

25 July 2025

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Timaru District Council Submission on Package 1 – Infrastructure and Development

Introduction

Timaru District Council welcomes the opportunity to submit on the governments National Direction proposals. Council is supportive of the intent of many of the changes and recognise the necessity of a better developed and more comprehensive national direction package.

We address the key issues for Timaru District Council below, which focuses on the general policy intent of the instruments as proposed. Additionally, the attached Appendix 1 respond to the key questions contained within Package 1 discussion document.

Key Issues

Timaru District Council has a strong interest in matters relating to both urban development and rural land uses. Council has been consistent in making submissions to both national and regional processes, around the importance of enabling mid-sized Council's such as Timaru, the ability to be proactive and responsive to change and economic opportunities that enable us to be a district of choice and opportunity.

Clear direction that relates to Council's role in the provision of infrastructure and development is therefore an important matter for Timaru District Council. We address our key issues in relation to this matter below with a focus on the general policy intent of the instruments proposed for change.

We ask that the Government be cognisant of these issues when making decisions on all national direction instruments. A key failure of previous instruments has been their inability to work together in an effective manner to achieve better outcomes for communities.

Key Issue 1: Scale and pace of change creates risk of unintended outcomes or significant implementation challenges.

While many of the proposals are commendable, the immediate costs of implementing the requirements they impose may be disproportionate to the intended gains. Timaru District Council is nearing the end of a lengthy review process of its current district plan, and we are concerned that additional Schedule 1 process will be required in the near future.

We support the approach that as far as possible, requirement to consider or have regard to additional policy direction is clearly outlined, and that the national direction has clear implementation and timelines, with any 'plan making processes' deferred until the new system is in place or occurs concurrently with the transition.

Council supports clear direction around the implementation of this direction in consenting processes until such time as the new system is fully implemented.

Key Issue 2: Ensuring unresolved policy gaps and interactions across the package are resolved. If the instruments only 'talk to each other' and do not provide a hierarchy, there is an assumption that all objectives can be balanced.

The proposal responds to specific government priorities. While we recognise the need for, and indeed support, greater government direction on a range of issues, we are concerned that there will still be challenges associated with balancing and prioritising issues.

Planning as a profession, and in regulatory practice tends to fall into the trap of being 'everything to everyone'. The current national direction system has examples that cut through this tendency, by giving decision makers clear things that they must achieve, for example, the NPS-UD.

As proposed, the national direction packages as a whole risk returning the profession to the 'everything to everyone' mentality. For example, the proposed NPS's for Natural Hazards, and Infrastructure, alongside existing direction such as the NPS for Highly Productive Land create a situation where councils are expected to enable development, while also:

- Not enabling activities which may affect infrastructure development (e.g. by resulting in reverse sensitivity effects); and
- Ensuring we do not reduce the availability of Highly Productive Land; and
- Managing or preventing activities at significant risk from natural hazards; and
- Addressing a range of worthy technical matters, for example contaminated land.

Addressing each of these matters adds cost, complexity, and time to decision making, and ultimately can restrict development.

The instruments (current and proposed) need to do more than simply 'talk to each other'. There needs to be a clear hierarchy of what objectives are more important than others and in what situations. Ideally, this results in clear prioritisation as to when one

objective falls away and is not considered, and what costs are acceptable to impose through planning provisions.

If the instruments only 'talk to each other' and do not provide a hierarchy, there is an assumption that all objectives can be balanced. In a situation where relevant instruments are not balanced, Council as a regulator, will be in the position of introducing more and more provisions to attempt to satisfy the requirement of each individual piece of national direction.

Key Issue 3: The sheer number of different national direction instruments relating to similar matters will require expertise to implement

Whilst additional national direction that provides clearer outcomes is supported; the number of these documents is concerning as many Councils such as Timaru will not interact with these documents on a day-to-day basis and will require expertise to implement effectively. Council encourages the Government to ensure appropriate resources are available to all parties in rolling out the implementation of these documents.

Key Issue 4: National Direction Instruments can have unintended consequences for smaller Councils impacting on their ability to compete with bigger centres.

A 'one size fits all' approach inevitably does not work for all local authorities. Timaru's experience is that this type of approach will result in unintended consequences, which often disproportionately affect councils outside of larger urban centres. This creates a greater divide between rural and provincial centres versus large urban areas.

Timaru District Council has concerns that the proposals will continue to result in an inability for smaller Councils to be responsive to growth demand. The NPS-HPL has been a restrictive instrument in allowing communities within the Timaru District to grow due to requirements around demonstrating high levels of growth. Whilst removing LUC 3 classifications will create more opportunities areas of LUC 2 land will still adjoining urban boundaries creating barriers to achieving aspirational growth.

Key Issue 5: National Direction Instruments need to be proportionate to the effects that are sought to be managed.

Council would like to emphasise that some land use activities will always need to co-exist with infrastructure activities and that this should be allowed to continue. Concerns would be had if farming activities were to be further limited to protect electricity distribution networks.

Additionally, where infrastructure works are essential to support a community, they should be enabled. Council would encourage infrastructure projects such as new water lines etc. to be enabled where they are responding to immediate needs such as a boil water notice. Whilst such occurrences do not meet the 'emergency works' definitions they are essential to supporting communities and are an emergency to those effected.

Conclusion

Timaru District Council is grateful for the opportunity to provide feedback and welcome the opportunity to be further involved in discussing any matters raised in our submission.

If you have any questions regarding the content of this submission, please contact Paul Cooper by email at paul.cooper@timdc.govt.nz.

Yours sincerely



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Appendix 1 – Infrastructure and Development Questions and Responses

National Policy Statement for Infrastructure	
Question	Response
Is the scope of the proposed NSP-I adequate?	Yes, the inclusion of social infrastructure is seen to be a progressive step and reduces the need for Council's to recognise facilities such as waste disposal facilities through other planning mechanisms such as designations.
Do you agree with the definition of 'infrastructure', infrastructure activities' and 'infrastructure supporting activities' in the NPS-I?	Generally, the definition of infrastructure and infrastructure activities is supported. Have concerns that the definition of infrastructure supporting activities is too broad and would benefit from some direction around being within an appropriate geographical vicinity to 'infrastructure' or 'infrastructure activities'.
Does the proposed objective reflect the outcomes sought for infrastructure?	Generally, the proposed objective is supported.
Does the proposed policy adequately reflect the benefits that infrastructure provides?	Generally, the proposed policy is supported. It is noted that the policy could still be read as focussing on traditional infrastructure and that there would be benefit in providing more focus on the social infrastructure.
Does the proposed policy sufficiently provide for the operational and functional needs of infrastructure to be located in particular environments?	Yes, the policy provides clear direction.
Do you support the proposed requirement for decision-makers to have regard to spatial plans and strategic plans for infrastructure?	Concerns are held in relation to b) and in particular the consideration of spatial and master plans prepared by the infrastructure provider and provided to the consent authority. It is suggested that there should be a higher threshold as such plans may be prepared in isolation by individual providers who do not see the big picture.

Would the proposed policy help improve the efficient and timely delivery of infrastructure?	It is questionable that the proposed policy will improve efficiency and timely delivery of infrastructure, where in this Council's experience the speed of decisions often relies on the quality of information submitted. It would be beneficial if clearer direction was provided on the information thresholds that the applicant must include.
Does the proposed policy adequately provide for the consideration of Māori interests in infrastructure?	The proposed policy is considered to adequately provide for the consideration of Māori interests in infrastructure.
Do the proposed policies sufficiently provide nationally consistent direction on assessing and managing the adverse effects of infrastructure?	Concerns are held that the policy avoids providing clear direction around section 6 matters.
Do the proposed policies sufficiently provide for the interface between infrastructure and other activities including sensitive activities?	Yes, however, it is questioned why each local authority must engage to identify things such as appropriate buffers. Concerns are held that this will mean each local authority has to litigate matters which could be managed via a national standard i.e. setback from existing overhead power lines.

National Policy Statement for Renewable Energy	
Question	Response
Do you support the proposed amendments to the objective of the NPS-REG?	Yes, the proposed objective provides clear direction.
Are the additional benefits of renewable electricity generation helpful considerations for decisionmakers? Why or why not?	Yes, they are helpful in providing guidance, however, there may be some aspects which prove to be unhelpful for example what is a temporary and reversible adverse effect?
Does the proposed policy sufficiently provide for the operational and functional need of renewable electricity generation to be located in particular environments?	It is believed that an opportunity is lost for this NPS to speak to the NPS-I. The operational and functional needs do not speak to the environment, nor does it speak to the supporting infrastructure that is needed. The reality is that REG

	activities will often be located in areas captured by section 6 and will create a tension, it is felt that this is not sufficiently addressed.
Do the proposed new and amended policies adequately provide for existing renewable electricity generation to continue to operate?	Concerns are held that the policies avoid providing clear direction around section 6 matters. P3 could be strengthened by applying this policy to all environments, including areas captured by section 6.
Do the proposed policy changes sufficiently provide for Māori interests in renewable electricity generation?	The proposed policy is considered to adequately provide for the consideration of Māori interests in REG activities.
Do you support the proposed policy to enable renewable electricity generation development in areas not protected by section 6 of the RMA, or covered by other national direction?	Yes, enabling REG activities in areas not protected by section 6 of the RMA, or covered by other national direction will help achieve the Government's Electrify NZ programme and recognises the benefits of REG in appropriate locations.

National Policy Statement for Electricity Transmission	
Question	Response
Do you support the inclusion of electricity distribution within the scope of the NPS-EN?	Timaru District Council generally support including the electricity distribution network within the scope of the NPS-EN.
Are there risks that have not been identified?	No additional risks have been identified.
Do you support the proposed definitions in the NPS-EN?	Generally, the definitions in the NPS-EN are supported.
Are there any changes you recommend to the NPS-EN?	No other changes are recommended to the NPS-EN.
Do you support the proposed objective? Why or why not?	Generally, support the objective as it recognises the importance of EN while making it clear that EN must manage adverse effects on the environment. Concern that 'proportionate' and 'cost-effective' is subjective and do not provide certainty regarding environmental protection.

Will the proposed policy improve the consideration of the benefits of electricity networks in decision making?	Yes, the proposed policy direction is helpful and will provide clear guidance to decision makers while making it clear that other benefits can be considered.
Does the proposed policy sufficiently provide for the operational and functional needs for electricity networks to be located in particular environments?	Yes, it includes direction for all environments including areas with covered by s6, urban and rural environments, the coastal environment and jurisdictional boundaries.
Do you support Transpower and electricity distribution businesses selecting the preferred route or sites for development of electricity networks?	Agree that it is the role of Transpower and electricity distribution businesses to determine the purpose, scope, capacity and technical solution for a proposed EN activity and ultimately the site, route and methods for EN activities and assets. A caveat to this is site, route and area selection should avoid as much as practicable adverse effects on the environment particularly in relation to s6 matters.
Are there any other route or site selection considerations that have not been identified?	Whether alternative sites, routes or methods have been considered or are acceptable to Transpower and/or electricity distribution businesses.
Does the proposed policy adequately provide for the consideration of Māori interests in electricity networks?	The proposed policy is considered to adequately provide for the consideration of Māori interests in electricity networks.
Do you support the proposed policy to enable development of electricity networks in areas not protected by section 6 of the RMA, or covered by other national direction?	Council holds concerns that other activities not captured by the proposed policy may not be compatible with electricity networks.
Do the proposals cover all the matters that decision-makers should evaluate when considering and managing the effects of electricity network activities?	No, it does not explicitly cover the interaction with section 6 matters.
Do you support the proposed policy to enable routine works on existing electricity network infrastructure in any location or environment?	Generally, agree that routine EN activities should be enabled in all locations given the assets are existing. However, the definition of routine works is broad and could allow for upgrades that are not 'like for like' or within

	<p>general scope of the existing infrastructure/assets such as height and coverage increases. The definition could be refined to limit works to the existing footprint or allow for increases within a certain percentage.</p>
<p>What other practical refinements to Policy 8 of the NPS-EN could help avoid adverse effects on outstanding natural landscapes, areas of high natural character, and areas of high recreation value and amenity in rural environments?</p>	<p>Policy 8 of the NPS-EN could be include a new definition of sensitive environment that includes the areas listed in the policy as well as any other environments (if appropriate). It is also unclear what would constitute as high recreational value and/or amenity. Would it be more beneficial to refer to Visual Amenity Landscapes?</p>
<p>Do you support the proposed policy to enable sufficient on-site space for distribution assets?</p>	<p>On-site space is not defined nor development. It is therefore unclear when this policy direction would apply. Does it apply to all new Development Areas, large scale subdivisions and land use development, noting that all development will 'increase demand for electricity'. The policy as drafted also does not recognise that the 'demand' for electricity may change over time.</p>
<p>Should developers be required to consult with electricity distribution providers before a resource consent for land development is granted? If not, what type or scale of works would merit such consultation?</p>	<p>It is common practice for developers to consult with electricity distribution providers before a subdivision consent is granted. The same approach could be applied to land use activities (where resource consent for the activity is required) especially in instances where the density of development is increasing and council has sufficient scope/discretion to impose conditions to manage potential adverse effects.</p>

National Environmental Standard for Electricity Transmission Activities	
Question	Response
<p>What activity status is appropriate for electricity transmission network activities when these:</p>	<p>Restricted Discretionary.</p>

<p>a. do not comply with permitted activity standards?</p> <p>b. are located within a natural area or a historic heritage place or area?</p>	
Do you support the proposed scope of activities and changes to the permitted activity conditions for electricity transmission network activities?	Yes, these seem reasonable and will mean reduced consenting processes.
Do you support the proposed matters of control and discretion for all relevant matters to be considered and managed through consent conditions?	Yes, these seem appropriate.
Would the proposed National Grid Yard and Subdivision Corridor rules be effective in restricting inappropriate development and subdivision underneath electricity lines?	Yes, Council supports a nationwide approach.
Do you support adding any or all of the five categories of regional activities to the NES-ENA as permitted activities?	Council has no view on this matter.
Do you support the proposed permitted activity conditions and the activity classes if these conditions are not met?	Yes.
Do you support management plans being used to manage environmental impacts from blasting, vegetation management and earthworks?	Yes, where appropriate standardisation is applied.
What is an appropriate activity status for electricity distribution activities when the permitted activity conditions are not met, and should this be different for existing versus new assets?	Controlled for existing restricted discretionary for new
What is your feedback on the scope and scale of the electricity distribution activities to be covered by the proposed NES-ENA?	Generally, support.
Do you support the proposed inclusion of safe distance requirements and compliance with some or all of the New Zealand Electrical Code of Practice for Electrical Safe Distances 34:2001?	Yes, this would be a beneficial approach.

Is the proposed NES-ENA the best vehicle to drive compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distance 34:2001? If not, what other mechanisms would be better?	Yes, it is as it would reduce the need for councils to address in district plans.
Should the NES-ENA allow plan rules to be more lenient for electricity distribution activities proposed to be regulated?	Yes, removal of regulation for critical infrastructure is supported.
Should the NES-ENA allow plan rules to be more stringent in relation to electricity distribution activities in specific environments? (eg, when located in a 'natural area').	It would be more appropriate that the documentation provided national level direction rather than each Council seeking to litigate what is appropriate. A scale threshold could be applied.

Public EV Charging Infrastructure	
Question	Response
Do you support the proposed provisions to make private electric vehicle charging and associated infrastructure a permitted activity at home or at work?	The Proposed Timaru District Plan permits the installation of new and replacement charging facilities for electric vehicles where they are adjacent to an existing, permitted or consented vehicle parking space. The Council therefore have no concerns with private electric vehicle charging and associated infrastructure being permitted at home or at work.
Have private or at work electric vehicle users been required to obtain a resource consent for the installation, maintenance and use of electric vehicle charging infrastructure?	No.
Should the construction, operation and maintenance of electric vehicle charging infrastructure be a permitted activity, if it is located in a land transport corridor?	Yes, the proposed Timaru District Plan permits EV charging within a land transport corridor if it is immediately adjacent to an existing, permitted or consented vehicle parking space.
Should the construction, operation and maintenance of electric vehicle charging infrastructure become a permitted activity, if it is ancillary to the primary activity or outside residential areas?	Yes.

Do you support the proposed provisions for electric vehicle charging for all types of EVs, or are additional requirements needed for heavy vehicles such as large trucks, ferries or aircraft?	Yes. The proposed Timaru District Plan does not distinguish between EVs.
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National Environment Standards for Telecommunication Facilities	
Question	Response
Do the proposed provisions sufficiently enable the roll-out or upgrade of telecommunication facilities to meet the connectivity needs of New Zealanders?	Timaru District Council has no specific comments in relation to this matter.
Which option for proposed amendments to permitted activity standards for telecommunication facilities do you support?	Option 1. Specifying the maximum pole height by zone provides added certainty. 1.6m headframes are less visually dominant. Agree the height limit rules for antennas on buildings should be measured from the highest point of the building (not from the point the antenna is attached to the building) and generally support the increase to 10m (from 5m) not in a residential zone.
Do the proposed provisions appropriately manage any adverse effects (such as environmental, visual or cultural effects)?	They provide a consistent approach which is supported.
Do the proposed provisions place adequate limits on the size of telecommunication facilities in different zones?	Council has not formed a view on these as different locations throughout the country may be impacted in different ways.
Should a more permissive approach be taken to enabling telecommunication facilities to be inside rather than outside the road reserve?	The ability of corridor managers to effectively manage these spaces needs to be maintained.
Do you support the installation and operation of fewer larger telecommunication facilities to support co-location of multiple facility operators?	Yes, where there is appropriate space.

National Environment Standards for Granny Flats (Minor Residential Units)	
Question	Response

Are the proposed provisions in the NES-GF the best way to make it easier to build granny flats (minor residential units) in the resource management system?	Yes, the proposed NESGF will ensure a consistent approach is being applied throughout NZ.
Do you support the proposed permitted activity standards for minor residential units?	<p>Generally, support the permitted activity standards.</p> <p>Concerns PAS 1 only applies to internal floor area of minor units. It is unclear whether these captures covered patios/outdoor living spaces or attached garages/carports.</p> <p>The NES-GF does not include controls on height, nor the gross floor area of minor units – would the NESGF allow for two storey minor units?</p>
Do you support district plans being able to have more lenient standards for minor residential units?	Yes, there may be instances where a greater density of development is acceptable such as higher density zones. The Proposed Timaru District Plan for example permits three residential units in the Medium Density Residential Zone.
Should the proposed NES-GF align, where appropriate, with the complementary building consent exemption proposal?	Yes, from an efficiency and customer expectation perspective it would be desirable for the proposed NES-GF to align with the Building Act 2004.
Do you support the proposed list of matters that local authorities may not regulate in relation to minor residential units? Should any additional matters be included	Concerns with excluding glazing, privacy or sunlight access. The residential zones in the Proposed Timaru District Plan for example both seek to ensure residential activities achieve good levels of sunlight and privacy. Glazing may also be essential to mitigate adverse effects especially in proximity to noise generating activities.
Do you support existing district plan rules applying when one or more of the proposed permitted activity standards are not met?	Yes, where a minor unit does not comply with the NES-GF it is appropriate for the relevant district plan rules to apply.
Do you support the list of matters that are out of scope of the proposed NES-GF?	Yes, the list of matters out of scope of the proposed NES-GF are appropriate.

Should any additional matters be included?	
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National Environment Standards for Papakāinga	
Question	Response
Do you support the proposal to permit papakāinga (subject to various conditions) on the types of land described above?	Generally, support the proposal to permit papakāinga on land where the owners have an ancestral connection to the land and where the land has remained in the ownership of the original owners and their decedents.
What additional non-residential activities to support papakāinga should be enabled through the NES-P?	Other non-residential activities could include primary production (in rural zones) and home business.
What additional permitted activity standards for papakāinga should be included?	No other permitted activity standards are considered necessary.
Which, if any, rules from the underlying zone should apply to papakāinga developments?	It is noted that not all of the rules identified are necessarily contained in the underlying zone chapter and may be located in the district-wide chapters, such as natural hazards, setbacks from waterways and rail corridors, noise and the provision of infrastructure. Other rules that could be appropriate to be included, include height in relation to boundary requirements and rules managing other section 6 matters such as heritage.
Should local authorities have restricted discretion over papakāinga on Treaty settlement land (ie, should local authorities only be able to make decisions based on the matters specified in the proposed rule)?	<p>Support a restricted discretionary activity status where PAS1 (Maximum building coverage) and PAS2 (Setbacks) are breached.</p> <p>Concerns that a restricted discretionary activity status where the activity standards are being breached is not sufficient. The matters of discretion as drafted are specific to the building coverage and setback breach and do not sufficiently address scenarios where the activity standards are being breached.</p>

	Allowing up to 30 residential units could have adverse effects that require broader discretion/consideration than the matters of discretion specified.
What alternative approaches might help ensure that rules to enable papakāinga on general land are not misused (for private/commercial use or sale)?	Imposing a discretionary activity status for papakāinga that does not comply with the permitted activity standards. Limiting the use and establishment of non-ancillary residential activities to residents.
Should the NES-P specify that the land containing papakāinga on general land cannot be subdivided in future?	Yes, unless the sites/activities comply with the underlying zone rule requirements such as minimum allotment size, servicing etc.

National Policy Statement for Natural Hazards	
Question	Response
Should the proposed NPS-NH apply to the seven hazards identified and allow local authorities to manage other natural hazard risks?	Generally, support the seven hazards identified and the ability for local authorities to manage other natural hazard risks at a local level.
Should the NPS-NH apply to all new subdivision, land use and development, and not to infrastructure and primary production?	<p>Agree that the NPS-NH should apply to all new subdivision, land use and development.</p> <p>Concern that by excluding infrastructure and primary production activities as well as any activities ancillary to these activities this could have unintended consequences especially as the definition of infrastructure is expanding to include social infrastructure.</p>
Would the proposed NPS-NH improve natural hazard risk management in New Zealand?	The NPSNH could improve natural hazard risk management in NZ by setting best practice and by requiring a risk-based approach to natural hazard risk.
Do you support the proposed policy to direct minimum components that a risk assessment must consider but allow local authorities to take a more comprehensive risk assessment process if they so wish?	Yes, this provides local authorities with sufficient flexibility.

How would the proposed provisions impact decision-making?	Directs decisions to be based on overall natural hazard risk. The proposed approach is currently applied by Timaru District Council and is unlikely to result in significant changes to existing practice.
Do you support the placement of very high, high, medium and low on the matrix?	Generally, support the placement of very high, high, medium and low on the matrix.
Do you support the definition of significant risk from natural hazards being defined as very high, high, medium risk, as depicted in the matrix?	Have some reservations including medium risk as a significant risk. Based on the matrix this would include risks where the consequence is minor and may be able to be mitigated such as finished floor levels in a flood risk area. In general, a significant risk implies the risk is unacceptable (i.e., the risk should ultimately be avoided). To allow a cascade approach in policy direction and decision making, it would be beneficial for medium risk to be removed from the definition of significant risk.
Should the risks of natural hazards to new subdivision, land use and development be managed proportionately to the level of natural hazard risk?	Generally, agree that stronger constraints on development are appropriate where risks are higher.
How will the proposed proportionate management approach make a difference in terms of existing practice?	The proposed approach is currently applied by Timaru District Council and is unlikely to result in significant changes to existing practice.
Should the proposed NPS-NH direct local authorities to use the best available information in planning and resource consent decision-making?	Yes, a nationalised standard on how to evaluate this would be beneficial.
What challenges, if any, would this approach generate?	The biggest challenge will be assessing and making determinations when there is conflicting evidence.
What additional support or guidance is needed to implement the proposed NPS-NH	National guidelines on best practice would be beneficial.
Should the NZCPS prevail over the proposed NPS-NH?	From an efficiency perspective it would be beneficial for the NPS-NH to apply to all environments including the Coastal

	Marine Area. However, provided it is made clear that the NZCPS prevails over the NPS-NH Timaru District Council has no concerns with this approach.
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Implementation of Infrastructure and Development Instruments	
Question	Response
Does 'as soon as practicable' provide enough flexibility for implementing this suite of new national policy statements and amendments?	In general as soon as practicable provides sufficient flexibility. However, added certainty would be preferred.
Is providing a maximum time period for plan changes to fully implement national policy statements to be notified sufficient? a. If not, what would be better, and why? b. If yes, what time period would be reasonable (eg, five years), and why?	A minimum time period for plan changes to fully implement national policy statements would provide greater certainty to Councils. This should be linked to the introduction of the new system.
Is it reasonable to require all plan changes to fully implement a national policy statement before or at plan review?	Yes, as part of any substantive plan changes to a district plan it would be appropriate to fully implement any new national policy statements. However, requiring all plan changes regardless of scale to fully implement any new policy statement could result in increased costs and processes especially if the plan change is narrow.
Are there other statutory or non-statutory implementation provisions that should be considered?	Funding to support Council's in implementing new requirements and commissioning necessary reports would be welcomed.