

6 December 2017

Rochelle Ade
Director
chelleade@yahoo.com

Dear Rochelle,

Re: Objection to Processing Costs, Section 357B Resource Management Act 1991 119 First View Avenue Beachlands. DIS60303208

I acknowledge your objection to the discharge consent application processing costs for your property, received by email on 14 November 2017. I set out below my findings having reviewed the application costs, information on the file and discussing your concerns with the reporting planners. You confirmed that you had been provided a copy the officer's time sheet. I have also seen the preliminary response from Andrew Benson Team Leader Coastal and Water Allocation.

As mentioned in our phone discussion, the application processing time charged to your discharge consent does not reflect the true time taken by council staff. You have referred to your project as ground breaking and I agree in the sense that you sought an approval for a matter that had not been encountered previously. It has been the uniqueness of the consent being pursued on a small site that created the concerns for both in-house staff and our discharge consultant specialist.

I have analysed the timesheet entries and mapped these back to the times and extent of written correspondence and reporting. This shows that there is planning officer time that has not been charged and at best the invoice reflects a bare minimum of council's true cost. Additionally there is lengthy correspondence by council officers in regards to technical and interpretative questions resulting directly from the uniqueness of your application and none of these officers charged their time.

Primarily for these reason I find little in either the case management or reporting that could be considered to be unreasonable, over reported or an inefficient use of time. Certainly all of this time charged was occasioned directly by the lodgement of your consent. That is the main statutory test under the Resource Management Act (the 'Act') for a cost objection in the consideration of what is reasonable.

The \$156.00 hourly rate that you have queried relates to the professional planners' time in assessment, case management with specialists, review and reporting on your

application. This time is not administrative. The specific hourly rate is otherwise not open to objection review having been set by a public process as part of the annual plan.

The out-sourcing your application to a discharge specialist should not have increased the cost of processing. The council has not on-charged for any consultant overview. Council does not staff for its maximum processing or for all specialist needs, as the number and types of applications varies widely from year to year. It is more cost effective for applicants where the council staff levels acknowledge the need for consultants to process the overflow. Mr Benson has already covered why it was logical that your application in particular was out sourced and the benefits for both yourself and council in doing so.

I appreciate the personal nature of your project. The consents department cannot however distinguish with its processing charges between houses built for personal need and those built for profit. I am unable to advise, as to whether there are other possible funding avenues available for you in establishing your sustainable home.

Due to the above, I am not in a position to offer any reduction to the invoice charge. I must therefore inform that you may have your objection heard and determined by an independent commissioner as provided for under section 357C (4) of the Act. Can you please response to me by Friday 18th December 2017 if that is your preference and I will proceed to arrange a time for the matter to be heard.

Otherwise, if that is not your intention, please respectfully take this letter as a formal decision to dismiss the objection under staff delegation pursuant to section 357D of the Act. I will proceed to close the file prior to the end of the year.

I kindly await your response.

Best regards



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Southern Resource Consenting - Auckland Council

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