

In the matter of the Resource Management Act 1991

and

In the matter of the Hutt City Council Proposed District Plan

and

In the matter of submissions by the House Movers Section of the New Zealand Heavy Haulage Association Inc for Hearing Stream 3 – Residential and Rural zones

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

For: Hearing Stream 3

Hearing date: 25 June 9:45am

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 Hearing Stream 3 matters.
- 1.2 The s 42A reports for residential and rural zones do not address relocated buildings or the Association's submission. The Association had previously also submitted to the Draft Plan in December 2023 requesting that provisions be made for relocated buildings. The Association considers it crucial that the Hutt City District Plan have clear and identifiable rules for new and recycled buildings that are relocated onto a new site in the Council area.
- 1.3 I am the Chief Executive of the New Zealand Heavy Haulage Association Inc (the Association) and have been in this role for 23 years.
- 1.4 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.
- 1.5 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.
- 1.6 The Association has an advocacy role with central and local government agencies.
- 1.7 There are 40 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.
- 1.8 The Association has been submitting on district plans around the country for more than 25 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 Hearing Stream 3 hearing

- 2.1 The Association's interest is with the treatment of relocated buildings across all zones. However, our primary focus is on the residential and rural zones.
- 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 for all zones, 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 proposed rule framework is specified in the Association's submission.
- 2.4 The residential and rural zones contain no relocated building rules and the definition of building does not include relocated buildings. Therefore, it appears the default rules may apply (e.g. MRZ-R16, GRUZ-R24) under which the activity status for relocated buildings would be discretionary.
- 2.5 If the intention is for relocated buildings to be a discretionary activity, then this should be stated clearly along with reasons.
- 2.6 If the intent is for relocated buildings to be managed using different activity rules, then the Association submits that the definitions and activity rules should be specified to give landowners in the Hutt Council area certainty about what the rules for relocation are.
- 2.7 Under the Operative District Plan, the Council intends for relocated buildings to require a resource consent under default rules. For example, under the Operative Plan Rule 4F4.1.8 in the Medium Density Residential Activity Area, relocated buildings default to non-complying activity status. This is supported by the webpage on Council's website for relocated buildings, which confirms that a resource consent is required.¹ Practice under the

¹ <https://www.huttcity.govt.nz/property-and-building/building-consents/before-you-start/types-of-work-that-need-building-consent/demolishing-or-relocating-a-house>

Operative District Plan demonstrates there is a real risk that relocated buildings will default to discretionary status under the PDP.

3. Staff Reports

3.1 I have read the s42A staff reports for the rural and residential zones. It appears those reports do not address relocated building matters or the Association's submission.

3.2 For that reason, I am making an appearance at the hearing to present the case to the Hearing Commissioners for relocated building rules to be stated in the rural and residential zones.

4. Summary of Evidence

4.1 The Association:

(a) **Supports** express provision in the Hutt City Plan for relocated buildings as a permitted activity in the Rural and Residential Zones. In addition, the Association supports performance standards and criteria sought in its submission for all zones (except where a specified heritage or conservation or urban design consideration applies), and also with the exception that a relocated building condition report is not required for industrial zones;

(b) **Supports** the insertion of the following definition of "relocated building": "*means the relocation of an existing building to another site, but excludes the movement of a building within the same title or buildings that are new and have not been used.*".

(c) **Supports** referencing the current definition of "relocation" in the Proposed Plan to historic heritage buildings only.

(d) **Supports** Council retaining a degree of control over relocated buildings through the use of performance/permitted activity standards where relevant.

(e) **Supports** inserting restricted discretionary activity status for relocated buildings that do not meet the permitted activity status standards.

4.2 This evidence addresses:

- (a) The sequence of relocation of buildings;
- (b) The case for encouraging building relocation in Hutt City
- (c) Pre-Inspection/Reinstatement report;
- (d) 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 Industrial 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:

- (i) Uplifting of any necessary approvals from roading authorities, NZTA, Police, Chorus, power companies, rail, any other utility companies.
 - (ii) 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.
- 5.16 **The case for encouraging building relocation in Hutt City**
- 5.17 The operative Plan is silent on the management of relocated buildings into and within the Hutt City area – therefore they appear to be a non-complying activity. However, information on the Council website does indicates a pathway for relocated buildings by stating that a resource consent alongside a building consent may be required.
- 5.18 Relocated buildings – both new and recycled – can make a positive contribution to affordable housing in the Hutt Council area, and the Association wishes to promote this housing option by the specific inclusion of Permitted activity provisions in the Proposed Plan – as long as they meet certain performance requirements. This means that existing houses that are within the Hutt City that are on a site to be redeveloped, can be relocated to another site within the city – instead of being demolished and taken to landfill. However, the current Plan makes this far more difficult to do so than it needs to be.

- 5.19 We submit that for both new and recycled relocatable buildings, these would need to comply with the normal building requirements, for example building coverage, height, boundary setbacks, and alike – for which a building consent would be required.
- 5.20 Relocatable buildings should be specifically detailed in the Proposed Plan to have permitted activity status to encourage relocatable building options. This can be achieved for new relocatable buildings by adopting the “relocatable building” definition in this submission. For recycled second-hand buildings, the Association submits they will also need to comply with various performance requirements attached to a specific permitted activity status. If the consent application for a recycled building is not able to comply with the performance requirements, then the Proposed Plan should specifically include a default restricted discretionary status that includes a resource consent.
- 5.21 The performance requirements for recycled buildings that the Association recommends have already been documented to the Council in the Association’s submission. These include:
- (a) A standardised approach to the report for the building inspection that details the range of areas to be upgraded on the building and the gaining of estimates of the costs involved in undertaking these upgrades;
 - (b) A timeframe for completion that has the building on permanent foundations within two months, and then a realistic total time-frame of 12 months from arrival on-site to complete the works on the building, allowing for weather issues and availability of tradespeople;
 - (c) A written certification from the owner of the property that they will complete the required work inside the 12 months period.
- 5.22 If a property owner is unable to comply with the standards, for example they wish to complete reinstatement within 18 months, then the house owner needs to demonstrate to the Council they will do so, by applying for a resource consent.
- 5.23 Overall this is an approach to building relocation that promotes the relocation of buildings that comply with the required standards, while identifying those aspects of the building that need to be upgraded as part of the building

consent application. The Council has control over building relocations that are outside of the permitted standards, by requiring a resource consent and setting in place other requirements to be monitored and complied with.

5.24 Pre-Inspection/ Reinstatement Report

5.25 A key aspect of the Association's contention that relocated buildings can be suitably managed with permitted activity status, is through the use of a pre-inspection/reinstatement report (a suggested template for which is attached to the Association's submission).

5.26 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 technique to gaining compliance with the outcome of a recycled being well reinstated into the new location.

5.27 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).

5.28 The extra requirement of the pre-inspection report acts as a balance, and means that there is a control mechanism for the Council and house owner to know what work is required to reinstate the house onto the new 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.

6.3 There are other Council's 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 applications that meet the required standards. Areas that have moved from a more restrictive regime to allowing permitted activity status include New Plymouth, Central Hawkes Bay, Napier, and the combined Wairarapa Councils.

- 6.4 I encourage the Hearings Panel to see the benefits for the Hutt City area by adopting similar planning controls into the District Plan.

Dated: 16 June 2026

Jonathan Bhana-Thomson

Chief Executive, New Zealand Heavy Haulage Association