Draft first set of National Planning Standards

Submission Reference no: 13

Brett Rodgers, Sunshine Homes & Cabins Limited (Brett Rodgers)

Source: Ema

Overall Position: Oppose n Part

Clause

Overarching comment

Notes

We do not support the National Planning Standards definitions (CM-1) unless a definition of “Reocatable building” that excludes “New, Prefabricated Housing” is provided. We do not support the National Planning Standards definitions (CM-1) unless a definition of ‘reocatable building’ that excludes “New, Prefabricated Housing” is provided.

Clause

Add to definition

Notes

We require a definition of ‘reocatable building’ to be included in the National Planning Standards, that states: Any previous y used building transported n who e or n part from ts org na s te to ts dest nat on s te; but exclude any new prefabricated building de vered e ther n who e or n part to ts dest nat on s te. The Government’s ‘KwBu’ programme aims to de ver 100,000 quota y, afford e houses over the next decade n an effort to a evate Nea’s hous ng cr ss. The Minister of Hous ng and Urban Deve opment, Honourable Ph Twyford, stated pub cly that he hopes that more than half of these ‘KwBu’ homes w be prefabricated. Th s recognises that the use of prefabricated construction methods can increase the supply of quota y hous ng over a short period of time, wh e reduce ng waste, energy and greenhouse gas em ss ons compared to hous ng prov ded va trad ton on s te construct on methods. 2. For ca rty, a ‘prefabricated’ building one that s e ther assemb led on ts dest nat on s te from pre-bu t parts (components, pane s and/or vo umes), or manufactured in a yard or factory as a compete building and transported ts fn shed form to ts dest nat on s te (‘transportable building’). PrefabNZ’s Glossary of Re evant Terms prov ded as Attachment 2 to the submission. 3. Although District and City Plans do not typca y refer to construct on methods (be ng pr mar y concerned with adverse effects of deve opment), some p ans trigger the need for Resource Consent for prefabricated housing (part cu ary transportable building) due to the way that definitions regarding ‘reocatable building’ are drafted and interpreted. 4. For example, some District Plans require Resource Consent for new prefabricated building as an definition thereof do not exist, or are unclear about whether new prefabricated building (part cu ary transportable building) are included with the definition of ‘reocatable building’. 5. Please refer to Attachment 1 for three examples of how prefabricated housing is addressed across the country, with n n es and definitions for ‘reocatable building’. Th s ranges from: Resource Consent being required for new transportable housing in areas under ‘reocatable building’ (Pallister North). No add to definition. 6. We be eve that new, prefabricated housing (nc udng transportable housing) should be subject to the same rules as housing being on in the district. 7. There is therefore a requirement that a standard definition of ‘reocatable building’ be included in the National Planning Standards to exclude new prefabricated housing and thereby ensure a far and consistent approach across New Zealand. This w remove any unntended p an ng barriers to prefabricated housing and better enable the Government to achieve its ‘KwBu’ targets. We require a definition of ‘reocatable building’ to be included in the National Planning Standards, that states: Any previous y used building transported n who e or n part from ts org na s te to ts dest nat on s te; but exclude any new prefabricated building de vered e ther n who e or n part to ts dest nat on s te.

Clause

Notes

e support the definition of ‘building’, which does not distinguish against prefabricated construction methods.
We support the definition of 'residential activity', which does not discriminate against prefabricated construction methods.

We support the definition of 'residential unit', which does not discriminate against prefabricated construction methods.

Do you have any further comments you wish to make about the Government’s proposals?

We welcome the opportunity to collaborate with MFE in the drafting of any other definitions that may impact prefabricated buildings.
<p><strong>Draft first set of National Planning Standards</strong></p><p>1. Do you support the draft first set of National Planning Standards?</p><p>| Yes | ☒ | No | ☐ |</p><p>We do not support the National Planning Standards definitions (CM-1) unless a definition of ‘relocatable buildings’ that excludes “New, Prefabricated” housing is provided.</p>
2. CM-1: Definitions standard

1. The Government’s KiwiBuild programme aims to deliver 100,000 quality, affordable houses over the next decade in an effort to alleviate New Zealand’s housing crisis. The Minister of Housing and Urban Development, Honourable Phil Twyford, stated publicly that he hopes that more than half of these KiwiBuild homes will be prefabricated. This recognises that the use of prefabricated construction methods can increase the supply of quality housing over a short period of time, while reducing waste, energy and greenhouse gas emissions compared to housing provided via traditional onsite construction methods.

2. For clarity, a ‘prefabricated’ building is one that is either assembled on its destination site from pre-built parts (components, panels and/or volumes), or manufactured in a yard or factory as a complete building and transported in its finished form to its destination site (‘transportable buildings’). PrefabNZ’s Glossary of relevant terms is provided as Attachment 2 to this submission.

3. Although District and City Plans do not typically refer to construction methods (being primarily concerned with adverse effects of development), some plans trigger the need for Resource Consent for prefabricated housing (particularly transportable buildings) due to the way that definitions regarding ‘relocatable buildings’ are drafted and interpreted.

4. For example, some District Plans require Resource Consent for new prefabricated buildings as Plan definitions either do not exist, or are unclear about whether new prefabricated buildings (particularly transportable buildings) are included within the definition of ‘relocatable buildings’.

5. Please refer to Attachment 1 for three examples of how prefabricated housing is addressed across the country, within rules and definitions for
‘relocatable buildings’. This ranges from:

- Resource Consent being required for new transportable housing in residential zones under ‘relocatable building’ rules; with no definition of ‘relocatable building’ (Palmerston North).

- No additional Resource Consent being required due to the exclusion of new prefabricated buildings in the definition of ‘relocatable buildings’ (Central Hawkes Bay).

- No rules or definitions regarding ‘relocatable buildings’ in residential zones, meaning that housing is not differentiated by construction method (prefabricated vs. non-prefabricated) (Auckland).

6. We believe that new, prefabricated housing (including transportable housing) should be subject to the same rules as housing built on-site (i.e. maximum height, site coverage and boundary setbacks etc). New prefabricated housing should not be subject to additional rules, over and above those applicable to housing built via traditional, onsite construction methods; such as those rules regarding ‘relocated building’. There are arguably far fewer adverse effects on the environment from a new, prefabricated house placed on a site than a house constructed via traditional methods, which can create noise and visual effects over a period of time.

7. It is therefore critical that a standard definition of ‘relocatable building’ is included in the National Planning Standards to exclude new prefabricated housing and thereby ensure a fair and consistent approach across New Zealand. This will remove any unintended planning barriers to prefabricated housing and better enable the Government to achieve its KiwiBuild targets.
Individual definitions

- We support the definition of ‘building’, which does not discriminate against prefabricated construction methods.

- We support the definition of ‘residential activity’, which does not discriminate against prefabricated construction methods.

- We support the definition of ‘residential unit’, which does not discriminate against prefabricated construction methods.

Additional definition

- We require a definition of ‘relocatable building’ to be included in the National Planning Standards, that states: Any previously used building transported in whole or in part from its original site to its destination site; but excluding any new prefabricated building delivered either in whole or in part to its destination site.

Other comments

1. Do you have any further comments you wish to make about the Government’s proposal?

We welcome the opportunity to collaborate with MFE in the drafting of any other definitions that may impact prefabricated buildings.

Releasing submissions

Your submission may be released under the Official Information Act 1982 and will be published on the Ministry’s website. Unless you clearly specify otherwise in your submission, we will consider that you have consented to both your submission and your name being posted on the Ministry’s website.
When your submission is complete
If you are emailing your submission, send it to PlanningStandards@mfe.govt.nz as a:

- If you are posting your submission, send it to National Planning Standards, Ministry for the Environment, PO Box 10362, Wellington 6143.

Submissions close at 5:00 pm on Friday 17 August 2018.
## Resource Consent Barriers for Prefabricated Housing

### So what’s the problem?

Some district and city plans require additional resource consent for prefab housing, for example where transportable prefab housing is considered as a ‘relocated building’

<table>
<thead>
<tr>
<th>Plan</th>
<th>Rule</th>
<th>Definition</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Palmerston North District Plan</td>
<td>Rule 10.6.2.1 – relocated houses (which comply with specified performance conditions), are controlled activities in respect of external appearance</td>
<td>No definition of ‘relocated houses’</td>
<td>Resource consent for transportable prefab housing is required, even if all other rules are met. Controlled activities must be granted by councils &amp; conditions can be imposed (including a bond). The lack of a definition for ‘relocated houses’ creates uncertainty</td>
</tr>
<tr>
<td>Central Hawkes Bay District Plan</td>
<td>Rule 12.3.1(a) – relocation of building(s) for an activity shall be a discretionary activity</td>
<td>Relocation in relation to a building, means the removal and re-siting of any building from any site to another site. <strong>This definition does not apply to a new building that is being built off-site for the express purpose of being located to the subject site.</strong></td>
<td>Resource consent for prefab housing is not required due to the exclusion in the definition (subject to all other rules being met)</td>
</tr>
<tr>
<td>Auckland Unitary Plan</td>
<td>No specific rules for relocated buildings in the residential zones – considered as ‘dwellings’</td>
<td>No definition for relocated/ relocatable/ relocation</td>
<td>Resource consent for prefab housing is not required in residential zones (subject to all other rules being met). Note resource consent may be required in heritage zones</td>
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