

30 July 2021

Ministry of Housing and Urban Development  
PO Box 82  
Wellington 6140

Via email : [hud\\_gps@hud.govt.nz](mailto:hud_gps@hud.govt.nz)

Tēnā koutou,

## **Greater Christchurch Partnership submission on the Government Policy Statement on Housing and Urban Development discussion document**

### **Introduction**

1. Thank you for the opportunity to comment on the Government Policy Statement on Housing and Urban Development (GPS-HUD) discussion document.
2. Greater Christchurch is the largest urban area in the Canterbury region, supporting about 80% of the regional population and 40% of the South Island population.
3. The Greater Christchurch Partnership is a collaborative partnership of the Councils in the Greater Christchurch area (Christchurch City Council, Environment Canterbury, Selwyn District Council, Waimakariri District Council), Te Rūnanga o Ngāi Tahu, the Canterbury District Health Board, and central government, represented currently by Waka Kotahi (NZ Transport Agency).
4. The Partnership has been in existence since 2007 and is focused on integrated transport, infrastructure, and land use planning in the context of intergenerational wellbeing.

### **Key submission points**

5. The Greater Christchurch Partnership commends the approach of conceiving housing as a merit good rather than a commodified, market one.
6. The Partnership broadly supports the overall direction and approach outlined in the discussion document for how the Government will work with others to realise a better housing and urban future for New Zealand. This includes the proposed vision, outcomes, focus areas and ways of working for the GPS-HUD.
7. This submission therefore focuses on a few key points of particular interest for the Partnership, including climate change, integrated land-use and infrastructure planning, and a strengthened partnership approach between central government, local government and iwi.
8. We also note that to help give effect to the GPS-HUD, some clearer explanation on the systemic changes and mechanisms needed to achieve its goals for affordable housing provision and security should be included.

## Climate change and our natural environment

9. The Greater Christchurch Partnership **strongly agrees with the importance of and urgent need to address climate change** for the benefit of current and future generations, and agrees that our urban areas need to do more to plan for and adapt to climate change. This is particularly in the context of the Climate Commission's recent reporting that New Zealand's transport system will need to be almost completely decarbonised to meet the recommended emissions reduction targets for 2050. Our urban areas will need to play a major role to help achieve this.
10. While the discussion document identifies climate change as a key challenge facing our urban areas – both in terms of climate change adaptation and mitigation – we do not believe that the criticality and urgency of addressing climate change, or for maintaining and improving our natural environment, are reflected strongly enough in the proposed outcomes and focus areas for the GPS-HUD. These key issues for our urban areas are currently only alluded to in one of the proposed outcomes (“Thriving communities”) and one of the proposed focus areas (“Support resilient, sustainable, inclusive and prosperous communities”).
11. We recommend that **either a new outcome and focus area is created to reflect the urgency of addressing climate change, and maintaining and improving our natural environment, or that stronger reference is made to these core issues in the currently proposed outcomes and focus areas**. Having an outcome specifically related to environmental sustainability and a focus area specifically related to climate change in the GPS-HUD would strongly align with the approach taken in the Government Policy Statement on Land Transport 2021 – a key government strategy that the GPS-HUD should be closely connected to.
12. By setting outcomes and focus areas that more strongly reflect the urgent need to address climate change, and maintain and improve our natural environment, the GPS-HUD can help ensure that all Government policy and activity are aligned and working towards realising a shared and consistent view of a more sustainable future for our urban areas in New Zealand.

## Integrated land use and infrastructure planning

13. The Partnership **agrees in principle with the proposed outcome in the GPS-HUD for an “Adaptive and responsive system”** that focuses on a housing and urban development system that is integrated, self-adjusting and responsive to emerging challenges and opportunities. We also **agree in principle with the proposed focus area to “Ensure that more affordable houses are being built”**, which involves creating a housing and urban land market that can better respond to population growth and changing household preferences. We are particularly supportive where this promotes urban intensification.
14. However, we do **note our concern that a more adaptive and responsive system could lead to greater misalignment between where housing development occurs and where infrastructure is provided**. This concern particularly relates to the urgent need to plan for and invest in better transport options and urban land use to increase development in locations that support access, decrease travel times and reduce emissions. The fact that only 9.5% of homes built in New Zealand in 2019/20 had access to frequent public transport services highlights the point that more should be done to ensure land use and transport planning are fully integrated.

15. A current example of this issue is the requirements in the National Policy Statement on Urban Development 2020 for councils to have particular regard to plan changes that provide significant housing development capacity, regardless of whether it is enabled in a plan or in sequence with planned land release. While this policy provides more opportunities for new housing, it also risks development occurring in areas where infrastructure is not currently well planned, and infrastructure that has already been identified in growth and urban regeneration areas in resource management plans and/or spatial plans being under-utilised.
16. While freeing up more land for housing is necessary to ensure enough homes are built to meet the needs of our growing population and to address affordability issues, it is important that the right type of growth is still promoted in our urban areas to ensure we achieve our sustainability goals. We believe that a focus on **strategic growth planning (such as through spatial plans) is fundamental to achieving a coordinated approach to land use and infrastructure planning**, and for providing certainty about how our urban areas will grow and change in the future and that the Government needs to **provide strong support for local government decisions** on such land use and transport/infrastructure integration.

### **Wellbeing through housing**

17. The Partnership **commends the 'Wellbeing through housing' outcome**, in particular the approach of conceiving **housing as a merit good** rather than a commodified, market one. The evidence is clear that the quality of housing has a direct impact on the wellbeing of those living in that housing.
18. What could also be better emphasised is more **systemically linking homelessness to the rest of the housing continuum** to avoid the risk of overly focusing on homeless specific projects (system symptoms) and not so much on how affordable housing (system settings) can be provided, both owned and rented.
19. Both central and local government should be **leaders in innovative forms of housing models to meet a greater range of housing need**. In particular, a greater range of ownership tenures, such as leasing and co-operative models, are more likely to provide more integrated, secure housing outcomes for households where the gap between social or community housing and home ownership is too great. This is significant as renting does not provide or lead to equity, with reduced levels of home ownership contributing to wealth inequality, and insecurity as people age.
20. Also central to housing wellbeing is the **quality of the neighbourhoods** that are developed. Well-designed homes, sites and neighbourhoods are integral to safe, sustainable and thriving communities. The decisions made at building and site level can have substantial impacts on the future of our communities, and how well they function and thrive within the resultant environment.

### **Strengthened partnership between central government, local government and iwi**

#### ***Strengthened partnerships and policy settings to support partners to deliver the GPS outcomes and actions***

21. The Greater Christchurch Partnership supports the focus in the discussion document on **fostering genuine and enduring partnerships** between central government, local government, iwi and other partners to maximise housing and urban development

outcomes. To address the housing crisis, an urgent whole of government approach is needed that addresses systemic issues and identify new, practical solutions focused on the outcome of housing as a wellbeing good.

22. This strengthened partnership approach is essential for being able to **leverage the investment, resources and tools** available to effectively deliver on our communities' aspirations, and to respond to the opportunities and address the challenges facing our urban areas. This includes by way of specific example what sort of financial mechanisms will address affordability first rather than prioritise a speculative property market, and how low income households can affordably gain security through housing. **Local government, with its ability to contribute through planning, design, economic and skills development, and community housing initiatives should be regarded as a logical and key strategic partner.**
23. Government needs to provide and support enabling policy settings that support local government and others to deliver the GPS outcomes and actions, to establish frameworks for a housing 'reset' that the discussion document points toward. Examples where this ought to happen to prevent bespoke, reinventing wheel approaches for local authorities include **affordable housing requirements (e.g. inclusionary zoning), value uplift capture, and tenures such as leasehold and co-operative housing.** Doing so would better enable Councils to lead by example in the best use of their land and resources.

#### ***Partnering for Māori housing and urban solutions***

24. The Partnership also strongly **supports the 'Partnering for Māori housing and urban solutions'** outcome and agrees that Māori should be able to self-determine their own housing needs and aspirations. Iwi and hapu/ rūnanga representatives should be **supported to work with government agencies to devise policy and direct funding** for building on both multiply-owned Māori land and general land which is owned by Māori.

#### ***Taking a place-based approach***

25. We also **commend the focus in the discussion document on place-based approaches**, which recognises that a one-size-fits-all solution for housing and urban development issues will not deliver the thriving communities we want across the country.
26. Taking a place-based approach to interventions is particularly relevant to an urban area like Greater Christchurch, which is not currently facing the same immediate crisis in housing supply or transport infrastructure that is affecting other major urban centres in New Zealand. This could provide the opportunity, for instance, to take an approach in Greater Christchurch that **focuses more on innovating and investing in sustainable urban solutions before a crisis point is reached** – helping to retain a higher quality of life for our communities.
27. In this context, we note that Greater Christchurch is identified in the discussion document as an Urban Growth Partnership area. We wish to acknowledge the work underway between the Greater Christchurch Partnership and the Ministry of Housing and Urban Development to establish an Urban Growth Partnership, and that **we look forward to the opportunity for a strengthened partnership approach between central government, local government and iwi for Greater Christchurch.** As noted above, we believe this is critical for being able to effectively deliver on our communities' aspirations now and in the future.

28. Finally, we also suggest that continuing to establish these place-based partnerships should be identified in the GPS-HUD as a short-term priority. Having these partnerships in place would help deliver on the other priorities identified in the discussion document related to increasing housing supply and affordability, meeting housing needs and delivering system reform.

### **Closing remarks**

29. The Greater Christchurch Partnership recognises the role of the GPS-HUD as a way to communicate the long-term vision and the key changes required for housing and urban development in New Zealand, and for setting out how the Government will work with others to realise this vision.
30. The Greater Christchurch Partnership broadly supports the overall direction and approach outlined in the discussion document that will be included in the final GPS-HUD later this year.
31. However, as outlined in this submission, we believe that the GPS-HUD should have a stronger focus on addressing climate change, and maintaining and improving our natural environment, through its outcomes and focus areas. We have also outlined our concerns about a more adaptive and responsive system, and our strong support for strengthened partnership between central government, local government and iwi to maximise housing and urban development outcomes across the country.
32. The Greater Christchurch Partnership appreciates the opportunity provided to comment on the GPS-HUD discussion document. We would be happy to further discuss our submission with you.

Nāku, nā

A handwritten signature in black ink, appearing to read 'Jim Palmer', with a large, sweeping flourish at the end.

**Jim Palmer**

Chair