



**Kāinga Ora—Homes and Communities Bill
Environment Committee**

The Salvation Army New Zealand Fiji Tonga and Samoa Territory Submission

Executive Summary

1. The Salvation Army overall is supportive of this new approach to housing and urban development issues detailed in this Bill.
2. At the same time, there are specific aspects of this Bill that 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 safe guarding 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 of this new entity. These points are discussed further below.

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. We have over 90 Community Ministry centres and Churches (Corps) across the nation, serving local families and communities. This service covers numerous Christian spiritual and social (addictions, social housing, prisoner reintegration, foodbanks, social work, community finance, financial mentoring and budgeting and many more) services across the nation. We are passionately committed to our communities as we aim to fulfil our Territorial Mission Statement; **caring for people, transforming lives and reforming society by God's power.**¹
4. This submission has been prepared by the Social Policy and Parliamentary Unit of The Salvation Army. This Unit works towards the eradication of poverty by advocating for policies and practices that strengthen the social framework of New Zealand. This submission has been approved by Commissioner Andrew Westrupp, Territorial Commander of The Salvation Army's New Zealand Fiji Tonga and Samoa Territory.

¹ Retrieved 30 May 2019 from: <http://www.salvationarmy.org.nz/our-community/mission/>

General Salvation Army Submissions

5. The move to centralise key housing policies and programmes under KOHC is a positive move. At various times, The Salvation Army has been critical of the lack of coordination and disjointed nature of housing policy development and housing provision from the Government. This Bill is therefore a much needed major reform of this area that is in our opinion long overdue. 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). We are particularly supportive of the continuation of home ownership programmes through this Bill such as the Welcome Home Loans product. Also, the clear stated intentions to work with Maori iwi are another very positive aspect of this Bill.
6. For this brief submission, we have tried to gather perspectives from different parts and arms of The Salvation Army that are involved in forms of housing provision. This includes our Salvation Army Social Housing Unit (SASH), Community Ministries service, and Supportive Accommodation service.
7. Our SASH service commented that they understood the rationale of formally combining HNZA and HLC as they are essentially connected already. But SASH staff added that they could not fully understand the logic of including Kiwi Build into KOHC as they thought this could spell the end of this Kiwi Build policy as it becomes subsumed by the other parts of KOHC. Consequently, we request clarification as to the logic of including Kiwi Build into this new mix.
8. Additionally, our SASH staff provided solid feedback that one of the key areas of this Bill and the new KOHC entity is the need to have strong and effective governance in the new Board of KOHC. 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 new Board is crucial to the real impact of KOHC.
9. The Salvation Army proposes that alongside the recognised governance skills required for this Board, there should be a focus on people that have the following key skills, abilities and backgrounds. Specifically, we recommend that these Board members have:
 - a. Good understanding of the housing environment and macro strategic skills;
 - b. Had some experience at the governance or management level in the Community Housing environment in Aotearoa;
 - c. Have real experience in working with State Housing tenants in Aotearoa;
 - d. Ability to think in an innovative, creative and broad way about redirecting housing policy and direction in Aotearoa.

- 10.** 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 as such. This kind of Board member will help ensure the high performance and accountability of this new KOHC.
- 11.** One of the significant areas of concerns we have with this Bill is the role KOHC will have with coordinating urban development projects around the country. This function is essentially already in operation with the redevelopments taking place in Mangere, Mt Roskill, Porirua and other places between HNZC and HLC. The Salvation Army understands that this role is crucial to regenerate areas, increase and improve the social housing stock, and help alleviate the housing pressures faced by those on the social housing register.
- 12.** In our view, it is critical to keep communities at the core of these redevelopment projects. The Salvation Army is involved in informal ways in the community advocacy and organising in areas like Mangere and Porirua where major projects are already under way. We have had recent lessons with the Tamaki redevelopment of where this kind of redevelopment has had mixed results and created real distress for the local communities involved.
- 13.** We do not want to see gentrification and the damaging of communities through these redevelopment projects. For the Mangere redevelopment for example, the community involvement and consultation was several years late and now the community is 'playing catch up' to ensure HNZC and HLC are held to account in their redevelopment work. Also, HNZC and HLC are not community experts as such. HLC are developers, not a community engagement agency. So we submit greater connection will be required between KOHC and the affected communities to guarantee these projects do not damage these long standing and proud communities.
- 14.** The Salvation Army submits there are several ways to ensure that these existing communities are not adversely affected, as well as bringing in community mixing in effective ways. These include;
 - a.** Innovative community engagement approaches such as the Mangere Guardians Proposal that was submitted to the former Minister of Housing. This was submitted by the Mangere Housing Community Reference Group as a means of working strategically with HLC and HNZC. These kinds of community engagement models are crucial moving forward to ensure the local communities where these redevelopment projects are taking place are not ignored, excluded or damaged by the projects;
 - b.** 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;
 - c.** 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.

15. Finally in this section, we want to highlight the potential for confusion regarding Ministers with this new entity. It is interesting that at the same time that all these housing-related agencies and budgets are coming together, there are several housing-related Ministers in the Prime Minister's new cabinet as of June 2019. The Bill does state in the section 5 (Interpretation Section) that the key Ministers for the administration of this Bill are the Minister of Finance and whichever other Minister the Prime Minister authorises. From a community perspective, we 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 the seemingly complex Ministerial arrangements. Manoeuvring through government bureaucracies is extremely difficult even for large Christian NGOs like The Salvation Army. This is magnified even more for our local community members.

Specific Responses to Amendments

16. Section 4

- a. We fully support this section around Maori interests.

17. Section 5

- a. We have already discussed in paragraph 15 in our submission above around the clarification of Ministers responsible for this new entity to ensure the community is not confused or put off by the likely size and complexity of this new entity.

18. Section 10

- a. Again, we have discussed our views of the new KOHC Board in paragraphs 8 to 10 of this submission.
- b. We submit that there needs to be included in this list an explicit reference to the new Board members having experience, knowledge and capability in the community housing sector as this is a crucial aspect of social housing and the housing continuum in general.

19. Section 12

- a. We support the stated objective of KOHC in this provision.

20. Section 13

- a. In terms of the functions of KOHC, we submit that there needs to be a strong focus on early and effective consultation and engagement with local communities where urban redevelopment projects are planned. We submit that this has not worked well in recent projects around Auckland.
- b. We contend that sections 13 (1) (f), (g) and (h) of the Bill are especially crucial to safeguard local communities.
- c. We also support section 13 (1) (j) which discusses the potential of co-investment with others interested in urban development. Again we advocate that this 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.

- 21. We support sections 14 to 21 of the Bill. These provisions are more for the practical operations for the new entity.

22. Part 2, Subpart 1 – GPS and housing and urban development

- a.** We are generally supportive of this Government Policy Statement.
 - b.** As per section 24 of the Bill, we submit that some clear targets are detailed in the new GPS.
 - c.** We support the long-term focus of the GPS for 10 years, with reviews potentially every 3 years.
 - d.** 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.
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