

**In the matter of the Resource Management Act 1991**

and

**In the matter of the Central Hawkes Bay District Plan**

and

**In the matter of** submissions by the House Movers Section of the New Zealand Heavy Haulage Association Inc for the Miscellaneous Hearing

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

Dated: 31 October 2022

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**For:** Hearing 6: Miscellaneous

**Hearing date:** 15 – 17 November 2022

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**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 for 18 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. The Association has an advocacy role with central and local government agencies. There are 35 members of the House Movers Section of the Association. By numbers the Association estimates that its members move about 70% of the buildings relocated in any one year nationally. 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. Summary of Evidence**

2.1 The Association supports:

(a) the permitted activity status, with standards, for relocated buildings in the following zones (see 42A Report at [7.3.7]):

(i) Large Lot Residential Zone (LLRZ-R8);

(ii) General Residential Zone (GRZ-R9);

(iii) Rural Production Zone (RPROZ-R13);

(iv) General Rural Zone (GRUZ-R13)

(v) Rural Lifestyle Zone (RLZ-R9);

(vi) Settlement Zone (SETZ-R14);

(vii) Commercial Zone (COMZ-R7);

(viii) General Industrial Zone (GIZ-R9).

(b) the recommendation in the s42A Report (at [7.3.9]) for the addition of 'A licenced building practitioner' to the list of approved professionals who can undertake a building pre-inspection report.

2.2 The Association does not support:

(a) The performance standard for relocated buildings that Council must be notified 48 hours in advance of the relocation (s42A Report at [7.3.12])

(b) The performance standard that relocated buildings are to be placed on permanent foundations in 2 weeks (s42A Report at [7.3.17]).

2.3 This evidence addresses:

(a) Amendment to performance standards for relocated buildings

(b) Pre-inspection / reinstatement report;

(c) Controls in other districts.

(d) Schedule 1: Map of activity status of relocated buildings

(e) Schedule 2: Sequence of Relocation of Buildings

### **3. Amendment to performance standards for relocated buildings**

#### *Notification Requirement*

3.1 The Association is seeking that the requirement to notify Council 48 hours in advance is deleted.

3.2 Contrary to the comment in the s42A Report (at [7.2.14]), we did include in our submission to the Proposed Plan, our rationale as to why we seek the deletion of the notification requirement standard:

13. The Association opposes permitted activity standard 5 which currently provides that Council be notified of the intended delivery date at least 48 hours before the building is relocated and that relocation must not be undertaken until the site is visited by Council officers to inspect the standard of the site, footpath, vehicle entrance and road.

14. This control is not one that should be in the District plan as it is not a planning control, but rather a roading issue regarding the potential of damage to the footpath. Although the

Association understands that avoidance of damage to footpaths is a concern of the Council, the Association does not believe that the inclusion of this as a permitted activity standard is the appropriate place for it.

15. The Association requests this condition be removed from the permitted activity standards.

- 3.3 As shown above, our submission was that this notification control is not one that should be in the District plan (as it is not a planning control), but rather a roading issue regarding the potential of damage to the footpath.
- 3.4 Although the Association understands that avoidance of damage to footpaths is a concern of the Council, the Association does not believe that the inclusion of this as a permitted activity standard is the appropriate place for it.
- 3.5 The Association notes the point in the Planners report (at [7.3.11]) that in order for the 12 month reinstatement period to be certain, that the date of movement needs to be known to the Council. We accept that notice should be given for the purpose of the planning controls on relocated buildings in the Central Hawkes Bay area – but not for the purpose of the inspection of the footpath, and alike.
- 3.6 Therefore, should the clause in the Proposed Plan be adjusted to reflect the reason for the notification being to set the final completion date for notification – and this could be achieved by deleting the second sentence in this standard.

*Timeframe for placement on permanent foundations*

- 3.7 The Association is seeking that the performance standard for permitted activity status for a relocated building to be placed on permanent foundations is changed from 2 weeks to 2 *months*.
- 3.8 Contrary to the comment in the Planners report at 7.2.17, we did include our rationale as to why we seek this change in our submission to the Proposed Plan.
- 3.9 We noted in our submission that most house relocation companies would seek to place relocated houses on permanent foundations when the building arrives to site as this is the most time-efficient and cost-effective way of achieving this.

- 3.10 However, we noted that in some situations this practice may vary due to site or weather conditions beyond the control of the house relocation company. We provided two examples:
- (a) When houses are relocated during winter, the presence of wet, sodden ground may mean that a house planned for positioning on permanent foundations is delayed unexpectedly.
  - (b) Changes in ground conditions may result in variations to the original plans which require engineering approval.
- 3.11 The evidence of Elwyn Fryer, filed together with my statement of evidence at this hearing, sets out some situations where the 2 week standard would be difficult to meet.
- 3.12 We support the Council's concern that it is unsuitable for houses to be placed on temporary foundations for extended periods of time (s42A Report at [7.3.15]). However we would like to extend the current tight time from of two weeks to allow for the uncertainties that can happen.
- 3.13 Technically, if due to unforeseen circumstances that the placement on permanent foundations does not occur within the two week period, then permitted activity status would no longer be applicable, and a resource consent would then need to be applied for. This is not a desirable outcome.
- 3.14 Our experience is that if a definite process is in place that includes an inspection of the building in advance, identifying the reinstatement work to be completed, an indication of the price the complete these works, the application for the building consent for the foundations and any other works, the timeline to place the building on foundations, and finally the completion time of 12 months, then this sets in process a clear set of steps for the house relocation project.
- 3.15 The Association seeks a timeline that would allow for the occasional variation to the foundation installation process, but without giving the indication to house owners that they have a longer period in which to install their footings.
- 3.16 On that basis we would be prepared to consider a compromise timeline for the installation of permanent foundations of 4 weeks.

#### **4. Pre-Inspection/ Reinstatement Report**

- 4.1 The Association's original submission to the proposed Central Hawkes Bay plan attached a copy of a 'building pre-inspection report' – which the Association generally supports.
- 4.2 Some Councils have adopted (or adapted) the Association's pre-inspection report and have published their own version (for recent examples, see Hastings District, and Queenstown Lakes).
- 4.3 In general, the Association does support the requirement of a pre-inspection report in the plan generally, and the pre-inspection report in the Association's submission addresses reinstatement matters.

#### **5. Other territorial authorities in New Zealand**

- 5.1 As shown by the map provided at **Schedule 1**, relocation of buildings is now typically a permitted activity in most Council areas around New Zealand, subject to reasonably consistent performance criteria from Council to Council.
- 5.2 As 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.

Dated: 31 October 2022

**Jonathan Bhana-Thomson**

*Chief Executive, New Zealand Heavy Haulage Association*

### Schedule 1: Activity Status for Relocated Buildings across New Zealand



## Schedule 2: Sequence of Relocation of Buildings

1. I set out the sequence of relocation of buildings:
2. 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.
3. 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. 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. 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.
  6. 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.
  7. 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.

8. 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.
9. 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.
10. 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.
11. 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.
12. 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.
13. 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).
14. 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.

15. 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.
16. 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.