

**Submissions on Proposed Fees & Charges
for Planning & Miscellaneous Services**

Subm No	Submitter
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2	Brian Green Residential Developments Ltd – Kevin Judd

Planning & Miscellaneous Service Fees

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From: Les Fugle <> Saturday, 22 March
Sent: 2025 9:13 pm Submission
To: Submission
Subject:

Submission - Planning and Miscellaneous Service Fee

1. I strongly oppose the introduction of Council's propose increases in fees, as well as the current charges. These charges are exorbitant, unjustified, and detrimental to the business sector.
2. Fees should not be disproportionate to officer remuneration, acknowledging adjustment for administrative margin. For example, charging \$285 per hour for a planning officer and claiming this represents 88% of the actual cost implies cost to manage that service is \$325 per hour. This equates to Council receiving from that person annual workload generating around \$600,000, based on a 40-hour/46 week year, which is indefensible when measured against a person's salary.
3. The relevant provision to set charges is regulated and emphasised by section 150 of the Local Government Act 2002. The core principle encircles Council must not recover more than the reasonable costs incurred encircling that on hand.
4. Reasonable is one of fairness and fact. My submission Council charges exceed the actual cost of the service(s) albeit unable to quantify degree without further information from Council.
5. It is illogical and unacceptable that Council processing fees often exceed the cost incurred by applicants and consultants in preparing comprehensive applications. The Council's role is primarily one of peer review of the application, which should not necessitate such inflated fees. The Council's substantial expenditure on external consultants and legal counsel further underscores staff ability to manage matter.
6. The Council's methodology of bundling operating and outsourcing costs to justify an 88% recovery target is flawed. These inflated fees are a significant deterrent to development and employment. A dramatic reduction in charges would stimulate growth, thereby increasing the Council's rate intake.

I wish to make an oral submission to further articulate my concerns.

Request for Information:

To further analyse the Council's fee structure; pursuant to the Local Government Official Information and Meetings Act 1987 (LGOIMA) please provide the following information:

- * Detailed supporting documentation that used to calculate each proposed fee increase charge under the category "Indicative Charges" for planning matters.
- * Actual revenue received for each sub-category listed in above schedule of charges.
- * The amounts paid to external consultants, separately, that to outsourced legal services.
- * All the above information for the 12 months preceding the proposed fee increases.

Please do not hesitate to contact me should additional information required.
Les Fugle.

218212

17 April 2025

BRIAN GREEN RESIDENTIAL DEVELOPMENTS LTD - SUBMISSION

Thanks for the opportunity to provide a submission to the draft annual plan budget 2025/2026.

This submission is made on behalf of Brian Green Residential Developments Limited (BGRDL) and relates to the proposed Fees and Charges for Planning and Miscellaneous Services.

Firstly, we see that Council are endeavoring to recover 100% of their costs to provide planning services. We accept that they can recover a “high” percentage however we believe that 100% recovery is too high. Section 150 of the LG Act 2002 requires that the fees must only recover reasonable costs.

When a subdivision consent is not processed within the timeframes specified by the RMA a discount on fees is required to be issued. If this is applied, does Council wear this cost or are the new fees, being proposed, elevated to cover this? If the fees are being elevated to cover that cost, what penalty is Council paying for not meeting the RMA timeframes?

We would be interested to see what percentage other Councils charge. This point is not covered by Councils report. It is our understanding that other Councils have a recovery rate less than 100%, due to a public good component. We would prefer that Council set their recovery at 80%.

Secondly, we see that “Technical and Professional Staff from all other Council units” are to be charged out at \$245/hour. While this is a reduction from last year’s \$268/hour we would like this line item split into Senior, Intermediate and Junior costs so that the fee reflects the seniority of the Council staff member involved. Last year we had a situation where a Junior PNCC staff member was being charged out at \$268/hour while our company’s most experienced and fully qualified Chartered engineer was being charged out at a rate significantly less than that.

KB Judd
Resonant Consulting Ltd

