KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

BEFORE THE WAITANGI TRIBUNAL **WAI 2750**

IN THE MATTER OF	**the Treaty of Waitangi Act 1975**
AND	
IN THE MATTER OF	**Kaupapa inquiry into claims concerning Housing Policy and Services**

MEMORANDUM OF COUNSEL FOR THE CROWN FILING OFFICE OF THE AUDITOR GENERAL REPORT ON IMMEDIATE HOUSING NEED

18 May 2026

Te Tari Ture o te Karauna
Crown Law

Pouaka Poutāpeta
Te Whanganui-a-Tara
Waea

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Waitangi Tribunal
18 May 26
Ministry of Justice
WELLINGTON

E TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI:

MAY IT PLEASE THE TRIBUNAL:

1. On 9 October 2024, the Tribunal made the following direction:[1]

> Regarding further data or analysis, the Tribunal believes that this inquiry would benefit from having more information about the current living situations of those who formerly occupied emergency housing. Presuming the Crown tracks this data, I direct Crown counsel to file information regarding such matters no later than 5pm, Thursday 7 November 2024.

2. On 7 November 2024, Crown counsel advised:[2]

> Counsel are… instructed that Te Manatu Whakahiato Ora collects and holds… data that can be used to derive where people likely are living after leaving emergency housing in a range of formats and mediums, including emergency housing reporting, transitional housing placements, and social housing tenancies. Much of the data is not in a standardised or accessible format that would enable it to be provided to the Tribunal at present. Counsel are instructed that Te Manatu Whakahiato Ora, in conjunction with Te Tuapapa Kura Kainga, is currently putting this data into more accessible and understandable formats. This is an ongoing major piece of work that is expected to take some time to complete and is likely to be released in tranches. Crown counsel will file relevant information as soon as it becomes available.

3. The Crown has filed various updates since then, providing reports on housing deprivation (17 December 2024);[3] emergency housing data (30 January 2025);[4] homelessness action plan reporting (2 May 2025);[5] and housing as it intersects with issues of affordability and disparities in housing equality (15 July 2025).[6]

4. A further relevant report, "Supporting people in immediate housing need", has now been released by the Office of the Auditor General. This

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1 Wai 2750, #2.6.62 at [7].

2 Wai 2750, #3.2.441 at [6].

3 Wai 2750, #3.2.442.

4 Wai 2750, #3.2.443.

5 Wai 2750, #3.2.462.

6 Wai 2750, #3.2.468.

report includes the experience of people who are homeless and who engage in social housing.

5. A copy of the report is appended to this memorandum as **Appendix 1**.

6. An electronic copy of the report can also be found at the following link: https://ao.parliament.nz/2026/housing-need/docs/housing-need.pdf

18 May 2026

D Kleinsman / T Garimella
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal

AND TO: Claimant Counsel