



# 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](http://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.

### Contact information

Name*	<input type="text"/>														
Organisation (if applicable)	<input type="text"/>														
Address	<input type="text"/>														
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Email*	<input type="text"/>														
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[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

I 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, Phil Twyford, stated publicly that he hopes that more than half of these KiwiBuild homes will be prefabricated<sup>1</sup>. 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<sup>2</sup>.

For clarity, a 'prefabricated' building is one that is either assembled on its destination site from pre-built components, or manufactured in a yard or factory and transported in its finished form to its destination site ('transportable buildings').

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 prefabricated housing in residential zones under 'relocatable building' rules; with no definition of 'relocatable building' (Palmerston North). It is not appropriate to require resource consent for something that is not defined.
- no additional resource consent being required due to the exclusion of new prefabricated buildings in the definition of 'relocatable buildings' (Central Hawkes Bay). This approach provides clarity.
- no rules or definitions regarding 'relocatable buildings' in residential zones, meaning that housing is not differentiated by construction method. This approach is acceptable in that it does not discriminate between prefabricated and non-prefabricated housing typologies (Auckland<sup>3</sup>).

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

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

<sup>2</sup> Burgess J, Buckett N, Page I (2013) *Prefabrication impacts in the New Zealand construction industry*. Study Report No.279, Building Research Association of New Zealand.

<sup>3</sup> Note that resource consent for relocated buildings may be required in heritage zones.

regarding 'relocated buildings'. 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.

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, enhance opportunities to increase housing supply, and better enable the Government to achieve its KiwiBuild targets.

#### Individual definitions

- I **support** the definition of '**building**', which does not discriminate against prefabricated construction methods.
- I **support** the definition of '**residential activity**', which does not discriminate against prefabricated construction methods.
- I **support** the definition of '**residential unit**', which does not discriminate against prefabricated construction methods.

#### Additional definition

- I **request** that a definition of '**relocatable building**' 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.*

## Other comments

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

No.

## 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.

Note that the name, email, and submitter type fields are mandatory for you to make your submission.

## When your submission is complete

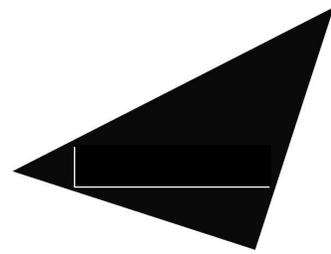
If you are emailing your submission, send it to [PlanningStandards@mfe.govt.nz](mailto:PlanningStandards@mfe.govt.nz) as a:

- PDF
- Microsoft Word document.

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