

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 Rural Zones and settlement zones hearing

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

For: Rural Zones and settlement zones Hearing

Hearing date: 29-30th July 2024

NEW ZEALAND HEAVY HAULAGE ASSOCIATION INC

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I, Jonathan Bhana-Thomson, state:

1. Introduction

- 1.1 Thank you for the opportunity to address you in relation to rural zone and settlement zone matters.
- 1.2 I am the Chief Executive of the New Zealand Heavy Haulage Association Inc (the Association) and have been in this role 21 for years.
- 1.3 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.
- 1.4 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.
- 1.5 The Association has an advocacy role with central and local government agencies.
- 1.6 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.
- 1.7 The Association has been submitting on district plans around the country for 20+ years. Initially many first-generation RMA plans had restrictions on relocated buildings. In most second and third generation plans, the trend over time has been more permissive i.e. to provide for relocated buildings as a permitted activity with standards, or in more recent plans not to differentiate between new and relocated buildings, and to leave matters to the Building Act.

2. Approach to Rural zones and settlement zones hearing

- 2.1 The Association's primary focus is on zones which permit residential activities as of right. The Association is not primarily concerned with the Settlement zone.
- 2.2 The outcome that the Association is seeking – is to treat relocated dwellings on the same or similar basis as new in situ dwellings, subject to performance standards, including the requirement for a pre-inspection report, prior to relocation, which contains the necessary requirements to upgrade the relocated dwelling within a prescribed time period (12 months)
- 2.3 The draft rule framework is specified in the Association's submission, and I attach that as a schedule to this statement.

3. Staff Report

- 3.1 I have read the s42A staff report for rural zones and generally disagree with the recommendations of the report writer. I note the following:
- (a) The Association opposes the submissions from Buller District Council (S38.502), Chris & Jan Coll (S558.021, S558.514,S558), Chris J Coll Surveying Limited (S566.021 S566.514), William McLaughlin (S567.011 S567.558), Laura Coll McLaughlin (S527.021 S574.514) which seek the deletion of relocated building rules.
 - (b) If the relocated building rules are deleted, the activity status of relocated buildings may default to non-complying under GRUZ-R35: *"Any activity not provided for by another rule in the zone – Non-complying"*. Many relocated buildings, particularly in the rural zones, will not be captured by other rules with permitted activity status, for example GRUZ-R3: Residential Activities and Residential Units if the relocated building is not a residential building/unit.
 - (c) I disagree that amenity concerns that apply to relocated buildings are associated principally with urban locations as amenity issues also apply to the General Rural Zone and should be regulated. In addition the measures that we propose seek to ensure that the reinstatement process relocated buildings in completed in a timely way.
 - (d) The s 42A staff report for residential zones supported the move to permitted activity status and rejected the deletion of relocated

building rules on the basis that it would be detrimental because amenity issues associated with relocated buildings will not otherwise be addressed. It is important that relocated buildings be treated consistently across the majority of the district.

- 3.2 I have read the s42A staff report for the settlement zones and generally agree with the recommendations of the report writer to retain the relocated building rules. However, I disagree with the recommendation at paragraph [114] not supporting the other amendments sought by the Association on the basis that these will clarify the rule and make it easier to enforce.

4. Summary of Evidence

4.1 The Association:

- (a) **Supports** the move in the Proposed Plan to permitted activity status for relocated buildings that meet appropriate performance standards and criteria.
- (b) **Supports** Council retaining a degree of control over relocated buildings – both below and over 30m² in size, through the use of performance/permitted activity standards.
- (c) **Supports** restricted discretionary status for relocated buildings which do not meet permitted activity status.
- (d) **Acknowledges** that 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.

4.2 This evidence addresses:

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

5. Sequence of Relocation of Buildings

- 5.1 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 Commercial Zone context).
- 5.2 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.

5.3 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.

5.4 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.

5.5 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.

5.6 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.

- 5.7 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.
- 5.8 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.
- 5.9 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.
- 5.10 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.
- 5.11 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.
- 5.12 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).
- 5.13 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.

- 5.14 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.
- 5.15 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.

6. Pre-Inspection/ Reinstatement Report

- 6.1 A key aspect of the Association's contention that relocated buildings can be suitably managed with permitted activity status, is 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).
- 6.2 Further to the proposed standards for permitted activity status in the PDP, the report details in advance what reinstatement and upgrade work that needs to be completed by the building owner within a 12 month timeframe. I consider that this is a key addition to gaining compliance with the outcome of a relocated building being reinstated into the new location.
- 6.3 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).

7. Other territorial authorities in New Zealand

- 7.1 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.

- 7.2 All Councils that had controlled activity status in previous District Plan, once having analysed the approach in the *Central Otago* case, and the Association's submissions, have included permitted activity status for relocated buildings within their Plans.
- 7.3 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.
- 7.4 There are other Councils that have within the last few years seen the benefits of promoting the use of relocatable buildings as a cost-effective way to provide housing and utility buildings by adopting permitted activity status for those application that meet the required standards. Areas that have moved from a more restrictive regime to allowing permitted activity status include New Plymouth and Central Hawkes Bay.
- 7.5 I encourage the Hearings Panel to consider the benefits of the Te Tai o Poutini plan adopting similar planning controls for your area.

Dated: 15 July 2024

Jonathan Bhana-Thomson

Chief Executive, New Zealand Heavy Haulage Association

SCHEDULE 1: suggested drafting by House Movers following *New Zealand Heavy Haulage Association Inc v The Central Otago District Council* (Environment Court, C45/2004)

insert permitted activity standards (or to same or similar effect):

- a. *Any relocated building intended for use as a dwelling must have previously been designed, built and used as a dwelling.*
- b. *A building pre-inspection report shall accompany the application for a building consent for the destination site. That report is to identify all reinstatement works that are to be completed to the exterior of the building.*
- c. *The building shall be located on permanent foundations approved by building consent, no later than 2 months of the building being moved to the site.*
- d. *All other reinstatement work required by the building inspection report and the building consent to reinstate the exterior of any relocated dwelling shall be completed within 12 months of the building being delivered to the site. Without limiting (c) (above) reinstatement work is to include connections to all infrastructure services and closing in and ventilation of the foundations.*
- e. *The proposed owner of the relocated building must certify to the Council that the reinstatement work will be completed within the 12-month period.*

SCHEDULE 2:

Relocated building pre-inspection report (which may either be a non-statutory form, or prescribed in the plan, or to similar effect).