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To:

Government Policy Statement on Housing and Urban Development (GPS-HUD) Consultation  
Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development (HUD)  
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## Submission on Government Policy Statement on Housing and Urban Development (GPS-HUD)

Crystal Olin, Kimberley O'Sullivan, Jenny Ombler, Philippa Howden-Chapman, Karen Witten, Michael Keall, Erica Hinckson, Scott Duncan, Tania Ka'ai, Vivienne Ivory, and Amanda Yates, for the public good research programmes **Public Housing and Urban Regeneration: Maximising Wellbeing** (NZ Centre for Sustainable Cities | University of Otago, Wellington); **Te Hotonga Hapori | Connecting Communities** (AUT); and **Building Better Homes, Towns and Cities National Science Challenge – Huritanga: Regenerative Urbanism Tools & Tactics for Holistic Urban Wellbeing** funded by the Ministry of Business, Innovation and Employment (MBIE).

### About the submitters

#### ***Public Housing and Urban Regeneration: Maximising Wellbeing***

This five-year research programme examines and compares different public housing organisations' arrangements for how they design and deliver housing and urban regeneration projects. Our aim is to understand how to optimise tenant and community wellbeing by providing effective and environmentally sustainable public housing. Our multidisciplinary team from several collaborating partners is led by Distinguished Professor Philippa Howden-Chapman from the New Zealand Centre for Sustainable Cities, University of Otago, Wellington.

#### ***Te Hotonga Hapori | Connecting Communities***

Te Hotonga Hapori (Connecting Communities) is a five-year research programme on large scale, multi-billion-dollar urban redevelopment projects by Kāinga Ora and Isthmus (integrated design studio).

The overarching aim of urban redevelopment is to improve liveability, social cohesion, and place-based identity by providing more affordable homes and shared community spaces, says Te Hotonga Hapori

research lead Associate Professor Scott Duncan. “This research will give developers and policymakers essential information on the multifaceted impact of urban redevelopment on the people of New Zealand, including mental and physical health and a sense of community and place. Findings will give direction to further improvements.

### ***Building Better Homes, Towns and Cities National Science Challenge***

The mission of the Building Better Homes, Towns and Cities (BBHTC) National Science Challenge is to help transform dwellings and places where people live into homes and communities that are hospitable, productive, and protective. Our vision is to create built environments that build communities. To create homes, neighbourhoods, towns, and cities that enrich people's lives, allowing them to reach their social, cultural, and economic potential.

Launched in May 2016, the Building Better Homes, Towns and Cities National Science Challenge is focusing on improving the quality and supply of housing, and creating smart and attractive urban environments. This work takes place in broader research that can be used by the building sector, as well as householders, regulators, building owners and communities. This Challenge, hosted by [BRANZ](#), is researching how innovation and technology can be better adopted by and embedded into the New Zealand building industry. Multi-disciplinary researchers are collaborating to create practical solutions that bring long-term transformational benefits for New Zealanders in how our homes, towns and cities function.

The Huritanga: Regenerative Urbanism Tools & Tactics for Holistic Urban Wellbeing programme is a Kaupapa Māori and action-research programme focused on developing tools, tactics and pilot projects that enhance urban social, cultural and ecological wellbeing in an era of ecological emergency. We work with communities – Iwi, Councils, urban interest groups – to co-create wellbeing-led transformative action tools and tactics. We aim to test these tactics in place via pilot schemes and collaborations with communities and developers.

### **Key points of this submission**

Broadly speaking, we agree with the proposed vision, but believe the outcomes and focus areas could and should go further in order to meet urgent urban wellbeing needs. We support the Government’s commitment to realising a better housing and urban future for Aotearoa New Zealand through direct support; reliable investment; fit-for purpose regulatory; institutional and policy settings; partnering with iwi and Māori; and leading by example. ***However, the statement should go a step further by:***

- more widely supporting and enabling a thriving future for Māori by thinking outside of conventional models of urban development to better acknowledge unique values and include different housing and tenure
- particularly this involves shifting the emphasis from the singular house to more collective-oriented housing models such as papakāinga, co-housing and other shared or socially-based tenure options
- further and although not discussed in detail here, the GPS should more clearly and systemically connect into Aotearoa New Zealand’s stated goals and aspirations for decarbonising and improving the ecological wellbeing and functioning of our cities
- including through improving the walkability of neighbourhoods, and the availability of public transport
- and incorporating sustainable infrastructure

## ***The future we want to see***

We agree that the future we want to see is one in which “everyone in Aotearoa New Zealand lives in a healthy, safe, secure, and affordable home that meets their needs, within a thriving, inclusive and sustainable community.” However, there is not enough emphasis put on supporting and enabling this future for Māori – including Māori- and Iwi-led solutions that support the exercise of tino rangatiratanga – which means thinking outside of conventional models of urban development to better acknowledge unique values and include different housing and tenure options. We would like to see some revisions made to the list of what this vision entails, with the overarching aim “that our urban environments are able to sustain a way of life that Māori and Pākehā collectively have reason to value” (Coulson et al., 2020, p. 7):

This vision:

- integrates urban development and housing with sustainable lifestyle and transport options
- includes and focuses on **co-creating great places for** people in many contexts and settings
- aspires to providing a greater range and quality of medium density housing and tenure models via compact, walkable development
- recognises the need to retrofit many lower density suburban neighbourhoods to increase walkability and density
- requires us to support, enable and respond to iwi and Māori housing aspirations, including those which are intergenerational or socially tenured
- permits and requires us to consider that individual places are unique **and hold social, cultural and/or environmental value**, as well as **being** national settings
- is aspirational and captures notions of quality of life and wellbeing, including environmental quality and climate change
- validates a variety of different housing and urban needs and beliefs about housing, such as the need for affordability, accessibility for **Māori, young people**, disabled people and older people, aging-in-place **and those with intergenerational aspirations**
- speaks to community empowerment, including **Māori** exercising tino rangatiratanga

## ***Outcomes***

Broadly speaking, we agree with the four aspirational outcomes proposed for the housing and urban development system to work towards, in support of achieving the GPS-HUD vision. However and as premised above, we believe that some amendment is needed to more explicitly emphasise acknowledgement of and support for the housing needs and aspirations of Māori, so as to better enabling a future in which they live in healthy, safe, secure, and affordable homes that meets their needs, within thriving, inclusive and sustainable communities. Suggestions are made in the following four sections for potential emphasis of this area in each of the four proposed outcomes:

- Thriving communities
- Wellbeing through housing
- Partnering for Māori housing and urban solutions
- An adaptive and responsive system

## **Thriving communities**

Thriving place-based communities are formed through a combination of factors enhanced by neighbourhood settings that are compact and walkable within an accessible and relatable scale: interaction between residents (both planned and spontaneous interaction), residents experiencing a sense of belonging and attachment to both place and other people in that place, residents taking part in common activities and ‘street life’ – such as markets, street festivals, meeting up with friends, children and youth playing or hanging out, etc (Kearns et al., 2017).

On a deeper level, communities thrive when they experience ‘whanaungatanga’ (close interpersonal connection or kinship), including social support and shared experiences that contribute to “a sense of collective belonging, obligations and reciprocal caring” (Coulson et al., 2020, p. 3).

Communities are also enhanced when their social and/or cultural identities help to shape the places where they live, and the built or natural landscapes that surround them hold important meanings or stories which they can access (Filep, Thompson-Fawcett, & Rae, 2014; Puketapu-Dentice, Connelly, & Thompson-Fawcett, 2017). “Ukaipotanga’ is a metaphorical term that highlights the importance of urban environments in promoting a sense of Māori identity and belonging. The enduring consequences of colonisation’s “usurpation of Māori sovereignty” (Lawson-Te Aho et al., 2019, p. 2) include the absence of “visible Māori identity” in many of our cities and neighbourhoods (Thompson-Fawcett, Kitson, & Barry, 2019, p. 1):

*“[Y]ou've got to believe it comes at a social cost for Maori youth to be growing up in an environment where your culture's alien, where it's invisible - not just marginalised, it's not even there.” (The Press, 2013).*

As Aotearoa New Zealand grows and develops, we have a collective responsibility to ensure that all New Zealanders – including Māori – are part of thriving communities, and (as part of that ) are able to experience a sense of belonging and attachment to the place and people of that place where they live.

As such, we are supportive of the ‘thriving communities’ outcome, but suggest the following re-wording:

Everyone is living in homes **and neighbourhoods that support thriving communities through access to** employment, education, **and opportunities for residents to meet their** social and cultural wellbeing needs and aspirations — places that are affordable, **compact, walkable,** connected, environmentally sustainable, safe, and inclusive.

This means that we expect to see:

- designing to support safe **and convenient** access for the young, elderly, or people with disabilities
- a place-based approach to developing homes and neighbourhoods, making decisions with Iwi and Māori as partners and with local communities, including how those home and neighbourhoods might better contribute to the visibility of Iwi and Māori identity
- considered and well-designed homes and **neighbourhoods**, that connect people to jobs, schools, services, **public gathering spaces, social and cultural hubs**, amenities, sports and leisure activities, and are orientated around public transport and active transport networks
- reduced emissions because of our **compact, walkable** urban design **oriented around** public transport and active transport networks, and improved building processes, **scale, design** and materials
- resolutions to systemic barriers to building on whenua Māori and building papakāinga, such as funding and financing when building on multiply owned Māori land

- communities growing well within environmental limits, **prioritising active travel, compact urban form and energy efficient medium density housing options**, restoring ecosystem health, and actively preparing for, and adapting to, the impacts of a changing climate
- sustainable, resilient and low-emissions infrastructure due to proactive, integrated planning and investment that seeks to maximise wellbeing benefits through compact neighbourhood design and well-connected active and public transport networks

### ***Wellbeing through housing***

To achieve wellbeing through housing, socially responsible design must extend from the wider urban and neighbourhood context through to the individual dwelling, its interface with the public realm and the quality of its interior. Importantly and in addition to the social and community factors mentioned above, wellbeing is interconnected with compact, walkable urban design that encourages active modes of transport (Chaix et al., 2013; Hinckson et al., 2017).

In terms of the individual dwelling, wellbeing is associated with quality, warm and dry homes (Curtis & Brunndon, 2018) and access to useful and meaningful internal spaces and dwelling layout. This includes (amongst other things) considerations about privacy, storage, spatial functionality, and opportunities for place-making or setting up ‘home’ (Smith, Lommerse, & Metcalfe, 2014; Yates, 2011).

Socially responsible design in an indigenous context requires further attention and understanding; for example, about cultural “practices and specific kinship group relationships” (Yates, 2011, p. 124; also see Memmott, 2014). In Aotearoa New Zealand, “there are a range of holistically connected aspects that need to be considered if we are to deliver effective and sustainable solutions” around Māori being “well at home” (Boulton, Allport, Kaiwai, Harker, & Osborne, 2021, p. 1).

As elaborated on further below, the government and other relevant organisations may need to re-think the conventional approaches to housing and urban development if we are to achieve wellbeing for every New Zealander through housing. “Collectively-oriented interventions” (Lawson-Te Aho et al., 2019, p. 2) such as papakāinga or other shared and socially-based tenure options are increasingly sought after, yet are often difficult to realise and not well supported in the current regulatory environment (Berghan, 2020; Ruru, 2017).

Furthermore, important opportunities to enhance wellbeing through connecting with the natural environment should also be prioritised and explored – for example, through water-sensitive design (Afoa & Brockbank, 2019).

As such, we support the ‘wellbeing through housing’ outcome, but suggest the following re-wording to amplify and extend its purpose, recognising the avoidable health and injury burden that is posed by poor housing (Riggs, Keall, Howden-Chapman, & Baker, 2021):

All New Zealanders – **regardless of their demographic** – own or rent a home that is **high quality**, affordable, safe, healthy, accessible, secure, and which meets their **diverse and changing** needs and aspirations.

This means we expect to see:

- the application of Te Tiriti o Waitangi and its principles by the Crown in housing policy and implementation
- that homelessness is rare, brief, and non-recurring
- affordable, high quality, sustainable homes are built and available to rent and buy in locations that are well connected to jobs, services, public gathering spaces, social and cultural hubs, amenities, sports and leisure activities, public transport and each other

- a greater variety of types of homes being built to meet **a growing diversity of people's and families' needs, including** more homes that are designed and built **using universal design standards** to be accessible, safe, **functional and meaningful** regardless of ability, illness or age
- improved quality of existing housing and more homes built with efficient designs **in compact, walkable neighbourhoods** that improve health, energy and climate outcomes
- people living in the homes and communities of their choice, including increased opportunities for developing socially or collectively oriented options.

### ***Partnering for Māori housing and urban solutions***

One of the housing models of importance to mana whenua and Māori is papakāinga, a village or communal living environment that supports Māori and their social tenure aspirations. Given the urban intensification that Aotearoa New Zealand is experiencing, new models of papakāinga might be wanted that draw on medium density housing typologies such as terraced housing or apartment blocks, often called vertical or urban papakāinga (Berghan, 2020). As part of partnering for Māori housing and urban solutions, the GPS-HUD should aim to support and enable papakāinga and other shared or socially-based tenure options across a range of scales, including those which might provide further options in the medium density range.

As such, we support the 'partnering for Māori housing and urban solutions' outcome, and suggest a revised point in support of papakāinga and other shared or socially-based tenure options be added to what we expect to see:

Māori are determining their housing needs and aspirations, supporting whānau prosperity and inter-generational wellbeing, and deciding the means to achieve those aspirations.

This means we expect to see:

- iwi and Māori are supported by the Crown as Te Tiriti o Waitangi partners to lead innovative housing solutions, **including papakāinga and other shared or socially-based tenure options across a range of scales**
- iwi and Māori building autonomy and generating intergenerational health, wealth and wellbeing and sustainable futures through housing **and urban design**
- Government and other decision makers are proactive and responsive, enabling bespoke housing and urban solutions for iwi and Māori including solutions for remote and rural communities
- Māori living in quality homes that meet their needs
- an increase in Māori home ownership
- Māori are developing housing and urban solutions on iwi and Māori owned whenua (including urban and rural whenua Māori and Māori Freehold title) without systemic barriers. For example, funding and financing on multiply-owned Māori land
- kaupapa Māori driven approaches and responses, services, and places for Māori.

### ***An adaptive and responsive system***

It is essential that Aotearoa New Zealand's housing and urban development system is able to adapt and respond to current and future needs – both of our population and of our planet. Growth and change are inevitable – as we have seen with Covid-19. We do not yet know what the country's future will look like post-Covid, but we need to prepare, adapt and respond as that future begins to unfold.

While many aspects of change are unknown, there are nevertheless lessons and research that we can choose to heed. For example, if we are to address the current housing crisis and also future-proof

Aotearoa New Zealand for greater population increase and climate change crises, we cannot continue to adopt or support conventional low-density development that relies on an endless supply of land being freed up for development – it is simply unsustainable – environmentally, economically and socially (Bueno-Suárez & Coq-Huelva, 2020; Newman, Bachelis, & Chapman, 2005).

An adaptive system will support development that is both sustainable and compact. As previously noted, high quality compact development and medium density housing can deliver quality living experiences and deliver on wellbeing goals while avoiding sprawl, protecting valuable land and reducing or rationalising infrastructure demands (Bay & Lehmann, 2017; Bryson & Allen, 2017; Mouratidis, 2018; Witten et al., 2011).

Furthermore and as noted throughout this submission, the system needs to adapt to changing tenure needs and aspirations, enabling and encouraging a diversity of housing options and paths to home ownership. These should prioritise, support and learn from “collectively-oriented interventions” (Lawson-Te Aho et al., 2019, p. 2) such as papakāinga or other shared and socially-based tenure options (Berghan, 2020; Ruru, 2017). This should include allowing for carefully designed, sustainable, in-fill housing and multiple dwellings on single titles to enable intergenerational or community living.

As such, we suggest the following re-wording of the ‘adaptive and responsive system’ outcome:

The housing and urban development system is integrated, self-adjusting, and responsive to emerging challenges and opportunities. The system can **diversify and** meet the **evolving** needs of New Zealanders and provide for **sustainable, compact growth**.

This means we expect to see:

- partnerships and collaboration across the system that meets the **diversifying** needs of communities
- a system that works together to review, respond, and adapt to underlying **and evolving** demand for housing and urban development, and to emerging challenges and opportunities including **shared and socially-based tenure arrangements**
- regulatory and institutional settings that support and facilitate **sustainable** urban change, and public funding and investment settings that maintain stability in construction pipelines and economic cycles
- central and local government putting processes in place to enable joined-up planning and investment that prioritise compact, walkable development patterns to avoid sprawl, protect valuable land and reduce infrastructure demands
- a better understanding of how the system works **and how new demands on the system are continually evolving**, with decisions based on **up-to-date** evidence and insights
- increased productivity, capacity and capability to deliver homes and **neighbourhoods that support community formation and meet the full range of** people’s needs.

### ***Six focus areas***

Broadly speaking, we agree with the six proposed focus areas to help realise the proposed outcomes. However and as premised above, we believe that some amendment is needed to more explicitly emphasise acknowledgement of and support for the housing needs and aspirations of Māori, so as to better enable a future in which they live in healthy, safe, secure, and affordable homes that meet their needs, within thriving, inclusive and sustainable communities. Suggestions are made in the following six sections for potential emphasis of this area in each of the six proposed focus areas and their related actions:

- Ensure that more affordable homes are being built
- Provide homes that meet people’s needs
- Support resilient, sustainable, inclusive and prosperous communities
- Invest in Māori-driven housing and urban solutions
- Prevent and reduce homelessness
- Re-establish housing’s primary role as a home rather than a financial asset

***Ensure that more affordable homes are being built***

Access to adequate housing is a human right. Nevertheless, “New Zealanders face significant challenges with declines in the building of affordable housing, particularly in rental housing, which has contributed to a housing crisis and an increase in homelessness” (Howden-Chapman & Pierse, 2020, p. 802). Yet provision of more affordable homes should not equate to a significant amount of land being freed up for greenfield development. Not only are environmental sustainability considerations important toward this end, but so too are affordability considerations.

Aotearoa New Zealand is experiencing ever-increasing land prices (Page, 2017), which means that low-density development requiring more land (and supporting infrastructure) will cost more than comprehensively designed compact, medium-density development (Güneralp et al., 2020) delivering multiple wellbeing benefits (Howden-Chapman, Early, & Ombler, 2017; Murphy, 2016; Witten & Carroll, 2011).

Furthermore, Aotearoa New Zealand needs urgently to improve the energy efficiency of its existing housing stock, which is amongst the worst in OECD (Howden-Chapman et al., 2009). This needs to be done for all of the reasons expressed in the vision statement, including ecological and environmental reasons. But it is most urgently needed for wellbeing and health equity reasons associated with being able to afford a warm, dry and comfortable home living environment (Howden-Chapman et al., 2012).

As with other systemic inequities noted throughout this submission, Māori are disproportionate affected by housing affordability and energy poverty. Although some improvement has been made in this regard, “Māori and Pacific households retain a higher proportion of households with high housing costs” (Marriott & Sim, 2015, p. 40). The government needs to uphold a new aspirational standard for building energy efficiency and efficacy, with funding prioritised and focused on those in energy poverty, particularly for tamariki and rangatahi Māori who are at increased risk (O’Sullivan et al., 2017; Teariki et al., 2020).

We suggest the following re-wording of this focus area, which should encapsulate affordability with liveability, and not limit government’s focus to new builds at the detriment of existing stock improvements:

***Ensure that affordable and liveable homes are available for all New Zealanders***

We need to **plan comprehensively**, deliver the infrastructure and drive action to build **and retrofit** enough homes to support everybody’s wellbeing and make homes more affordable.

We need to create a housing and urban land market that credibly responds to population growth and changing housing preferences, that is competitive and affordable for renters and homeowners, and is well planned, **well designed** and well regulated.

We have proposed actions for the Government and others to take to ensure that more affordable homes are being built **in a sustainable way and in urban locations that support a reduction in car dependency**.



We would also like to see the following actions proposed:

- **Direct investment in comprehensive planning that prioritises affordable housing provision within compact, walkable development in coordination with existing and planned infrastructure.**
- **Direct investment in retrofitting existing housing stock to achieve energy efficiency and equity.**

### ***Provide homes that meet people's needs***

Not only are the demographics of Aotearoa New Zealand changing and growing, but our country has a colonial history and entrenched patterns of housing and urban development that cater to only a certain portion of the demographic.

Diversifying lifestyle needs and aspirations need to be met by the homes available for purchase or for rent, which is likely to mean that the conventional extremes of low density single-family detached houses and high density inner-city apartments are no longer sufficient (Howden-Chapman et al., 2010; Witten et al., 2011). There is increasing demand for a mix of high quality medium density options (Opit, Witten, et al., 2020; Page, 2017).

Furthermore, we have an opportunity amidst this growth and diversification to take a truly innovative approach in meeting people's housing needs. A "particularly exciting avenue [of] research" growing in recent years focuses "on the innovative application of traditional [indigenous] understandings to current situations and to planning for the future" (Thompson-Fawcett, 2010, p. 12). What can we learn from our pre-colonial past that can contribute to our "urban environments [sustaining] a way of life that Māori and Pākehā collectively have reason to value" (Coulson et al., 2020, p. 7)?

We suggest the following re-wording of this focus area:

### ***Provide a range of homes that meet people's diverse and changing needs***

We want to ensure every New Zealander has an affordable, safe, warm, dry, and accessible home to call their own, and which meets their needs and changing life circumstances – whether they are renters or owners.

We have proposed actions for the Government and others to take to ensure that **a greater range and quality of housing options are available to every New Zealander, so that everyone** has an affordable, safe, warm, dry, and accessible home to call their own.

We would also like to see the following actions proposed:

- **Support and encourage the provision of a greater range and quality of medium density housing options that provide for and encourage intergenerational and community living.**
- **Invest in research that explores innovations in housing and urban development can be gained from an indigenous Māori perspective.**

### ***Support resilient, sustainable, inclusive and prosperous communities***

Resilient, sustainable, inclusive and prosperous communities are supported through the provision of high quality housing and urban development (Kearns et al., 2017; Opit, Carroll, & Witten, 2020; Witten & Ivory, 2018; Witten, Opit, Ferguson, & Kearns, September 2018). Moreover, communities are more likely to thrive and prosper when such development is pursued with or by them in a collaborative way (Anderson

& Baldwin, 2017), which may suggest the need for more cohousing, community-oriented, shared and/or socially-based tenure options being supported by Government (Berghan, 2020).

Māori culture offers three core values which should be used to pivot our collective understanding of resilient communities: (1) whakapapa or “relationship to land”, (2) whanaungatanga or “collective decision making for the good of all”, (3) and kaitiakitanga or “stewardship of the environment and the culture” (Coulson et al., 2020, p. 7).

As such, we suggest the following changes to this focus area, including the incorporation of core Māori values:

#### *Support resilient, sustainable, inclusive and prosperous communities*

We need our communities to be well equipped to meet long-term climate, social, environmental, cultural, and economic challenges and opportunities. **In other words, our communities need to embody whakapapa, whanaungatanga and kaitiakitanga.**

We have proposed actions for the Government and others to take to support resilient, sustainable, inclusive and prosperous communities **through collaboratively designed housing and urban development solutions.**

We would also like to see the following action proposed:

- **Direct investment in collaborative design approaches to inform and realise housing and urban development solutions, including those initiated or led by communities themselves (such as papakāinga and co-housing).**

#### *Invest in Māori-driven housing and urban solutions*

The New Zealand government should not only invest in, but prioritise and help to enable Māori- and Iwi-driven solutions. In doing so, a model of “decision-making power that treats Māori as simply another interest group” is not sufficient. Rather, Māori are – and should be treated as – “holders of sovereign kāwanatanga (governance), tino rangatiratanga (control and self-determination) and ōritetanga (equity)” in all efforts to drive housing and urban solutions (Ombler, Russell, & Rivera-Muñoz, 2016, p. 22). Whilst kaupapa Māori and partnership approaches have increasingly become part of common discourse around Aotearoa New Zealand, the “conventional planning approach follows a technocratic, linear path focused on the outcome or desired output” that does not often enough value Māori as equal decision makers (Puketapu-Dentice et al., 2017, p. 5). If Māori and Iwi representatives are not given decision making powers, and when resourcing of Māori and cultural competency training across relevant organisations are not prioritised, ‘investment’ in Māori-driven housing and urban solutions runs the risk of being tokenistic or disappointingly under-delivered.

Furthermore, truly supporting Māori and Iwi leadership may mean that individualised approaches to housing and urban development conventionally deemed satisfactory throughout Aotearoa New Zealand need to be re-thought. For example, “collectively-oriented interventions” (Lawson-Te Aho et al., 2019, p. 2) such as papakāinga and other shared or socially-based tenure options may be effective in addressing homelessness, but are rather difficult to realise and not well supported in the current regulatory environment (Berghan, 2020; Ruru, 2017). As a pivotal document and implementation tool at a critical time of growth and urbanisation in our country’s history, the GPS-HUD needs to set a high standard for prioritising and enabling Māori- and Iwi-driven solutions.

As such and in support of this focus area, we suggest the following modifications to the explanation of this focus area:

### *Invest in Māori-driven housing and urban solutions*

The right **and resources** to self-determine better housing and urban development solutions for iwi and Māori should be realised.

We have proposed actions for the Government and others to take to enable iwi and Māori-driven housing and urban solutions, **including papakāinga and other shared or socially-based tenure options across a range of scales.**

We would also like to see the following additions to actions proposed:

- Direct investment in resourcing Māori, local government and other relevant organisations to have the capacity to realise true partnership approaches that enable Māori-driven housing and urban solutions, **including** papakāinga and other shared or socially-based tenure options across a range of scales.
- Implement the MAIHI Partnership Programme to support iwi and Māori organisations to deliver housing projects that increase supply, prevent homelessness, and improve **both** tenure security and **tino rangatiratanga** for Māori.
- Government investment and support directed towards increasing iwi and Māori capability to provide housing solutions **that meet their needs and aspirations**, including via post-settlement entities.

### ***Prevent and reduce homelessness***

Homelessness is particularly damaging and prevalent for Māori, who “are four times more likely to be homeless than New Zealanders of European descent/Pākehā” (Lawson-Te Aho et al., 2019, p. 1; also see Amore, Viggers, & Howden-Chapman, 2021). This striking inequity in homelessness is explained by the “enduring effects” of a number of “interlinked inequities disproportionately affect[ing] Māori” stemming from “colonisation and historical trauma” (Lawson-Te Aho et al., 2019, p. 2). These effects span across health and housing, and are intertwined with insufficiently addressed root causes; including alienating policies, the predominance of Western legal systems, and a tendency toward individualised approaches. Māori- and Iwi-led solutions that support the exercise of tino rangatiratanga, and “collectively-oriented interventions” such as papakāinga should be prioritised and enabled by the New Zealand government, as they “are foundational and critical to solutions for Māori homelessness” (ibid., p. 2).

While we fully support this focus area, there must be explicit acknowledgement of homelessness inequities disproportionately affecting Māori. Furthermore, the New Zealand government has an obligation and opportunities “to respond to Māori homelessness in ways that strengthen and rebuild Māori collective cultural practices” (ibid., p. 7), such as with papakāinga. Papakāinga developments on tribal land initiated by Ngāi Tahu, for example, give first rights to their whanau (McLachlan, 2019) while also generating benefits that can be accessed by non-Ngāi Tahu “in a controlled way” (Lawson-Te Aho et al., 2019, p. 7). While such developments do not solve the homelessness crises completely and should not be used as an excuse for the government to neglect its “fiduciary duty towards those in need” (ibid., p. 7), they can play an essential role in preventing and reducing homelessness for multiple generations of Māori.

Another measure we would like to see taken is increased protection for tenants. The current policy is skewed to benefit landlords over tenants (Farha, 2021) and plays a role in contributing to homelessness.

Legislation is needed that prevents eviction into homelessness, strengthens the capacity of tenant protection associations, and changes how the Tenancy Tribunal operates so access to justice for tenants is easier and more balanced.

We would also like to underscore the key role that the GPS-HUD will play in the realisation of actual physical housing. In doing so, the GPS-HUD needs to not only align with, but genuinely support implementation of the Homelessness Action Plan (HAP) and Te Maihi o Te Whare Māori – Māori and iwi housing innovation framework for action (MAIHI). In particular, the aim of this alignment and implementation support should aim to ensure permanent and quality housing for all New Zealanders, and to support Māori- and Iwi-led solutions.

Therefore, we suggest the following revised wording to this focus area:

*Prevent and reduce homelessness*

Homelessness is rare, brief and non-recurring because people have access to **dignified, culturally responsive** housing, and to the support services that can work with people to resolve the health, financial, addiction and other social **or systemic** issues that place them at risk of becoming homeless.

We have proposed actions for the Government and others to take to support resilient, sustainable, inclusive and prosperous communities.

We would also like to see the following additions to actions proposed:

- **Encourage and fund further research to better understand the issues and opportunities associated with Māori- and Iwi-led solutions that support the exercise of tino rangatiratanga and collectively-oriented responses to homelessness (such as papakāinga).**
- **Minimise regulatory barriers that prevent Māori- and Iwi-led papakāinga development on tribal land.**
- **Overhaul current policy and introduce new legislation to help prevent homeless by increasing protection for tenants.**
- **Support implementation of the Homelessness Action Plan (HAP) and Te Maihi o Te Whare Māori – Māori and iwi housing innovation framework for action (MAIHI).**
- Support Māori community housing providers and other Māori and Iwi providers, and partner with them to prevent homelessness through kaupapa Māori initiatives **that support Māori- and Iwi-led solutions that support the exercise of tino rangatiratanga.**
- Continue to increase the supply of supported housing **with security of tenure** to reduce the use of emergency accommodation such as motels.
- provide more support for individuals, families and whānau experiencing homelessness to move into **housing with security of tenure** as quickly as possible, and to stay there to access wider social support agencies
- Undertake a suite of prevention actions to sustain tenancies, to expand and improve support and housing with security of tenure for young people leaving care, people **discharged** from acute mental health and addiction inpatient units, and people leaving prison or returned overseas offenders.

***Re-establish housing's primary role as a home rather than a financial asset***

We fully support this focus area, and we hope to see the government embrace alternatives to the conventional when trying to re-establish housing's primary role as a home. Above-mentioned "collectively-oriented interventions" (Lawson-Te Aho et al., 2019, p. 2) such as papakāinga and other shared or socially-based tenure options offer an important alternative to individualised, investor-driven approaches.

Another measure that could be helpful is to incentivise developers and collectives of property owners to invest in social housing, to relieve some of the rapid build pressure on Kāinga Ora.

Consideration of a capital gains tax or some other measure of calming unsustainable increases in the cost of home ownership should be revisited, albeit carefully so as to avoid potentially counterproductive increases to the rental market (Coleman, 2010).

Therefore, we suggest the following revised wording to this focus area:

*Re-establish housing's primary role as a home rather than a financial asset*

Reduce speculative investment in existing housing stock **and diversify tenure options**, making home ownership more accessible for first-home buyers, and supporting a more productive, resilient and inclusive economy.

We have proposed actions for the Government and others to take to reduce speculative investment **and diversify tenure options** in existing housing stock, making home ownership more accessible for first-home buyers, and supporting a more productive, resilient and inclusive economy.

We would also like to see the following additions to actions proposed:

- Continue to implement, **diversify** and refine new demand-side measures to limit speculative investment in existing residential property.
- Increase housing supply over time to dampen future expectations of high capital gain.
- Make new builds and associated markets more attractive to investors (for example, purpose-built rentals **or social housing**).
- Identify and remove barriers to other alternative tenures to outright home ownership (for example, shared ownership, **socially-based tenure**, rent to buy, or leasehold arrangements) that may also meet some people's needs.
- Introduce a capital gains tax or other effective measure of calming inflation so as to stabilise or lower the cost of home ownership.

***Implementing the GPS***

We support the proposed approach to implementing the GPS-HUD, but believe that more emphasis needs to be given to partnership with Māori to invest in, prioritise and help to enable Māori- and Iwi-driven solutions to housing and urban development challenges.

Furthermore and as noted above, the GPS-HUD's role is crucial in implementing the Homelessness Action Plan (HAP) and Te Maihi o Te Whare Māori – Māori and iwi housing innovation framework for action (MAIHI). The processes by which HAP and MAIHI are accessed and translated into actual physical housing need to be approached thoughtfully and with Māori as sovereign partners and decision makers. Only then can we hope to ensure permanent and quality housing for all New Zealanders, and to support Māori- and Iwi-led solutions to this housing.

### ***In conclusion***

On behalf of Public Housing and Urban Regeneration: Maximising Wellbeing (NZ Centre for Sustainable Cities | University of Otago, Wellington); Te Hotonga Hapori | Connecting Communities (AUT); Building Better Homes, and Towns and Cities National Science Challenge – Huritanga: Regenerative Urbanism Tools & Tactics for Holistic Urban Wellbeing; it is a privilege to make a submission on this important piece of work. We are delighted at the government's initiative to improve housing and urban development in Aotearoa New Zealand, particularly at this important time of growth and change. We hope that our submission encourages the government to go further and demonstrate commitment to understanding and prioritising the housing needs and aspirations of Māori, so as to better enable a future in which Māori and Pākehā collectively live in healthy, safe, secure, and affordable homes that meet their needs, within thriving, inclusive and sustainable communities.

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