
Further assessment in support of the cost-effective criterion under section 22(1)(b)(i) – 21.05.26

In taking into account the Fast-track Approvals Act 2024 fee structure and comparing this against the likely costs and process implications of proceeding under standard RMA pathways. Based on the current information available, while the Fast-track process involves significantly higher upfront statutory fees and levies, there are strong grounds to consider that the process may nevertheless represent the most cost-effective overall consenting pathway for this proposal when assessed in the context of total project delivery costs, timeframes, procedural duplication, and appeal risk.

The Fast-track process enables the project to proceed through a single integrated approval pathway, rather than requiring multiple sequential approvals under the Resource Management Act 1991. Under a standard RMA approach, the proposal would likely require:

- a private plan change process to establish an appropriate planning framework;
- subsequent subdivision consent applications;
- regional consents associated with earthworks, contaminated land, stormwater discharge, and water take consents;
- potentially additional approvals relating to contaminated land or infrastructure works.

Each of these processes would involve separate applications, reporting requirements, consultant inputs, and while the plan change would involve a hearing and raise the potential for an appeal. While private plan changes may initially appear less expensive from a statutory fee perspective, they involve greater procedural complexity, more extensive public participation, and materially higher appeal exposure.

The Fast-track fee structure published by the Ministry for the Environment identifies the following indicative costs:

- Referral application fee: \$12,000 plus a \$6,700 levy;
- Substantive application fee: \$250,000 plus a \$140,000 levy;
- all costs excluding GST.

While these costs are substantial, they operate on a cost-recovery basis and consolidate into one coordinated approval process which would otherwise likely be several separate consenting processes under the RMA.

By comparison, an assessment of Plan Changes notes:

- average council costs for private plan changes nationally are approximately \$130,000, although with significant variability (limited local data available due to infrequency);
- there remains considerable uncertainty regarding actual hearing, expert witness, and appeal costs;
- additional subdivision and regional consent processes would still be required following the rezoning of the site;
- appeals to the Environment Court are materially more likely under a standard public plan change process which would further add cost.

Importantly, the Fast-track process substantially reduces the risk of extended litigation and duplicated process costs. The legislation limits appeal rights primarily to points of law, whereas a private plan change may be subject to full merits appeals to the Environment Court. For a proposal of this complexity, appeal processes could add several hundred thousand dollars in additional planning, legal, technical, and holding costs, as well as significant delays to project commencement.

There are also broader economic efficiency considerations relevant to section 22(1)(b)(i). Delays associated with sequential RMA approvals can materially increase:

- financing and holding costs;
- infrastructure delivery costs;
- consultant and legal costs;
- uncertainty for investment decisions;
- risks associated with changing policy frameworks over time.

A private plan change pathway could reasonably add an additional 6–12 months beyond the rezoning process itself before subdivision and implementation consents are secured, whereas the Fast-track process allows these matters to be addressed comprehensively within a single approval framework.

Accordingly, although the Fast-track pathway involves higher initial application fees and levies, it is considered likely to provide a more cost-effective overall consenting process for this project when assessed holistically, particularly having regard to:

- reduced duplication across consenting processes;

- faster and more certain decision-making timeframes;
- reduced exposure to prolonged appeals;
- integrated consideration of district and regional consenting matters;
- reduced project delay and associated carrying costs;
- greater overall certainty for infrastructure and development sequencing.

These efficiencies are particularly relevant given the scale of technical work already completed for the proposal, including infrastructure, transport, geotechnical, landscape, economic, freshwater, and planning assessments, as identified in the submitted documents.

For these reasons, it is considered the proposal is capable of satisfying the “cost-effective” aspect of section 22(1)(b)(i) notwithstanding the higher upfront Fast-track application fees.