

In the matter of the Resource Management Act 1991

and

In the matter of the Te Tai o Poutini Plan

and

In the matter of submissions by the House Movers Section of the New Zealand Heavy Haulage Association Inc for the Industrial and Commercial Zones hearing

**Statement of Evidence of Jonathan Bhana-Thomson (CEO, House Movers
Section of New Zealand Heavy Haulage Association Inc)**

For: Industrial and commercial zones hearing

Hearing date: 1 – 3 July 2024

NEW ZEALAND HEAVY HAULAGE ASSOCIATION INC

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I, Jonathan Bhana-Thomson, state:

1. Introduction

- 1.1 I am the Chief Executive of the New Zealand Heavy Haulage Association Inc (the Association) and have been in this role 21 for years.
- 1.2 I am very familiar with the process of relocating buildings and have made submissions in the past at various district plan hearings. I am authorised to give this evidence on the Association's behalf.
- 1.3 The New Zealand Heavy Haulage Association was established in 1965 as the national trade association for member companies that transport overweight or over dimension loads.
- 1.4 The Association has an advocacy role with central and local government agencies.
- 1.5 There are 35 members of the House Movers Section of the Association. By numbers the Association estimates that its members move about 80% of the buildings relocated in any one year nationally. With a couple of exceptions, most of the Association's House Mover members are family-owned businesses. Most have been involved in the industry for many decades. Members are also involved construction and fabrication of (new) transportable or prefabricated buildings as well as 'second hand' used buildings. This includes shifting of classrooms and similar for government agencies as well as buildings for the private sector.

2. Staff Report

- 2.1 I have read the s42A staff reports for the industrial and commercial zones. I disagree with the recommendations of the staff report rejecting the Association's submissions.
- 2.2 The only rules in the TTPP that could be related to the Building Act is that the building is installed onto new foundations in line with a Building consent. There is no requirement in the Building Act to complete this within a reasonable timeframe (we have recommended 2 months). In addition, this schedule reduces the risk of health and safety issues of buildings being left on temporary supports. Further, there are no requirements in Act for timely

completion of other reinstatement works that may not covered by a building consent – such as installing baseboards, and rectifying any damage to the building, for example spouting’s that may have been damaged during transit. Therefore we seek that these reinstatement works are completed within an acceptable time (which we have proposed a 12 month period). In our experience with other areas around the country, this is a way to manage the amenity effects of a relocated building coming into an area, and not being established onto the site.

- 2.3 Without dedicated rules relating to relocated buildings, it is not certain that relocated buildings are provided for as a permitted activity. The default rules may apply to relocated building activities, which renders the activity non-complying. For example, COMZ-R11 – *“Any activity not provided for by another Rule in the zone – Activity Status Non-complying”*, and GIZ-R15 – *“Any activity not provided for by another Rule in the zone – Activity Status Non-complying”*.
- 2.4 The definition of building in the PDP¹ (which definition is taken from the National Planning Standards) does not expressly include relocated buildings.
- 2.5 We note that the definition of relocated buildings in the PDP excludes new transportable buildings, so new industrial and commercial buildings moved onto a site in these Zones are not required to meet the performance standards.

3. Summary of Evidence

- 3.1 The Association supports:
- (a) the provision of relocated buildings as a permitted activity.
 - (b) The inclusion of separate relocated building rules as a permitted activity, with standards. (I refer to the schedule to the Association’s submissions for the standards sought in full.)

¹ Means a temporary or permanent movable or immovable physical construction that is:

- a. Partially or fully roofed, and
- b. Is fixed or located on or in land;

But excludes any motorized vehicle or other mode of transport that could be moved under its own power.

- (c) The inclusion of relocated building rules as a permitted activity in the General Industrial Zone and Light Industrial Zone, provided that relocated buildings are accessory or ancillary to an industrial use.
- (d) Council retaining a degree of control over relocated buildings through the use of performance standards.
- (e) Restricted discretionary status for relocated buildings that do not meet the permitted activity status standards.
- (f) In the event that the Commissioners do not support permitted activity status with the standards that we seek, the Association does not oppose permitted activity status (with no performance standards) as long as it is clearly identified that relocation is a permitted activity.

3.2 The Association does not support:

- (a) The deletion of relocated building rules, as recommended in the s 42A staff reports, and as submitted by Buller District Council and others.

3.3 This evidence addresses:

- (a) The sequence of relocation of buildings;
- (b) Pre-Inspection/Reinstatement report;
- (c) Controls in other districts.

4. Sequence of Relocation of Buildings

4.1 In the Industry we refer to *removal* (from a site), *relocation* (to a site) and *re-siting* (within a site). The process and sequence of relocation is largely the same whether the building is a dwelling, or a non-habitable building (as in the Industrial Zone context).

4.2 The shifting of a typical building (both its removal, and the relocation) involves a series of steps, typically in this order:

- (a) Land purchase for the destination (relocation) site.
- (b) Building purchase. The building will have either been purchased privately or from a relocation company.

- (c) Building consent obtained to relocate to the new location.
- (d) Disconnection of services from the removal site (power, phone, gas, water, drainage).
- (e) Removal of the building to its new site (or storage location) which may involve:
- (f) Possible temporary structural bracing.
- (g) Possible cutting of the building into sections, depending on the size of the building.
- (h) Possible removal or partial roof removal (which requires tarpaulins).
- (i) Loading onto the transporter.
- (j) Securing to the transporter, lighting if night travel applicable.
- (k) Road transport requirements for over dimension loads, including:
 - Uplifting of any necessary approvals from roading authorities, NZTA, Police, telecom, power companies, rail, any other utility companies.
 - Compliance with Vehicle Dimensions and Mass Land Transport Rule 2016). The rule covers the requirements for dimension and mass limits for heavy truck and trailer combinations to be operated on roads.
- (l) Placement of the building on the new site in its correct position in accordance with the building consent.
- (m) Unloading onto house/building jacks.
- (n) Installing foundations.
- (o) Placement of the building onto foundations.
- (p) Re-joining building sections, reinstatement of the roof, replacement of doors, windows, ceilings removed (as necessary).
- (q) Upgrading of ceiling or floor insulation (as necessary).
- (r) Connection of services (water, power, gas if available).

- (s) Installation of base boards, steps, decks and landings.
 - (t) Any necessary remedial works, painting and decoration etc. (some can be done prior to relocation).
 - (u) Driveway, fencing, footpath, garaging, and landscaping of the site.
 - (v) Code of compliance certificate obtained under the Building Act 2004.
- 4.3 Time issues are important to both the removal, and the relocation. To be financially viable any project has to be done in a reasonable time frame.
- 4.4 Regardless of the size of the relocation job, a house mover will aim to do the removal and the relocation in the same movement. This is so that we don't have to end up storing the building in another site, or at a storage yard, and can shift it direct from the removal site to its final destination site.
- 4.5 If the building has to be stored between its removal from one site, and its relocation to another, then there is added cost and risk. There is added risk of damage from the rain or wind, particularly if the roof has been removed. There is added cost because there will be double handling.
- 4.6 If there is a delay at the relocation site caused by the need for a resource consent, or a hold-up in obtaining neighbours approvals, then this will increase the likelihood that the building may need to be stored, and increase the price.
- 4.7 In the ideal situation, foundations can be installed in one day, and the house or building lowered onto those foundations the next day. This assumes the building has shifted in one piece and has not had to be cut into pieces due to width restrictions.
- 4.8 If the building is large, has an irregular shape, or is wider than what the transport route will allow, then it is more likely that the building will need to be cut and shifted in sections, and then joined at the relocation/destination site. The building relocation company will join the sections of the building together on site.
- 4.9 Generally, the aim will be to get the building to the section around daybreak. The roof may have been lowered and covered with tarpaulins. Ideally neighbours will have been informed that the building is coming. This initial impact can be unexpected for neighbours. It can trigger calls to Councils.

However, this is a temporary effect. Typically, within a number of days the building will have been placed on a new foundation, re-joined and the roof reinstated. Because of the risk of weather damage there is a strong incentive to have the roof reattached and the building closed in quickly. At this point the process will be a lot quicker than the average construction in situ.

- 4.10 With the building on site, and weathertight, owners generally do the finishing work themselves, although if the building needs re-roofing or a structural alteration a Licenced Building Practitioner will be involved. Owners often redecorate the inside of the building themselves and also add value and save money by fitting the base boards, steps, decks, and completing any necessary external remedial works including painting if needed. Then comes the driveway, fencing, footpaths, garaging, and landscaping of the site.
- 4.11 Even allowing for a building being moved in sections, there is an obvious potential time advantage compared to in situ construction. My experience is that relocation will generally involve far less overall construction disturbance to the neighbourhood than the typical on-site construction of a new dwelling.
- 4.12 While the initial relocation to a site is typically more machinery intensive than construction of a new dwelling, the benefit is that the project can be substantially quicker. Any remedial or refurbishment work can begin on the home straight away (or even beforehand).
- 4.13 These time benefits also apply to prefabricated or transportable new dwellings, which are becoming more common. With a transportable new dwelling work at the factory can commence ahead of the issue of building consent for the destination site and there are lower on-site labour costs.
- 4.14 The Association and its members consider that there are also community benefits with building relocation, including reuse of the existing housing stock (both within a District and outside of it) and providing for peoples housing needs.
- 4.15 A typical relocated building can weigh anywhere between 15-70 tonnes. A typical 30–40-year-old wooden construction three-bedroom family house will weigh approximately 25 tonnes. Assuming each building relocated is 25 tonne, the Association estimates building relocation is the third biggest recycling industry nationally (by weight) after metals and paper. The diversity of the materials re-cycled is large. If a building is demolished, and

landfilled, then only certain products are suitable for being recycled. In contrast, if a building is relocated nearly everything will be reused.

5. Pre-Inspection/ Reinstatement Report

- 5.1 In the Association's submission, Council can retain a degree of control over relocated buildings through the use of permitted activity standards including a pre-inspection/reinstatement report (a suggested template for which is attached to the Association's submission).
- 5.2 Some Councils have adopted (or adapted) the Association's pre-inspection report and have published their own version (for example, Hastings District, Queenstown Lakes District).
- 5.3 In the case of the Commercial and Industrial Zones the necessity for a full reinstatement report in these zones may be questioned where the buildings are functional, rather than for habitation purposes. However, in general, the Association does support the requirement of a pre-inspection report in the plan generally as it identifies specifically the items required to reinstate the building onto the site.

6. Other territorial authorities in New Zealand

- 6.1 Relocation of buildings is now typically a permitted activity in most Council areas around New Zealand. Many have specific performance controls to control reinstatement within specific time frame – while an equal number have no specific controls aside from those on a new built in-situ building.
- 6.2 Because our members shift buildings both within and between districts the Association seeks a general standardisation in approach unless there is a compelling reason to depart from this for local environmental reasons.

Dated: 14 June 2024

Jonathan Bhana-Thomson

Chief Executive, New Zealand Heavy Haulage Association