

Report No.	25-93
Decision Required	

HORIZONS SUBMISSIONS ON RESOURCE MANAGEMENT REFORM PHASE 2 - INTEGRATED NATIONAL DIRECTION PACKAGE

1. PURPOSE

1.1. The purpose of this item is to:

- a) Inform elected members about the contents and implications of the integrated national direction package (Phase 2 of the Government's **Resource Management (RM)** reform)
- b) Seek endorsement of the proposed high-level policy positions.
- c) Seek agreement to delegate approval of the final submissions to the Chair.

2. EXECUTIVE SUMMARY

2.1. The Government is consulting on changes to a number of existing Resource Management Act national direction instruments, and is proposing several new instruments. The infrastructure and development changes are intended to enable infrastructure and development where it is needed, while managing its effects on people and the environment. They are aimed at improving opportunities and choice for housing and support development in areas that reduce risks from natural hazards. The primary industry changes are intended to reduce restrictions on the primary sector. The freshwater changes are intended to rebalance freshwater direction to better reflect the interests of all water users, and reduce complexity and give councils more flexibility in how they implement this direction.

3. RECOMMENDATION

It is recommended that Council:

- a. receive the information contained in Report No. 25-93.
- b. endorse the proposed high-level policy positions set out in Annex 1.
- c. Delegate authority to the Chair to approve the final submissions.

4. FINANCIAL IMPACT

4.1. There is no direct financial impact associated with this item other than staff time to analyse, gather feedback and draft the submissions. However, the outcomes of this consultation and the broader RM reform programme, is likely to have a significant financial impact on Horizons' One Plan review and regulatory work programmes.

5. COMMUNITY ENGAGEMENT

- 5.1. No community engagement has been carried out on the national direction package by Horizons.
- 5.2. The final submissions will be made publicly available as part of the consultative process carried out by the **Ministry for the Environment (MfE)**.

6. SIGNIFICANT BUSINESS RISK IMPACT

- 6.1. No significant business risk associated with this item has been identified.

7. CLIMATE IMPACT STATEMENT

7.1. Package 1 – infrastructure and development

7.1.1. The **Regulatory Impact Statement (RIS)** considers that the amendments to the infrastructure and electricity national instruments are required to ensure the resource management system delivers on New Zealand's climate critical infrastructure needs. The RIS draws on NZ Infrastructure Commission research which estimates that New Zealand is on track to miss between around 30 per cent of the emission reductions required from the energy and transport sectors by 2050 due to consenting constraints and delays.

7.1.2. In its *New Directions for Resource Management in New Zealand (2020)* report, the Resource Management Review Panel found a lack of clear national direction has led to issues with the management of significant effects from natural hazards and climate change. This impacts the extent to which local authorities' plans address and manage these risks. The proposed NPS for Natural Hazards is intended to provide an incremental step towards improving natural hazard management and addressing the issues raised in this report.

7.2. Package 2 – primary sector

7.2.1. The RIS for proposals on instruments for primary sector states one of the objectives is making it easier to get things done while adapting to the effects of climate change and reducing the risks from natural hazards. No significant climate impacts are stated in the RISs.

7.3. Package 3 - freshwater

7.3.1. The RIS for proposals on water security and storage aim to increase New Zealand's resilience to climate change, including through reduced exposure to climate-related events such as drought, as the climate changes and the natural availability of water declines or becomes more unpredictable.

7.3.2. The RIS for proposals on wetland provisions note that the MfE consider wetland mapping can be achieved by central government as part of climate mitigation work.

7.3.3. No other RISs on package 3 directly mentioned the climate impact of the proposals.

8. BACKGROUND

8.1. The Government is taking a phased approach to the reform of the resource management system as part of the Coalition Government's commitment as part of the National Party and Act Party Coalition Agreement to replace the **Resource Management Act 1991 (RMA)** with resource management laws premised on the enjoyment of property rights as a guiding principle. Cabinet agreed that the new RM system will make it easier to get things done by:

- Unlocking development capacity for housing and business growth.
- Enabling delivery of high-quality infrastructure for the future, including doubling renewable energy.
- Enabling primary sector growth and development, including aquaculture, forestry, pastoral, horticulture, and mining.

8.2. Cabinet agreed that the system must achieve those objectives while also:

- Safeguarding the environment and human health.

- Adapting to the effects of climate change and reducing the risks from natural hazards.
- Including regulatory quality in the system.
- Upholding Treaty of Waitangi settlements and other related arrangements.

8.3. Phase 1

8.3.1. Phase 1 of RM reform consisted of the repeal of the Natural and Built Environment Act and the Spatial Planning Act in December 2023.

8.4. Phase 2

8.4.1. Phase 2 is comprised of the Fast-track Approvals Act 2024, the Resource Management (Freshwater and Other Matters) Amendment Act 2024, the Resource Management (Consenting and Other System Changes) Amendment Bill, and the integrated national direction package.

8.4.2. Fast-track Approvals Act 2024

- The Fast-track Approvals Bill was introduced to Parliament in March 2024. Horizons submitted on the Bill. The Bill went to the Environment Select Committee before passing its final readings and becoming law in December 2024.
- The Act's one-stop-shop approach consolidates and speeds up the multiple approvals processes under different legislation for large and/or complex projects if they meet the eligibility criteria.

8.4.3. Resource Management (Freshwater and Other Matters) Amendment Act 2024 (RM Bill 1)

- The Act (formerly known as RM Bill 1) was introduced to Parliament in May 2024. Horizons made a submission on the Bill. The Bill then went to the Primary Production Select Committee before coming into force in October 2024.
- The Act amended the RMA and several national direction instruments with nine key changes:
- Exclude the hierarchy of obligations in the **National Policy Statement for Freshwater Management (NPSFM) 2020** from resource consenting.
- Repeal the low slope map and associated requirements from the **Resource Management (Stock Exclusion) Regulations 2020 (Stock Exclusion Regulations)**.
- Repeal the permitted and restricted discretionary activity regulations and associated conditions for intensive winter grazing from the **Resource Management (National Environmental Standards for Freshwater) (NESF) 2020** and replace these with new regulations for setbacks from waterways and critical source areas.
- Align the provisions of coal mining with other mineral extraction activities under the **National Policy Statement for Indigenous Biodiversity 2023 (NPSIB)**, NPSFM, and NESF.
- Suspend the requirements under the NPSIB for councils to identify new **Significant Natural Areas (SNA)** and include them in district plans, and extend some SNA implementation timeframes.
- Speed up and simplify the process for preparing and amending national direction.
- Clarify councils' ability to consent discharges that would result in significant adverse effects.
- Pause the rollout of freshwater farm plans until work to improve the system is finalised.

- Restrict notification of freshwater planning instruments (regional policy statements and regional plans that give effect to the 2020 NPSFM until a new NPSFM takes effect or 31 December 2025.

8.4.4. Resource Management (Consenting and Other System Changes) Amendment Bill (RM Bill 2)

- The Bill was introduced in December 2024 and has been referred to the Environment Select Committee for consideration. Horizons made a submission on the Bill.

The Bill can be grouped into four packages:

- The infrastructure package, which includes extended consent durations and lapse periods for renewable electricity activities and extended durations of port coastal permits
- The housing package, which includes allowing councils to opt out of or modify the Medium Density Residential Standards and enables councils to use the streamlined planning process to de-list heritage buildings
- The farming and primary sector package, which includes changes to certification and auditing of freshwater farm plans, reduced overlap between the RMA and the Fisheries Act 1996 and enabling changes to consent conditions for aquaculture; and
- The systems improvements and natural hazards package, which makes changes to emergency provisions under the RMA, clarifies and strengthens councils’ ability to decline land-use consents or impose relevant conditions where there is significant natural hazard risk, and provides consenting efficiencies, including by clarifying the scope of further information requests.

8.4.5. Integrated national direction package

- This item is intended to inform Horizons’ submissions on the integrated national direction package.
- In November 2024, the Government confirmed for February 2025, a refocused package of national direction under the RMA to be progressed as part of Phase 2, focusing on proposals with an immediate effect on the resource management system while Phase 3 is progressed. In March 2025, the timing of these packages was reconfirmed for mid-2025.
- On Thursday 29 May, consultation opened for the first three packages of phase 2; infrastructure and development, primary sector, and freshwater.
- Summary of the instruments within each package (package 4 yet to be released):

	Package 1 – Infrastructure and development	Package 2 – Primary sector	Package 3 – Freshwater
Amended National Policy Statements (NPS)	Renewable Electricity Generation Electricity Transmission (renamed Electricity Networks)	New Zealand Coastal Policy Statement Highly Productive Land Indigenous Biodiversity (mining and quarrying provisions) Freshwater (mining and quarrying provisions)	Freshwater
Amended	Electricity Transmission	Marina Aquaculture	Freshwater

National Environmental Standards (NES)	Activities (renamed Electricity Network Activities) Telecommunication Facilities	Commercial Forestry Stock Exclusion Regulations Freshwater (mining and quarrying provisions)	
New Instruments	NPS for Infrastructure NES for Granny Flats (Minor Residential Units) NES for Papakāinga NPS for Natural Hazards		Option for NES Commercial Vegetable Growing Option for NES Water Security and Storage
Consultation type	Statutory (under RMA s46A)	Statutory (under RMA s46A)	Non-statutory
Next steps	Gazettal. Immediate effect on consenting, no deadline for plan changes.	Gazettal. Immediate effect on consenting, no deadline for plan changes, except for NPSHPL.	Statutory consultation then gazettal. Government is consulting on implementation timeframes.

8.5. Phase 3

- 8.5.1. In March 2025, the Blueprint for Resource Management Reform was publicly released which contained the Expert Advisory Group recommendations on RM reform. Cabinet has made recommendations on whether to proceed with the EAG recommendations or not.
- 8.5.2. The government is proposing to replace the RMA with two new pieces of legislation: the Natural Environment Act, focused on managing the natural environment; and the Planning Act, focused on planning to enable development and infrastructure. Both Acts will be based on the enjoyment of property rights and reduced regulatory scope. Each Act will contain national goals and a set of national policy direction.
- 8.5.3. It is proposed that Regional Policy Statements will be eliminated and replaced in part by mandatory Regional Spatial Plans that will enable development and will focus on mapping major constraints, identifying existing and future infrastructure, future urban growth areas, and growth and development opportunities.
- 8.5.4. The Government aims to introduce the Bills in late 2025 and pass these into law in mid-2026 with implementation beginning in 2027. The Select Committee process will be the primary consultative mechanism.

9. PACKAGE 1 – INFRASTRUCTURE AND DEVELOPMENT

- 9.1. The infrastructure and development package aims to make it easier for councils to plan and deliver infrastructure. It proposes a new **National Policy Statement for Infrastructure (NPSI)**, amendments to the **National Policy Statement for Renewable Electricity Generation 2011 (NPSREG)**, amendments to the **National Policy Statement on Electricity Transmission 2008 (NPSET)** which is proposed to be renamed National Policy Statement for Electricity Networks, amendments to the **Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA)** which is proposed to be renamed National Environmental

Standards for Electricity Network Activities, amendments to the **Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 (NESTF)**, new **National Environmental Standards for Granny Flats (Minor Residential Units) (NESGF)**, new National Environmental Standards for Papakāinga, and a new **National Policy Statement for Natural Hazards (NPSNH)**.

- 9.2. The proposals include new and amended rules to clarify where consent is required in district, unitary or regional plans and targeted national policy direction to support resource consent and plan-making processes.
- 9.3. The infrastructure and development package is statutory consultation under s46A of the RMA and contains draft provisions as part of the consultation
- 9.4. This package mostly aligns with the intent of existing One Plan provisions, except in relation to Natural Hazards.
 - 9.4.1. This package departs from our current approach for consent decision-making in relation to natural hazards. The NPSNH presents a fundamental departure from existing processes with new developments (including extensions).
- 9.5. See the [Factsheet for Package 1: Infrastructure and development](#).
- 9.6. See the [Discussion document for Package 1: Infrastructure and development](#).
- 9.7. The Discussion document also lists the proposed provisions in Section 6. These show the proposed objectives and policies for the new instruments and proposed changes to existing instruments:
 - [Attachment 1.1: Proposed provisions – New National Policy Statement for Infrastructure](#)
 - [Attachment 1.2: Proposed provisions – Amendments to the National Policy Statement for Renewable Electricity Generation 2011](#)
 - [Attachment 1.3: Proposed provisions – Amendments to the National Policy Statement on Electricity Transmission 2008](#)
 - [Attachment 1.4: Proposed provisions – Amendments to the Resource Management \(National Environmental Standards for Electricity Transmission Activities\) Regulations 2009](#)
 - [Attachment 1.5: Proposed provisions – Amendments to the Resource Management \(National Environmental Standards for Telecommunication Facilities\) Regulations 2016](#)
 - [Attachment 1.6: Proposed provisions – New National Environmental Standards for Granny Flats \(Minor Residential Units\) Regulations](#)
 - [Attachment 1.7: Proposed provisions – New National Environmental Standards for Papakāinga](#)
 - [Attachment 1.8: Proposed provisions – New National Policy Statement for Natural Hazards](#)
- 9.8. See Annex 1 for high level position statements that have been developed with council officers and workshopped with elected members.

10. PACKAGE 2 – PRIMARY SECTOR

- 10.1. The primary sector package aims to enable growth in the primary sector. It proposes amendments to the **Resource Management (National Environmental Standards for Marine Aquaculture) Regulations 2020 (NESMA)**, amendments to the **Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 (NESCF)**, amendments to the **New Zealand Coastal Policy Statement 2010 (NZCPS)**, amendments to the **National Policy Statement for Highly Productive**

- Land 2022 (NPSHPL)**, amendments to the Stock Exclusion Regulations, and amendments to mining and quarrying provisions in the NPSIB, the NPSHPL, the NPSFM, and the NESF.
- 10.2. The proposals include new and amended rules to enable activities, and clarify where consent is required in district, unitary or regional plans
- 10.3. The primary sector package is statutory consultation under s46A RMA and contains draft provisions as part of the consultation.
- 10.4. This package may introduce changes to how we work and therefore presents uncertainty with how these instruments align with the intent of existing One Plan provisions. Especially for:
- Amendments proposed for the NESCF that look at repealing councils' discretion to have more stringent rules to control afforestation. It is likely there will need to be a plan amendment or process to de-conflict the One Plan with any gazetted changes in this instrument.
 - Further removal of requirements under the Stock Exclusion Regulations 2020. The proposal looks to remove the requirement to exclude grazed beef cattle and deer in low intensity farming systems from wetlands which support a population of threatened species. Of note, the One Plan is silent on this matter.
 - The implementation and mapping of highly productive land (HPL). Proposed amendments look to remove LUC3 from the definition (either for urban development or for both urban development and rural lifestyle) as well as including new protection for special agricultural areas that will likely include areas in Horowhenua.
- 10.5 See the [Factsheet for Package 2: Primary sector.](#)
- 10.6 See the [Discussion document for Package 2: Primary sector.](#)
- 10.7 The Discussion document also lists the proposed provisions in Section 6. These show the proposed objectives and policies for the new instruments and proposed changes to existing instruments:
- [Attachment 2.1: Proposed provisions – Amendments to the Resource Management \(National Environmental Standards for Marine Aquaculture\) Regulations 2020](#)
 - [Attachment 2.2: Proposed provisions – Amendments to the Resource Management \(National Environmental Standards for Commercial Forestry\) Regulations 2017](#)
 - [Attachment 2.3: Proposed provisions – Amendments to the New Zealand Coastal Policy Statement 2010](#)
 - [Attachment 2.4: Proposed provisions – Amendments to the National Policy Statement for Highly Productive Land 2022](#)
- 10.8 Quarrying amendments to:
- [Attachment 2.5: Proposed provisions – Amendments to the National Policy Statement for Indigenous Biodiversity 2023](#)
 - [Attachment 2.6: Proposed provisions – Amendments to the National Policy Statement for Freshwater Management 2020 and the Resource Management \(National Environmental Standards for Freshwater\) Regulations 2020](#)
 - [Attachment 2.7: Proposed provisions – Amendments to the Resource Management \(Stock Exclusion\) Regulations 2020](#)
- 10.9 See Annex 1 for high level position statements that have been developed with council officers and workshopped with elected members.

11. PACKAGE 3 – FRESHWATER

- 11.1. The freshwater package is non-statutory consultation, seeking feedback on options to amend the NPSFM and NESF, as well as options for new **National Environmental Standards (NES) for commercial vegetable growing (CVG)**, and water security and storage. Further consultation is expected later in 2025, including through an exposure draft of the proposed replacement NPSFM.
- 11.2. The consultation document seeks feedback on whether any of the changes in the discussion document should be implemented now, or if they should instead be incorporated into, or made under, the upcoming replacement legislation for the RMA.
- 11.3. It is unclear in many instances how this package aligns in intent with existing One Plan provisions. With such broad and wide ranging topics covered in this discussion document, it will be important to follow the next steps of subsequent statutory consultation. The proposals test changes to the:
 - 11.3.1. NPSFM that include rebalancing Te Mana o te Wai, provisions for commercial vegetable growers, enabling water storage, amending wetland regulations, drinking water protection and flexibility for the National Objectives Framework.
 - 11.3.2. NESF that include amendments to fish passage requirements, wetland and culverts and synthetic nitrogen fertiliser requirements.
- 11.4. The Government is seeking feedback on the potential impacts on Māori rights and interests and Treaty settlements. They are also seeking feedback on any additional perceived impacts of the proposals on sites of significance to Māori, marae, Māori land, land returned under Treaty settlements, or other matters of significance to Māori groups.
- 11.5. See the [Factsheet for Package 3: Freshwater](#)
- 11.6. See the [Discussion document for Package 3: Freshwater](#)
- 11.6.1. As this is not statutory consultation, there are no proposed provisions provided for this package.
- 11.7. See Annex 1 for high level position statements that have been developed with council officers and workshopped with elected members.

12. PACKAGE 4 – GOING FOR HOUSING GROWTH

- 12.1. At the time of writing, the housing growth package was expected in early June but had not yet been released for consultation. The aim of the package is to free up land for development and remove unnecessary planning barriers.
- 12.2. It has been indicated that the package will contain amendments to the National Policy Statement on Urban Development 2020 and a broader housing policy package.
- 12.3. The outcomes of this consultation are intended to be incorporated into the replacement RM system at the start of 2027, including by making use of new system tools such as standardised zones and spatial planning.

13. STAFF ENGAGEMENT ON SUBMISSION DEVELOPMENT

- 13.1. Engagement has occurred, and will continue to occur as the submissions are developed, with officers from the Policy, Strategy & Climate Resilience, Science, Regulatory, District Advice, Land and Partnerships, Freshwater and Projects, and Environmental Data teams.

14. TIMELINE / NEXT STEPS

24 June 2025

- 14.1. Submissions on packages 1, 2, and 3 close on Sunday 27 July 2025. Officers will ensure the submissions are submitted by Friday 25 July 2025.
- 14.2. The changes proposed in Packages 1 and 2 are expected to be gazetted later this year. These targeted changes are being progressed for their immediate impact on the resource management system (particularly resource consenting), without directing the requirement for direct insertion in plans or plan changes. The policy intent of all the National Direction proposals is intended to flow through into the new resource management system.
- 14.3. Statutory consultation for the freshwater package is expected later this year, including through an exposure draft of the replacement NPSFM. The Government is consulting on whether the changes should be implemented now, or through Phase 3 of RM Reform
- 14.4. Package 4 – Going for Housing Growth will be implemented through Phase 3.
- 14.5. The freshwater farm plan system is expected to be finalised by the end of 2025.
- 14.6. The Bills to replace the RMA are expected to be introduced in late 2025, with a Select Committee consultative process, and passed into law in mid-2026.

15. SIGNIFICANCE

- 15.1. This is not a significant decision according to the Councils' Significance and Engagement Policy 2023.

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ANNEXES

There are no attachments for this report.