



19 April 2024

Environment Committee  
By email

Dear Members of the Committee,

### **LGNZ's submission on the Fast-track Approvals Bill**

Local Government New Zealand's joint submission with Taituarā — Local Government Professionals Aotearoa sets out our detailed views on this bill. This letter complements the joint submission and summarises key matters for LGNZ's members.

### **LGNZ acknowledges the need for a fast-track tool in the current system, and seeks improvements**

Local government and communities stand to benefit from faster and more efficient decision making, and the delivery of nationally and regionally significant projects that this process would provide. LGNZ sees this fast-track process as a stop gap until a new more efficient and faster resource management system is developed. A new system should either incorporate a streamlined infrastructure planning process or make the need for this redundant. Local government is keen to support development of a more efficient new system. Given the role local government plays in delivering central government's resource management system it has key insights into how these improvements could be made.

Given the finite nature of this fast-track process, we would like to see the legislation contain a sunset clause timed with when a new system is likely to be in place.

As it currently stands, almost any project could apply for approval under this legislation. To eliminate potential for this, we would like the bill to be more focused. We think the bill would benefit from clearer definitions of regional and national significance, and a primary focus on infrastructure.

We would also like to see requirements for greater transparency built into the process. Transparency will be essential for building and maintaining social licence for significant decisions that bypass usual approvals processes, including public consultation.

### **The Fast-track Approvals Bill needs to better align with local government planning instruments and processes**

LGNZ wants to see greater weight placed in the legislation on local government planning instruments and processes. They should be given greater consideration in all stages of the fast-track process. We do not believe that this would undermine the intent of this legislation. This would ensure that approved projects are supported by other infrastructure and investment, and do not undermine local outcomes. This will also help avoid natural hazards.

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Greater alignment with local government planning instruments and processes is particularly important if housing projects are going to be subject to the approvals process, given the reliance of these developments on infrastructure provision. We are also concerned about the potential unintended consequences if prohibited activities gain approval, particularly where this relates to natural hazards.

**Approved projects would benefit significantly if local government was better supported to engage in the process**

Local government is a critical infrastructure planner and provider, and has an essential role in supporting a healthy natural environment and well-functioning urban areas. Councils have valuable experience and information to contribute to the approvals process, and will play key roles in relation to consenting, compliance, monitoring and enforcement. Councils will also provide community voice and perspective into these processes.

The specified timeframes for local government input are too short. As well as putting pressure on councils to quickly provide complex input, the short timeframes may also add to the length or complexity of later stages.

To support councils to ensure that this process is as fast and efficient as possible, councils should be able to recover reasonable costs for their contributions in the pre-referral stages, including engagement with the applicant. There also needs to be increased resourcing for the relevant compliance, monitoring and enforcement roles of councils for any successful approvals. This will help to ensure that projects deliver their intended outcomes.

**There should be greater support for sustainable development as the foundation for long-term economic outcomes**

A number of our members want to see sustainable development as an explicit goal of this legislation, as was the case for the COVID-19 Recovery (Fast-track Consenting) Act 2020, because this will align decisions with the current RMA and promote long-term net benefits. To ensure efficiency and consistency, a number of our members support the Minister for the Environment being one of the joint ministers given their role in the broader resource management system.

Ngā mihi nui,

A handwritten signature in black ink, appearing to be 'S Broughton', written over a light blue horizontal line.

Sam Broughton  
President  
Local Government New Zealand