

Feedback on the Ministry of Housing and Urban Development's Long-term Insights Briefing proposed focus: *the long-term implications of our ageing population on the future of housing and urban development in Aotearoa New Zealand.*

12 November 2021

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## RE: Long-term Insights Briefing [LtIB] proposed approach

### Introduction

Thank you for the opportunity to provide feedback on your Long-term Insights Briefing proposed focus: *the long-term implications of our ageing population on the future of housing and urban development in Aotearoa New Zealand.* We hope to support HUD in direct collaboration in the development of the LtIB over the coming months.

1. Community Housing Aotearoa-Ngā Wharerau o Aotearoa (CHA) is an Incorporated Society and a peak body for the community housing sector. To achieve our vision of 'all New Zealanders well-housed', we have a strategic focus on supporting a well-functioning housing system and working toward the realisation of the right to housing. We are also mindful of the larger institutional and regulatory settings within which our members and other community organisations operate. We are keen to ensure these settings support the delivery of homes affordable to households of varying income levels.
2. Our 75 provider members provide homes for nearly 30,000 kiwis nationally across 18,520 homes, and our 30 partner members include developers, consultants, and local councils. Community Housing Providers (CHPs) are primarily not for dividend entities that develop, own, and manage social and affordable housing stock, with rental and progressive homeownership tenure offerings. We work closely with Te Matapihi, which represents Iwi-based and Māori community housing providers. More about us can be found [here](#).

### We support HUD in exploring this subject matter and delivering its LtIB

3. We are very pleased to see the Ministry embarking on the process of developing its Long-term Insights Briefing at this time. More importantly though, we look forward to working more closely than ever on the on-going development of this important and ground-breaking report. We wish to be closely involved and we have experienced staff with a great deal to offer this process. We also have a network of members, other social service organisations and researchers with specific experience and expertise we can access.

4. We support the proposed focus for the Long-term Insights Briefing [LtIB], and we understand the drivers for landing on this approach. That said, this feedback also raises a range of additional issues for consideration.
5. The GPS-HUD states that it was developed with input from organisations and individuals from communities across the country, iwi and Māori and from central and local government, and that it built consensus on the housing and urban outcomes that New Zealanders want. As a major piece of policy work following closely on the heels of the GPS-HUD, we would anticipate that the LtIB should set out to closely align with the GPS, and contribute to putting it into practice.

*Is the proposed topic, the long-term implications of our ageing population on the future of housing and urban development in Aotearoa New Zealand, a valuable issue to consider?*

6. As noted, Community Housing Aotearoa support the proposed focus. We see that there is potential for this focus area to surface critical issues and pose many important questions relating to housing and urban development, as is discussed in this section.
7. As a fore-note we agree the impacts of climate change, the need to address those impacts urgently and equitably, and building the best insights we can into what those impacts will be, are critical themes that flow through this feedback and should flow through the LtIB itself.

*Universal design and housing typology needs*

8. Housing for seniors in New Zealand appears at first blush to require non-market solutions – solutions that are genuinely different to market operation. This is the case in other segments too, especially rental housing. It will also be critical to understand how housing typology can be planned and modified from today into the future, to prepare for the aging population.
9. Universal design implemented comprehensively today is a perhaps our most powerful tool in preparing for the wellbeing of an aging population: the key message being that universal design must be embedded in the Building Act.

*Rights in housing and urban development as a framework for change*

10. In this section we are suggesting our housing system should be underpinned by values and rights, not politics. Those values will take the housing kaupapa beyond questions of supply and typology, and toward understanding what New Zealanders want older people to be able to look forward to. The GPS-HUD infers a desire to understand better what implementing human rights and the right to housing will look like. It looks like a system driven by values and rights, in which politics of the day are moulded by those values and rights.
11. In this system, the human right to adequate housing is used as a basic framework to ascertain what is truly fundamental to meet everyone's needs, including recognition that real accountability, and access to real justice for New Zealanders experiencing housing hardship, needs to be part of the system. The LtIB context offers a new frame through which *progressive realisation* of the right could be plotted.

12. Specifically, the Long-term briefing needs to recognize all the rights in the housing and urban space which New Zealanders should be enjoying: affordability, accessibility, security of tenure, location, cultural adequacy, availability of infrastructure, and habitability, alongside access to justice and real accountability when their rights and needs are not met, and more generally participation in decision making.<sup>1</sup> It is insufficient to simply increase the supply of affordable homes reserved for seniors, if those homes are not universally designed so they can be enjoyed by the whole whānau or if they are located so as to cause social isolation and an inaccessibility of vital services.
13. A human rights approach includes reference to and implementation of the rights of indigenous peoples. That set of rights includes [among other things] the recognition of the right to self-determination, as well as requiring respect for and fulfilment of any treaties or other agreements reached with indigenous populations. In this context, reference to human rights therefore promotes the on-going development of the Crown-Māori relationship based on Te Tiriti, as well as serving as an independent driver of self-determination.

#### *Rental system*

14. Evaluating how our rental system works for older tenants is critical. Is it secure enough, are the quality standards high enough, are the rent mechanisms robust enough, is Superannuation sufficient? Or do we just not expect older people to be renting? If in fact we do not expect older New Zealanders to be renting, what is it that we do expect and what do we need to do to enable that?
15. We are also aware that there is a growing wave of rangatahi homelessness. We know homeless adults in New Zealand are very likely to have been homeless as young adults. Far from sitting at opposite ends of a linear timeline, the LtIB could consider the ways in which these groups are deeply connected.
16. It is easy to imagine a teenager being unable to pay rent for example, perhaps because they are not yet in work or earn a very low income. What is it we are imagining about seniors who are in precarious housing situations – in regard to affordability, or tenure, or habitability, and perhaps scared to ask for or seek help? Either way secure housing is characterised not as a right but as a privilege exclusively benefitting only some New Zealanders.

#### *How the Government works, acts, and operates*

17. We have compiled a number of proposed ideas and enquiries relating to how Government should work, act, and operate in relation to housing.
  - a. planning to ensure we maintain and ensure provision of adequate and appropriate social infrastructure;
  - b. how to proactively recognise the cultural challenge inherent in a disproportionately large Pākehā aging population needing to be supported in retirement by an increasingly Māori workforce;
  - c. how we can best enable aging in place in rural areas and mid-sized regional towns by ensuring equitable access to health and other services, and ensuring through urban development planning the provision of a modified set of social infrastructure appropriate for a structural level of demographic change in communities;

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<sup>1</sup> United Nations, Factsheet #21.

- d. how do we enable communities and providers, and public actors, to support the transition of older people from what were family homes into warmer, more secure, and connected properties while also planning for a workforce able to support the demographic shift to an older population;
- e. reflection on the ways in which employment practice and culture has evolved during COVID-19 and how much of this change will be embedded in the future of work: what impact will this have on the meaning of community, place, location, and adequacy;
- f. reflection on the system wide impact of changing demand for and availability of materials for housing and urban development activities.

*Enabling new affordable supply of housing in the system, and for seniors*

- 18. Our conversations on this topic have identified the simple and clear need for affordable retirement village options and an adequate provision and supply of other affordable options. While there are some organisations in this segment, the market more broadly is currently not providing affordable options. Also, the Consultation Document considers the importance of key workers in the ancillary (and often poorly remunerated) job force associated with aging populations but fails to pay sufficient credence to where they will live. An increasing impetus on providing affordable senior housing options also should feature a parallel supply of affordable housing for those who assist and support seniors in their golden years.
- 19. At the heart of the current crisis, we consider that it is critical to actively surface through the LtIB the need to resolve uncertainty in the underlying tacit agreement between central and local government in relation to housing for seniors. The widely understood tacit agreement between central and local government has been allowed to break down and council housing provision has slowed, declined, and/or maintenance has become an issue. The decline in 'council housing' has not been met by an increase in central government funded housing for the same cohort, leading to today's crisis, and tomorrow's catastrophe.

## Our concerns about this proposed focus

### The purpose of the Long-term Briefing tool

- 20. While we support the proposed focus of the Ministry's LtIB, we consider that it risks underplaying the potential of the new tool. For example, if we view the LtIB as a chance to ask what the global future trends are, what their likely impact on our housing and urban development systems could be, and how we should respond in the next 10 years, we think it likely that new or other topics and focus areas would be difficult to ignore.
- 21. We are concerned that the long-term implications of our ageing population on the future of housing and urban development is actually a current critical priority for Ministerial and Cabinet consideration and for immediate policy work and action. Seniors are experiencing housing hardship today and there is no substantive solution on the table, which we can all agree is a threat to many of our cultural foundations. We therefore encourage HUD to address this concern directly in the framing of the document.

### An ethnic and cultural imbalance in the foundations of the seniors housing issue

22. There are important cultural and ethnic dimensions to this choice of focus area. As is set out in the engagement material it is well known that the aging population is disproportionately of Pākehā ethnicity, and also more generally disproportionately non-Māori. What's more, the proportionately younger Māori population will make up more of the workforce paying tax to support any increase in provision for that older population. This appears on its face inequitable and perhaps unconscionable unless done through a frame of increasing equity.
23. Anecdotal, criticism has been raised over recent years that mainstream concern over home ownership rates dropping has only truly emerged once that trend started to effect the Pākehā population – meaning that sub-par and declining rates of home ownership among Māori and Pasifika whanau was well documented, but garnered little political or media attention prior to the issue being one confronting Pākehā. We draw your attention to this crisis of conscience which resides in this choice of focus area.
24. For example, we suggest the LtIB should elaborate on how government will assist iwi, hapū, and whānau to renovate existing papakāinga to be accessible for seniors.

### Our approach to the housing system today is a direct influence on the future of seniors housing

25. Affordable housing and affordability are critical concerns. As our population ages what will continually come into focus is that most people and households who have rented for long periods will not only retire without home ownership, but without substantial savings. This is because today our rental market is not being regulated in ways that protect security of tenure and rent levels that provide for genuine affordability. Security of tenure alongside affordable rents/affordability would create conditions for increased savings among renters. What is being gained today by landlords is being taken from the capacity of renters to save. This needs to change, today, and the Government has the regulatory tools to do that.
26. The failure of the Accommodation Supplement to generate new supply has demonstrated that increasing untied housing-related benefits will not substantively mitigate housing affordability stress nor increase affordability. Consequently, the LtIB needs to consider a reworking of the Superannuation *and* devise means of bringing on new affordable supply in a manner which emphasizes quality, accessibility, and human rights.
27. Recent changes to the Residential Tenancies Act have demonstrated the Government's renewed emphasis on increasing security of tenure and the habitability of rental homes. However, for older tenants these changes may not go far enough. Having a sense of tenure security in one's rental property, feeling mutual respect between landlord and tenant, and the responsiveness of landlords to maintenance requests are outlined by BBHTC as being central to productive relationships between landlords and senior tenants.<sup>2</sup> Work on the LtIB should emphasise how Government will legislate and work with the for-profit rental market to increase security of tenure especially among seniors for whom stability and continuity is paramount. This should consider ways in which senior tenants could be empowered by

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<sup>2</sup> James, Bev. *Ageing in Place as an Older Tenant: Independence and Uncertainty*. 2020

Government (both legislatively and financially) to make changes to rental properties that will increase their accessibility.

28. It is clear to us that a holistic cross-agency approach is needed to enable all seniors to have access to the support services necessary for them spend their retired years living in dignity. Superannuation increases, the extension of health services, infrastructure and public transport spending, and a supply of truly affordable homes for the elderly with bespoke wrap-around services are just some of the constituent pieces required to support our seniors. The Seniors' Long-term Insights Briefing needs to elaborate on how it will work across the various responsible ministries to achieve these measures.
29. Our support for this approach ultimately comes down to the fact that through the lens of senior housing we can approach many of the critical long-term systemic risks and challenges we face in housing: inadequate housing, expensive housing, isolated housing, ineffective planning, poor quality rental housing, extremely insecure tenure experienced in our rental system, the increasing risks and harm associated with financialisation and under-pace supply.
30. If we can indeed approach these issues we would suggest that a well-crafted LtIB will in fact help HUD, CHA and all those working in the sector to move toward our shared vision for all New Zealanders to be well-housed within a great housing system.

Community Housing Aotearoa reiterates our support for the HUD to undertake this work and our interest in working closely with you to develop the briefing. While the opinions offered herein are those of Community Housing Aotearoa, we acknowledge the input from and the endorsement of this feedback by Abbeyfield New Zealand, Marlborough Sustainable Housing Trust and Presbyterian Support New Zealand.

Vic Crockford, Chief Executive Officer

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