIDERATIONS
Risks: Legal / Health and Safety etc. There are no identified risks directly related to a DCC submission on proposed wastewater environmental performance standards.
Conflict of Interest There is no known conflict of interest.
Community Boards Community Boards are likely to be interested in the DCC submission on proposed wastewater environmental performance standards.

DUNEDIN CITY COUNCIL | kaunihera a-rohe o Ōtepoti

22 October 2026

Taumata Arowai – Water Services Authority
Level 2, 10 Brandon Street
PO Box 628
Wellington 6140
via email to: stormwater_wastewater@taumataarowai.govt.nz

Kia ora,

DCC SUBMISSION ON PROPOSED WASTEWATER ENVIRONMENTAL PERFORMANCE STANDARDS TRANCHE TWO

Introduction

1 The Dunedin City Council (DCC) thanks the Water Services Authority-Taumata Arowai for the opportunity to make a submission on proposed wastewater environmental performance standards.

2 This submission begins with background information on the DCC wastewater network to provide context for the DCC's submission points. It then goes on to provide feedback on the proposals set out in the document 'Consultation on tranche two of the wastewater environmental performance standards: Discussion document', published 10 September 2026 (discussion document).

3 In summary, the DCC supports the proposal to introduce standards for regulating discharges to air and discharge of metals to water from public wastewater systems ***in principle***. However, the DCC considers the current proposals outlined in the discussion document require refinement before they are given effect. The DCC feedback and recommendations are intended to be constructive and to assist Taumata Arowai as the development of draft standards progresses.

Context: DCC wastewater network

4 The DCC provides wastewater collection, treatment and disposal services to connected properties across urban Dunedin.

5 The DCC operates seven wastewater treatment plants (WWTP): three 'metropolitan' WWTPs at Tahuna, Green Island and Mosgiel, and four 'community' WWTPs servicing smaller populations at Middlemarch, Waikouaiti/Karitāne, Seacliff and Warrington.

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6 The DCC holds multiple resource consents that authorise WWTP activities, including permits for discharges to the coast, land (including discharges to land in a manner that may enter water) and air. The majority of these consents expire in 2032, however some expire sooner or later than this date. The consents include a range of conditions, including conditions related to discharge quantity and quality limits, and monitoring and reporting requirements.

7 Compliance with wastewater discharge consents is regularly audited by the Otago Regional Council (ORC).

8 Drawing on its experience as a wastewater network operator, the DCC has actively participated in the development of national and regional planning and policy instruments that contribute to managing the environmental effects of discharges from public wastewater systems. These include the National Policy Statement for Freshwater Management 2020, the Otago Regional Policy Statement 2021, changes to the Regional Plan: Water for Otago, and tranche one of the wastewater environmental performance standards. The DCC has advocated for policy approaches that appropriately balance environmental, mana whenua and other community values with affordability considerations and a holistic, system-wide approach to three waters infrastructure planning.

9 The DCC has recently completed a holistic, system-wide strategic planning exercise to inform future investments in its three waters network. An overarching purpose of the exercise was to ensure that the investments in three waters network are properly prioritised to achieve optimal outcomes (including environmental outcomes and giving effect to mana whenua values) from a system-wide point of view.

10 The holistic, system-wide approach recognises the interconnected nature of three waters network and seeks to avoid investment decisions being made on a narrow, case-by-case basis. For example, it seeks to avoid investment decisions being driven solely by regulatory factors such as consent expiry, or by a narrow focus on one part of the system.

11 The DCC's three waters strategic planning work was undertaken in partnership with mana whenua and was underpinned by objectives that relate to a range of drivers, including levels of service, Te Mana o te Wai, cultural values, affordability, regulatory compliance and responding to impacts of climate change and population growth. The exercise incorporated an adaptive planning approach designed to provide flexibility in the DCC's plans to adjust to changes in the operating environment (including, for example, regulatory and policy changes, changes in community expectations, and climate change).

DCC submission points

12 The DCC understands that the next step following the current consultation is for Taumata Arowai to prepare draft wastewater environmental performance standards and present them to Ministers for approval.

13 The DCC is concerned that there does not appear to be any plan for further public consultation on the proposals once they are at a more detailed stage of development. The DCC considers further public consultation prior to Ministerial review and approval is warranted by the scale and potential significance of the proposals.

14 The DCC notes that the four 'tranche one' standards were amended in August 2026 to address technical errors, drafting issues, ambiguities and operational problems. The DCC suggests that consultation on draft standards could reduce the likelihood of amendments being required for the tranche two standards after they come into effect. Taking the time for appropriate consultation during the drafting phase provides an opportunity for potential issues to be addressed prior to Ministerial approval.

15 The tranche one wastewater environmental performance standards have established the framework for the tranche two standards to sit within. The DCC remains concerned about the implementation of the standards if the details are not refined through appropriate public consultation, as there could be potential compromise of environmental outcomes and/or lead to outcomes inconsistent with cultural values and other values. The tranche one standards are still relatively new and untested.

16 Council considers a rigorous process should be followed to make the standards, to reduce the potential for standards to cause adverse effects once implemented.

17 The DCC **recommends** Taumata Arowai consults the public on draft wastewater environmental performance standards before draft standards are provided to Ministers for approval.

Discharge to air/odour

Potential requirement for multiple consents

18 It is yet not fully clear to the DCC how consenting discharge to air from WWTPs would work in practice under the proposed regime. For example, the discussion document indicates that the proposed standard for discharges to air is only for odour and that other discharges to air are managed through other processes.

19 Current discharge consents for several of DCC's larger WWTPs, for example, manage discharge to air for odour and combustion emissions from biosolids incinerator, diesel generator, or biogas flare.

20 It appears that if odour will be addressed via separate consents that would mean that the water service provider could be required to seek two consents for the same discharge activity in parallel.

21 If this is the case, the DCC considers that the approach is unlikely to achieve the intended efficiency and cost-saving benefits for water service providers and communities at the consenting stage.

22 The DCC **recommends** that Taumata Arowai carefully considers how consenting discharges for odour will work in conjunction with other discharges to air and other WWTP consents and makes appropriate improvements to the proposals to address the issues raised.

Proposed management-based framework

Contributes to answering **Question 2:** Do you agree with using the proposed management-based framework for odour?

23 Overall, the proposed management-based framework for odour seems sensible and is reasonably consistent with the approach in current consents – e.g. approach of lower-risk plants having basic planning, complaints, and reporting requirements; while higher-risk plants have more detailed requirements. Improvement planning for high-risk plants is a reasonable requirement.

Risk classification threshold

Contributes to answering **Question 3:** Do you agree with the proposed odour risk categories, thresholds, and definitions?

24 The consultation document (Table 1, page 11) sets out the proposed trigger for the medium risk classification category as being any WWTP that does not fit in any of the other categories listed. This approach may make it difficult or frustrating for water service providers to determine which category applies to their WWTP.

25 The DCC **recommends** that Taumata Arowai remove ambiguity by providing clearer trigger statements for the medium risk category.

Triggers for odour improvement plan

Contributes to answering **Question 6:** Do you agree with the proposed odour improvement plan triggers and the review requirement?

26 The consultation documentation (Table 6, page 16) indicates that one of the triggers for requiring an odour improvement plan are the number of complaints received in specified time period (i.e. three or more complaints in a three month period; or eight or more complaints received in a 12 month period).

27 It is unclear if multiple complaints about the same 'event' or issue would count as multiple individual complaints toward the trigger total, or if complaints on the same event / issue would count as one complaint for the purpose of the trigger.

28 The consultation documentation also specifies that the trigger relates to verification of those complaints by the consenting authority. Clarity is need as to what a verified complaint is (e.g. complaint investigated by the consenting authority and determined to be a breach of consent limits or wastewater standards), and how the consent authority receives the information (e.g. is it only complaints received by the consent authority from the public, or complaints the consent authority is advised about by consent holder notification or reporting?).

29 Complaints may not be an appropriate primary trigger.

30 The DCC **recommends** that Taumata Arowai provide clarity on these triggers to remove ambiguity and address the issues raised in this submission.

Consideration for dust

Contributes to answering **Question 8:** Do you agree with the focus on odour for the proposed discharge to air standard, or are there other aspects of discharge to air that should be considered, for example dust generated by treatment processes?

31 DCC considers that management of dust is likely to be appropriately managed through any land use consents or designations in place for a WWTP site, and so does not consider that wastewater environmental performance standards for discharges to air should manage dust. However, the DCC considers incorporating combustion-related contaminants generated by use of diesel generators and biogas flares into a discharge to air standard could be beneficial if these are common activities at WWTPs around New Zealand.

Discharge of metals to water

Natural environmental metal levels

Contributes to answering **Question 10**: Do you agree with using the proposed risk-based framework for metals? and **Question 11**: Do you agree with the proposed discharge risk triggers and receiving environment risk factors?

32 The proposed control levels for metals are based the discharge risk and receiving environment risk. A risk-based framework provides a more proportionate approach than applying the same requirements uniformly across all WWTPs. Having one risk-based approach across the country provides consistency of standards with consideration of environment types but does not take into account the specific chemical make-up of individual receiving environments or the 'zero state'. Natural levels of metals, such as arsenic, may be high in the receiving environments and national maximum limits may not allow capacity for discharges of naturally occurring metals from WWTPs.

33 In Otago, and other areas, the types of rocks present in the environment can impact mineral levels in groundwater, stormwater and other runoff that enters waterways. This may impact the minerals or metals occurring natural in the environment making the zero state of the environment different to other places.

34 Although water services providers can seek to control trade waste discharge to the wastewater network, metals in stormwater may also enter WWTPs through inflow and infiltration (I&I). A source control approach may be a more appropriate option than discharge controls.

35 The proposed approach outlined in the discussion document could result in water service providers being penalised for naturally occurring environmental levels of metals that they have no control over, or for metals inadvertently entering the wastewater network that may elevate discharge levels and exceed limits.

36 The DCC **recommends** that Taumata Arowai consider an effects-based approach where the naturally occurring metal levels can be taken into consideration along with the type of receiving environment and discharge risk.

37 The DCC **recommends** that Taumata Arowai consider applying source control measures in addition to discharge control measures. This could assist in the control of trade wastes

entering the wastewater network and would therefore assist in controlling the discharge to the environment.

Metal control levels

Contributes to answering **Question 12**: Do you agree with the proposed metals control levels?

38 The consultation document (Table 10, page 22) refers to monitoring of 'relevant metals' for discharges classified as 'control level 2'. The document lacks clarity about what relevant metals are being referred to, i.e. Is there a total list of metals in Appendix B? Does the same list of relevant metals apply in all areas? How are the lists of relevant metals chosen and by whom?

39 The requirements for level 2 control also refer to numerical values that "may be used" as investigation triggers. This creates some ambiguity as to when the 'may' applies and will trigger investigations. It is unclear what the intentions of this are.

40 The consultation document refers to the use of total suspended solids and total phosphorus as surrogate indicators for lower risk discharges or in lower risk receiving environments. No indication is provided for what the anticipated levels for these indicators will be. As calculations are based on levels of these surrogate indicators it would be appropriate to provide an indicator value to enable informed review of the proposal.

41 For very small WWTPs that are very low risk, because they do not receive any trade waste, it may be appropriate to not require any monitoring of metals at all. A risk assessment is appropriate, however, there could be high monitoring or treatment costs that would not achieve any additional protection of the environment.

42 The DCC **recommend**s that Taumata Arowai provide clarity about what relevant metals are and how this approach will work with consideration of the concerns raised.

43 The DCC **recommend**s that Taumata Arowai provide a limit/value for total suspended solids and total phosphorus to be used as surrogate indicators for lower risk discharges or in lower risk receiving.

Monitoring

Contributes to answering **Question 13**: Do you agree with the monitoring proposals for discharge of metals to water?

44 The consultation documentation outlines a distinction between information monitoring, surveillance monitoring, compliance monitoring (plus possible receiving environment monitoring), based on risk. This approach is supported by DCC.

45 The consultation document (section 5.3, Table 12, pages 23-24) outlines that the numerical metal limits would apply to dissolved metals because dissolved metals are generally more bioavailable and more relevant to toxicity. The DCC holds two discharge consents that include requirements to monitor total metals in the discharge, and that have discharge quality compliance limits set on total metals. As a result, DCC has baseline data for total metals in the

discharge but not for dissolved metals. This creates difficulty in making a comparison between current consent limits for metals for the DCC and the dissolved metals limits included in the proposal.

46 Regional and national environmental reporting indicates that dissolved metals – particularly dissolved copper and zinc – are commonly used where monitoring is intended to assess ecological toxicity. However, metals are not consistently included in routine regional State of the Environment programmes, and some monitoring and consent datasets use total metals. Existing total metals data may therefore not provide a direct baseline for standards expressed as dissolved concentrations.

47 The DCC **recommends** that Taumata Arowai should clearly explain the rationale for the selected metals analysis type and provide for paired total and dissolved monitoring during implementation.

48 The DCC **recommends** that Taumata Arowai consider existing metals-related data and ability to baseline from existing data. If proceeding with setting limits based on dissolved instead of total metals, make sure the rationale is clear and practical.

49 The DCC **recommends** that Taumata Arowai collects relevant data on total metals and dissolved metals to determine the correlation between the total metals data that may already be held by some water service providers or regional councils. This data would assist in determining the appropriateness of the proposed limits for dissolved metals.

Numerical limits

Contributes to answering **Question 14**: Do you agree with the proposed numerical limits and when they would apply?

50 The proposed numerical limits generally appear to be reasonable and fair. However, the proposed limits may be difficult to achieve for larger WWTPs in low energy environments.

51 Some of the proposed limits are more restrictive than the limits currently contained in the DCC consents, whereas for others the existing DCC consent limits are more stringent, depending on the classification of the receiving environment.

52 In the consultation document (Appendix B, page 28) there are two references in the wording to marine arsenic limits being included in Table B2. However, at present, Table B2 does not contain the numerical limits for arsenic.

53 The DCC **recommends** that Taumata Arowai provide clarity and certainty around the marine arsenic limits.

Conclusion

54 The DCC thanks Taumata Arowai once again for the opportunity to make a submission on the tranche two proposed wastewater environmental performance standards.

55 The DCC would welcome an opportunity to speak to this submission at any hearings held. The DCC would also welcome the opportunity to collaborate with Taumata Arowai and other interested parties more directly as the next phase of the development of draft standards progresses.

Kā mihi

Sophie Barker
MAYOR OF DUNEDIN

Water Services Authority
Taumata Arowai

Consultation on tranche two of the Wastewater Environmental Performance Standards

Discussion document



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Key terms used in this document

This section explains some of the technical terms used in this document. Where a term has a proposed meaning for consultation, the detailed proposed meaning is provided in the relevant proposal section.

Term	Plain English meaning
Bioaccumulation	When a substance, such as a metal, builds up in living things over time. For example, metals may build up in shellfish or other aquatic life.
Biosolids	Treated sludge from wastewater treatment. Biosolids may be reused where they meet relevant requirements.
Centrate	Liquid separated from sludge during wastewater treatment. It is often returned to the treatment process.
Discharge	The release of treated wastewater, air emissions, or other material from a wastewater treatment plant into the environment.
Dilution	The mixing of treated wastewater with water in the receiving environment. More dilution can reduce the concentration of contaminants.
End-of-pipe monitoring	Monitoring treated wastewater at the point it leaves the wastewater treatment plant before it mixes with the receiving environment.
Food webs	The feeding relationships between species in an ecological community. It represents the transfer of material and energy from one species to another within an ecosystem.
Information monitoring	Routine monitoring of metals in treated wastewater to collect information and build an evidence base. The results are not used as direct compliance limits but may help inform future review or investigation if elevated levels are found.
Leachate	Liquid that drains from waste, such as landfill material, and may contain contaminants.
Numerical limit	A set number that a discharge must meet, such as a maximum concentration of a contaminant in treated wastewater.
Odour improvement plan	A plan to investigate and fix ongoing or significant odour issues from a wastewater treatment plant.
Odour management plan	A document that explains how a wastewater treatment plant will manage, monitor, and respond to odour.
Receiving environment	The river, lake, estuary, coastal water, land, or air that receives a discharge.
Sensitive activity	A term used to apply the proposed odour risk classification. See section 4.2, Table Two for the proposed meaning for consultation.
Sludge	The thick solid or semi-solid material left behind during wastewater treatment.
Stormwater inflow	The entry of stormwater into a wastewater network. Stormwater inflow can introduce contaminants accumulated on urban surfaces, including metals from roads, roofs, industrial areas, and other catchment sources.
Suitably qualified and experienced person	A qualified and experienced independent professional who provides specialist information to support the proposed review requirements. The relevant review requirements are described in section 4.2.
Surveillance monitoring	Targeted monitoring of relevant metals where the discharge or receiving environment may present higher risk. Results may be used to identify whether further investigation, review, or stronger controls are needed, but are not direct compliance limits unless numerical limits apply.

Term	Plain English meaning
Surrogate indicator	A related measure that can help show whether metals may be present or whether further monitoring may be needed. For example, higher suspended solids concentrations may indicate that some metals may also be present.
Tankered waste	Wastewater or other liquid waste transported by truck to a wastewater treatment plant.
Territorial authority	A city or district council responsible for local services and infrastructure. In this document, territorial authorities may own or be responsible for wastewater treatment plants, either directly or through water service delivery arrangements.
Trade waste	Wastewater from businesses or industrial activities. It can include substances that are not usually found in household wastewater.
Wastewater treatment plant	A facility that treats wastewater before it is discharged, reused, or otherwise managed.

1. Executive summary

The Water Services Authority – Taumata Arowai (the Authority) is consulting on a second tranche of wastewater environmental performance standards (wastewater standards). There are two proposed wastewater standards, the first covering odour from discharges to air, and the second covering the presence of metals in discharges of treated wastewater from wastewater treatment plants.

Wastewater standards would be implemented through resource consents for wastewater treatment plants. Where a wastewater standard applies, consenting authorities would need to set consent conditions that are consistent with the requirements of that standard. Matters not covered by a wastewater standard would continue to be considered through current Resource Management Act 1991 processes.

The proposed wastewater standard for discharge to air would set nationally consistent requirements for managing odour, scaled to the risk profile of each wastewater treatment plant. Lower-risk plants would have basic planning, complaints, and reporting requirements; while higher-risk plants would be required to carry out a more detailed assessment, review, and improvement planning.

The proposed wastewater standard for the discharge of metals in treated wastewater to a water receiving environment (discharge of metals to water) would use a nationally consistent, risk-based approach to decide what monitoring or controls are needed. Lower-risk plants would generally rely on related measures and information monitoring, while stronger controls, including numerical limits, would be targeted to higher-risk discharges and more sensitive receiving environments.

Together, the proposals aim to complement existing wastewater standards to reduce duplication and uncertainty in consenting, improve transparency, and make requirements clearer and more proportionate for councils, wastewater operators, and communities. We are seeking submissions to gather feedback on the proposals outlined in this document to inform the development of fit-for-purpose regulatory standards.

How to make a submission

We welcome feedback on the proposed standards and how they could be implemented. You may answer any or all questions in this document or comment on any other relevant matter. A full list of engagement questions has been provided in **Appendix C**. Please support your views with evidence, examples, or references where possible.

Consultation will be open for six weeks from 10 September 2026 and closes at 5:00pm on 22 October 2026.

Submit your feedback by:

- upload your Word document or PDF directly to the Citizen Space portal via our Online Survey, or
- post to Level 2, Brandon Street, PO Box 628, Wellington 6140.

Please include your name or organisation details. Consultation information is available on the Authority's website. If you have any questions about this engagement or providing a submission contact stormwater_wastewater@taumataarowai.govt.nz

2. Overview of the proposals

The Authority, on behalf of the Minister of Local Government, is consulting on a second tranche of wastewater environmental performance standards under section 138 of the Water Services Act 2021.

A – What is the rationale for change?	The first tranche of wastewater standards established nationally consistent requirements for core wastewater discharges and reporting matters. This second tranche focuses on two matters not covered in the first tranche: discharges to air, particularly odour, and discharge of metals to water. These matters are currently managed through individual resource consents, which can result in different expectations across regions and consents. The proposed standards are intended to provide clearer national direction and reduce unnecessary duplication where common requirements can be set, while leaving site-specific matters to be considered through consent processes.
B – What does the second set of wastewater standards cover?	The proposed standards cover two areas: discharges to air from wastewater treatment plants, and discharge of metals to water from wastewater treatment plants. The discharge to air proposal focuses on odour management. The proposed standard for discharge of metals to water uses a risk-based approach to identify when indicators, surveillance monitoring, or numerical limits in the highest-risk situations may be needed.
C – How will territorial and consenting authorities use these standards?	Territorial authorities and water organisations would use the standards when applying for new or renewed resource consents for wastewater treatment plants. Where a wastewater standard applies, consenting authorities would need to set consent conditions that are consistent with the requirements of that standard. Matters not covered by a wastewater standard would continue to be considered through current Resource Management Act 1991 processes.
D – What are the expected benefits of the proposed standards?	The proposed standards are expected to support more consistent consenting, reduce unnecessary duplication, make expectations clearer for councils and communities, and better target technical requirements to risk. They are intended to provide a consistent national baseline while still recognising that the risk profile of each wastewater treatment plant and receiving environment can differ.
E – What was the process to develop these standards?	The proposals have been informed by submissions on the first set of wastewater standards, targeted engagement with the wastewater sector, review of current consent conditions, and technical advice commissioned by the Authority. The discharge of metals to water proposal reflects technical advice received by the Authority. Consultation feedback may result in changes before final decisions are made and regulations are drafted.

Implementing the standards in practice

Applying the standards through resource consents

Territorial authorities and water organisations are working through how the existing wastewater standards apply as they progress through investment decisions or applications for resource consents. Consenting authorities are considering consenting processes under the new arrangements, including how standards are implemented through consent conditions. The Authority is working with MCERT and regional councils to develop guidance that gives territorial authorities, water organisations, and consenting authorities more certainty about how the standards apply.

There are two optional consultation questions (16 and 17) that ask about additional opportunities to streamline resource consent applications for wastewater treatment plants and implementation issues with the existing wastewater standards.

3. Context

Wastewater treatment plants play an important role protecting public health and the environment by collecting and treating wastewater before it is discharged or reused. The Water Services Act 2021 (the Act) (section 138) enables the Authority to make wastewater standards. The Authority developed a first tranche of wastewater standards in 2025 that focused on treated wastewater discharges to water and land, beneficial reuse of biosolids, and monitoring of overflows. The Authority is now developing a second tranche of proposed standards to clarify and standardise other matters that commonly arise through consenting.

The Authority is empowered to develop additional wastewater standards where appropriate

The Local Government (Water Services) Act 2025 enables standards to be set through regulations made by Order in Council, on the advice of the responsible Minister. Standards may include (but are not limited to) requirements, limits, conditions, or prohibitions related to activities associated with wastewater networks, including:

- Discharges to land, air, or water,
- Biosolids and any other byproducts from wastewater,
- Energy use, and
- Waste that is introduced by a third party into a wastewater network (for example, trade waste).

The Local Government (Water Services) Act 2025 expands and clarifies how standards affect processes and decisions made under the Resource Management Act 1991. The Act also provides that wastewater standards may apply to activities associated with wastewater networks, as defined in the Act.

The Government is progressing broader reform of the resource management system. Any consequential changes needed to align the wastewater standards with the new resource management framework will be considered after the National Environment Bill has been enacted, as part of a broader review of secondary legislation to support integration with the new regime.

In line with the first tranche of wastewater standards, the proposals in this discussion document are focused on wastewater treatment plants. The standards do not apply to privately owned networks, septic tanks, or onsite wastewater systems. This includes onsite systems with primary, secondary or disinfection treatment, such as systems serving campground ablution blocks or public toilets. In these situations, wastewater is generally generated from one or more buildings within a single land area or site.

This consultation focuses on two proposed wastewater standards: discharges to air from wastewater treatment plants, and discharge of metals to water from wastewater treatment plants.

The Authority upholds obligations under the Treaty of Waitangi in the delivery of its functions

The Authority has obligations under the Water Services Authority—Taumata Arowai Act 2020 in relation to the Treaty of Waitangi, including to engage with Māori and understand the perspectives of Māori. The Authority also has specific, legislated obligations to iwi and hapū in the Whanganui, Whangaehu, Waikato and Waipā river catchments under relevant Treaty Settlement Acts. These obligations apply when we exercise all of our functions, powers, and duties under the Water Services Act 2021, including in our system leadership and national oversight role for wastewater.

The Authority is proposing a national approach for discharge to air and discharge of metals to water

The Authority has focused this second set of proposals on areas where standardisation is likely to reduce duplication and uncertainty in consenting, while still supporting environmental protection.

The first proposed standard covers odour, a by-product of some wastewater collection and treatment processes. Odour can arise from wastewater becoming septic, inlet works, primary treatment, sludge handling, biosolids processing, and treatment plant upset conditions. Most of the time, odour can be managed through good design, operation, maintenance, and timely response to complaints. However, where odour is persistent or significant, it can affect people's enjoyment of their homes, recreation areas, and community spaces. The proposed standard for discharge to air outlined in this document is intended to provide a nationally consistent baseline for managing odour while still recognising that risk varies by site.

Secondly, a standard for discharge of metals to water has been developed to manage the long-term impact of metals on receiving environments through a risk-based approach. Metals in wastewater are different from nutrients and microbiological contaminants. Their potential effects depend on the type of metal, its concentration, the form it is in, the dilution available in the receiving environment, and whether it can accumulate in sediment or shellfish. Risks associated with metals in treated wastewater are increased where a wastewater treatment plant receives significant non-domestic inputs, such as trade waste, tankered waste, landfill leachate, or where metals are used in treatment processes. The proposals are designed to be proportionate and avoid unnecessary monitoring or numerical limit requirements for lower-risk plants, while giving consenting authorities, plant operators, and communities clearer expectations for higher-risk plants.

The proposed standards are intended to address these recurring consenting matters in a way that is nationally consistent, proportionate to risk, and clear about what should continue to be managed through site-specific consent processes. The proposals draw on common resource consent conditions, current practice, the first set of wastewater standards, and technical feasibility testing across a range of wastewater treatment plants.

Tranche 2 wastewater standards have been informed by expert advice, consultation, and analysis

The proposed standards have been developed following feedback on the first set of wastewater standards, targeted engagement with wastewater treatment plant operators,

consenting authorities and technical experts, and technical advice commissioned by the Authority from wastewater experts. During consultation on the first tranche of standards, several submitters supported further national standardisation for activities not covered in that first set, including discharges to air and additional contaminants such as metals.

The technical advice received supports a management-based framework for odour rather than numerical odour limits, and a risk-based framework for metals that recognises the limited national information currently available. Feedback received through consultation will be considered before final decisions are made, and may result in changes to the proposed thresholds, triggers, monitoring requirements, control levels, or numerical limits before regulations are drafted.

We'd like to hear from you - The Authority is seeking feedback on whether the proposed requirements are practical, proportionate, and clear enough to be implemented through future resource consents. You'll find questions after each proposal, and a full list of questions is provided in **Appendix C**.

4. Wastewater environmental performance standard for discharge to air

Proposal on-a-page: discharge to air

A – What is the rationale for change?	Discharges to air from wastewater treatment plants are currently managed through a mix of consent conditions and regional plan rules. Requirements commonly address odour, complaints, odour control equipment, and management plans, but they vary between regions and consents. A national standard would provide clearer and more consistent expectations for managing odour from wastewater treatment plants.
B – What does the proposed standard cover?	The proposed standard would focus on odour from wastewater treatment plants. It would classify plants by odour risk and require documented management, monitoring and response processes that are proportionate to that risk. Dust from dried biosolids handling is not part of the proposed discharge to air standard. Feedback is sought on whether dust effects associated with wastewater treatment plant processes should be addressed through the minimum performance requirements.
C – How would territorial and consenting authorities use the standard?	Territorial authorities and water organisations would use the standard when applying for new or renewed resource consents. Consenting authorities would implement the standard through consent conditions, use it to assess whether proposed odour controls are proportionate to the risk at each site, and require an odour improvement plan where an existing odour nuisance is identified.
D – What are the expected benefits?	The proposed standard would support more consistent consent conditions, reduce uncertainty and disputes about odour management, make expectations clearer for communities and plant operators, and encourage good design, operation, and maintenance. Higher-risk plants would be subject to stronger controls, while lower-risk plants would avoid unnecessarily stringent requirements. Where an odour nuisance is identified, the standard would provide for a structured improvement process.
E – What was the process to develop the proposal?	The proposal has been informed by feedback on the first set of wastewater standards, review of current consent conditions, targeted engagement, and technical advice on a management-based framework for odour. Feasibility testing across a range of wastewater treatment plants has helped test whether the proposed odour risk classification, control levels, sensitive activity definition, improvement plan process, and thresholds are practical.

4.1 Why this standard is proposed

Odour is the main air discharge issue addressed by the proposed standard

Other air-related matters are addressed through existing regulatory mechanisms. Greenhouse gas emissions are regulated through other national frameworks, including the Resource Management (National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat) Regulations 2023. Risks associated with aerosols and spray drift are considered through the discharge to land standard, including requirements for risk management and operations and maintenance plans

The proposed discharge to air standard is focused on odour from municipal wastewater treatment plants. Activities and matters that would be excluded from the proposed standard are listed in **Appendix A**.

Odour from wastewater treatment plants can affect people's use and enjoyment of places and become a significant issue during consenting for wastewater treatment infrastructure. Research conducted both internationally and in New Zealand correlates odour pollution from wastewater treatment plants (such as hydrogen sulphide and ammonia) with community complaints and reported symptoms such as nausea, headaches, and eye/throat irritation.[1]

1 Wastewater Treatment Plants as a Source of Malodorous Substances Hazardous to Health, Including a Case Study from Poland; PHCC. (2025). More than just a bad smell: Odour pollution and health in Aotearoa New Zealand | PHCC

Managing the discharge of odours has been the subject of significant effort through local level mitigation strategies and national level guidance.[2] However, current requirements vary across regional plans and individual consents, which can lead to uneven odour management and uncertainty regarding whether (or what) controls are necessary such as biofilters and buffer zones.

Information gaps make it difficult to fully understand odour issues from wastewater treatment plants at a national level. The Authority is seeking more information from submitters about where odour issues arise, how significant they are, how they are managed, and the level of support for nationally consistent requirements.

The proposed standard would address this by setting a consistent framework for managing odour. It would set minimum expectations for all wastewater treatment plants and require stronger controls where odour risk is higher, or an existing odour nuisance has been identified. This is intended to improve consistency while avoiding unnecessary requirements for lower-risk plants.

Current position: Based on feedback, analysis and technical advice, the Authority has prioritised setting a national standard for discharge to air as part of the second tranche of wastewater standards.

We'd like your feedback

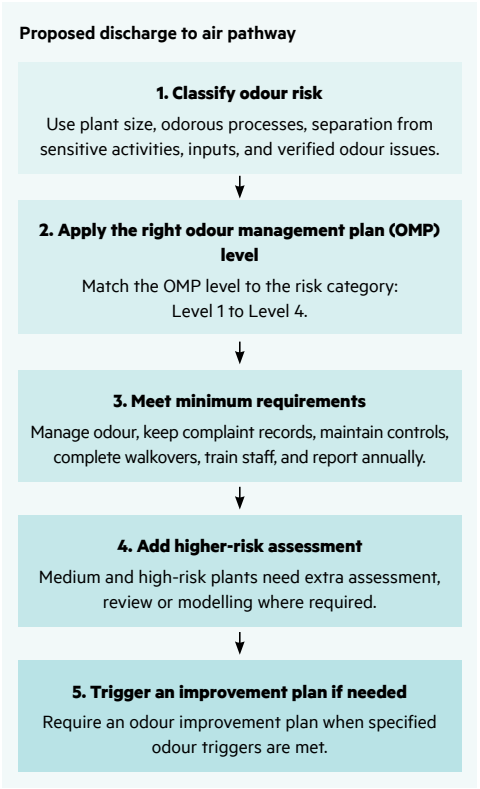
Question 1: Do you agree that a national standard should be developed for discharges to air from wastewater treatment plants focusing on odour management?

4.2 How the proposed discharge to air standard would work

The Authority has developed a framework for managing odour

The Authority has developed a proposed pathway that is intended to make odour requirements proportionate to risk. All plants would be required to meet minimum requirements, but higher-risk plants would need more detailed planning, review, and reporting. The pathway is outlined below in Figure 1 and explained in further detail in the following sections.

Figure 1: Proposed odour management framework.



How the standard would apply

The proposed discharge to air standard would apply through resource consent conditions for wastewater treatment plants. The sections below follow the pathway in Figure One: first classify the plant's odour risk, then apply the relevant odour management plan level, meet the minimum performance requirements, use extra assessment and review where risk is higher, and trigger an odour improvement plan if needed.

2 See for example, wastewater_odour_management_manual.pdf; CWTP-Odour-mitigation-plan-Feb-2026-FINAL.pdf

1. Classify the plant's odour risk

A risk classification is intended to set out the level of effort required as part of the odour management plan (OMP) to make the level of odour planning, monitoring and review proportionate to risk. The odour risk classification outlined in Table 1 below is based on the unmitigated odour potential of the wastewater treatment plant and the separation distance between odorous processes and sensitive activities.

For this classification, treatment capacity would be based on the projected maximum monthly average population equivalent at the end of the 35-year consent period. A separate suitably qualified and experienced person (SQEP) review of treatment capacity is not proposed.

Table 1, overview of odour risk classification thresholds.

Risk category	Proposed trigger	Proposed result
Very low risk	New or existing wastewater treatment plants serving less than or equal to 100 population equivalent and with no history of verified odour complaints.	OMP Level 1 applies.
Low risk	New or existing wastewater treatment plants serving less than or equal to 100 population equivalent with verified existing odour issues.	OMP Level 2 applies.
Low risk	New or existing wastewater treatment plants serving more than 100 and up to 500 population equivalent.	OMP Level 2 applies.
Low risk	New or existing wastewater treatment plants serving 501 to 1,000 population equivalent, with no sensitive activities within 150 metres of odorous processes, and receiving domestic and service trade wastes only, or only a small amount of industrial waste.	OMP Level 2 applies.
Medium risk	All new or existing wastewater treatment plants that are not classified as very low, low, or high risk.	OMP Level 3 applies.
High risk	New wastewater treatment plants serving more than 15,000 population equivalent, with sensitive activities within 200 metres of odorous processes.	OMP Level 4 applies.
High risk	New or existing wastewater treatment plants serving more than 30,000 population equivalent, with sensitive activities within 300 metres of odorous processes.	OMP Level 4 applies.
High risk	New or existing wastewater treatment plants serving more than 50,000 and up to 100,000 population equivalent, with sensitive activities within 400 metres of odorous processes, and with uncovered preliminary treatment, uncovered primary treatment, thermal drying, anaerobic digestion, composting, solar drying, sludge pyrolysis, or similar sludge or biosolids processing.	OMP Level 4 applies.
High risk	New or existing wastewater treatment plants serving more than 100,000 population equivalent, with sensitive activities within 500 metres of odorous processes.	OMP Level 4 applies.
High risk	New or existing wastewater treatment plants serving more than 400,000 population equivalent.	OMP Level 4 applies.

There are proposed definitions for applying the odour risk classification

Table 2 sets out definitions for key terms are used to apply the proposed odour risk classification. The proposed definition of sensitive activity is a key issue for consultation, including how existing, consented, planned, or future sensitive activities should be treated.

Table 2, key definitions for odour risk classification.

Term	Proposed meaning for consultation
Sensitive activity	A legally established or consented activity that may be sensitive to odour. This includes dwellings, residential zoned areas, care centres, hospitals, health facilities, education facilities, marae, built community facilities including sports clubrooms and stadiums, areas of high cultural value as defined in district plans, and visitor accommodation. Activities in industrial zoned areas would not be treated as sensitive activities for the purpose of classifying odour risk. Properties that have provided written approval, or equivalent, would also be excluded. Outdoor recreational areas such as open sports fields, reserves and golf courses, commercial areas, and curtilage such as roads, sheds and gardens would not be sensitive activities for this classification.
Odorous processes	Parts of the wastewater treatment plant that are likely to generate odour. This includes preliminary treatment, primary treatment, secondary treatment including aeration, facultative ponds and bioreactors, sludge and biosolids handling, management and processing, odour control units, septage receival, and onsite storage, conveyance and pumping of untreated wastewater, sludge, biosolids, and associated material such as screenings and centrate.
Non-odorous processes	Parts of the site that generally generate little or no odour and would not be used to measure separation distance for the odour risk classification. This includes tertiary treatment excluding advanced biological processes, storage of treated wastewater before discharge, auxiliary buildings such as workshops and control rooms, and chemical storage.
High-risk odorous processes	Uncovered preliminary treatment, uncovered primary treatment, thermal drying, anaerobic digestion, composting, solar drying, and sludge pyrolysis. These processes are used only for the specific high-risk odour classification triggers in the proposed framework.
Population equivalent	A way of estimating the scale of a wastewater treatment plant by reference to the organic biodegradable load it is expected to treat. For this proposal, one population equivalent is based on an organic load of 85 grams per person per day.
Treatment capacity	The maximum monthly average population equivalent serviced by the wastewater treatment plant projected to occur at the end of the 35-year consent period.

2. Apply the odour management plan level

Odour management plans would need to be practical for operators and staff to use during both normal and abnormal operating conditions. The proposed discharge to air standard would not prescribe one odour control technology for every plant. Instead, it would require operators to identify and implement controls that are appropriate for the site and proportionate to its risk as part of an odour management plan. Table 3 summarises the different levels for odour management plans based on a plant's risk classification.

Table 3, overview of different levels for odour management plans.

Plan level	Plants covered	Proposed content
Level 1 odour management plan	Very low-risk plants	A simple plan that identifies key personnel, site location, nearby sensitive activities, main processes, odour sources, basic mitigation measures, inspection and maintenance procedures, complaints process, staff training, review requirements, and annual reporting. Requirements would be proportionate to very small plants. The OMP would be reviewed at least every five years, and annual reporting would focus on complaints received.
Level 2 odour management plan	Low-risk plants	All Level 1 matters, with additional detail where needed on odour sources, mitigation methods, inspection and maintenance procedures, odour monitoring, complaint response, staff training, review, and annual reporting. The OMP would be reviewed at least every five years, and annual reporting would focus on complaints received.
Level 3 odour management plan	Medium-risk plants	All Level 2 matters, plus more detailed odour mitigation methods, operational performance criteria and how they will be monitored, contingency procedures for plant malfunctions, submission to the consenting authority for certification or approval, and a best practicable option report for new plants and significant upgrades. The OMP would be reviewed at least every two years, and annual reporting would include complaints received and actions taken to resolve odour complaints.
Level 4 odour management plan	High-risk plants	All Level 3 matters, plus an odour risk assessment (ORA) to inform the OMP, independent SQEP review of the OMP and ORA, submission to the consenting authority for certification or approval, and modelling where required to support proposed controls. Best practicable option requirements would apply to new plants and significant upgrades, and where an odour improvement plan is triggered. The OMP would be reviewed at least annually, and annual reporting would include complaints, actions taken, and compliance with the OMP.

3. Meet the minimum performance requirements

Regardless of the risk level classification or odour management plan level, every plant would be required to meet minimum requirements. These minimum requirements are outlined in Table 4 below.

Table 4, minimum requirements for odour management for wastewater treatment plants

Requirement area	Minimum requirement	Evidence or records
Odour effects	Beyond the boundary of the site, there must be no odour caused by discharges from the site that, in the opinion of an enforcement officer, is noxious, offensive, or objectionable.	Complaints, investigations, regulator findings, and follow-up actions
Odour management plan	The operator must prepare an OMP that reflects the odour risk classification for the site.	Current OMP, version history and review records
Operate in accordance with the plan	The operator must operate and undertake activities at the site in accordance with the OMP at all times.	Evidence that procedures in the OMP are being followed
Complaints register	The operator must keep an odour complaints register, including the location where odour was detected, date and time, wind speed, and direction where available, likely cause, and corrective action taken. Records would be kept for at least 10 years and summarised in annual reporting.	Complaints register and corrective action records
Odour control equipment	Odour control equipment must be operational, functioning correctly, and maintained through an inspection and maintenance programme.	Maintenance records, outage records, and corrective action records
Fugitive emissions	Buildings, covers, ducting, odour control units, and related equipment must be maintained in good condition and, as far as practicable, free from leaks to minimise unintended odour releases.	Inspection, maintenance, and repair records
Site walkovers	Walkover inspections must be carried out at the frequency set in the OMP to identify odours that may be originating from the site. Any odour potentially detectable off-site must be investigated and remedial action taken as soon as practicable where needed.	Walkover records and follow-up actions
Staff training	Staff with duties related to the management, operation, maintenance or repair of odour-critical processes and plant must be appropriately trained and competent, with training records kept.	Training records
Annual reporting	The operator would provide annual reporting to the consenting authority. For very low and low-risk plants, annual reporting would focus on complaints received. For medium-risk plants, annual reporting would include complaints received and actions taken to resolve odour complaints. For high-risk plants, annual reporting would also include compliance with the OMP, monitoring required by the OMP, progress on any odour improvement plan (OIP), any infringement or abatement notices, any non-compliance with minimum performance requirements, and any change in odour risk classification.	Annual environmental report

4. Use extra assessment and review where risk is higher

Medium and high-risk plants would have additional requirements to make sure odour controls are proportionate and robust. Table 5 outlines these additional requirements.

Table 5, additional management requirements that apply to medium and high-risk plants.

Requirement	Very low risk	Low risk	Medium risk	High risk
OMP level	Level 1	Level 2	Level 3	**Level 4**
SQEP review of OMP	No	No	No	**Yes**
Best practicable option for new plants and significant upgrades	No	No	Yes	**Yes**
Odour risk assessment	No	No	No	**Yes**
SQEP review of odour risk assessment	No	No	No	**Yes**
Modelling to support proposed mitigation	No	No	New plants and significant upgrades above 20,000 population equivalent	New plants and significant upgrades
Annual reporting	Yes	Yes	Yes	**Yes**

What the additional requirements mean

The additional requirements in Table Five provide more assurance where odour risk is higher, or where a new plant or significant upgrade is proposed:

- The SQEP review of OMP would check whether the odour management plan or odour risk assessment is appropriate and proportionate
- The best practicable option assessment would consider reasonably available design, operational and mitigation options, and identify the best overall way to prevent or minimise odour effects.
- The odour risk assessment would assess likely odour sources, pathways, sensitive activities, and proposed controls.

When odour dispersion modelling would be required

Odour dispersion modelling would not be a performance standard or pass/fail test. It would be used as supporting evidence to show whether proposed mitigation is appropriate. Modelling would be required for new or significantly upgraded medium-risk plants above 20,000 population equivalent, and for all new or significantly upgraded high-risk plants.

5. Trigger an odour improvement plan if needed

Odour improvement plans would be designed to provide a structured pathway for resolving odour issues without prescribing the same technical solution for every wastewater treatment plant. Table 6 outlines the proposed process for triggering and completing an improvement plan.

The odour improvement plan is intended to provide a clear, timely and consistent mechanism for addressing odour issues when the proposed triggers are met.

Table 6, process for triggering and completing an odour improvement plan

Step	What happens
1. Trigger	An odour improvement plan would be required if any of the following triggers are met: • an abatement notice has been issued; • the consenting authority determines, taking into account frequency, intensity, duration, offensiveness, and location (FIDOL) factors, that community amenity is being significantly affected by the wastewater treatment plant; • three or more complaints verified by a consenting authority officer are received within a 90-day period; • eight or more complaints verified by a consenting authority officer are received within any 12-month period; or • one of these triggers has occurred in the 12 months before a consent is granted. Complaints associated with planned maintenance of limited duration, short-duration unscheduled maintenance, or one-off or infrequent unverified complaints would not by themselves trigger an odour improvement plan.
2. Initial investigation	The operator would complete an initial investigation into the source and cause of the odour issue and provide the findings to the consenting authority within a specified timeframe.
3. Plan development	The operator would assess options for additional mitigation, identify the preferred response, demonstrate that the response represents the best practicable option, and propose implementation timeframes.
4. Independent review	For medium and high-risk plants, the odour improvement plan would be reviewed by a suitably qualified and experienced person before being submitted to the consenting authority.
5. Implementation and confirmation	The operator would implement the approved plan, report any delays, confirm when the measures have been implemented, and update the odour management plan.

4.3 Implement through consents and review if the plant changes

For a new or renewed resource consent, the applicant would need to identify the proposed odour risk classification, provide the information used to support that classification, and propose the odour management plan level that applies. The consenting authority would then implement the relevant requirements through consent conditions.

A plant's odour risk classification may need review during the consent period if changes to treatment capacity, processes, or odorous process locations affect separation distances to sensitive activities. The classification would be set when consent is granted, based on existing and consented sensitive activities. New sensitive activities would only be considered later if they were permitted under the district plan rules, or equivalent planning instrument, operative when consent was granted. Changes needed because of plant changes would be implemented before those changes become operational. Changes needed because of new sensitive activities would be implemented within 12 months, or another timeframe agreed with the consenting authority.

4.4 Worked examples

Three worked examples have been provided in Table 7 below to illustrate how the pathways for the discharge to air standard would apply. These examples show how the standards would apply based on the risk classification for each wastewater treatment plant.

Table 7, worked examples of how the discharge to air standard would apply to wastewater treatment plants of various sizes and risk profiles.

Example	Risk classification	Requirements that would likely apply
A small oxidation pond system serving a small community, with good separation from nearby sensitive activities and no significant industrial inputs.	**Low risk**	Minimum performance requirements, Level 2 odour management plan, complaints register, walkover inspections, and annual reporting.
A treatment plant that does not meet the low-risk or high-risk triggers, is located close to dwellings, and has odorous processes that can be managed through standard operational controls.	**Medium risk**	Minimum performance requirements, Level 3 odour management plan, consenting authority certification or approval, best practicable option assessment for new plants or significant upgrades, OMP review at least every two years, and annual reporting on complaints and actions taken.
A treatment plant that meets one of the high-risk odour classification triggers, such as a large plant close to sensitive activities or a plant with specified high-risk odorous processes close to sensitive activities. If an existing odour nuisance is occurring, an odour improvement plan would be triggered, but that nuisance would not by itself determine the odour risk classification.	**High risk, where the high-risk triggers are met. An existing odour nuisance would trigger an odour improvement plan but would not by itself determine the odour risk classification.**	Minimum performance requirements, Level 4 odour management plan, odour risk assessment, independent review, modelling where required, best practicable option assessment for new plants or significant upgrades, OMP review at least annually, annual reporting on complaints, actions taken and OMP compliance, and an odour improvement plan if odour nuisance is occurring. For medium and high-risk plants, the odour improvement plan would be reviewed by a suitably qualified and experienced person.

Current position: The Authority has developed a proposed pathway for classifying and applying a proportionate risk-based approach to manage odour.

We'd like your feedback

Question 2: Do you agree with using the proposed management-based framework for odour?

Question 3: Do you agree with the proposed odour risk categories, thresholds, and definitions?

Question 4: Do you agree with the proposed odour management plan levels and requirements?

Question 5: Do you agree with the proposed minimum performance requirements for all treatment plants?

Question 6: Do you agree with the proposed odour improvement plan triggers and the review requirement?

Question 7: Is there anything important missing from the proposed discharge to air standard to support effective odour management at wastewater treatment plants?

Question 8: Do you agree with the focus on odour for the proposed discharge to air standard, or are there other aspects of discharge to air that should be considered, for example dust generated by treatment processes?

5. Wastewater environmental performance standard for discharge of metals to water

Proposal on-a-page: discharge of metals to water

A – What is the rationale for change?	Consent requirements for metals in wastewater discharges are inconsistent. Most wastewater treatment plant consents do not include conditions relating to metals in treated wastewater and, where they do, conditions often require monitoring only rather than enforceable limits. Available information suggests the effects of metals in the environment are not widespread, but the current state is not well understood nationally because the evidence base is limited. A standard for discharge of metals to water would improve consistency, target monitoring, and controls to higher-risk situations, and help build a better national picture of metals in treated wastewater over time.
B – What does the proposed standard cover?	The proposed standard would apply to discharges of treated wastewater to freshwater and marine receiving environments. It would cover metals of concern, including aluminium, arsenic, cadmium, chromium, copper, lead, mercury, nickel, zinc and, in some cases, iron. The proposed standard would not apply to discharges of treated wastewater to land, which would continue to be managed through existing consent processes and any relevant wastewater standards.
C – How would territorial and consenting authorities use the standard?	Territorial authorities and water organisations would use the standard to identify the level of monitoring or control needed when applying for new or renewed resource consents. Consenting authorities would implement the standard through consent conditions, using the risk framework to determine whether information monitoring, surveillance monitoring or compliance monitoring with numerical limits are required, and whether additional receiving environment monitoring is warranted.
D – What are the expected benefits?	The proposed standard would provide a clearer and more consistent approach to managing metals in wastewater discharges. The proposal avoids unnecessary routine metals compliance monitoring and numerical limits for lower-risk plants, focusing attention on higher-risk discharges and receiving environments. Monitoring collected under the proposed standard would strengthen the national understanding of metals in wastewater over time and would support transparency and public confidence in how risks associated with metals are managed.
E – What was the process to develop the proposal?	The proposal has been informed by feedback on the first set of wastewater standards, targeted engagement, review of current consent conditions and monitoring data, and technical advice on a risk-based framework. Feasibility testing considered discharge risk factors, receiving environment risk factors, possible surrogate indicators, monitoring requirements, numerical limits, treatment feasibility, and options for implementation. The final proposal is to consult on a risk-based approach with proposed numerical limits only where both discharge risk and receiving environment risk are high, while continuing to build the evidence base.

5.1 Why this standard is proposed

Managing metals in wastewater supports the long-term health of receiving environments

Metals can enter wastewater treatment plants from domestic wastewater, trade waste, industrial discharges, tankered waste, landfill leachate, stormwater inflow, and treatment processes. International and domestic research shows that metals can affect aquatic life through toxicity, accumulate in sediment, or bioaccumulate in food webs, depending on the metal, its concentration, the receiving environment, and site-specific conditions.

The national picture for metals in wastewater discharges is incomplete. Current consent requirements and monitoring practices vary, and available information does not indicate that metals effects are widespread for many plants. Risk is also not evenly distributed. Routine numerical metals limits may therefore be unnecessary for lower-risk plants, while more information or stronger controls may be needed where there are higher-risk discharges or sensitive receiving environments.

The proposed standard would use a risk-based framework rather than applying numerical limits to all wastewater treatment plants. This will enable monitoring and controls to be applied where there is a greater risk of adverse effects, while avoiding unnecessary regulatory burden on lower-risk plants. It would also help strengthen the national evidence base of metals in wastewater over time.

Current position: Based on feedback, analysis and technical advice, the Authority has prioritised setting a wastewater environmental performance standard for discharge of metals to water as part of the second tranche of wastewater standards.

We'd like your feedback

Question 9: Do you agree that a national standard should be developed for discharge of metals in treated wastewater to water receiving environments?

5.2 How the proposed metals to water standard would work

The proposed pathway outlined below in Figure 2 is intended to avoid unnecessary compliance monitoring and numerical limits for metals in lower-risk discharges, while requiring surveillance monitoring or stronger controls where the discharge and receiving environment indicate higher risk.

Figure 2: Proposed discharge of metals to water management framework



How the standard would apply

The proposed discharge of metals to water standard would apply through resource consent conditions for discharges of treated wastewater to water from wastewater treatment plants. It would use the pathway above to determine the level of monitoring or control required, based on both the risk from the discharge and the sensitivity of the receiving environment.

1: Check scope

The proposed discharge of metals to water standard would apply only to discharges of treated wastewater to water from wastewater treatment plants. It would not apply to other discharge types, onsite wastewater systems, or matters outside the scope of the proposed wastewater environmental performance standards.

The proposed standard does not apply to discharges of treated wastewater to land. Those discharges are addressed through the first tranche of wastewater standards and existing resource consent processes because they involve different environmental pathways and controls, including soil conditions, groundwater, land application rates, and how contaminants move through soil and vegetation.

2: Identify discharge risk

The proposed standard for the discharge of metals to water would be subject to a risk assessment based on the expected inputs to the wastewater treatment plant. A simple risk framework is proposed based on whether each component is "high" or "other than high."

The risk assessment focuses on the types of inputs received by a plant, rather than plant size alone. This reflects that smaller plants can still receive higher-risk inputs such as trade waste, tankered waste or landfill leachate, while some larger plants may have lower metals risk depending on their inputs and treatment processes. Further information on the proposed triggers for managing discharge of metals to water is outlined further below in Table 8.

Table 8, proposed triggers for the discharge of metals to water standard.

Discharge risk	Proposed trigger	Reason
Other than high	The plant receives mainly domestic wastewater and service trade waste, does not receive conditional trade waste, significant trade waste, tankered waste or landfill leachate that may contain metals, does not use aluminium or iron-based chemicals in water or wastewater treatment in a way that may affect the discharge, and does not receive significant stormwater loads through combined sewers or engineered stormwater connections to the wastewater network.	These plants are less likely to have elevated metals loads and should generally be managed through surrogate indicators and information monitoring, rather than numerical limits.
High	The plant receives conditional trade waste, significant trade waste, tankered waste or landfill leachate that may contain metals; uses aluminium or iron-based chemicals in water or wastewater treatment, phosphorus removal or odour control in a way that may affect the discharge; or receives significant stormwater loads through combined sewers or engineered stormwater connections to the wastewater network.	These inputs or treatment practices may increase metals concentrations or loads in the discharge and justify targeted monitoring or stronger controls.

3: Identify receiving environment risk

Receiving environment is another important factor used in the proposed standard to determine the level of effort required to manage the discharge of metals to water. Table 9 below outlines the different classifications and proposed triggers based on receiving environment characteristics.

While lake receiving environments are not proposed as an automatic high-risk trigger, proposed lake limits are included in **Appendix B** for situations where Level 3 controls apply.

Table 9, proposed triggers for the discharge of metals to water standard based on receiving environment.

Receiving environment risk	Proposed trigger	Reason
Other than high	Discharge to open ocean, high-energy coastal water, low-energy coastal water, lakes, or freshwater with moderate to high dilution.	These settings are not proposed as automatic high-risk triggers, although monitoring or limits may still apply depending on the combined discharge and receiving environment risk.
High	Discharge to low or very low dilution freshwater, currently proposed as a dilution ratio below 50, or to an estuary.	These environments may be more sensitive to metals because dilution is lower or because metals may accumulate in sediment.
Naturally elevated metals	Receiving environments with naturally elevated metals because of geology or background conditions.	Naturally elevated metals should be considered for the specific metal affected. This should not automatically exclude a discharge from control, because some ecosystems may already be close to stress thresholds. A site-specific assessment may still be needed through resource consent processes.

4: Assign control level and 5: apply controls

The requirements of the standards are outlined below in Table 10 based on the risk profile determinations in 1 and 2 of the pathway (Figure 2). Three classifications have been developed that apply proportionate requirements for plants based on risk profile.

Table 10, proposed controls and management requirements for metals.

Discharge risk	Receiving environment risk	Proposed control level	What this would require
Other than high	**Other than high**	**Level 1**	Use total suspended solids and total phosphorus, where relevant, as surrogate indicators. Information monitoring of treated wastewater would apply. Numerical metals limits would not apply.
Other than high	**High**	**Level 2**	Use total suspended solids and total phosphorus, where relevant, as surrogate indicators, plus surveillance monitoring for relevant metals. Monitoring results would generally be reviewed within 10 years, or earlier if the monitoring data indicates elevated risk or adverse environmental effects. Numerical values may be used as investigation triggers rather than direct compliance limits.
High	**Other than high**	**Level 2**	Use total suspended solids and total phosphorus, where relevant, as surrogate indicators, plus surveillance monitoring for relevant metals associated with the high-risk input or treatment process. Monitoring results would generally be reviewed within 10 years, or earlier if the monitoring data indicates elevated risk or adverse environmental effects. Numerical values may be used as investigation triggers rather than direct compliance limits.
High	**High**	**Level 3**	Numerical limits and end-of-pipe compliance monitoring would apply for relevant metals. Receiving water and/or sediment monitoring may also be required by consenting authorities through consent conditions. Guideline values for receiving water and sediment would be used as review triggers rather than direct end-of-pipe compliance limits.

How control levels affect monitoring

The proposed control levels determine what type of monitoring would apply. In general, requirements increase with risk: lower-risk scenarios rely on surrogate indicators and information monitoring, while higher-risk scenarios may require surveillance monitoring, investigation triggers, or numerical limits.

Table 11 provides more detail on the proposed monitoring suite.

Table 11, suite of monitoring proposals for discharge of metals to water.

Requirement	Proposal for consultation
Metals suite	The proposed suite for numerical limits is aluminium, arsenic, cadmium, chromium, copper, lead, mercury, nickel, and zinc. Iron is also proposed to be included in the monitoring suite where relevant, particularly where iron-based treatment chemicals are used, but no national numerical limit is currently proposed for iron. Other metals may also be included where they are identified through the risk assessment.
Surrogate indicators	Surrogate indicators are related monitoring measures that can help show whether metals may be present or whether further monitoring may be needed. Total suspended solids would be used as the main surrogate for particulate-bound metals. Total phosphorus may also be relevant where phosphorus removal requirements are linked to solids removal or metal-based dosing. Where aluminium or iron-based chemicals are used for phosphorus removal or odour control, monitoring may be needed because effects can depend on pH, dilution, and site-specific chemistry.
Sampling frequency	Information monitoring is proposed to be quarterly. Surveillance and compliance monitoring would be proportionate to plant size: quarterly for small plants, monthly for medium plants, and fortnightly for large plants. These frequencies are intended to balance the need for better information with the cost of additional monitoring.
Review point	Monitoring results would generally be reviewed within 10 years. The review would assess whether controls remain proportionate and whether monitoring should be reduced, increased, or converted into numerical limits. Earlier review or intervention would still be possible where monitoring indicates elevated risk or adverse environmental effects. The numerical limits in the standard are also expected to be reviewed at five-to-ten-year intervals as more data and updated toxicology information become available.
Receiving environment monitoring	Receiving water and/or sediment monitoring may be required by consenting authorities through consent conditions, where relevant to the receiving environment and proposed control level.

5.3 When numerical limits would apply

Numerical metals limits would apply only where both discharge risk and receiving environment risk are high, for example, where higher-risk inputs or treatment processes combine with a more sensitive receiving environment, such as low-dilution freshwater or an estuary.

The limits would apply to dissolved metals because these are generally more bioavailable and more relevant to toxicity. Particulate-bound metals would continue to be managed through total suspended solids controls, and total phosphorus controls may also help where higher levels of treatment are required.

The proposed limits cover aluminium, arsenic, cadmium, chromium, copper, lead, mercury, nickel, and zinc, and would apply as an annual 90th percentile for medium and large plants and an annual 75th percentile for small plants. The limits are based on expected dilution in the receiving environment, rather than fixed background concentrations. This provides a simpler national approach that aligns with the first set of wastewater standards.

Copper and zinc limits for low and very low dilution freshwater and lakes have been moderated because the strictest derived values may be difficult or costly to achieve with existing treatment technology. In marine receiving environments, copper and zinc limits are based on full dilution, while other metals use near-field dilution.

Where elevated metals are found, source control, trade waste controls and investigation of upstream contributors are expected to be the first response before treatment plant upgrades are considered.

We welcome feedback about achievability of the proposals across all metals and environments, and particularly copper, zinc, chromium and potentially cadmium in low-dilution freshwater and lake settings.

The table below provides a high-level summary of the proposed numerical metals limits. The full proposed values and further context on their derivation are set out in **Appendix B**.

Table 12, high-level summary of proposed numerical metals limits

Receiving environment	What numerical limits would apply
Freshwater and lakes	Proposed dissolved metals limits for aluminium, arsenic, cadmium, chromium, copper, lead, mercury, nickel, and zinc.
Marine receiving environments	Proposed dissolved metals limits for aluminium, arsenic, cadmium, chromium, copper, lead, mercury, nickel, and zinc. In marine receiving environments, copper and zinc limits are based on full dilution, while other metals use near-field dilution.

5.4 Implementation through resource consents

For a new or renewed resource consent, the applicant would need to identify the discharge risk category, receiving environment risk category, proposed control level, metals, or surrogate indicators to be monitored, monitoring frequency, and any proposed review points. The consenting authority would implement the relevant requirements through consent conditions.

Where new trade waste, landfill leachate, tankered waste, significant stormwater inputs or metal-based treatment chemicals are introduced during the consent period, the risk classification may need to be reviewed. A change in risk classification may affect whether the plant remains at Level 1 or moves to Level 2 or Level 3 controls.

The proposed framework is intended to support national consistency while still allowing councils to respond to site-specific evidence. In particular, the 10-year review for Level 2 monitoring does not prevent earlier action if monitoring shows elevated risk or adverse environmental effects.

5.5 Worked examples

Four worked examples have been provided in Table 13 below to illustrate how the pathways for the discharge of metals to water would apply. These examples show how the standards would apply based on the risk profile of each wastewater treatment plant.

Table 13, worked examples for the application of the discharge of metals to water standards.

Example	Likely risk profile	Likely requirements
A plant receiving mostly domestic wastewater, with no significant trade waste, no landfill leachate and discharge to a well-diluted receiving environment.	Lower discharge risk and lower receiving environment risk.	Use total suspended solids and total phosphorus, where relevant, as surrogate indicators. Information monitoring of treated wastewater would apply, but numerical metals limits and compliance monitoring would not apply.
A plant receiving significant trade waste or tankered waste but discharging to an open ocean or high-energy coastal receiving environment.	Higher discharge risk but lower receiving environment risk.	Surveillance monitoring for metals associated with the trade waste or tankered waste, with review of results over time. Numerical values may be used as investigation triggers rather than immediate compliance limits.
A plant using aluminium or iron-based treatment chemicals and discharging to a low-dilution freshwater environment.	Higher discharge risk and higher receiving environment risk.	Targeted monitoring for aluminium, iron where relevant, and other relevant metals would apply. Because both discharge risk and receiving environment risk are high, Level 3 controls would apply, including numerical limits and end-of-pipe compliance monitoring for the relevant metals.
A plant receiving significant industrial inputs and discharging to an estuary or depositional environment where site-specific information indicates a plausible accumulation pathway.	Higher discharge risk and higher receiving environment risk.	Because both discharge risk and receiving environment risk are high, Level 3 controls would apply, including numerical limits and end-of-pipe compliance monitoring. Receiving water and/or sediment monitoring may also be required by the consenting authority, with guideline values used as review triggers if monitoring indicates accumulation or increasing concentrations.

Current position: The Authority has developed a proposed pathway for classifying and applying a proportionate, risk-based approach to manage the discharge of metals to water.

We'd like your feedback

Question 10: Do you agree with using the proposed risk-based framework for metals?

Question 11: Do you agree with the proposed discharge risk triggers and receiving environment risk factors?

Question 12: Do you agree with the proposed metals control levels?

Question 13: Do you agree with the monitoring proposals for discharge of metals to water?

Question 14: Do you agree with the proposed numerical limits and when they would apply?

Question 15: Is there anything important missing from the proposed discharge of metals to water standard, or areas that need further testing before final decisions are made?

6. Next steps after consultation

Feedback from consultation will be vital to determine next steps

The draft proposals outlined in this document are intended to provide a foundation for iterative improvements and refinement. The Authority is focused on ensuring that any proposals that are progressed are responding to a well-defined problem, and that the most appropriate option is being taken forward.

Evidence provided during submissions will help to identify the scale of the issues, evaluate the case for change, and help to understand appropriate mechanisms for assessing risk and implementing solutions for odour and metals. After consultation closes, the Authority will review submissions and identify any further testing needed to refine the proposed standards. The proposals are likely to change before final decisions are made.

A final proposal will be developed for the Minister of Local Government's consideration. If agreed, the wastewater standards will be set through regulations made by Order in Council. The regulations are currently expected to come into force in July 2027, subject to Ministerial and Cabinet decisions.

For further information regarding these proposals, please contact wastewater_stormwater@taumataarowai.govt.nz

Appendix A: Activities and matters excluded from the proposed discharge to air standard

The proposed discharge to air standard is focused on odour from municipal wastewater treatment plants. It would not apply to the activities or matters listed below.

Table A1, excluded activities from the proposed discharge to air standard.

Excluded activity or matter	How it would be managed instead
Sewer networks	Discharges to air from sewer networks, including pump stations and pipelines, would not be covered by this proposed standard.
Industrial and non-municipal wastewater treatment plants	Discharges to air from industrial and non-municipal wastewater treatment plants would continue to be managed through existing regulatory and consent processes.
Disposal of biosolids or treated wastewater	Discharges to air from the disposal of biosolids or treated wastewater to land, and from the disposal of treated wastewater to water, would not be covered by this proposed standard.
Combustion-related contaminants	Combustion-related contaminants from auxiliary sources, including generators, thermal dryers, combined heat and power units, incinerators, and biogas flares, would continue to be managed through existing regulatory mechanisms and consent processes.
Greenhouse gases	Discharges to air of greenhouse gases would not be covered by this proposed standard.
Unplanned emergency releases	Discharges to air from unplanned emergency release scenarios would not be covered by this proposed standard.
Dust from biosolids handling	Discharge of dust, or particulate matter, from biosolids handling would not be covered by this proposed standard. Feedback is sought separately on whether dust effects should be addressed through the minimum performance requirements.
Health-related air contaminants	Discharges of volatile organic compounds, ammonia, hydrogen sulphide, and bioaerosols from a health effects perspective would not be covered by this proposed standard.

Appendix B: Proposed numerical limits for metals

This appendix sets out the full proposed numerical limits for metals. The limits are adapted from technical advice and would apply only where Level 3 controls are required — where both discharge risk and receiving environment risk are high.

The limits apply to dissolved metals and would be assessed as an annual 90th percentile for medium and large wastewater treatment plants, and an annual 75th percentile for small wastewater treatment plants.

The values are based on expected dilution in the receiving environment. Copper and zinc values for low and very low dilution freshwater and lakes have been moderated because the strictest derived values may be difficult or costly to achieve with existing treatment technology. Marine arsenic limits are proposed as shown in Table B2.

Table B1, proposed numerical limits for freshwater and lakes.

Receiving environment category	Aluminium	Arsenic	Cadmium	Chromium	Copper	Lead	Mercury	Nickel	Zinc
Freshwater – high dilution	6.875	1.625	0.015	0.125	0.0588	0.25	0.075	1.375	0.5125
Freshwater – moderate dilution	1.375	0.325	0.003	0.025	0.0118	0.05	0.015	0.275	0.1025
Freshwater – low dilution	0.275	0.065	0.0006	0.005	0.0118	0.01	0.003	0.055	0.1025
Freshwater – very low dilution	0.1375	0.0325	0.0003	0.0025	0.0118	0.005	0.0015	0.0275	0.1025
Lakes	1.1	0.26	0.003	0.02	0.0118	0.05	0.012	0.22	0.1025

Table B2, proposed numerical limits for marine receiving environments.

Receiving environment category	Aluminium	Arsenic	Cadmium	Chromium	Copper	Lead	Mercury	Nickel	Zinc
Estuaries and harbours	0.740	–	0.035	0.0880	0.03	0.0880	0.0080	0.1180	0.4
Low-energy coastal	0.740	–	0.07	0.0880	0.06	0.0880	0.0080	0.1180	0.8
High-energy coastal	0.740	–	0.1100	0.0880	0.12	0.0880	0.0080	0.1180	1.6
Open ocean	3.700	–	0.5500	0.4400	0.6	0.4400	0.0400	0.5900	8

Note on units and marine arsenic

All values are in mg/L and apply to dissolved metals. Marine arsenic limits are proposed as 0 mg/L for each marine receiving environment category shown in Table A2. The proposed limits would be tested through consultation and may change before final decisions are made.

Appendix C: Full list of consultation questions

Full set of questions – discharge to air	Have I shared my thoughts on this?
Question 1: Do you agree that a national standard should be developed for discharges to air from wastewater treatment plants focusing on odour management?	
Question 2: Do you agree with using the proposed management-based framework for odour?	
Question 3: Do you agree with the proposed odour risk categories, thresholds, and definitions?	
Question 4: Do you agree with the proposed odour management plan levels and requirements?	
Question 5: Do you agree with the proposed minimum performance requirements for all treatment plants?	
Question 6: Do you agree with the proposed odour improvement plan triggers and the review requirement?	
Question 7: Is there anything important missing from the proposed discharge to air standard to support effective odour management at wastewater treatment plants?	
Question 8: Do you agree with the focus on odour for the proposed discharge to air standard, or are there other aspects of discharge to air that should be considered, for example dust generated by treatment processes?	

Full set of questions – discharge of metals to water	Have I shared my thoughts on this?
Question 9: Do you agree that a national standard should be developed for discharge of metals in treated wastewater to water receiving environments?	
Question 10: Do you agree with using the proposed risk-based framework for metals?	
Question 11: Do you agree with the proposed discharge risk triggers and receiving environment risk factors?	
Question 12: Do you agree with the proposed metals control levels?	
Question 13: Do you agree with the monitoring proposals for discharge of metals to water?	
Question 14: Do you agree with the proposed numerical limits and when they would apply?	
Question 15: Is there anything important missing from the proposed discharge of metals to water standard, or areas that need further testing before final decisions are made?	

Full set of questions – implementation	Have I shared my thoughts on this?
Question 16: Are there any barriers for you to implement wastewater standards or additional opportunities to streamline resource consent applications for wastewater treatment plants?	
Question 17: Are there any technical matters in the existing wastewater standards that could affect implementation of the two proposed standards for odour and metals discharged to water?	

DCC SUBMISSION ON THE ILLUSTRATIVE NATIONAL POLICY DIRECTION (NPD)

Department: City Development and Mana Ruruku

EXECUTIVE SUMMARY

1 This report seeks retrospective approval of a Dunedin City Council (DCC) submission to the Ministry for Cities, Environment, Regions and Transport (MCERT) on the Illustrative National Policy Direction (NPD), which will become a key component in the country's new planning system. The DCC submission is attached as Attachment A.

2 The DCC submission provides feedback on both the structure of the illustrative NPD as well as on several of the key themes addressed within it.

3 The draft DCC submission was circulated to Councillors on 29 September to provide an opportunity for comments and early feedback. No amendments were requested, and the submission remains unchanged from the draft previously circulated.

4 Approval of the submission was originally scheduled to be considered by Council at its meeting on 12 October 2026. As that meeting was cancelled, staff lodged the submission before the consultation period closed on 16 October 2026 to ensure the Council's views were provided to MCERT. Retrospective approval of the submission is therefore now sought. Responsibility for considering and approving the submission retrospectively has also transferred from Council to the Planning and Policy Committee.

5 Should the Committee wish to make amendments to the submission, staff can revise and resubmit it to MCERT as an amended version.

RECOMMENDATIONS

That the Committee:

Approves retrospectively the Dunedin City Council submission, with any amendments, on the illustrative National Policy Direction (NPD).

BACKGROUND

6 The Ministry for Cities, Environment, Regions and Transport has released an illustrative National Policy Direction (NPD) as part of the ongoing reform of New Zealand's planning system.

7 The document explains the new planning system is designed to work like a funnel with National Policy Direction at the top providing clear direction for the rest of the system, narrowing the scope for debate and litigation at each layer. The role of the NPD is to translate the goals of the legislation into more specific national priorities and directives in a single document. The final NPD will guide the preparation of the regional spatial plan for Otago and Dunedin's next land use plan and the natural environment plan for the region.

8 The illustrative NPD has been developed to support discussion and testing of the proposed approach before formal statutory consultation on the proposed NPD occurs. Feedback on the illustrative NPD will inform development of the proposed NPD.

9 The illustrative NPD is structured around a series of key themes intended to reflect the Government's key priorities for the new planning system. These themes are:

a) Housing and Development

b) Infrastructure

c) Primary production and the rural economy

d) Resources – quarrying, mining and waste

e) Public values.

There are also two sections that cover: cross-cutting directives that cover a range of matters including private property rights and economic growth that apply across all themes in the NPD and system-wide directives that include Māori interests and natural hazards. Under each theme are sub-themes that include policy intent statements and directives that primarily include policy direction or other requirements for the content that must be included in regional spatial plans, land use plans and natural environment plans. The document also includes information about the types of national standards that are proposed to support the system (which does not form part of the NPD).

10 The Government has indicated it is particularly interested in feedback on:

a) whether the thematic structure is clear and easy to understand

b) whether the illustrative NPD helps provide a clear picture of how National Policy Direction could work in practice

c) any important priorities, gaps or trade-offs that are not adequately reflected

d) how the NPD could be made more useful and effective.

11 In response, DCC has prepared a submission addressing these questions including more detailed feedback on how the NPD currently addresses the following matters:

a) Infrastructure affordability

b) Growth

c) Approach to natural hazard risk and management

d) Issues related to mana whenua and Māori.

12 Approval of the submission was originally scheduled to be considered by Council at its meeting on 12 October 2026. As that meeting was cancelled, staff lodged the submission before the consultation period closed on 16 October 2026, to ensure the Council's views could be provided to MCERT. As a result, retrospective approval of the submission is now required. Consideration

and retrospective approval of the submission have also moved from Council to the Planning and Policy Committee.

DISCUSSION

13 The submission supports consolidating national planning direction into a single document. It also supports greater use of national standards, which has the potential to improve certainty, consistency and efficiency across the planning system and to reduce the risk of litigation.

14 However, the submission is concerned that the illustrative NPD reflects current Government priorities rather than providing an enduring framework. As the NPD will sit at the apex of the new planning system, significant amendments with each electoral cycle could require substantial rework of plans while they are still being prepared. This would increase costs for ratepayers and reduce certainty for investment. The submission reiterates DCC's view that the resource management system should be evidence-based and encourages cross-party support on key matters.

15 The submission also raises concerns about the structure and regulatory effectiveness of the illustrative NPD. It does not support a separate set of cross-cutting directives, as these could be read as having primacy over other parts of the document. Instead, it recommends integrating these matters into a more comprehensive set of themes. More significantly, the illustrative NPD does not provide sufficient direction on how conflicts and trade-offs between competing directives are to be resolved, as required by the Planning Act. The submission recommends introducing clear NPD-wide principles for resolving these conflicts.

16 The submission provides more detailed feedback on four priority topics: growth, infrastructure affordability, natural hazard risk and management, and matters relating to mana whenua and Māori.

a) On growth, the submission supports providing sufficient development capacity and maintaining competitive urban land markets. However, it is concerned that requirements for an "abundance" of development opportunities and for non-contiguous urban expansion could promote dispersed or unplanned growth. That growth could occur without sufficient regard to sequencing, infrastructure provision and long-term costs. The submission recommends avoiding untested terms such as "abundance" and clarifying the relevant directives.

b) On infrastructure affordability, the submission considers that the illustrative NPD does not adequately recognise the long-term financial and operational implications of growth and development decisions. It recommends that growth be prioritised in areas where infrastructure can be provided efficiently and affordably over the short and long term. It also seeks clearer direction on how affordability is to be considered when assessing rezoning requests and private plan changes.

c) On natural hazards, the submission supports avoiding housing and development in areas of very high risk, but seeks clearer direction on managing areas subject to high or other significant risk. It also recommends that the NPD address situations where activities such as infrastructure, primary production and quarrying may create, transfer or exacerbate hazard risk. Finally, it seeks a clearer connection between natural hazard management, climate adaptation and long-term infrastructure planning.

d) On matters relating to mana whenua and Māori, the submission supports directives providing for papakāika and protecting sites of significance to Māori. However, it seeks that engagement occurs at a local level with marae, hapū and rūnaka. It also considers that Māori interests have been defined too narrowly, as being limited to Māori land and sites of significance. In addition, it recommends that sites of significance to Māori be included in the direction on managing conflicts between infrastructure and significant values.

17 The submission notes that it is difficult to fully assess the workability of the illustrative NPD without the supporting national standards, which will define many key terms, methodologies and requirements. It recommends that indicative content for national standards be released alongside formal consultation on the NPD. It also recommends that the "policy intent" sections, which have no clear status under the Planning Act, be recast as objectives. This would clarify their relationship with the directives and reduce the risk of litigation.

18 Finally, the submission makes recommendations to improve consistency of style and language. These include ensuring that directives clearly identify:

a) who is responsible for implementation;

b) which planning instrument they apply to; and

c) whether they direct plan content, preparation or implementation.

19 The submission also seeks clearer differentiation between matters to be implemented nationally through standardised plan content and those requiring decisions by local authorities.

OPTIONS

Option One – Recommended Option – Retrospectively approve the DCC's submission on the illustrative National Policy Direction (NPD)

20 The Committee approves the Dunedin City Council submission retrospectively, with any amendments. Should the Committee request amendments, staff will revise the submission and resubmit it to MCERT as an amended version.

Advantages

- Enables DCC to provide feedback on the illustrative NPD that will improve the effectiveness and workability of the NPD once released.

Disadvantages

- There are no identified disadvantages to this option

Option Two – Do not retrospectively approve the DCC's submission on the illustrative National Policy Direction (NPD)

21 The Committee does not retrospectively approve the Dunedin City Council submission on the illustrative National Policy Direction (NPD). Should the Committee choose this option, staff will contact MCERT to withdraw the submission.

Advantages

- There are no identified advantages to this option.

Disadvantages

- The Council loses the opportunity to provide feedback on the illustrative NPD.

NEXT STEPS

22 If there are any requested amendments to the submission these will be incorporated, and the submission will be resubmitted to MCERT as an amended version. If Council does not approve the submission MCERT will be contacted and the submission will be withdrawn.

Signatories

Author:	Dr Anna Johnson - Principal Advisor Strategy, Systems and Reform Bede Morrissey - Senior Planner Jesse Matheson - Kaitātari Māori | Policy Analyst Māori
Authoriser:	Mike Costelloe - General Manager, Arts, Culture & Economic Development

Attachments

	Title	Page
⇩A	Submission on the Illustrative National Policy Direction (NPD)	97

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	✓	☐	☐
Economic Development Strategy	✓	☐	☐
Environment Strategy	✓	☐	☐
Arts and Culture Strategy	☐	☐	✓
3 Waters Strategy	✓	☐	☐
Future Development Strategy	✓	☐	☐
Integrated Transport Strategy	✓	☐	☐
Parks and Recreation Strategy	✓	☐	☐
Other strategic projects/policies/plans	☐	☐	✓

The decision relates to approving a submission on the illustrative NPD and does not directly implement or amend any Council strategies. However, the final NPD itself will likely have impact on a number of Council strategies, plans, policies in the future.

Māori Impact Statement

The DCC's submission includes a section on the impacts to mana whenua Māori. This has been drafted by staff from Mana Ruruku (Māori Partnerships team).

Sustainability

There are no direct implications for sustainability from this submission. However, the NPD itself will likely have implications for sustainability and emissions.

LTP/Annual Plan / Financial Strategy /Infrastructure Strategy

There are no direct implications to the LTP / Annual Plan / Financial Strategy or Infrastructure Strategy from this submission. However, the NPD itself is likely to have significant ramifications for these documents.

Financial considerations

There are no financial implications from this submission directly. However, the NPD itself may have significant financial implications.

Significance

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

Engagement – external

There has been no external engagement.

Engagement - internal

The submission has been prepared by the DCC's Principal Advisor – Strategy, Systems, and Reform, along with staff from City Development and Mana Ruruku. Feedback from the Climate Adaptation team have been included.

SUMMARY OF CONSIDERATIONS
Risks: Legal / Health and Safety etc. There are no identified risks.
Conflict of Interest There is no conflict of interest.
Community Boards There are no specific implications identified for Community Boards.

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16 October 2026

Ministry for Cities, Environment, Regions and Transport (MCERT)
Wellington

Tēnā koutou

FEEDBACK ON THE ILLUSTRATIVE NATIONAL POLICY DIRECTION (NPD)

The Dunedin City Council (DCC) welcomes the opportunity to provide feedback on the illustrative National Policy Direction (NPD), which would form part of the country's new planning system.

The DCC acknowledges that the illustrative NPD does not necessarily represent final Government policy or direction. However, it appears likely to still provide a reasonable indication of the direction and approach that may be reflected in the proposed NPD when it is released for official consultation in 2027. On that basis, the DCC has provided feedback on both the overall structure and implementation of the illustrative NPD, as well as feedback on the individual directives it contains. The DCC recognises that these directives may change as the NPD continues to be developed, and it is hoped that this feedback will assist in refining both the overall framework of the NPD and the content of the directives themselves.

DCC's feedback on the illustrative NPD is structured as follows:

- Whether the thematic structure is clear and easy to understand
- Whether the illustrative NPD achieves its regulatory purpose
- Whether the illustrative NPD helps provide a clear picture of how National Policy Direction could work in practice
- How the NPD could be made more useful and effective. As part of this, DCC has chosen to focus on four priority themes relating to affordability, growth, the approach to natural hazard risk / management, and mana whenua and Māori.

In order to meet the timeframe for feedback, DCC notes that this submission has not yet been approved by Council. This feedback will be considered by the Council's Policy and Planning Committee at its next meeting on 22 October. If the Committee requests any changes or amendments, a revised version will be provided to MCERT following consideration by the Committee.

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Whether the thematic structure is clear and easy to understand

The DCC supports bringing the full range of national policy direction together into a single document as has been done with the NPD. Organising the direction into themes, supported by cross-cutting and system-wide directives, provides a useful starting point for the new planning system and should make the national direction easier to navigate and understand as a whole.

However, further consideration is needed regarding the structure, particularly the role and function of cross-cutting and system wide directives.

DCC does not support the Natural Hazards and Māori interests as representing the only system-wide themes. There are many interfaces between the goals and the directives that are required below them and in a sense all of the themes are system-wide. DCC also does not support the cross-cutting themes as a section. Placing these matters as cross-cutting themes could be read as giving these goals and direction primacy over other parts of the document, and this is of particular concern with respect to some of the matters discussed below related to planning for growth and infrastructure delivery.

DCC would prefer that these matters are integrated into a comprehensive set of themes that includes more comprehensive coverage of anticipated policy outcomes (objectives) across each domain of the natural environment, and clarifies the roles and relationships between land use plans and natural environment plans in achieving those outcomes, as well as the relationship between those outcomes and activity-specific outcomes sought elsewhere in the national policy direction (e.g. direction to help resolve conflicts).

DCC also recommends that an index is provided that lists matters related to the content of each planning instrument and to matters that are outside of that.

Whether the illustrative NPD achieves its regulatory purpose

Clause 47 of the Planning Act outlines the purpose of national policy direction which is to:

(a) particularise all the goals; and
(b) direct how the goals are to be achieved, including by identifying and providing for the resolution of conflict as far as is practicable.

Firstly, in terms of whether the illustrative NPD has adequate scope and coverage to meet the requirement of particularising the goals of the Planning Act, DCC

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acknowledges Table 1 of the illustrative NPD, which outlines how the various goals of the Planning Act are particularised through the different NPD themes.

However, in practice, the illustrative NPD appears to place emphasis on the current Government's priorities rather than present an enduring and comprehensive framework for resource management for Spatial Plans, Land Use Plans and Natural Environment Plans.

The NPD will sit at the apex of the planning framework and will guide the preparation of key planning instruments under the new system. Consequently, instability in the NPD would have far-reaching implications for councils, communities, infrastructure providers and resource users.

The current version of the iNPD reflects the current government's political priorities. This creates a risk that changes in political direction could lead to significant amendments to the NPD every electoral cycle. Such changes could occur while councils are still preparing the first generation of plans under the new legislation, requiring substantial rework and increasing costs for ratepayers and the wider planning system.

Durability is also important for market confidence, infrastructure planning, and public and private investment certainty. Councils, communities, infrastructure providers, landowners and developers need reasonable confidence that the planning framework will remain stable long enough to support implementation of first-generation planning instruments and associated investment decisions.

Consideration needs to be given to whether it is appropriate for national policy direction for resource management planning to be transformed into a politicised document. DCC repeats its concerns as expressed in its submission on the Planning Bill that the resource management system should be evidence-based to ensure stability and an enduring system. We also encourage cross-party collaboration on key matters designed with bipartisan support to help achieve stability and an enduring system.

Secondly, in terms of whether it identifies and provides for the resolution of conflict as far as practicable, DCC is of the view that the illustrative NPD lacks clear direction for resolving conflicts between competing outcomes.

An example of the NPD not adequately resolving conflicts is the directive on "Indigenous biodiversity and urban growth and infrastructure" (page 71). While the directive recognises that conflicts may arise between indigenous biodiversity protection, housing, and infrastructure, it then refers the management of these conflicts back to the housing and infrastructure themes. However, the housing theme

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does not address how significant indigenous biodiversity should be balanced against directives requiring an "abundance of areas for urban development" and "abundant development opportunities" (HD-Directive 1.1).

A further example is CC-Directive 1, which seeks to provide for private property rights, with restrictions only imposed when necessary to ensure others are not unreasonably affected or to provide for important public values. However, it is not clear in the NPD how the trade-off between providing for private property rights is to be reconciled with providing for infrastructure that may directly impact private property (e.g. a cell phone or electricity tower that may prevent the use of land for other purposes).

Another example is INFR-Directive 1.5, which only signals future national standards to help resolve conflicts between infrastructure and significant natural environmental values and significant historic heritage, rather than provide guidance on that resolution as required by the legislation.

This lack of guidance around how trade-offs are to be managed gives little signal of what is to be expected in lower order national standards and, if not further clarified through national standards, could lead to litigation on matters where it is considered there is a gap in those national standards and the NPD is brought into litigation.

Recommendations

It is recommended that:

- Introduce clear NPD-wide principles for resolving conflicts and assessing trade-offs between competing directives, and ensure and that this guidance is designed to be enduring because it has looked beyond short term government priorities and issues (a perceived shortage of land supply to meet demand).
- in order to achieve the goal of protecting significant indigenous biodiversity, there needs to be a clear signal to avoid or stringently manage adverse effects in areas of significant indigenous biodiversity, and that when new urban or rural residential development is to be enabled adjacent to these areas, opportunities to enhance these values through buffer planting areas, pest control and fencing are encouraged.

Whether the illustrative NPD helps provide a clear picture of how National Policy Direction could work in practice

The need to understand how the NPD and national standards will work together

It is difficult to fully assess the clarity and workability of the thematic structure without the supporting national standards. A substantial amount of detail is to be provided

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through these national standards, including how key terms, methodologies and requirements will be defined and applied. The national standards will therefore be critical to understanding how the NPD would operate and be implemented in practice, and how much discretion would remain for local decision-making.

Recommendations

It would be helpful for the formal submission stage if greater detail on indicative critical content for national standards could be provided at the same time to allow that flow-through to be understood and submitted on. This would help make submissions on the national direction as helpful as possible and provide helpful information for the further development of the national standards.

The lack of clarity in the policy intent section

The role and status of the policy intent sections is not clear. It is also uncertain what part they play in directing lower order instruments – do the lower order instruments need to implement these parts of the national direction directly or are they only explanatory statements that frame the directives? It should be clearer that this content is part of the national direction that must be implemented by lower order instruments so that, if there are gaps in the directives or interpretation challenges with the directives, this intent can be considered and implemented.

Recommendations

Rather than an unknown concept of "policy intent" which is not listed as a provision of key instruments in Section 29 of the Planning Act, consideration should be given to reframing these as objectives so that their relationship with the directives and national standards is better understood and the risk of costly litigation around a new and untested concept that is not reflected in the legislation is avoided.

It is noted that objectives are anticipated in national policy direction in Section 48 (2)(b) of the Planning Act. If this content is recast as outcome-based objectives and consistently written as clear desired high level (and connected) outcome statements, this content could then create a clearer framework for objectives and policies in lower level instruments to implement.

The need to ensure content is consistent in its style and language

The Illustrative National Direction includes style variability which most likely reflects its early developmental stage and the number of authors that have been involved in drafting it rather than purposeful variability. DCC wishes to provide some specific recommendations to help address this issue, as outlined below.

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Recommendations

It is recommended that:

1. The directives are written as procedural or substantive policies to be implemented in specific lower-level instruments or in how those instruments are developed or implemented, and that these follow a consistent style guide to reduce the risk of interpretation disputes.
2. The wording that directs the content of lower instruments that is usually given as land use plans, regional spatial plans, and natural environment plans "must" consistently use that terminology and remove any variation.
3. That the national policy direction explicitly explains that much, if not most, of the direction that references planning instruments will in fact be implemented by the Government first through national planning standards and standardised plan content (they are the first implementers of that direction) so that councils don't face challenges that in exercising their role they have failed to do something that is actually a challenge to that national direction. One way that this has been done is in PP-Directive 2.1 which says "land use plans and natural environment plans [in accordance with national standards]". This approach could be used more broadly.
4. That the directives do not include outcome statements in their chapeaus that do not reflect the same content in the policy intent (which is recommended to be changed to be objectives) and that these chapeaus are consistently worded as "To (outcome statement).
5. The wording that directs other actions by local authorities consistently use the "Council must" or "Council may" as appropriate.
6. Clearly distinguish between requirements that are to be implemented through national planning standards and mandatory standardised plan content (i.e. something that central government must implement), and requirements that are intended to be developed and implemented by local authorities through bespoke plan provisions.
7. Review all directives to ensure they clearly identify whether they apply to land, the coastal marine area, or both, particularly where regional spatial plans are intended to cover areas both above and below mean high water springs (MHWS).

Matters which are supported

This submission has focused primarily on identifying issues, uncertainties and areas requiring clarification in the illustrative NPD. While reviewing the document, we also

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identified several aspects that we support, although this was not the main focus of our assessment.

In particular, DCC supports the proposed use of nationally consistent standards, including those for managing reverse sensitivity, clarifying anticipated land uses within zones, providing a framework for regulatory relief, and identifying public values such as significant biodiversity, outstanding natural landscapes, and historic heritage. Nationally consistent standards should improve certainty for councils, communities, and plan users, reduce litigation, and support more consistent plan provisions and management approaches across the country.

How the NPD could be made more useful and effective

The DCC has identified four priority areas where it believes the NPD needs further work.

Theme 1: Infrastructure Affordability

The DCC considers that the concept of infrastructure affordability is a significant gap within the illustrative NPD as currently written. While the illustrative NPD contains other directives that reference the efficient provision of infrastructure, including with respect to having enabling rules for new infrastructure (INFR-Directive 1.2), sequencing growth, change and investment to support efficient public investment (CC-Directive 6), and prioritising growth in locations where infrastructure can efficiently support growth and change (CC-Directive 5), there is no explicit recognition of infrastructure affordability, including the long-term financial implications of growth and development decisions on service delivery costs to ratepayers.

The only potential catch-all that covers this matter is in CC-Directive 7 which requires spatial plans to seek to ‘avoid unnecessary long-term costs to communities and the public’. The wording of this directive is not clear; for example, what types of costs are intended to be considered, or how "unnecessary" costs should be assessed. If this directive is intended to cover financial affordability, this should be clarified.

The risk, if this is not done, is that councils will face substantial pressure to provide for growth in locations where infrastructure can technically be delivered by a developer, for example through site-level 3 waters servicing, but these small site level schemes would result in long-term infrastructure affordability issues due to higher ongoing maintenance costs, or preclusion of growth through expansion of reticulated networks in a planned way leading to inefficient financing or operation of future infrastructure networks. This also has implications for the timing of infrastructure delivery for planned growth and other strategic priorities that support economic development and change.

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A related matter is the direction with respect to providing for growth which is discussed in more detail below which also does not give clear enough direction about the consideration of infrastructure affordability when considering options for growth either at the plan development stage or in response to submissions requesting rezoning.

Recommendations:

It is recommended that the NPD:

1. Amend CC-Directive 5 (a) to read Regional spatial plans must prioritise growth and change in areas (a) where there is infrastructure capacity or infrastructure can be efficiently provided ~~support growth and change~~ and (aa) where infrastructure can be delivered in a way that is operationally efficient and affordable to the community over the short and long term.
2. Develop clear direction around considering infrastructure operational efficiency and affordability as part of Land Use Plans and, if possible, in a way that specifically speaks to how these matters need to be considered when considering private plan changes and submissions that seek rezoning as part of land use plan development (where this is not planned growth identified in Spatial Plans). Or if this direction is to be included in national planning standards – make clear reference to this in the indicative implementation through national standards.

Theme 2: Growth

There appears to be an internal conflict in the NPD between directions that discuss loosely worded new concepts such as spatial plans must identify “an abundance of areas for urban development”(HD-Directive 1.1(a)), land use plans must “enable abundant development opportunities”(HD-Directive 1.1(b)), must enable non-contiguous urban expansion (HD-Directive 1.5) compared with other directions related to fixed goals around growth “development capacity and intensification requirements” (HD Directive 1.6) and “framework for determining whether an urban land market is competitive” (HD-Directive 1.2).

The DCC supports direction which ensures that spatial plans and land use plans have adequate land supply and/or enabling provisions that will provide for intensification and that this capacity must be enough to achieve a competitive land market. However, it does not support direction that promotes unplanned and unmanaged growth everywhere that will lead to significant increases to communities to service growth. The reality is growth will never fully pay for growth – as it is very difficult to account for the impact of growth on wider network infrastructure and the need for changes to

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community or public transportation services and the timeframe for payback of upfront upgrade costs to infrastructure that must be delivered by councils may not be adequate to cover the costs of borrowing. The risk is that you encourage a situation where you have very low rates of growth across many dispersed outlying growth areas where land is cheap (that may in Dunedin sit across a range of outlying townships and settlements and the wider rural environment that is in commutable distance to the centre of Dunedin), with each area needing to address new or upgraded community and recreation facilities, upgrades to the transportation network, expectations for new or improved public transportation services, new 3 waters infrastructure, new transportation infrastructure (footpaths, intersection upgrades), new electricity and communications infrastructure. This is costly for ratepayers, increases costs to Government, and ultimately will not deliverable 'affordable' housing if you consider these additional costs.

In addition, DCC is concerned with some of the content of the policy intent for sub-theme 1: competitive urban land markets particularly where it says the intent is "new land supply isn't sequenced or drip-fed into the market and land use rules are as permissible as possible". Sequencing growth is an important way that infrastructure delivery can be planned and in fact it seems to be anticipated as the indicative implementation through national standards talks about direction on "how to provide for resequencing or rescaling of investment or priorities in response to significant changes in factors such as demographic change or demand". With respect to land supply being 'drip-fed', this is not something that councils do or have control over. Rather, this is something that is done by developers to maintain price points. If the Government wishes to prevent this practice, legislative changes that would empower councils to discourage this practice, for example through charging mechanisms, would be welcome. Finally, DCC considers that wording "land use rules are as permissible as possible" is too widely worded and goes far beyond the later direction which requires this permissibility to be consistent with the development outcomes sought for the location.

Recommendations:
It is recommended that:

1. The direction should clearly state the expectation of enough housing capacity and evidence of competitive land markets as what is required to give effect to 'abundant development opportunities" goal
2. Avoid the use of the word "abundance" in the policy directives as it is an untested concept that will likely lead to litigation

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3. Clarify HD-Directive 1.4 so that it does not have the effect of requiring temporary or future provisions to all land that cannot be demonstrated to be 'unsuitable' which in effect could be the vast majority of a district.
4. Clarify HD-Directive 1.5 so that it does not read that as developments do not need to be connected via infrastructure (roads and 3 waters) to existing urban areas. It could be misunderstood or argued to mean it prevents requirements for roading connectivity or connections to reticulated services.
5. It would be useful to add clear directives under the subtheme of competitive land market that require ensuring growth supports efficient and affordable long term infrastructure investment and operation.
6. Remove or amend the statement in the first paragraph of the policy intent for subtheme 1: competitive urban land markets to:
    a. Remove reference to preventing sequencing of growth
    b. Remove the reference to land supply being drip fed as not something in the control of councils
    c. Remove or amend the statement about being as permissible as possible to align with the wording in HD-Directive 1.3

Theme 3: Approach to natural hazard risk / management

The DCC supports the direction in HD-Directive 4.1, which establishes a clear threshold that housing and development is to be avoided in areas where risks are assessed as "very high".

However, the DCC is concerned that currently the directive provides no guidance on how areas subject to "high" or other significant risk levels should be managed. This lack of guidance could be interpreted as housing and development in an area with "high" risk is acceptable, especially when read alongside other directives in the illustrative NPD that strongly support development capacity, urban expansion, and housing growth. There is a risk that development could be directed towards locations that are subject to unacceptable levels of natural hazard risk that present not just risks to people and assets, but also increased fiscal pressure on councils to reduce risks through natural hazard mitigation infrastructure or fund future adaptation for expanded or new urban or settlement areas in high risk areas where risk will increase over time due to climate change.

DCC considers the NPD should provide clear direction on how risks below the "very high" threshold should be assessed and managed, including where new development may need to provide mitigation to reduce risk to an acceptable level or how to protect

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local authorities from future claims due to property loss or requests for hazard mitigation or adaptation infrastructure.

A second concern relates to the way several directives address natural hazard risk to an activity, rather than the risks that the activity itself may create, transfer, or exacerbate. For example, INFR-Directive 3.1 looks to recognise that infrastructure resilience is achieved through asset management, design, and investment planning, and therefore infrastructure should not be restricted because of the effects of natural hazard risk to the infrastructure. While this may address the risk to the infrastructure itself, it does not address situations where infrastructure may itself increase a natural hazard risk elsewhere (e.g. flood protection works can reduce flood risk in one location, but transfer the risk somewhere else, earthworks associated with infrastructure can exacerbate risk elsewhere), or increase the number of people exposed to a hazard risk (e.g. critical servicing infrastructure that is located in an area of higher risk).

A similar concern exists with PP-Directive 5.1, which relates to primary production. In some cases, activities might be enabled in hazard-prone areas without sufficient consideration of potential off-site effects (e.g. if hazardous substances associated with primary production were stored in a flood-prone area, then a flooding event could result in contamination of water or land that poses a human health risk).

Other directives, such as RW-Directive 4.1, which broadly enables quarrying, mining, and waste management activities in hazard-prone areas without an upper risk threshold, may be "over-enabling", and allow such activities to occur in locations where the risk is simply unable to be adequately mitigated (e.g. in areas of "very high" natural hazard risk). While some activities may have legitimate operational reasons for locating in hazard-prone areas, the directive could allow activities to occur in locations where risks are incapable of being reduced to an acceptable level. The directive should be amended to prevent this occurrence. DCC also notes that the approach taken through RW-Directive 4.1 differs from the approach taken in HD-Directive 4.1, which requires that housing and development are avoided in areas where risks are assessed as "very high".

While the DCC supports the recognition of climate-related natural hazards and long-term risk profiles in SW-Directives 2.1 and 2.5, DCC would like to see the relationship between natural hazard risk management and long-term climate adaptation made clearer. SW-Directive 2.1 directs regional spatial plans to identify housing growth, infrastructure, and investment towards areas where natural hazard risks can be avoided or mitigated. However, other directives such as INFR-Directive 3.1, could be interpreted as supporting infrastructure and investment in locations that may become

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increasingly vulnerable over time, as this directive seeks to recognise that infrastructure resilience is achieved through asset management, design, and investment planning, rather than avoiding areas exposed to natural hazard risk. This approach may become problematic where climate change is expected to increase the severity or frequency of hazards over time, such as sea level rise, coastal erosion, flooding, or inundation. In these circumstances, it is unclear how future climate projections, adaptation planning, or the long-term viability of infrastructure should be taken into account when applying the directive. Long-term reliance on infrastructure assets located in hazard-prone areas (e.g. flood protection infrastructure) can result in ongoing and increased maintenance and/or replacement costs for these assets, and potentially reduce the range of future adaptation options available to communities. Without clearer direction, councils may face difficulties consistently incorporating climate modelling and adaptation planning into planning instruments and infrastructure investment decisions. It is also important that the policy direction and associated national standards ensure that infrastructure and development are located, designed, and managed in a way that enables them to continue functioning safely and effectively as climate-related hazards increase over time. It is noted that the NPD definition of infrastructure includes activities such as 'a relevant school or an institution' and 'an early childhood education and care centre' associated with a relevant school or institute, as defined in section 10 of the Education and Training Act 2020, emergency service facilities, and health facilities operated by Health NZ. DCC questions whether these types of activities should be enabled in hazard prone areas.

Finally, DCC notes that INFR-Directive 1.7 (specifically clause (b)(iv)) promotes the co-location of compatible infrastructure but does not appear to recognise situations where co-location may reduce resilience. While co-location can improve efficiency and reduce environmental effects, concentrating multiple infrastructure assets within a single location can increase vulnerability where a hazard event can affect multiple services simultaneously. DCC considers the directive should acknowledge that co-location may not always be the most resilient option and should allow exceptions where it would increase risk or reduce resilience.

Recommendations:
It is recommended that:

- HD-Directive 4.1 be amended to clarify how natural hazard risks associated with housing and development should be managed where risks are high or medium as well as very high (as assessed using the risk matrix). This would include outlining appropriate planning responses for each level that would clarify when

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mitigation would be sufficient to enable development, and when development should be restricted or avoided.

- Clarify that INFR-Directive 3.1, PP-Directive 5.1 and RW-Directive 4.1only apply to risks from natural hazards to the infrastructure itself, and do not preclude managing the effects of the activities where the activity may create, transfer, increase, or exacerbate natural hazard risk to other people, property, infrastructure, or the environment.
- Amend RW-Directive 4.1 to require quarrying, mining, and waste management activities to avoid areas of very high natural hazard risk unless the risk can be reduced to an acceptable level (as opposed to as far as is reasonably practicable).
- Provide clearer direction on how natural hazard management and long-term climate adaptation planning are to be integrated, particularly in relation to infrastructure planning and investment decisions.
- National standards should require risk assessments to consider how climate-related hazard risks are expected to change over time (including over the anticipated life of proposed infrastructure assets). These risk assessments should account for uncertainty, residual risk, mitigation failure, and changing likelihood and consequences.
- Amend INFR-Directive 1.7 to recognise situations where co-location of infrastructure may increase risk or reduce resilience, and provide flexibility around this where appropriate.
- Reconsider whether sensitive activities such as early childhood education and health care facilities, should be enabled in hazard prone areas.

Theme 4: Issues relating to mana whenua and Māori

Within the illustrative NPD, issues relating to Māori have been considered within the system-wide Māori interests directive (i.e. having an impact across the whole document). However, aspects of each of the five themes also relate to mana whenua and Māori interests and values. Our feedback on issues relating to mana whenua and Māori is therefore provided in two parts:

- The five NPD themes, and
- The system-wide Māori interests directives.

Mana whenua content in the five themes:

DCC, in support of the needs and values of mana whenua and Māori, supports the following:

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- HD-Directive 2.1, requiring provision for papakāika, as this recognises the need for different housing types within different communities and allows for Māori to live on Māori land, integrating tikaka and kawa within these papakāika.
- INFR-Directive 2.1, transitioning to a low carbon economy. This recognises that high carbon emissions negatively impact the environment, whereas a low-carbon economy encourages mokopuna and future-focused thinking.
- PP-Directive 2.4, allowing identified Māori Land to be used for papakāika development, and other development that is in line with the environmental, social, cultural, and economic needs of the owners, their whānau, and hapū.
- PP-Directive 4.4, plans must provide for aquaculture activities within Aquaculture Settlement Areas in a manner consistent with the Māori Commercial Aquaculture Claims Settlement Act 2004.
- RW-Directive 3.1 and 3.2, remediation of contaminated land.
- The overall intent of PV-Directive 1.1 in protecting environmental health.
- PV-Direction 3.2(d) – public access to sites of significance to Māori will only be provided for with the agreement of hapū and/or iwi authorities.
- The overall intent of PV-Directive 3.3.
- PV-Directive 5.1, in identifying significant historic heritage, which includes sites of significance to Māori.
- PV-Directive 5.3 – prioritising protection of a site's significance to Māori when there is conflict with the site's historic heritage value.

While the DCC supports INFR-Directive 1.5 in managing conflict between infrastructure and significant environment and heritage values, it is unclear why sites of significance to Māori have been explicitly excluded from the management of this conflict.

DCC holds concerns regarding the long-lasting impact of PP-Directive 1.2c, which prevents stricter controls being implemented on freshwater farming activities (and its impact on freshwater and freshwater ecosystems) than those set by national standards.

In relation to PP-Directive 2.2, protection of high value growing areas, there is no reference to protecting sites of significance to Māori where they overlap with those areas. Areas of significance to Māori may therefore be overridden for economic development without appropriate consultation or direction from takata whenua, unless this is provided for in the national standards under PP-Directive 2.2(b)(ii).

DCC is concerned about the requirement in RW-Directive 1.1 for land use and environment plans to enable new mining/quarrying 'subject to effects being appropriately managed'. Appropriate management of effects will depend heavily on the

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environmental limits set within national standards, and there is uncertainty around how the long-term significant impacts of mining will be managed under these standards.

While DCC supports RW-Directive 2.4(a) regarding discharge or dumping of marine waste, DCC is concerned that the directive is not precautionary enough when science is uncertain. A lack of a precautionary approach risks significantly degrading environmental and human health.

The directive "Life supporting capacity and land use and development (primary production and infrastructure)" notes that environmental limits can be breached in specific circumstances (in accordance with standards). However, without confirmation of what the 'specified circumstances' are, there is uncertainty about the long-term impact on the life-supporting capacity of the environmental and human health, and whether this is acceptable.

Recommendations

- Amend INFR-Directive 1.5 so that adverse effects on sites of significance to Māori must also be managed.
- Amend PP-Directive 1.2c to allow for any existing stricter controls to remain in place if the national standard is more relaxed than those standards. This is to prevent further degradation of freshwater waterways and their ecosystems.
- Amend PP-Directive 2.2 to clarify how sites of significance to Māori are considered within high value growing areas. This should include consultation with takata whenua.
- Amend RW-Directive 1.1 such that identification of quarrying and mining areas in plans is optional rather than mandatory. Any land identified should be in consultation and active engagement with mana whenua, and sites of significance to Māori should be exempted.
- Amend RW-Directive 2.4(b) to be more conservative. i.e. requiring a precautionary, rather than proportionate, approach when the science is uncertain.
- Amend the directive 'Life supporting capacity and land use and development (primary production and infrastructure)' to include, or provide examples of, the specified circumstances where limits may be breached, and ensure that there are timeframes in place for limits to return within range.

The system-wide Māori interests directives:

DCC, in support of the needs and values of mana whenua and Māori, supports the following:

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- SW-Directive 1.3 – ensuring sites of significance to Māori are not developed in a way that undermines the values Māori associate with those sites.

DCC supports engagement with Māori groups for developing the regional spatial, land use, and environmental plans under SW-Directive 1.2. However, in order for DCC to continue its partnership with mana whenua and Māori in Ōtepoti Dunedin, it is important that this engagement occurs with mana whenua at a local level, through direct engagement with marae, hapū, and/or rūnaka. There should also be sufficient flexibility to allow engagement to be undertaken in a way that is appropriate in the local context, for example being consistent with Council's strategic framework and local-level agreements.

For SW-Directives 1.3 to 1.5, and the goals for Māori interests under both Acts, there is concern at the limitation of what has been identified as of 'Māori interest'. Māori interests are much wider than Māori land and sites of significance to Māori.

Recommendations:
It is recommended that:

- National standards provide for local-level engagement with mana whenua and Māori.
- Amend SW-Directives 1.3 to 1.5 to ensure that the NPD will recognise and provide for the relationship of Māori and their culture and traditions (including kaitiakitaka) with their ancestral lands, waters, sites, wāhi tapu, and other taonga and protected customary rights.

Conclusion

The DCC thanks you for the opportunity to provide feedback on the illustrative NPD. We encourage you to consider this feedback alongside other feedback from territorial authorities, Taituarā and Local Government New Zealand who may have raised broader matters than we chose to focus on. Please do not hesitate to get in touch if you would like to clarify any of the issues or comments raised in this document.

Nāku noa, nā



Sophie Barker
MAYOR
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ŌTEPOTI LIVE MUSIC ACTION PLAN REFRESH

Department: Corporate Policy and Ara Toi

EXECUTIVE SUMMARY

1 This report seeks adoption of the refreshed Ōtepoti Live Music Action Plan 2026 (ŌLMAP) that consists of the Ōtepoti Live Music Action Plan (Attachment A) and its Implementation Plan (Attachment B).)

2 The draft ŌLMAP sets out the background and rationale for refreshing this Plan.

3 The Implementation Plan (Attachment B) takes into account the knowledge and expertise provided by Dunedin City Council's (DCC) Music Advisory Group, and other live music stakeholders in the city.

4 The OLMAP Implementation Plan follows the format of the DCC's Community and Local Events Implementation Plan 2025 and includes high-level actions that will be further articulated and implemented at an operational level by DCC staff, including timeframes for delivery.

5 The new iteration of the ŌLMAP builds on the achievements and lessons learnt from the first version of this Plan which was adopted in September 2023, including: developing resources for practitioners and audiences; establishing the Music Advisory Panel; and incorporating inner-city acoustic insulation standards into the District Plan (2GP).

RECOMMENDATIONS

That the Committee:

a) **Adopts** the refreshed Ōtepoti Live Music Action Plan

b) **Delegates** authority to the Chief Executive Officer to incorporate minor editorial amendments

c) **Notes** the Implementation Plan for the Ōtepoti Live Music Action Plan (Attachment B).

BACKGROUND

6 The Ōtepoti Live Music Action Plan (ŌLMAP) was initiated in 2021. Faced with challenges regarding inner-city venue noise control, the Save Dunedin Live Music (SDLM) collective brought their concerns to the DCC. The DCC responded by endorsing work to begin the development of a live music action plan.

7 The ŌLMAP was developed between 2021 and June 2023. The work was guided by an active advisory group of representatives from SDLM and staff across the DCC. The process helped to

identify key issues and challenges for live music in Ōtepoti Dunedin and to generate a range of ideas and proposals in response.

8 Since then, the DCC has established a Music Advisory Panel comprising the Councillors who lead the Music portfolio and a diverse range of subject matter experts and stakeholders in the city who have a dedicated interest in music.

9 The current membership of the Music Advisory Panel comprises: Francisca Griffin (Chair),Crs Walker and Treadwell, Dave Bennett/Dr Fairleigh Gilmour (alternating representatives of SDLM), Karl Brinsdon, Stephen Stedman, and Bea Ward. The Youth representative role is currently vacant.

10 Along with the establishment of the Music Advisory Group, achievements since the ŌLMAP was adopted include:

- development of acoustic insulation standards for the inner city in the District Plan (2GP)
- introducing the "Noisy Spaces!" guide which highlights free and low-cost rehearsal spaces around the city
- developing an online weekly gig guide
- supporting music projects via contestable funding
- developing "Gigs101"— resources to support the delivery of safe and accessible gigs
- creation and delivery of the "Ōtepoti Hou" recording project, available on both vinyl and online, which showcases a diverse range of local music and performers. This project has received national media attention, and chart success for groups featured in the compilation.

DISCUSSION

Strategic Context

11 The ŌLMAP sits under the DCC Arts and Culture strategy Ara Toi Ōtepoti – Our Creative Future (Ara Toi Ōtepoti Strategy) was developed after extensive city-wide engagement, input from key stakeholders, and partnership with the arts and culture collective Transforming Dunedin and was adopted by Council in 2015. The Ara Toi Ōtepoti Strategy was designed to support all creative sectors in Ōtepoti Dunedin and develop an environment which acknowledges the intrinsic value of arts, culture, and creativity.

12 The ŌLMAP will align with the new Ōtepoti Performing Arts Action Plan, the draft of which is on the Council agenda for its meeting on 29 October 2026.

13 In September 2023 Council adopted Te Taki Haruru – the DCC's Māori Strategic Framework, developed in partnership with mana whenua and Māori in Ōtepoti Dunedin. Actions in the ŌLMAP Implementation Plan are aligned with the key directions of Te Taki Haruru.

14 The ŌLMAP aligns with the DCC's Festival and Events Plan, adopted in 2025. The DCC's Community and Local Events Implementation Plan 2025 supports live music activity in the city through its goals: Events for Profile and Prosperity; Events for everyone; An event-ready city; Collaborative and sustainable events; and Events made easy.

15 To align with the DCC's Zero Carbon Policy, the operational level actions to implement the ŌLMAP will include environmental sustainability considerations, and will support performing arts practitioners and organisations to minimise emissions and contribute to achieving city-wide and DCC organisational emission reduction targets.

Economic Context

16 According to the Verian report "New Zealanders' Cultural Participation in 2025", commissioned by Manatū Taonga Ministry for Cultural and Heritage:

- in 2025, 40% of New Zealanders said they had done, created or performed cultural and creative activities in the last 12 months
- 15% of these were defined as music — playing an instrument, singing, mixing, composing or writing music. Music was the second-highest activity after craft-based activities (17%)
- 31% of respondents to this survey attended a live performance of New Zealand music (e.g. a concert or gig).

17 Every five years, Creative New Zealand commissions the Audience Atlas Aotearoa. Information from this survey has been used to inform the refreshed ŌLMAP and its implementation actions.

18 The 2025 survey results indicate that recent concert goers are higher income earners. Those who have been to a live music event in the last three years are the least likely of all current artform markets to live in a household with children. Additionally, the current live music market draws more heavily on higher income earners than most other artforms.

19 The survey notes that while the proportion of disabled people in this cohort matches the market average, it is lower than most other current markets. The refreshed ŌLMAP includes new accessibility actions designed to attract and support disabled people to live music events where the DCC plays a role.

20 Data provided to the DCC by Infometrics shows that at the end of June 2025, 46,030 members of the Ōtepoti Dunedin population were aged between 0 – 24 years, and 30,900 were aged between 0 – 19 years.

21 According to the Audience Atlas Aotearoa 2025, younger people are more likely than average to have recently spent on the arts, donated or have an arts membership. They are also more likely to anticipate that their arts engagement and spend will soon increase.

22 These Audience Atlas findings are supported by the recurring themes in the DCC's own conversations to inform the refreshed ŌLMAP. Implementation actions have been developed to reflect opportunities for audience development, retention, and growth and to proactively include young people in the city in live music experiences.

Purpose of the Ōtepoti Live Music Action Plan

23 The purpose of the ŌLMAP is to:

- enhance and embrace the mana of live music in Ōtepoti Dunedin
- acknowledge and celebrate the cultural, social, and economic value a strong live music sector and infrastructure provides to Ōtepoti Dunedin

- identify strengths, opportunities, challenges, and responses for performing arts in Ōtepoti Dunedin
- work with live music communities to ensure solutions are relevant and fit-for-purpose
- provide a dedicated Implementation Plan that sets out the high-level actions to achieve the purpose of the Plan.

Rationale for a refresh of the Ōtepoti Live Music Action Plan

24 To build on the achievements of the ŌLMAP since adoption in 2023 a refresh of the Plan is important to improve outcomes, evolve to meet the current climate and reflect the shifting needs for live music in Ōtepoti Dunedin. Through conversations with the community and the Music Advisory Panel, key areas to be addressed in the refresh have been identified as:

- continuing growth and diversification in the live music scene in Ōtepoti Dunedin
- more music being made and performed by our young people
- existing foundation to build a strong, resilient ecosystem to support live music
- systemic issues that are keeping Dunedin from being included in the tour circuit, or considered as a destination for live music.

Community Feedback

25 To inform the development of the ŌLMAP, DCC staff held conversations with musicians, creatives, venue operators, promoters, event organisers, Māori and Pasifika performers, young people, older people, people with disabilities, and audience members.

26 The conversations were structured around set questions which were also used for the original version of the Plan: “What do you like about live music in Dunedin?”; “What are the main challenges or issues for live music in Dunedin?”; “What would a great live music scene in Dunedin look like?”.

27 Positive feedback was received about:

- the youth music scene
- the “do it yourself/do it together” attitude of the community
- the venues, the talent, the support systems, and the resilience of the community
- the range of music genres and gigs
- infrastructure including Otago Access Radio (OAR), Radio One, Amped, Dunedin Youth Orchestra, Dunedin Jazz Club, and “third spaces” (e.g. Yours)
- the quality of output: musical talent in the city of this size and constant regeneration.

28 Challenges identified included:

- lack of adequate rehearsal spaces, and third spaces

- not many opportunities or spaces to pursue professional opportunities
- lack of venues, impacting touring of shows
- not enough outdoor/street festivals
- grants funding not matching rising costs
- effective promotion of events
- cost of booking large local venues

29 Feedback on what a thriving live music scene would look like included:

- more venues across different sizes that can accommodate young people, bands, and large cultural events
- promotion and visibility for Ōtepoti Dunedin music
- support for education and for music as a career pathway
- accessible to all.

Structure of the ŌLMAP

30 The ŌLMAP is structured around three themes. It has been organised in such a way to reflect the feedback received from the community and the themes that have emerged from these discussions.

31 There were four themes in the original plan. Two of these themes (ecosystem and infrastructure) have been consolidated in the new version of the ŌLMAP to accurately capture the similarities and crossovers in the implementation of actions that relate to the live music ecosystem and the infrastructure that supports it.

32 The three themes in the ŌLMAP are:

- **Supporting Artists:** Local musicians have pathways to develop their practice, perform to audiences, and build sustainable careers
- **Supporting Audiences:** Ōtepoti Dunedin has a range of local live music experiences and opportunities to meet community and visitor needs
- **Supporting the Live Music Ecosystem and Infrastructure:** Local venue owners, promoters, event organisers, businesses, music organisations and educators are supported in the delivery of live music.

Context for the refresh of the Ōtepoti Live Music Action Plan

33 Since DCC staff began work on the refreshed ŌLMAP a shifting landscape for arts funding in Aotearoa New Zealand has meant potential impacts for live music in Ōtepoti Dunedin, and the scope and timeframes for actions in the ŌLMAP.

34 These shifts include a savings requirement of $27.7 million over four years for the Ministry for Culture and Heritage announced in the 2026 Budget, and associated savings requirements of:

$1.3 million over four years for Creative New Zealand; $180,000 over four years for the New Zealand Music Commission; and an overall 2% cut for NZ on Air which may impact on its support for New Zealand music projects.

35 The refreshed ŌLMAP and its Implementation Plan have been drafted while a shift to regional funding models for Creative New Zealand is underway, with an announcement of how this will be designed and operate not expected until November.

36 DCC contestable arts funding programmes will continue to operate under the current DCC grants policy criteria and budget pending any further decisions from Council in response to the wider review of DCC grants. Any subsequent changes to DCC arts grants that relate to actions in the ŌLMAP will be incorporated into its Implementation Plan following the grants review.

37 In recognition of these factors, the high-level actions in the ŌLMAP Implementation Plan will be further articulated and implemented at an operational level by DCC staff, including timeframes for delivery as more information from central government about support for the arts becomes available.

OPTIONS

Option One – Council Adopts the Ōtepoti Live Music Action Plan

38 Advantages and disadvantages to Council adopting the Ōtepoti Live Music Action Plan:

Advantages

- Opportunity to demonstrate leadership in the creative sector, and supporting live music specifically.
- Opportunity to communicate the DCC's ongoing commitment to supporting live music in Ōtepoti Dunedin.
- Opportunity to consolidate relationships built with communities across Ōtepoti Dunedin in the formation of the Music Advisory Panel and the development of the ŌLMAP and its new iteration.
- Opportunity to celebrate Ōtepoti Dunedin's rich music heritage and ensure that continues.
- Opportunity to increase the positive economic, cultural, and social impacts that are created by a thriving music sector in the city.

Disadvantages

- There are no identified disadvantages for this option.

Option Two – Council Does Not Adopt the Ōtepoti Live Music Action Plan

39 Advantages and disadvantages to Council not adopting the Ōtepoti Live Music Action Plan:

Advantages

- There are no identified advantages for this option.

Disadvantages

- Missed opportunity to demonstrate leadership in the creative sector, and supporting live music specifically.
- Missed opportunity to communicate the DCC's ongoing commitment to supporting live music in Ōtepoti Dunedin.
- Missed opportunity to consolidate relationships built with communities across Ōtepoti Dunedin in the formation of the Music Advisory Panel and the development of the ŌLMAP.
- Missed opportunity to celebrate Ōtepoti Dunedin's rich music heritage and ensure that continues.
- Missed opportunity to increase the positive economic, cultural, and social impacts that are created by a thriving music sector in the city.

NEXT STEPS

40 If Council adopts the refreshed Ōtepoti Live Music Action Plan, DCC staff will proceed to the final editing and the design stage to prepare it for publication, and will start the implementation of actions in the Plan.

Signatories

Author:	Danielle Tolson - Policy Analyst Amie Taua - Ara Toi Partnerships Team Leader
Authoriser:	Mike Costelloe - General Manager, Arts, Culture & Economic Development

Attachments

	Title	Page
⇩A	Draft Otepoti Live Music Action Plan 2027-2029	122
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SUMMARY OF CONSIDERATIONS

Fit with purpose of Local Government

This decision promotes the cultural, social, and economic well-being of communities in the present and for the future.

Fit with strategic framework

	Contributes	Detracts	Not applicable
Social Wellbeing Strategy	✓	☐	☐
Economic Development Strategy	✓	☐	☐
Environment Strategy	☐	☐	✓
Arts and Culture Strategy	✓	☐	☐
3 Waters Strategy	☐	☐	✓
Future Development Strategy	☐	☐	✓
Integrated Transport Strategy	☐	☐	✓
Parks and Recreation Strategy	✓	☐	☐
Other strategic projects/policies/plans	✓	☐	☐

The Ōtepoti Live Music Action Plan aligns with: Te Taki Haruru — the DCC's Māori Strategic Framework, the draft Ōtepoti Performing Art Action Plan (yet to be adopted), the Festival and Events Plan, and the Zero Carbon Policy.

Māori Impact Statement

The Ōtepoti Live Music Action Plan has a strategic alignment with Te Taki Haruru, the DCC's Māori Strategic Framework, and actions in its Implementation Plan are aligned with key directions in Te Taki Haruru.

Sustainability

As part of operational level actions to implement this Plan, DCC staff will include environmental sustainability considerations, and will support live music practitioners and organisations to minimise emissions and contribute to achieving city-wide and DCC organisational emission reduction targets.

LTP/Annual Plan / Financial Strategy /Infrastructure Strategy

There are no implications.

Financial considerations

There are no financial implications.

Significance

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

Engagement – external

DCC staff undertook extensive external engagement to inform the development of this plan, including performers, creatives, venue operators, promoters, event organisers, Māori and Pasifika practitioners, young people, older people, people with disabilities, and audience members.
The DCC's Music Advisory Panel were involved in the refresh of the Plan, DCC staff consulted with Living Well and Arts Access Aotearoa on the Accessibility actions in the Implementation Plan.

SUMMARY OF CONSIDERATIONS
Engagement - internal The development of this Plan has been led by the Ara Toi and Corporate Policy teams, with input from other DCC teams including the Compliance Solutions, Events, Enterprise Dunedin, and Property teams. Staff also consulted with the DCC's Disability Issues Advisory Group and will continuing active engagement with this group, and the Dunedin Youth Council.
Risks: Legal / Health and Safety etc. There are no identified risks.
Conflict of Interest There is no conflict of interest.
Community Boards There are potential implications, including benefits, for Community Boards when actions from the refreshed Ōtepoti Live Music Action Plan occur in Community Board areas.

THE ŌTEPOTI LIVE MUSIC ACTION PLAN 2027-2029

1. INTRODUCTION

Tēnā koutou katoa,

He mihi tēnei i kā huamokopuna o tēnei whenua,

kā uri o Tahupōtiki, o Hotu Māmoe, o Waitaha hoki.

Ka rere atu kā mihi i kā hapū o Kāi Te Ruahikihiki me Kāti

Huirapa, mai i kā mauka tapu o Pukekura, a Hikaroroa hoki ki a

koutou e noho karapotia nei i tō tātou awa o Ōtākou tae atu ki

kā kete kai o Waikouaiti. Kai te mihi, kai te mihi.

Karaka atu, karaka atu, karaka atu ki ka karakataka maha e

noho ana i te rohe nei. E hāpai ana i kā Toi tā tēnā ahurea tā

tēnā ahurea. Kia mau, kia ita, kia Toitu!

Greetings to all,

This is an acknowledgement from the grandchildren of this land, the descendants of Tahupōtiki, Hotu Māmoe and Waitaha.

The acknowledgement is extended from the subtribes of Te Ruahikihiku and Huirapa, from the sacred mountains of Pukekura and Hikaroroa to all who live around our waterway, Ōtākou and Puketeraki. Salutations.

We call to the many people of all cultures who live in this area to hold on to and uplift their cultural practices.

Music is a platform for telling stories, for bringing people together, and for expressing identity. Live music generates vibrancy, provides entertainment, and creates economic value. Live music is part of our social, cultural, and economic wellbeing and helps our city thrive[i]. The Ōtepoti Live Music Action Plan (ŌLMAP) is Dunedin City Council's (DCC) commitment to the people who experience, participate, create, and support live music in our city, now and into the future.

The ŌLMAP 2027-2029 builds on the successes of the first version of the Plan, which was implemented in 2023. Since the inception of ŌLMAP, live music in Ōtepoti Dunedin has evolved and expanded in new and exciting ways. There are an ebb and flow of music venues in the city, and the community continues to show their passion and commitment through the musicians, gigs and musical initiatives they support. 2026 saw the completion of a new local music compilation *Ōtepoti Hou* which feature 10 new songs from musicians, bands, and cultural groups making music in the city. *Rolling Stone Australia* acknowledged the resurgence of new music coming out of the city with a series of profiles throughout 2025-2026[ii].

Initiatives like the Amped music project, the Dunedin Youth Orchestra and the ongoing success of local performers participating in Smokefree Rockquest continue to excel rakatahi music skills and technical excellence. The ecosystem from early childhood education right through to the professional sector continues to support music making and music sharing in Ōtepoti Dunedin.

While acknowledging the shifts and wins for live music in the community is important, there are still challenges to be addressed. Noise complaints and knowledge of the regulatory processes involved continue to be a concern, along with visible support and pathways for musicians in the city, accessible day-time free outdoor live music events and availability of rehearsal spaces.

Other challenges include how audience development can be nurtured and maximised; ongoing viability of mid-sized, fit-for-purpose venues; mentoring and opportunities for young performers and supporting roles; and positioning the city on the national music touring circuit.

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2. EXECUTIVE SUMMARY

The ŌLMAP was initiated in 2021. Faced with challenges regarding inner-city venue noise control, the Save Dunedin Live Music (SDLM) collective brought their concerns to the DCC. The DCC responded by endorsing work to begin the development of a live music action plan.

The ŌLMAP was developed between 2021 to June 2023. The work was guided by an active advisory group of representatives from SDLM and staff across the DCC. The process helped to identify key issues and challenges for live music in Ōtepoti Dunedin and to generate a range of ideas and proposals in response. Since then, the DCC has established a Music Advisory Panel comprising the Councillors who lead the Music portfolio and a diverse range of subject matter experts and stakeholders in the city who have a dedicated interest in music.

The refreshed ŌLMAP is supported by a new Implementation Plan for 2027-2029.

The Ōtepoti Live Music Action Plan identifies three main themes:

THEME ONE: Supporting Artists

Local musicians have pathways to develop their practice, perform to audiences, and build sustainable careers.

THEME TWO: Supporting Audience

Ōtepoti Dunedin has a range of local live music experiences and opportunities to meet community and visitor needs.

THEME THREE: Supporting the Live Music Ecosystem and Infrastructure

Local venue owners, promoters, event organisers, businesses, music organisations, and educators are supported in the delivery of live music. Ōtepoti Dunedin has improved access to fit-for-purpose live music venues to enrich the community and creative sector development.

The purpose of the Ōtepoti Live Music Action Plan is to:

- Support thriving, vibrant music in Ōtepoti Dunedin
- Champion the diverse range of live music that takes place in Ōtepoti Dunedin
- Identify opportunities, strengths, challenges and solutions for live music in Ōtepoti Dunedin
- Collaborate with the music community to ensure strong ongoing community involvement

To implement the Ōtepoti Live Music Action Plan, DCC staff will:

- Align the Plan with and incorporate Te Taki Haruru, the DCC's Māori Strategic Framework into the implementation of the Plan. The Plan will also align with related DCC plans, policies, and strategies.
- Develop a work programme, at an operational level, for delivery of the actions in the Plan
- Scope indicative timeframes for delivery of actions in the Plan
- Identify broad resourcing requirements for delivery of actions in the Plan
- Review and update the implementation plan annually

Measuring Progress and Success

Progress on the implementation of the ŌLMAP for 2027 – 2029 will be measured by:

- A forward work plan will be developed at the beginning of each year, with regular updates provided to the Music Advisory Panel and to Council
- Wider communications to the community via social media.

The success of this plan will be illustrated through:

- Understanding of what an accessible live music gig looks like and how it can be rolled out across the city, while keeping the city's unique topography in mind
- Creating productive feedback loops on existing live music initiatives and new/piloted programmes
- Regular maintenance of resources such as Noisy! Spaces! and GIG101 to ensure relevance and appropriate, up-to-date information enables live music in the city
- Supporting local musicians to be involved city-wide events where live music is taking place,
- Measuring the development of the existing live music ecosystem that accurately captures the value and balance of the role of volunteering and artists being paid.

3. ŌTEPOTI DUNEDIN'S RICH MUSIC HISTORY

Ōtepoti Dunedin's live music is the stuff of legend. We are a city of creatives and creativity with one of New Zealand's best known music scenes. Our city has produced, and continues to produce, some of the country's most notable songwriters, performers, and musicians.

From haka and waiata to mōteatea and oriori the Ōtepoti Dunedin landscape is layered with expressions of Kāi Tahu traditions. Māori expressions of music have an important place in the transmission and survival of Māori knowledge and culture. Music is central to Māori identity, place and belonging, and is an expression of a unique and continuing tradition.

The Wellerman sea shanty takes its origins from the whaling station established at Ōtākou by brothers Joseph and Edward Weller in 1831. It found renewed fame on TikTok in 2021 and was reclaimed by Ōtākou mana whenua in 2022 to tell a local story in a global context[iii].

Thomas Bracken's poem *God Defend New Zealand*, scored by John Joseph Woods, had its first public outing on Christmas night 1876, at a concert in Ōtepoti Dunedin's Queen's Theatre. Rights to the work were eventually acquired by another local musical enterprise, Charles. Begg & Co, who sold it to the government in 1940 when it became New Zealand's national anthem. Charles Begg set up his piano-manufacturing business in Princes Street in 1861. Begg's pianos were sold throughout the country, and branches were set up as far afield as Auckland and Wellington. Always an early adopter, it was Begg who first published Ruru Karaitiana's original composition *Blue Smoke* in 1947[iv].

Throughout the 1960s and 1970s Mosgiel entrepreneur Joe Brown's eponymous record label was home to the likes of Sir Howard Morrison, John Hore and Eddie Low[v]. The city also boasted country

favourites the Tumbleweeds[vi] and rock band Mother Goose[vii].

The 1980s saw the rise of bands like The Verlaines, Look Blue Go Purple, The Chills, The Clean, and Straitjacket Fits pioneering what would become known collectively as the famous 'Dunedin Sound[viii]'. The Dunedin Sound travelled far and wide and continues to be a calling card for the city.

Singers and Otago alumni Jonathan Lemalu[ix], Anna Leese[x], and Simon O'Neill[xi] perform in opera companies around the world, and international accolades likewise accrue for performers, composers, and teachers such as Dame Gillian Whitehead[xii], Anthony Ritchie[xiii], Michael Norris[xiv] and Terence Dennis[xv]. All these music-makers continue to enrich Ōtepoti Dunedin's musical landscape in the broadest sense.

The band Six60, named for their flat on Castle Street, continues to attract stadium crowds and in 2022 was New Zealand's most-streamed artist on Spotify[xvi]. Musicians and groups grown from our city, acts such as Anthonie Tonnon[xvii] and Nadia Reid[xviii], continue to make national and international impact.
Ōtepoti Dunedin's eclectic range of music festivals offers something for everyone. Family-friendly Whare Flat Folk Festival is the place to catch the next Reb Fountain before they hit the national scene[xix].

Otago Polyfest is our largest performing arts event and since 1993 has welcomed thousands of young people and whānau annually from across Otago to perform and celebrate Māori and Pāsifika cultures and artforms. At the other end of the spectrum is a private backyard in Dalmore which has been home to Feastock — "the country's most idiosyncratic indie music festival"[xx] since 2009.

The DCC acknowledges and celebrates all the past, present and future creators, makers, supporters, advocates, and performers of music in our city. From the brass bands to the orchestras to the people playing music in their homes. Music creation and performance have a history of bringing vibrancy to our city, is woven into the city's fabric and is loved by residents and visitors alike. Music is a vital expression of our city's past, present, and future cultural wellbeing and the DCC recognises the dedication, knowledge, and expertise of all those involved.

One of the many strengths of Dunedin's live music scene is the multitude of incredible opportunities to make music, be a part of a community through supporting live music to happen or engage as an audience member. Pathways across genre and discipline are peppered across the city and calendar, taking many forms. One thing that is clear, is the community continues to grow ways for everyone to be involved in live music.

4. CONTEXT

Council roles and responsibilities

To ensure the success of the ŌLMAP, the DCC will work closely with stakeholders across the music sector, adopting a strategic and unified approach to ensure successful delivery of the actions in the Plan.

The DCC has various roles and responsibilities:



A. Ara Toi Ōtepoti Strategy – Our Creative Future

Dunedin is one of the world's great small cities with arts and culture at its core.[xxi]

The DCC Arts and Culture strategy Ara Toi Ōtepoti – Our Creative Future (Ara Toi Ōtepoti Strategy) was developed after extensive city-wide engagement, input from key stakeholders, and partnership with the arts and culture collective Transforming Dunedin and was adopted by Council in 2015.

The Ara Toi Ōtepoti Strategy was designed to support all creative sectors in Ōtepoti Dunedin and develop an environment which acknowledges the intrinsic value of arts, culture, and creativity. The ŌLMAP sits as an action plan under the umbrella of the Ara Toi Ōtepoti Strategy.

Te Taki Haruru

In September 2023 Council adopted Te Taki Haruru – the DCC's Māori Strategic Framework, developed in partnership with mana whenua and Māori in Ōtepoti Dunedin.

This framework outlines the principles, values, and key directions of mana whenua for cultural, social, economic and environmental wellbeing. It also reaffirms a shared commitment to a Treaty of Waitangi partnership, highlighting how Māori wellbeing fits into the wellbeing framework for Local Government.

Te Taki Haruru has four primary statements of intent, which are:

a. Mana whenua are leaders, influencers and partners (Autūroa)

b. The mauri of Ōtepoti Dunedin is restored and enhanced (Auora)

c. Balance is restored and the future of our people and resources are protected (Autaketake)

d. The traditional authority of mana whenua in Ōtepoti Dunedin is recognised through partnerships based on reciprocity and respect (Autakata).

Te Taki Haruru will help the DCC respond effectively to its Treaty obligations and strengthen its partnership with mana whenua and Māori. The framework fosters collaboration between mana whenua and Māori with the Council, allowing all at the DCC to better understand mana whenua within a local government context.

Te Taki Haruru has three pou (pillars) or components that sit under this primary framework:

- Tū Kotahi – the DCC Staff and Cultural Capability Framework. Tū Kotahi is designed to strengthen the cultural ability by providing all at the DCC with a deeper understanding of te ao Māori and the Treaty as it relates to DCC mahi.

- Tū Ake – is the operationalisation of the values, principles, and key directions of Te Taki Haruru. It enables the DCC to integrate these elements of Te Taki Haruru into event planning, design and programming. Additionally, it will enable systems that acknowledges Māori and mana whenua contributions to performing arts in Ōtepoti Dunedin.

- Tū Hono – the Māori Engagement Framework. This provides DCC staff with guidelines and resources to be able to effectively engage with mana whenua and Māori in Ōtepoti Dunedin. Overall, Te Taki Haruru provides the required guidance to integrate the principles and values of mana whenua, through the key directions, into this Performing Arts Plan.

Ōtepoti Performing Arts Action Plan

The Ōtepoti Performing Arts Action Plan is designed to work in conjunction with the ŌLMAP. Its purpose us to: enhance and embrace the mana of performing arts in Ōtepoti Dunedin; acknowledge and celebrate the cultural, social, and economic value a strong performing arts sector and infrastructure provides to Ōtepoti Dunedin; identify strengths, opportunities, challenges, and responses for performing arts in Ōtepoti Dunedin; and work with performing arts communities to ensure solutions are relevant and fit-for-purpose.

Festival and Events Plan

The DCC's Community and Local Events Implementation Plan 2025 supports performing arts activity in the city through its goals: Events for Profile and Prosperity; Events for everyone; An event-ready city; Collaborative and sustainable events; and Events made easy.

Zero Carbon Policy

In 2019 the DCC declared a climate emergency and set the goal to become a Zero Carbon city by 2030. To align with the DCC's Zero Carbon Policy, as part of our operational level actions to implement this Plan, we will include environmental sustainability considerations and will support performing arts practitioners and organisations to minimise emissions and contribute to achieving city-wide and DCC organisational emission reduction targets.

B. What is live music?

"Live music" is an in-person performance by an individual musician, a band, or a collective of musicians, singers, or noise artists. Live music can have an audience of one person, a stadium of loyal fans, or roaming listeners during a street festival.

Live music can turn into a song or album that is captured online and in physical media, which can, in time, become the soundtrack of a city, a moment in time, or a memory.

Live music in Ōtepoti Dunedin can be kapa haka performances at Otago Polyfest, University of Otago O-Week gigs, music festivals, buskers, a local band at the Crown, or the Dunedin Symphony Orchestra in the Town Hall. What connects these diverse music activities is that they are live experiences shared by musicians and audiences, supported by an eco-system of businesses, venues, promoters, and community organisations.

C. Why does live music matter?

In the context of live music, Ōtepoti Dunedin attracts creatives because of our internationally respected music history and culture, our unique approach to networking and connecting, our creative thinking and individuality, and our ability to bring communities together to enjoy live music.

At its core, many people obtain intrinsic benefit from listening to and being part of live music. The value of live music is understood by many whether it's the thrill of haka at a cultural performance, performing in front of a packed crowd, or listening to a singer-songwriter at an album launch. Live music makes our city more vibrant, liveable, and enhances the lifestyle of many people within it. A rich and vital live music scene is one of the many elements that make people love Ōtepoti Dunedin and encourages them to make the city their home or visit again and again.

D. What makes a vibrant and thriving music scene?

Cities around the world acknowledge that a live music scene is likely to thrive when the following needs are met[xxii].

A Cohesive Ecosystem

For live music to flourish, in addition to large venues, there needs to be adequate spaces for musicians to rehearse, grassroots music venues where they can hone their skills, mid-size venues so that bands can tour to Ōtepoti. This network of spaces encourages creative and professional connections, as well as providing access to a range of performance opportunities.

A Creative Infrastructure

Venues and promoters are empowered and do not face unreasonable barriers when setting up and operating their enterprises and activities.

Connected Audiences

Local audiences can and do access quality, affordable, and enjoyable music experiences across diverse genres and cultural contexts.

Supported Artists

Music practitioners have pathways to develop their practice, perform to audiences, and build sustainable careers.

Community Wellbeing

The community appreciates and values the contribution that live music makes to the wellbeing of individuals, groups and to the cultural identity and wellbeing of the city.

E. Ōtepoti Dunedin's arts, culture and creative sector

Creative Contribution

According to the Verian report "New Zealanders' Cultural Participation in 2025" [xxiii], commissioned by Manatū Taonga Ministry for Cultural and Heritage:

- In 2025, 40% of New Zealanders said they had done, created or performed cultural and creative activities in the last 12 months
- 15% of these were defined as music — playing an instrument, singing, mixing, composing or writing music. This was rated second highest after craft-based activities (17%)
- 31% of respondents to this survey attended a live performance of New Zealand music (e.g. a concert or gig).

Every five years, Creative New Zealand commissions the Audience Atlas Aotearoa. Information from this survey has been used to inform the refreshed ŌLMAP and its implementation actions.

The 2025 survey results indicate that recent concert goers are higher income earners. Those who have been to a live music event in the last three years are the least likely of all current artform markets to live in a household with children. Additionally, the current live music market draws more heavily on higher income earners than most other artforms.

The survey notes that while the proportion of disabled people in this cohort matches the market average, it is lower than most other current markets. The refreshed ŌLMAP includes new accessibility actions designed to attract and support disabled people to live music events where the DCC plays a role.

Data provided to the DCC by Infometrics shows that at the end of June 2025, 46,030 members of the Ōtepoti Dunedin population were aged between 0 – 24 years, and 30,900 were aged between 0 – 19 years.

According to the Audience Atlas Aotearoa 2025[xxiv], younger people are more likely than average to have recently spent on the arts, donated or have an arts membership. They are also more likely to anticipate that their arts engagement and spend will soon increase.

These Audience Atlas findings are supported by the recurring themes in the DCC's own conversations to inform the refreshed ŌLMAP. Implementation actions have been developed to reflect opportunities for audience development, retention, and growth and to proactively include young people in the city in live music experiences.

F. Our strength is our community

A vibrant music scene enhances the quality of life in our community. It stimulates cultural wellbeing, drives economic growth, and cultivates creativity. It is an essential component of a thriving and dynamic community, offering benefits to individuals and the wider populace. If music thrives in the city, it creates opportunities for us to:

- elevate mana whenua visions for live music in the city
- celebrate and support all musical voices to foster energetic, diverse music communities from all cultural contexts
- support and nurture local music practitioners so that they can develop their practices, grow their careers, and establish themselves within the music landscape
- provide accessible opportunities for people to engage with and contribute to local music activities as makers, supporters, and audiences
- support a wealth of musical expression by encouraging musicians and audiences to push their creative boundaries and embrace musical risks
- facilitate opportunities for collaboration and connection within and between music communities, practitioners, and businesses at local and national levels

- foster a cultural identity where live music contributes to the local economy and a dynamic city centre.

5. REFRESHING ŌLMAP FOR THE FUTURE

We have achieved a lot in the three years in collaboration with the community, but there are areas of the plan to improve, evolve to meet the current climate, and reflect the shifting needs for live music in Ōtepoti Dunedin. Through conversations with the community and the Music Advisory Panel, we know that:

- Our live music scene continues to grow and diversify
- There is more music being made and performed by our young people
- We have the foundation to build a strong, resilient ecosystem to support live music
- We need to address systemic issues that are keeping Dunedin from being included in the tour circuit, or considered as a destination for live music

The plan will reflect the same themes, with a refreshed approach that acknowledges the new challenges, taking an innovative approach to ongoing issues facing live music. This approach is strengthened through an inter-departmental DCC approach, a strong, informed Music Advisory Panel, and ongoing conversations with community.

A. Current landscape and challenges for live music

The context of the ŌLMAP refresh is an evolving one. Contributing factors such as the cost-of-living crisis that inform where people can and are willing to invest their resource and time. Changes to national arts funding distribution, and proposed changes to the local government structure need to be acknowledged and subsequently inform the agility in plans like the ŌLMAP that are localised in nature but are intended to be implemented in partnership with communities and stakeholders across the motu.

The city's geography makes for unique challenges in staying connected nationally and internationally. What informs our unique sound and innovation in live music means is, in part, the isolation that can limit the audience that is reached. Reconnection is a principle that underpins ŌLMAP, as well as the reinvigoration of the tour circuits across Te Waipounamu and Aotearoa.

Since the Ōtepoti Live Music Action Plan was adopted in 2023, our city has undergone some positive changes that support a vibrant and musically active city. The George Street refurbishment, in conjunction with the music retailers and venues re-entering the main street breathes new life into a more accessible and welcoming city centre.

B. Changes to the live music ecosystem

South Link Productions opened in early 2024 and offers free recording and production opportunities to the community. The opening of the South Dunedin Library in September 2025 also opened opportunities for music making via its own recording studio Taupuni Oro. This sector-specific infrastructure allows for a wider range of genres to be captured by community, for community, in real time, complementing the world-class recording studio, Te Korokoro o te Tūī, on the University of Otago campus.

C. Perspectives on Ōtepoti Dunedin's live music scene

Insights on Ōtepoti Dunedin's live music scene have been gathered over the last two years. Engagement included conversations with musicians, creatives, venue operators, promoters, event organisers, young people, people with disabilities, music teachers, music retailers, and audience members. Save Dunedin Live Music also undertook a survey of its community members, and this feedback has informed the refreshed Action Plan.

Communities told us that there were challenges and difficulties with performing and music-making in the city, and barriers to attending gigs and performances. We also heard about the performers, the much-loved music venues, and the deep passion and aspirations that music communities have for their art. These perspectives are summarised here:

What people loved:

- Youth music scene
- The "Do it yourself/do it together" attitude of the community
- The venues, the talent, the support systems, and the resilience of the community
- The range and regularity of music genres and gigs
- Infrastructure: Otago Access Radio (OAR), Radio One, Amped, Dunedin Youth Orchestra, Dunedin Jazz Club, third spaces like Yours
- The quality of output: musical talent in the city of this size and constant regeneration

What people saw as challenges or issues:

- Lack of adequate rehearsal spaces with back line equipment, and third spaces
- Not many opportunities or spaces to pursue professional opportunities
- Lack of venues, impacting touring of shows
- Not enough outdoor/street festivals
- Grants funding not matching rising costs
- Effective promotion of live music events
- Concerns regarding noise complaints
- Cost of booking large local venues

- Touring outside of the city

What a thriving live music scene in Ōtepoti Dunedin would look like:

- more venues across different sizes that can accommodate young people, bands, and large cultural events
- promotion and visibility for Ōtepoti Dunedin music
- Live music all year round
- More free, outdoor live performances
- Events that celebrate Dunedin music and its legacy
- A city connected and welcoming on touring acts
- Active, regular audiences
- support for education and for music as a career pathway
- accessible to all.

Conversations with our communities

In discussing Ōtepoti Dunedin's live music scene, our community of musicians, educators, coordinators and advocates is as passionate and inspired as ever. The groundswell of new music, community music initiatives, the growing number of studio spaces for recording and fresh talent coming through with the many pipelines is reinvigorating the sector. We can see this in some of the snapshots of their definition of what a "thriving live music scene" looks like:

"A thriving Ōtepoti music scene is one where people can afford to make music, have somewhere to practise [and] perform it, and have pathways to keep developing."

"Something for everyone to go to every day / every night"

"Lots of free/outdoor accessible events."

"Stronger pathways for rangatahi. I love the new bands emerging, Dunedin records and the 4 eps release. Also loved the Ōtepoti Hou compilation. I feel positive about the future"

"More venues for all ages gigs and alcohol-free spaces."

"Multi-year funding would provide certainty."

"More venues and choice for performers Retention of community centred spaces."

"Lots of collaboration between the different scenes. Easier access for people who don't have money."

"We have such a unique culture here. It needs and deserves to be nurtured"

"More international and big national acts coming to Ōtepoti more regularly. More support for

Dunedin musicians to record and release music, and to tour."

"Abundant resourced rehearsal spaces. A gear library".

The future is bright for live music in Ōtepoti Dunedin. What our live music scene needs is continued support. A strong, robust framework that has been developed in partnership with the community and local stakeholders is a great way to start.

D. ŌLMAP Achievements 2023 -2026

In the last three years, DCC staff have worked alongside the live music community to develop resources, provide funding opportunities to realise live music projects and events, and consistently work to connect musicians, studio producers, community leaders, local music organisations and national music organisations to elevate the incredible achievements and music being realised across the whenua.

Below are a few key implementation points that have been realised together with the Music Advisory Panel, stakeholders and the wider live music community:

- development of acoustic insulation standards for the inner city in the District Plan (2GP)
- introducing the "Noisy! Spaces!" Guide which highlights free and low-cost rehearsal spaces around the city
- developing an online weekly gig guide
- supporting music projects via contestable funding
- developing "Gigs101"— resources to support the delivery of safe and accessible gigs
- creation and delivery of the "Ōtepoti Hou" recording project, available on vinyl, cassette and online, which showcases a diverse range of local music and performers:
    - contributors connected with local music mentors
    - contributors were supported to access studios and producers to record their original songs
    - each song was mastered professionally
    - all contributors maintain full ownership and copyright of their mastered contribution to the Ōtepoti Hou Vinyl compilation
    - Along with local promotion, this project has received national media attention, and chart success for groups featured in the compilation.

These achievements illustrate just a portion of what is possible when a framework enables

collaboration, connection and innovative, inspiring approaches to realising the ŌLMAP. Looking to the future, there is much work to be done; this time with lessons learnt and renewed aspirations led by the live music community.

5. THE ŌTEPOTI LIVE MUSIC ACTION PLAN 2027 - 2029

"Ōtepoti is a city of history, music and arts, and these three things should always be at the forefront of our city's identity, let's not let this city turn into a boring modernist nightmare like every other main centre seems to be. Keep Dunedin loud! Keep Dunedin interesting! Keep Dunedin different! Let's be the cultural hub we have always been and let's be proud of that!"

"We have such a unique culture here. It needs and deserves to be nurtured."

A. The ŌLMAP Music Advisory Panel

The development of the ŌLMAP involved a proactive working relationship between the DCC and music communities. A successful action from the first iteration of the Plan was the establishment of a Music Advisory Panel for the DCC. The advisory group brings representatives from diverse music communities together in an ongoing discussion. The aspirations of mana whenua and Māori will be expressed through representation on this group. The advisory group will also ensure that marginalised and underrepresented voices are heard and responded to.

B. The ŌLMAP Themes

The ŌLMAP is a dedicated plan that continues to develop and be realised in partnership with our community to strengthen and sustain live music in the city. Through community engagement, the following themes have emerged:

1. **Supporting Artists:** Local musicians have pathways to develop their practice, perform to audiences, and build sustainable careers.

2. **Supporting Audiences:** Ōtepoti Dunedin has a range of local live music experiences and opportunities to meet community and visitor needs.

3. **Supporting the Live Music Ecosystem and Infrastructure:** Local venue owners, promoters, event organisers, businesses, music organisations, and educators are supported in the delivery of live music. Ōtepoti Dunedin has improved access to fit-for-purpose live music venues to enrich the community and creative sector development.

C. How we measure success

This is how we will know the Council is delivering on the Ōtepoti Dunedin Live Music Action Plan:

- The Council will have strong relationships with Māori and mana whenua, our event organisers and community stakeholders
- All members of our community will benefit from the way we strategically leverage events
- Our events will play an integral role in stimulating our city's economic growth and lifting our profile as a visitor destination
- Dunedin will have a vibrant calendar of year-round event experiences that celebrate our culture, diversity, and outstanding built and natural assets
- Local and community events will drive social connectedness and civic pride
- Risks will be well-managed and a city-wide approach to events will be firmly established
- There will be an increase in the use of the Dunedin City Council's new and existing event spaces, facilities and assets
- Existing Dunedin events with the potential to grow will be supported
- There will be opportunities for event organisers to connect, network and share knowledge to create a more resilient industry
- Dunedin's events will follow sustainable practices to support a Carbon Zero city.

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1

DRAFT: Ōtepoti Live Music Action Plan 2027-2029
Implementation Plan

THEME ONE: Supporting Artists ***Local musicians have pathways to develop their practice, perform to audiences, and build sustainable careers***			
Action	**How we will deliver**	**How we will measure success**	**Alignment with Te Taki Haruru**
Provide the "GIGS 101" resource for advice and guidance for emerging practitioners.	We will maintain and update the "GIGS 101" resource which is an outcome of the ŌLMAP	Emerging practitioners access the resource and provide positive feedback about its usefulness Feedback from the wider music community is that the resource has a positive and worthwhile impact for emerging practitioners	Māori networks are well connected and supported to build a prosperous future. Māori will have access to opportunities that enable social equity.
Supporting sustainable career pathways in music that are based in Ōtepoti Dunedin	We will support existing initiatives that provide learning opportunities and career pathways Collaboration between existing organisations and initiatives will be supported	Local practicing musicians will feature in events supported by the DCC Learning and skill building through volunteering is facilitated and supported by the DCC	Māori networks are well connected and supported to build a prosperous future. Māori will have access to opportunities that enable social equity.

2

Support for music through DCC grants	We will continue to support local music through DCC grants funding	Celebrate and recognise music events, activities and initiatives that are supported through DCC funding.	Māori will have access to opportunities that enable social equity.
Embed live music into the DCC's festivals and events programming	DCC teams will work together to deliver vibrant experiences and opportunities that include and promote performing arts in the city Performance-rich festivals will be incorporated into DCC marketing programmes	DCC festivals and events are enhanced and enriched by performing arts in ways which strengthen our cultural identity and develop a thriving and enduring performing arts scene in Ōtepoti Dunedin.	Māori heritage and culture are visible, celebrated, protected and future-proofed. We are guided by tikaka and kawa (protocols) for the wellbeing of our whānau and wider community.
Support the visibility of local live music and events	DCC teams will work together and with the community to promote live music in the city.	Live music events are featured in DCC promotional material and campaigns. DCC supports local live music through existing city-wide event opportunities New and existing live music venues are promoted to local, national and international	Māori heritage and culture are visible, celebrated, protected and future-proofed. Māori will have access to opportunities that enable social equity.

		promoters, musicians and audiences.	
Ensure live music information on the DCC website and social media channels are in adaptive/ accessible formats	We will work with DCC advisory groups to identify and road test adaptive and accessible formats and make changes based on this advice.	Live music information on the DCC website and social media platforms is provided in adaptive/ accessible formats.	Public facilities and services meet the cultural needs, practices and values of Māori. Māori will have access to opportunities that enable social equity.
THEME TWO: <u>Supporting Audience</u> ***Ōtepoti Dunedin** has a range of local live music experiences and opportunities to meet community and visitor needs*			
Support audience development for live music in Ōtepoti Dunedin	We will research and investigate methods to grow and maintain audiences for music in Ōtepoti Dunedin	New audiences are attracted to live music activities and events in Ōtepoti Dunedin	Māori heritage and culture are visible, celebrated, protected and future-proofed. The Māori economy is recognised as a critical part of our collective wellbeing.
DCC spaces are accessible to all	We will undertake accessibility audits on DCC spaces used for live music and implement recommendations.	DCC spaces used for live music meet the compliance requirements for accessibility for disabled people. All people feel welcome and safe and can easily access live music	Public facilities and services meet the cultural needs, practices and values of Māori. We are guided by tikaka and kawa for the wellbeing of our whānau and wider community.

4

	We will work with DCC advisory groups and industry specialists to ensure accessibility needs are met.	events and activities in DCC spaces.	Māori will have access to opportunities that enable social equity.
Support use of DCC Green spaces	We will identify opportunities to further support inclusion and accessibility at live music events at DCC Green Spaces	Our residents feel welcome and safe, and can easily access live music events and activities in Ōtepoti Dunedin	We are guided by tikaka and kawa for the wellbeing of our whānau and wider community. Māori will have access to opportunities that enable social equity. Public facilities and services meet the cultural needs, practices and values of Māori.
Explore opportunities to recognise and celebrate Ōtepoti Dunedin's rich and unique music history.	We will engage with relevant stakeholders and collaborators to facilitate how this opportunity can be realised with care and consideration, including practical logistics.	Ōtepoti Dunedin residents and visitors actively engage in "Dunedin music" heritage activities.	We are guided by tikaka and kawa for the wellbeing of our whānau and wider community. Māori heritage and culture are visible, celebrated, protected and future proofed.

5

			The Māori economy is recognised as a critical part of our collective wellbeing.
Support for all-ages music events across the city	Continue to explore ways in which all age audiences engaging in live music are encouraged and supported. Create avenues to collect advice and feedback on the value of all-ages gigs and continuing to improve the city's offerings.	Higher numbers of young people are engaging with live music. Attendance numbers are collected from live music events and used to inform future programming Feedback is collected from both audiences and organisers about the benefits of all age's events in Ōtepoti Dunedin	We are guided by tikaka and kawa for the wellbeing of our whānau and wider community. Māori will have access to opportunities that enable social equity. Public facilities and services meet the cultural needs, practices and values of Māori.
THEME THREE: <u>Supporting the Live Music Ecosystem and Infrastructure</u> ***Local venue owners, operators, promoters, event organisers, businesses, music organisations, and educators are supported in the delivery of live music.*** ***Ōtepoti Dunedin has improved access to fit-for-purpose live music venues to enrich the community and creative sector development.***			

6

Align the ŌLMAP with other DCC arts initiatives (for example, Ōtepoti Performing Arts Action Plan the UNESCO City of Literature), Ara Toi Strategy, Dunedin Festivals and Events Plan, Economic Development Strategy, Heritage Action Plan	DCC teams will work together to maximise opportunities to promote arts initiatives in Ōtepoti Dunedin	DCC arts initiatives include and promote crossovers and collaborations between artforms, including music.	Māori heritage and culture are visible, celebrated, protected and future proofed. We are guided by tikaka and kawa (protocols) for the wellbeing of our whānau and wider community. Māori networks are well connected and supported to build a prosperous future.
Assist with the establishment of a creative office hub in the city	We will work with the music community and other city stakeholders to establish a shared office space for practitioners	Music practitioners in Ōtepoti Dunedin can access a suitable shared office space to develop work, network, and collaborate	Māori networks are well connected and supported to build a prosperous future. Public facilities and services meet the cultural needs, practices and values of Māori.
Provide education about noise control requirements across the city	We will continue to work with the live music community on education around noise control regulations and how they are managed	The live music community, including venues, feel well informed about how noise is manged in the city	We are guided by tikaka and kawa (protocols) for the wellbeing of our whānau and wider community. Public facilities and services meet the cultural needs, practices and values of Māori.

7

Provide the "Noisy Spaces!" resource for Information on rehearsal spaces across the city	We will maintain and update the "Noisy Spaces!" resource	Practitioners access the resource and provide positive feedback about its usefulness	Māori networks are well connected and supported to build a prosperous future. Māori will have access to opportunities that enable social equity. Public facilities and services meet the cultural needs, practices and values of Māori.

RESIDENTS' OPINION SURVEY RESULTS 2025-2026

Department: Corporate Policy

EXECUTIVE SUMMARY

1 This report provides a summary of the annual results of the 2025-26 Residents' Opinion Survey (ROS) for the Dunedin City Council (DCC). The ROS Annual Report 2025-26 was prepared by Enlighten Me Research Ltd and is provided as Attachment A.

2 The DCC has commissioned an annual survey since 1994 to measure how Ōtepoti Dunedin residents use and experience the Council's facilities, services, and infrastructure, and how they feel about the city and the Council's leadership. The ROS Annual Report collates and analyses the responses received over the past year.

3 Below are the main takeaways from this year's annual report:

a) Overall satisfaction was 41% in 2025-26. While this represents a statistically significant decrease compared with the previous reporting period, the result remains broadly in line with recent years, noting a temporary dip around the October 2025 election period and mid-40% satisfaction before and after that period.

b) Perceived value for money continues to be the strongest driver of overall satisfaction, highlighting the importance residents place on relationship between rates and Council services.

c) Residents value community facilities highly though these are lower impact drivers for the overall satisfaction.

d) To lift the overall satisfaction, the report recommends focusing on making progress where residents are hardest to satisfy; that is being roading (34% satisfaction rate) and water services (49%).

e) The respondents provided feedback on why they rated some services highly.

- Residents identified improvements in playgrounds as the reason behind increased satisfaction.
- Residents also reported high satisfaction with kerbside rubbish collection, with the increase in kerbside collection satisfaction possibly being attributed to the July 2024 four-bin rollout.

RECOMMENDATIONS

That the Committee:

a) **Notes the** Residents' Opinion Survey results 2025-2026.

BACKGROUND

4 The purpose of conducting the DCC ROS is to:

a) gauge the extent to which Council is meeting its Long-Term Plan and Annual Plan objectives.

b) measure residents' satisfaction with the services, facilities, and infrastructure Council provides to the community.

c) identify areas for improvement that would be valued by residents.

5 The DCC has conducted the Residents' Opinion Survey since 1994 to monitor community satisfaction with Council services, facilities, infrastructure and performance. Results inform Council planning, service improvements and reporting against Levels of Service in the Long Term Plan.

6 As part of the development of the 10 Year Plan 2027-37, Council is reviewing its Levels of Service. The ROS questionnaire will be checked for alignment with any updated LoS upon the adoption of the plan.

7 The 2025-26 survey received 1,205 responses, representing an 11.3% response rate. Results are weighted to reflect Dunedin's population and have a margin of error of ±2.8% at the 95% confidence level.

DISCUSSION

Clarification of terms

8 'Statistically significant' means a result is unlikely due to a random chance in sampling and is likely due to some factor of interest (e.g. a meaningful change that requires attention). In this report, the word 'significant' specifically refers to statistical significance and does not mean 'large' or that the matter is of more importance or interest to the community.

9 It is helpful to understand that there is a strong relationship between determining what is statistically significant, the sample size and margin of error. As the sample size increases, the margin of error (i.e., uncertainty) decreases. This is why, in a large sample size, a small percentage change could be deemed as significant because the level of uncertainty (margin of error) is small. The change (even if it is small) is deemed significant as the change is likely due to a factor of interest. On the other hand, in a smaller sample size, a large change may fail to be deemed significant due to a greater level of uncertainty.

10 Throughout the report, an upward arrow (^) is used to indicate a net result that is statistically higher than that of 2024-25, while a downward arrow (v) is used to flag a net result that is statistically lower than that result in 2024-25. Caution is needed when considering any other increase or decrease in satisfaction ratings that are not statistically significant.

Summary of findings

11 Overall Council satisfaction was 41%. The survey identified perceived value for money, leadership, planning and urban design, and roading infrastructure as the areas most strongly associated with overall satisfaction.

12 Satisfaction levels across key service areas were:

Service area	Satisfaction
Parks, reserves, and open spaces	86%
Sports and recreation facilities	79%
Cultural and creative facilities	78%
Waste management	71%
Planning and urban design	60%
Regulatory services	56%
Water infrastructure	49%
Roading, footpaths, lighting and parking	34%

13 The survey also identified several matters of interest:

- **Value for money:** Property owners reported lower satisfaction (28%) than non-property owners (36%).
- **Water infrastructure:** South Dunedin residents reported lower satisfaction (34%) than the citywide result (49%), particularly in relation to stormwater.
- **Accessibility:** Residents with mobility difficulties reported lower satisfaction with the central city, particularly the condition of footpaths.
- **Service improvements:** Residents recognised improvements to playgrounds and kerbside rubbish collection.

14 When asked to identify Council priorities, residents most frequently mentioned roading and transport (26%), spending and financial management (20%), and rates and affordability (17%).

15 The results provide insights into residents' priorities and experiences and will inform ongoing service delivery, performance monitoring and future planning. The full survey results, including year-on-year comparisons, are provided in Attachment A.

OPTIONS

16 There are no options as this is a report for noting.

NEXT STEPS

17 The 2025-26 ROS Annual Report (Attachment A) will be uploaded onto the DCC website following this committee meeting.

18 Enlighten Me Research will continue to deliver the ROS monthly sampling for the 2026-27 survey.

19 Staff will work with Enlighten Me Research to provide quarterly ROS updates to Council via Policy and Planning Committee meetings, as scheduled in its Forward Work Programme.

Signatories

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Authoriser:	Nicola Morand - Manahautū (General Manager Community and Strategy)

Attachments

	Title	Page
⇩A	DCC Residents' Opinion Survey 2025-26 Annual Report	156

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 interests of communities in the present and for the future.
This decision promotes the economic interests of communities in the present and for the future.
This decision promotes the environmental interests of communities in the present and for the future.
This decision promotes the cultural interests of communities in the present and for the future.

Fit with strategic framework

	Contributes	Detracts	Not applicable
Social Wellbeing Strategy	✓	☐	☐
Economic Development Strategy	✓	☐	☐
Environment Strategy	✓	☐	☐
Arts and Culture Strategy	✓	☐	☐
3 Waters Strategy	✓	☐	☐
Future Development Strategy	✓	☐	☐
Integrated Transport Strategy	✓	☐	☐
Parks and Recreation Strategy	✓	☐	☐
Other strategic projects/policies/plans	✓	☐	☐

The ROS contributes to all aspects of the strategic framework as it gauges residents' opinions on the DCC facilities, services, and infrastructure; overall performance; and perceptions of Ōtepoti Dunedin.

Māori Impact Statement

The 2025-26 ROS did not qualify to receive Māori descent electoral roll data under section 112 of the Electoral Act 1993. This data would enable more accurate representation of Māori in the ROS through targeted sampling. Where response rates are not proportional to the Ōtepoti population for Māori the results are weighted to known population distributions based on the 2023 Census data to reduce sample bias.

Sustainability

The ROS asks about residents' perceptions of Ōtepoti Dunedin as a sustainable city, and whether the DCC is a leader in encouraging the development of a sustainable city.

Zero carbon

The ROS has no direct impact on the city-wide and DCC emissions, as greenhouse gas emissions are likely to stay the same. In procuring and awarding the new supplier, the DCC Procurement Emissions Standards Guidance was applied.

LTP/Annual Plan / Financial Strategy /Infrastructure Strategy

One of the objectives of the ROS is to gauge the extent to which Council is meeting its Long Term Plan and Annual Plan objectives. The ROS asks about residents' satisfaction with the 'value for money' of the services provided by the DCC.

Financial considerations

There are no direct financial considerations.

SUMMARY OF CONSIDERATIONS
Significance The significance of this report is low, in terms of Council's Significance and Engagement policy, as it is for noting only.
Engagement – external The ROS is a form of external engagement that allows the DCC to create community-informed improvements.
Engagement - internal Reporting of ROS results will be considered as part of future work on non-financial reporting, levels of services, and community-informed feedback.
Risks: Legal / Health and Safety etc. There are no known risks.
Conflict of Interest There is no conflict of interest.
Community Boards ROS result breakdowns are available at a community level, which includes Community Board areas.


DUNEDIN CITY COUNCIL | kaunihera a-rohe o Ōtepoti
RESIDENTS' OPINION RESEARCH
Annual Report 2025-26
Prepared by
EnlightenMe
August 2026

ABOUT THIS RESEARCH

Executive Summary

OVERALL SATISFACTION REMAINS SUBDUED

Satisfaction with the Council sits at 41%, down from 48% in 2024-25 and only just above the 2020-21 low of 40%. A dip around the October 2025 election pulled the year's figure down, with results back in the mid-40s either side of it. Perceived value for money is the strongest single driver of the overall result, and it has fallen to a recent low of 30% after two years of large rates rises.

PERCEIVED VALUE FOR MONEY & LEADERSHIP PRIORITIES

The measures most closely tied to residents' overall view, being perceived value for money and how the Council is led and run, are also where satisfaction is weakest. All five leadership measures stepped down around 2020-21 and have stayed low since, lifting briefly around the 2025 election before easing again. Parks and waste management score highest, though they impact the overall result the least.

STRONGEST ON AMENITIES, WEAKEST ON INFRASTRUCTURE

Residents rate community facilities highly, with parks, reserves, and open spaces at 86%, sports and recreation at 79%, and creative and cultural facilities at 78%, though these are lower impact drivers. Core infrastructure rates lowest, being roading at 34% and water at 49%, and it is among the biggest service level drivers. Lifting the overall picture means making progress where residents are hardest to satisfy, particularly stormwater and flood resilience and the condition of the roads.

CHANGES RESIDENTS NOTICED

Two service changes were highlighted by residents this year. Playgrounds have turned around after years of falling satisfaction, and in unprompted, open-ended feedback, residents put it down to the upgrades and new builds. Kerbside rubbish collection is up too, the only waste measure to shift, and the four-bin rollout in July 2024 is the obvious reason.

PRESSURE POINTS

Stormwater and flooding drag the water related infrastructure score down, with residents of South Dunedin feeling this most acutely. Congestion, parking, and road condition drive dissatisfaction with roads, and parking enforcement is the sticking point in regulatory services. Where residents contact Council staff, the people are a strength, friendly, clear, knowledgeable, and quick to understand what's needed, but keeping residents informed on progress afterwards is where the biggest opportunity lies.

HOW RESIDENTS SEE THE CITY

Dunedin's identity as a heritage and cultural city is strongly felt, and its well-regarded venues back that up. Confidence in the city as a thriving, productive economy is more muted, and it sits close to how residents view the Council's leadership.

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ABOUT THIS RESEARCH

Research Objectives & Methodology

Research objectives:

Dunedin City Council has commissioned its Residents' Opinion Survey since 1994. The monthly survey measures how residents use and experience the Council's facilities, services, and infrastructure, and how they feel about the city and the Council's leadership.

For 2025-26, the questionnaire was revised to align with a number of Council's levels of service and the community outcome measures adopted in the Long Term Plan.

The objectives of the research are to:

- Measure residents' satisfaction with the Council's facilities, services, and infrastructure.
- Provide evidence against the Council's Long Term Plan and Annual Plan performance measures.
- Understand how often residents use Council facilities, and which parts of the city that use happens in.
- Identify the improvements that matter most to residents.

Methodology:

The Residents' Opinion Survey runs continuously throughout the year. Each month residents aged 18 and over are randomly selected from the electoral roll, stratified so the sample reflects how the city's population is distributed geographically, and benchmarked against 2023 Census data. Everyone selected receives an invitation letter in the mail with a unique code to complete the questionnaire online, and paper or translated copies are available on request. Everyone who completes the survey goes into a monthly draw for a $100 voucher. A breakdown of the invited sample by area is in the appendix.

Across the year we sent 10,650 invitations and received 1,205 completed responses, a response rate of 11.3%. This year we moved to a single monthly mailout with no reminders, as reminders draw a lower response for the same print and postage cost, and focusing on initial invitations generates more completed surveys for the money spent. Response rates reported in previous years were calculated on first invitations alone and did not count reminders, so are not comparable.

From April to June 2026 each invitation also carried a household leaflet with additional unique codes, so that other adults in the household could take part.

Results in this report are weighted by age, gender, and ethnicity so they reflect the Dunedin adult population. Figures are rounded, so percentages may not sum to 100%.

Full technical notes, including sampling, margin of error, weighting, and significance testing, are in the appendix.

ABOUT THIS RESEARCH

What Changed This Year

1. **Facility ratings now come from recent users only.** Satisfaction with a facility is asked only of residents who have visited it in the last 12 months, so each rating reflects direct and current experience.

2. **We now ask when people last visited.** Residents tell us when they last visited each facility, and anyone who visited within the last month then tells us how many times they visited within that month. People remember the last month far more accurately than a whole year, so figures reported are closer to what actually happened.

3. **Park feedback is tied to specific places.** An interactive map question in the online survey lets residents drop a pin on the park or open space their feedback relates to. Each pin is matched against DCC's GIS data to identify the site, giving the Council park level results wherever the sample supports them.

4. **Every facility has its own comment question.** Comments are attached to the facility they are about, so the Council can see what is driving the score for that specific place.

5. **The rating scale has changed.*** Rating questions now use a 5-point labelled scale, with Don't Know and Not Applicable options. Every point on the scale is described with a word, so residents all read it the same way. Reporting also matches what residents actually chose rather than a scored version of it as in previous years.

6. **Demographic questions have been broadened.** Finer age bands, a fuller ethnicity list with iwi and hapū affiliation, languages spoken, household composition, household income, and validated disability questions all allow deeper analysis of who is being served well and who is not.

** This year's survey moved to a 5-point scale in line with best practice in survey design. Although the scale looks similar to respondents, using the same five labels as before, the change means satisfaction results for 2025-26 form a new baseline and may not be directly comparable with previous years.*



01 The Big Picture

THE BIG PICTURE - OVERALL SATISFACTION

Overall satisfaction down and on par with recent lows

At 41%, overall satisfaction sits just above its 2020-21 low and below the 2017-18 peak of 58%. The annual figure is weighed down by a dip in satisfaction around the October 2025 election, where satisfaction dropped to 33% in October (three months rolling). It then recovered to a peak around April 2026 before easing again, leaving the underlying level in the mid-40s.

Overall satisfaction with Dunedin City Council:

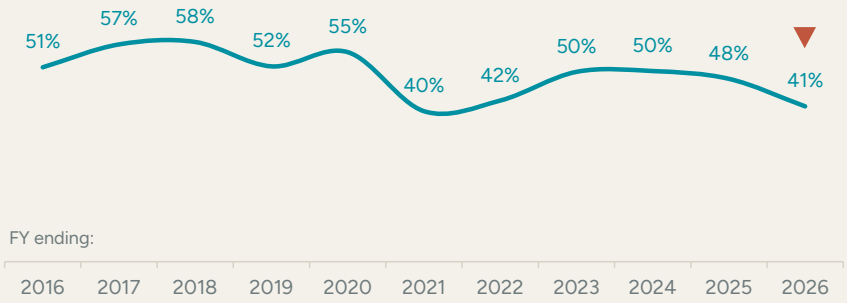


Figure 01: Overall satisfaction with Dunedin City Council.

41% satisfied in 2025-26

down significantly compared to 2024-25. A further 32% are neutral.

A DIP AROUND THE ELECTION-PERIOD

Satisfaction fell to around 33% on a three-month rolling basis around the 2025 election, then recovered steadily to a peak of 51% in early 2026 before settling at 45% by the end of year.

BELOW PRE-COVID

Although improving in the second half of the financial year, satisfaction remains below the mid-50s of the 2015-16 to 2019-20 period.

DRIVEN MOST BY PERCEIVED VALUE FOR MONEY

Perceived value for money is the measure most closely tied to overall satisfaction, and it has followed a similar decline, falling alongside increases in rates.

> *A great place to live, and we need a great council as well.*
> Male, 65+ years, South Dunedin.

Question: Overall, how satisfied or dissatisfied are you with the Dunedin City Council? Base: All respondents who provided a rating, minimum n=805.

THE BIG PICTURE - VALUE FOR MONEY

Perceived value for money has fallen

At 30%, 2025-26 is the lowest perceived value for money result in recent times, down from a 54% peak in 2017-18. The decline has come alongside sustained rates increases, including two large rises in the last two years, though the 2025-26 figure is also pulled down by a lower scoring first half of the year.

Satisfaction with perceived value for money:

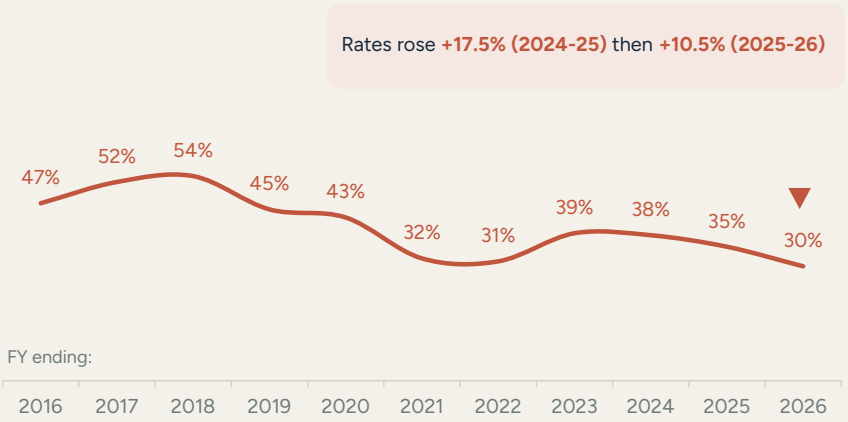


Figure 02: Satisfaction with perceived value for money.

30% satisfied in 2025-26

down significantly compared to 2024-25. A further 28% are neutral.

ALONGSIDE RISING RATES

The fall has come during several rates increases, stepping up sharply in the last two years (17.5% then 10.5%). The two move together closely.

A DIP, THEN RECOVERY WITHIN THE YEAR

Like overall satisfaction, perceived value for money was weakest around the election (around 25%, three months rolling), recovering to the high-30s towards the end of 2025-26, broadly back in line with 2024-25.

THE STRONGEST DRIVER OF SATISFACTION

Value for money is the measure most closely tied to residents' overall satisfaction with Dunedin City Council.

> *My rates are going up and up, what feels like every month, but the services I receive have not changed.*
> Female, 50 - 54 years, Mosgiel.

Question: Overall, how satisfied or dissatisfied are you with the value for money? Base: All respondents who provided a rating, minimum n=792.

THE BIG PICTURE - VALUE FOR MONEY

Residents see higher rates but feel no more to show for them

Residents' concern about value is twofold – rates keep rising, and they don't feel they get any more for it. Where people are satisfied, it's a broader sense that the city delivers decent services for its size, with the water and drainage renewals, parks and rubbish collection the everyday things people point to as worth the rates.

Why residents are dissatisfied with value for money:

1. **RATES TOO HIGH & RISING ~ 4 in 10**
   Rates are described as expensive and climbing every year, outpacing incomes and pensions. Some residents point to regional rates too.
2. **WASTEFUL/POORLY MANAGED SPENDING ~ 3 in 10**
   Waste, debt and "bureaucracy"/management costs – some residents call for money to be spent more "wisely and accountably".
3. **MONEY SPENT ON THE 'WRONG THINGS' ~ 2 in 10**
   Specific projects named as nice-to-haves ahead of essentials, including cycleways, the stadium, and the George Street upgrade.
4. **ROADS & INFRASTRUCTURE ~ 2 in 10**
   A sense that basics like roads, footpaths, and water pipes are under-maintained and, for some, that this persists despite rising rates.
5. **AFFORDABILITY & STRUGGLE ~ 1 in 10**
   Some raise rates as a genuine financial strain, with residents naming pensions, single incomes, and the cost of living.

Note: Themes coded from open-ended comments; proportions indicative. Many comments raise more than one theme, so figures do not sum to 10.

> *"Rates are going up but we don't seem to get anymore for our money."*
> Female, 20 - 24 years, Peninsula.

> *"Council needs to spend on needs rather than nice to have."*
> Female, 65+ years, South Dunedin.

> *"Rates are up, but what for? Have we ever been given a breakdown of where our money goes?"*
> Male, 45 - 49 years, Hill Suburbs.

> *"Rates are too expensive, especially for single parents and retirees."*
> Female, 65+ years, area not stated.

> *"Rate rises are outrageous and far exceed the rate of inflation."*
> Female, 45 - 49 years, North Dunedin.

> *"The rubbish collection service is frustrating for the rates increase. Other facilities are great."*
> Female, 30 - 34 years, Kaikorai Valley.

> *"Too much money gets wasted on vanity projects and consultants."*
> Male, 45 - 49 years, North Coast.

Question: What are your top two priorities for the DCC this year?
Base: All respondents who provided a rating, Priority 1 n=1079, Priority 2 n=1029.

THE BIG PICTURE - COUNCIL LEADERSHIP

Leadership matters most and eased across the board this year

After value for money, leadership and direction are the strongest drivers of overall satisfaction. All five measures sit low compared to the services and facilities council provides, and each eased in 2025-26 as the lift around the new Council settled. Around 4 in 10 residents are neutral on most leadership measures, rising to nearly half for Community Boards.

25%
OVERALL PERFORMANCE: MAYOR & COUNCILLORS
▼ -5 vs 2024-25

35%
OVERALL PERFORMANCE: COMMUNITY BOARD MEMBERS

30%
AMOUNT OF PUBLIC CONSULTATION
▼ -6 vs 2024-25

30%
ECONOMIC DEVELOPMENT
▼ -6 vs 2024-25

46%
SUPPORTING FESTIVALS & EVENTS
▼ -10 vs 2024-25

Question: How satisfied or dissatisfied are you with each of the following? And overall, when you think about the role that Council has, how would you rate your overall satisfaction with the performance of the elected members? Base: All respondents who provided a rating, minimum n=807.

25% satisfied in 2025-26

with the Mayor and Councillors, down significantly compared to 2024-25.

THEY MOVE AS ONE

All five leadership measures track each other year to year, acting as a single confidence signal that stepped down around 2020-21 and hasn't recovered.

A LIFT AROUND THE ELECTION, THEN A FADE

All five measures share the same 2025-26 pattern - a trough before the vote, followed by a peak as the new Council took office, then an ease back. This trend is sharpest for Mayor & Councillors and economic leadership.

WHY IT WEIGHS ON THE OVERALL RESULT

These measures are the strongest drivers of overall satisfaction and value for money, so a drop in scores here impacts the perception of Dunedin City Council as a whole.

LEADERSHIP AND VIEWS OF THE CITY MOVE TOGETHER

Confidence in leadership is closely linked to how residents view Dunedin itself. Residents satisfied with economic leadership are more likely to see a thriving, vibrant city.

THE BIG PICTURE - COUNCIL LEADERSHIP

Confidence in elected members moves with the overall mood

Satisfaction with the Mayor & Councillors and with Community Board members has followed the same path over the years – steady through the late 2010s, a step down around 2021, and a similar trend since. Both measures eased again in 2025-26.

Satisfaction with the performance of elected members:

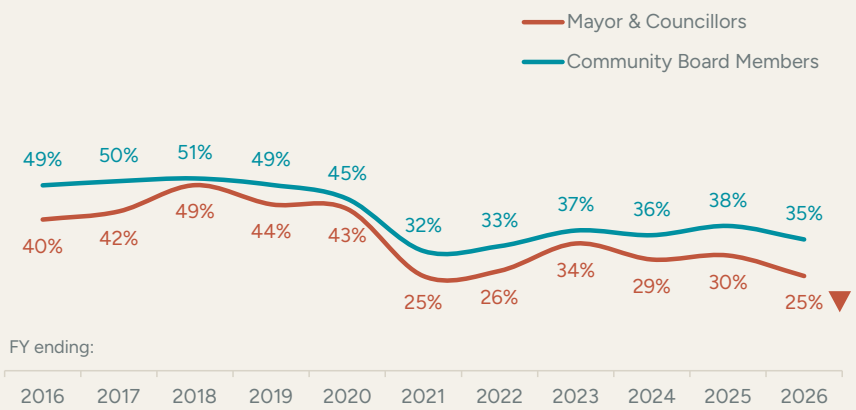


Figure 03: Satisfaction with the performance of elected members.

25% satisfied in 2025-26

with the Mayor and Councillors, the lowest since 2020-21.

BOTH STEPPED DOWN AND STAYED DOWN

Confidence in both elected tiers fell sharply around 2021 and has held at that lower level ever since. This is a structural shift and 2025-26 sits at or near the series low for both.

COMMUNITY BOARDS HELD UP BETTER

Throughout, satisfaction with Community Board members has sat above that with the Mayor & Councillors, and fell less this year.

SAME PATTERN ACROSS LEADERSHIP MEASURES

These two measures stand for the wider picture – all five, including economic leadership, public consultation, and festivals, follow the same path, moving together year to year. Whichever aspect of leadership residents are asked about, confidence has shifted as one.

Question: And overall, when you think about the role that Council has, how would you rate your overall satisfaction with the performance of the elected members? Base: All respondents who provided a rating, minimum n=589.

THE BIG PICTURE - WHAT MATTERS MOST

The measures that matter most are the ones scoring lowest

The things residents care about most when judging the Council, being value for money and how Council is led and run, are also the areas where satisfaction is lowest. The services that score best, like parks and waste, matter least to the overall result. Improving the overall picture means making progress where residents are hardest to satisfy.

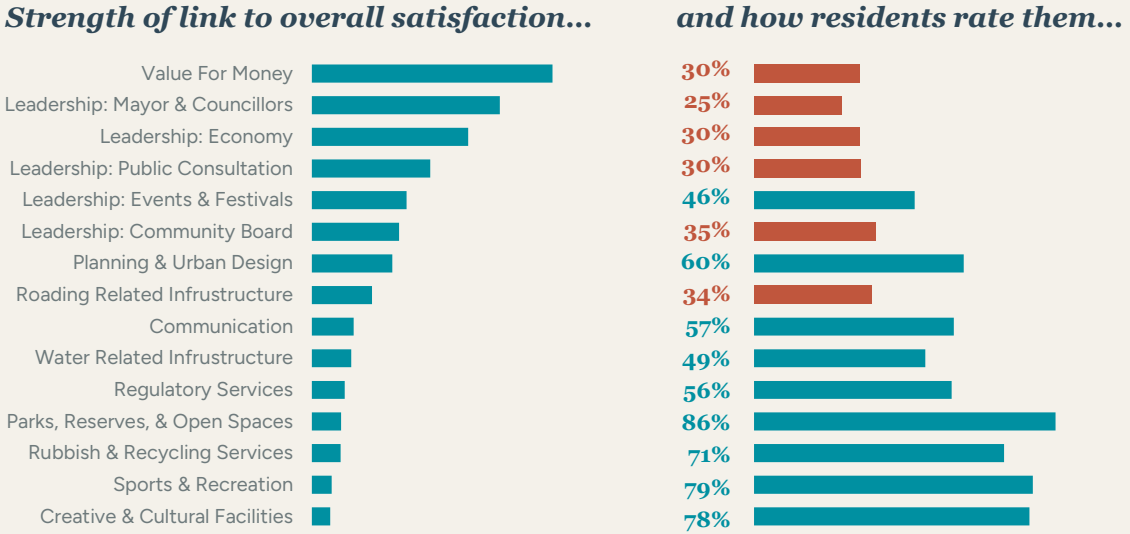


Figure 04: Strength of link of specific measures to overall satisfaction, and how residents rate them.

Value & Direction

Value for money shapes overall satisfaction more than anything. After value, Council governance and direction measures matter most. These are about how the Council is run, rather than the services it delivers.

THEY SCORE LOWEST

These top drivers sit at the bottom for satisfaction – the things residents care about most in forming their overall view are where they're least satisfied.

DRIVERS OF VALUE FOR MONEY

Among the aspects measured, the same areas that shape overall satisfaction, being leadership and how the city is developing, also most shape perceived value for money.

> *"Focus on core services first.*
> Male, 65+ years, area not stated.

The "strength of link" is based on a regression analysis (n=571; R^2=0.70) identifying which measures are most strongly associated with residents' overall satisfaction. It shows relative importance, not cause.

THE BIG PICTURE – CITY PERCEPTIONS

A creative, heritage city, though residents less sure it's thriving

Residents hold a strong, positive sense of Dunedin's identity, its heritage, arts and natural environment. They are less convinced it is a thriving, productive economy, and while residents see the city as sustainable, few credit the Council with leading on it.

72% agree

(or strongly agree) Dunedin preserves architectural history.

A STRONG SENSE OF IDENTITY

Residents most agree Dunedin is a place of heritage, arts and culture, diversity, and natural environment.

LESS SURE IT'S THRIVING

While residents are positive about the city's heritage, culture, and environment, confidence in its economic direction is more muted.

A GAP ON SUSTAINABILITY

Many see Dunedin as an environmentally sustainable city, but far fewer see the Council as leading on it.

> *I do think Dunedin is a vibrant city but believe this comes from the people, not the council.*
> Female, 30 - 34 years, Wakari.

Agreement that Dunedin...



Figure 05: Agreement with perceptions of Dunedin.

Question: Overall, how strongly do you agree or disagree with the following? Base: All respondents who provided a rating, minimum n=1077.

THE BIG PICTURE - WHAT RESIDENTS WANT

Roads, rates, and careful spending top the priority list

Roading and transport is the most mentioned priority overall, with spending, rates and financial management close behind, and especially likely to be a resident's number one priority. Core infrastructure like water features strongly, while events, arts and heritage rank lower, and more often as a second priority than a first.

Residents' top priorities for the DCC this year:

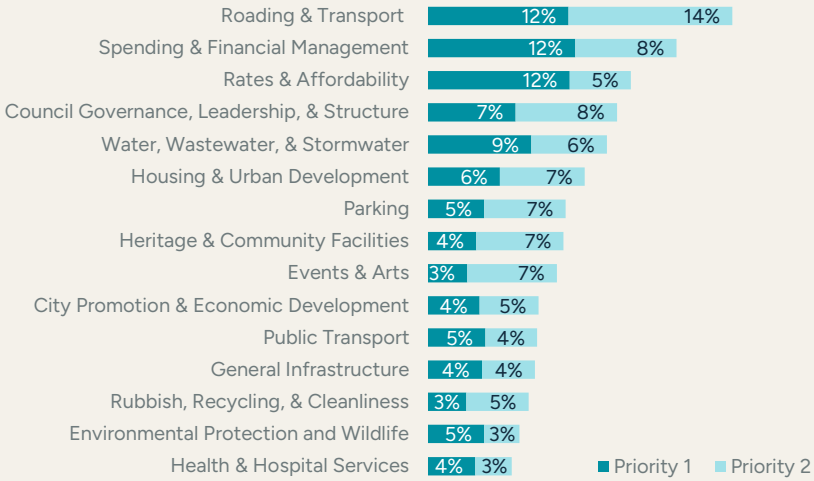


Figure 06: Residents top priorities for the year.

> *Start listening to the people and apply common sense.*
> Female, 45 - 49 years, North Dunedin.

> *The traffic is an absolute disgrace.*
> Female, 50 - 54 years, Mosgiel.

> *Spend less money on pavers and seesaws. Spend more money on water and roading infrastructure.*
> Male, 20 - 24 years, North Coast.

> *Stop wasting ratepayers money.*
> Female, 65+ years, South Coast.

> *Improve the bus routes, frequency and affordability.*
> Female, 30 - 34 years, South Dunedin.

> *Sort stadium costs, stop getting rid of parking, fix important stuff before cycle ways.*
> Male, 50 - 54 years, North Dunedin.

> *We need more car parking, or at least the current car parks not to be so expensive.*
> Female, 25 - 29 years, area not stated.

Question: What are your top two priorities for the DCC this year? Base: All respondents who provided a rating, Priority 1 n=1079, Priority 2 n=1029.



02 Six Standout Stories

Six Standout Stories

01

VALUE FOR MONEY

At a recent low and property owners feel it most.

02

LEADERSHIP

A lift in satisfaction with leadership under the new Council has since eased.

03

SOUTH DUNEDIN

Dissatisfaction focused on stormwater and flood infrastructure.

04

GEORGE STREET

A better place to walk since the upgrade, but with questions over cost.

05

WHERE EXPERIENCES DIFFER

One resident profile – working, car dependent property owners – are consistently less satisfied.

06

GETTING AROUND THE CITY

The physical central city retail area and footpaths are lacking for less mobile residents.

STORY 01 - VALUE FOR MONEY

Perceived value for money has dropped most for property owners

Value for money is the lowest scoring and most influential measure, and property owners are feeling it the most. Property owners once rated value for money the same as non-property owners, however a gap has opened as rates rose, and owners are now markedly less satisfied with perceived value for money than non-owners.

Satisfaction with perceived value for money:

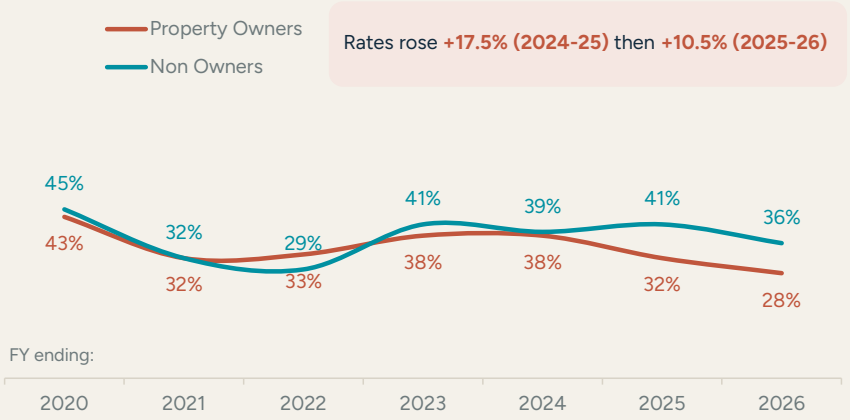


Figure 07: Satisfaction with perceived value for money.

8 point gap

A NOTABLE GAP

Property owner satisfaction with value for money has declined since 2023-24, creating a gap between owner and non-owner perceptions.

AS RATES CLIMBED

The decline in satisfaction with value has come during a period of rising rates, where rates stepped up 17.5% in 2024-25, and 10.5% in 2025-26.

PROPERTY OWNERS LESS SATISFIED OVERALL

Value for money is one of the strongest drivers of overall satisfaction, and property owners report lower overall satisfaction than non-owners.

WHAT MATTERS MOST

Rates and council spending was named frequently as priorities for DCC, with owners mentioning this more often than non-owners.

> *Council needs to spend on needs rather than nice-to-have.*
> Female, 65+ years, South Dunedin.

Question: Overall, how satisfied or dissatisfied are you with the value for money? Base: All respondents who provided a rating, owners minimum n=611, non-owners minimum n=149.

STORY 02 - LEADERSHIP PERCEPTIONS

New Council sees early lift in satisfaction, then easing

Satisfaction with the Mayor and Councillors fell to a low around the October 2025 election, rose sharply as the new Council took office, then eased back after a few months. Other leadership measures, such as council's leadership to foster a vibrant economy through supporting the city's economic development in general, follow a similar trend.

Satisfaction with Mayor and Councillors (3 months rolling):

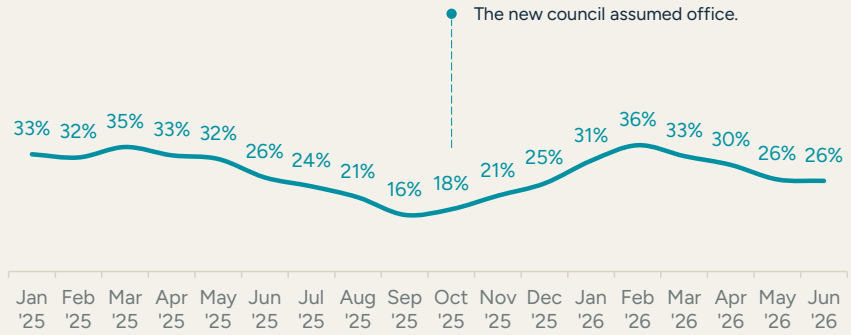


Figure 08: Satisfaction with Mayor and Councillors (three months rolling).

Question: And overall, when you think about the role that Council has, how would you rate your overall satisfaction with the performance of the elected members? - The overall performance of the Mayor and Councillors. Base: All respondents who provided a rating, minimum n=205.

36% peak

up from 16% in September 2025, followed by a drop to 26% by June.

A LIFT AS THE NEW COUNCIL TOOK OFFICE

Confidence fell to a low around the October 2025 election, then rose as the new Council took office, a shape shared by the other leadership measures. Comments suggest the lift may have been prompted by the idea of a fresh start rather than a change residents had seen.

EASING SINCE FEBRUARY

Since the February peak, satisfaction with the Mayor and Councillors has eased back to 26%.

A CALL TO WORK TOGETHER

Residents' feedback focuses mostly on how elected members work together, with many asking to stop fighting and get on with the job.

> *I wish the few elected city councillors would stop fighting and grow up. It's not about them, it's about serving your city.*
> Female, 60 - 64 years, Wakari.

STORY 03 - SOUTH DUNEDIN

A stormwater gap in the flood-exposed south

Residents in South Dunedin are significantly less satisfied with the management of water infrastructure than others. Flooding features in roughly a third of their comments, and where the rest of the city tends to describe a service to be managed better, South Dunedin residents speak of a lived and present concern.

Satisfaction with water related infrastructure:

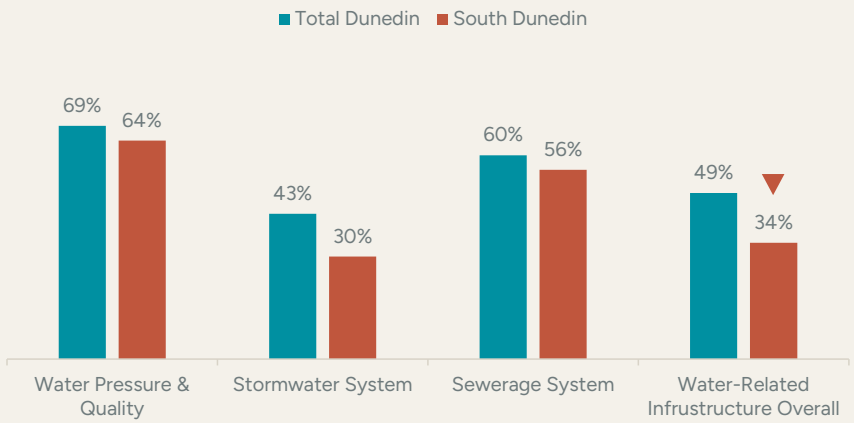


Figure 09: Satisfaction with water related infrastructure.

Question: How satisfied or dissatisfied are you with each of the following? Question: Overall, how satisfied or dissatisfied are you with the way the DCC provides and manages the city's water-related infrastructure?
Base: All respondents who provided a rating, Total Dunedin minimum n=1075, South Dunedin minimum n=134.

15 point gap

A SIGNIFICANT, TARGETED GAP

On overall water infrastructure management, 34% of South Dunedin residents are satisfied vs. 49% citywide – a statistically significant 15-point gap.

CONCENTRATED ON STORMWATER

Stormwater shows the biggest gap, while other water related measures, and satisfaction with council overall, sit closer to the city average.

A LIVED CONCERN, NOT JUST A SERVICE ISSUE

Across the city, residents want the basics managed better – meaning drains cleared and pipes renewed. In South Dunedin that comes with something the rest of the city voices far less – the lived, repeated experience of flooding itself.

> *"I live in South Dunedin, the flood issues are a constant concern and none of the options to mitigate the risk are satisfactory.*
> Male, 40 - 44 years, South Dunedin.

STORY 04 - GEORGE STREET

George Street a better street to walk, with questions over cost

Satisfaction with the central city retail area and ease of pedestrian movement rose around the rebuild of George Street in 2024-25, and have held strong into 2025-26, with many still positive about the upgrade. George Street is commonly mentioned, with the look and feel tending to be praised, and cost being a recurring concern.

Satisfaction with aspects relating to George Street upgrade:

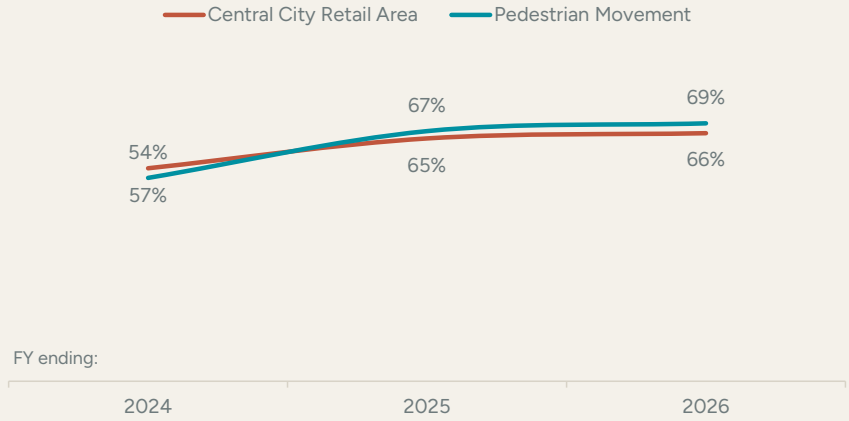


Figure 10: Satisfaction with aspects relating to George Street upgrade.

Question: How satisfied or dissatisfied with the overall look and feel of the following? - The central city retail area. Question: How satisfied or dissatisfied are you with each of the following? - The ease of pedestrian movement throughout the city. Base: All respondents who provided a rating, minimum n=1184.

1/3 mention George Street

or the main street upgrade unprompted.

WHAT LIFTED

Satisfaction with the central-city retail area and walkability throughout the city rose around the rebuild and have held strong into 2025-26.

LIKED AS A PLACE, QUESTIONED AS SPEND

Some praise the street as a place to be, with walkability and look positively mentioned by most residents. Others see mainly "money wasted".

THE FACE OF THE VALUE DEBATE

The see-saws and boulders have become what residents reach for to talk about "waste". This is where a general concern about Council spending finds something concrete to point at.

> *George Street is much more pedestrian friendly now.*
> Male, 50 - 54 years, Wakari.

> *Money wasted on vanity projects such as the see saw on George Street.*
> Female, 50 - 54 years, North Coast.

STORY 05 - WHERE EXPERIENCES DIFFER

One group is consistently less satisfied with value and direction

Working (full time or self employed), car dependent property owners are consistently less satisfied than others. Not so much with the everyday services they use, but with perceived value for money, leadership, and how the Council is run. They are also less likely to view Dunedin City as vibrant and thriving.

Satisfaction with aspects of value and leadership:

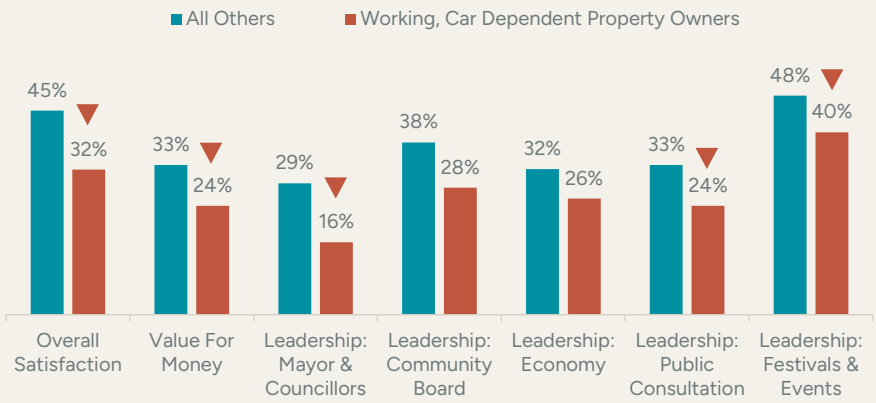


Figure 11: Satisfaction with aspects of value and leadership.

Question: Overall, how satisfied or dissatisfied are you with the Dunedin City Council? Question: Overall, how satisfied or dissatisfied are you with the value for money? Question: How satisfied or dissatisfied are you with each of the following? Question: And overall, when you think about the role that Council has, how would you rate your overall satisfaction with the performance of the elected members? Base: All respondents who provided a rating, All Others minimum n=543, Working, Car Dependent Property Owners minimum n=264.

32% vs 45%

property owning, car dependent, full time working residents significantly less satisfied overall compared to all other residents.

CRITICAL WHERE IT COUNTS MOST

The gaps fall on the measures that most drive overall satisfaction – perceived value for money, leadership, public consultation, how the city is developing, and roads. On the lower impact everyday services, such as parks, waste, water, sport, and culture, their perceptions are more in line with other residents.

LESS UPBEAT ABOUT THE CITY

They are also less likely to see Dunedin as vibrant and thriving, though they view its heritage and natural environment much like everyone else.

> *Rates are way too high for the facilities we have compared to other cities.*
> Male, 45 - 49 years, Andersons Bay.

STORY 06 - GETTING AROUND THE CITY

The central city is harder for less mobile residents

Residents with mobility difficulties are significantly less satisfied with the central city area compared to those without difficulty, and the condition of footpaths is the standout. For some, uneven and poorly maintained footpaths come through as a barrier to getting around, especially for those using wheelchairs or mobility aids.

Satisfaction with the city centre and footpath condition:

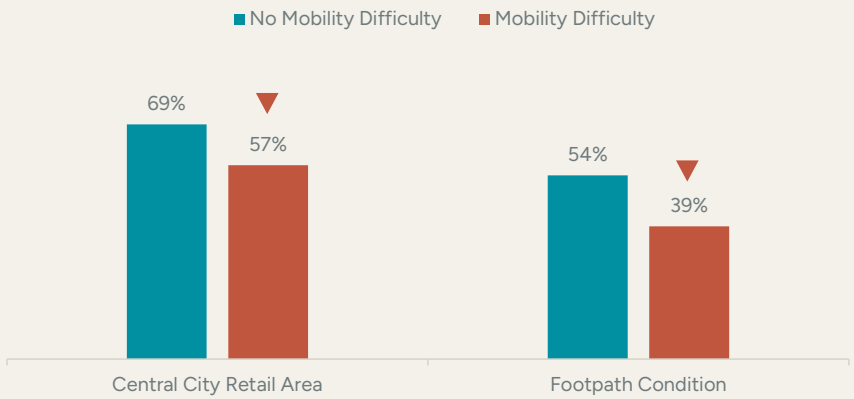


Figure 12: Satisfaction with the city centre and footpath condition.

Question: How satisfied or dissatisfied are you with the overall look and feel of the following? – The central city retail area. Question: How satisfied or dissatisfied are you with each of the following? – Overall condition of footpaths throughout the city. Base: All respondents who provided a rating, No Mobility minimum n=961, Mobility minimum n=191.

15 point gap

on the condition of footpaths for those with mobility difficulties.

AN EQUITY GAP IN THE BUILT ENVIRONMENT

The difference is about physically getting around on uneven footpaths and navigating the central city, not the services they use.

> *Our roads and footpaths are in need of updating - have you ever tried pushing a wheelchair? It is not easy.*
> Female, 60 - 64 years, South Dunedin.

GEORGE STREET SHOWS IT CAN IMPROVE

Some residents single out the rebuild as easier to use, evidence that upgrades can widen access for everyone.

> *The George Street upgrade is great, especially for a person with a disability.*
> Female, 50 - 54 years, Green Island.



03 Changes Residents Noticed

CHANGES RESIDENTS NOTICED

Playground and bin system changes have landed well

Two Council services saw notable changes this year - upgrades to playgrounds, and the new kerbside collection system.

PLAYGROUNDS

+5 percentage points this year

Satisfaction recovered after a decline.

After several years at its lowest levels, satisfaction with playgrounds rose notably, though not significantly from 65% to 70%. Residents point to recent playground upgrades and new builds across the city.

KERBSIDE RUBBISH COLLECTION

+11 percentage points this year

The only waste measure to move this year.

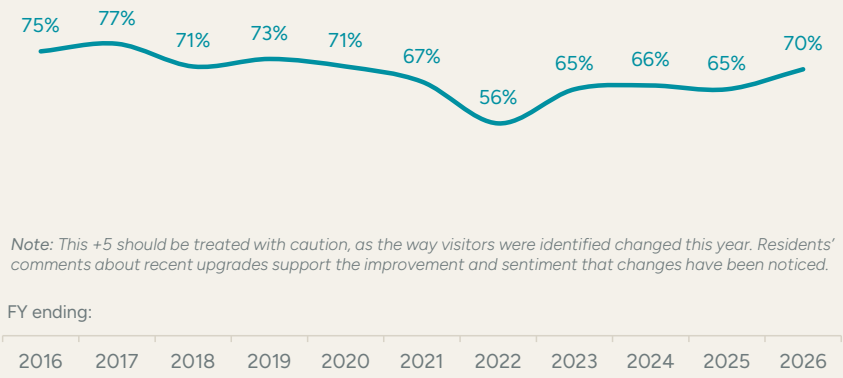
Satisfaction with kerbside rubbish collection rose significantly from 66% to 77%, following the July 2024 rollout of the new four-bin system, which replaced rubbish bags with bins, and added a new green waste bin. No other waste measure shifted significantly this year.

CHANGES RESIDENTS NOTICED – PLAYGROUNDS

The lowest rated facility showed some improvement

DCC playgrounds, the lowest rated aspect of the parks, reserves and open spaces facilities measured this year, have risen to 70% after a steady multi-year decline to a low of 56% in 2021-22. Residents point to recent playground upgrades and new builds across the city as reasons for their satisfaction.

Satisfaction with Dunedin City Council playgrounds:



Note: This +5 should be treated with caution, as the way visitors were identified changed this year. Residents' comments about recent upgrades support the improvement and sentiment that changes have been noticed.

Figure 13: Satisfaction with Dunedin City Council playgrounds .

+5 percentage points

rise in playground satisfaction this year.

A CLEAR DECLINE, NOW RECOVERING

Playground satisfaction fell steadily from the low 70s to a low of 56% in 2021-22 and sat lower for several years. It has since recovered to 70%.

RESIDENTS CREDIT REAL UPGRADES

The improved score tracks visible investment, and residents name new and upgraded playgrounds unprompted as reasons they're more satisfied.

> *Thanks for the new library and the various playground upgrades.*
> Female, 45 - 49 years, South Dunedin.

STILL MORE TO DO

Residents welcome the upgrades but several playgrounds, such as Marlow Park and the Dinosaur Park, are still described as ageing or "tired".

> *Old, dated, boring. Need to hurry up and upgrade the Dinosaur Park.*
> Male, 45 - 49 years, South Dunedin.

Question: How satisfied or dissatisfied were you with each of these facilities that you visited in the last year? - DCC Playgrounds. Base: All respondents who provided a rating, n=678.

CHANGES RESIDENTS NOTICED – RUBBISH COLLECTION

New kerbside collection system appearing to improve satisfaction

In July 2024 the Council rolled out a new four-bin kerbside system, replacing prepaid rubbish bags with a red lid bin and adding a green food scraps and garden waste bin for 52,000 households. In the first full survey year since, satisfaction with kerbside rubbish collection rose significantly.

Satisfaction with the kerbside rubbish collection:

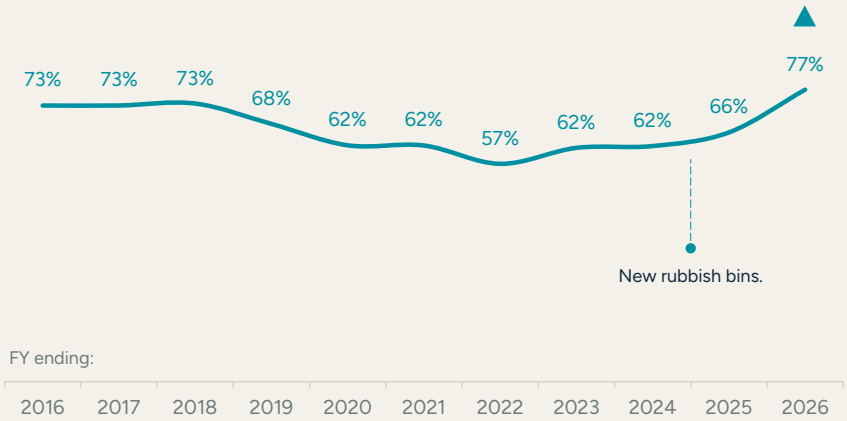


Figure 14: Satisfaction with the kerbside rubbish collection.

+11 percentage points

in one year - kerbside rubbish collection rose from 66% to 77%.

WHAT CHANGED

Prepaid rubbish bags were replaced with a red lid rubbish bin, and a new green lid bin was added for food scraps and garden waste. Rolled out to more than 52,000 households with an updated app.

RESIDENTS RESPONDED

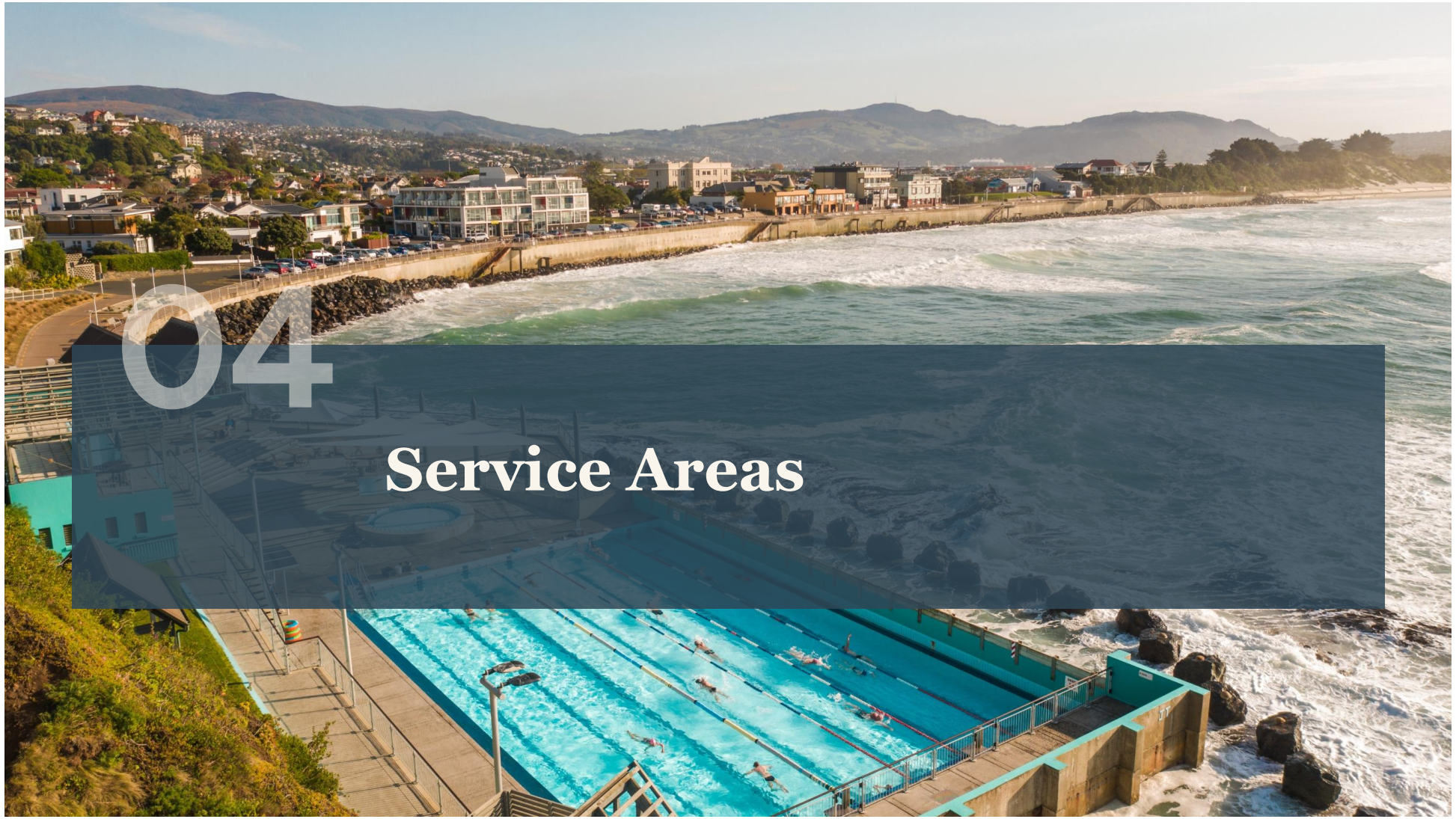
Satisfaction with kerbside rubbish collection rose 11 percentage points, the only rubbish and recycling measure to move.

WHAT THEY VALUE

The move from bags to bins and the new green food bin draw praise. The main criticism is the size of the red rubbish bin being too small.

> *"Worked out better than we expected. Better having bin than bags as bins can't be ripped, spilling rubbish onto street."*
> Female, 50 - 54 years, Green Island.

Question: How satisfied or dissatisfied are you with each of the following services? - Kerbside rubbish collection. Base: All respondents who provided a rating, n=1177.



04 Service Areas

SERVICE AREAS

DCC rates highest on amenities and lowest on infrastructure

Satisfaction is highest for the amenities residents enjoy, being parks, sport, and culture, and lowest for roading and water related infrastructure. The low scoring services are among the biggest drivers of residents' overall view of the Council and the value they receive.

Satisfaction with Dunedin City Council's services:

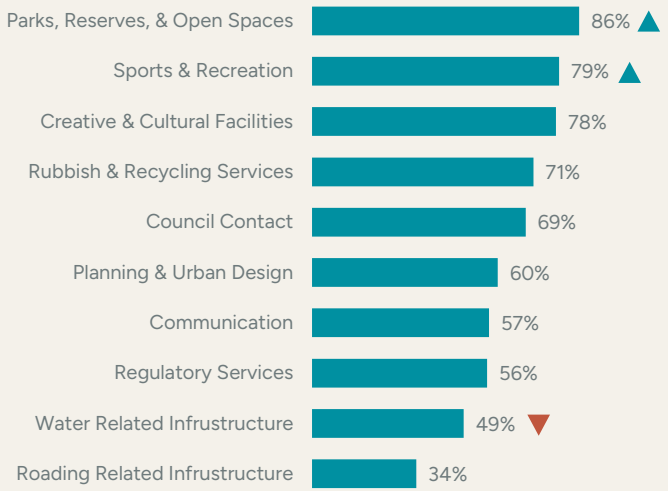


Figure 15: Satisfaction with Dunedin City Council's services.

Amenities Lead

VALUED, BUT NOT WHERE THE GAP IS

Amenities are a genuine strength to maintain, but the opportunity to lift the overall picture sits with roading, water, and how the Council is seen to be run.

SERVICES DRIVING OVERALL SATISFACTION TRAILING

Roading and water sit at the bottom yet are among the strongest drivers of overall satisfaction. The high scoring amenities move the overall result least.

SOME OF THIS IS EXPECTED

Infrastructure and regulatory services tend to score lower than amenities everywhere, where a reliable water supply or a well-run process is less visible than a park or a pool. Part of the gap reflects the nature of the service, not just performance.

TAKEN FOR GRANTED UNTIL THEY FAIL

Roads, water, and waste are the services people notice most when they go wrong and least when they work. They rarely score highly anywhere, but that's also why they weigh so heavily on residents' overall view – when the basics slip, the whole verdict slips.



SERVICE AREA

Facilities

SERVICE AREA – FACILITIES | PARKS, RESERVES, & OPEN SPACES

Green spaces are well cared for, well used, and well loved

86% SATISFIED OVERALL (n=1,182)

LONG TERM TREND: Around 8 in 10 residents were satisfied each year from 2015-16 to 2019-20. Satisfaction eased to the high-70s in 2020-21 and held there for several years, before lifting significantly to its highest level in the series (86%) in 2025-26.

Visitor satisfaction with each facility:

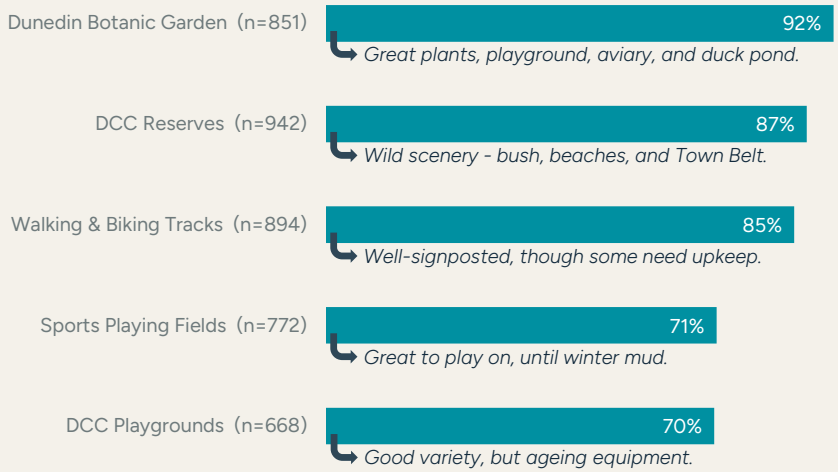


Figure 16: Visitor satisfaction with each facility: Parks, Reserves, and Open Spaces.

Question: How satisfied or dissatisfied were you with each of these facilities that you visited in the last year?

Why visitors gave those ratings:

WHAT RESIDENTS LOVE

Across all five facility types, residents are clear that these spaces are well cared for. Words like "well maintained", "tidy", and "well kept" come up often, and they come up consistently whichever facility is being rated. What residents do in these spaces varies, with walks through the gardens, along the tracks or by the coast, families at the playgrounds, and sport on the fields, but the common theme is having somewhere to get outside and be active.

> *I walk to and from uni every day through these - always well maintained.*
> Female, 18 - 19 years, North Dunedin.

WHAT COULD BE BETTER

Where people were less happy, the complaints are about the basics slipping rather than the spaces themselves. Overflowing or missing bins are the top frustration, followed by dog mess and, in some places, too few toilets. These generally fixable things, and they are often raised by people who otherwise love the place.

> *Well maintained walking track, but no rubbish bins available.*
> Male, 35 - 39 years, South Dunedin.

Note: The way visitors were identified changed this year, comparisons to 2024-25 not made.

SERVICE AREA – FACILITIES | PARKS, RESERVES, & OPEN SPACES

Green spaces used mostly for walking and wellbeing

Walking is the most common activity undertaken at parks, reserves, and open spaces, and improving mental well-being is the most common motivation for visiting. Most visitors visit for a personal reason, to improve wellbeing, connect with nature, or spend time with others, while visiting to actively care for those spaces is less common.

What visitors did on their most recent visit:

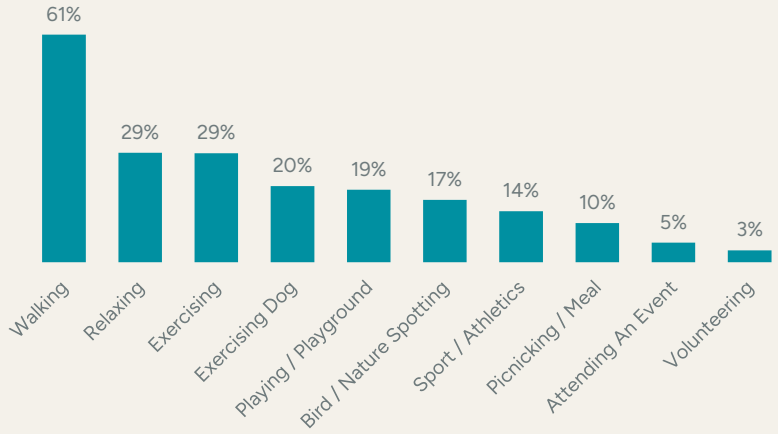


Figure 17: What visitors did on their most recent visit.

Question: What activities did you, or someone you were with, do on your most recent visit to a park, reserve, or open space? Base: All respondents who visited a park, reserve, or open space n=1205.

Why residents visited on their most recent visit:

PERSONAL WELLBEING BENEFIT ON ALMOST EVERY VISIT

86% agree
visited to improve mental well-being

79% agree
visited to connect with nature

76% agree
visited to spend time with others

ACTIVE CARE FOR NATURE ON FEWER VISITS

32% agree
to engage in activities that improve our natural environment

19% agree
to volunteer in activities that improve our natural environment

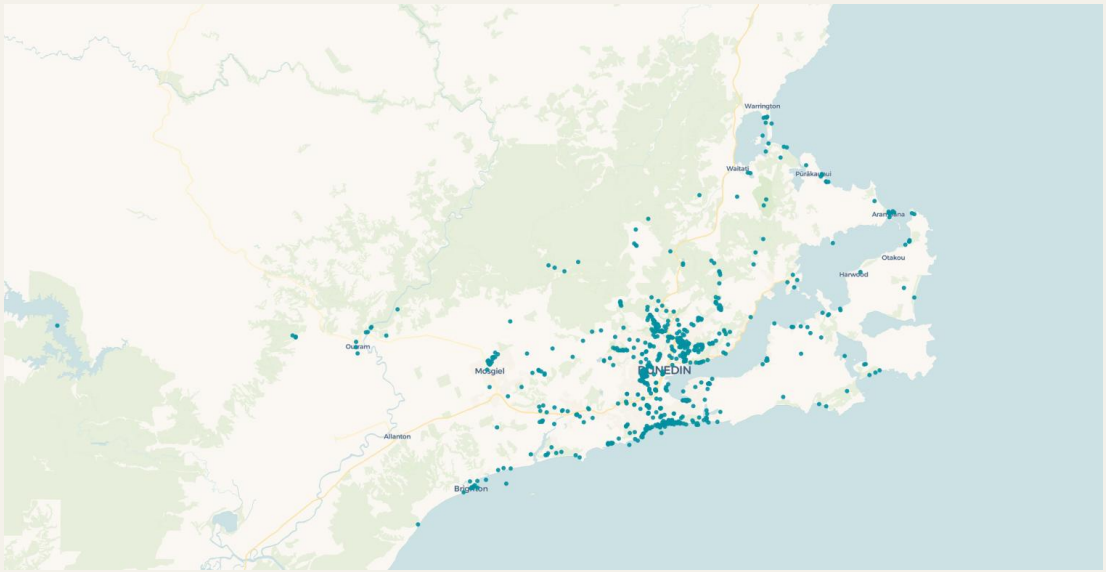
Figure 18: Why residents visited on their most recent visit.

Question: How much do you agree or disagree that each of the following statements were reasons for your most recent visit? Base: All respondents who visited a park, reserve, or open space n=955.

SERVICE AREA – FACILITIES | PARKS, RESERVES, & OPEN SPACES

Parks are visited right across the district

Each dot shows the park a resident visited on their most recent visit. Visits cluster in and around the central city and harbour, but reach across the whole district, from Mosgiel and the coast to the peninsula and northern suburbs.



CONCENTRATED IN THE CENTRE

The densest cluster is central Dunedin and around the harbour, consistent with where most residents live.

BUT GENUINELY DISTRICT-WIDE

Visits extend well beyond the city centre, Mosgiel, the southern coast (St Clair to Brighton), the Otago Peninsula, and northern areas like Waitati and Warrington all feature.

BOTANIC GARDENS MOST POPULAR

The Dunedin Botanic Garden was the most commonly visited park, named by a little over 1 in 10 of those who identified where they went. Ross Creek Reservoir Reserve, Ocean Beach Domain, Marlow Park, and Jubilee Park also featured among the most visited.

Figure 18: The parks residents visited on their most recent visit.

Question: What activities did you, or someone you were with, do on your most recent visit to a park, reserve, or open space? Base: All respondents who visited a park, reserve, or open space n=1205.

SERVICE AREA – FACILITIES | SPORTS & RECREATION FACILITIES

Great experiences in recreation venues that are showing their age

79% SATISFIED OVERALL (n=1,182)

LONG TERM TREND: Satisfaction with sports and recreation facilities overall increased significantly from 75% in 2024-25 to 79% in 2025-26. This follows a period of easing from the low-80s across 2015-16 to 2019-20 down to the mid-70s from 2020-21.

Visitor satisfaction with each facility:



Figure 19: Visitor satisfaction with each facility: Sports and recreation facilities.

Question: How satisfied or dissatisfied were you with each of these facilities that you visited in the last year?

Why visitors gave those ratings:

WHAT RESIDENTS LOVE

Friendly, helpful staff, and the sense that there is something for everyone, with aqua-jogging at Moana Pool, hockey and skating at the Ice Stadium, netball and the book sale at Edgar Centre, and rugby and concerts at Forsyth Barr Stadium.

> *Went for two rugby games in the last month. Very well run, kind staff and exceptionally clean bathrooms.*
> Female, 20 - 24 years, Mosgiel.

WHAT COULD BE BETTER

Older venues are showing their age, with Moana Pool's changing rooms, the Ice Stadium's rink and building, and a cold, leaky roofed Edgar Centre all called for a refresh. At the bigger venues the niggles are cost and logistics, with pricey food and drink at Forsyth Barr Stadium, and parking that divides opinion at Edgar Centre. The same people often call a place great and overdue for care in the same breath.

> *The pool and surrounds looked tired and in need of care.*
> Female, 65+ years, Middlemarch.

Note: The way visitors were identified changed this year, comparisons to 2024-25 not made.

SERVICE AREA – FACILITIES | CREATIVE & CULTURAL FACILITIES

Creative and cultural facilities are Dunedin's most loved venues

78% SATISFIED OVERALL (n=1,138)

LONG TERM TREND: Satisfaction with Dunedin creative and cultural facilities overall sat around 9 in 10 through to 2019-20, then drifted gradually down over the following years. Unlike other facilities, it eased again in 2025-26 to 78% - the lowest in the series.

Visitor satisfaction with each facility:

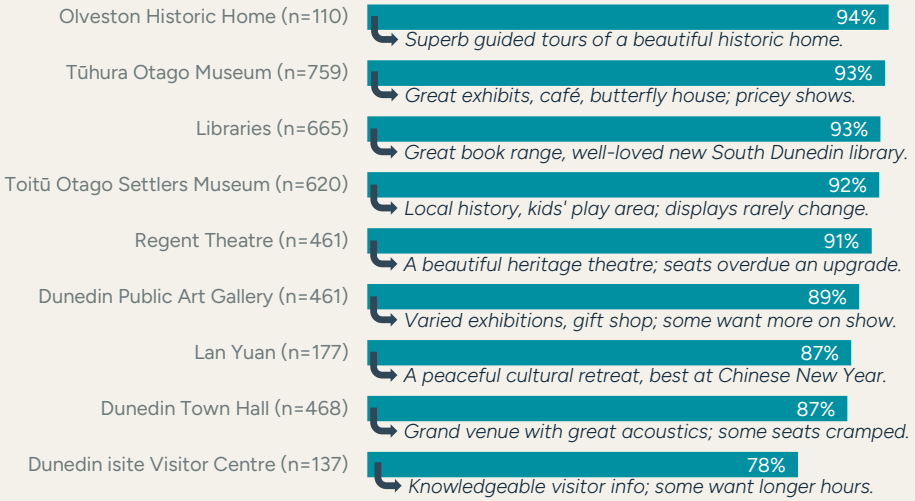


Figure 20: Visitor satisfaction with each facility: Creative and Cultural Facilities..

Question: How satisfied or dissatisfied were you with each of these facilities that you visited in the last year?

Why visitors gave those ratings:

WHAT RESIDENTS LOVE

Helpful, friendly, knowledgeable staff are the most-praised element. These are also the places Dunedin is proud to show off, with many describing visits with children, grandchildren and out of town visitors. The spaces themselves are consistently described as well kept and welcoming.

> *"The interactive nature of [Tūhura Science Centre] and the butterflies make it a great place to take kids.*
> Female, 30 - 34 years, Kaikorai Valley.

WHAT COULD BE BETTER

There's little residents would change, and what they mention is small and specific. The most common thread across the museums and gallery is a wish for exhibits to change more often, giving a fresh reason to return. At the older venues the recurring note is seating comfort, with Regent's seats and Town Hall's chairs both drawing calls for an upgrade.

> *"Great, but the seats need upgrading.*
> Female, 45 - 49 years, South Dunedin.

Note: The way visitors were identified changed this year, comparisons to 2024-25 not made.



SERVICE AREA

Infrastructure

SERVICE AREA – INFRASTRUCTURE | WATER SUPPLY, STORMWATER, AND SEWERAGE

Water infrastructure down, with stormwater the main challenge

Residents rate their drinking water highly, but overall satisfaction with water infrastructure fell this year to 49%. Flooding and stormwater are the dominant concern and, on a measure this important to overall satisfaction, the biggest opportunity to improve.

Satisfaction with water related infrastructure:

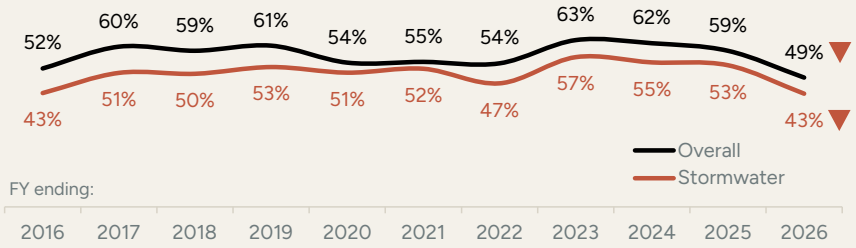


Figure 21: Satisfaction with water related infrastructure.

69%
Water Pressure & Quality

60%
Sewerage System
▼ -6 vs 2024-25

43%
Stormwater
▼ -11 vs 2024-25

Question: How satisfied or dissatisfied are you with each of the following? Question: Overall, how satisfied or dissatisfied are you with the way the DCC provides and manages the city's water-related infrastructure? Base: All respondents who provided a rating, minimum n=762.

49% satisfied in 2025-26

with how DCC provides and manages water-related infrastructure.

CLEAN DRINKING WATER IS VALUED

Water pressure and quality rate well, and many positive comments are about clean, reliable supply.

STORMWATER AND FLOODING IS THE DRAG

By far the biggest concern is flooding, drainage and stormwater capacity in heavy rain. It's felt most acutely in South Dunedin but raised across the city.

> *The stormwater drainage in my area is always flooding after a large downpour.*
> Female, 50 - 54 years, Mosgiel.

WHAT WOULD MOVE THE DIAL

Water is a strong driver of overall satisfaction. Flood resilience, drainage, and stormwater capacity is a lever to lift both satisfaction and perceived value for money.

SERVICE AREA – INFRASTRUCTURE | ROADS, FOOTPATHS, & PARKING

Roading infrastructure falters most for those in a vehicle

34% SATISFIED OVERALL (n=1,162)

Roading is the lowest scoring service area, and one of the strongest drivers of overall satisfaction. Getting around on foot rates somewhat well, though congestion, parking, and the condition of the roads are where residents are least satisfied.

Satisfaction with the city's roading-related infrastructure:

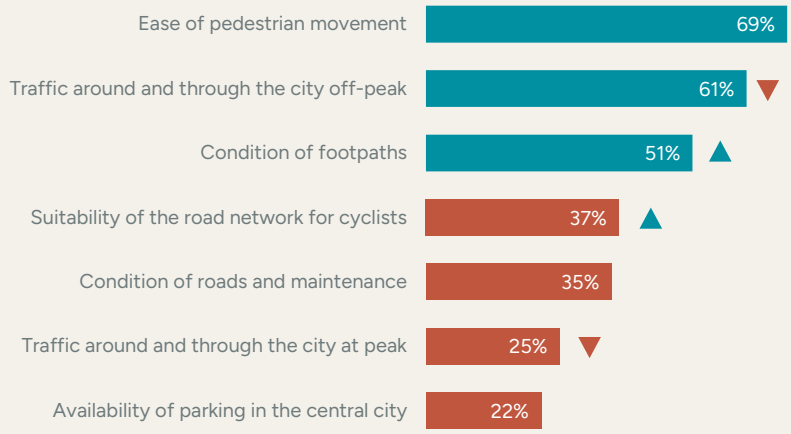


Figure 22: Satisfaction with the city's roading-related infrastructure.

THREE PAIN POINTS, ALL ABOUT DRIVING

Congestion at peak times, central-city parking, and the condition of the roads are the biggest concerns. Walking around the city, by contrast, rates reasonably well.

ROAD CONDITION IS THE STANDOUT

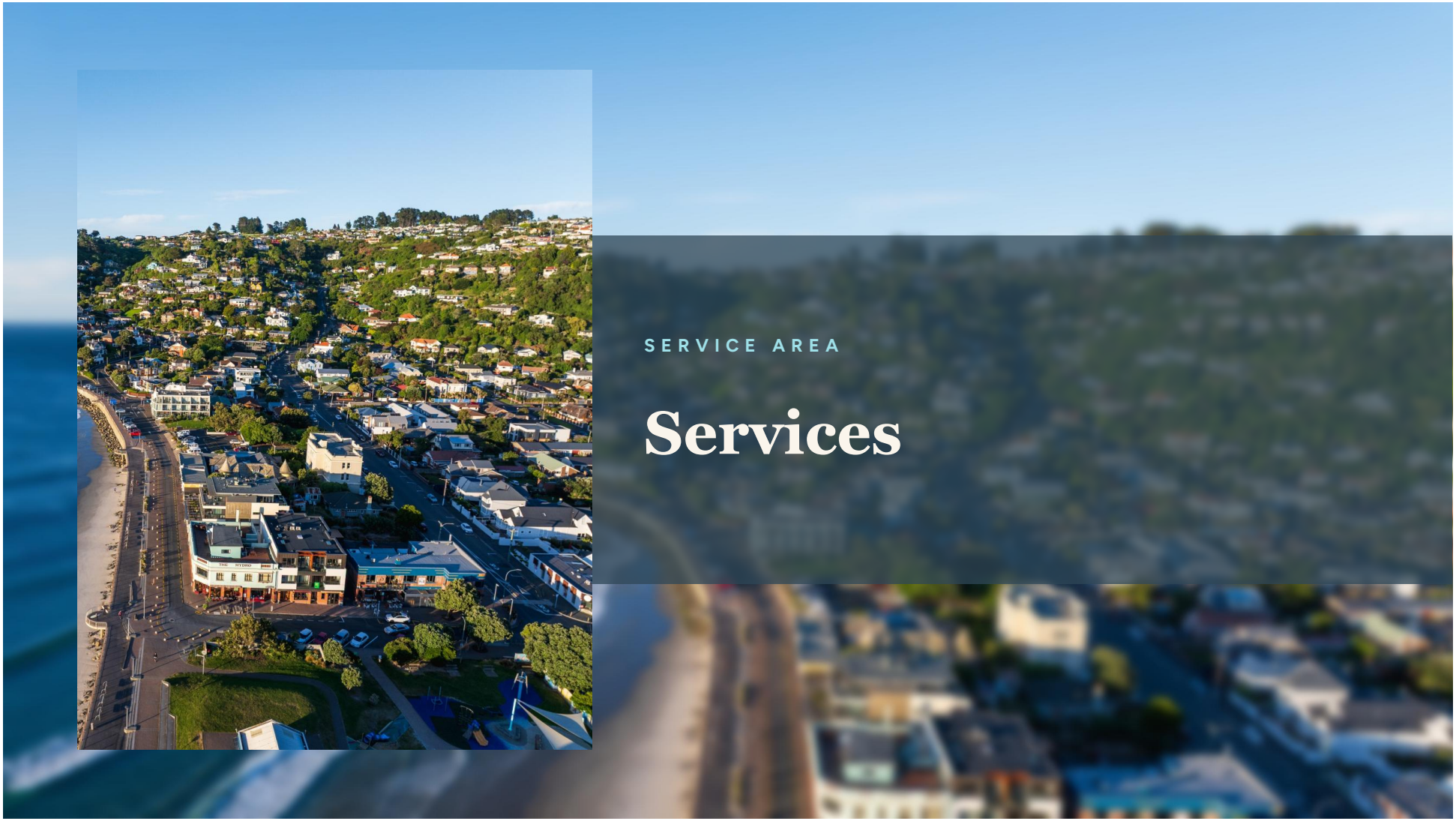
Potholes and patch-up repairs draw the most complaints, and road condition has slipped over the decade. As a top driver of overall satisfaction, sustained road maintenance would likely help move the dial.

> *Dunedin roads are rubbish - uneven, potholes, very hard on suspension and tyres.*
> Male, 45 - 49 years, North Dunedin.

IMPROVEMENT FOR CYCLING

Satisfaction with the road network for cyclists is up significantly compared to last year, and at its highest in the last decade. This rise coincides with recent cycleway investment. It remains low in absolute terms, but is moving in the right direction, even as some residents question the spending.

Question: Overall, how satisfied or dissatisfied are you with the way the DCC manages the city's roading-related infrastructure? Question: How satisfied or dissatisfied are you with each of the following?
Base: All respondents who provided a rating, minimum n=944.



SERVICE AREA

Services

SERVICE AREA – SERVICES | WASTE DISPOSAL

Kerbside waste collection strong, public bins and cleaning weaker

Overall satisfaction with the rubbish disposal and recycling services provided by the council is on a steady trend up, following a low in 2020-21. Residents rate the at-home kerbside collection services highest, with kerbside rubbish improving significantly this year. The public on-street services sit lower.

Satisfaction with rubbish disposal and recycling services:

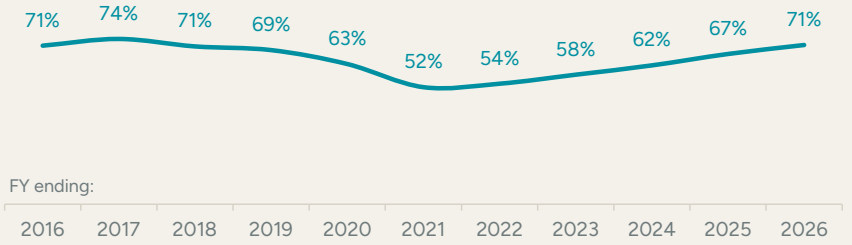


Figure 23: Satisfaction with rubbish disposal and recycling services.

80% Kerbside Recycling Collection

77% Kerbside Rubbish Collection

▲ +11 vs 2024-25

59% Public Street Litter Bins

58% Public Recycling Bins

57% General Street Cleanliness

Question: Overall, how satisfied or dissatisfied are you with the rubbish disposal and recycling services provided by the DCC? Question: How satisfied or dissatisfied are you with each of the following services? Base: All respondents who provided a rating, n=821.

71% satisfied in 2025-26

with rubbish disposal and recycling services overall.

THE KERBSIDE SYSTEM IS WORKING

The at-home kerbside services rate highest, and kerbside rubbish collection has risen 11 percentage points in a year. Residents repeatedly single out the new bin system, and the green food scraps and garden waste bin in particular, as a genuine improvement, with many also praising the reminder app.

> *I love the new bin system, well done.*
> Female, 50 - 54 years, Middlemarch.

THE GAP IS ON-STREET

Scores are lower for the public-facing services, being litter bins, recycling bins, and general street cleanliness. Residents want more public bins across the suburbs and the CBD and say the ones already there are often full or overflowing. The most common on-street frustration is the state of student areas, where broken glass and dumped rubbish draw repeated complaints, and some central city residents note there is no kerbside collection in the CBD at all.

SERVICE AREA – SERVICES | REGULATORY

Parking enforcement shows the most room for improvement

Overall satisfaction with council's regulatory services tracks reasonably steadily over time. Parking enforcement is the clear low point, and the most divisive, while dog and noise control are the other friction areas.

Satisfaction with regulatory services the DCC provides:

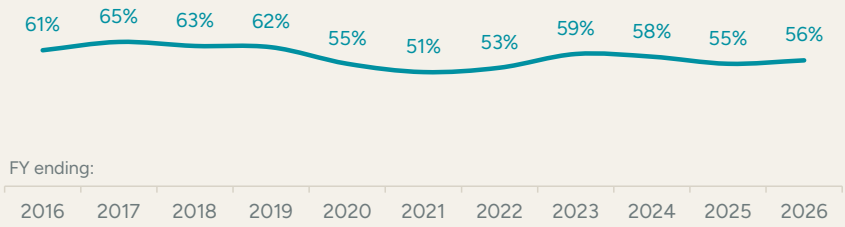


Figure 24: Satisfaction with regulatory services the Dunedin City Council provides.

58%	56%	53%	43%
Roaming Dog Control	Noise Control	Barking Dog Control	Parking Enforcement

Question: Overall, how satisfied or dissatisfied are you with the regulatory services provided that the DCC provides? Question: How satisfied or dissatisfied are you with each of the following regulatory, monitoring, and enforcement services? Base: All respondents who provided a rating, n=761.

56% satisfied in 2025-26

with the regulatory services that the DCC provides.

PARKING CUTS BOTH WAYS

This is the biggest single complaint, though residents are split on it. Some see enforcement as too harsh and hard on CBD businesses, while others want it applied more consistently and point to all-day parkers and illegal parking going unchecked. Some of the frustration is aimed at private operators rather than the DCC.

> *Parking enforcement is just money-making and hurting businesses in the CBD.*
> Male, 50 - 54 years, North Dunedin.

> *A lot of illegal and dangerous parking in the city centre after hours is allowed to go unpunished.*
> Male, 65+ years, area not stated.

DOGS AND NOISE THE OTHER FRICTIONS

Roaming and barking dogs, and unaddressed noise, are also concerns.

> *Noise issues are still happening on my street.*
> Male, 25 - 29 years, North Dunedin.



SERVICE AREA

Contact & Information

SERVICE AREA – CONTACT & INFORMATION | COMMUNICATION

No single channel reaches everyone

Just over half of residents feel well informed by the Council. The website is the best rated channel, but many rely on social media and the local news, such as the Otago Daily Times, instead, and what they'd like from Council covers both digital and physical. Satisfaction with communication channels remains stable with last year.

OVERALL

57%

satisfied with how well the DCC keeps people informed

62%	DCC Website
54%	FYI Newsletter
53%	DCC Social Media
46%	Other Newsletters

HOW RESIDENTS RATE IT

The website is the strongest DCC channel, but many say they hear about things through social media or the Otago Daily Times rather than from the Council directly, and some find out too late.

> *Besides the thing I get in the mail, all my communication comes from the ODT.*
> Male, 50 - 54 years, Mosgiel.

WHAT THEY'D LIKE - A SPREAD OF CHANNELS

No single channel suits everyone. Requests for more social media, almost always Facebook, which many already value, came up alongside a clear wish for something physical in the letterbox, strongest among older residents but raised across the age range. Email and local media also featured.

> *I mostly get my updates from Facebook and haven't had any issues.*
> Female, 30 - 34 years, Hill Suburbs.

> *I used to get the monthly newsletter from the council, but haven't had it at all this year. It used to be delivered to my letter box.*
> Male, 65+ years, Green Island.

Figure 25: Satisfaction with Dunedin City Council's communication.

Question: Overall, how satisfied or dissatisfied are you with how well the DCC keeps people informed? Question: How satisfied are you with each of the following? Base: All respondents who provided a rating, n=533.

SERVICE AREA – CONTACT & INFORMATION | COUNCIL CONTACT

Helpful in the moment, but a gap with following up

69% SATISFIED OVERALL (n=343)

Around a third of residents contacted DCC staff in the past three months, mostly by phone. Staff rate highly for being friendly, clear and knowledgeable, but keeping people informed on progress is the weak point.

Satisfaction with aspects of council contact:



Figure 26: Satisfaction with aspects of council contact.

Question: Overall, how satisfied or dissatisfied are you with how staff handled your enquiry? Question: Thinking about your most recent contact with DCC staff, how satisfied or dissatisfied were you that staff? Base: All respondents who provided a rating, minimum n=306.

WARM, CAPABLE, AND QUICK WHEN REACHED

The interaction itself is a genuine strength, with residents describing staff as friendly and knowledgeable, and efficient at getting the problem sorted when things go smoothly. The person-to-person side works well.

> *Friendly, knowledgeable, got job done.*
> Anonymous resident.

A COMMON GAP

By far the most common frustration is not hearing back after the initial conversation, with promised call-backs that never come and enquiries left open, described as "still waiting" and "had to chase". Slower resolution and no acknowledgement that an issue is being looked at are the related complaints.

> *I was told someone would get in touch to discuss a stormwater issue. Never happened. Had to phone 3 times to finally get some action.*
> Male, 50 - 54 years, North Coast.

A PROCESS ISSUE, NOT A PEOPLE ONE

Because the staff themselves rate so well, the follow-up failure appears as a system problem, rather than a shortcoming of those answering the call.

Note: Specific aspects were asked after differently in previous years, so comparisons to 2024-25 have not been made.



SERVICE AREA

Planning & Urban Design

SERVICE AREA – PLANNING & URBAN DESIGN

Residents broadly happy with how the city looks

Satisfaction with how the city is developing sits at 60%, having recovered from a low around 2020-21 before easing slightly. Residents like the city's greenery and steady improvement, but empty shopfronts and heritage loss are recurring concerns. Notably, satisfaction with the centre residents visited most recently improved significantly compared to 2024-25.

Satisfaction with the way the city is developing:

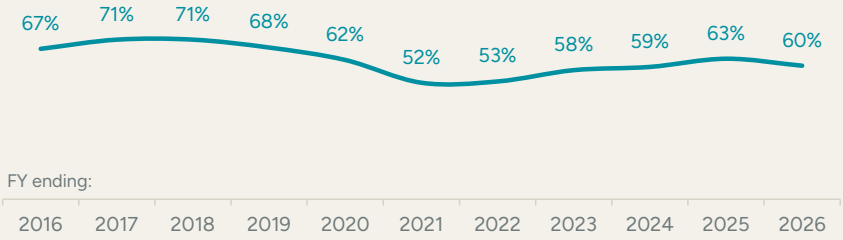


Figure 27: Satisfaction with the way the city is developing.

69%	68%	67%	66%
Local Suburb	Most Visited Centre	The City	Central City Retail
	▲ +5 vs 2024-25		

Question: Overall, how satisfied or dissatisfied are you with the way the city is developing in terms of its look and feel? Question: How satisfied or dissatisfied are you with the overall look and feel of the following? Base: All respondents who provided a rating, n=817.

6/10 satisfied in 2025-26

with the way the city is developing in terms of its look and feel.

WHAT PEOPLE VALUE

The city's greenery and trees, a tidier, more modern look, and a sense that things are steadily improving, with heritage character valued where it has been kept.

> *People are starting to take a little pride in the way the City looks.*
> Male, 65+ years, area not stated.

WHAT CONCERNS THEM

Empty and run-down shopfronts, described as "shabby" and "dying", are the biggest planning worry, alongside the loss of heritage buildings.

> *Too many empty shops in Dunedin. This makes Dunedin look shabby.*
> Female, 65+ years, Mosgiel.

> *Heritage is being overlooked in place of short-term profit.*
> Male, 40 - 44 years, West Harbour.



05

Who We Spoke To

SAMPLE PROFILE

Sample profile

	No. Invited
AREA	
Andersons Bay	742
Dunedin Centre	1,421
Green Island	632
Hill Suburbs	763
Kaikorai Valley	520
Middlemarch	281
Mosgiel	752
North Coast	315
North Dunedin	2,320
Peninsula	280
South Coast	253
South Dunedin	1,353
Wakari	672
West Harbour	346
Total	10,650

	No. Invited
ELECTORAL ROLL	
Māori Roll	1,056
General Roll	9,594

RESPONDENT PROFILE

Respondent profile

	Weighted %	Unweighted Base	Weighted Base
GENDER			
Male	46%	505	550
Female	49%	634	591
Gender Diverse	2%	19	19
Prefer not to say	4%	47	45
AGE			
18 - 29 years	27%	222	319
30 - 49 years	28%	364	337
50 - 64 years	22%	313	269
65+ years	21%	258	258
Prefer not to say	2%	48	22
ETHNICITY			
European	85%	1035	1021
Māori	8%	122	101
Pacific	3%	18	39
Asian	8%	48	94
MELAA	1%	7	16
Other Ethnicity	4%	62	52
Prefer not to say	4%	62	47
PROPERTY OWNERSHIP IN DUNEDIN			
Yes	64%	831	766
No	31%	309	377
Underway	2%	13	18
Prefer not to say	4%	52	44

	Weighted %	Unweighted Base	Weighted Base
AREA			
Andersons Bay	7%	83	81
Dunedin Centre	6%	68	74
Green Island	5%	60	61
Hill Suburbs	9%	115	114
Kaikorai Valley	7%	79	79
Middlemarch	2%	29	26
Mosgiel	6%	80	78
North Coast	3%	43	39
North Dunedin	18%	197	213
Peninsula	3%	37	34
South Coast	3%	33	35
South Dunedin	12%	143	143
Wakari	5%	61	58
West Harbour	4%	49	45
Not Stated	10%	128	126

RESPONDENT PROFILE

Respondent profile

	Weighted %	Unweighted Base	Weighted Base
EMPLOYMENT			
Employed full-time	44%	536	529
Employed part-time	11%	138	127
Employed casually	3%	29	35
Self-employed	6%	74	71
Unemployed / looking / in between jobs	3%	28	31
Student / Education / Training	11%	95	127
Retired	17%	208	200
Volunteering	1%	16	15
Not in paid work (e g , caregiving)	2%	27	25
Prefer not to say	4%	54	45
TRANSPORT TO WORK / STUDY			
I work from home (in paid employment)	6%	57	52
Public bus	9%	80	84
Drive a car, van, or truck - passengers	20%	193	186
Drive a car, van, or truck - no passengers	38%	341	343
As a passenger in a car, van, or truck	3%	27	31
Motorbike	1%	7	7
Non-electric bicycle	4%	27	33
Electric bike / scooter	2%	22	20
Walk or jog	15%	120	135
Not applicable	2%	17	16
Prefer not to say	1%	8	8

	Weighted %	Unweighted Base	Weighted Base
VEHICLE TYPE			
Electric	5%	26	26
Hybrid	11%	64	61
Petrol or Diesel	84%	467	469
Don't Know	0%	1	1
Prefer not to say	0%	2	2
INCOME			
Under $50,000	17%	190	205
$50,000 - $79,999	12%	141	143
$80,000 - $109,999	13%	155	153
$110,000 - $139,999	8%	102	101
$140,000 - $169,999	9%	108	106
$170,000 - $199,999	7%	85	86
$200,000 +	9%	111	106
Dont Know	7%	62	80
Prefer not to say	19%	250	223

RESPONDENT PROFILE

Respondent profile

	Weighted %	Unweighted Base	Weighted Base
HOUSEHOLD MAKEUP			
Young, single living alone	3%	38	39
Young couple without children	4%	37	44
Group flatting	11%	98	129
Living with my parents	8%	67	97
Family with mainly pre-school kids	6%	66	67
Family with mainly school aged kids	8%	109	98
Family with kids aged 15 or more	6%	90	78
Family with kids of mixed ages	4%	55	51
Extended family, multiple generations	3%	35	36
Older couple, no kids at home	23%	289	272
Older, single living alone	8%	109	101
Prefer not to say	6%	90	71
Other	10%	122	123
DIFFICULTIES*			
Seeing, even if wearing glasses	19%	236	231
Hearing, even if using a hearing aid(s)	15%	179	179
Walking or climbing steps	16%	206	195
Remembering or concentrating	19%	218	223
Self-care, e.g., washing all over, dressing	4%	43	43
Communicating using usual language	5%	57	60

** 'some difficulty', 'a lot of difficulty', and 'cannot do at all' combined.*

RESPONDENT PROFILE

Technical notes

Method:

The Residents' Opinion Survey ran monthly from July 2025 to June 2026. Each month a fresh sample of Ōtepoti Dunedin residents aged 18 and over was drawn from the electoral roll and sent an invitation letter with a unique code to complete the survey online, with a paper copy available to anyone who called and requested one. Paper accounted for 1% of completed responses, down from 10% last year, when full paper questionnaires were posted out to a random selection of people who had not responded. From April to June 2026 a test was carried out, where invitations also carried a household leaflet with additional unique codes, so other adults in the household could take part. This intervention did not result in a significant difference in new responses.

Sampling:

The monthly sample is stratified by area so it reflects how the Dunedin population is distributed across the city, benchmarked against 2023 Census data. Everyone selected is contacted once, and residents drawn in earlier months are stood down so no one is invited twice in the same year. We sent 10,650 invitations and received 1,205 completed responses, a response rate of 11.3%, against a target of 1,200 agreed with the Council.

Margin of error:

The total sample has a maximum margin of error of +/- 2.8% at the 95% confidence level. Subgroup results carry a wider margin.

Significance testing:

Statistically significant differences between 2025-26 and 2024-25 results are marked with arrows throughout this report, indicating a result that is significantly higher or lower at the 95% confidence level. Differences without an arrow are not statistically significant at that level. The questionnaire was revised for 2025-26, including a change from a ten-point rating scale to a five-point scale, so a marked difference may reflect the change in measurement as well as a change in residents' views.

Weighting:

Results are weighted by age, gender, and ethnicity to 2023 Census distributions for the Dunedin adult population. Weights are capped and applied to all results in this report unless a chart states otherwise.

Other notes:

Percentages may not sum to 100% because of rounding. Don't Know and Not Applicable responses are excluded from satisfaction results, and base sizes are shown alongside each chart.

QUALITY OF LIFE 2026 - DUNEDIN SPECIFIC REPORT

Department: Corporate Policy

EXECUTIVE SUMMARY

1 This report summarises key findings from the 2026 Quality of Life (QoL) Survey for Ōtepoti Dunedin. The full Ōtepoti Dunedin report is attached as Attachment A.

2 The survey provides a biennial snapshot of residents' perceptions of quality of life in general, the city's built and natural environment, housing, public transport, health and social connections, social issues, climate change, employment and cost of living, and trust in people and institutions.

3 The survey found that overall perceptions of quality of life remain high, with most residents continuing to rate their quality of life positively and viewing Ōtepoti Dunedin as a good place to live.

4 Positive results have shown strong ratings for overall liveability, environmental quality, access to green and open spaces, and feelings of safety during daylight hours.

5 The results also highlight ongoing challenges, including cost-of-living pressures, housing affordability, perceptions of safety after dark, community connectedness, and perceptions of social issues in public spaces.

6 Several new and revised questions were introduced in 2026, providing new information on respondents' experiences of green and open spaces, housing security (worrying about being forced to move), food security, home heating and cooling affordability, and climate change-related actions.

7 The survey provides an evidence base to support Council planning, policy development, service improvement, and monitoring of community outcomes.

RECOMMENDATIONS

That the Committee:

a) **Notes** the results of the 2026 Quality of Life Survey.

BACKGROUND

The Quality of Life project is a research collaboration

8 The Quality of Life project is a collaborative research project for communities in urban settings undertaken by several councils across Aotearoa New Zealand. The survey was first undertaken in 2003, repeated in 2004, and has since been conducted every two years.

9 The survey provides information on residents' perceptions of their health, overall quality of life, environmental conditions, social connectedness, public safety, housing, governance, and other issues affecting communities in urban centres.

10 The collaborative nature of the project enables participating councils to share the costs of a large-scale research project while also providing a robust dataset for comparability and benchmarking.

The Dunedin City Council is part of the Quality of Life Management Team

11 The Quality of Life project is overseen by a Quality of Life Management Team (the Management Team) comprising representatives from participating councils, including the Dunedin City Council. The Management Team is responsible for setting the overall direction of the project, reviewing survey content, identifying emerging issues for investigation, overseeing project delivery, and ensuring consistency in reporting and analysis across participating councils.

12 While the survey includes a core set of questions that allows trends to be monitored over time, both the number of participating councils and the survey content have varied between survey rounds. Additional topics have been introduced periodically to reflect emerging issues facing communities and the information needs of participating councils.

13 Participating councils jointly procure a specialist research company to design and administer the survey, undertake data collection, analyse results, and prepare reporting. Using an external research provider ensures the survey is undertaken using robust and statistically sound research methodologies and provides consistency across participating councils. It also enables councils to access specialist survey, sampling and data analysis expertise that may not be available internally, particularly for smaller councils.

Methodology, fieldwork, and technical summary

14 The 2026 survey was undertaken between March and May 2026 using a combination of online and face-to-face interviews.

15 A total of 5,725 respondents across the seven participating councils – including 579 Ōtepoti Dunedin residents – participated in this round of the survey.

DISCUSSION

Overview – Quality of life remains high

16 Overall perceptions of quality of life in Ōtepoti Dunedin remain high, with 83% of respondents reporting a positive quality of life. This result is unchanged from 2024 but is lower than the levels recorded in 2022 (87%) and 2020 (90%).

17 The survey identifies several challenges affecting residents, particularly ongoing cost-of-living pressures, concerns regarding social issues in public places, perceptions of safety after dark, and declining measures of community connectedness.

18 However, respondents generally continue to view Ōtepoti Dunedin positively as a place to live, with strong results across measures relating to environmental quality, parks, and open spaces, and overall city liveability.

Cost-of-living pressures remain a significant concern

19 Cost-of-living pressures continue to influence wellbeing outcomes. Financial wellbeing has consistently been identified as one of the key factors associated with negative changes in quality of life, since at least 2020.

20 58% of respondents reported having either not enough income or only just enough income to meet their everyday needs, comparable to 2024 (59%) but higher than in 2022 (42%) and 2020 (47%). Financial worry for most or all of the time, which was an added question in 2024, is at a similar level in 2026 (29%) compared with 2024 (27%).

21 New questions introduced in 2026 provide additional insight into the impacts of cost-of-living pressures on households. 22% of respondents reported experiencing food insecurity during the previous 12 months, 42% reported reducing spending on non-essential items, and 24% reported reducing spending on essential items. In addition, 15% reported being unable to afford to adequately heat or cool their home.

Housing affordability has improved but remains a challenge

22 Perceptions of housing affordability improved compared with 2024, with 44% of respondents agreeing that housing costs were affordable, compared with 38% in 2024. However, this remains below the levels recorded in 2022 (52%) and 2020 (53%).

23 A new housing security measure introduced in 2026 found that 20% of respondents had worried about being forced to move from their home during the previous 12 months.

Community connectedness continues to decline

24 Following a decline between 2020 and 2022 and a period of stability between 2022 and 2024, measures of community connectedness declined markedly in 2026.

25 41% of respondents reported experiencing a sense of community in their neighbourhood, compared to 47% in 2024, while 49% considered a sense of community important to them, compared with 58% in 2024.

Concerns regarding social issues continue to increase

26 Some of the highest levels of concern reported in the survey relate to social issues that are visible in public spaces.

27 Concern regarding people sleeping rough in public places has increased steadily over recent survey rounds, with 77% of respondents identifying it as an issue in 2026, compared with 71% in 2024 and 63% in 2022.

28 Similarly, concern regarding begging in public places increased from 63% in 2022 to 68% in 2024 and 74% in 2026.

29 Concern regarding rubbish and litter also increased, from 66% in 2022 to 70% in 2024 and 76% in 2026.

30 Concern regarding anti-social behaviour remains high, with 69% of respondents identifying it as an issue. It is important to note that while previous surveys focused primarily on alcohol and drug-related behaviour, the 2026 survey adopted a wider definition that included behaviours

such as public intoxication, intimidation, harassment, threatening behaviour and abuse. Direct comparisons with previous survey rounds should therefore be treated with caution.

Safety perceptions remain mixed

31 Most residents continue to report feeling safe during daylight hours (92%), which is broadly consistent with recent survey rounds.

32 Perceptions of safety after dark remain substantially lower and have steadily decreased over recent survey rounds, particularly in the city centre. In 2026, 48% of respondents reported feeling safe in the city centre after dark, compared with 54% in 2024, 58% in 2022 and 61% in 2020. Perceptions of safety in neighbourhoods after dark have followed a similar pattern, declining from 84% in 2020 to 81% in 2022, 79% in 2024 and 75% in 2026.

33 Dangerous driving continues to be a significant concern for residents. In 2026, 69% of respondents identified dangerous driving as a problem in their local area, consistent with previous survey rounds.

Confidence in governance remains relatively stable

34 Measures relating to trust in institutions and confidence in Council decision-making remained broadly consistent with recent survey rounds. Confidence that the Dunedin City Council makes decisions in the best interests of the city was reported by 33% of respondents and 39% of respondents considered that the public has at least some influence over Council decision-making.

35 Trust levels remained highest for institutions such as the Police (64%) and the public education system (57%). By comparison, trust in local government (26%) and central government (22%) remained comparatively lower.

Climate change awareness and action are increasing

36 While climate change has been included as a survey topic since 2020, the questions have evolved over successive survey rounds. Therefore, comparisons with earlier survey rounds are limited.

37 Understanding of climate change and its likely impacts on Ōtepoti Dunedin increased significantly, from 59% in 2024 to 70% in 2026, indicating a growing awareness of climate-related issues among residents.

38 The 2026 survey introduced new questions exploring the actions residents are taking in response to climate change. The most commonly reported actions were reducing waste (64%), changing purchasing habits (50%), reducing transport emissions (37%), and reducing household energy consumption (34%).

Green and open spaces are a notable strength

39 New questions introduced in 2026 explored residents' experiences of green and open spaces. It represents one of the strongest areas of performance for Ōtepoti Dunedin identified in the survey.

40 Results were strongly positive, with 90% of respondents agreeing that green and open spaces are easy to access and 84% agreeing that they are important for supporting health.

41 Satisfaction with the maintenance and quality of these spaces was also relatively high, with 70% of respondents expressing satisfaction with their upkeep.

Ōtepoti Dunedin in the context of other participating councils

42 The 2026 Quality of Life Survey indicates that Ōtepoti Dunedin continues to perform comparatively well across a number of key quality-of-life indicators.

43 Overall quality of life for Ōtepoti Dunedin (83%) performed significantly above the seven-city average (76%).

44 Ōtepoti Dunedin also performed strongly on measures relating to access to green and open spaces (90% against 7-City average of 85%) and housing affordability (44% against 7-City average of 36%) relative to many large urban centres.

45 The survey highlights challenges that are common across participating councils, including financial pressures, social cohesion, and perceptions of safety. Although these issues are also present in Ōtepoti Dunedin, comparative results suggest they are often less pronounced than in many larger urban centres.

OPTIONS

46 There are no options as this report is provided for information.

NEXT STEPS

47 The findings from the 2026 Quality of Life Survey will be used to support Council planning, policy development, monitoring and reporting activities.

48 Survey results will also contribute to future monitoring of perceptions of quality of life amongst Ōtepoti Dunedin's residents and provide a benchmark against which future survey rounds can be assessed.

Signatories

Author:	Rula Abu-Safieh Talahma - Senior Policy Analyst Alix de Blic - Senior Policy Analyst
Authoriser:	Nicola Morand - Manahautū (General Manager Community and Strategy)

Attachments

	Title	Page
⇨A	Ōtepoti Dunedin report Quality of Life survey 2026 *(Under Separate Cover 1)*	

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 interest of communities in the present and for the future.
This decision promotes the economic interest of communities in the present and for the future.
This decision promotes the environmental interest of communities in the present and for the future.
This decision promotes the cultural interest of communities in the present and for the future.

Fit with strategic framework

	Contributes	Detracts	Not applicable
Social Wellbeing Strategy	✓	☐	☐
Economic Development Strategy	✓	☐	☐
Environment Strategy	✓	☐	☐
Arts and Culture Strategy	✓	☐	☐
3 Waters Strategy	✓	☐	☐
Future Development Strategy	✓	☐	☐
Integrated Transport Strategy	✓	☐	☐
Parks and Recreation Strategy	✓	☐	☐
Other strategic projects/policies/plans	✓	☐	☐

The survey provides information relevant to a range of Council strategies and plans. The survey also provides an evidence base that can inform future strategic planning, policy development and monitoring activities across the organisation.

Māori Impact Statement

The survey contributes to Council's understanding of quality of life outcomes for Māori in Ōtepoti Dunedin. To improve representation and enable more robust analysis of Māori responses, an additional Māori sample of 50 respondents was included in the survey.

Sustainability

The findings provide information on a range of sustainability-related issues including housing affordability, financial wellbeing, climate change, access to green and open spaces, and perceptions of the local environment.

LTP/Annual Plan / Financial Strategy /Infrastructure Strategy

Several Community Outcome indicators in the Annual Report rely on the Quality of Life survey results. Some of the survey findings may be used to inform future planning.

Financial considerations

There are no financial implications arising from the recommendation to note the results of the survey. The costs associated with participation in the Quality of Life project are provided for within existing operational budgets and are shared between participating councils as part of the collaborative project.

Significance

This decision is considered low significance in terms of Council's Significance and Engagement Policy. The report presents survey findings for information only.

SUMMARY OF CONSIDERATIONS
Engagement – external During the development of questionnaire, members of the Management Team (Auckland, Wellington, Christchurch, and Dunedin) ran cognitive testing to check that the questions were understood by respondents from different backgrounds the way they were intended for. The field work, analysis, and reporting were undertaken by an independently contracted research provider on behalf of participating councils. No additional external engagement has been undertaken for the purposes of this report.
Engagement - internal This report has been prepared by the Corporate Policy team.
Risks: Legal / Health and Safety etc. There are no identified risks.
Conflict of Interest There are no known conflicts of interest.
Community Boards There are no direct implications for Community Boards. The geographic areas used for Quality of Life reporting are aligned with the spatial areas identified in the Future Development Strategy and do not correspond directly with Community Board boundaries. This approach supports the use of the survey results for long-term planning and growth management. While the survey findings may be of interest to Community Boards, the results are not reported at a Community Board level.

2025/26 ZERO CARBON END OF YEAR REPORTING AND 2026/27 ZERO CARBON IMPLEMENTATION PLAN

Department: Zero Carbon

EXECUTIVE SUMMARY

1 This report presents to Council a summary of activity undertaken in 2025/26 by the DCC to manage and reduce organisational (DCC) emissions, and Dunedin-wide emissions. It also presents the Zero Carbon implementation plan for 2026/27.

2 This includes:

a) DCC's externally verified Greenhouse Gas Emissions Inventory and Management Report (IMR) 2025/26;

b) Full year reporting for actions in the Zero Carbon implementation plan 2025/26; and

c) The Zero Carbon implementation plan 2026/27.

DCC emissions

3 The DCC's Emissions Management and Reduction Plan (EMRP) 2025/26-2029/30 sets organisational targets and actions required to achieve targets. The organisation's annual emissions result and progress against EMRP actions is reported in the annual IMR.

4 DCC's 2025/26 emissions reporting has been finalised following audit verification and is presented in the IMR 2025/26 (Attachment A).

5 Overall, DCC's emissions from the sources included in the IMR 2025/26 were:

- 30.7% (26,773 tonnes of carbon dioxide equivalent, or tCO_2e) lower than baseline, and
- 1.6% (956 tCO_2e) higher than 2024/25

6 The increase in emissions in 2025/26 compared with 2024/25 was primarily due to increases from the following sources:

- Green Island waste to landfill emissions (2,144tCO_2e higher in 2025/26)
- Composting emissions (120tCO_2e higher in 2025/26)
- Emissions associated with sludge from Tahuna Wastewater Treatment Plant deposited at a private landfill (260tCO_2e higher in 2025/26)

7 These increases were partially offset by reductions in 2025/26 compared with 2024/25 from the following sources:

- Stationary energy emissions (504tCO_2e lower in 2025/26)
- Water Treatment Chemicals emissions (211tCO_2e lower in 2025/26); and
- Wastewater Treatment Plant emissions (497tCO_2e lower in 2025/26)

8 Overall, of commenced DCC EMRP actions 21 are on track to deliver emissions reduction objectives and be completed as scheduled ('green'), 19 are subject to delays or minor scope contractions ('amber'), and 19 are subject to major delays or scope contractions ('red', several of these being on hold). These actions are included in the IMR (Attachment A), and also the full year reporting on the Zero Carbon implementation plan 2025/26 (Attachment B).

City Emissions

9 The Zero Carbon Plan sets out the key shifts needed for Dunedin to become a Zero Carbon city, and action areas for the DCC to help bring about those shifts. Zero Carbon implementation plans are produced annually and reflect actions that can be advanced within adopted annual budgets.

10 The Zero Carbon implementation plan 2025/26 reflected Year 1 of the 9 Year Plan 2025-2034. Of the 56 specific timebound projects anticipated to be advanced in 2025/26, 20 are on track ('green'), 18 are subject to delays or minor scope contractions ('amber'), and 18 are subject to major delays or scope contractions ('red', several of these being on hold).

11 The Zero Carbon implementation plan 2026/27 reflects Year 2 of the 9 year plan 2025-34. As in 2025/26, progress on 'business as-usual' actions will be reported at end of year only.

RECOMMENDATIONS

That the Committee:

a) **Notes** DCC's verified Greenhouse Gas Emissions Inventory and Management Report (IMR) 2025/26;

b) **Notes** full year reporting on the Zero Carbon implementation plan 2025/26; and

c) **Notes** the Zero Carbon implementation plan 2026/27.

BACKGROUND

12 In July 2022 Council adopted the Zero Carbon Policy (CNL/2022/049). The Policy formalises DCC's intention to pursue emissions reduction at two scales – organisational (DCC emissions), and Dunedin-wide (city emissions).

DCC emissions are monitored and reported using a standard organisational methodology

13 DCC's Zero Carbon Policy states that 'the DCC will monitor, measure, report, manage, verify and publicly report DCC emissions on a regular basis in line with the requirements of ISO 14064'. ISO 14064 is a widely used standard methodology for measuring and reporting emissions at the organisational scale.

14 The Zero Carbon Policy also states that the DCC will contribute to achieving emissions reduction targets including through implementing DCC emission reduction plans. It directs the DCC to prioritise gross emissions reductions.

15 The Zero Carbon work programme guiding principles adopted by Council in February 2022 (CNL/2022/004) are also of relevance to management of DCC emissions. They emphasise alignment with best practice.

16 To give effect to the Zero Carbon Policy, the DCC maintains an Emissions Management and Reduction Plan (EMRP) which sets out organisational targets and DCC's intended approach to reduce emissions (actions required to achieve targets). The DCC EMRP 2025/26-2029/30, reflecting the 9 year plan, was adopted by ELT and noted by Council in September 2025 (CNL/2025/277).

17 The scope of the DCC emissions managed and reported on are determined using the 'operational control' methodology. This includes activities undertaken by DCC staff (such as driving fleet cars, electricity usage) and emissions from DCC assets or services (such as LPG burnt at DCC pools, landfill gas from Green Island Landfill). It also includes emissions generated by significant suppliers undertaking work on behalf of the DCC, and emissions associated with some goods/consumables used during DCC activities (e.g. chemicals for water treatment).

18 The DCC's organisational emissions reduction targets (as set out in the EMRP) are informed by best practice, specifically Science Based Targets Initiative (SBTi) guidance. The DCC's 'baseline year' (the year against which progress is measured) is 2018/19. Targets are relative to baseline and are as follows:

a) a 2026/27 interim emissions target of a 34.2% reduction in annual tCO_2e emissions compared with baseline year;

b) a 2029/30 target of a 46.2% reduction in emissions compared with baseline year, and

c) a commitment to achieving net zero no later than 2050.

Adherence to the EMRP is a condition of participation in the Local Government Financing Agency's (LGFA) Climate Action Loans programme

19 The DCC's Zero Carbon Policy, EMRP, and annual Greenhouse Gas Emissions Inventory and Management Report (IMR) are submitted to the Local Government Financing Agency's (LGFA) Climate Action Loans programme to enable borrowing at a discounted rate. Aligning the EMRP and targets with best practice, and remaining on track to achieve EMRP targets are prerequisites to maintaining access to the programme.

Zero Carbon implementation plans set out DCC actions to reduce Dunedin's emissions

20 Council resolutions over several years led to the development and adoption of an emissions reduction plan for Dunedin (the Zero Carbon Plan) in September 2023 (CNL/2023/210).

21 The Zero Carbon Plan sets out the overall shifts Dunedin will need to make to become a Zero Carbon city, and within that, action areas for the DCC. Achieving the city's targets will involve a wide range of government, community and business stakeholders: DCC leadership is essential, but partnerships and community activation are also critical to success.

22 Because DCC emissions sources usually form part of the city's emissions, there is integration and overlap between the Zero Carbon Plan and the EMRP. For example, waste entering Green Island landfill is a source of approximately 3% of Dunedin's emissions. Because the DCC owns and manages Green Island landfill waste to landfill is also the DCC's largest emissions source. Actions to reduce emissions from waste are therefore included in both documents.

23 Zero Carbon implementation plans are produced annually to reflect actions to reduce city emissions that can be achieved within adopted annual budgets. Specific timebound projects are presented separately from 'business-as-usual' actions.

24 A Zero Carbon implementation plan for the 2025/26 financial year was noted by Council in September 2025 (CNL/2025/277). This comprised of actions that could be progressed within approved budgets only (i.e. a subset of the indicative action list presented to Council at time of Zero Carbon Plan adoption in 2023).

DISCUSSION

DCC's organisational emissions data 2025/26

A summary of DCC's emissions over the 2025/26 financial year, broken down by emissions source is included in Section 2.1 of the IMR (Attachment A, p21-23). Section 2.2 of the IMR (Attachment A, p23-25) includes an overview of trends by specific emissions sources. Sections 2.3 to 2.4.9 (Attachment A, p26-49) include detailed information by emissions source, along with updates on projects to reduce DCC's emissions. Performance is compared with the same period in both the baseline year and the 2024/25 financial year.The reporting is based on end of financial year data. The data presented is complete and final picture of DCC emissions for the period of 1 July 2025 to 30 June 2026.***Summary of emissions changes for sources included in report***

Overall, DCC's emissions in 2025/26 are:

a) 30.7% lower than in the baseline year, and

b) 1.6% higher than last year.

25 Relative to 2024/25, increased emissions associated with waste to Green Island landfill, composting, and landfilling of sludge from the Tahuna Wastewater Treatment Plant were partially offset by reductions in emissions from stationary energy, water treatment chemicals and wastewater treatment processes. Emissions from closed landfills also continue to reduce year on year.

26 Emissions sources **higher in 2025/26 compared to 2024/25** include:

Emissions source	Change	Explanation
Green Island Landfill emissions	46% lower than baseline; 8% higher than 2024/25 (2,144tCO_2e higher than 2024/25)	Landfill gas management improved slightly in 2025, with 49.8% of landfill gas collected and destroyed in 2025 compared with 49.1% in 2024. These gains were outweighed by the impact of a higher Unique Emissions Factor for Green Island landfill, and a slight increase in waste volumes (2.6%, or 1,418 more tonnes of waste) compared with 2024/25.[1]

[1] **Changes in the Unique Emissions Factor**: The MfE has recently updated Landfill Unique Emissions Factor regulations. This technical accounting change affects calculation of Green Island emissions, as the default emissions per tonne of waste (before landfill gas capture and destruction efficiency is considered) are 12% higher in 2025 compared with 2022-2024. The result of is that certified Green Island landfill emissions for the 2025

Composting emissions	Nil in baseline; 4% higher than in 2024/25 (120tCO_2e higher than 2024/25)	Increase in composting emissions is due to a slight increase in the volume of organic material collected (17,801 tonnes in 2025/26 compared to 17,116 tonnes in 2024/25).
Sludge disposed at private landfill emissions	Emissions 260tCO_2e higher in 2025/26 than 2024/25 (301tCO_2e 25/26 vs 41tCO_2e 24/25). Nil in baseline year	Mainly due to scheduled maintenance of the sludge incinerator at Tahuna Wastewater Treatment Plant, meaning sludge that normally would have been incinerated needed to be deposited at a private landfill.
Staff travel to and from work emissions	Emissions 70tCO_2e higher in 2025/26 than 2024/25, and 125tCO_2e higher than baseline.	Emissions associated with staff travelling to and from work at DCC are estimated as being significantly higher than DCC's fleet emissions. 90% of staff travel emissions were caused by travelling in internal combustion engine and hybrid vehicles. Staff travel survey data indicates many would like to travel by more sustainable modes of transport, however face difficulties in doing so. Achievement of any meaningful reduction in DCC's staff travel emissions will require actions to remove some of the barriers staff currently face when considering whether to bus, walk, cycle or wheel to and from work.

27 In contrast, the following emissions sources were **lower in 2025/26 compared to 2024/25**:

Emissions source	Change	Explanation
Stationary LPG emissions	19% higher than baseline; 7% down compared with 2024/25 (176tCO_2e lower than 2024/25)	Reduction compared to 2024/25 is primarily due to less LPG consumption at Anderson's Bay Crematorium, the Dunedin Public Art Gallery, and Moana Pool. Stationary LPG consumption at Moana Pool decreased by 14% during 2025/26 compared with 2024/25. Reductions in LPG use at Moana Pool over 2025/26 are considered due to energy efficiency gains, through actions such as the repair of water leaks when refurbishing the Lap/Dive Pool, as well as identifying and resolving an issue with a valve in the heat recovery system being plumbed incorrectly.
Stationary diesel emissions	29% lower than baseline; 12% down compared with 2024/25 (74tCO_2e lower than 2024/25)	Sludge incineration at Tahuna WWTP causes the majority of the DCC's stationary diesel consumption. From April to June 2026 the sludge incinerator at Tahuna WWTP underwent scheduled maintenance resulting in a diversion of sludge to a private landfill and thus a reduction in on-site stationary diesel use.

calendar year were 0.513tCO_2e per tonne of waste, higher than the 0.463tCO_2e per tonne of waste applied to calculations in previous years. If the new default emissions per tonne of waste was applied to historic calculations, then waste emissions for 2025/26 would only be 2% higher than in 2024/25 (due to increased waste tonnages).

		Additionally, there was a reduction in stationary diesel consumption at Mosgiel WWTP. This was in part due to the biogas digester being operational at Mosgiel WWTP throughout 2025/26. In previous years stationary diesel was needed in plant processes when the biogas digester was not operational.
Emissions from **water treatment chemicals**	20% lower than baseline; 11% down compared with 2024/25 (212tCO_2e lower in 25/26 compared with 24/25)	Whenever possible the DCC is procuring chemicals locally. In 2025/26 projects to optimise water treatment plant processes have also led to reductions in the total amount of chemicals needed.
Emissions from the **biological treatment of wastewater**	10% lower than baseline; 5% down compared with 2024/25 (497tCO_2e lower than 2024/25)	A significant driver for this development was a rectified a leaky valve which was causing recirculation of wastewater flow at the Green Island Wastewater Treatment Plant. By fixing this, recirculation was reduced which has resulted in reduced power consumption and biological emissions which provides both a cost and emissions benefit.
Emissions from **Refrigerant leakage**	97.5% lower than baseline, 94% down compared with 2024/25 (141tCO_2e lower than 2024/25)	A significant reduction in emissions from refrigerants was achieved in 2025/26 compared with previous years. The reductions were achieved through a combination of more proactive inspections, remote monitored leak detection, as well as upgraded equipment leading to increased operational reliability.
Emissions from **the use of electricity** (including transmission and distribution losses)	37% lower than baseline; 8% down compared with 2024/25 (228tCO_2e lower than 2024/25)	The decrease in emissions from electricity during 2025/26 is primarily due to a higher share of renewable energy sources in electricity generation compared with 2024/25. This increased share of renewables in electricity generation affected the emissions factor for electricity in 2025/26 and led to a decrease in overall emissions from electricity despite an 3.73% increase in electricity consumption compared with the previous year. The 3.73% increase in electricity consumption in 2025/26 compared with 2024/25 is primarily due to the gas engine at Green Island WWTP (which generates electricity using landfill and WWTP gas) not being operational during 2025/26, leading to increased reliance on the national grid to cover Green Island WWTP electricity demand.

Progress reporting for actions in the Zero Carbon implementation plan 2025/26

28 The Zero Carbon implementation plan 2025/26 was noted by Council in September 2025 (CNL/2025/277) and reflects actions to reduce emissions that are provided for by the 9 year plan 2025-34. Most actions were planned to span several years, but all were anticipated to be at least partially progressed within 2025/26. It includes both city-scale ('Zero Carbon Plan') actions, and DCC ('EMRP') actions.

29 The Zero Carbon implementation plan 2025/26 is in two parts:

a) specific timebound projects (56)

b) 'business-as-usual' actions (73, ongoing as part of Council's normal operations, and include advocacy/partnership-based actions, and Zero Carbon Policy implementation actions)

30 Attachments B and C provide end-of-year RAG status and commentary for each action. Progress on each action was assessed using the following RAG criteria (applied with reference to anticipated delivery timeframes at time of the 9 Year Plan 2025-2034 adoption):

Green	Amber	Red
Project is on track to deliver any emissions reduction objectives, and to be completed as scheduled.	Project is not on track to meet emissions reduction objectives, and/or project is subject to minor delays or reduction in scope.	Project will not meet emissions reduction objectives and/or project is subject to major delays or reduction in scope.

31 Attachment B covers the end of year RAG status for timebound projects, and Attachment C business as usual actions.

32 Of the 56 specific timebound projects anticipated to be advanced in 2025/26, 20 are on track ('green'), 18 are subject to delays or minor scope contractions ('amber'), and 18 are subject to major delays or scope contractions ('red', several of these being on hold).

33 Most delays or scope contractions will not have a material impact on emissions reduction goals. However, several projects designed to improve waste diversion rates are currently on hold, which may negatively affect achievement of DCC's 2029/30 emissions reduction target. Relevant projects include:

a) establishment of a centralised hub for resource recovery (supporting both community and construction and demolition resource recovery), three initial community resource recovery centres, and an online platform supporting resource circularity (Zero Carbon Plan actions R1.1.2, R1.1.4, R1.1.5, R1.1.6)

b) priority projects and potential incentives for construction and demolition waste reduction in Dunedin (Zero Carbon Plan actions R1.4.3, R1.4.5, R1.4.6, R1.4.7, R1.4.8, R1.4.9, R1.4.10)

34 From an emissions perspective, reducing waste to landfill is critical to achieving DCC emissions reduction targets. Construction and demolition (C&D) waste (specifically timber) is a large emissions source which the delayed projects are designed to address. Should timber diversion from landfill be maintained at current low rates until 2029/30, this would add an estimated 4,400tCO_2e to DCC's modelled Green Island landfill emissions. This is equivalent to approximately 7% of DCC's total 2025/26 emissions (more than emissions from electricity and LPG use combined), and would result in the DCC overshooting its 2029/30 target.

35 Council consideration of the C&D waste diversion projects has been deferred until 10 Year Plan, to allow budget implications to be considered against other priorities.

36 The delayed projects have been advanced as an integrated whole and all would help towards achievement of emissions reduction targets. Establishment of a centrally-located resource recovery hub is likely to have the greatest and most enduring impact on waste-related emissions and this will also be considered as part of the 10 Year Plan.

37 An options paper regarding Resource Recovery Network options is due to be considered by Council in November 2026.

A Zero Carbon implementation plan 2026/27 has been developed to reflect year 2 of the 9 Year Plan 2025-2034

38 The Zero Carbon implementation plan 2026/27 (Attachment D) reflects actions to reduce emissions that are provided for by the 9 year plan 2025-34 and that are expected to be at least partially progressed this financial year.

39 The Zero Carbon implementation plan is in two parts:

a) specific timebound projects

b) 'business-as-usual' actions.

40 'Business-as-usual' actions are actions that are ongoing as part of Council's normal operations, and include advocacy/partnership-based actions, and Zero Carbon Policy implementation actions.

41 The primary source document for the actions included in the Zero Carbon implementation plan 2026/27 is the original indicative action list presented to Council at time of Zero Carbon Plan adoption. Actions can generally be tracked back to this document using their reference number. However, there are some points of difference:

a) Some actions in the original indicative action list have been superseded by changes in external context, decisions of Council, or work undertaken internally. Where this is the case and an action has required amendment, it has been given a new reference number.

b) Some actions previously anticipated to progress at least partially during 2026/27 have been deferred pending Council decisions on the 2027-2037 Long Term Plan. Most notably in relation to the waste minimisation projects outlined in paragraphs 35-39.

OPTIONS

42 As this report is for noting only, there are no options.

NEXT STEPS

43 A six-month update on DCC's organisational emissions and an update on time-bound projects in the Zero Carbon implementation plan 2026/27 will be presented in early 2027.

Signatories

Author:	Carsten Dortans - Senior Policy Analyst - Zero Carbon Rory McLean - Senior Policy Analyst - Zero Carbon Jefferson Dew - Policy Analyst Zero Carbon
Authoriser:	Scott MacLean - General Manager, City Services

Attachments

	Title	Page
⇨A	DCC Greenhouse Gas Emissions Inventory and Management Report 2025/26 *(Under Separate Cover 1)*	
⇨B	Zero Carbon Implementation Plan 2025/26 - Timebound Projects *(Under Separate Cover 1)*	
⇨C	Zero Carbon Implementation Plan 2025/26 - BAU/Ongoing Actions *(Under Separate Cover 1)*	
⇨D	Zero Carbon Implementation Plan 2026/2027 actions *(Under Separate Cover 1)*	

SUMMARY OF CONSIDERATIONS

Fit with purpose of Local Government

Implementation of the Zero Carbon Policy, Zero Carbon Plan and EMRP promotes the economic, social and environmental wellbeing of communities in the present and for the future, by facilitating the transition to a low carbon economy.

Fit with strategic framework

	Contributes	Detracts	Not applicable
Social Wellbeing Strategy	✓	☐	☐
Economic Development Strategy	✓	☐	☐
Environment Strategy	✓	☐	☐
Arts and Culture Strategy	☐	☐	✓
3 Waters Strategy	✓	☐	☐
Future Development Strategy	✓	☐	☐
Integrated Transport Strategy	✓	☐	☐
Parks and Recreation Strategy	☐	☐	✓
Other strategic projects/policies/plans	✓	☐	☐

Zero Carbon Plan, DCC Emissions Management and Reduction Plan, Zero Carbon Policy

Māori Impact Statement

A Treaty of Waitangi analysis was prepared previously as part of the Zero Carbon work programme. This indicated that, in general, taking action to reduce emissions is aligned with Treaty of Waitangi obligations because a wide range of taonga are at risk from climate change. However, individual projects will need to consider Te Taki Haruru and incorporate mana whenua and mātāwaka inputs when delivered.

Sustainability

Climate change mitigation/emissions reduction efforts are considered key to sustainability. 'Climate Action' is one of the United Nation's Sustainable Development Goals, reflecting the centrality of action on climate change to the achievement of sustainable development. Without significant cuts to emissions, climate change impacts will further accelerate, with commensurate negative impacts on the social, environmental, cultural and economic wellbeing of New Zealand communities. Conversely, actions to reduce emissions generally have significant co-benefits in terms of community wellbeing.

LTP/Annual Plan / Financial Strategy /Infrastructure Strategy

There are no implications from this report for the LTP or Annual Plan, however key dependencies between the 2027-2037 LTP and emissions reduction targets have been outlined in this report.

Financial considerations

There are no financial implications.

Significance

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

Engagement – external

There has been no external engagement as part of developing this report.

SUMMARY OF CONSIDERATIONS
Engagement - internal All lead teams have been consulted to develop the reporting status and associated commentary.
Risks: Legal / Health and Safety etc. As stated in the report, remaining on track to achieve EMRP targets is a prerequisite to maintaining access to the Local Government Financing Authority's Climate Action Loan programme. Nonachievement of targets may pose reputational risk for the DCC.
Conflict of Interest No conflicts of interest have been identified
Community Boards No implications for Community Boards have been identified.

NOTICE OF INTENT - REVIEW OF COASTAL DUNE RESERVES MANAGEMENT PLAN 2010

Department: Parks and Recreation

EXECUTIVE SUMMARY

1 This report seeks approval to commence the public consultation process described in section 41(5) of the Reserves Act 1977 (the Act) to proceed with review of the Coastal Dune Reserves Management Plan (the Plan).

2 The Plan (Attachment A) has not been comprehensively reviewed since it was adopted in July 2010. Since then, legislation, Council policy, reserve management practices and community expectations have changed.

3 Council prepares management plans to guide the use, enjoyment, maintenance, protection, development and preservation of public land, as appropriate.

4 A Statement of Proposal (Attachment B) provides background information on the coastal dune reserves, the existing management plan, and details of the review process.

5 This initial consultation will seek suggestions from mana whenua, community boards, reserve users, stakeholders and the wider community before staff prepare a draft Plan. The consultation and preparation of the draft Plan will be undertaken within existing budgets.

RECOMMENDATIONS

That the Committee:

a) **Approves** the Statement of Proposal (Attachment B)

b) **Approves** commencement of the public consultation process under section 41(5) of the Reserves Act 1977 for the comprehensive review of the Coastal Dune Reserves Management Plan 2010.

BACKGROUND

6 Council adopted the Plan in July 2010 to provide a policy framework for the management, protection, use and development of coastal reserves across the Dunedin district.

7 The Plan currently applies to reserves in Brighton, Island Park, Karitāne, Kuri Bush, Long Beach, Ocean Grove Reserve, Ocean View, Te Rauone, Waikouaiti and Warrington. The extent of these reserves is shown in Appendix 10.2 of the Plan. The review process will provide an opportunity to determine if any additional reserves should be included, or existing reserves removed from management under the Plan.

8 The reserves contain natural, landscape, recreation, cultural and historic values. The Plan provides direction for the administration of the reserves in accordance with the purposes of the Act.

9 Since the Plan was adopted, there have been changes in legislation, Council policy, reserve management practices and community expectations that warrant a comprehensive review of the Plan.

10 The review provides an opportunity to consider current approaches to coastal hazard management, climate change adaptation, biodiversity management, recreation, public access, and the recognition of mana whenua values.

11 The review also provides an opportunity to engage with mana whenua, community boards, reserve users and the wider community to determine whether the objectives and policies of the existing Plan remain appropriate.

12 This report seeks approval of the Statement of Proposal and commencement of Stage 1 public consultation in accordance with section 41(5) of the Act.

DISCUSSION

13 Section 41(5) of the Act requires Council to give public notice of its intention to prepare a reserve management plan, or of its intention to review a reserve management plan comprehensively. This public notice must "*invite persons or organisations interested to send the administering body written suggestions within a time specified in the notice"* (s41(5)(b) Reserves Act 1977).

14 Council carries out community engagement in two stages. The first stage seeks community input before staff prepare a new plan or review an existing plan.

15 Staff have allocated 20 working days for this initial engagement period. Staff will use the Stage 1 feedback to prepare a draft reserve management plan.

16 Staff will then report the draft Plan to the Policy and Planning Committee to seek approval under section 41(6) of the Reserves Act 1977, to *"give public notice… stating that the draft plan is available for inspection at a place and times specified in the notice, and calling upon persons or organisations interested to lodge with the administering body written objections to or suggestions on the draft plan before a specified date, being not less than 2 months after the date of publication of the notice; and give notice in writing as far as practicable, to all persons and organisations who or which made suggestions to the administering body under subsection (5)."*

17 In the second stage, submitters can provide feedback on the draft management plan. The Hearings Committee will consider Stage 2 submissions and recommend any changes before the final Plan is presented to Council for adoption.

18 This report seeks approval of the Statement of Proposal and commencement of Stage 1 of public consultation.

OPTIONS

Option One – Recommended Option

The Committee approves the Statement of Proposal and commencement of the review of the Coastal Dune Reserves Management Plan 2010, including public notification under section 41(5) of the Reserves Act 1977.

Advantages

- Council commences the statutory review process.
- Community, mana whenua, community boards and stakeholders are able to provide input into the review.
- Feedback informs preparation of the draft management plan.

Disadvantages

- Staff resources are required to undertake consultation and prepare the draft Plan.

Option Two – Status Quo

19 The Committee does not approve commencement of the review and public consultation at this time.

Advantages

- No staff resources are required at this time to undertake the comprehensive review or associated consultation.

Disadvantages

- Current management issues cannot be considered through an updated statutory management plan.
- Opportunities to incorporate updated approaches to coastal reserve management would be deferred.

NEXT STEPS

20 If approved, staff will follow the public consultation process described by section 41(5) of the Act.

- A public notice will appear in the Otago Daily Times, supported by a broader media release.
- Council will publish notices through its social media channels.
- Council will list the management-plan review as a consultation project on its website.
- Staff will contact known users and stakeholders of the affected coastal reserves directly.

Signatories

Author:	Katie Eglesfield - Parks and Recreation Planner John Brenkley - Planning and Partnerships Manager
Authoriser:	Heath Ellis - Group Manager Parks and Recreation Scott MacLean - General Manager, City Services

Attachments

	Title	Page
⇨A	Coastal Dune Reserves Management Plan *(Under Separate Cover 1)*	
⇨B	Statement of Proposal - Review of Coastal Dune Reserves Management Plan 2010 *(Under Separate Cover 1)*	

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 well-being of communities in the present and for the future.
This decision promotes the economic well-being of communities in the present and for the future.
This decision promotes the environmental well-being of communities in the present and for the future.
This decision promotes the cultural well-being of communities in the present and for the future.

Fit with strategic framework

	Contributes	Detracts	Not applicable
Social Wellbeing Strategy	✓	☐	☐
Economic Development Strategy	☐	☐	✓
Environment Strategy	✓	☐	☐
Arts and Culture Strategy	☐	☐	✓
3 Waters Strategy	☐	☐	✓
Future Development Strategy	✓	☐	☐
Integrated Transport Strategy	✓	☐	☐
Parks and Recreation Strategy	✓	☐	☐
Other strategic projects/policies/plans	☐	☐	✓

The city's parks and reserves contribute to the wellbeing of the community. The public consultation process for preparing a new management plan enables the community to provide input into the management of public land. Management plans also provide an opportunity to evaluate biodiversity and ecological values and support improvements to the environment.

Māori Impact Statement

Mana whenua, through Aukaha, have been invited to advise on this project. This is in line with Autūroa (environmental and cultural), Auora (environmental and cultural), and Autikaka (cultural) of Te Taki Haruru. The development of reserve management plans provides mana whenua with an opportunity to reinforce the cultural narratives relative to place and to provide their whakaaro in managing these areas within the plan. The review, if approved, provides an opportunity for Council to check the plan aligns with the Ngāi Tahu Claims Settlement Act 1998, and that it integrates mana whenua values and principles from the KTKO Natural Resource Management Plan 2005.

Sustainability

A management plan may provide guidance on investment in infrastructure, supporting and sustaining inclusive community use and cultural values, and protecting and enhancing natural ecosystems.

LTP/Annual Plan / Financial Strategy /Infrastructure Strategy

Preparation of the draft Plan and associated engagement have no implications for the current LTP, Annual Plan, Financial Strategy or Infrastructure Strategy. Once adopted, the Plan may identify projects with future operational or capital budget implications that would be subject to further Council approval.

Financial considerations

No additional funding is sought. Staff will meet the costs of consultation and preparation of the draft Plan from the existing Parks and Recreation Services operating budget for 2026/27.

SUMMARY OF CONSIDERATIONS

Significance

The decision is considered low in terms of the Council's Significance and Engagement Policy because it initiates consultation and does not itself adopt a new management plan, alter reserve status or commit Council to additional expenditure.

Engagement – external

The notice of intent specifically relates to engagement. External groups are expected to include:

- Adjacent landowners
- Community and residents' associations
- Environmental and conservation organisations
- Recreation user groups (including walking, cycling, surfing, fishing, horse riding and other reserve users, where applicable)
- Utility providers and infrastructure operators where reserve interests overlap
- Relevant government agencies
- Members of the public.

Engagement - internal

- Parks and Recreation Services staff work closely with other departments with the creation of management plans. Internal groups are expected to include:Mana Ruruku
- Parks and Recreation Operations
- Climate Adaptation and Resilience
- Coastal specialists
- Transport
- Property Services
- 3 Waters
- Biodiversity and ecological specialists

Risks: Legal / Health and Safety etc.

No significant risks have been identified in commencing consultation. Staff will manage the statutory and resourcing requirements through project planning and delivery within existing Parks and Recreation Services budgets.

Conflict of Interest

There are no known conflicts of interest.

Community Boards

Saddle Hill, Otago Peninsula, West Harbour, and Waikouaiti Coast Community Boards all have an interest in the review and development of a new Coastal Dune Reserves Management Plan.

The Community Boards have been advised of the intention to review the Plan and will be engaged as key stakeholders in preparing the draft Plan, subject to approval.

ITEMS FOR CONSIDERATION BY THE CHAIR

Any items for consideration by the Chair.

KARAKIA WHAKAMUTUNGA

The meeting will close with a Karakia Whakamutunga.