

KĀINGA STRATEGIC ACTION PLAN

A plan to improve housing outcomes for Māori in Tāmaki Makaurau

Kāinga Ora-Homes and Communities Bill: summary of submissions

SUMMARY OF SUBMISSIONS

What?

The Kāinga Ora-Homes and Communities Bill was introduced to Parliament in May 2019 and submissions opened in June following the first reading.

Over 90 submissions on the bill were made to the Environment Select Committee from a wide range of organisations and individuals, representing a broad range of perspectives. There is a great deal of support for the bill in the submissions, albeit expressed with many qualifying concerns.

This document is not intended to provide a comprehensive summary, but to highlight the breadth of views available for review on the submissions website.

Why?

The submissions read together offer a window on what New Zealanders think about the contents of the bill and the particular way it proposes to establish an Urban Development Authority. Perhaps more importantly and interestingly, the submissions also frequently go beyond the contents and purpose of the bill, and naturally explore broader issues in housing in New Zealand. In fact, on reading through a reasonable number it became clear that if you were interested in finding out what the key issues in housing in New Zealand are right now, the collective submissions on the Kāinga Ora bill would be a really good starting point.

This summary sets out to achieve the simple purpose of any summary: to represent key points and the flavour of the material, to share those key points in a way that is easy to consume, while also inviting you to go further and read the source material itself. This summary groups submissions together under sectors or sub-sectors (Te Matapihi and other rōpū Māori; CHA and community housing providers; LGNZ, SOLGM, and Local Government along with DHBs [as these are all geographic]; and other submissions) and content is attributed to the organisation so that the full text can be easily found on the alphabetically arranged select committee [webpage](#).

What's next?

The Environment Select Committee has now reported to Parliament and the bill has progressed through the second and third reading, and received Royal Assent on 23 September 2019. The [select committee's report](#) is of great interest as it represents the degree to which our collective submissions were responded to in their advice to Ministers.

On 24 September a series of Ministry of Housing and Urban Development papers and a letter from the Legislation Design and Advisory Committee were also made public as part of the select committee process:

- [Officials' Report](#) to the Environment Committee - August 2019
- Kāinga Ora—Homes and Communities Bill - [Initial Briefing](#) presentation

- [Initial Briefing](#)
- Letter from the [Legislation Design and Advisory Committee](#)
- The Ministry of Housing and Urban Development – [Response to Queries](#) from the Environment Select Committee
- The Ministry of Housing and Urban Development – Response to Queries from the Environment Select Committee on [22 August 2019](#)

These additional papers provide a significant look into the ‘back-catalogue’ of Ministry thinking and communication with the Ministers and the committee, and as such on-going analysis will help us to understand the positions and aspirations of those close to the process.

All of this has occurred within a vacuum in the sense that a further bill is expected later this year which will seek to establish any special powers Kāinga Ora will have. Those powers are required - for example - in determining how Kāinga Ora developments will be consented, and how Kāinga Ora will *in law* achieve the aggregation of land which is at the heart of the Urban Development Authority activity in other jurisdictions.

This second bill is likely to create more tension in the sector at large than this bill has, in fact many submissions to a large extent defer their principle comment for the second ‘powers’ bill, or at least note that it is somewhat complicated to comment on a bill that establishes functions and operating principles without setting out what powers may be utilised in implementation.

Regardless, what we are seeking is change. A change in the outcomes we see and experience in communities, driven in theory at least through policy, process, practice, and strategy changes resulting from this further significant structural change in government and other ‘moving parts’.

There should be plenty to explore at Auckland Māori Housing Summit 2020 in March next year.

Notes on this summary:

- Entries in this document are abridged from the actual submissions available publicly on the parliament website. The summary does not include content from all submissions, and the summary is not intended to reflect every issue or point raised in any submission.
- Except where indicated by brackets or other means the text is not modified from the original submission, although many sentences and paragraphs have been truncated.
- A number of submissions oppose the bill – generally outright opposition - on grounds that either the bill:
 - is racist in allegedly privileging Māori or involves the government failing to treat citizens equally;
 - that it includes too much te Reo Māori;
 - by specifying for engagement (etc) with Māori, Māori will have (e.g.) *disproportionate influence*; or
 - by specifying for partnership (etc) with Māori, (e.g.) a ‘Māori elite’ will benefit disproportionately.
 ➤ This summary attempts to identify leading housing and urban development policy issues raised by the bill and what has been said about those issues in our collective submissions. In general the above-mentioned set of opposing submissions did not address leading housing policy issues. One or two instances are included, but generally these submissions were excluded for that reason.

TE MATAPIHI AND OTHER RŌPŪ MĀORI

Te Matapihi he Tirohanga mō te Iwi Trust

Te Matapihi acknowledges the proposed name of the bill and new urban development authority contain the Māori term ‘Kāinga ora’.

The concept of kāinga is central to Māori identity, society and culture – it refers to something more than a home, village or community and must be understood alongside other concepts, such as ahi kā (home fire symbolising the right to occupy the land), ūkaipō (the home that sustains us), mana whenua (the intrinsic spirit of the land and associated rights that govern human interaction with it), kaitiakitanga and whakapapa.

Māori were guaranteed “te tino rangatiratanga o ratou... kainga” (the ‘highest chieftainship’ of their kāinga) under the Treaty of Waitangi.

[We] emphasise that [‘kāinga’] must be understood in its customary sense, as that is how Māori will interpret it. [Kāinga] should not be borrowed as convenient and popular terms to convey a non-Māori concept, but rather should express a genuine commitment to achieving the aspiration of ‘kāinga ora’ in a Treaty partnership with Māori.

Te Matapihi supports Section 4: Māori Interests, and related sections, which:

- Ensure that “Kāinga Ora–Homes and Communities has the capability and capacity to uphold the Treaty of Waitangi (Te Tiriti o Waitangi) and its principles...
- Provide for Kāinga Ora “to understand, support, and enable the aspirations of Māori in relation to urban development”.
- Require Kāinga Ora to identify and protect “Māori interests in land” and provide for “the relationship of Māori and their culture and traditions with their ancestral lands...”
- Require Kāinga Ora to partner and have “early and meaningful engagement with Māori” and offer “Māori opportunities to participate in urban development”.
- Protect Treaty settlement rights of first refusal.

[T]here is also a need to strengthen the capacity and capability within the Māori housing sector, to grow housing related expertise and to grow Māori providers of housing services of scale. Kāinga Ora – Homes and Communities will have an important role in nurturing such capacity and capability.

Māori outcomes are not always addressed through ‘mainstream’ policies or initiatives, and Māori providers are often not on a level footing to compete. [There] is an onus to provide specifically for Māori aspirations by way of bespoke housing strategies, initiatives and procurement processes.

The housing system within government is undergoing significant change and remains a challenge for external groups. [We] have long advocated for a clear ‘point of entry’ for Māori into the system.

It will be important that there are seamless connections between all points within the system, including Kāinga Ora – Homes and Communities, and that Māori interests with the most diverse of needs and in the most remote locations are accommodated.

We note the proposed function of Kāinga Ora – Homes and Communities: “to make loans for housing purposes, to administer programmes for financial assistance for home ownership, and to give other financial assistance relating to housing.”

Access to finance is a major impediment to Māori housing outcomes, particularly home ownership and papakāinga housing development on Māori land. A national wānanga in 2018 on pathways for financing papakāinga, the following themes emerged:

- Crown direct lending
- Crown guarantees
- Progressive ownership

The Māori Housing Act 1935 enables the chief executive of the Ministry of Māori Development to make advances for the purpose of providing dwellings or improved housing conditions for Māori.

However there has been no appropriation for some time that enables advances to be made. Kāinga Ora – Homes and Communities will be constrained in its ability to exercise this particular function if no appropriation is made for such purposes. However, this is also an exciting possibility...

The Māori housing sector has suffered from the lack of a clear national Māori housing strategy that identifies key approaches towards addressing Māori outcomes. Ideally, the GPS will work in conjunction with such a strategy to influence system response to priority Māori housing outcomes.

[T]o effectively identify Māori interests, the GPS must be developed in partnership with Māori.

Hāpai Te Hauora

[In addressing the social and housing challenges for Māori, it is imperative that Te Āo Māori be the source of knowledge that informs all decision-making processes.](#)

Hāpai supports the vision that whānau do not reside in houses, but live in homes, that whānau do not just live on a street, but actually live in a neighbourhood and do not just exist in a civic space, but thrive in communities.

Hāpai is committed to realising the health and well-being potential of Māori communities through working towards equitable health outcomes for whānau, hapū and iwi. We affirm that to achieve this the impacts of broader social determinants of health need to be addressed, including housing.

We recognise the upstream, macro level determinants of health, such as housing, education, and employment, and the impacts that these have on the everyday lives of New Zealanders. This echoes the empirical evidence provided by Te Ao Māori worldviews, and reiterates the need for comprehensive and cohesive cross-sector approaches to provide for a future –proofed [system].

Māori continue to experience long-term social impacts ... of the misappropriation of natural resources by colonialization, the trauma of land dispossession, loss of economic resources, and wider impacts of colonisation on community, whānau, place, language, education, health and culture (Menzies, 2018).

[Whilst cultural understanding is critical to inform the process of building better homes for Māori that fulfil the dynamic needs of whānau \(Menzies, 2018\), it is of higher importance that ‘For Māori, by Māori’ approaches be embedded in the values and practise of Kāinga Ora, with a partnership framework instituted to reflect true treaty partnership.](#)

We do however, seek to address the robustness of the recognition of Māori interests, and challenge the intent of merging the private and public sectors.

We advocate that Kāinga Ora be obligated to uphold the treaty principle of partnership, by being legislatively bound to the compulsory appointment of two Māori individuals to the Board.

We recommend that “recognising Māori interests” is not limited to ‘Māori partnership and engagement’. Instead, Te Ao Māori & mātauranga Māori should fundamentally inform the nature of co-design and collaboration...

Traditional Māori communal constructs already have the blueprint for developing sustainable and connected communities.

Hāpai is concerned at a fundamental level, HLC in that that they do not prioritise iwi, mana whenua or Māori interests. [T]he reality is that it will be near impossible for this entity to dissociate itself from its current commitment to an economic bottom line in the first instance.

Independent Māori Statutory Board

Housing is a critical issue for Māori in Tāmaki Makaurau. The Independent Māori Statutory Board recognises the important role an Urban Development Authority will play in addressing those issues. Kāinga Ora has promise and potential to respond to Māori housing issues highlighted in the 'housing stocktake' report commissioned by the Minister of Housing and Urban Development in 2017:

“We must acknowledge the harsh effects the housing crisis has had on Māori. They have borne the brunt of rapidly rising house prices and skyrocketing rents. A crucial part of Government policy must help more Māori into their own homes...” (HON PHIL TWYFORD, February 2018 (p2).)

Kāinga Ora is an opportunity to deliver improved housing and urban outcomes and embed the Treaty of Waitangi and its principles and kaupapa Māori and Māori values in approaches to housing.

The UDA and its structure should:

- I. Enable secure future partnership opportunities for Māori in public sector housing development
- II. Achieve a meaningful aggregation of government housing functions
- III. Demonstrate public sector innovation/leadership on implementing the Treaty of Waitangi;
 - a. Implement co-governance to ensure Māori/Crown partnership in decision-making
 - b. Ensure senior leadership have obligations to deliver Māori outcomes
- IV. Drive significantly improved housing outcomes for Māori through:
 - a. A clear and direct statement of the UDA operating as the primary near-future tool for achieving compliance with human rights obligations
 - b. Sector and systemic change
 - c. Enhanced commitment to Māori outcomes through targeted and mainstream programmes
 - d. Recognition of the critical nature of housing ... in emotional wellbeing and in cultural experiences of home, kāinga, whānau, and a window through which the world is experienced.

[P]artnership in development is dominated by financial priorities and the management of development risk, as well as being characterised as operating in a competitive environment.

[We] differentiate this class of partnership from partnership in accordance with the Treaty of Waitangi which ... requires ... more than financial investment and carries burdens and opportunities greater than financial risk or windfall. [Treaty partnership] remains an under-developed area.

Co-governance is a means and model of decision-making partnership that will only thrive through legislative direction. The bill falls short of utilising this relatively recent governance innovation.

For New Zealand to have transparent insight into any public housing deficit [and] understand New Zealand's compliance with the Treaty and human rights obligations, it will be necessary for New Zealand's public housing tenancy manager ... to be able to assess and report on that deficit.

Transparency in this area is... critical in meeting demands for Māori outcomes expressed in community as well as cabinet papers, delegations such as those of Associate Minister Mahuta, and strategic documents such as the strategic intentions of the Min. of Housing and Urban Development.

A great deal of legislation since 1985 in particular, includes [clear and direct obligations flowing from and relating to the Treaty of Waitangi, falling on ascertainable persons and positions of sufficient standing to ensure those obligations are met and/or liability is transparent, within the scope of the Act. For example, section 4 of the Conservation Act.](#) The Kāinga Ora-Homes Communities Bill does not include [such] a statement.

Māori are seeking increased Treaty compliance from the government in relation to housing, and this requires transparency around roles and responsibilities. [S]ignificant shifts in [public sector]

practice... signalled across cabinet papers and other documents, should find their clearest and most explicit expression in the most binding and deliberate documents of government.

Marutūāhu Rōpū Limited Partnership

Clause 11, while well intentioned, does not ensure Kainga Ora–Homes and Communities acts in a Treaty compliant manner:

- A Crown requirement to ‘maintain systems and processes’ to ensure the Board has the ‘capability and capacity’ to uphold the Treaty of Waitangi and its principles falls short of ensuring the Crown’s Treaty settlement obligations and commitments are met.
- There is nothing to prevent Kainga Ora–Homes and Communities, as a new statutory entity independent of the Crown, from asserting its obligations to meet the Crown's commitments are limited by its parent statute.
- Rights of first refusal are not the only Treaty obligations that the Crown has committed to in the settlement of historical claims, nor the only ones at issue in [this bill].

Tamaki Legal

The claimants we represent acknowledge and welcome the provision for greater recognition of Māori housing interests in the Bill and the provision for greater recognition of Te Tiriti o Waitangi.

The claimants are not convinced that ensuring that Kāinga Ora-Homes and Communities (“Kainga Ora”) “has the capability and capacity to . . . uphold the Treaty of Waitangi (Te Tiriti o Waitangi) and its principles” is the same as actually upholding Te Tiriti o Waitangi and its principles.

A preferred formulation of clause 11(1) would be: Additional collective duties of board

(1) The Board must ensure that Kāinga Ora-Homes and Communities, –

- (a) acts in a manner consistent with the operation principles in section 14;
- (b) upholds the Treaty of Waitangi (Te Tiriti o Waitangi) and its principles;
- (c) understands and applies Te Ture Whenua Māori Act 1993; and
- (d) engages with Māori and understand perspectives of Māori.

COMMUNITY HOUSING AOTEAROA AND OTHER PROVIDERS

“CHPs ... offer a robust, flexible, low risk approach to the delivery of new public housing supply.”

Community Housing Aotearoa

To achieve the Bill’s ambitious objectives, both Kāinga Ora – Homes and Communities as a new delivery agency and the GPS would be strengthened by giving effect to:

- (i) A human rights-based approach guided by a clear rights-based housing strategy¹;
- (ii) the provision of housing across the housing affordability continuum;
- (iii) delivery through a diverse range of organisations including locally based iwi, hapu; Pacifica organisations; and Registered Community Housing Providers
- (iv) decision-making involving communities, including specific place-based approaches by enabling local housing policies, strategies and documents;
- (v) A vision for all actors in the housing and urban system in New Zealand, not just

Government's role in it.

Community housing sector providers are some of the partners that government seeks for delivering the aims of the Bill. CHPs have exceeded our 'public housing' delivery targets, delivering 600 of the 1600 new public houses annually, above the 30% target set by the previous Housing Minister.

CHA's submission has two key elements:

- (i) How Kāinga Ora – Homes and Communities will act as an urban development agency. Many of our members are not-for-profit housing developers with a long-term interest in the communities we invest in, responsible for land development and the construction of homes and communities. Our interest is in understanding how they can partner with Kāinga Ora.
- (ii) regarding the GPS, to offer suggestions so that it provides guidance for the whole housing system, not just Government's role, and moves toward the right to housing in New Zealand.

We support the ambition for legislation recognising the need for building institutions that can act, and deliver on our diverse housing needs.

We accept the need for a special-purpose UDA capable of tackling large-scale urban development projects, however we are of the view that the landlord function should and must remain separate from the entity tasked with delivering the large, complex urban development projects.

Quality tenancy and asset management are a function in their own right requiring a different approach and culture than delivering large-scale urban regeneration. We have concerns that the focus on providing effective tenancy and property management will be subsumed.

We support the use of a Government Policy Statement (GPS), yet encourage this to be linked to and informed by a far more aspirational New Zealand Housing Strategy informed by the guidance from the UN Special Rapporteur on Housing applying to the overall housing and urban system.

This legislation is a once in a generation chance to get it right, we ask that you think more broadly in how the GPS can make explicit the right to housing in practical and tangible ways, then follow that with connected strategy, funding and planning decisions. We are looking for legislation that delivers adaptability and resilience into a well-functioning housing system.

We sought advice on whether this legislation is likely to achieve its aims, and move our country towards a well-functioning housing system, and what our sector's role should be in that system. [T]he GPS should explicitly affirm roles and responsibilities for CHPs, just as it does for the state.

We remain committed to being a true partner with Government in the delivery of a broad range of housing supply, housing solutions, place-based community development and support services. We have complimentary, spare capacity that can work in parallel with Government delivery.

Kāinga Ora – Homes and Communities will be working well, when it is able to invest in growing existing Community Housing Provider-led solutions, already active in a given place.

CHPs, with community organisations, faith groups, whanau, hapū and iwi ... hold a social license to operate in the delivery of sustainable, inclusive and thriving community outcomes.

[Suggested amendments are] offered with the spirit of ensuring that the taxpayer gets best value for investment, by activating the underutilized capacity in the Community Housing Sector, rather than seek to build new capacity within Government.

There is a risk that achieving mixed, connected, affordable housing developments could be compromised if too much focus is given to other potential housing and urban development outcomes – for example the provision of infrastructure or commercial and industrial developments.

[A]ffordable housing developed should remain so, so that mixed housing and communities are maintained. The structure of CHPs ... ensures the retention of affordability for the long term.

For more comprehensive housing outcomes to be achieved, these will need to occur through locally driven partnerships and decision-making processes with Kāinga Ora. The Community Housing Sector has demonstrated that it is able to do this more effectively and with better results than any other private or government agency.

We don't agree with the presumption that all of HNZA should be disestablished and placed inside Kāinga Ora. We preferred Option 2 – Multiple UDA's set out on page 33 of the Regulatory Impact Statement. This is because as a country, we need a wide range of high-performing housing providers, not a single large state landlord. HNZA should be encouraged to be one of many housing providers participating in a Kāinga Ora development, not the only one.

[T]he fundamental structure of community housing to be working with communities, and blending philanthropic, public and private finance for a wide range of housing and community development outcomes. This is a wider ambit than 'public housing'.

[T]his Bill is a good opportunity to make explicit a parallel track for the growth of Registered CHPS. Doing so would demonstrate that the partnership intent becomes real.

The IMSB's work on the Kāinga Strategic Action Plan explicitly calls for 'a Māori housing provider of scale in Auckland' among its recommendations, and we hope the Bill would give effect to this plan.

[The GPS] should recognise housing as a human right. The GPS will then ... make it clearer what such a right to housing means so as to operationalise it, and by extension develop accountability for it.

Our suggested changes intend to ensure that the Bill is interpreted and administered as to give effect to the principles of the Treaty of Waitangi and ... to the human right to adequate housing.

How housing is framed and discussed is important... it is recommended that the human right to housing is more explicitly noted within the Government Policy Statement clauses.

We believe that the GPS should illustrate the wider roles across a housing system. The bill should not advance without explicitly clarifying the scope of the GPS in relation to the whole housing system.

We suggest that the GPS needs to make explicit the Local Council roles in working with Registered Community Housing Providers, as well as fostering Inclusionary Zoning.

Language supporting Inclusionary Zoning approaches would assist the CHP sector and local government in delivering a greater share of mixed income, mixed tenure communities, and would provide a parallel delivery system for smaller and medium size, less complex developments ... [not] requiring UDA powers. We have recommended text for inclusion in section 24(1) of the GPS, using the broader terminology of value capture, uplift, retention of affordable housing and recycling of value for current and future generations.

[The CHP] sector in New Zealand is growing but still remains very small relative to other developed economies where very substantial contributions, outputs and outcomes are consistently delivered.

If Kāinga Ora can recognise and activate CHP capability here, it will release Government capacity to focus on other more pressing matters where it can add greater value. Kāinga Ora is an opportunity to address the massive housing affordability gap that is damaging many communities across the country. The Intermediate Market, those +/- 200,000 working households across New Zealand who cannot afford to rent or buy a home at approximately 30% of their total combined gross household income, have very few choices or affordable housing options.

Auckland Community Housing Providers Network

We note with interest references ... to greater partnership and collaboration. We welcome this, as it has not typified our experience ... to date. We remain committed to being a true partner to the New Zealand Government in the delivery of a broad range of housing supply, housing solutions, place based community development and support services. We have complementary additional underutilised spare capacity to support Kāinga Ora-Homes.

[Regarding] clause 13 ... the agencies of the State need not do all of this work themselves and there are other partners wanting to [be] more significant providers of solutions alongside Crown agencies.

Community Housing Providers have a history of innovation and a social licence to operate in the delivery of sustainable, inclusive, and thriving community outcomes that has been proven over time.

[I]t would not always be the best use of public money to invest in ... new capacity within Government agencies when that same capacity and capability and experience already exists and is underutilised in the CHP sector.

[U]nder the previous Minister we committed to delivering 600 of the 1600 new public houses that were the agreed combined State and CHP ... targets. [We] will ... in fact exceed, that delivery target.

This will be the outcome we deliver despite a very difficult Government procurement process and the requirement that we leverage our own limited balance sheets to bridge the equity gap.

CHPs offer a robust, flexible, low risk approach to the delivery of new public housing supply. We are well controlled and regulated and capture, retain and recycle capital into housing outcomes forever in order to sustain or enhance the overall economic, social, environmental, and cultural well-being.

CHPs are uniquely positioned to deliver place based flexible and context specific housing solutions ... releasing Government capacity to focus on other more pressing matters [to] add greater value.

We would like to see good representation of people on the [Kāinga Ora] board that have an in-depth understanding of community, community regeneration and community housing providers.

[We] see little evidence of Government recognition that the delivery of more public housing on its own **will not** address the housing system failure and the massive housing affordability gap.

The Intermediate Market [around 200,000 working households] who cannot afford to rent or buy a home at approximately 30% of their total combined gross household income, have very few choices or affordable housing options. [We] will not see significant improvements until we address the root cause and support more whānau [out of] the rental poverty trap and towards security of tenure.

Government support, enabling and funding of affordable housing solutions (rent to buy and shared ownership) will bridge the gap and unblock the biggest barrier [to security of tenure, ownership].

Beacon Pathway

[A]ffordability of housing lies not just in purchase/build cost, but also in its operation. Houses that are energy efficient, well insulated and easy to heat, and water efficient [cost] less in running costs. [This is a critical part of affordability for a vulnerable tenant.](#)

[R]ecent research for the Building Research Levy looked at what outcomes made for successful medium density. Key amongst these was [Connectivity](#) - connecting infrastructure enables safe, universal access to important destinations. This is about considering whether developments are built close to, or have good transport options to access, the places people need to go. Or alternatively to consider how developments can offer jobs, amenities and services on site.

Beacon supports the principle that housing should contribute positively to well-being: there is considerable evidence that warm, dry and healthy housing has not only physical health benefits, but also improves mental health, and ... secondary outcomes [inc.] in education and work.

Emerge Aotearoa

[T]he state needs to play a critical role in addressing the pressing housing needs and issues across Aotearoa. We welcome the reference to partnership and collaboration in the Bill and, as an existing partner in ... a broad range of health and housing services, we share a common purpose.

We strongly commend and agree with clause 12: The objective of Kāinga Ora—Homes and Communities is to contribute to sustainable, inclusive, and thriving communities.

[T]he agencies of the State need not do all of this work themselves and that there are other willing and able partners such as EmERGE Aotearoa, with spare, underutilised capacity wanting to play a bigger role and be a more significant provider of housing solutions and services alongside agencies.

EmERGE Aotearoa has a pipeline of housing projects that will produce over 100 homes over 3 years. [We] will be investing our own capital, leveraging our own balance sheet and accessing government funding through IRRS. These homes will provide social (public) housing for those most in need. [W]e could deliver even more housing if the funding settings were improved.

CHPs have a history of innovation and a social licence to operate in the delivery of sustainable, inclusive, and thriving community outcomes. [I]t would not always be the best use of public money to invest in the development of new capacity within Government agencies when that same capacity, capability, and experience already exists and is underutilised in the CHP sector.

CHPs offer a robust, flexible, low risk approach to the delivery of new ... supply.

Habitat for Humanity New Zealand

Kāinga Ora Homes and Communities has the potential to drive such an inclusive approach, or to take a narrow view occupied by its own large-scale activities and excluding other responses/actors.

[B]ringing together the state's housing development capacity and its functions in tenancy management, guided by a long-term view of housing and urban development, has instinctive potential benefits. Principle among these is the potential to drive coherence across key activities along a clear vision that addresses government's intentions for homes and communities.

[Realisation] rests in part on the quality and content of the long-term vision encompassed by the GPS process set up in this legislation. Habitat for Humanity introduces below two tests of housing policy (the content of the GPS must pass these two tests);

- that of housing adequacy for all people, and
- that of housing equity for all groups (especially vulnerable groups) in society.

There are a variety of specific ways that this legislation could drive ... coherent and diverse set of responses to community needs, to the extent that the agency understands its place within a housing system alongside other government agencies, NGOs, iwi and private sector players.

Decisions about actual housing developments such as what mix of products they offer will be one essential test and practical outworking of the agency.

The proposal to integrate the Government's major operational initiatives in housing [its rental portfolio, its developer (HLC) and the kiwibuild team (affordable supply)] appears to make sense.

[This] allows for the intentional integration of public and affordable housing typologies within wider place-based or market-based housing strategies. The hope is that [the distinct needs of geographical communities \(e.g. Mangere\) or of markets \(e.g. households with accessibility requirements\) can be considered](#) from the perspective of the range of products/programmes that meet their needs.

[T]he range of housing products offered by government is very limited, primarily consisting of state rental) and homes for first home buyer purchase (requiring bank criteria and reaching a small [cohort]). [A] specific hope is that the range of products government recognises ... can be broadened and can meet the needs of more New Zealanders.

The Bill makes numerous references to impact for current and future generations and to setting and implementing a long-term view. This is excellent and to the full extent it is realised, will be extremely positive for improving housing and wider outcomes.

Habitat for Humanity recognises two tests for housing policy: housing adequacy and housing equity.

Housing adequacy refers to the characteristics of a housing arrangement that provide for immediate wellbeing, and are defined internationally as habitability, suitability, affordability, security of tenure, freedom from crowding and freedom from discrimination.

Great strides can be achieved for these groups relatively quickly through legislation and regulation as well as incentive and subsidy programmes targeting private landlords while increasing supply of public rentals. Housing adequacy is a short- and medium-term key priority.

[E]nsuring housing adequacy may, with significant focus, be achievable in a 10-year time horizon, the work of restoring homeownership pathways to all the groups, is a long-term commitment.

[Moving people on modest and median incomes into homeownership is a domain of expertise for organisations such as Habitat for Humanity alongside other\[s\] in the community sector.](#)

With products that provide a pathway to homeownership (such as rent to buy, shared equity) made available in carefully targeted ways over time, equity between ethnic groups, generations, and other dimensions of disadvantage could be progressively address[ed].

If we stop at a 10-year horizon at this point in time, it is very unlikely we will be adequately far-reaching in our approach to housing equity.

Habitat for Humanity has a vision of housing needs being met for all New Zealanders through a coherent and diverse set of responses, where the work of government, community housing providers, iwi, private organisations and others come together in planned ways that collectively meet diverse community needs.

Kāinga Ora Homes and Communities has the potential to drive such an inclusive approach, or to take a narrow view occupied by its own large-scale activities and excluding other responses/actors.

The make-up of the Board, the content of the GPS, the internal processes of advice and the capacity to found meaningful partnerships are all part of the ways this question will be answered.

People conversant with or embedded in other parts of the housing system should have specific and visible roles to play as Ministerial advisors, on the Board, as advisors to the executives, as holders of formal partnerships beyond delivery contracts, and through regular communications and forums.

[Without a significant programme of intentional work to maintain meaningful partnership, the agency \[risks being\] subsumed by internal operational needs and \[political\] demands.](#)

A coherent and considered approach to procurement led by the agency, would be a significant and helpful addition to its roles and functions.

The Bill could be strengthened by being specific that a coherent and diverse set of housing responses targeted at local housing needs and inclusive of government and non-government players (as appropriate) be integral to all housing developments.

Hamilton Christian Night Shelter

What we have discovered is that the ex-guests who survive as tenants are the ones who have obtained secure Housing New Zealand tenancies and are paying income related rents. So we totally support the statement “It will have a strong social mandate, including being a fair and reasonable landlord”.

LOCAL AUTHORITIES AND HEALTH BOARDS

LGNZ

LGNZ agrees with the key roles of Kāinga Ora – Homes and Communities; to be a public housing landlord and agency tasked with leading and co-ordinating urban development projects. However... the summary of “co-ordinating urban development projects” is a misnomer. What is proposed is an urban development agency (UDA). This new agency will be a land developer with significant power to acquire and re-zone land, fund or co-fund investments and coordinate construction.

[A] GPS for housing and urban development is a sensible idea for overall direction and priorities. If councils are to coordinate development with a UDA, and ... absorb developed land into operations, maintenance and renewal planning, then it is critical the timing of the GPS aligns with LTPs.

[M]inisters appoint members to the board who, collectively, have knowledge, experience and capability in “perspectives” of Māori, public housing tenants, developers and local government. It is unclear what “perspectives” means. [G]reater specificity is needed toward what background ... this board should bring, and this should encompass the technical nature of this policy space.

[T]he urban development section of this Bill requires greater clarity in framing roles and responsibilities for the planned UDA. While we understand that considerable flexibility is needed to align a UDA to meet varying requirements in different locations (ie one size will not fit all).

Regarding the planning and consenting, LGNZ disagrees with powers to override, add to or suspend provisions in local planning documents (e.g. district plans). These documents are created locally, have undergone public review, and should provide guidance for UDAs.

Local councils would welcome creation of a UDA specific building consenting authority (BCA) as long as all liability remains with that BCA and is not transferred to a council.

LGNZ will support a UDA’s ability to assemble land through compulsory action, [if] consistent with the protections laid down in the Public Works Act, ... [with] appropriate checks-and-balances.

LGNZ agrees a UDA should have infrastructure powers. Built into these powers should be that local government must be coordinated with as a major partner (not stakeholder).

We agree that “growth should pay for itself” and generally support a UDA’s access to tools and forms of revenue that may not generally be available under other conditions.

Recommendations

- Define key terms and qualifications regarding who should sit on the board;

- More clearly define and narrow organisational focus;
- Clarify development powers, and address the following recommendations:
 - Ensure local powers are not eroded in integrating planning documents;
 - Ensure transparent checks-and-balances for compulsory acquisition; and
 - Refrain from developing local reserves.
- Clearly outline categories of partners and stakeholders for engagement;
- Require a “development agreement” of some type with locally affected councils;
- The UDA should not be exempt from paying development contributions;
- Balance mitigation and adaptation to future-proof community planning; and
- Recognise local councils as potential partners in UDA activities.

SOLGM

SOLGM supports the establishment of (Kāinga Ora) in principle. We particularly support the notion that Kāinga Ora is not just about building homes, but is about building communities.

[T]his leadership should extend to working with the industry to ensure there is a sustainable pipeline of housing and development, and developing the capacity of the development industry.

[Regarding Board membership the] provision lists knowledge of the perspectives of local government as one requirement. This ... could apply to, for example, any member of a road contracting firm or ... public policy consultancies. We suggest that the proper formulation should be to call for previous experience as an elected member or staff member working in a local authority.

Part 1 of Schedule 1 of the Kainga Ora – Homes and Communities Bill transfers the rights and liabilities of HNZC and HLC to Kainga Ora. [This provision creates ambiguity on whether Kainga Ora is liable or exempt from paying development contributions for its developments.](#)

Kāinga Ora will be undertaking developments at scale. The cost of providing infrastructure in and to these developments may impose a significant financial cost on the community.

We support the GPS-HUD in principle, as providing a clear statement of the Government’s priorities and ... unifying ... agencies involved in the provision of housing and urban development.

It is far from clear how the GPS-HUD aligns to [other] planning instruments. Logic suggests housing and urban development might ... have some degree of primacy over many other requirements... [I]f interrelationships are not made clear in statute, the result will be ... competing interpretations.

[L]inkages between the GPS-HUD and other instruments might be made clearer if the legislation included a statement of purpose. This would provide agencies with further guidance in interpreting the intentions of Parliament, [sending] a legislative signal that the GPS-HUD is [relevant].

[A] statement of purpose might read *“The purpose of the Government Policy Statement on Housing and Urban Development is to – (a) state the Government’s intended direction and priorities for housing and urban development (etc)”*

Auckland Council

We agree with the intent of this Bill to consolidate the government’s housing and urban development initiatives, currently spread across multiple agencies, into a ‘one-stop-shop’. This will avoid duplication and create efficiencies in collaboration, coordination and expertise.

[O]ur primary concern is to ensure that the establishment legislation recognises the significant overlap in functions between local government and the functions of the new entity.

We would like to ensure that Panuku can continue to deliver Auckland's regeneration programme at scale and pace without unnecessary relitigation, duplication of effort and delay.

Provision or enabling of infrastructure and amenities by the new entity will have implications for wider infrastructure networks. This could have significant... implications for local authorities.

[T]hese significant overlaps need to be recognised and better provided for by:

- operating principles that recognise the overlapping functions;
- explicit requirements for Kāinga Ora-Homes to engage with local government;
- clarifying how the GPS will apply to local government, and
- explicit requirements to engage with local government in the preparation of the GPS.

Auckland Council supports the purpose of the legislation and the overarching objective of Kāinga Ora "to contribute to sustainable, inclusive and thriving communities" [section 12(1) and (a) through (c)].

[Auckland Council is] concerned that 13(1)(f) provides a broad mandate for the entity to initiate or undertake any type of urban development in any location. *In our view 13(1)(f) should be limited to situations where the market and current players cannot deliver and where Kāinga Ora – Homes and Communities can add value.* [This] will create a focus on complex urban development projects such as contaminated brownfields or where there is a recognised market failure, a desire to trial new methods/innovations; or a lack of commercial feasibility for regeneration, despite clear ... benefit.

The council supports 14(1)(a)-(f) on quality housing, tenant wellbeing, and community connections. We believe this provides stronger direction [requiring] HNZ to exhibit a sense of social responsibility.

[Clause 14(g)] should reference 'value for money'. While it is important to deliver quality infrastructure that meets community needs this should be balanced with making prudent investment decisions for current and future infrastructure needs.

Stewardship and sustainability (14(1)(i) and (j))

We strongly support principle (i). We also support (j) however, we *recommend that sustainability should include reference to financial and economic sustainability.* [I]nvestment in housing, community amenities and infrastructure [should factor] in the "whole of life cost" of any new assets.

Clause (14)(1)(k) requires the entity to partner and have early and meaningful engagement with Māori and offering Māori opportunities to participate in urban development. [We] note that in urban environments this needs to acknowledge both maatawaka and mana whenua.

We would also like [a] similar operating principle in relation to local government: "partnering and having early and meaningful engagement with local authorities within the areas in which Kāinga Ora – Homes and Community is operating."

Māori interests

[C]lause 4 should explicitly reference the Crown's obligations with respect the Treaty of Waitangi in addition to Māori interests. As currently drafted the Bill does not explicitly require it to do so.

Our strong preference would be to include a provision similar to the Conservation Act, "This Act shall so be administered and interpreted to give effect to the principles of the Treaty of Waitangi."

Bay of Plenty Regional Council

Section 13(1)(k) and (l) – Functions of Kāinga Ora:

BOPRC is concerned that the regulatory functions of Kāinga Ora, ... are not included in the Bill, but will be specified in a second stage bill. We are uncertain of the full scope and nature of the powers that Kāinga Ora will have in relation to housing and urban development functions.

Our concerns relate to:

- Powers to override or suspend provisions in regional plans or the regional policy statement.
- Power for Kāinga Ora to be the consenting authority for own projects.
- Powers to require or direct infrastructural investments in Long Term Plans.

Canterbury District Health Board

[MoH]requires the submitter to reduce potential health risks to ensure the public health significance of potential adverse effects are adequately considered during policy development.

Health and wellbeing is influenced by a wide range of factors beyond the health sector... described as the conditions in which people are born, grow, live, work and age, and are impacted by environmental, social and behavioural factors - the 'social determinants of health'.

An example of one such factor which influences health ... is housing. The WHO cites that improvements in housing lead to improved mental and general health. Specific factors such as security of housing tenure, temperature, air quality, dampness, design, location and financial assistance to access contribute.

The recent Mental Health and Addictions Inquiry Report: He Ara Oranga also explicitly highlights the connection between housing and mental health outcomes, stating "threats to basic needs such as affordable and safe housing... leads to chronic stress (which) compromises wellbeing".

The CDHB encourages Select Committee to consider alternative housing access options which enable low income families into their own homes, or long-term rental accommodation. This Bill provides opportunity to legislate alternative housing models, such as shared equity schemes.

The CDHB supports the establishment of Kāinga Ora- Homes and Communities as previous systems and approaches have not achieved equity of housing access and the co-benefits related to [that].

The CDHB is pleased to see Māori interests acknowledged and protected ... however the wording of this section does not incorporate a partnership model of working with Māori. [The] CDHB recommends that tangata whenua representation on the Board is legislated to represent Māori interests rather than just 'understand perspectives of Māori clause' (as per 11(1)(b)(iii)).

The CDHB supports the concept of Housing Navigators and Brokers to support Māori which could be legislated within the Bill. This role is intended to support Māori at any stage of housing need or aspiration as detailed in 'Kāinga Strategic Action Plan: a plan to improve housing outcomes for Māori in Tāmaki Makaurau'. [This] is a practical way to achieve equity for Māori in ...housing.

The CDHB recommends that appointed members to the board have knowledge of health and wellbeing, accessible housing (universal design) and environmental impacts.

In 12(c) the CDHB recommends that health is included [in this objective]. [N]ot all recognise the link between wellbeing and health, nor housing as a fundamental determinant of health.

The CDHB agrees in principle with the objectives of this Bill, however recommends that housing is recognised as a fundamental human right given its importance as a determinant of health and New Zealand's commitment to a number of international treaties.

Under the 'Urban Development' in (1)(f-j), ensuring that urban development supports social connections via transport choice and access to community services (such as health services) needs to be included. Hidden costs of housing are often related to the development of land which is some distance from amenities, employment, services and education and are not serviced by public

transport links. When factoring in daily transport costs ... such housing is no longer 'affordable', yet this aspect is rarely factored into planning and design.

Urban sprawl ... impacts upon [health, social and environmental outcomes. This Bill [could] prioritise [brownfield over greenfield development] land to mitigate ... adverse environmental impacts.

Canterbury Regional Council

[Previous concerns] revolved around the diluted role of regional councils in plan preparation and decision making as a result of UDAs, and ... poor outcomes for the sustainability and liveability of cities and towns, and the necessary integrated approach to the sustainable use of resources.

We agree that the focus of the GPS-HUD, as well as the functions of Kainga Ora, should be about more than just house building and take a more holistic view of building sustainable, inclusive and thriving urban communities. This requires consideration of related business, community and infrastructure developments, alongside housing, [for] efficient, integrated, mixed-use developments.

Environment Canterbury endorses recommendations made by SOLGM [seeking review to]:

- clarify the linkages between the GPS-HUD and other planning instruments
- clarify the purpose of the GPS-HUD, in order to provide agencies with further guidance and understanding of the Government's intentions for how the GPS-HUD should be considered
- clarify the expectations under the GPS-HUD, in particular that the GPS-HUD will not only state the Government's expectations of other agencies but will also state how the Government intends to support other agencies to meet its expectations.

Christchurch City Council

To achieve its noteworthy objectives, the Crown entity ... needs to take account of the following:

- i. Effective, localised engagement and decision-making with councils and their communities
- ii. A human rights-based approach that prioritises affordable housing provision
- iii. Existing local planning policies, strategies and documents relating to urban development

[M]ore comprehensive housing outcomes [will require] locally driven partnerships and decision-making processes [as demonstrated] in residential developments in Tamaki and Waimahia Inlet.

To be given effect, the Bill's objectives [must] recognise existing communities and their connections.

[The four well-beings approach in the bill elevates] housing as a merit good... How housing is framed and discussed is important for identifying a broader set of responses to the housing challenges. [It] is recommended that the human right to housing, based on the premise of the seven dimensions of 'housing adequacy', is more explicitly noted in the Bill.

In carrying out its functions [the entity] should be required to either be consistent with, or at least have particular regard to the plans, policy documents and commitments made by local authorities [in carrying out the local authorities' own legal obligations].

The Crown entity's powers will also need to follow through to the funding of infrastructure.

[Kāinga Ora will] need to balance community wellbeing and aspirations with the need to respond decisively on key challenges... to enhance community participation and cohesion. The emphasis needs to be on collaboration, [relationships and partnership] and interagency communication.

[T]he primary purpose of the urban development activities ... should be the provision of affordable housing. Further, the affordable housing developed should remain both for its ongoing supply and so that mixed housing and communities are maintained.

[In] Clause 14(1)(f) – insert new subclause to read:

(ii) “ensuring that the affordable housing being developed remains affordable”.

[The Government Policy Statement] should recognise housing as a human right.

[Board composition] should include reference to a community housing provider, preferably regulated under government regulations, as an option for board membership.

Dunedin City Council

[DCC] supports the establishment of Kāinga Ora to deliver complex urban development at scale and pace, unlocking challenges and working in partnership with councils and other ... partners.

The DCC requests Kāinga Ora specifically recognises local government as a partner that owns infrastructure, property and land, and is a provider of community housing.

As a provider of community housing, the DCC recommends Kāinga Ora undertake a review of the Accommodation Supplement and Income Related Rent Subsidy to encourage more housing of this nature and investigate the inclusion of councils as providers.

Kāinga Ora will create potential for a long-term, strategic, effectively-staged and coordinated urban development programme. The DCC requests the medium-growth cities like Dunedin are balanced alongside the needs of high-growth priority areas such as Auckland.

The DCC proposes climate resilience in urban development is added as a specific function of Kāinga Ora. This would help reduce the creation of new climate risks and... minimise adaptation costs.

Hamilton City Council

We agree that Kaainga Ora has the potential to effectively and efficiently address existing complex situations, particularly where there may be multiple ownership or numerous stakeholder[s].

We welcome HUDAs role as having the necessary purpose and tools to facilitate/navigate key legislation and funding arrangements/challenges more efficiently [and] enable councils to... progress opportunities in cross-boundary proposals identified by the Hamilton-Waikato Metro Spatial Plan.

Kaainga Ora powers are seen as an additional tool to assist in the delivery of housing and business land and meeting ongoing requirements of the NPS-UD when it is reviewed later this year.

Of further practical importance is the support for innovation, capability and scale within the development and construction sectors. The detail on this will need to be elaborated on in the second Bill, including how Kaainga Ora ... [will] secure and deliver public housing solutions that contribute positively to well-being.

[H]ousing and urban development are inextricably linked to transport and three waters infrastructure. Ministers need to have regard to both the GPS on land transport and the emerging infrastructure strategy report of the New Zealand Infrastructure Commission - Te Waihanga.

Clause 24 ... permits government to state its expectations of other agencies. [T]his expectation should ‘run both ways’ i.e. the clause should not only allow central government to specify its expectations of other agencies, but also require it to state how it intends to support and collaborate with other agencies (including TAs) to meet its expectations and those of the community.

HCC supports collaboration and effective partnerships and having early and meaningful engagement with Maaori and offering Maaori opportunities to participate in urban development projects. [A]ny future project should ensure the Vision and Strategy for the Waikato River is also given effect to.

[G]reater alignment of spending programmes between local and central government is beneficial and indeed critical for investment and operational alignment with future regional development.

Kapiti Coast District Council

Not accessible in submission format.

Southern District Health Board

Public Health South (PHS) acknowledges that the housing environment is a key social determinant of health, and recognises that the links between housing and health are multidimensional. [T]his Bill [is] an opportunity to promote a Health in All Policies (HiAP) approach, as positive community health outcomes accrue when all organisations remain mindful of their potential to impact.

PHS recommends that future developments under Kāinga Ora proactively identify and mitigate potential negative impacts on existing local resources, infrastructure, and public health outcomes.

PHS also recognises that healthy housing is not distributed equitably through society. We have a responsibility to contribute to a reduction in the inequitable health impacts of poor-quality housing.

Supporting and advocating for the provision of quality new housing, increasing the availability of affordable homes across all tenures, and growing and maintaining a social housing sector providing quality homes that are accessible to all in need will help us reach this goal.

PHS recommends that Kāinga-Ora Homes and Communities equitably addresses the housing demand for public housing and affordable owner-occupied dwellings through robust public consultation and rigorous planning. This includes equitable resource allocation and tenant support.

The strong focus on urban development in the proposed Bill is supported by PHS.

Nelson Marlborough Health

Not accessible in submission format.

Tauranga City Council

Not accessible in submission format.

Toi Te Ora Public Health (Bay of Plenty and Lakes DHBs)

The key role of Toi Te Ora is to promote, protect and improve population health, prevent ill health and minimise the risk of disease and injury through population-based interventions, with a focus on reducing inequalities in health.

The World Health Organization (WHO) defines housing as a broad concept involving four interrelated elements: the home, the dwelling, the community, and the neighbourhood. Housing is a significant determinant of health and a significant influencing factor in health inequalities and poverty.

Good quality housing and secure tenure is essential for physical and mental wellbeing. The lack of affordable housing options and the poor condition of some housing has an inequitable effect on the health of many people in Aotearoa.

A house needs to be uncrowded, warm, dry and affordable for its occupants, including any associated cost such as heating.

Homelessness and living in unhealthy homes and insecure tenancy arrangements is largely beyond the control of individuals, especially children, and requires action by public authorities at all levels.

The Bay of Plenty DHB supports the direction of Kāinga Ora. The Bill provides greater flexibility to contribute to sustainable, inclusive, and thriving communities than the Housing Corporation Act.

BRANZ has identified significant need for immediate repairs in the homes of low-income households. Immediate repairs refer to repairs to components of a home in serious or poor condition.

BRANZ estimated in 2013 the average cost of immediate repairs to be \$5,139. For the lowest household income bracket this represents more than 25% of the annual household income. 79% of homes assessed by BRANZ required immediate repairs rising to 88% in the lowest household income bracket. If only the envelope of the home is considered 33% of homes require immediate repairs at an average cost of \$5,481. For low income households the cost of immediate home repairs is beyond what they can afford.

Financial assistance through the EECA is provided for insulation and heating improvements. In many cases the effectiveness of improvements is limited by the condition of a home's envelope. Some homes have multiple defects which can prevent the upgrade of heating and insulation.

There is no provision, from EECA, for financial assistance to make immediate home repairs, which would enable the benefits of insulation and heating improvements to be realised.

The Bill, as written, could allow for financial assistance for critical home repairs however, it is not clearly stated. There is a significant need in the community for immediate home repairs which could be addressed through grant schemes, no interest loan, and low interest loan[s]. This would assist in ... *"contributing to sustainable, inclusive and thriving communities"*.

[We] recommend that the statement, 'financial assistance for immediate home repairs', is added to Part 1, subpart 2, Section 13(1)(c).

Seventeen district council's areas across New Zealand are projected to have a population reduction over the next 25 years. [Un-managed this] is likely to have a detrimental effect on housing quality and therefore community wellbeing. Kāinga Ora is likely to own housing stock in these communities and is ideally placed to develop expertise in this area.

The Bay of Plenty and Lakes DHBs (Toi Te Ora) recommend that an additional function under the urban development functions be added relating to *assisting communities and local authorities plan for population decline and negative growth, and the subsequent impact on housing*.

URBAN - The term urban is used throughout the Bill. Urban is defined as "of, relating to, or designating a city or town". The Bay of Plenty and Lakes region has many rural settlements that face significant housing challenges which could benefit from support with regeneration projects.

A high proportion of those living in rural settlements are Māori. Applying a strict definition of the term urban could disadvantage rural settlements and Māori with the level of assistance they receive.

Waipa District Council

Waipa District Council generally supports the Bill, particularly in relation to the proposed urban development functions and the preparation of a GPS on Housing and Urban Development.

Clause 10(2)(f) requires the Ministers to appoint members to the Board who... have "... knowledge and experience of, and capability in ... perspectives of local government". Urban development is inextricably intertwined with the provision of public infrastructure and community aspirations.

[T]hese are the province of local government and ... at least one Board member should have first-hand experience in local government, either as an officer or an elected official.

[E]ffective partnerships are specifically acknowledged in the Bill. However nowhere is local government mentioned... [success] will require close coordination with local government.

[I]t is our understanding that Kainga Ora could claim exemption from the payment of development contributions. This is of significant concern to Councils and the ratepayers and property owners that would be required to make up the funding deficit. *We would urge a commitment from the Crown, enshrined in legislation, to contribute their appropriate share.*

It is anticipated that Kainga Ora will (sic [alt: *should?*]) have the tools necessary to efficiently resolve many of the legislative and funding issues that arise in cross-boundary circumstances.

Wellington City Council

Not accessible in submission format.

Western Bay of Plenty District Council (WBOPDC)

The regulatory impact statement sets out the complexities of delivering modern urban environments – essentially requiring a paradigm shift from towns and cities that distinguish between places where people work and places where people live, to urban environments centred around nodes of mixed use social and economic activity.

We support the submission of SOLGM that the powers of Kainga Ora should [respect and uphold] the rights local communities and local authorities have in local policy decisions as much as possible.

The current system does not have the range of tools, powers and support required to facilitate comprehensive, large-scale, timely and transformational urban development projects.

[Issues include]:

- a lack of coordination between central and local government,
- a perception by some Territorial Authorities that they have difficulty in funding the infrastructure required,
- Lack of integration between land use and transport planning
- A mismatch between Local and Central Government planning philosophies and legislation.

We hope Kainga Ora will work with local authorities to identify the best locations for... projects and prioritise guaranteed planning and funding support, be it in brownfields or greenfields areas.

We note under Well-Functioning Urban Environments Kainga Ora will focus on assisting communities “where it has housing stock” to develop and thrive... We support this operating principle, however we want to ensure that it doesn’t [disadvantage] Tauranga and the Western Bay.

We are the only district in New Zealand where Housing New Zealand’s stock was transferred to another entity. As such, when it is established Kainga Ora will own few homes in the area.

We have a significant need for public housing... It makes sense to redevelop these sites [where stock was transferred from HNZ] to provide more housing. However these areas need the same careful thought about redevelopment as cohesive and safe places to live, as [others areas].

We support the submission from SOLGM on the need for the GPS to [align] with other instruments.

OTHER ENTITIES, RŌPŪ, AND INDIVIDUALS

Auckland Action Against Poverty

The roots of the housing crisis are in housing being treated as a commodity which can be bought and sold for profits instead as a public good and a universal right.

While [property investment] makes some people very wealthy, it is not very productive to our economy and detrimental to the wellbeing of people who are in private rentals or are homeless.

The concern we have is that these interventions [in the Kāinga Ora-Homes and Communities Bill] are not addressing the root causes of the housing crisis - the commodification of housing - and do not involve a strategy to avoid the negative impacts of development on low-income, Māori and marginalised populations.

[L]arge-scale developments which this Bill encourages could lead to gentrification of low-income neighbourhoods because the government is facilitating developers to build private market housing which is driving up house prices and displacing people. As seen with the Tāmaki Regeneration, people have been displaced ... and many of the new houses built are being sold for over \$1 million.

While we agree at face value with the principles of providing quality affordable housing, access to jobs and amenities, and wellbeing for future generations, our view is that in the development of public land, the government needs to be building one hundred percent state housing and funding papakāinga housing, not private market housing.

We need to be moving towards the decommodification of housing so that we can have a genuine right to housing for all.

We recommend in all developments that the community has participation in the plans, not just consultation after plans are drawn.

All new developments should have an impact study and a strategy to avoid gentrification and displacement.

We want to see the protection, expansion and democratisation of state housing.

We would like to see legislation that shows the government's commitment to ending poverty and homelessness through engaging in a mass state housing build programme.

In many of the large-scale developments ... so far, over half of HNZ land is being sold to developers to build private market housing. We see this as a form of privatisation by stealth and a policy which will be detrimental to the wellbeing of people in the future. Once the land is in individual property titles it can never be used in the future for the purposes of building more state housing or to be returned to mana whenua.

Conversations around urban development, housing and land are ultimately conversations about colonisation... [O]ur concern rests in [the Bill's] facilitation of land transfer into individual property titles through the building of private market housing on public land...

[I]wi involved in regeneration should not be placed in conflict with local communities. AAAP would like to see the government taking an active role in preventing displacement and dispossession. Building private market housing on state housing land will always lead to the displacement of people who cannot afford private housing.

[Clause] 13(1)(b) is focussed around community organisations supplying state housing. While Community Housing Providers (CHPs) offer important wrap around services for people, developing a social housing market comes with significant risks. The government is pouring massive amounts of public money through the Income Related Rent Subsidies (IRRS) to these providers, some of which are international companies and are unregulated in their delivery of 'social' support. There lacks a public accountability process in this model and if these groups are not financed adequately it could lead to privatisation in the future.

[T]his Bill is facilitating regeneration projects that risk the gentrification of low-income and state-housing communities. In particular in 14(1)(f) which states that housing must be developed with an appropriate mix of public, affordable and market housing. Much of the international academic research suggests that social mixing or mixed-tenure occurs at the detriment of state housing tenants and their communities...

Wealthy people do not give poorer neighbours social capital or create diversity as the policy suggests.

The most effective way the government could contribute to addressing the housing crisis is to engage in a mass build of quality state housing and to fund papakāinga. The government would need to write into legislation the security of tenure and the security of state housing provision. [Sufficient] state housing to house all those who are homeless and all those in expensive and substandard private rentals, ... this is the most effective way to solve the housing crisis and simultaneously combat gentrification and displacement in low-income and marginalised communities.

Being a landlord to state housing tenants and at the same time being the urban development authority which is redeveloping state housing areas is a conflict of interest.

State housing tenants deserve to have a landlord that has their interests at heart.

Housing New Zealand should have a role in advocating for tenants on proposed changes to their communities. Public tenants should also have more democratic determination over what happens.

While HNZ has not always been a strong advocate for its tenants, the disestablishment of HNZC into Kāinga Ora removes the potential for a democratic voice for state tenants.

Abbeyfield New Zealand submission on Kāinga Ora – Homes and Communities Bill

CHPs have a wide range of expertise, are community based, innovative and have proven ability to be sound stewards of national resources. Many also provide wrap-around supportive services for tenants, enhancing their ability to be effective tenancy managers with a focus on wellbeing. Greater collaboration and partnership with CHPS will reliably deliver better results for those in housing need.

Cross-government collaboration would also be a valuable addition to this section.

ActionStation Submission to the Kāinga Ora-Homes and Communities Bill

The Housing Register waiting list for public housing has over 11,000 people on it [March 2019]. But according to the housing stocktake report in 2018, the real need for social housing is much greater.

Our wish is that this opportunity is taken to create the foundations needed for everyone in New Zealand to have their human rights to housing and community met. It is also our wish that this new Crown entity is grounded in legal best practice and recognises the articles of Te Tiriti o Waitangi.

[O]ther problems we see in the 'Mixed tenure' model, as it is currently being rolled out are:

- its insubstantial ability to address the root causes of the housing crisis;
- the lack a of thoughtful planning of how to mitigate the negative effects of the developments on the generally low-income, Māori and Pasifika communities it is being enacted upon; and
- that international research indicates that social mixing or mixed-tenure occurs at the detriment of public housing tenants and their communities.

We believe it would be wiser for the government to raise its self-imposed Budget Responsibility Rules to allow for substantial financial investment into public housing, rather than relying on revenue from the privatisation of Crown land.

We believe an increase in public housing would compel private rental prices down, quality up and save on public spending in the long term.

As put by AAAP's Ricardo Menendez in March: "In the long run, building enough state homes would help alleviate the ballooning costs of \$36m/year in subsidising moteliors through emergency housing grants, and the \$1.7B going to subsidising private rentals through the accommodation supplement."

If [Kāinga Ora] is going to be a 'world class landlord', it is important to have a tenants representative on the Kāinga Ora-Homes and Communities board. We also support the creation of a subsidiary public housing tenants board to inform and support that person.

Adrian Tyler

The current wording of the bill does not ensure that the Treaty of Waitangi is binding on the actions of the proposed new entity 'Kainga Ora' in that the wording states (paraphrased) 'will have the capability and capacity to honour the Treaty' rather than 'will be bound by the Treaty'.

I was not able to confirm ... how much clarity the bill gives to the types of financial assistance Kainga Ora will be able to make available for housing and to whom. The Kiwibuild initiative does not (to my knowledge) address the difficulty of procuring a deposit for a house on low or even average income.

Meanwhile most people who are renting are currently paying as much if not more than those making mortgage payments on their own homes - simply for lack of a deposit! [This Bill has the opportunity to address this disparity and should explicitly do so.](#)

I believe NZ citizens have been disadvantaged by immigration policies that have meant buying a home in [one's] own childhood neighbourhood has become an impossibility. I acknowledge the ethical complexity of this issue.

Recommendations

- Reword the bill to ensure the proposed new entity is clearly bound to honour the Treaty.
- Ensure that the bill explicitly allows for the proposed new entity to provide zero deposit and/or rent-to-buy finance - either by way of direct loan or by way of acting as guarantor for zero deposit loans with partner lending organisations.
- [E]xplicitly direct Kainga Ora to either prioritise, or be limited to only serving NZ citizens

Blind Foundation – Royal New Zealand Foundation for the Blind

New Zealand is party to seven of the nine core human rights instruments. These instruments set out binding legal obligations on state parties to protect, respect and fulfil the rights contained therein.

The Right to Adequate Housing

Article 11(1) of the International Covenant on Economic, Social and Cultural Rights (ICESCR) provides the most significant legal source on the right to adequate housing. The most authoritative legal interpretation of this right was set out in a 1991 general comment by the United Nations Committee on Economic, Cultural and Social Rights (CECSR), which considers countries' compliance with ICESCR (United Nations Committee on Economic, Social and Cultural Rights (1991)).

The right to adequate housing: Article 11(1) CESCR general comment No. 4. Geneva: United Nations).

This general comment makes it clear that the right to housing includes:

- security of tenure, for example, legal protection from arbitrary eviction;
- availability of services...;
- affordability, for example housing costs as a ratio of income;
- habitability, [inc] soundness of physical structure and absence of dampness and crowding;
- accessibility, for example by all ethnic, racial, national minority and other social groups;
- location, for example in relation to employment and schools; and

- cultural adequacy, for example taking into account traditional housing patterns.

The right to housing should not be interpreted in a restrictive sense. It should be seen as the right to live somewhere in security, peace and dignity (UN Committee on Economic, Social and Cultural Rights (1991).

The right to housing for women, children and disabled people, respectively, is specifically mentioned in the Convention on the Elimination of all forms of Discrimination against Women, the Convention on the Rights of the Child and the Convention on the Rights of Persons with Disabilities. The latter convention emphasises accessibility requirements and also sets out disabled people's right to live independently and have the opportunity to choose their place of residence.

Aotearoa New Zealand needs to be accessible for everyone, including people with diverse needs. Accessibility includes private and public housing and needs to be considered as part of the government work programme on accelerating accessibility.

The Foundation welcomes the Bill's specific requirements around affordability and habitability, [and] the principles of Te Tiriti o Waitangi.

[We] are concerned that the Bill fails to incorporate the broader aspects of the right to adequate housing and ignores some vulnerable groups.

We recommend that the following specific amendments be made to the Act:

- a. Article 10(2) include a new subparagraph (subparagraph j) - "lived experience of disability"
- b. Article 11(b) include a new subparagraph (iv) - "able to engage with people with lived experience of disability"

Bob Smith

[W]hen will ALL NEW ZEALANDERS have equal rights?

Bryan Johnson

In replacing Housing New Zealand Corporation, Kāinga Ora Homes and Communities intends to uphold the principles of the Treaty and recognise and support Māori perspectives.

Citizens Advice Bureaux New Zealand

The overarching question we have about this Bill is whether it adequately prioritises a focus on public and affordable housing.

We believe that the proposed functions and principles underlying Kāinga Ora present a positive vision for the future of housing in New Zealand. This is particularly the case in relation to good urban design and well-connected communities, with mana whenua at the heart of planning and processes.

With HNZ being absorbed into a much larger Crown Entity, with a much broader focus, we are concerned that there is a risk of losing sight of those who are most in need.

The urban development focus for this new entity means attention is being drawn towards the provision of housing across the whole housing continuum (public, affordable, first homes, open market). While this is not a bad thing, it sits alongside the clearly articulated assurance from Government, that public and affordable housing are at the heart of the housing agenda.

We are anxious about whether the Bill provides enough clarity to ensure focus remains on providing appropriate housing solutions for those who are suffering the most.

[Public housing is not up to standard.](#)

A common feature of the housing enquiries we receive is that rental properties are poorly maintained, and provide unhealthy living conditions. Our analysis [of our records relating to housing enquiries] revealed a fairly bleak picture of our nation's rental housing stock, and of the attitudes of some New Zealand landlords to addressing the unhealthy living conditions.

Issues around sub-standard housing were prevalent for both private [and] public housing tenancies.

Common issues relating to public housing were mould and dampness, with related questions around the adequacy ... of heating and insulation. [Of HNZ tenant clients] 24% were seeking a transfer ... because of the sub-standard condition of their tenancy.

We are hopeful that [current legislative and regulatory changes] will result in meaningful change but there are other measures that need to be taken. These include regulation of landlords and property managers, and a robust compliance system that requires all properties to be certified as meeting minimum healthy housing standards.

There is also the opportunity to shift the focus on housing as a commodity to it being a social good.

Clause 14(1)(e) ... refers to Kāinga Ora managing its housing stock prudently, including upgrading and managing its housing to ensure it remains "fit for purpose". [I]t is important to be clear about what "fit for purpose" means. We think that the management of the housing stock needs to more clearly link to healthy homes standards and clear indicators of what "fit for purpose" means.

Centre for Urban and Transport Studies

The proposed Urban Development Authority will only compound the problem, since its creation ignores the reason for residential land being so very expensive.

[CUTS] therefore asks that, before setting up any new Authority, the Government:

- (1) properly establish economic justification (ie a basis in reality rather than idealistic ideology) for any further interference in the private sector market.

CCS Disability Action

The New Zealand Disability Strategy requires the government to ensure disabled people have access to warm, safe and affordable housing.

The government needs to take a leadership role and actively require universal design features in new housing through the Kainga Ora-Homes and Communities Bill.

The current lack of accessible housing negatively affects the wellbeing of disabled people and their whānau. It also creates costs for individuals, communities and the Government.

A significant number of disabled people report having an unmet need for housing modifications.

We recommend that:

1. A new subsection is added to Section 10 that states that the Board must collectively, have knowledge and experience of, and capability in universal design, disability rights, and accessibility.
2. A new subsection is added to Section 13 under "Housing" stating "to provide accessible rental housing for people with access needs." (recommendations abridged)

Presently there is a real shortage for housing that ... meets the diverse needs of New Zealand[ers]. [T]here is very little available in terms of accessible housing, in both the private and public sector.

Recent research [shows] "60% of homes will be occupied by people with disabilities during their life, but flexibility is not well planned...with focus ... on meeting minimum Building Code requirements".

A review of most social and private sector housing developments found that only 5% of all new homes built had three key universal design features:

- 1) A step free pathway and entrance;
- 2) A bathroom on the same floor as the entry level that can be used by most people;
- 3) Doorways and circulation space that allows for easy movement around the house.

Only 2% of new dwellings would meet the higher standards of a Lifemark® 3-star rating.

Why there is an undersupply

People often think of impairment/disability as something that happens to others, but not to them or their whānau [and] find it difficult to plan for the future and have trouble assessing uncertainty. Government departments sometimes still think of disabled people as a static group.

This can lead to them focusing on building a limited number of accessible housing rather than promoting accessibility features in all housing.

Economic and job costs

An inability to move for a job because of a lack of accessible housing can be one of the factors stopping people from working (Saville-Smith & Saville, 2012, p. 27). Economic growth depends, in part, on the availability and capabilities of human capital (The Treasury, 2013, p. 6). Currently, disabled people are underutilised in the labour market (Statistics New Zealand, 2018).

The New Zealand Institute of Economic Research has estimated that if we can improve access and lower the unemployment rate for disabled people we can expect to see:

1. A \$300 million a year reduction in Jobseeker Health Condition or Disability benefit costs.
2. Increased tax revenues of \$387 million.
3. An extra \$1.45 Billion increase in GDP (New Zealand Institute of Economic Research, 2017).

The recent discussion document for the new Ageing Strategy noted that a limited supply of accessible housing and difficult modifying existing properties may cause problems for an ageing population (Office for Seniors, 2018, pp. 15, 25-26).

[I]naccessible housing can become unsafe for many people as they age and result in injuries.

A lack of accessible housing can also cause people to go into residential facilities... This creates high costs for the government.

We fully endorse the Prime Minister's statement that housing is a right (Cooke, 2017). The Convention on the Rights of Persons with Disabilities has two articles that apply to housing.

Article 9: This article requires governments to ensure disabled people access, on an equal basis with others, housing.

Article 28: This article requires governments to:

1. Ensure disabled people have adequate housing.
2. Ensure access by disabled people public housing programmes.

The NZ Disability Strategy requires the government to ensure disabled people have access to warm, safe and affordable housing [and] to consult with disabled people on legislation and policies...

We recommend that the Government partners with disabled people when planning any future housing policies.

Development Contributions Working Group (DCWG)

The DCWG generally welcome the intention of the Kāinga Ora Bill to create a Crown entity focused on providing good quality affordable housing and to establish a clear mandate for large scale urban development and regeneration programmes. The potential for Kāinga Ora-Homes and Communities (Kāinga Ora) to positively help shape future communities is vast.

No explicit requirement to collaborate and engage with local government

The DCWG request that in S.14(1) of the Bill, that Kāinga Ora be explicitly directed to collaborate and build effective partnerships with local authorities when undertaking its functions.

Local government and Kāinga Ora are both charged with lead roles in developing the environmental, cultural, economic and social wellbeing of current and future generations. Both have primary roles in urban development and the infrastructure provision needed to enable this to occur.

Opportunities for local authorities and Kāinga Ora to achieve their purpose will be enhanced if the requirement to collaborate and engage is explicitly stated in the Bill.

Apparent exemption for Kāinga Ora in respect of development contributions

The DCWG request that the Bill explicitly provides that Kāinga Ora (through the development it undertakes) be subject to development contributions.

A central operating principle of Kāinga Ora is to have well-functioning urban environments by ensuring its urban development contains quality infrastructure and amenities.

By virtue of being a crown entity, Kāinga Ora will be exempt from paying development contributions.

If this exemption is enacted... a primary source of funding for new urban development infrastructure would not be available. The implications of such an exemption may be far reaching.

Fiona MacKenzie

The Bill is being rushed through despite lacking fundamental detail. Consequently, Treasury have been unable to determine the impact, cost, outcomes and risks of this legislation. It needs to have full consideration with development of possible alternatives, its reason for being, or possible ramifications. The extent of Kāinga Ora's power and the provision of checks and balances must be finalised before this Bill is passed. Rushed legislation is inevitably bad legislation.

Instead of addressing the very real impediments to progress and productivity inherent in the RMA and various Councils, the Bill creates Kāinga Ora so that select projects can override them.

[W]hile Kāinga Ora will not be subjected to these government-imposed problems, the rest of the community still will be. [Surely it would be more sensible to correct the identified problems](#) – the Resource Management Act and the Local Body legislation.

Where are the checks and balances to ensure that Kāinga Ora will always operate in the best interests of the entire community?

Gayle Souter-Brown

Overwhelming evidence links environmental design with health and well-being outcomes, educational outcomes and future prospects for the individuals who live in the space.

At the heart of well-being is the environment, where we live, work, play, go to school.

- Environment is associated with well-being (Ulrich, Simons et al. 1991, Kaplan 1995)
- Psychosocial and physiological effects of environment can be enabling or disabling (Hartig, van den Berg et al. 2011)

- 30 minutes once a week outdoors in nature is the minimum required for health and well-being (Shanahan, Bush et al. 2016).

Housing is a significant social health determinant. Environmental design, as in how and which materials are used / access to natural light / access from indoors to outdoors / views of nature, experience of nearby nature, and the wider environment in which the housing is set all interplay to create a health and well-being- promoting, or limiting, experience. Biophilic design and salutogenic design intersect with health architecture, to create an effective, low cost, high impact intervention.

By utilising biodiverse, sensory-rich environments around housing developments, that emphasise seasonal change, provide a local fresh food source, encourage wildlife (birds, butterflies, beneficial insects, pollinators) to visit, traditionally hard-to-reach individuals are engaged, encouraged and enabled to pursue healthy, active lifestyles.

Given the evidence base around the efficacy and cost-effectiveness of salutogenic design, it makes sense for Treasury to fund the most cost-effective, efficient, and impactful option.

Any new Housing authority, policy and practice, must be cognisant of the research base around the importance and impact of environmental design.

Being able to modify the environment is also important. Opportunities to grow food, move chairs and tables in or out of the shade, play and interact with the environment further effect well-being.

Garry Moore

The Community Housing providers in New Zealand are in every town, every City. To not have them mentioned in the legislation is a significant error. My request is that this be remedied.

[New Zealand has] experienced, since the 1980's, wild oscillations in [housing] policy. National Governments have been inclined to rely on the "market". Labour Governments have tended to bringing housing solutions inhouse. In my mind neither of these offer complete, or correct solutions.

Throughout the Community Housing Sector has continued providing services to those most in need.

The sector has always grown when Central Government has acted in a collaborative manner. It is essential that the spirit of this partnership is acknowledged in the Bill.

25,000 people are being housed within homes provided by the Community Housing Sector. [W]ould it not be a sensible to have somebody with an understanding of the CHP sector [on the Board]?

Hill Young Cooper Ltd

We support the intent of this Bill for the following reasons:

- all people are entitled access to good quality, affordable housing choices that meet diverse needs;
- the provision of housing should go beyond the provision of a house to also include the provision of safe, connected, and vibrant neighbourhoods;
- the traditional urban development model of turning rural land into suburban homes is insufficient (and inefficient) in meeting existing and future housing needs;
- providing choices about dwelling size, tenure, and typology (e.g. tiny houses) is key; and
- housing needs to be integrated with access to jobs, amenities and services.

We understand that the three primary actions the Bill takes to implement these outcomes is to:

1. combine HNZ and HLC with parts of Kiwi Build into a new entity - Kāinga Ora;
2. provide for a Government Policy Statement on urban development; and

3. provide for Kāinga Ora to undertake three roles:
 - a. build public housing
 - b. undertake development projects for defined urban areas
 - c. help co-ordinate and lead wider urban development.

[S]eparating methods from objectives may lead to some disjoint between the objectives of the new authority and the tools it has to implement those objectives. While the actions set out in this Bill are potentially positive, the overall framework needs to ensure that objectives are clear and that the appropriate range of tools are in place to implement these objectives.

We consider that the objectives should include:

- provision of warm, dry and safe housing;
- maintaining and expanding over time a stock of public and community housing that meets the housing needs of the most disadvantaged;
- promoting mixed, inclusive communities with diverse affordable housing choices across all neighbourhoods;
- good quality urban design of the associated public realm;
- environmental responsive, resilient, low impact (water sensitive) urban forms; and
- integration of land use with transport systems.

In addition to the above, the new authority should have the function of monitoring housing outcomes and investigating and implementing new tools and methods as need be.

To influence and co-ordinate market-led development so that it contributes positively to housing choices and housing needs, there is a need for a range of 'market shaping' tools such as:

- Inclusionary Zoning;
- value capture; and
- land re adjustment, to help address issues of land fragmentation.

[Clause 14 – Operating principles should be expanded to] identify the principles that should apply to all forms of urban development undertaken by Kāinga Ora, and urban development projects where the authority takes a leadership role. [T]he sub-section headed 'well-functioning urban environments' needs to be amended to allow the authority to implement the objectives in clause 12.

For example, principles could include:

- Influencing ... markets to support provision of quality, affordable homes;
- Emphasising urban intensification
- Taking a long-term view of housing and urban outcomes
- Building in resilience to natural hazards
- Ensuring land use and transport infrastructure are mutually supportive.

Heritage New Zealand Pouhere Taonga

The protection of historic heritage from inappropriate subdivision, use and development must be recognised and provided for as a matter of national importance under the RMA. Heritage NZ advocates for recognition and provision for historic heritage in planning and statutory documents.

Heritage NZ is encouraged by the inclusion [of principles relating to Stewardship and Sustainability], however [we] consider [*' - operating in a manner that recognises environmental, cultural, and heritage values and that mitigates the effects of climate change*] does not provide strong direction with regard to protecting cultural and heritage values.

Housing Action Porirua

Kāinga Ora brings together two conflicting interests: the provision of state housing and facilitating private development and market housing. [B]oth contend for the use of public land. We maintain that the government should only be concerned with the use of public land for public housing.

There must be a stronger commitment to not only maintaining but growing public housing stock. With a housing crisis and record low number of state housing, the government's role must be to provide more. State housing is the only guaranteed affordable housing for beneficiaries and low-income workers. We urge the committee to adopt an anti-privatisation clause.

We do not want to see the gentrification of Glen Innes, Marfell, or Pomare to be replicated in... other low-income communities. We urge the committee to adopt an anti-gentrification clause.

We support the explicit statement of the Crowns' responsibility to consider and provide for Māori interests. However, we recommend that all references to Māori interests be made clearer to recognise the different relationships and responsibilities of mana whenua and maata waka.

[W]e believe ... "perspectives of developers" should not have equal weight as Māori or public housing tenants' perspectives [on the Board]. [T]he people whose communities are being developed should have the ability to elect board representatives. The Clause should be amended to provide for at least two specific roles to be filled by mana whenua and elected representatives.

Clause 17 gives individuals at Kāinga Ora the powers to define what is relevant to financial eligibility based on discriminatory or harmful preconceptions. We recommend that the wording be changed to safeguard against this possibility.

[I]t is unclear how communities will ... have input to the GPS. [We] believe that there must be a clear process for those who will be affected to have their needs and views incorporated into the GPS.

An independent committee should be established that monitors the housing work, including whether the GPS is being carried through, the rigour of engagement and participation with mana whenua and maata waka, and to regulate privatisation and gentrification.

Infrastructure New Zealand

[We] consider that the Entity:

- should only step in where there is clear evidence of market failure
- should avoid crowding out private development
- should seek to promote development partnerships with local government and the private development sector wherever possible.

The objective of Kāinga Ora-Homes and Communities should be to cut through local governance and market barriers where they exist and ensure that national objectives are promoted as set out in the regulatory impact statement, including enabling:

- faster economic transformation through more effective, large-scale urban development
- better integration between land use and transport systems
- more control over the location, timing and quality of urban development
- increased planning certainty and incentive for developers to participate in largescale urban development
- increased access to private sector investment in urban development through joint ventures and partnership arrangements between the public and private sectors
- better return on public sector infrastructure investment.

We are concerned that the Bill does not clearly state these objectives.

The functions that Kāinga Ora will undertake will require substantial capability in the provision of housing and urban development. We are concerned that the description of core competency gives insufficient weight to the need for extensive urban development experience on the board.

In the long term, we would expect that a system which is not providing for national priorities is reformed, rather than local functions or market activities be consumed by a national body.

It is our strong view that the institutional and statutory arrangements for local decision making in New Zealand are not working and that these arrangements are directly contributing to issues in housing, transport, water and land development, among others.

Our preference is that the legislation overseeing these activities, specifically, the RMA, the Local Government Act 2002 and the Land Transport Management Act 2003, is revised.

He Kāinga Oranga/Housing and Health Research Programme & NZ Centre for Sustainable Cities based in the Department of Public Health, University of Otago, Wellington.

Ensuring all New Zealanders can access good quality housing in sustainable communities that support their health and wellbeing is critical. We believe this Bill enhances the capability of the government in partnership with Māori to consolidate and coordinate central and potentially local government policies on public and affordable housing and urban form and sustainable development.

Regarding the role of 'Being a public housing landlord':

- the government's commitment to being an exemplary public housing landlord that sets standards for private landlords could be made clearer;
- greater focus could be made on security of tenure for public housing tenants as an essential part of the picture of quality housing, [and] the importance of safety in housing quality...

Regarding the 'Kāinga Ora—Homes and Communities' function in urban development, it is stated that it will provide a leadership or co-ordination role in relation to urban development, but does not discuss any intention to include any development of Kāinga Ora—Homes and Communities' own research capability. **It should be clear that Kāinga Ora will critically evaluate its initiatives.**

We request that in the development of each GPS, a review be undertaken on any new research that has been generated into different urban development models ([local] and internationally). We believe this is important to show how the ... system under Kāinga Ora is responsive to research.

[We] encourage inclusion of 'taking into account the current and developing body of evidence and research about how Māori interests are met with current models of delivering housing' (Section 4(c)). This includes [The Housing Policy and Services Kaupapa Inquiry \(Wai 2750\)](#) currently at the preparation stage, as well as the Kāinga Strategic Action Plan published by the Independent Māori Statutory Board. [T]hese represent significant consultation on many issues [relating to this Bill].

[For] the improvement of health and wellbeing of Māori, who remain disproportionately affected by poor housing, recognition and development of these and other pieces of work driven by Māori and their concerns will be critical in ensuring that Kāinga Ora honours the role of ... Te Tiriti partner.

We believe that to ensure that Kāinga Ora remains committed to supporting community wellbeing, it is important to also include knowledge and experience of, and capability in health and public health, as well as sustainability.

[T]o deliver urban development that will deliver diverse communities in a timely way, it is important to support innovation, capability and scale in the wider... development and construction sectors.

[M]ental and physical wellbeing of current and future generations need to be more explicitly recognised as part of Kāinga Ora' operating principles. We recommend the following amendments:

- Section 14(1) - 'In performing its functions, Kāinga Ora must contribute to the social, economic, environmental, cultural and physical and mental wellbeing of current and future generations.

Mangere Housing Reference Group

The recent Mangere Development driven by HNZC and HLC, while necessary, has created real stress, uncertainty and even fear for many of our residents. Truthfully and in our view, this Mangere Development has not started well as it could have.

Guardians Group

The primary purposes of this Guardians Proposal are:

- i. The MHCRG requests the Minister of Housing to support the establishment of MHCRG as the official and ministerially appointed and recognised community Guardians;
- ii. The primary role of the Guardians will be to work alongside HLC, HNZ, local mana whenua and other key stakeholders at a strategic level to achieve an excellent and holistic regeneration project, [with] widespread support of people living in the area.

Purposes of Kainga Ora – We submit that central to the two key purposes for Kainga Ora in the Bill must be a community focus. In particular, the second key purpose of coordinating urban development projects is directly relevant.

We acknowledge that this is somewhat codified in Section 13 of the Bill. *But we do not want other communities to go through what we have gone through... Therefore having groups like ours working alongside Kainga Ora right from the start at strategic levels in our view reduces damage locals face.*

Kainga Ora Board – We submit that key community representatives who have the governance, housing and community skills should be appointed to this Board.

The Community Housing Sector cannot be ignored in this change towards Kainga Ora.

Innovative and strategic relationships with local groups from these communities is crucial. This needs to be robust, sustainable, resourced and real.

Increased Bureaucracy – We hope that this entity does not increase the bureaucracy and systems that community members have to navigate for social housing provision. These processes are even more important under the urban redevelopment function of Kainga Ora where social housing tenants are displaced and moved from their existing houses.

New Zealand Airports Association

NZ Airports is concerned to ensure that the framework and principles set out in the Bill... take into account and do not undermine the existing protections for airports. The effects of urban development on airport operations must be appropriately considered.

The location of urban development is key to the provision of good quality and healthy housing for the well-being of residents. In relation to airports, it is well recognised that developments placed within areas subject to the effects of aircraft noise may not achieve good quality or healthy housing.

New Zealand Institute of Architects

The goal of the Kāinga Ora – Homes and Communities Bill is, “to contribute to sustainable, inclusive and thriving communities”. [T]his goal is laudable, as far as it goes – but it does not go far enough.

[A] more fundamental issue lies in the Bill’s treatment of the relationship between the provision of housing and the successful development of communities, or what it also calls urban development. The Bill approaches these two aims as discrete objectives that must be reconciled, rather than as part and parcel of the same issue: a challenge that requires an integrated solution.

The Bill should be ambitious and recognise that the Kāinga Ora Bill, in the scale of its investment, is about making places, and its purpose is to make better places. Kāinga Ora is about bringing people together to shape better cities, towns and neighbourhoods across New Zealand. People, place and the security of tenure should be the framework established by the Bill.

The Kāinga Ora Bill is an opportunity to effect qualitative as well as quantitative improvement in housing and infrastructure – to provide inspiration as well as amenity.

By separating the building of homes from the development of communities, that is, by isolating an individual frame from the larger picture, Kāinga Ora threatens to revive the type of development we thought was consigned to history - post-war dormitory suburbs that lacked infrastructure.

The Bill should own its intention to create great places for New Zealanders, and great places – neighbourhoods and communities, towns and cities – rarely happen by chance. **Internationally, it is recognised that the quality of place influences individual and community well-being.**

Housing is physical infrastructure and communities are social infrastructure; the Bill should seek to ensure that all infrastructure is planned, coordinated, efficiently financed and delivered.

The Bill is characterised by a tentativeness that indicates a reluctance to aspire to real innovation in the quality of housing and the shaping of communities.

[The] Bill... is surprisingly silent about where necessary design leadership, advice and policy is going to come from. Kāinga Ora's goals require sophisticated design thinking. Where is this high-level, joined-up thinking... ? Who will have responsibility for converting ... ambitions into designed reality?

A dedicated design office and capability is fundamental to the Bill and GPS.

'Urban planning and design' is one area of 'knowledge, experience and capability' that must be represented on the board. However, this competency is only one of nine identified.... It is... too much to expect a solitary board member to compensate for the lack of executive or operational design experience in an agency with such an ambitious remit.

Well-designed built environments are healthy, responsive, integrated, equitable and resilient. Is this what the Bill envisages under the definition of 'quality'? If it is, the Bill should say so.

"Promoting good urban design" positions Kāinga Ora as a cheerleader for good design, rather than as an agent and setter of benchmarks. A Crown Entity responsible for the creation of new places and communities should demonstrate good practice and be required to continuously improve.

[D]esign is not an 'optional extra' or add-on, but an essential process extending from vision to project completion. The proper observance of such a process will deliver value for investment and value for communities. An alternative expression of this clause is: "promoting best practice in urban and community design and development, having regard to access to transport and other services, and innovations in sustainable development".

We suggest it is advisable for the legislation to reference "built environment" or "better places" rather than "urban development". [U]rban development is often perceived as creating winners and losers. *A reference to better places and the built environment [implies] a more inclusive outcome.* It is a reasonable expectation that a place must be improved by the performance of Kāinga Ora.

Built Environment Commissioner

The Commissioner's role would be to review and provide advice on the built environment and the system of agencies and processes established by the Government to manage the built environment, as identified and prioritised in the GPS. The primary objective of the office would be to contribute to maintaining and improving the quality of the built environment through advice [to various parties].

Be ambitious and embrace, people, place and neighbourhoods as the focus of Bill and in its title.

New Zealand Nurses Organisation

[O]ur primary focus on the Bill is the impact of suitable housing on the health and wellbeing of all New Zealanders. A key factor [is] addressing of significant health inequalities, underpinned by the impacts of poverty and the lack of affordable and appropriate government housing.

- Urgent work is required of the Bill with regards to its obligations to respect, and acknowledge the te Tiriti o Waitangi relationship, and to act as treaty relationship partner;
- Clarity is required with definitions used in the Bill, such as “Māori interests”, “partnering with Māori” and “protections for Māori interests”, rather than using consistent treaty partner wording which recognise the status of mana whenua as treaty partners;
- We recommend that mandatory cultural competency training should be available and required as part of te Tiriti o Waitangi obligations for all staff

Recent research has indicated that the importance of the dwelling as a platform for well-being, independence and social connectedness increases as people age. Further research indicates... an increase in poverty in Aotearoa New Zealand and a decrease in accessible, affordable government housing, has led to an alarming increase in ... severe housing deprivation (homelessness).

We recommend that a Health Impact Assessment (HIA) tool is used to ensure that unintended consequences of this Bill, including any future urban developments, must not negatively impact or contribute to further inequities on the social, economic, environmental, and cultural wellbeing of current and future generations.

Public Service Association

[A] reinvigoration of New Zealand’s public housing approach is needed... [including] significant capital investment. **Public and social housing are critical components of our social and economic infrastructure and play a vital role in ensuring the health and wellbeing of our citizens and our communities.** Decent, affordable and secure public housing can help overcome inequalities.

We welcome the commitment ... to strengthen the role of central government in the planning and co-ordination of housing and urban development. The merger of HNZ, HCL and parts of the Kiwibuild programme into one agency with housing and development powers is a positive step.

Most of the Housing NZ members surveyed as part of this submission thought that the creation of Kāinga Ora-Homes and Communities would help address current housing challenges.

The PSA strongly welcomes the commitment expressed in clause 4 of the bill to “consider and provide for Māori interests”, in particular the requirement in 4(a) that the new agency “uphold the principles of the Treaty of Waitangi (Te Tiriti o Waitangi)”.

We question however the rationale behind clause 10(2)(g) which recommends Board members with expertise and experience in “business generally”, particularly given that the perspectives of the construction industry and developers are covered. **Membership could ...be strengthened by people with experience in community development and citizen engagement.**

The PSA supports a significant increase in government investment in public housing. The bulk of this investment should go to the building of quality state housing. **However, the state should also work collaboratively with local government, Iwi, other Māori organisations and the community non-profit sector to support both building and tenant care programmes.**

We are disappointed that this bill doesn’t signal an expansion of the state housing stock, but [retains] the residualist approach highlighted by clause 13(1)(a) which stresses that the function of the new agency is to “provide rental housing, principally for those who need it most”.

The residualist approach to public housing provision has restricted access to state housing to only those in the very highest need, leaving others to rely on a private housing market.

The PSA strongly supports the operating principles expressed in clause 14, and in particular the responsibility of Kāinga-Ora to contribute to the “social, economic, environment, and cultural well-being of current and future generations” (14(1)). **In order to achieve this ... the new agency will need to significantly increase the supply of affordable state housing.**

New Zealand Planning Institute

We are concerned that the first framework legislation (contained in the Bill) does not ... establish the ground rules for the relationship that is expected between local government and KHC. [T]he Bill does not adequately address the risks and inefficiencies that will result from a confusion of roles and responsibilities. This will potentially add costs to local government and create significant inequity within communities, including on the demand for infrastructure.

[The] Bill should have much greater recognition of the significant overlaps that exist between the functions of local government and those of KHC, and that the functions and operating principles of KHC be expanded to ensure that collaboration and agreement be the normal relationship expected [and] options such as “veto power” or “means to proceed” are exceptions to that norm.

NZPI is concerned to ensure there is legislative clarity in respect to the various laws and statutes that may need to be had regard to, or given effect to, by planners or other professionals when carrying out their duties in relation to plan making and development application processing and preparation.

New Zealand Council of Christian Social Services

This Bill makes significant changes to the core entities involved in providing affordable rental housing as well as affordable home ownership, for tens of thousands of people. It is a vital opportunity ... to create a robust framework for sufficient supply of good quality affordable housing in the long term.

NZCCSS supports the clear obligations created in the Bill to support the aspirations and wellbeing of Māori and operate in a manner that upholds Te Tiriti o Waitangi.

It is a signal of failure for current housing policy that Māori are disproportionately represented amongst the homeless and on the waiting list for public housing tenancies. In addition, the home ownership rate for Māori is much lower and declining faster than for non-Māori.

It is troubling to read the Bill and accompanying policy papers and find little or no reference to the Right to Housing. We believe this is a significant omission. NZCCSS recommends that the Bill include clear reference to the Right to Housing. This could be achieved through ... the principles [and] requiring the Right to Housing to be referenced in the GPS.

NZCCSS supports the development of a GPS on housing that can become a clear and ongoing reference point over the long term. The lack of any overarching strategy for housing has greatly hindered attempts to respond to the housing crisis.

Preparation of the GPS must involve widespread and genuine consultation with affected communities.

NZCCSS recommends the Bill include clear reference to the role of community housing providers alongside and complementary to the role of the state-owned housing provider. We note the concerns raised by NZCCSS member agencies who are registered providers about how the changes proposed to the Housing Restructuring and Tenancy Matters Act 1992 will affect them.

We support the recommendation from Community Housing Aotearoa to include specific reference to registered community housing providers in the definitions and other appropriate clauses.

The dynamic and growing not-for-profit community housing sector is an ideal partner and collaborator with government in meeting the affordable rental and home ownership challenges.

NZCCSS recommends the Bill include requirements for meaningful engagement with NGO and wider communities across the whole planning and development process.

Planalytics

We recommend that definitions of “economic, social, environmental, and cultural well-being” be included in clause 5 of the proposed Bill. They should be clarified for the purposes of transparency and consistency. For example, where does mental health fall within the four listed well-beings?

We recommend that clause (13)(1) be updated to include a sub-clause under ‘Housing’: “to support organisations, including but not limited to local government and community housing providers, who also provide housing solutions for people in need”. This would recognise the role of other housing providers and create a clearer mandate to work across the sector [per clause 14(1)(k)-(m)].

We recommend that clause (13)(1) be updated to include a sub-clause under ‘Urban development’: “to work closely with local government to understand, enable and support the activities of local government in relation to urban development and growth planning”. [I]t would be advantageous for Kāinga Ora to work with local government, rather than duplicating or working in isolation.

We support the development of a GPS on housing and urban development, however, are concerned that 12-months is not a realistic time period. Meaningful consultation requires time.

It is strongly recommended that a sub-clause be inserted as follows: “monitor the performance of the GPS by consulting widely with local government, communities, and other stakeholders. The outcomes of this monitoring shall be made publicly available and will inform the updated GPS”.

Property Council New Zealand

There are many issues holding back the property industry and these are not new. They stem from a mess of perverse incentives facing growth councils including; debt limits, infrastructure financing problems, and difficulties with the RMA processes and district plan requirements.

Kāinga Ora will not solve all the complex issues but is a good step in the right direction.

We support government involvement in the establishment of urban development projects as these cannot exist in isolation and must integrate well within the wider community. Government needs to be involved in infrastructure-related decision-making because it is a critical enabler. Central government was [involved] when New Zealand was keeping pace with our growth.

We hope that [Kāinga Ora] will become a powerful delivery entity, co-ordinating urban development projects that provide a mix of public, affordable, and open-market housing throughout the country.

The consolidation of these agencies will help to reduce the complexity and improve co-ordination by integrating the full government development programme. A rationalised procurement process across government will likely give the property sector more certainty and scale to reduce costs.

Kāinga Ora needs to ensure that it complements and partners with the property sector. Kāinga Ora can de-risk large-scale developments which are too complex for the property sector on their own.

We strongly support Kāinga Ora acting as the master planner, streamlining the resource consent process and investing in infrastructure.

While we appreciate that Kāinga Ora will be a Crown entity which will need to follow government policy, we hope that the structure and priorities remain stable over future governments.

We support the proposed General Policy Statement on Housing and Urban Development (GPS). This will likely provide more certainty to the property sector by setting out an overall direction.

[T]he GPS needs to take a more integrated approach to New Zealand's infrastructure planning.

Government needs to speak with one voice, and ensure the policy set by the Ministry HUD and other government departments complements the outcomes sought by Kāinga Ora.

Auckland Anglican Diocesan Social Justice Group (SJG)

The Auckland Anglican Diocesan Social Justice Group (SJG) continues to be greatly concerned about the increasing need for affordable, warm, dry, safe rental housing for homeless and low-income people.

[A] vibrant civil society at the local level is critical to healthy communities and the well-being of society as a whole.

We believe it will be critically important interventionist central government programmes hold respectful relationships with hapu and iwi, Local Bodies and local communities. We hope the [UDA's] sweeping powers will be used accountably, sparingly and for the shortest time possible.

We invite the Select Committee to lay the groundwork for two priorities:

- honouring the status and wisdom of Māori; and
- upholding the poor and marginalised.

We encourage the government, Local Bodies, the private sector and developers to have significant partnerships with hapu and iwi and to respect their rangatiratanga in areas important to them.

We invite Kāinga Ora Homes and Communities to balance national and regional interests with a commitment to equity by:

- supporting a very urgent central government-initiated programme of upgrading and constructing state/public housing;
- supporting emergency, transitional and Housing First initiatives;
- supporting initiatives to meet the needs of the working poor;
- raising the percentage of state and affordable houses in 'mixed' areas above two thirds;
- supporting Community Housing Providers affordable housing initiatives such as KiwiBuy but without the sale of Crown/state/public land to the private sector or developers;
- supporting other emerging models such as shared equity in which land is leased in perpetuity and plays a pivotal role in community stability, and similar community-based co-operatives.

Concerning the Urban Development section - (f) (i) we re-iterate... priority needs to be for those who are in most need of affordable, warm, dry, safe rental housing including small and large families, people living with disabilities or mental illness, single people and the elderly.

Susan Short

I support the intention of the proposed new Crown agency, Kāinga Ora Homes and Communities, to deliver cost-effective, well-built, liveable housing near jobs, services and amenities.

What I do object to is the inclusion of the race-based initiatives in the bill. A fair Crown entity would not embed racial privilege but would treat all New Zealanders as equals, regardless of race, gender, religion, or any other defining feature.

This new Authority will have considerable powers to implement much of the Government's housing and urban development agenda. By partnering and having early and meaningful engagement with Māori, as the bill states, this specific group of citizens will play a disproportionately influential role.

The Royal Australasian College of Physicians

Housing is a social determinant of health – when housing is of poor-quality health and wellbeing are impacted.

The Bill signals positive changes to ensuring health and wellbeing are functions of the State public housing provider. “Warm, dry and healthy” public housing and an emphasis on tenants leading “lives with dignity” are applauded.

The commitment to the needs and rights of Māori for housing is positive.

This Bill and other legislation focused on wellbeing would be strengthened by a consistent definition of wellbeing across government activity.

In 2017, the RACP launched its #MakeItTheNorm campaign, calling for Healthy Housing, Good Work and Whānau Wellbeing to be the norm for all people, whānau and communities in Aotearoa New Zealand. Our campaign title drew on Prime Minister Norman Kirk’s famous words – “All people want is somewhere to live, someone to love, somewhere to work and something to hope for”.

The RACP sees housing, good work and whānau health and wellbeing as key determinants in achieving health equity. Ensuring our homes are warm, dry and safe for children and all whānau members is a core component, as healthy housing encompasses both the physical and social environment of a home. Homes must be insulated, able to be ventilated and control for moisture and dampness.

Kāinga Ora’s focus will not only have healthy, affordable housing as a central tenet, but also contributing to the development of sustainable, thriving communities that promote wellbeing.

[B]uilding holistic understandings of the critical importance of the integration of housing and urban development is essential. The desired integration – resulting in homes and communities which are health-promoting, safe, accessible and connected – must be understood and supported across government departments, between central and local government, and by society.

Public housing should be health-promoting, not health-impacting.

The RACP calls for communities and urban environments to be health-promoting: offering children, parents, young people and older people the opportunity to navigate their neighbourhoods through active transport and enable effective and accessible public transport links.

A health-promoting community enables citizens to live healthy lives and maintain healthy lifestyles.

Healthy communities meet the basic needs of citizens, are committed to the quality and sustainability of the environment, have adequate levels of economic and social development, health and social equity, and facilitate relationships that are supportive and respectful.

The focus on effective partnership and collaboration with Māori [is] a welcome priority in Kāinga Ora. The College supports a needs and rights-based approach to achieve Māori health equity, as evidenced in the persistent disparities in health outcomes experienced by tangata whenua, and the guarantee of the right to health for Māori under Te Tiriti o Waitangi and the United Nations Declaration on the Rights of Indigenous Peoples.

The Bill is evidence of the work signalled by the previous Minister to enshrine the Crown’s social objectives in legislation. There is alignment between the functions of Kāinga Ora as outlined in the Bill and the social objectives of Housing New Zealand as identified by the Minister.

Wellbeing is a difficult concept to define, and difficult to measure progress against. We find there is little consensus on what the government means by wellbeing.

The Salvation Army New Zealand Fiji Tonga and Samoa Territory

The Salvation Army overall is supportive of this new approach to housing and urban development issues detailed in this Bill.

There are specific aspects we seek further clarification in, or areas that we are somewhat concerned about. This includes Kāinga Ora Homes and Communities' (KOHC) function as coordinating urban development projects which we submit needs further refining and safeguarding to ensure specific communities are not damaged by these kinds of projects.

We also want to stress the importance of having capable and connected people on the Board.

The move to centralise key housing policies and programmes under KOHC is a positive move. The Salvation Army has been critical of the lack of coordination and disjointed nature of housing policy development and housing provision from the Government.

We are supportive of the general provisions of the Bill, including the two key stated purposes of this new Crown entity, the requirement to recognise Maori interests, and establishment of the Government Policy Statement (GPS).

[O]ne of the key areas of this Bill is the need to have strong and effective governance. The Salvation Army consequently submits that the performance of this entity is unlikely to be effective if this new Board does not have specific governance and housing-related skills.

The Board, in our view, requires real innovators, disruptors and broad thinkers that are connected to the community, particularly those living in social housing. They should not be political appointments.

[I]t is critical to keep communities at the core of these redevelopment projects. We have had recent lessons where this kind of redevelopment has ... created real distress for the local communities.

We do not want to see gentrification and the damaging of communities through these ... projects.

HNZC and HLC are not community experts. HLC are developers, not a community engagement agency. [G]reater connection will be required between KOHC and the affected communities to guarantee these projects do not damage these long standing and proud communities.

[E]nsuring existing communities are not adversely affected and [introducing] community mixing [could be pursued through];

- Innovative community engagement approaches such as the Mangere Guardians Proposal;
- Creative use of policy settings such as first right to buy policies for true locals in these areas for Kiwi Build and private build houses in their area; and
- Connecting schemes like Kiwi Buy (promoted by The Salvation Army and other community housing providers) and other shared equity schemes.

[W]e submit that this entity has some clear lines of accountability all the way up to the Ministers in charge so that local communities are not confused or intimidated by this new large entity and complex Ministerial arrangements.

[W]e advocate that [co-investment with others interested in urban development] is done in ethical ways that is as least harmful to those local communities.

At the same time, we submit that co-investment with the community housing providers already operating services, products and programmes in these local communities is crucial to securing systemic change around our housing problems.

We submit that as per section 24 (a) and (b), any overall direction setting for redevelopment priorities or projects should be done in collaboration with key community housing providers that are working at the coalface with local communities.

The redevelopment agenda of KOHC must be ordered, ethical and have communities and families at the core of their thinking and plans. We submit groups like The Salvation Army;

Habitat for Humanity, Community Housing Aotearoa, the Housing Foundation and others should help shape this agenda and the main community priorities.

Course Rausch, Victoria

The submitter supports the intent of Kainga Ora – Homes and Communities Bill aimed to facilitate residential and community development [and] agrees with the philosophy of the Bill to provide a long term and positive outcome that addresses the current housing inadequacies. In conjunction with the concept of ensuring equitable provision of accommodation and housing services for those in need of assistance.

The provision of quality, warm, dry and healthy homes is an essential component... because living in quality homes has a direct correlation and impact on the physical and mental wellness of the people who reside within.

[A] factor that is missing in this definition is that homes also have to be well designed. WHO analysis of European housing and health status study (2004) confirmed an [increased prevalence of mental health symptoms as a result of poor design](#).

These factors include missing daylight, bad views from buildings, noise disturbance and inadequate privacy perception. [Well-designed homes will minimise the square area necessary for each build due to clever use of space... reduce the construction materials required, increase privacy levels and be sustainable into the future.](#)

If we consider that a person home is their castle then when the outside world intrudes within the home through noise, scrutiny or intrusion then the protective factors of the home are reduced.

Social capital should be paramount when designing new housing developments. It is increasing the social capital within each community that will either ensure a successful thriving society....

Social capital is closely related to social connections... [which] imbue a sense of belonging and connectiveness. [As people benefit from interactions and relationships, social connections to other networks offer benefits to individuals](#) (Campbell, Wood & Kelly, 1999).

[Networking can facilitate access to diverse information and knowledge](#). It can also expose people to the wider sense of community therefore enhancing individual feelings of belonging.

Social connections link individuals and groups together through common activities, characteristics or pursuits. These connections are about the strength that we gain from being connected to others who are similar to us. Conversely, creating diverse communities can be achieved by placing people in contact with persons disparate to themselves, and with beliefs and behaviour unlike those with which they are familiar. Consequently, this encourages collaboration across social groups that will grow into tolerance of diversity and build trust.

Being a multicultural society, the New Zealand norms and values system consists of diverse cultures. Social capital is about bridging relationships that enable people to work together across cultural differences (Frieling, 2018).

[T]he social model of disability ... views the barriers that society presents as the main cause of disability, including environmental, architectural and social mechanisms. It is not sufficient for a person to have merely access to a building, dwelling or environment. They need to have complete access to their residential environment.

[It is a person's involvement in Activities of Daily Living that enhance concepts of independence, autonomy, and self-actualisation](#). When these activities are limited is not beneficial for well-being. People require homes that are adapted to their needs and sustainable long term.

WHO (2018) shows that it is cost effective to build adaptive homes from the outset rather than modifying later on. If a reduction in institutionalised care can be made then the adaptive modifications will pay for themselves.

In order for social capital and thriving communities to be a priority then security of tenure needs to be at the forefront of decision making.

There is a need to create housing policy and housing programmes that are aimed at ensuring equitable outcomes for those with disabilities.

Worldwide the positive effect of home ownership has been shown to enhance social capital and citizenship. When people own homes they are less likely to move so they invest more into those around them by building connections with their neighbours. Mixed zoning has been shown to work well as it encourages a diversity of residents (McCulloch, 2003).

People need to know they have security of tenure for all occupancy types.

If people feel secure within the community they will form friendships, make connections and community cohesion will result.

The submitter recommends that Kainga Ora Homes and Communities Bill is utilised to provide **solutions to the current housing crisis through the provision of a formatted and organised process.**

New Zealand requires well designed, quality homes that ensure privacy and security of tenure for the occupants.

The proposed housing developments call for a mixture of tenanted and owner-occupied properties that cater for diverse needs.

Additionally, consideration needs to be given to homes which are adapted to suit people with functional limitations. The removal of environmental barriers within the home should reduce the inequality that people with disabilities struggle within their daily lives. Consequently, the capacity to participate in essential life activities will increase therefore enhancing independence, dignity and the quality of life.

Kainga Ora – Homes and Communities should be **planned** to maximise opportunities for tenants to be well connected and build strong social networks that enhance social capital and a sense of belonging. The enrichment of social capital within communities will boost the health outcomes and will promote well-being for current and future generations.

Wellington Regional Healthy Housing Response Group (RHHRG)

The RHHRG was established to support a collaborative, regional approach to healthy housing in the Wellington region: “Everyone in the Wellington Region lives in warm, dry and safe housing by 2025”.

Housing is an important underlying determinant of health, with housing quality and household crowding playing a major role in health outcomes. Poor living conditions, including dampness and crowding, are significant risk factors for acute rheumatic fever. Housing is contributing to hospitalisation and re-hospitalisation rates for children, notably for respiratory infections.

Given that policy and legislation significantly affect housing quality and housing supply, a coherent approach among all the agencies involved ... will have better impact and avoid duplication.

The Bill successfully looks beyond the provision of houses to the importance of community and recognises the role urban development can play in creating both homes and communities.

Reorienting the work and role of Housing New Zealand (HNZ) towards to do this will be a positive step forward for both clients and Aotearoa as a whole.

[T]he current ad hoc urban development is struggling and unable to deliver the very real need of people, particularly the vulnerable, for secure tenure, allowing them to live within a supportive community and close to services.

Critical to the success of Kāinga Ora is the building of meaningful partnerships, consultation at the community level and clear and timely communication with stakeholders.

This Bill is primarily concerned with a structure of a new entity with good intentions for improved, joined-up urban development ... [I]t remains to be seen how this will work in practice and will require workplace culture change of those moving from working for HNZ to working for Kāinga Ora to ensure an organisation and team who prioritise people and partnership.

RHHRG deliver the Ministry of Health's Healthy Homes Initiative programmes ... the experience is that the effectiveness relies wholly on staff engagement – high turnover does not help. RHHRG recommends that Kāinga Ora have strong engagement and high-level buy-in with relevant programmes and services available.

[T]he process of disestablishing HNZ and establishing Kāinga Ora will have no direct impact on current tenants, it is likely even the change of names and appearance could cause some stress and concern among tenants. RHHRG requests that a considered effort is made to communicate in a timely manner to relevant stakeholders and particularly with tenants to explain clearly the changes that are happening.

Wesley Community Action

Recommendations:

1. Porirua Promise should be developed – it would promise that:
 - locals stay in their community,
 - employment, education and upskilling for locals, and
 - that pathways to home ownership are built.
2. Some resources must be ringfenced in the redevelopment \$1.5 billion into community engagement
3. Set up a Crown recognised kaitiaki group of community advocates. The group would be a well-resourced cross sectional, diverse group who would walk alongside the development bodies. It would maintain an independent voice on the progress of the redevelopment, and impacts on the people and environment of Porirua.

Collaborative learning trip to South Auckland in May 2019: We worked in partnership with Wesley Community Action, Inspiring Communities and a cross-section of people and groups active in the Porirua community.

Key insights:

- A clear commitment to local people is a useful tool – e.g. the Tāmaki Commitment
- There are opportunities for local jobs and procurement, but these require support to get off the ground
- Local, whānau centred design will give us solutions that empower local people
- The intergenerational and large families in our community need houses that will accommodate them
- Home design should include good sized communal areas, built in storage and secure front areas (to keep children safe from running on the road)
- There are different ways to design homes, having Māori and Pacifica architects involved could help to ensure the homes meet the needs of our whānau

- There is a spectrum of housing, it goes from emergency housing, to social housing, through to different models of home ownership like shared equity and rent to buy schemes. We need homes available at all different stages of the spectrum, so that people are able to move up it
- There is a need for a formalised relationship between government and the community – a way to ensure that community voices (not just the loud ones) are involved, heard and acted on
- There is lots of unavoidable grief and loss as part of the regeneration process – how can we support our community to work through this?

- We need to design for a future that we struggle to imagine. Climate change and automation will change the way we live

- We can dream big! If the community wants something, we can work to make big things happen