

Civil Contractors New Zealand submission on fast track consenting

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Introduction

Thank you for the opportunity to submit on the process for fast track RMA consenting for infrastructure projects of national, regional and local significance.

Civil Contractors New Zealand (CCNZ) is an industry association representing the interests and aspirations of more than 800 member businesses and organisations, including more than 520 large, medium-sized, and small businesses in civil engineering, construction, and general contracting.

Our 300 associate members provide valuable products, support, and services to contractor members. We live and work in all communities across New Zealand.

Civil contractors are responsible for the physical construction and maintenance of NZ's transport networks, water networks that bring fresh water to houses and wastewater to treatment plants, cables that bring the internet to homes and businesses, ports, airports and private developments.

These are the services a modern and developed economy must have to compete efficiently in world markets and to deliver high living standards and wellbeing for all New Zealanders. Because of the breadth of work environments, civil contractors have an extensive understanding of how the environment is protected in practical terms. They work to construct wetlands as part of projects, as well as maintaining riverbanks, parks and great walks.

In short, resource management is relevant to civil contractors because the construction and maintenance of infrastructure and buildings is a use of land and the environment.

CCNZ acknowledges the widely held view that the Resource Management Act 1991 (RMA) system as it stands is broken. It is litigious, expensive, and time consuming, for both resource consenting and planning.

It has created significant cost, both for those seeking consent for development and those seeking environmental protection, because it lacks effective mechanisms for conflict resolution, often leading to a costly stalemate where development is sought.

CCNZ acknowledges the Government's resource management reform (RM reform) objectives, and seeks the following from RM reform:

- Consenting pathways that enable the construction, operation and maintenance of infrastructure and the built environment, for both large and small projects
- Efficient and effective and affordable consenting, planning and other regulatory processes, also to avoid unnecessary delays in regulatory processes
- The above to apply to civil construction at all scales, from small earthworks to multi-firm construction alliances for nationally significant projects
- Ability to manage trade-offs or conflicts between RM reform objectives, eg between protection of, and the use and development of the natural and built environment
- Effective mechanisms to balance the environmental cost of development against the benefits infrastructure delivers for our society
- Access to raw materials that enable infrastructure construction, such as aggregate, steel and concrete, and efficient repurposing of construction and demolition waste, whether through recycling or through identified sites for enabling infrastructure - eg cleanfills
- Upholding of property rights, including for existing infrastructure and buildings

CCNZ welcomes the opportunity to submit further on the fast-track consenting process.

Background on previous submissions

CCNZ [made submissions on the previous government's NBE and SP Bills](#), primarily around:

- Consenting pathways for significant infrastructure and construction, which improve on the RMA
- Strategic spatial planning, followed by detailed planning at regional scale, with early input from infrastructure providers
- The promise of effective national direction and conflict resolution for infrastructure among RM reform outcomes via a national planning framework (still in development)

Key comments on fast tracking of infrastructure projects under the RMA

- CCNZ supports fast track consenting for infrastructure projects. It is currently too common and too costly for projects to be held up by endless and costly debate without satisfactory outcomes for any of the parties involved.

- CCNZ notes there is precedent for fast tracking of projects in the manner suggested by the Government.
- It is important fast-track consenting can be applied to a range of project scales. Because of this, we consider the 'national, regional and locally significant' approach to be appropriate (although how this is applied will need consideration).
- If fast tracked consenting is to become normalised, it is important there is capacity to conduct this at the appropriate scale.
- Poor outcomes happen when day to day infrastructure construction is passed over in favour of megaprojects / glamour projects. It is important that any fast track consenting process does not detract from ability to deliver ongoing programmes of infrastructure construction and maintenance.
- Fast track consenting should also consider enabling infrastructure such as quarries and cleanfill sites, to ensure projects can be conducted with reduced waste and maximum efficiency. Infrastructure projects should not be considered as separate from the regions in which they are taking place.
- It is important that environmental impacts can be balanced, and remedial actions proposed as part of consent conditions.
- There are several other processes involved in infrastructure project delivery (for instance land designations, access arrangements, Department of Conservation concessions, and more. These should be considered in an integrated approach if the process is truly to be streamlined.
- It is important this process is as de-politicised in its application as it can be. Because of this, it seems appropriate for an independent entity to handle the allocation of projects, lest projects become victim to political point-scoring.

Yours sincerely,



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