

Government Policy Statement (GPS) on Housing and Urban Development Ministry of Housing and Urban Development (MHUD)

Te Ope Whakaora – The Salvation Army New Zealand, Fiji, Tonga, and Samoa Territory

Executive Summary

1. Overall, The Salvation Army is **supportive** of the vision, outcomes, focus areas and ways of working presented in the GPS Discussion Document. We have engaged regularly with MHUD’s consultation process, offering our views, insights, and challenges consistently throughout this process. We believe that MHUD has generally landed on a good, balanced GPS to shape housing and urban development in New Zealand.
2. This submission will highlight some key general responses that we have to the draft GPS. It also includes some specific comments to various parts of the GPS framework offered by MHUD.

Background

3. The Salvation Army is an international Christian church and social services organisation that has worked in New Zealand for over one hundred and thirty years. The Army provides a wide-range of practical social, community and Christian faith-based services, particularly for those who are suffering, facing injustice or those who have been forgotten and marginalised by mainstream society. We are passionately committed to our communities as we aim to fulfil our mission of caring for people, transforming lives, and reforming society by God’s power. We have over 90 Community Ministry centres and Churches (Corps) across the nation, serving local families and communities. This service covers numerous Christian spirituals and social (addictions, social housing, prisoner reintegration, foodbanks, social work, community finance, financial mentoring, and budgeting and many more) services across the nation.
4. The Salvation Army has multiple responses to the housing challenges facing those using our services. In recent years, we have joined other community housing providers (CHPs) and commentators in the Kiwi Buy initiative.ⁱ In terms of service provision, we have our Salvation Army Social Housing unit providing long-term affordable rental options throughout the country, recently opening developments in Botany and Westgate in Auckland.ⁱⁱ We also offer transitional housing options, sustaining tenancies support, post-prison housing and support, homelessness support services, and wider wrap-around initiatives. Additionally, the Social Policy and Parliamentary Unit (SPPU) provide social policy advice, research and advocacy on housing and several other critical social issues. Overall, given our mission and the people and whanau using our services, our work usually focusses more on those on the ‘sharper’ end of the housing continuum, particularly those who are homeless, or living in overcrowding situations, or in emergency, transitional or social housing.
5. This submission has been prepared by the SPPU of The Salvation Army. We have also sought feedback from other parts of our organisation providing social houses or delivering housing-

related support services. This submission has been approved by Commissioner Mark Campbell, Territorial Commander of The Salvation Army's New Zealand Fiji Tonga, and Samoa Territory.

Key areas of emphasis from The Salvation Army

6. As mentioned above, we are generally supportive of the content and direction of the GPS. However, there are some key themes or areas that we want to re-emphasise as this process moves forward.

7. **Vital role of CHPs in the housing and urban development system**
 - a. We have joined many others in advocating for stronger partnerships between CHPs and other parts of this housing system during the development of the GPS. The role of CHPs is vital across the outcomes, focus areas and ways of working parts of the GPS.

 - b. It is not clear in the Discussion Document whether government is making a clear decision to increase capital investment to CHPs to enable building more houses. The Document states *we need to attract private and philanthropic capital (e.g., Community Finance) to support the growth of non-government providers* (page 45). We agree with this statement. Our Royal Oak social housing development leveraged off this kind of private investment.ⁱⁱⁱ But increased public funding for the CHP sector is equally important to strengthen progressive home ownership pathways from CHPs, and enable the development of more long-term, affordable social houses. The proposed actions block (page 46) does mention *direct government investment and support towards working with NGO providers*. But we seek clarification as to whether this involves much-needed increased public capital investment into CHPs.

 - c. Additionally, while the role of private and philanthropic investment is crucial to support housing projects from CHPs, it is still a relatively new tool to help combat these housing challenges. Solutions like the Aotearoa Pledge and Community Finance direct private funding towards housing issues which is positive. Additionally, philanthropic funding is accessed for numerous projects and causes, and not just housing projects. We are *not* necessarily advocating for regulation regarding this private and philanthropic investment. But we do submit that best practice guidelines and checks and balance are in place that can help CHPs build and develop projects at scale to address key parts of housing need, specifically the high numbers on the social housing register, and those on lower incomes looking for long-term rental options.

 - d. Another relevant issue that we have raised previously is around the Maori-driven solutions. We welcome the strong focus on partnering for Maori solutions and the right to self-determine for Maori. We strongly support the proposed actions in this section. However, The Salvation Army is not a Maori housing provider or iwi group, yet significant parts of our housing provision are for Maori. For example, we have provided over 1,750 transitional housing places across the country in the last year. Nearly 45 per cent of these places are for Maori. This is a nuance that we believe should be acknowledged. For example, The Salvation Army currently has a growing relationship with Tainui regarding our social services, especially around housing

provision. Again, we support the direction around Maori-led housing solutions in the GPS. However, with many other providers or CHPs involved in housing provision for Maori, the GPS and its actions should account for these realities.

8. Local, community-based solutions

- a. We support the emphasis on communities and place-based approaches throughout the outcomes, focus areas and ways of working of the GPS. We have previously been critical of the urban development approach and lack of effective community engagement in the Mangere and Porirua projects specifically. Many of these communities where urban redevelopment is happening at large scales are places where we have long-standing relationships and deliver our church and social support services. Consequently, many in these communities are not fully informed and fearful of these massive physical and social changes (particularly with Kainga Ora projects) happening in their local communities. Therefore, we contend that this emphasis in the GPS on thriving communities and local, place-based initiatives must have genuine and effective connection from government with these communities. In our view, this has not been the case in the current redevelopment agenda. We have proposed some community-based solutions in our submission to the Kāinga Ora–Homes and Communities Act 2019, including
 - Real community engagement approaches that can help ensure the local communities where these urban redevelopment projects are taking place are not ignored, excluded, or damaged by the projects. There are several proven models already operating such as.
 - Mission Anti-Displacement Coalition – formed in the Mission District of San Francisco, USA, to challenge the gentrification in the traditionally working-class Mission District.
 - Aboriginal Housing Corporation – formed because of the gentrification of Redfern, Sydney, a working class, and high-Aboriginal population suburb of Inner Sydney.
 - Waterloo Public Housing Action Group – formed in Waterloo area of Sydney.
 - 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.
 - Connecting schemes like Kiwi Buy (promoted by The Salvation Army and other community housing providers) and other shared equity schemes to these locals buying their first homes in their own communities.^{iv}

Specific responses to the GPS

9. Vision – We are supportive of the stated vision

10. Outcomes – Again, we are supportive of the four stated aspirational outcomes. Some specific responses we have include:

- a. **Thriving communities** – see comments in paragraph 8a above.
- b. **Wellbeing through housing** – we submit that the damaging cycle where people move frequently between homelessness, housing deprivation, emergency, transitional and social housing must be addressed as a key outcome and within the focus areas. There are numerous emerging challenges including people often living

beyond the 12-week contractual period for transitional housing, or families being placed in expensive private rental houses which are classed as emergency housing. The wellbeing of these people and whanau is definitely at risk in these parts of the system because they need security of tenure and stable housing

- c. **Partnering for Maori solutions** – we support this area. We have also raised a nuanced issue in paragraph 7a above.
- d. **Adaptive and responsive system** – we support this section as described in the discussion document. We have raised other systemic issues in other parts of this submission. It is important to note that there seems to be good progress nationally with other parts of the system such as Sustaining Tenancies and the Housing First programme which we welcome.

11. Six focus areas

- a. We are supportive of these six initial focus areas and the actions assigned to these areas. There are some specific comments we make about these areas:
 - We submit that a broader definition be used in the homelessness focus area. In our experience, housing stress also involves over-crowding and couch-surfing and other transient housing choices.
 - The homelessness area references social services that work with homeless people. We submit that the social service contracts that NGOs have with government to provide these specific and/or wrap around social support services are often restrictive and do not adequately cover or reflect the huge amount of work required to support people with complex and high needs. This area of appropriately funded social service contracts needs addressing in the homelessness area, as well as throughout the outcomes and other focus areas.
 - There must be greater clarity as what qualifies as affordable housing, particularly for lower income households, as the GPS programme of work progresses.
 - The right to housing for citizens should also be more explicit in the development and progress of the GPS.

ⁱ <https://kiwibuy.kiwi/>

ⁱⁱ <https://www.salvationarmy.org.nz/news/tenants-move-westgate-salvation-army-housing-development>

ⁱⁱⁱ <https://www.newshub.co.nz/home/money/2019/12/community-finance-scheme-tackles-kiwi-housing-crisis.html>

^{iv} <https://www.salvationarmy.org.nz/article/submission-k%C4%81inga-ora%E2%80%94homes-and-communities-bill>