



17 August 2025

S25.18

Submission to Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development and the Ministry of Environment — Manatū Mō Te Taiao on the Going for Housing Growth programme

Introduction

1. The National Council of Women of New Zealand, Te Kaunihera Wāhine o Aotearoa (NCWNZ), is an umbrella group representing around 60 affiliated organisations and 300 individual members. Collectively, our reach extends to over 200,000 people, with many of our membership organisations representing all genders. NCWNZ has 12 branches across the country.
2. NCWNZ's vision is a gender equal New Zealand. Research shows we will be better off socially and economically if we are gender equal. Through research, discussion and action, NCWNZ - in partnership with others - seeks to realise its vision of gender equality because it is a basic human right.
3. This submission has been prepared by NCWNZ's Parliamentary Watch Committee, and the Climate Change and Environmental Sustainability Action Hub, following consultation with our members. It draws on previous submissions¹ and resolutions endorsed by members over nearly 130 years².

Summary

4. The Going for Housing Growth: Providing for urban development in the new resource management system Discussion Paper (the Discussion Paper)³ explores how Pillar 1 proposals to provide more certainty to councils and communities could be applied within the new resource management system.

¹ NCWNZ. 2023. S23.03 Natural and Built Environment Bill 186-1

[S23.03 Natural and Built Environment Bill.pdf](#)

² NCWNZ. 2012. 115 years of resolution. <http://www.ncwnz.org.nz/wp-content/uploads/2013/06/115-years-Register-everything-2.pdf>.

³ Ministry of Housing and Urban Development, NZ. Going for Housing Growth: Providing for urban development in the new resource management system. Discussion Paper. June 25. [Going for Housing Growth: Providing for urban development in the new resource management system - Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development](#). Clause 16.

5. NCWNZ acknowledges the complexity of balancing housing and infrastructure needs with food production, environmental sustainability, and climate change. We bring a gender lens to this challenge, recognising that women often face financial barriers that limit access to home ownership and secure rental housing. These barriers include lower wages, career breaks for caregiving, reduced KiwiSaver contributions, and longer life expectancy—all of which increase the need for financial security.
6. We provide general feedback, touching on some of the 37 set questions, and focusing on: urban development in the new resource management system; infrastructure requirements; enabling a mix of uses across urban environments; impacts of proposals on Māori.

Human Rights and Obligations

International agreements on gender equality

7. There are significant international agreements with which the proposed housing growth programme must align, such as the Paris Agreement 2015⁴, CEDAW⁵, and the UN Sustainable Development Goals⁶. The CEDAW Committee recommends that the State Party⁷:
 - Increase budgetary allocations for the implementation of policies and programmes for the economic empowerment of older women, women with disabilities, rural women, Māori and Pacifica women and non-national and ethnic minority women, including measures to address poverty, illiteracy, unpaid work, access to healthcare, **housing**, and social and economic benefits.
8. Recent data from the National Homelessness Data Project⁸ shows that 57,000 women are experiencing homelessness, with older women (55+) increasingly at risk due to limited housing options and agency prioritisation gaps.
9. The Ministry for Housing and Urban Development’s June 2025 report⁹ acknowledges that while housing supply will grow, ongoing support for those at risk of homelessness remains essential: social housing of the right type, in the right place – and matched to

⁴ The Paris Agreement: What is the Paris Agreement? <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement> 5

⁵ United Nations. 1979. Convention on the Elimination of All Forms of Discrimination against Women New York, 18 December 1979. <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women>

⁶ Arora NK, Mishra I. 2019. United Nations Sustainable Development Goals 2030 and environmental sustainability: race against time. *Environmental Sustainability* 2: 339–342. <https://doi.org/10.1007/s42398-019-00092-y>

⁷ Committee on the Elimination of Discrimination against Women. 2024. Concluding observations on the ninth periodic report of New Zealand. https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW%2FCO%2F9&Lang=en

⁸ Salvation Army. [New Data Highlights Urgent Need for A Coordinated Response to Homelessness Across the Nation - The Salvation Army NZFTS](#)

⁹ [Homelessness-insights-report-June-2025-PDF-1.0.pdf](#)

housing need – provides safe and secure housing for people who can't afford or access private rental housing.

10. Recommendations:

- a) Uphold international human rights and gender equality and equity commitments.
- b) Fund policies and programmes that ensure all New Zealanders have access to safe, secure housing.

Te Tiriti o Waitangi and impact on Māori

11. NCWNZ is concerned that the urgency in this proposal will affect Māori, who are disproportionately impacted by barriers to housing. The government must embed Te Tiriti principles in housing decisions and continue supporting iwi-led development.
12. Māori are creating immediate housing solutions for their own people with the support of government agencies. Te Puni Kōkiri supports the establishment of a Te Ao Māori papakainga community (generally 3 -10 houses)¹⁰. These communities will be owned and occupied by the owners of whenua maintaining a connection to their land.
13. The Whai Kāinga Whai Oranga initiative¹¹, jointly administered by the Ministry of Housing and Development with Te Puni Kōkiri, has committed \$730 million over four years to Māori-led housing, including repairs and new builds.

14. Recommendations:

- a) Embed the principles of Te Tiriti o Waitangi into all housing policy and decision-making processes.
- b) Enable housing projects that reflect Tino Rangatiratanga and Te Ao Māori values on whānau or general title land.

Climate Change and Environmental Impact

15. NCWNZ is dismayed that the Discussion Paper makes no substantive reference to climate change or environmental impacts, aside from citing the title of relevant legislation.
16. Our members have consistently raised concerns about the need for resilience in the face of climate events including surface water in urban areas.¹² Our 2023 submission states:
As parts of Aotearoa New Zealand are becoming wetter and weather events are becoming more intense, risks are changing. Further, with the significant increase of impermeable surfaces from increased housing density an existing problem intensifies. As many urban areas densify, there will be substantial

¹⁰ Te Puni Kōkiri. Supporting new homes and papakāinga. [Supporting new homes and papakāinga](#) . Updated 19 September 2024.

¹¹ [Whai Kāinga Whai Oranga - Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development](#)

¹² NCWNZ. 2012. 115 years of resolution. <http://www.ncwnz.org.nz/wp-content/uploads/2013/06/115-years-Register-everything-2.pdf>. Policy 7.13.5, 2010. That NCWNZ urge the Government to develop further initiatives to prepare New Zealand for the increasing effects of Climate Change.

increases in surface water flooding and pollution of receiving waters. Much of this is currently undocumented and unconsented and existing infrastructure is not coping. This affects the health and safety of natural and built environments and presents tangible risks to people, including women and children and to property¹³.

17. Without robust safeguards, housing development could negatively impact the environment, resulting in silt runoff into streams, rivers, and the sea, thus causing environmental damage to bird and fish breeding sites. Additionally, there is the potential for an increase in mangroves, along with a decrease in green spaces. Other consequences include increased stormwater runoff, and greater urban heat effects.

18. Members provided examples such as Leaside Lock, a new-build development in east London. The Guardian article¹⁴ reports that experts have warned that many of the new homes being built in the UK are not designed to withstand the more extreme summer temperatures being seen due to climate change.

19. Recommendations:

- a) Minimise environmental impacts during housing development, particularly where land is cleared, and protecting native trees wherever possible.
- b) Preserve and expand green corridors to support biodiversity and allow native birds to move between habitats in both urban and rural areas.
- c) Establish clear guidelines for building consents near flood-prone areas.
- d) Incorporate climate-resilient and low-impact design principles, such as:
 - Elevated structures and flood-resistant materials;
 - Permeable surfaces to reduce runoff;
 - Strategic window placement for temperature control;
 - Sustainable drainage systems.
- e) Design buildings and urban areas to reduce overheating risks, including avoiding “heat islands” between high-rise buildings, and comfortable internal spaces.

Rural-Urban Boundaries and Productive Land Use

20. Members were unanimous in their concern regarding the impact of building consents encroaching on fertile land; in particular, arable, productive farming land.

21. A July 2025 article from the Science Media Centre¹⁵ reports that the Government is considering changes to the Resource Management Act (RMA) that would allow housing development on some of Aotearoa’s most productive agricultural land. This proposal has drawn strong opposition from experts, including Emeritus Professor D. J. Lowe and Dr. P.

¹³ NCWNZ. 2023. S23.03 Natural and Built Environment Bill 186-1. Clause 43.

¹⁴ The Guardian. Article amended 12 August 2025. ‘Do not buy these flats’: residents warn about unbearable heat inside London new-builds. [‘Do not buy these flats’: residents warn about unbearable heat inside London new-builds | Extreme heat | The Guardian](#)

¹⁵ Ibid

Roudier. The latter reports that only 14% of New Zealand’s soil is classified as highly productive.¹⁶ He states:

“New Zealand would risk losing large, connected and versatile areas of land that are essential to both domestic food supply and high-value export industries. Once this land is built on, it’s lost from food production forever.”

22. NCWNZ members provided examples of their concerns. For example, in Mosgiel, rapid expansion is occurring without clear boundaries. High-grade soil is being used for housing, despite its unsuitability for residential gardens. Increased impermeable surfaces are reducing green space, overwhelming stormwater systems, and causing surface flooding. Moreover, the population boom in Queenstown has meant that ‘once largely farmland, the area is now a canvas for high-end housing developments.’ Older infrastructure is unable to support recent housing growth. Issues include sewage discharge into the Shotover River and severe traffic congestion.¹⁷

23. Recommendations

- a) Carefully assess the impact of urban expansion on rural areas, including effects such as noise, spray drift, and the operation of agricultural machinery.
- b) Consider the long-term risks of food shortages and rising prices for locally grown produce due to the loss of productive land, especially near urban centres.

Infrastructure Requirements

24. NCWNZ is concerned that the housing shortage and homelessness crisis is influenced by more factors than those identified in the Discussion Paper. In particular, population growth driven by immigration and property purchases by non-residents has a direct impact on housing demand. Greater transparency regarding the effects of immigration policy on housing supply is needed between central government, local government, and communities. This requires moving beyond siloed thinking.

25. Members are especially concerned about the risks of approving housing developments before essential infrastructure is in place—such as wastewater, clean water, and stormwater systems. Many councils are already struggling with aging infrastructure and rapid urban growth, leading to capacity issues, treatment inefficiencies, and environmental harm.

26. While the proposals mention flexible funding tools to reduce financial pressure on councils and ratepayers, NCWNZ members remain concerned about the long-term costs. These include not only the initial infrastructure investment but also ongoing maintenance and upgrades, particularly in response to climate-related emergencies.

¹⁶ Science Media Centre. Opening up highly productive land for housing – Expert Reaction. 22 July 2025. <http://www.sciencemediacentre.co.nz/2025/07/22/opening-up-highly-productive-land-for-housing-expert-reaction/>

¹⁷ NZ Post. 20 July 2025. Queenstown risks becoming the ‘next Barcelona,’ and locals are afraid. [Queenstown risks becoming the ‘next Barcelona,’ and locals are afraid | The Post](#)

27. Our members provided the following examples: 1) In Warkworth, Radio New Zealand¹⁸ highlighted serious sewage overflows into the Mahurangi River due to insufficient wastewater capacity. Oyster farmers affected by this pollution face reducing their season from nine months to just three threatening their business viability; and 2) In Whitford, East Auckland, a Newsroom article¹⁹ reports that receivers have been appointed for failing to build crucial infrastructure.

28. Recommendations:

- a) Ensure infrastructure will be in place before approving housing developments, including:
 - water, sewerage, and stormwater systems;
 - public transport, electricity, roads, footpaths, and cycle lanes;
 - schools, health services, and waste/recycling facilities;
 - green spaces and community amenities.
- b) Engage local communities to identify infrastructure needs.
- c) Explore innovative solutions such as On-Demand public transport services to support growing populations.

Enabling a Mix of Users: Affordable Homes, Healthy Communities

29. NCWNZ strongly supports a housing growth programme that prioritises the development of affordable homes and fosters safe, healthy communities - particularly for women and their families.

30. In our 2023 submission, we emphasised the importance of open spaces in urban areas. These spaces not only support biodiversity and ecological corridors but also promote physical and emotional wellbeing. Access to quality green space is essential for healthy communities²⁰.

31. Spatial planning by councils should include requirements for mixed housing developments that offer accessible and affordable options for both owner-occupiers and renters across all income levels. This must also include sufficient social housing to meet growing demand, with appropriate accommodation for elderly people, disabled individuals, larger families, and single adults throughout New Zealand.

32. Some NCWNZ members raised concerns about the impact of high-density, poor-quality housing - particularly for women and children. Members shared positive approaches to

¹⁸ RNZ. 27 May 2025. Warkworth oyster farmers call for urgent solutions.

<http://www.rnz.co.nz/news/country/562302/warkworth-oyster-farmers-call-for-urgent-solution-to-swwage-overflowing-into-mahurangi-river>

¹⁹ Newsroom. 12 August 2025. Receivers appointed to luxury development that faced sewerage row. [Receivers appointed to luxury development that faced sewerage row - Newsroom](#)

²⁰ NCWNZ. 2023. S23.03 Natural and Built Environment Bill 186-1 [S23.03 Natural and Built Environment Bill.pdf](#). Clause 21.

housing. The “granny flat” legislation²¹ exempting certain small dwellings from building consent is expected to take effect in early 2026 and is seen as a positive step toward increasing housing options for women of all ages in urban, rural, mixed-use, and Māori purpose zones. The Post article²² reports on community housing providers offering communal living for seniors priced out of retirement villages. The latest developments have received start-up grants from the Ministry of Housing and Development.

33. NCWNZ also encourages the use of existing frameworks such as the Age Friendly Aotearoa New Zealand Toolkit²³ developed by the Office for Seniors, which supports inclusive planning for communities, towns, and cities.

34. Planning must consider proximity to essential services and public transport to reduce isolation and barriers for caregivers. These services include early childhood centres, schools, shops, medical facilities, and recreational amenities.

35. Recommendations:

- a) Ensure housing development supports the health and wellbeing of all communities, and for all lifestyles: e.g., single families, disabled individuals, older adults.
- b) Protect and plan for green corridors and open spaces in both urban and rural areas. Include space for communal gardens to enhance biodiversity, community resilience, and climate adaptation.
- c) Prioritise access to public transport and essential services to reduce isolation and improve quality of life.

Democratic Processes and Decisions

36. NCWNZ members have raised concerns about the level of transparency in the development of housing policy under the Resource Management Act (RMA). Specifically, questions were asked about who determines what is considered within scope and what is deemed an “unnecessary planning barrier.” When decisions are made with a narrow financial focus and without broad input, there is a risk of unintended social and environmental consequences often impacting adversely on women.

37. NCWNZ believes it is essential to have clear accountability measures in place and to ensure that women are actively involved in decision-making processes related to the RMA’s review and implementation.

38. Ongoing dialogue between developers, local authorities, and communities is critical to achieving sustainable growth while maintaining safe, resilient neighbourhoods. The Discussion Paper places significant emphasis on Tier 1 and Tier 2 councils, but Tier 3

²¹ Ministry for Business, Innovation and Employment. Changes to allow small standalone dwellings (granny flats) to be built without building consent. May 2025. [Building consent changes for small standalone dwellings \(granny flats\) | Building Performance](#)

²² [The 1 in 5: Flattening life for seniors who don't own a home | The Press](#)

²³ Office for Seniors - Te Tari Kaumātua. October 2021. Age Friendly Aotearoa NZ Toolkit. [Age friendly Aotearoa New Zealand toolkit | Te Tari Kaumātua](#)

councils may struggle with limited resources. Regardless of location, all families and individuals should have the same housing needs and rights.

39. NCWNZ members also support the idea that developers should take greater responsibility for the long-term impacts of their developments. One suggestion is a bond system, where developers are held accountable for a period (e.g. 10 years), with bond release dependent on meeting key performance indicators—such as infrastructure reliability and environmental safety - to encourage thorough planning and responsible design.

40. Recommendations:

- a) Ensure transparent and inclusive decision-making processes, with meaningful involvement from women and communities.
- b) Promote collaboration between developers, councils, and communities to support sustainable and resilient neighbourhoods.
- c) Consider a developer accountability mechanism, such as a bond system tied to long-term performance outcomes.
- d) Ensure equitable support for all council tiers, acknowledging that housing needs are universal across regions.

Conclusions

41. NCWNZ recognises the seriousness of New Zealand’s housing shortage. Every person deserves access to safe, healthy, and secure housing. However, the gap is widening - particularly for women in precarious housing situations.

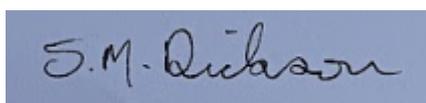
42. We are concerned that the financial focus of the housing review may compromise important social and environmental outcomes, including liveability, human rights, and gender equality.

43. Our submission highlights the risks of infrastructure lagging behind development, and the need to prioritise the protection of arable land for food production and climate resilience. These are priorities essential to building safe healthy communities and ensuring environmental sustainability is central to future development.

44. We urge the government to give particular attention to the housing needs of women most affected by inadequate access to housing, including wāhine Māori, ethnic minority women, migrant women, disabled women, rural women, single parents, and those on low incomes or benefits.



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