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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)

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About the New Zealand Centre for Sustainable Cities

The New Zealand Centre for Sustainable Cities is an interdisciplinary research centre dedicated to providing the research base for innovative solutions to the economic, social, environmental and cultural challenges facing our urban centres. We undertake a range of research, published as journal articles, policy papers, working papers, and blogs, as well as making submissions from time to time to central government and councils on a range of issues relevant to cities, from climate change policy to compact urban development. See http://sustainablecities.org.nz/ and http://resilienturbanfutures.org.nz

Key points of this submission

We agree with the proposed vision of the GPS-HUD, but believe the outcomes and focus areas could and should go further. 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 explicitly stating across these commitment areas the need for increased supply and diversity of high-quality medium density housing models via compact, walkable development oriented around public transport; an area where significant improvement is needed to drive wellbeing and sustainable urban regeneration.***

As Aotearoa New Zealand grows, so too does the diversity of its inhabitants, their families and various needs; and so too should the diversity of options those inhabitants have for sustainably setting up their homes, getting to and from work, and being part of thriving, connected and inclusive place-based

communities. In particular, research indicates that there can be important sustainability, wellbeing and economic benefits associated with compact, walkable development providing high-quality medium density options – oriented around public transport – in-between low density single-family detached houses and high-density inner-city apartments (Chapman et al., 2017; Kearns, Witten, Kingham, & Banwell, 2017). Increasingly throughout the country, demand for medium density housing is strong and increasing (Opit, Witten, & Kearns, 2020; Page, 2017).

Individuals and families are seeking high-quality medium density housing options and walkable neighbourhoods well-connected through public transport that enable more sustainable lifestyles less reliant on the private vehicle (Howden-Chapman, Stuart, & Chapman, 2010; Witten, Abrahamse, & Stuart, 2011); that help minimise isolation and support greater individual wellbeing; and that support the kind of neighbourhood interaction, belonging and conviviality or friendliness that contribute to community formation (Kearns et al., 2017).

Aotearoa New Zealand is experiencing rising land prices, pressure on infrastructure, and declining availability of developable land; sustainable development models are essential (Page, 2017). One model that is helpful conceptually is the 20-minute neighbourhood, or neighbourhoods that are "accessible, safe and attractive local areas where people can access most of their everyday needs within a 20-minute walk, cycle or local public transport trip" (DELWP, 2017, p. 10).

Medium density housing – an essential aspect of realising the 20-minute neighbourhood – is increasingly recognised and sought after for its potential to deliver quality living experiences while avoiding sprawl, protecting valuable land and reducing or rationalising infrastructure demands. Yet there is a 'missing middle' set of medium density housing typologies in Aotearoa New Zealand, which should be acknowledged and explored. One of the most important aspects of medium density housing provision is getting the mix of typologies right to suit the needs of diverse demographic groups, and a greater range of models should be explored (Bryson & Allen, 2017).

Another important aspect of quality, sustainable neighbourhood development is the incorporation of comprehensive, easy-to-use recycling, composting and water systems. Such infrastructure should be part of the up-front planning and design of new neighbourhoods (Wennersten & Spitsyna, 2011), and should be incorporated a priority into existing, retrofitted and densifying neighbourhoods.

Overall, we need to approach housing and urban development in Aotearoa New Zealand with a comprehensive, long-term outlook that meets current needs, but equally – and perhaps more importantly – ensures the wellbeing of our people and the environment in 50-100 years and further into the future.

Comprehensively planned, high-quality compact development oriented around public transport that incorporates a range of medium density housing models with amenity and public service provision can contribute to wider social, economic, environmental and cultural wellbeing goals (Bay & Lehmann, 2017; Bryson & Allen, 2017; Güneralp, Reba, Hales, Wentz, & Seto, 2020; Mouratidis, 2018; Witten et al., 2011). Outlined below and structured according to the survey are key opportunities for the GPS-HUD to embed commitment to increasing supply, diversity and quality of medium density housing models via compact, walkable development.

Note: suggested wording changes to the GPS-HUD vision, outcomes, focus areas and actions are **bolded**.

The future we want to see

The vision of a future 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" is a good

one. However, we would like to see some changes made to the list of what this vision entails, so that it reads as follows.

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 medium density housing and compact, walkable development, given the sustainability, wellbeing and economic benefits that can be associated with it when done well. 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

Evidence suggests that while links between medium density living and community formation are not automatic and cannot be assumed, the 'human scale' and physical connectedness of medium density development can help to facilitate important dimensions to community formation. Thriving communities are formed through a combination of factors, including the following: 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. Such cooperative social relations that contribute to thriving communities are enhanced by neighbourhood settings that are compact and walkable within an accessible and relatable scale (Kearns et al., 2017).

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

Further to the above-mentioned social dynamics and to achieve wellbeing through housing requires attention to not only warm and dry construction quality (Curtis & Brunsdon, 2018), but also to delivering on the everyday lifestyle needs and aspirations of New Zealanders – including the young, the old, the marginalised, families, those living with disabilities, those on modest incomes, those with loved ones to support, etc. 20-minute neighbourhoods can help support "local living" for these diverse needs by offering a mix of uses, "a well-connected active travel network and a high-quality public realm with good access to employment, essential services, and community infrastructure" within an area of approximately 800 metres (Grodach, Kamruzzaman, & Harper, p. 9).

Medium density housing – an essential component of the 20-minute neighbourhood – encompasses a diverse range of housing typologies, so it is increasingly recognised as suitable for a diversity of people in various life stages with different housing needs and aspirations (Bryson & Allen, 2017). While the conventional preference for housing in Aotearoa New Zealand has been low density single-family detached houses (Dixon & Dupuis, 2003) and current housing supply is still predominantly catering to this (Bryson & Allen, 2017), demand for medium density housing organised around public transport has become strong and is increasing (Page, 2017). Individuals and families are seeking high-quality medium density housing options that enable more sustainable lifestyles less reliant on the private vehicle (Howden-Chapman et al., 2010; Witten et al., 2011); that help minimise isolation and support greater individual wellbeing; and that support the aforementioned social dynamics (Kearns et al., 2017). Importantly and in addition to other factors, wellbeing is interconnected with compact, walkable urban design that encourages active modes of transport (Chaix et al., 2013; Hinckson et al., 2017).

Furthermore, there is a 'missing middle' set of medium density housing typologies in Aotearoa New Zealand, which should be acknowledged and explored. While not always perceived positively, medium density housing is increasingly recognised and sought after for its potential to deliver quality living experiences while avoiding sprawl, protecting valuable land and reducing or rationalising infrastructure demands. One of the most important aspects of its provision, however, is getting the mix of typologies right to suit the needs of diverse demographic groups. Predominant models in Aotearoa New Zealand are 1-2-storey attached houses, 2-4-storey attached houses, and apartments (Bryson & Allen, 2017); yet a greater range of models exist elsewhere and should be considered in future developments (e.g., attached terraced (row) houses; mixed-use, low-rise apartments; courtyard housing; cooperative/collective housing, 'granny flat' placement, etc.) to help deliver on the needs of this country's diversifying demographics.

As such, we support the 'wellbeing through housing' outcome, but suggest the following re-wording to amplify and extend its purpose:

> All New Zealanders **– regardless of their demographic –** own or rent a home that is **high quality,** affordable, 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** 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 to be accessible, **functional and meaningful** regardless of ability, illness or age
- improved quality of existing housing and more homes built **using universal design standards** 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.
- people living in the homes and communities of their choice, including an increased range and quality of options being made available for medium density living

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). Additionally, the government needs to improve enabling of whānau support for intergenerational living in separate dwellings on a single title; doing so will also enable other communities to achieve housing solutions that support aging in place and extended-family living arrangements.

Therefore and as part of partnering for Māori housing and urban solutions, the GPS-HUD should aim to support and enable papakāinga or other shared and 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 revised wording in support of papakāinga or other shared and 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 or other shared and 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 form**
- 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
- enabling whānau support for intergenerational living in separate dwellings on a single title

An adaptive and responsive system

Not all growth is good growth. Sprawling growth that relies on consuming natural and productive land for urban development is unsustainable – environmentally, economically and socially (Bueno-Suárez & Coq-Huelva, 2020; Newman, Bachels, & Chapman, 2005). Aotearoa New Zealand is experiencing rising land prices, pressure on infrastructure, and declining availability of developable land (Page, 2017). Therefore, a long-term outlook is required to not only provide for growth in the foreseeable future, but also ensure that the wellbeing of our people and environment are prioritised through sustainable, compact, enduring development models.

As previously noted, high-quality compact development and medium density housing – together with active and public modes of transport – can deliver quality living experiences and deliver on wellbeing goals while avoiding sprawl, reducing car dependence, protecting valuable land and reducing or rationalising infrastructure demands (Bay & Lehmann, 2017; Bryson & Allen, 2017; Mouratidis, 2018; Witten et al., 2011).

Furthermore, the incorporation of comprehensive, easy-to-use recycling, composting and water systems are essential to being adaptive and response to climate change. Such infrastructure should be part of the up-front planning and design of new neighbourhoods (Wennersten & Spitsyna, 2011), and should be incorporated a priority into existing, retrofitted and densifying neighbourhoods.

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 with sustainable infrastructure**.

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 **a long-term outlook and 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

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 medium density housing and compact, walkable development oriented around public transport, given the sustainability, wellbeing and economic benefits that can be associated with such development when done well. 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
    - We suggest: **Ensure that affordable and liveable homes are available for all New Zealanders**
- Provide homes that meet people's needs
    - We suggest: **Provide a range of homes that meet people's diverse and changing 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

While it is sometimes necessary to free up more land for development, research strongly suggests that doing so should not be the first approach when seeking to provide quality, affordable housing (Güneralp et al., 2020). Compact, walkable neighbourhoods that are well-connected through public transport and feature high-quality medium density housing not only deliver quality living experiences and deliver on wellbeing goals while avoiding sprawl and protecting valuable land, they also reduce infrastructure

demands (Bryson & Allen, 2017) and support alternative, low-cost transport options (Howden-Chapman et al., 2010), increasing resilience .(Siri, Indvik, & O'Sullivan, (in press)).

Affordability may be fostered when building footprints are relatively small; infrastructure costs are less; and residents can access work, school, healthcare, community spaces and other core amenities without needing to rely on the car (Howden-Chapman, Early, & Ombler, 2017; Murphy, 2016; Witten & Carroll, 2011). Proactive, comprehensive planning and design can help to ensure that such affordability is achieved through new housing without compromising wider wellbeing or sustainability measures (Güneralp et al., 2020). Retrofitting lower density suburban neighbourhoods to increase walkability and density can also contribute meaningfully in this regard.

Furthermore, Aotearoa New Zealand needs urgently to improve the energy efficiency of its existing housing stock, which is amongst the worst in OECD. 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.

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 and neighbourhoods to achieve energy efficiency and equity at the same time as increasing walkability and density.**

Provide homes that meet people's needs

The demographics of Aotearoa New Zealand are changing and growing. Diversifying lifestyle needs and aspirations need to be met by the homes available for purchase or for rent. As previously noted, demand for medium density housing and compact neighbourhoods connected through public transport is strong and increasing throughout the country (Opit, Witten, et al., 2020; Page, 2017). Individuals and families are seeking high-quality, walkable options in-between the conventional low density single-family detached houses and high density inner-city apartments (Howden-Chapman et al., 2010; Witten et al., 2011), yet there is currently a 'missing middle' range of medium density housing typologies available in Aotearoa New Zealand.

One of the most important aspects of medium density housing provision – alongside public and active transport provision – is getting the mix of typologies right to suit the needs of diverse demographic groups, and a greater range of models need to be explored (Bryson & Allen, 2017).

This focus area also aligns with other cross-government work programmes including the [Building for Climate Change](#) programme; increasing the minimum energy performance of dwellings will be critical to help to reduce energy hardship (Howden-Chapman et al., 2009).

As such, 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 shared or community living.**

Support resilient, sustainable, inclusive and prosperous communities

While links between medium density living and community formation are not automatic and cannot be assumed, the 'human scale' and physical connectedness of medium density development can help to facilitate important dimensions to community formation (Kearns et al., 2017), and can also help create healthy urban living environments that enhance resilience (Siri et al., (in press)). Furthermore and while links can exist, no causal relationships should be assumed between building neighbourhoods, building housing and 'building' community (Filep & Thompson-Fawcett, 2020).

Rather and as the GPS-HUD wording suggests, communities can be 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 in Aotearoa New Zealand: (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 M*āori* 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

As previously mentioned with regard to the 'partnering for Māori housing and urban solutions' outcome, papakāinga is an important housing model to mana whenua and Māori. Furthermore and 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 investing in Māori-driven housing and urban solutions, the GPS-HUD should aim to support and enable papakāinga or shared and socially-based tenure options across a range of scales, including those which might provide further options in the medium density range.

As such, we suggest only a slight modification to the explanation of this focus area:

> *Invest in Māori-driven housing and urban solutions*
>
> The right 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 or shared and socially-based tenure options across a range of scales**.

We would also like to see the following actions proposed:

- **Direct investment in resourcing Māori and local government to have the capacity to realise true partnership approaches that enable Māori-driven housing and urban solutions, including papakāinga or shared and socially-based tenure options across a range of scales.**

Prevent and reduce homelessness

We fully support this focus area, but there needs to be more acknowledgement of homelessness being 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).

The government has an obligation and opportunities "to respond to Māori homelessness in ways that strengthen and rebuild Māori collective cultural practices" (Lawson-Te Aho et al., 2019, p. 7), such as with papakāinga. While papakāinga 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.

The government should also increase protection and security 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.

Furthermore, research shows that transitional housing is a model that fails many people who are homeless and have complex support needs when they leave in-patient services or prisons. The government needs to prioritise housing and security of tenure, and not rely on 'transitional housing' as an adequate solution in-and-of-itself.

The GPS-HUD will play a key role in the realisation of actual physical housing. As such, 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 with **security of tenure**, 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. "Collectively-oriented interventions" (Lawson-Te Aho et al., 2019, p. 2) such as papakāinga or shared and other 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 to stabilise or lower the cost of home ownership.

Implementing the GPS

We support the proposed approach to implementing the GPS-HUD, but believe the way that government proposes to work with regard to 'place-based approaches' should be expanded. While it is true that there

is no one-size-fits-all solution for housing and urban development (Filep & Thompson-Fawcett, 2020; Howden-Chapman et al., 2017), there is significant value in comparative studies and learning from what has worked in other places (Robinson, 2016). Some of the solutions found to work in Auckland may not directly translate to Wellington, Christchurch or Dunedin, but some aspects of those solutions could.

Moreover and as Aotearoa New Zealand is still a relatively young nation compared with others around the world, it has the advantage (if open and willing) to learn from what has proven successful or challenging elsewhere. Particularly on this topic and as previously noted, there are a range of 'missing middle' typologies of medium density housing – such as attached terraced (row) houses; mixed-use, low-rise apartments; courtyard housing; and cooperative/collective housing – that are largely missing from the Aotearoa New Zealand context (Bryson & Allen, 2017). We cannot know whether or not such typologies would be successful here unless we are willing to expand our approach and try them.

Given the lingering scepticism of medium density development in Aotearoa New Zealand despite its documented potential – when comprehensively planned, oriented around public transport and delivered to a high quality – to contribute to wider social, economic, environmental and cultural wellbeing goals (Bay & Lehmann, 2017; Bryson & Allen, 2017; Güneralp et al., 2020; Mouratidis, 2018; Witten et al., 2011), there is value in expanding the possibility of medium density environments that New Zealanders are able to experience and evaluate.

In conclusion

Thank you for the opportunity 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 be even bolder when it comes to taking a long-term adaptive and response view; expanding sustainable approaches to urban intensification; and improving not only the supply, but also the quality and range of housing options – oriented around public transport and sustainable infrastructure – available to New Zealanders, now and into the future.

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