

# Draft Government Policy Statement on Housing and Urban Development 2025

Consultation Questionnaire

August 2025



# Introduction

# What is the Government Policy Statement on Housing and Urban Development (GPS-HUD)?

The Government Policy Statement on Housing and Urban Development (GPS-HUD) states the government's overall direction and priorities for housing and urban development. It informs and guides the decisions and actions of agencies involved in housing and urban development and sets out how government and others will work together to make this happen, and shape future government policy, investment and programmes of work. The first GPS-HUD was published in 2021.

#### **GPS-HUD review**

The Ministers of Housing and Finance are required to review the GPS-HUD every three years. Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (the Ministry) leads the review.

In section 24 of the Kāinga Ora–Homes and Communities Act 2019, it says:

24. Preparation or review of GPS

When preparing or reviewing a GPS, the Ministers must-

- a. be satisfied that the GPS promotes a housing and urban development system that contributes to the current and future well-being of New Zealanders; and
- consult Kāinga Ora–Homes and Communities and persons, and representative group of persons, who have an interest in housing and urban development in New Zealand.

#### See section 24 of the Kāinga Ora–Homes and Communities Act 2019

The proposed draft GPS-HUD includes the Māori and Iwi Housing Innovation (MAIHI) approach. This was done to strengthen and provide greater protection and government accountability for the MAIHI approach, make the system strategic approach clearer, more coherent and easier to manage, and more clearly show the relationship between Māori housing initiatives and government priorities.

# Providing feedback on the proposed GPS-HUD

We want your feedback on how well the proposed draft GPS-HUD 2025 presents a multi-decade system strategy for housing and urban development, and places current work programmes in the context of what needs to be done to achieve the desired outcomes.

We recommend that you read the draft GPS-HUD before you complete the survey: Draft GPS-HUD 2025.

You may also wish to refer to the previous GPS-HUD 2021 to see changes made: GPS-HUD 2021.

Once you are ready to provide your feedback, you can make a submission via this online survey: Consultation Form.

Alternatively, you can fill out a copy of this document and send us your submission by email to hud gps@hud.govt.nz.

#### **Disclaimer**

We will include a summary of submissions in recommendations to ministers and Cabinet, which may be proactively released. This will include a summary of submitters' views and may include the names of individuals or organisations that have made submissions. The Privacy Act 2020 establishes certain principles with respect to the collection, use and disclosure of information about individuals.

Any personal information you supply to us while making a submission will only be used for the purpose of assisting in the development of the final GPS-HUD. If you do not wish for your name, or any other personal information, to be included in the summary of submissions, please email us at <a href="https://example.com/hud.govt.nz">https://example.com/hud.govt.nz</a>.

Submissions may be requested under the Official Information Act 1982. If you have any objection to the release of the information contained in your submission, please email us at hud <a href="mailto:qps@hud.govt.nz">qps@hud.govt.nz</a>.

Please set out clearly which parts you consider should be withheld, together with the reasons for withholding the information. We will take such objections into account and will consult with submitters when responding to requests under the Official Information Act.

# Overview of the GPS-HUD 2025

The GPS-HUD sets out the government's long-term direction for housing and urban development, alongside five priority actions aimed at establishing the foundations of a more adaptive, responsive system that enables growth while supporting those in greatest need.

The priorities include supporting housing growth, reforming the resource management system, resetting investment to better support those most in need, improving efficiency and competition in building and construction, and strengthening rental markets.

The updated GPS-HUD reflects the current government's priorities and is intended to guide the housing and urban development system towards more equitable and effective outcomes.

For the first time, the GPS-HUD will incorporate the MAIHI (Māori and Iwi Housing Innovation) approach, recognising that Māori housing solutions are integral to the broader housing system.

# Changes made to the GPS-HUD during our review

The strategic framework for the GPS-HUD 2025 has been updated from GPS-HUD 2021 to incorporate and highlight five key government housing and urban development priorities. Other adjustments have been made to reflect the current context.

Roles and expectations of key government agencies have been integrated into each priority.

The 'focus areas' from the GPS-HUD 2021 are no longer their own category. While not all of these are highlighted in the government priorities directly, we expect that all of them will be impacted over time by this work. For example, addressing housing supply and housing need will have flow-on effects on housing quality and homelessness.

Changes have also been made to streamline and shorten the document to make it more readable and accessible.

We are looking for your feedback on these changes.

# The future we want to see – outcomes

The GPS-HUD 2021 has four outcomes for the housing and urban development system to help achieve its vision. The outcomes for housing and urban development are long term, so the outcomes outlined in the GPS-HUD 2021 have been largely retained in the GPS-HUD 2025. There have been some updates to the wording for the current context.

See page 7-8 of the consultation document.

# Outcome: an adaptive and responsive system

The label of this outcome statement is unchanged, but the description has been updated for the current context (see page 7).

We've done this to show how this outcome applies across all facets of the system including urban development, housing supply and social housing.

# **Proposed GPS-HUD 2025 text**

A housing and urban development system that is integrated, self-adjusting and delivers in response to emerging challenges and opportunities.

Land, infrastructure, development and construction markets that are responsive to demand, well-planned and well-regulated.

Place-based investment, with central and local government working with partners in places to identify and deliver the best mix of public and private initiatives and services.

Decision-making supported by excellent evidence and data.

#### **Questions**

Do you think this outcome statement adequately describes what an adaptive and responsive system looks like?

Yes / No / Unsure / No preference

[If no] How can we better describe what an adaptive and responsive system looks like?

CHA supports the outcome statement for a housing and urban development system that is adaptive and responsive for Aotearoa New Zealand. We believe this ought to be underpinned by equity, an enabling legislative framework, data driven housing policy and sustainable finance settings informed by Māori, local authorities, the community housing sector and the wider building and development industry.

We believe a well-functioning housing system is also characterised by integrating quality, innovation and transformational change to achieve better housing outcomes and improve wellbeing outcomes for lower income families. We believe there is an on-going, significant role for government to ensure the outcomes are achieved. We believe that the design of the system must incorporate several features described below which are likely to be embedded in the new resource management legislation.

An adaptive system requires clear end goals and interim milestones which are measurable. This is underpinned by evidence and data which is consistently collected and reported. We are concerned these features are currently lacking and

may become less available without Census data. An area of particular concern is the ability to measure Severe Housing Deprivation. The existing Housing and Urban Development Indicators maintained and published by HUD have significant gaps, as noted on the website since adoption. Data reported should be able to be disaggregated to understand who is, and is not, being well served. At a baseline, this should include age, gender, ethnicity and disability

Some of the data currently available goes back to the 2018 Census and only a few indicators across the entire set have been updated to 2024. The last System Update was issued for the period to 30 June 2023. It would be good to have the GPS set targets for filling those gaps and ensuring consistent reporting.

We support a place-based focus for investment to identify and deliver the best mix of public and private services. These must include measuring affordability based on local incomes and housing costs. These also need to be available across all council areas rather than a limited set of priority areas which receive funding whilst others are excluded.

New infrastructure funding and finance tools are needed by local councils to spread costs over the useful life of the assets developed. Value capture tools should be enabled in legislation to make sure that these public investments are not captured for private gain. Other tools to ensure serviced land is timely developed are also needed to deter land banking or other actions which drive up the cost of housing. These tools include targeted rates and new powers to remove private covenants which undermine delivery of the typologies and price points meeting local needs.

# Outcome: stable, affordable, healthy homes

The label of this outcome has changed from 'Wellbeing through housing' to 'stable, affordable, healthy homes' (see page 7).

The descriptive text has been updated to fit the current context, while being more specific about the outcomes we want to see.

# Proposed GPS-HUD 2025 text

Housing that is affordable and has stability of tenure, whether it's rented or owned.

People able to choose where they live and what type of home they live in.

People with enough money left over after housing costs for other things they need.

The quality, accessibility, size and features of homes support people and families to be healthy and productive.

People in greatest housing need get the support they need, and homelessness is rare, brief and non-recurring.

#### Questions

Do you think this outcome statement adequately describes what stable, affordable, healthy homes look like?

Yes / No / Unsure / No preference

[If no] How can we better describe what stable, affordable, healthy homes look like?

CHA believes that the Government should adopt a definition of "affordable housing" and without it the outcome statement is insufficient. The lack of definition creates confusion and allows the term to be co-opted by entities offering housing which may be affordable relative to market, but not truly affordable relative to incomes. CHA's preference is that the term "Affordable Housing" is defined as housing where costs do not exceed approximately 30% of the household's gross income.

An ideal affordability state for Aotearoa would be where median weekly housing costs to buy or rent in an area do not exceed 30% of the median household weekly income and below market rentals are available for those on lower incomes. This will enable whānau to affordably realise their housing aspirations. Whilst longer term system settings drive toward this as a normal result, substantial investment into Community Housing Providers, Iwi and Māori Housing Providers, and Kāinga

Ora will be required in the short and medium term. This investment should be into providers who retain and recycle the public investment long term.

Our current housing system is not delivering the types of homes people need to be healthy and productive. This is well documented in numerous reports (see response to "Resetting investment to help those most in need" below). The failures of the system include the lack of: accessible homes; smaller homes for the increasing number of single person and couples-only households; larger homes suitable for inter-generational living; independent living options for persons with disabilities; and affordable homes. We recommend that Housing Needs Assessments are required to understand how many homes are needed, at what prices points and typologies, and what social infrastructure may be required to serve the near- and long-term needs of the community.

# Outcome: Māori housing through partnership

The label of this outcome statement is unchanged, but the descriptive text has been updated for the current context (see page 7).

# Proposed GPS-HUD 2025 text

Māori and the Crown working together in partnership to ensure all whānau have stable, affordable, healthy homes.

Māori housing solutions led by Māori and delivered locally, with Māori able to utilise their own assets and whenua.

Active Māori participation in the system through partnership with the Crown to invest in and support housing solutions.

#### Questions

Do you think this outcome statement adequately describes what Māori housing through partnership looks like?

Yes / No / Unsure / No preference

[If no] How can we better describe what Māori housing through partnership looks like?

We defer to the submission by Te Matapihi regarding the specifics of Māori housing delivery through partnerships. Specifically, we endorse Te Matapihi's call for binding, enforceable commitments to Māori-led housing solutions.

In addition, we add the comments below.

We agree that the sentiments in the outcome statement mean well. However, we continue to emphasise the need for the practical application of this outcome to ensure active and informed Māori engagement while also honouring Te Tiriti throughout the process, leading towards better housing outcomes for all Māori. We support Māori-led housing solutions delivered by Māori in an active partnership with the Crown. We believe this can only be achieved through a co-creation process led by Māori to define their needs and how the Crown can partner with them for mutually beneficial outcomes.

The MAIHI framework can serve as a guiding approach to support meaningful partnerships with Māori and to shape the overall direction of the GPS-HUD. It is important that MAIHI is not subsumed within the GPS-HUD. For MAIHI to be actioned, it must carry decision-making power within the GPS.

Māori housing through partnerships can be informed by the findings and recommendations from various state inquiries including:

Wai 2700 – Mana Wāhine Kaupapa Inquiry

- Wai 2750 Waitangi Tribunal Housing Policy and Services Kaupapa Inquiry on Māori Homelessness
- Whanaketia Abuse in State Care Inquiry

# **Outcome: thriving and resilient communities**

The label of this outcome statement is unchanged, but the descriptive text has been streamlined and updated for the current context. (see page 8)

# **Proposed GPS-HUD 2025 text**

Development aimed at creating towns and cities that have abundant housing and well-functioning physical and community infrastructure.

Transport that gets people where they need to go quickly and efficiently.

Towns and cities that are resilient to natural hazards, help reduce emissions and adapt to the impacts of a changing climate.

Communities that drive economic growth and support businesses to grow.

#### Questions

Do you think this outcome statement adequately describes what thriving and resilient communities look like?

Yes / No / Unsure / No preference

[If no] How can we better describe what thriving and resilient communities look like?

We support the general statements on thriving and resilient communities. Taken alongside the other outcome statements they point to a better future. A concern we have is that the document is not clear on the steps to be taken, especially regarding how climate adaptation will be planned and implemented.

The consultation document (page 33) refers to a NIWA study identifying more than 400,000 residential building at risk of flooding. This is nearly 20% of all private dwellings according to the 2023 Census. While an emphasis on growth is necessary, we must also plan for retreat from some areas and responses to hazard events which are increasing in frequency. There are significant challenges to be addressed as the cost of maintaining infrastructure in known hazard areas becomes unsustainable. We need to plan for how communities impacted will be assisted to safer areas and how the costs will be allocated amongst central and local government and communities and whānau. This reality must be factored into the new resource management system and our overall housing policy planning.

# **Government priorities**

The Government's five housing and urban development priorities provide a basis for action to set the conditions that will enable housing growth, enable the market to achieve housing and development outcomes, and meet the needs of the most vulnerable people. They are:

- Going for Housing Growth
- reforming the resource management system
- resetting investment to help those most in need
- improving efficiency and competition in building and construction
- improving rental markets.

Each priority has a set of objectives and achievable initiatives designed to accelerate progress towards the long-term GPS-HUD outcomes.

Under the heading for each priority is a table that shows how the priority contributes to the GPS-HUD outcomes. For example, Going for Housing Growth contributes to the outcomes adaptive and responsive system, stable, affordable and healthy homes, and thriving and resilient communities.

We are seeking your feedback on whether the GPS clearly shows how each priority contributes to the outcomes.

See pages 9–21

#### Questions

Does the GPS-HUD clearly describe how these Government priorities contribute to the long-term outcomes:

Going for Housing Growth?

Yes / No / Unsure / No preference

We note that the Government is undertaking a wide ranging and ambitious number of activities to improve housing and urban development. As details on some of these have not yet been announced, we are unsure whether the actual changes will result in the desire long-term outcomes. We are supportive of the direction of travel and are committed to working with Government to achieve the outcomes.

Expectations from the consultation draft we feel are important to better understand include:

- How will Government enable territorial authorities and infrastructure providers to recover capital expenditure costs from developments?
- How will Government provide for landowners who benefit from major infrastructure investments contribute funding towards them? Will value capture mechanisms be enabled for local authorities?
- What further mechanisms will be enabled at regional and local levels?
- For the "consideration" of potential incentives for councils to enable more housing what are these, have they already been considered, what can be implemented now?

We provided detailed feedback in our submission on Going for Housing Growth. Here is a link to that submission: <a href="https://communityhousing.org.nz/gfhg-discussion-paper-cha-submission-2">https://communityhousing.org.nz/gfhg-discussion-paper-cha-submission-2</a>

# Reforming the resource management system?

# Yes / No / Unsure / No preference

CHA believes that the new resource management system needs to provide good environmental, social and economic outcomes for all New Zealanders. This means that hazards must be mitigated, culture must be respected, and a range of home typologies and prices must be delivered, not just theoretically enabled, to meet the diverse needs of people and communities. A key lever to enable this is value capture and inclusionary housing which local authorities would like to implement but are hesitant due to the lack of clear enabling legislation.

Another key is ensuring that development of whenua Māori is broadly and consistently enabled across local authority areas. We agree with Te Matapihi that mandatory national direction for papakāinga is essential, as discretionary, or inconsistent council rules have constrained whānau, hapū and iwi for too long.

We provided detailed feedback on the new resource management proposals in our submission on Going for Housing Growth. Here is a link to that submission: https://communityhousing.org.nz/gfhg-discussion-paper-cha-submission-2

#### Resetting investment to help those most in need?

#### Yes / No / Unsure / No preference

Housing is a human right and setting the conditions to meet those needs is not limited to those subjectively categorised as 'most in need'. We believe that limiting investment to 'those most in need' is inherently flawed and reinforces the residualisation of essential support and stigmatisation of lower income whānau, especially those who are experiencing homelessness.

We support the actions to reduce reliance on emergency housing and believe this is best accomplished through the medium term by Transitional Housing

programmes. We also support examining the Income-Related Rent Subsidy and Accommodation Supplement settings to achieve better outcomes. Permanently affordable long term rentals are an identified solution for lower income households.

We note the statement (page 19) that government needs to grow its understanding of the needs of "Māori, Pacific peoples, young people, older people and disabled people". Substantial research has already been done to grow our understanding of the housing needs and potential solutions for all these groups. Below are some good examples of work by HUD and other agencies that have adopted strategies or completed research on how to meet these needs including:

- MAIHI Ka Ora / National Māori Housing Strategy (HUD)
- Kāinga Ora Māori Strategy 2021-2026 (KO)
- Fale mo Aiga / Pacific Housing Strategy 2030 (MPP, KO and HUD)
- Pacific housing: People, place, and wellbeing in Aotearoa New Zealand (Stats NZ)
- New Zealand Disability Strategy 2026-2030 (Whaikaha consultation draft)
- Better Later Life He Oranga Kaumātua 2019-2034 (Office for Seniors)
- Review of Retirement Income Policies 2022 (Te Ara Ahunga / Retirement Commission)
- Child and Youth Strategy 2024-24 (MSD)

Action is now required to adequately resource responses identified in these strategy documents and in abundant research completed by the Aging Well and Building Better Homes, Towns and Cities National Science Challenges along with BRANZ research. We and our members are ready to engage with government to support better alignment of research/knowledge and investment decisions signalled through the Flexi-Fund.

We support the proposed Flexi-Fund approach to rationalise funding and make it easier to provide multi-tenure developments. Ensuring adequate, on-going funding will be critical to its success. Reimagining the Accommodation Supplement from a demand side subsidy to a supply side investment could contribute to success as can value capture mechanisms including inclusionary housing.

Improving efficiency and competition in building and construction?

#### Yes / No / Unsure / No preference

We support improving efficiency and competition in building in construction. Community housing providers will benefit from this with lower costs to develop new affordable homes. Overall system improvements may help to slow the rise in costs and related home prices.

We have concerns about proposal to enable trusted builders to sign off on their own consents. Significant safeguards will be needed to enable this without shifting risk to local authorities or home buyers. We believe a good deal of the risk aversion of local authorities to new building products/systems is a result of the liability they incurred from leaky homes. It will be important to set robust and

enduring defects liability insurance requirements for builders enabled to sign on off their own work.

### Improving rental markets?

#### Yes / No / Unsure / No preference

We believe there are additional opportunities to improve rental housing. The review of the Accommodation Supplement mentioned in a prior section could be an element of a new investment strategy. Transitioning the over \$2 billion annual spend from a demand side subsidy to a supply side investment building retained affordable homes can deliver an expanding pool of below-market rental homes. Community, Māori and local authority providers can own and manage these homes for long-term community benefit. We support encouragement of Build-to-Rent homes that are professionally managed with guardrails to ensure local ownership.

Regarding legislation and regulation, we do not support the restoration of 90-day 'no cause' evictions. This directly contradicts the statement in the consultation document that "Insecure housing is linked to negative mental and physical health, education and employment outcomes and can have significant impacts on renters, particularly older people, young single people, disabled people and families". We cannot reconcile the disconnect between the evidence and the action taken. We are unaware of evidence demonstrating rental supply dropped when 'no cause' evictions were disallowed nor that supply has subsequently increased upon restoration from 30 January 2025.

A light touch regulatory regime for residential property managers was previously introduced, with the legislation consulted upon and receiving industry acceptance from the New Zealand Property Investors Federation. We continue to support sensible regulation of residential property managers as outlined in our submissions in April 2022, October 2023 and oral testimony to the Select Committee in February 2024. We are encouraged that the government is now reconsidering this topic which was abandoned in June 2024.

We also support finalising the stalled regulations for methamphetamine contamination. Our members are facing significant costs and on-going legal uncertainty due to the lack of action since public consultation in 2022 and 2023. We hope these regulations are urgently progressed rather than the next three to five year timeframe set in the consultation document.

How could the GPS-HUD better describe how the Government priorities contribute to the long-term outcomes?

The GPS-HUD could better describe how the Government priorities contribute to the long-term outcomes by including measurable indicators of those outcomes and short to medium term targets for them. For example, the Minister of Housing has stated that he would like to see the median multiple of incomes to home prices reducing over time. Putting specific targets for that reduction at say three year intervals would enable monitoring, reviews and adjustments if the targets are not on track. As described above, the data collected must be able to differentiate

outcomes for various subgroups to enable reporting by age, gender, ethnicity and disability. The housing and urban development system is complex and subject to various external factors not directly in the Government's control. When those negatively impact on achieving the outcomes, it will be necessary to make adjustments to get back on track.

Māori housing through partnership – the MAIHI approach

The MAIHI (Māori and Iwi Housing Innovation) approach was developed by Māori and the Crown. The MAIHI vision is that "all whānau have safe, healthy, affordable homes with secure tenure, across the Māori housing continuum".

MAIHI aims to better position the system to deliver an equitable approach to housing. Tailored Māori housing solutions are delivered alongside the wider housing and urban development efforts being undertaken across the country.

MAIHI breaks the actions needed to address Māori housing challenges into six key priority areas:

- Māori-Crown partnerships
- Māori-led local solutions.
- Māori housing supply
- Māori housing support
- Māori housing system
- Māori housing sustainability.

These MAIHI priorities are set out in the consultation document, together with current Government actions to improve housing outcomes for Māori.

See pages 22-24

#### Questions

Does the GPS-HUD sufficiently incorporate the MAIHI priorities?

Yes / No / Unsure / No preference

[If no] How could the MAIHI priorities be better incorporated in the GPS?

We defer to the submission by Te Matapihi regarding the extent to which the GPS-HUD sufficiently incorporates the MAIHI priorities and the following questions on MAIHI. Specifically, we endorse Te Matapihi's call for MAIHI to carry decision-making power within the GPS-HUD, rather than just be referenced. In addition, we endorse Te Matapihi's call for binding, enforceable commitments to Māori-led housing solutions.

In addition, we add the comments below.

CHA is supportive of the integration of MAIHI with the GPS-HUD. However, we caution that the approach must intentionally weave and underscore MAIHI rather than it being absorbed and potentially devalued. CHA believes the MAIHI framework can be a key decision-making tool, not simply a tokenistic gesture to be referenced throughout the GPS-HUD. MAIHI was designed to elevate Māori voices

in housing, but without meaningful decision-making consequences, this runs the risk of MAIHI becoming symbolic.

We support Te Matapihi's call for MAIHI to hold actual decision-making power, to shift the approach from simple consultation towards more meaningful cogovernance, where Māori are not just heard but lead the conversations about housing and urban development.

Co-governance means Māori have equal input into how funding is allocated, how success is measured and how accountability is enforced. It moves away from the idea that Māori are recipients of Crown-defined metrics.

Does the GPS-HUD clearly link current Government actions to improve Māori housing outcomes and the MAIHI priorities?

Yes / No / Unsure / No preference

[if no] How could the GPS-HUD more clearly link the current Government actions to improve Māori housing outcomes and the MAIHI priorities?

We believe integration with Wai 2700, Wai 2750 and Whanaketia findings are important to linking and clarifying current Government actions to improve Māori housing outcomes and MAIHI priorities.

We join Te Matapihi in our call for greater integration of research and inquiry that has already been done as it will inform decision-making and ensure the Crown refrains from cherry-picking reforms or ignoring historical grievances that have been documented. This is about binding commitments, not optional gestures at the discretion of the Crown and its agencies.

Does the GPS-HUD clearly reflect Māori housing interests and aspirations?

Yes / No / Unsure / No preference

[if no] How could the GPS-HUD better reflect Māori housing interests and aspirations?

Papakāinga and Māori-led housing should be a national priority and outlined more clearly in the GPS-HUD to better reflect Māori housing interests and aspirations. We push for enforceable national direction that prioritises Māori-led housing models like papakāinga. Legislative and policy mandates that embed Māori housing solutions into the national framework are welcomed and could be better reflected through the GPS-HUD.

# Working together to deliver change

Government plays a key role in housing and urban development, by supporting private and community sectors, and delivering change itself where there are gaps others in the system cannot fill.

The GPS-HUD includes a description of the roles of government agencies, including the Ministry and Kāinga Ora, and how they are expected to contribute to the achievement of housing and urban development outcomes. The GPS-HUD also describes the roles of players outside government who government needs to partner and collaborate with to help achieve outcomes for the system.

See pages 25-27

#### Questions

Does the GPS-HUD clearly describe the role of government in the housing and urban development system?

Yes / No / Unsure / No preference

[if no] How could this be more clearly described?

The Government has the responsibility for ensuring a well-functioning housing system meeting the needs of all people under human rights obligations and in particular for Māori through Te Tiriti o Waitangi. Through hearings at the Waitangi Tribunal (WAI 2750) the Crown has acknowledged its failure to fulfil its housing obligations. In addition, both the New Zealand Human Rights Commission and the UN Special Rapporteur for Housing have identified shortcomings in meeting the Right to a Decent Home. The Government has the opportunity set the conditions to improve the legal and operational framework of the system to ensure everyone has a place to live they can afford. This update to the GPS is a step in that direction.

A well-functioning housing system is not a 'nice to have'; it is a fundamental base for better health and educational outcomes and economic performance. It must be a priority across all government agencies and requires a long-term plan and funding strategy. We believe that this GPS needs to be supplemented with detailed action plans to achieve each of the stated outcomes. These could be consolidated into a National Housing Strategy providing clear responsibilities, targets, timelines and investment signals. This would more clearly describe the role of government in the housing and urban development system.

Does the GPS-HUD clearly describe the role of HUD in the housing and urban development system?

Yes / No / Unsure / No preference

[if no] How could this be more clearly described?

HUD is clearly tasked with leading the system and has a clear purpose statement. It is unclear on their ability to hold other system players to account and make adjustments when desired outcomes aren't achieved. For example, Ministers responsible for Kāinga Ora have significant control over that entity which has a large impact on the delivery of public housing. Our members tells us the lack of physical and mental health supports along with AOD services are significant barriers to addressing homelessness. HUD's ability to influence or direct the delivery of coordinated services outside of its Vote Housing budget is limited. This is one example of how the current system is driving up costs to government in both health and housing that would benefit from a clear National Housing Strategy.

As discussed above under regulatory and legislative settings, there are areas where despite its good work to consult and develop regulations or legislation, follow through by Parliament has held up progress. Working in a cross-party to identify key areas of agreement and embed these into a National Housing Strategy would provide more certainty to HUD in carrying out its important roles.

Does the GPS-HUD clearly describe the role of Kāinga Ora in the housing and urban development system?

Yes / No / Unsure / No preference

[if no] How could this be more clearly described?

Kāinga Ora is largely absent from the discussion document. We assume that the current 'reset' plan and related Statement of Performance Expectations lay out their future role. A focus on renewing their portfolio is warranted, but must be adequately resourced and supported. Their future engagement in large-scale urban development has been effectively ended, so that is a gap that is currently not addressed. How does government intend to undertake large-scale urban regeneration and infrastructure provision for our aging urban areas? We previously submitted that local authorities could be empowered to undertake this as is common internationally. We believe more local involvement as signalled through the place-based approach is consistent with empowering local authorities to take a greater role.

Does the GPS-HUD clearly describe how the Government expects Kāinga Ora to manage its functions and operations to meet the government's directions and priorities?

Yes / No / Unsure / No preference

[if no] How could this be more clearly described?

From the information released describing the 'reset' of Kāinga Ora and the Statement of Performance Expectations, it appears they are set to focus on maintaining their existing portfolio levels whilst upgrading and regenerating stock rather than increasing provision. With a growing and aging population, this means that others will need to step up to deliver more and meet changing needs.

Currently, the GPS-HUD does not clearly state the desired balance between Kāinga Ora, private, local authority and community housing provision to meet current and projected needs.

Does the GPS-HUD clearly describe how Māori and iwi are involved in the housing and urban development system?

Yes / No / Unsure / No preference

[if no] How could this be more clearly described?

Again, we emphasise the need for a focus on co-governance across the housing and urban development system. As currently described, the GPS-HUD does not go far enough to explain the important role that Māori, iwi and hapū have.

The GPS-HUD could make a commitment to explore co-governance so that the role of Māori can be understood as having equal input into how funding is allocated, how success is measured and how accountability is enforced. In doing so, Te Tiriti becomes central to the housing system and the role of Māori is shifted from simply being seen as recipients of Crown-defined metrics.

Does the GPS-HUD clearly describe who government needs to partner and collaborate with to deliver on its priorities?

Yes / No / Unsure / No preference

[if no] How could they be more clearly described?

Whilst the GPS-HUD provides a list of partners and collaborators including Māori/iwi, CHPs, social sector, local government and the private sector, it is unclear about the mechanisms and tools which will be utilised to achieve the desired outcomes. What will Government bring to the partnership? What are the partners expected to bring? How will any gaps be identified and addressed?

Clarity and consistency is required to activate the long-term partnerships which can deliver the desired outcome. We especially wish to emphasise the importance of role clarity. Role clarity is the most significant critical success factor when working in collaborations and partnerships. As the community sector we are very clear about the role we play. We expect the Government to be very specific and clear about the role it sees itself playing in this context too.

# About the GPS-HUD as a whole

The GPS-HUD has been revised to reflect key changes in government's focus and approach.

Changes have also been made to streamline and shorten the document to improve readability.

#### Questions

Do you have any other comments, suggestions or changes for the GPS-HUD?

Community Housing Aotearoa formally acknowledges the influential submissions for Te Matapihi, The Coalition to End Women's Homelessness and Housing First Auckland. Each reinforces and complements the stance advanced in this submission, collectively strengthening the sector's unified call for urgent, binding change. We also wish to acknowledge the many members and partners who have contributed input to our submission.

We encourage HUD to engage with us and the many other submitters committed to improving housing outcomes in partnership with Government. We are supportive of the direction of travel, but feel greater urgency and resourcing is required.

We wish to reaffirm the importance of engaging with Māori to develop solutions that are led by Māori in partnership with the Crown. MAIHI needs to carry decision-making authority (not be just a component of the GPS-HUD) with funding, accountability and monitoring mechanisms which are co-governed with Māori.

We also wish to reiterate the need to include measurable milestones and overall goals for each of the outcomes. Without this there is no ability to understand our progress, what is working well and what needs more attention. This relies on the timeliness and quality of data, which we feel are currently lacking and may be further negatively impacted by the end of the Census.

# **Privacy statement**

Providing this information is optional. We collect this information from you to understand whether we heard from different types of stakeholders during our consultation.

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong.

If you'd like to ask for a copy of your information, or to have it corrected, please contact us by:

- email <a href="mailto:hud\_gps@hud.govt.nz">hud\_gps@hud.govt.nz</a>
- freephone 0800 646 483
- post to Te Tūāpapa Kura Kāinga Ministry of Housing and Urban Development, PO Box 82, Wellington 6140.

#### Questions

Are you submitting on behalf of yourself or an organisation?

Individual / Organisation

[if organisation] What type of organisation are you submitting on behalf of?

Iwi/Māori / Central government / Local government / Private sector / CHP / Social sector / Advocacy group / Academic / Other

[if organisation] What region(s) does your organisation cover? (multichoice)

Nationwide / Northland / Auckland / Waikato / Bay of Plenty / Gisborne / Hawke's Bay / Taranaki / Manawatū-Whanganui / Wellington / Nelson / Tasman / Marlborough / West Coast / Canterbury / Otago / Southland

[if organisation] What is your organisation, group or ropū name?

Community Housing Aoteaora, Nga Wharerau o Aotearoa

[optional] What is your name?

Chris Glaudel, Deputy CE

Ngā mihi nui!

Thank you for your submission!