

Draft first set of National Planning Standards

SUBMISSION FORM

The Government is seeking views on the draft first set of National Planning Standards.

For more information about the Government's proposals read our National planning standards consultation document available at <http://www.mfe.govt.nz/consultation/draft-national-planning-standards>.

Submissions close at 5:00 pm on Friday 17 August 2018.

Making a submission

You can provide feedback in three ways:

1. Use the online submission form available at <http://www.mfe.govt.nz/consultation/draft-national-planning-standards>. This is our preferred way to receive submissions.
2. Complete this submission form and send it to us by email or post.
3. Write your own submission and send it to us by email or post.

Publishing and releasing submissions

All or part of any written submission (including names of submitters) will be published on the Ministry for the Environment's website www.mfe.govt.nz. Unless you clearly specify otherwise in your submission, we will consider that you have consented both your submission and your name being posted to the Ministry's website.

Contents of submissions may be released to the public under the Official Information Act 1982 following requests to the Ministry for the Environment. Please advise if you have any objection to the release of any information contained in a submission and, in particular, which part(s) you consider should be withheld, together with the reason(s) for withholding the information. We will take into account all such objections when responding to requests for copies of, and information on, submissions under the Official Information Act.

The Privacy Act 1993 applies certain principles about the collection, use and disclosure of information about individuals by various agencies, including the Ministry for the Environment. It governs access by individuals to information about themselves held by agencies. Any personal information you supply to the Ministry in the course of making a submission will be used by the Ministry only in relation to the matters covered by this consultation. Please clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that the Ministry may publish.

Submission form

The questions below are a guide only and all comments are welcome. You do not have to answer all of the questions. To ensure your point of view is clearly understood, please explain your rationale and provide supporting evidence where appropriate. The structure of this form is in line with the draft first set of national planning standards as shown in the overview section tables 1 and 2.

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Submitter type*	Individual	<input type="checkbox"/>
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	Business / Industry	<input checked="" type="checkbox"/>
	Local government	<input type="checkbox"/>
	Central government	<input type="checkbox"/>
	Iwi	<input type="checkbox"/>
	Other (please specify)	<input type="checkbox"/>

[Click here to enter text.](#)

* Questions marked with an asterisk are mandatory.

Draft first set of National Planning Standards

1. Do you support the draft first set of National Planning Standards?

- Yes
- No

We do not support the National Planning Standards definitions (CM-1) unless a definition of 'relocatable buildings' that excludes new, prefabricated housing is provided.

2. CM-1: Definitions standard

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 prefabricated¹. 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 methods².

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.

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.

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'.

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) (Auckland³).

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

¹ <https://www.stuff.co.nz/national/politics/104973164/NZ-and-overseas-companies-asked-to-ramp-up-prefab-ops-for-Kiwibuild?cid=app-iPhone>

² Burgess J, Buckett N, Page I (2013) *Prefabrication impacts in the New Zealand construction industry*. Study Report No.279, BRANZ.

³ with the exception of heritage zones rules

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.

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

3. 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.

Please check this box if you would like your name, address, and any personal details withheld.

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'

Plan	Rule	Definition	Outcome
Palmerston North District Plan	Rule 10.6.2.1 – relocated houses (which comply with specified performance conditions), are controlled activities in respect of external appearance	No definition of 'relocated houses'	Resource consent for transportable prefab housing is required, even if all other rules are met. Controlled activities must be granted by councils & conditions can be imposed (including a bond). The lack of a definition for 'relocated houses' creates uncertainty
Central Hawkes Bay District Plan	Rule 12.3.1(a) – relocation of building(s) for an activity shall be a discretionary activity	Relocation in relation to a building, means the removal and re-siting of any building from any site to another site. <u>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.</u>	Resource consent for prefab housing is not required due to the exclusion in the definition (subject to all other rules being met)
Auckland Unitary Plan	No specific rules for relocated buildings in the residential zones – considered as 'dwellings'	No definition for relocated/ relocatable/ relocation	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



THE BASIC GLOSSARY

Prefab^{NZ} OF PREFABRICATION

Call it prefab, offsite, modular or...

Here we make a start at demystifying the innovative design and construction world of the future.
Join us at PrefabNZ, the hub for innovative construction in New Zealand

A _____
B _____



block

Another term for a volume, module, pod or unit. It is a three-dimensional room-sized prebuilt piece.

C _____



cartridge

Closed panel containing services, ducts, electrical conduits etc.



cassette

A structural floor panel usually of steel or timber that may or may not contain services.



chunk

A grouping of pre-formed materials into a complex component or module, prior to assembly at the construction site.



CLT - Cross Laminated Timber

A generic name given to large structural building panels made from solid wood boards glued together in layers. Like plywood, CLT panels are very strong because the layers of boards run in opposing directions.



closed panel

A panelised element that consists of framing with cladding or lining, or both. It may also include integrated services such as plumbing ducts and electrical conduits. See also open panel.



complete buildings

or complete building prefabrication

Fully-finished volumetric construction. It is typically yard or factory finished internally (and possibly also externally), to make a single building or parts of a multi-unit building. In New Zealand, complete building prefabrication includes the traditional transportable housing industry.



component-based or componentised

Components are relatively small scale items that are invariably assembled offsite, such as light fittings, windows, and door furniture. It includes structural members (trusses and frames), fittings, fixtures, and joinery that is cut, sized or shaped away from the site for assembly on site.



custom building

Custom designed buildings, or custom-built on-site from "standard" materials with on-site labour-intensive processes.

D _____
E _____
F _____



flat-pack

This is a collection of panels transported in one package to site. Refer to panelised prefabrication.

G _____
H _____



hybrid-based or hybridised prefabrication

Hybrid-based prefabrication is also referred to as semi-volumetric prefabrication. It consists of a mixture of volumetric or modular units and non-volumetric or panelised units (module plus panel). It may also include component and site-built elements.

I _____
J _____
K _____



kit, kit-of-parts, or kitset

This is the set of components prepared away from the construction site which are then assembled on site. Refer to component-based prefabrication.

L _____
M _____



mobile home

This is an obsolete term for manufactured housing in the United States. Mobile or manufactured buildings incorporate their own chassis for transportation by road. A mobile home is manufactured away from site, and transported to the site in a largely completed state with minimal on-site labour. The mobile term is sometimes used incorrectly in New Zealand to refer to transportable dwellings that do not have a chassis.



mod-lines

After a modular home has been set in place, or assembled on site, the joints between the modular volumes are finished. This is referred to as finishing the mod-lines. This work includes exterior cladding, interior linings and any joining of wiring, plumbing or mechanical systems.



modular building

This is usually a building designed using three-dimensional volumes, units or pods. Sometimes it also refers to a building that is made up of standard materials in set sizes or 'modules'. A modular building meets local building codes and is permanently fixed to a foundation on site.

N
O



open panel

An open panel is a panelised element that consists of framing without cladding or lining. See also closed panel.

P



panel-based or panelised

These are planar units that do not enclose usable space, such as panel systems and cladding panels. They may include windows, doors or integrated services, and are either open-framing or closed-in with cladding and/or lining. They are transported to site as flat-packs.



pod

A pod is a non-structural volume. A utility pod contains bathroom, kitchen or laundry functions. The open-source UNIpod includes all three functions. Refer to volumetric prefabrication.



portable building

Portable buildings are generally those intended for short-term temporary applications such as utilities at events or site offices. Portable housing infers a small dwelling such as a cabin, studio or sleep-out. It is a commonly misused term, and the term transportable is more applicable to permanent housing. Both portable and mobile terms infer a temporary lifespan and lower quality.



pre-

This prefix indicates any work that is carried out away from site. The specific type of work follows the prefix. For example, "pre-engineered" or "pre-assembled".



pre-cut, pre-sized or pre-shaped

This refers to materials that are cut, sized or shaped away from site for assembly at the site. Refer to component-based prefabrication.



prefab, prefabricated or offsite

This term is wide open to interpretation but generally refers to on-site assembly from pre-built components. The components are either generally available when the structure is designed or they are created specifically for the project or designed for reproduction.



pre-nailed

This refers to complex components of materials that are cut, sized or shaped and joined together using nail-plate technology. Nail-plate technology comprises engineering software, computer-controlled cutting machinery, and steel plate fasteners. It is a technique commonly used for roof trusses and wall framing in traditional New Zealand housing construction.



PMC - Permanent Modular Construction

This is a North American term for a building made up of three-dimensional structural volumes or modules fixed to a foundation for long-term use.

Q
R
S



semi-volumetric prefabrication

This is an interchangeable term with hybrid prefabrication. Refer to hybrid prefabrication.



setting

The process of setting a prefabricated house is the assembly at site of modular volumes transported by truck and positioned by crane. The final site-based work is construction to exposed joints between modules, or mod-lines. Refer to mod-lines.



SIPs - Structurally Insulated Panels

Panels are typically made using expanded polystyrene (EPS), or polyisocyanurate rigid foam insulation sandwiched between two structural skins of metal or oriented strand board (OSB). SIPs are used as building panels for floors, walls and roofs in residential and commercial buildings.



stick-based prefabrication

Stick prefabrication refers to lengths of timber which are pre-cut, pre-sized or pre-shaped puzzle-type pieces brought to site for assembly. Refer to componentised or pre-cut prefabrication.

T



transportable building

Transportable buildings are newly built to order from a yard or factory in order to be moved to another location. Existing older buildings that are moved to a new location are known as relocatable. Refer to complete building.

U
V



volumetric

Volumetric prefabricated units enclose usable space and are then installed within or onto a building or structure. They are typically fully finished internally, such as toilet/bathroom pods or plant-rooms. Refer to pod.