

## Organisations

Submission ID	What do you think about the strategy's vision of 'community housing as a cornerstone of housing in Ōtautahi Christchurch for our wellbeing'?	What do you think about the strategy's priority actions for community housing in Ōtautahi Christchurch?	How active do you think the Council should be in either delivering and/or supporting community housing?	Name of organisation	Name
35898		<p>"I've had a brief look through and the strategy looks really robust Paul, great job.</p> <p>One thing I think could be added which aligns with the flow of the right to housing through the strategy, would be the establishment of a Christchurch [or other geographic signal) Housing Advocate with an underlying mandate to explore and promote right to housing outcomes in CHCH.</p> <p>This would ideal be funded and established by council, but with a distinctly independent role, and at times well placed to provide advice and leadership on housing issues even if they are not politically backed – which is the bind of council officers. The office would also be independent of providers, govt, developers etc...</p> <p>It is not intended to create opposition to council, but to provide another, different and expert, recognised voice and perspective.</p> <p>I would imagine in a city the size of CHCH this could be a one person role, i.e. without a secretariat, although they would need access to some supports and or funding for various activities: convening, comms, etc...</p> <p>Feel free to drop me a line anytime on any related matters            ??? good to chat yesterday.            "</p>		Shift Aotearoa Role: Manager System Shift	Brennan Rigby
35589	Abbeyfield New Zealand strongly supports this vision. and the principles articulated in the draft document.	If you mean the goals articulated in the draft strategy, we support these.	As active as possible. City Council support for community housing has already made a difference in this city and we encourage the Council to continue to the extent possible. CHPs cover a range of demographics and have specific expertise which can ensure suitable options for the city. Abbeyfield is part of the Goulding Avenue mixed-tenure development and would be keen to see this model replicated.	Abbeyfield New Zealand Inc  Role: Executive Officer	Susan Jenkins

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35845	<p>The Canterbury DHB supports the intent behind the vision, however we query the description of community housing as a 'cornerstone' of housing in Ōtautahi Christchurch. In architecture, the cornerstone is the first stone laid for a structure, upon which the rest of the structure is based. We agree that community housing is a key infrastructure ingredient and suggest 'integral element' or 'building block' would be more appropriate terms. It also seems that 'for our wellbeing' is an afterthought that has been tacked on to the end rather than being central to the vision. The Canterbury DHB proposes an alternative vision of:</p> <p>Community housing as an integral element of housing and wellbeing in Ōtautahi Christchurch</p>	<p>The Canterbury DHB supports the draft strategy's priority actions. We recommend there is additional context and clarity around universal design and physical accessibility and building to mitigate the impact of climate change.</p> <p>Universal design and accessibility</p> <p>Despite the introductory heading More inclusive community housing, the draft strategy lacks an explanation of the need for accessible housing set out in Goal 4.</p> <p>Figure 3 shows older people in couple-only households are on the rise and it is well recognised that disability increases with age. The Canterbury DHB recommends that disability and the ageing population are included in the explanation of inclusivity in order to provide context for the importance of universal design and physical accessibility.</p> <p>The Canterbury DHB supports the actions under Goal 3, Objective 1: A sound understanding of community housing need at the local level. In order to fulfil the actions of 'Identify and monitor a sound evidential base of current and future community housing need' and 'Understand and report on current provision,' the Canterbury DHB recommends that all community housing providers should be systematically collecting information on the disability status of applicants and residents, using the Washington Group Short Set of questions. This is now part of NZ census and other national surveys. If information on functional disability status is known, housing can better match community needs.</p> <p>We applaud the commitment of CCC to embedding universal design principles in social housing. The Canterbury DHB recommends that under Goal 4, Objective 1(Promote good urban design of community housing including universal design principles that recognise physical accessibility, mobility and independence), the action 'Lead the ongoing development of best practice' is made more specific. This could be, for example, by committing to the Lifemark approach for accessible design. While accessibility can be done well, the biggest challenges are in the smallest</p>	<p>The Canterbury DHB supports the Council being an active player in the delivery and support of community housing in Ōtautahi.</p>	<p>Canterbury District Health Board</p> <p>Role: Public Health Specialist</p>	<p>Emma Kenagy</p>

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		<p>residences. For example, accessible toilets need a certain amount of space. Narrow doors and hallways, and steps at front and rear entrances, are a problem unless solutions are 'designed in'. The Canterbury DHB recommends that the Council state its commitment in this document.</p> <p>The Canterbury DHB supports the commitment to 'streamlining' planning requirements for community housing – but we have some concern about the actions under Goal 3, Objective 5 (Advocate for reducing and streamlining planning requirements for community housing) that, unless specifically protected against, may result in low quality, inaccessible housing. It is important in streamlining and fast-tracking consenting and compliance services, quality and design, including universal design and accessibility, are not compromised. This risk could be mitigated by the Council having in-house technical accessibility expertise, to ensure that accessibility considerations are central to this objective.</p> <p>Climate Change</p> <p>The Canterbury DHB notes that the discussion of climate change in Wider challenges: climate change, pandemics and resilience relates primarily to inundation and sea level rise and associated threats and stressors for residents. While these are important considerations, we note there are other key considerations for housing relating to climate change, such as the need to build zero net energy of passive homes to reduce energy use and carbon emissions.<sup>8</sup> The Canterbury DHB recommends this context is included in the draft strategy and incorporated into Goal 4 in relation to design considerations for community housing.</p> <p>Canterbury has recently experienced a heatwave (defined as when temperatures are 5 degrees Celsius above the average for a given time of year). This may be one of the impacts of climate change we are already experiencing and the Canterbury DHB recommends that community housing design mitigates against over-heating as well as protection from cold.</p>			

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35617	<p>The intention behind the wording is fine. I would change the phrase to:</p> <p>Community housing which promotes wellbeing as a cornerstone of housing in Ōtautahi Christchurch</p>	<p>The right to housing as defined in international law needs to be highlighted in the principles- not just left to Goal 4. It underpins the whole strategy</p> <p>With regards to the priorities:</p> <ol style="list-style-type: none"> <li>1. Either under Goals 1 or 2: a strengthened relationship and stronger collaboration between central and local government is needed with regards to housing policy and practice</li> <li>2. Greater recognition is needed of the CCC's role as setting the 'development parameters' which encourages and supports the growth of community housing eg: inclusionary zoning; insisting that developments have a certain percentage of social housing; not allowing covenants on new developments.</li> <li>3. Under Goal 1: agree to prioritise community housing close to community hubs, transport and services- but also include point about ensuring that community facilities are developed alongside new housing developments</li> <li>4. Agree with mixed tenure housing regeneration (a mix of private ownership, rent-to-buy, private rentals and community housing (Goal 2)</li> <li>5. Agree with last point under Goal 2, 'ensure the utilisation of Council land and resources support and retain a range of community housing'</li> <li>6. Under Goal 3: agree with 'develop capital models that support CHPs. The model as developed by Queenstown Lakes District Council and their housing trust is worth considering</li> <li>7. Under Goal 3: agree with the CCC continuing to support community housing providers eg through exemption from development levies. This makes a significant difference to a CHPs financial ability to build. Other actions are supported.</li> <li>8. Given the increasing number of people who will be renting when they reach retirement, a greater emphasis is needed in the actions section (it is highlighted earlier in the paper) on increasing the supply of community housing for older</li> </ol>	<p>The Council should remain active in both delivering and supporting community housing- but needs to be doing this as a partnership with central government, local government, iwi and the community housing providers. The CCC should provide the 'settings' which encourage and promote good quality community housing which meets the needs of those who are currently excluded from the private housing market, paying particular attention to the needs of Māori, Pacifica, older people, youth, people with disabilities and those who may require additional support due to addictions or mental health issues .</p>	<p>Christchurch Methodist Mission</p> <p>Role: Executive Director</p>	<p>Jill Hawkey</p>

# Canterbury

District Health Board

Te Poari Hauora o Waitaha

## Submission on Draft Community Housing Strategy

**To:** Christchurch City Council

**Submitter:** Canterbury District Health Board

Attn: Emma Kenagy  
Community and Public Health  
C/- Canterbury District Health Board  
PO Box 1475  
Christchurch 8140

## SUBMISSION ON THE DRAFT COMMUNITY HOUSING STRATEGY 2020-2030

### Details of submitter

1. Canterbury District Health Board (CDHB).
2. The submitter is responsible for promoting the reduction of adverse environmental effects on the health of people and communities and to improve, promote and protect their health pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956. These statutory obligations are the responsibility of the Ministry of Health and, in the Canterbury District, are carried out under contract by Community and Public Health under Crown funding agreements on behalf of the Canterbury District Health Board.
3. The Ministry of Health requires the submitter to reduce potential health risks by such means as submissions to ensure the public health significance of potential adverse effects are adequately considered during policy development.

### Details of submission

4. We welcome the opportunity to comment on the Draft Community Housing Strategy. The future health of our populations is not just reliant on health services, but on a responsive environment where all sectors work collaboratively to support wellbeing and equitable outcomes across our community.

### General Comments

5. Housing is an important determinant of health<sup>1</sup> and there are a range of health impacts associated with sub-standard housing, particularly for vulnerable population groups such as older people, infants and young children, low income households, and people with chronic illness. The direct health impacts of poor quality housing relate to respiratory health, cardiovascular health, mental health and wellbeing, crowding, communicable diseases, and social functioning within the home. Indirect impacts relate to the wider determinants of health, such as food security, access to education and employment, and access to health services and other important

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<sup>1</sup> Gibson, M., Petticrew, M., Bamba, C., Sowden, A. J., Wright, K. E., & Whitehead, M. (2011). Housing and health inequalities: A synthesis of systematic reviews of interventions aimed at different pathways linking housing and health. *Health and Place*, 17(1), 175-184;

services.<sup>2</sup> Security of tenure is also a key consideration for community housing, as housing security and stability positively influence health and wellbeing.<sup>3</sup>

6. Renters have less control over the condition of their housing than those who own their own home. Māori and Pacifica<sup>4</sup>, disabled people<sup>5</sup>, and people with mental illness are more likely to live in rental accommodation than the general population.<sup>6</sup> People with mental illness are twice as likely as those without mental health concerns to be unhappy with their housing, and four times as likely to say their housing makes their health worse.<sup>7</sup> Affordable, secure, good-quality housing that is warm and dry is therefore crucial for supporting wellbeing, positive mental and physical health, and social connectedness.
7. The COVID-19 pandemic has provided another reminder that overcrowding is a major risk for transmission of infectious diseases. Affordable housing in the private sector is increasingly rare and social housing is necessary to provide a sufficient supply of housing to prevent overcrowding.
8. The CDHB supports the draft strategy and has a number of recommendations for consideration to improve health and wellbeing outcomes.

### Specific comments

What do you think about the strategy's vision of 'community housing as a cornerstone of housing in Ōtautahi Christchurch for our wellbeing'?

9. The Canterbury DHB supports the intent behind the vision, however we query the description of community housing as a 'cornerstone' of housing in Ōtautahi Christchurch. In architecture, the cornerstone is the first stone laid for a structure, upon which the rest of the structure is based. We agree that community housing is a key infrastructure ingredient and suggest 'integral element' or 'building block' would be more appropriate terms. It also seems that 'for our wellbeing' is an afterthought

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<sup>2</sup> Canterbury District Health Board (2015). *Health Impact Assessment: Review of Environment Canterbury's Air Plan, Potential effects of wood burner restrictions on wood burning households in Christchurch*.

<sup>3</sup> Johnson, A., Howden-Chapman P., & Equb, S. (2018). *A Stocktake of New Zealand's Housing*. Available from: <https://www.beehive.govt.nz/sites/default/files/2018-02/A%20Stocktake%20of%20New%20Zealand%27s%20Housing.pdf>

<sup>4</sup> Statistics New Zealand (2016). *Changes in home-ownership patterns 1986-2013: Focus on Māori and Pacific people*. Wellington, New Zealand: Statistics New Zealand Tatauranga Aotearoa

<sup>5</sup> Stats NZ (2016) *Disability and housing conditions: 2013*. Retrieved from [www.stats.govt.nz](http://www.stats.govt.nz)

<sup>6</sup> Mental Health Foundation UK (n.d.). *Housing and mental health*. Retrieved from <https://www.mentalhealth.org.uk/a-to-z/h/housing-and-mental-health>

<sup>7</sup> Mental Health Foundation UK (n.d.). *Housing and mental health*. Retrieved from <https://www.mentalhealth.org.uk/a-to-z/h/housing-and-mental-health>

that has been tacked on to the end rather than being central to the vision. The Canterbury DHB proposes an alternative vision of:

***Community housing as an integral element of housing and wellbeing in Ōtautahi Christchurch***

What do you think about the strategy's priority actions for community housing in Ōtautahi Christchurch?

10. The Canterbury DHB supports the draft strategy's priority actions. We recommend there is additional context and clarity around universal design and physical accessibility and building to mitigate the impact of climate change.

**Universal design and accessibility**

11. Despite the introductory heading *More inclusive community housing*, the draft strategy lacks an explanation of the need for accessible housing set out in Goal 4. Figure 3 shows older people in couple-only households are on the rise and it is well recognised that disability increases with age. The Canterbury DHB recommends that disability and the ageing population are included in the explanation of inclusivity in order to provide context for the importance of universal design and physical accessibility.

12. The Canterbury DHB supports the actions under Goal 3, Objective 1: A sound understanding of community housing need at the local level. In order to fulfil the actions of 'Identify and monitor a sound evidential base of current and future community housing need' and 'Understand and report on current provision,' the Canterbury DHB recommends that all community housing providers should be systematically collecting information on the disability status of applicants and residents, using the Washington Group Short Set of questions. This is now part of NZ census and other national surveys. If information on functional disability status is known, housing can better match community needs.

13. We applaud the commitment of CCC to embedding universal design principles in social housing. The Canterbury DHB recommends that under Goal 4, Objective 1 (Promote good urban design of community housing including universal design principles that recognise physical accessibility, mobility and independence), the action 'Lead the ongoing development of best practice' is made more specific. This could be, for example, by committing to the Lifemark approach for accessible



design. While accessibility can be done well, the biggest challenges are in the smallest residences. For example, accessible toilets need a certain amount of space. Narrow doors and hallways, and steps at front and rear entrances, are a problem unless solutions are 'designed in'. The Canterbury DHB recommends that the Council state its commitment in this document.

14. The Canterbury DHB supports the commitment to 'streamlining' planning requirements for community housing – but we have some concern about the actions under Goal 3, Objective 5 (Advocate for reducing and streamlining planning requirements for community housing) that, unless specifically protected against, may result in low quality, inaccessible housing. It is important in streamlining and fast-tracking consenting and compliance services, quality and design, including universal design and accessibility, are not compromised. This risk could be mitigated by the Council having in-house technical accessibility expertise, to ensure that accessibility considerations are central to this objective.

### Climate change

15. The Canterbury DHB notes that the discussion of climate change in *Wider challenges: climate change, pandemics and resilience* relates primarily to inundation and sea level rise and associated threats and stressors for residents. While these are important considerations, we note there are other key considerations for housing relating to climate change, such as the need to build zero net energy of passive homes to reduce energy use and carbon emissions.<sup>8</sup> The Canterbury DHB recommends this context is included in the draft strategy and incorporated into Goal 4 in relation to design considerations for community housing.
16. Canterbury has recently experienced a heatwave (defined as when temperatures are 5 degrees Celsius above the average for a given time of year). This may be one of the impacts of climate change we are already experiencing and the Canterbury DHB recommends that community housing design mitigates against over-heating as well as protection from cold.

How active do you think the Council should be in either delivering and/or supporting community housing?

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<sup>8</sup> MBIE. *Building for Climate Change*. Available from: <https://www.mbie.govt.nz/building-and-energy/building/building-for-climate-change/>

The Canterbury DHB supports the Council being an active player in the delivery and support of community housing in Ōtautahi.

**Conclusion**

17. The CDHB does wish to be heard in support of this submission.

18. Thank you for the opportunity to submit on the Draft Community Housing Strategy 2021-2030

**Person making the submission**



Dr Anna Stevenson  
Public Health Specialist

Date: 19/11/2020

**Contact details**

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		<p>people.</p> <p>9 Under Goal 4: agree with all action points, particularly the last point about working with the community housing sector to promote specialised housing models.</p> <p>10. Goal 5: first priority around supporting emergency and transitional housing. This is an area that is already being provided by central government- and highlights the need for a closer common 'place-based approach' to community housing in Christchurch that is developed jointly by central and local government, working with iwi, CHPs etc.</p>			

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35762	<p>Community Housing Aotearoa supports the suggestion made by Christchurch Methodist Mission to change the phrase to: Community housing which promotes wellbeing as a cornerstone of housing in Ōtautahi Christchurch.</p> <p>We fully support the intent of the statement however phrased, including the in the Vision listed on page 11 of the consultation document of "Community housing is the cornerstone of housing provision in Christchurch". We believe that everyone has the right to a decent home that is warm, safe, dry and affordable. With the safety and security provided by a home families have the platform to achieve wellbeing for themselves and the broader community of Christchurch.</p>	<p>Community Housing Aotearoa acknowledges CCC for updating its housing strategy and for the focus on ensuring that there is a range of affordable and other types of housing so that All New Zealanders are well housed. In addition to our comments below, Community Housing Aotearoa (CHA) also supports the submission made by Christchurch Methodist Mission.</p> <p>The right to housing as defined in international law needs to be highlighted in the principles rather than one of the goals. This approach would apply more broadly to all housing in Christchurch and not just community housing. The recently released consultation document on the Guidelines on the right to a decent home in Aotearoa by the NZ Human Rights Commission provides a framework to measure the progressive realisation of this right.</p> <p>We believe the five goals, associated objectives and actions outlined in the strategy are appropriate. The starting point should be from a baseline housing needs assessment that provides detailed information on the housing types, sizes and levels of affordability required for different populations. Too often Christchurch is characterised as 'affordable' in comparison to other cities in New Zealand using median incomes and home prices. These high level figures mask the deep needs and struggles experienced by lower income households.</p> <p>We encourage the Council to work in partnership with the Greater Christchurch Partnership and central government to achieve these. Christchurch City sits within a housing market that stretches beyond its own borders and the largest landlord is Kainga Ora. It is critically important to establish a shared strategy for addressing the housing needs of both the city and the surrounding communities.</p> <p>Central government policy and funding decisions will be critical to the realisation of the strategy. The ability to develop mixed-income, mixed-tenure communities in close proximity to community hubs, transport and services requires close collaboration to ensure investment is made in community facilities and services. In addition, the ability to develop new tools such as inclusionary zoning and placing limitations on private covenants that work against the goals and objectives requires central government legislation.</p>	<p>Community Housing Aotearoa supports the submission of the Christchurch Methodist Mission that: The Council should remain active in both delivering and supporting community housing- but needs to be doing this as a partnership with central government, local government, iwi and the community housing providers. The CCC should provide the 'settings' which encourage and promote good quality community housing which meets the needs of those who are currently excluded from the private housing market, paying particular attention to the needs of Māori, Pasifika, older people, youth, people with disabilities and those who may require additional support due to addictions or mental health issues.</p>	<p>Community Housing Aotearoa</p> <p>Role: Deputy Chief Executive</p>	<p>Chris Glaudel</p>

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		<p>Building code changes will be needed to meet the climate change, sustainability and warm, safe, dry actions.</p> <p>We agree that Council should ensure that its regulatory and consenting processes are efficient and supportive of community housing provision. Prioritising community housing developments will reduce costs. An area we encourage you to emphasise is further partnership with Te Ngāi Tūāhuriri Rūnanga on the delivery of Kāinga Nohoanga. The housing outcomes for Māori across New Zealand and within Christchurch are poorer than those of European descent. Enabling the development of Kāinga Nohoanga can begin to change this deliver on the wellbeing statements in the strategy.</p> <p>Combining regulatory approaches with fiscal supports such as Council land and resources to finance them will support a range of community housing. These supports can include continuation of the current development contribution (grant) policy, access to below market capital, long term leases and other innovative approaches. Where land or finance is provided we encourage Council to ensure long term retention of the housing created.</p> <p>The prevention goal needs to focus on the delivery of long term affordable rental homes as the solution. Households who do not qualify for social housing, yet cannot afford market rents are spending over 50% of their income on housing in many cases. This is unsustainable. There needs to be a focus on ensuring that there is sufficient housing supply so that the amount of emergency and transitional housing is reduced and is sufficient to support the goal of homelessness becoming rare, brief and non-recurring.</p> <p>In addition, there is a large and growing number of households reaching retirement age as renters who are not well-served under current central government policy settings. Some of this need could be met through specialised housing models which the community housing sector delivers. But more support will be required to deliver at the scale needed to address demand.</p>			

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35810	<p>OCHT supports the draft housing strategy's vision as it reflects and supports work already happening in the community housing sector, while supporting the facilitation and ongoing provision of community housing. This will help get people into adequate housing - a human right recognised by our government and in its commitment to the aims of the United Nations.</p> <p>The draft strategy supports the principles of Housing First, in which providing a person a home provides opportunities for a person to thrive.</p> <p>We see it as positive that your vision recognises housing provision AND the impact housing has on people and communities, while recognising the various segments of the Housing Continuum.</p> <p>We note that without any targets this document appears aspirational only. Targets would elevate the strategy.</p>	See attached	<p>ŌCHT supports the Christchurch City Council being involved in policies and advocacy that supports community housing, but not in the delivery of tenancy services. There is merit in the community housing sector operating community housing as providers can access rental subsidies and operate in an agile fashion with arguably more opportunities to attract external grants and philanthropic funding. There is an established community housing sector regulated by central government and operating in the NGO space. This allows for greater connectivity and navigation to community partners needed to help tenants live well in their homes and communities.</p>	<p>Otautahi Community Housing Trust</p> <p>Role: Tenancy Relations Manager</p>	James Hadlee
35775	<p>The right drivers appear to be in place. Many of the numbers are light because the private market is failing. There doesn't appear to be much awareness of the current private market failure and the drivers of such (in the draft policy). This isn't a large issue because the draft does appear to have a robust enough response to the issues that we can work on the issues in an agile way over time.</p>	<p>The strategy is broad enough that it captures the key issues and stake holders. There is a realisation that with so much stock built in the 1970's we're heading into a massive refresh program. Councils understanding of why it has to be involved in social housing appears to be well understood. It will be up to the community to help drive that awareness into the minds of elected members and hold it there.</p>	<p>My response to this question is well documented here:  <a href="https://oursocialhousing.nz/why-do-we-need-ccc-social-housing">https://oursocialhousing.nz/why-do-we-need-ccc-social-housing</a></p> <p>In short, everyone in our community needs choice. The government has created the CHP framework to meet this need. Many CHP's are aligned with churches. CCC has a role in providing for the whole community and driving housing that is not faith based in whole. It also has to help support faith based housing too.</p> <p>The private market is significantly failing at the low end of the market. While central government has a role in addressing this, it is our civic leadership which is most responsible to focus on the citizens of our city.</p> <p>Some will argue that it's not the states or civic role to deliver housing. I could counter that it is a civic role to protect the private investment market from the kind of direct attack that failing to house a segment of our community costs. We read story after story of people</p>	<p>oursocialhousing.nz - advocay groups, CDR Housing Group</p> <p>Role: advocate/director/trustie</p>	Don Gould



## ŌCHT Submission on CCC Draft Housing Strategy

**What do you think about the strategy's vision of 'community housing as a cornerstone of housing in Ōtautahi Christchurch for our wellbeing'?**

OCHT supports the draft housing strategy's vision as it reflects and supports work already happening in the community housing sector, while supporting the facilitation and ongoing provision of community housing. This will help get people into adequate housing - a human right recognised by our government and in its commitment to the aims of the United Nations.

The draft strategy supports the principles of Housing First, in which providing a person a home provides opportunities for a person to thrive.

We see it as positive that your vision recognises housing provision AND the impact housing has on people and communities, while recognising the various segments of the Housing Continuum.

We note that without any targets this document appears aspirational only. Targets would elevate the strategy.

## What do you think about the strategy's priority actions for community housing in Ōtautahi Christchurch?

ŌCHT summarises our feedback here:

Goal 1 - Cornerstone : community housing is a key infrastructure ingredient to community wellbeing		OCHT Response
Community housing provision is a key consideration in Council plans and policies	Social and economic sustainability is a key consideration in community housing provision and maintenance	ŌCHT agrees this is a key consideration to ensure sustainability.
	Continue to include community housing as a key priority in climate change 'just transition' planning	Fully support. If community housing is a priority, targets – rather than objectives – are needed.
	Future-proof new developments with respect to climate change and other environmental and health hazards	Fully support.
	Identify minimum community housing requirements in housing developments	ŌCHT supports this on the basis it will create inclusive communities. Inclusionary zoning, as per Queenstown Lakes District, comes with a target – this will be the only way to ensure community housing is included in private residential developments.
	Prioritise locating new community housing developments close to community hubs, transport and services	ŌCHT supports this. It is important for tenants to access key amenities within close proximity.
Identify and demonstrate the co-benefits of community housing	Carry out a 'wellbeing' benefit-cost assessment	Do not support. A Council does not have a role in assessing the well-being of tenants – that's the role of a social landlord. Local government does not have access to community tenants that are part of CHPs.





	Promote the benefits of community housing	Fully support. It is beneficial to increase the provision of housing in the community housing sector.  To enhance this, the policy objective should be “to promote the benefits of community and affordable housing”.
	Advocate for multi-tenure outcomes in housing regeneration	ŌCHT supports this, recognising the need to balance funding objectives against the operational practicalities of mixed tenure. It will be important to consider typology, spatial placement, and ratio in each redevelopment.
Deliver community and tenant involvement in decision-making on housing redevelopments	Ensure engagement with the community during housing redevelopments	Do not support. Council does not has a role in specific community engagement with new community housing developments. This is the specialist role of community housing providers.
<b>Goal 2 - Community Integration : Community housing is part of a mixed housing, mixed-tenure approach in housing developments</b>		<b>OCHT Response</b>
Advocate for the requirement of community housing and affordable housing in housing developments	Work with central government and LGNZ to develop guidelines	ŌCHT fully supports this action if it leads to additional supply of community housing.
	Work with other forums in the housing sector	Support.
Encourage and incentivise a range of tenure and housing models by the community housing and private sectors	Identify and determine support for successful and emergent models such as community land trusts	ŌCHT fully supports this action if it leads to additional supply of community housing.
	Incentivise the community housing and private sectors	ŌCHT fully supports this action if it leads to additional supply of community housing. Identifying targets to be met is required
	Identify patient capital opportunities	ŌCHT fully supports this action if it leads to additional supply of community housing.

	Ensure the utilisation of Council land and resources supports and retains a range of community housing	ŌCHT fully supports this action if it leads to additional supply of community housing. Identifying targets to be met is required.
<b>Goal 3 - Capacity : Support Council and community housing provider capacity to deliver community housing</b>		<b>OCHT Response</b>
A sound understanding of community housing need at the local level	Identify and monitor a sound evidential base of current and future community housing need	Do not support. ŌCHT suggests this information is a central government and sector peak bod responsibility. I e. MHD, Community Housing Aotearoa. Council's role is better suited to long term strategic policy. Central government should monitor future community housing need.
	Understand and report on current provision	Do not support as this duplicates the role already undertaken by MHUD and MSD
Restore the amount of Council's housing stock to its pre-quake level	Sustainably fund and/or support new Council and/or CHP units	Fully support this action.
Promote delivery models for the provision of community housing at scale	Investigate local authority options such as CCO models	Conditional support, if community housing providers retain their independence as per 2014 housing regulations and if the action ensures the longevity of community housing provision in Ōtautahi
	Develop capital models that support CHPs	Fully support this action if it leads to additional supply of community housing.
	Identify and evaluate funding and financing options to support the increased supply of community housing to meet current and expected demand	Fully support this action if it leads to additional supply of community housing.  We note it may not be Council's role to evaluate financing options for independent community housing providers.
Actively support community housing providers through a range of development models	Identify partnerships and models that support delivery of community housing	Fully support this action if it leads to additional supply of community housing.



Advocate for reducing and streamlining planning requirements for community housing	Identify consenting guidelines and checklists that encourage community housing	This action is supported if it fits within a local government purview. I/e. Will consenting become less burdensome because local government pre identifies compliance requirements. We would Support this action to reduce time and cost in creating community housing supply.
	Apply wrap-around consenting and compliance services that minimise building timeframes	As above. Support this action to reduce time and cost in creating community housing supply.
	Develop fast-track processes to progress community housing consents to 'shovel ready' status	As above. Support this action to reduce time and cost in creating community housing supply.
<b>Goal 4 - Provision : Community housing is provided in Christchurch that meets the human-rights based ' housing adequacy; threshold</b>		
		<b>OCHT Response</b>
Promote good urban design of community housing including universal design principles that recognise physical accessibility, mobility and independence	Lead the ongoing development of best practice	This needs to be reconsidered. Council’s planning regime treats community housing providers as if they are any private developer. Urban design panels add cost and not always value.
Housing Adequacy is a key consideration in investing in Council’s housing	Carry out asset management planning to ensure prudent investment contributes to meeting housing adequacy	OCHT recognises the need for robust asset management and supports short term reinvestment into the social hosing portfolio to increase the quality of existing homes or accelerate replacement of older homes. However,r community asset planning is not a core role of Council and can be undertaken by the operator.
	Taking opportunities to support, advocate, and lobby for improved quality of community housing	As above.
	Take a leading role in wider policy changes and legislative change where there are community and sector-wide benefits	Partially support. ŌCHT sees the Council’s advocacy role as admirable but cautions against any decision increasing administration through increased regulation or legislation.

	Delivering warm, dry and safe housing	Fully support from a policy perspective. Every person has the right to access adequate housing.
Research and identify specialised housing for specific demographic groups	Work with the community housing sector to promote specialised housing models	Do not support. This is an operational function on which community housing providers work with Community Housing Aotearoa. CHPs have the capability to respond to specific demographic requirements.
<b>Goal 5 - Prevention : Preventative action to ensure secure, stable tenancies which build community connections and wellbeing</b>		<b>OCHT Response</b>
Support the provision of a range of models for more immediate access to emergency and transitional housing	Work with the community sector to identify and support related housing models	Do not support. ŌCHT supports any increase in the provision of emergency and transitional needs, but sees this as being led by central government. ŌCHT would rather see growth in the supply of community housing to avoid the need to grow transitional housing.
Support people to foster secure tenancies and maintain sustainable communities	Identify best practice to support people to live in their communities across a range of tenures	Do not support. ŌCHT does not see this as a role for Council. Current oversight of community housing, through sector groups and central government regulation, is sufficient.
	Identify opportunities for people to articulate their housing and location preference	Do not support. ŌCHT does not see this as a role for Council. It ought to continue to be managed between MSD, HUD and Community Housing Providers
	Develop the Council's position on tenure security for urban regeneration and redevelopment projects	Partially support local government working with central government as this is a national issue for all tenants. ŌCHT supports recent changes of the Residential Tenancies Act 1986 to improve security of tenure for tenants.



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<p>Advocate for housing need which is not always addressed by community housing policy settings</p>	<p>Identify the extent of community housing need that does not fit within current policy settings</p>	<p>Partially support. ŌCHT supports the Council's advocacy for community housing through its role as a member of Community Housing Aotearoa.</p>
<p>Ensure that income based affordable rental guidelines are applied in Council owned or leased housing</p>	<p>Establish and monitor affordable rental guidelines in alignment with Government policies</p>	<p>Do not support. ŌCHT believes this falls outside the purview of Council and is best managed by community housing providers' own rent-setting policies, alongside MSD and HUD through the operation of Income Related Rents already legislated by central government.</p>

**How active do you think the Council should be in either delivering and/or supporting community housing?**

ŌCHT supports the Christchurch City Council being involved in policies and advocacy that supports community housing, but not in the delivery of tenancy services. There is merit in the community housing sector operating community housing as providers can access rental subsidies and operate in an agile fashion with arguably more opportunities to attract external grants and philanthropic funding. There is an established community housing sector regulated by central government and operating in the NGO space. This allows for greater connectivity and navigation to community partners needed to help tenants live well in their homes and communities.

## Organisations

Submission ID	What do you think about the strategy's vision of 'community housing as a cornerstone of housing in Ōtautahi Christchurch for our wellbeing'?	What do you think about the strategy's priority actions for community housing in Ōtautahi Christchurch?	How active do you think the Council should be in either delivering and/or supporting community housing?	Name of organisation	Name
			<p>begging out side our business areas, this in part because they don't have homes they would prefer to be in. Our insurance costs are higher because of meth contamination in private market housing that has cost millions to repair and damaged the capital values. For members, Stephen and I created with website to help understand social housing stock in our city: <a href="https://oursocialhousing.nz">https://oursocialhousing.nz</a></p>		
35763	I think this NEEDS to happen.	Very relevant and keep the actions going	Keep on doing as it is and they get a bit more involved	P1st Role: Advocate	Simon Atkinson

## Organisations

Submission ID	What do you think about the strategy's vision of 'community housing as a cornerstone of housing in Ōtautahi Christchurch for our wellbeing'?	What do you think about the strategy's priority actions for community housing in Ōtautahi Christchurch?	How active do you think the Council should be in either delivering and/or supporting community housing?	Name of organisation	Name
35813	<p>The Waihoru / Spreydon-Cashmere Community Board appreciates the opportunity to provide a submission on the Council's Draft Community Housing Strategy.</p> <p>The Board's statutory role is, "to represent, and act as an advocate for, the interests of its community" (Local Government Act 2002, section 52). The Board provides this submission in its capacity as a representative of the communities in the Spreydon-Cashmere area.</p> <p>The Strategy notes that the Council has a variety of community housing roles as a provider, advocator and supporter. It may be that the use of the term community housing, which is a general term for the provision of social housing by a number of different agencies, fudges the specific public role of Christchurch City Council as local government as a key provider of social housing. The Board strongly believes that the Council should continue to provide at least 20% of the city's social housing so that it leads by example. In addition, we would like more clarity on the Council's other roles as advocator and supporter so that accountability is clear.</p>	<p>The Board supports the Strategy's five proposed goals. We also propose the following additional goals:</p> <ul style="list-style-type: none"> <li>• <b>Accessibility:</b> Community housing should meet the standard of Lifemark 5 so it is accessible for all stages of life and levels of ability and disability. Tenants should be able to age well within their existing homes and providers should be planning for our ageing population.</li> <li>• <b>Housing Continuum:</b> Community housing is part of the wider housing continuum that should also provide pathways on a ladder towards home ownership. All community housing, including that provided by the Council, should enable gateways towards other housing tenures and / or home ownership. It should therefore include rent-to-buy schemes (and others) to make home ownership more accessible for all.</li> <li>• <b>Partnership:</b> Community housing providers, including the Council, should work closely with the Government to build a partnership strategy for community housing.</li> </ul> <p>For example, the Government could pay a community housing provider the Income Related Rent Subsidy (IRRS) in advance to fund the building of more community housing units more quickly. Building more housing more quickly is essential to meet the significant increase in demand (62%) for community housing by 2048 alongside the urgent need to replace ageing and poor quality housing stock.</p> <ul style="list-style-type: none"> <li>• <b>Tenure Mix:</b> Providers should deliver a mix of housing tenures types, especially on the larger developments (that is, community, affordable (rent-to-buy) and market housing) in order to promote successful communities over time.</li> <li>• <b>Wellbeing:</b> Community housing should provide both housing infrastructure and services for tenants that promote wellbeing.</li> </ul>	<p>The Council, in its provision of social housing, should protect its social and financial investment by providing wraparound services that support tenants, successful tenancies and neighbourhood relationships. Further to that, as partners with other providers of community housing, they should encourage partnerships across providers, not only with one another but also with the District Health Board, Ministry of Social Development, Whanau Ora, etc.</p>	<p>Waihoru / Spreydon-Cashmere Community Board</p> <p>Role: Chairperson</p>	<p>Karolin Potter</p>
35673	<p>Refer attached submission</p>	<p>Refer attached submission</p>	<p>Refer attached submission</p>	<p>Waimāero/Fendalton-Waimairi-Harewood Community Board</p> <p>Role: Manager Community Governance</p>	<p>Maryanne Lomax</p>

## Submission #35673

Draft Community Housing Strategy 2020-2030

Date: 2 November 2020

To: Christchurch City Council

From: Waimāero/Fendalton-Waimairi-Harewood Community Board

Contact: David Cartwright  
Chairperson  
C/- PO Box 73020  
Christchurch 8154  
Phone: 027 496 5977  
Email: david.cartwright@ccc.govt.nz

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### Introduction

1. The Waimāero/Fendalton-Waimairi-Harewood Community Board ('the Board') appreciates the opportunity to submit on the Council's Draft Community Housing Strategy 2020-2030.
2. The Board does not wish to be heard in support of its submission.

### Comments

3. What do you think about the strategy's vision of 'community housing as a cornerstone of housing in Otautahi Christchurch for our wellbeing'?

The Board supports in general the vision of the draft Strategy's, however it would be interested to gain a better understanding of how 'wellbeing' will be measured. The Board would also like to know whether the key priority is around longer term 'stable' tenancies or short term emergency and transitional housing e.g. what is the ideal mix of the two.

4. What do you think about the strategy's priority actions for community housing in Otautahi Christchurch?

The Board recommends that a regular maintenance/upgrade schedule for community housing properties owned by the Council be factored into all Long Term Plan/Annual Plan expenditure to ensure the housing stock remains fit for purpose.

The Board also strongly supports the use of new and modern technologies and techniques, both in construction design and sustainability, when future developments are being constructed. Having warm, energy efficient and fit-for-purpose housing will contribute towards wellbeing and will futureproof the Council's investment.

5. How active do you think the Council should be in either delivering and/or supporting community housing?

The Board acknowledges the Council's role in the provision of social housing in Christchurch for the past 80 years. The Board strongly supports the more recent model of working in partnership with other housing providers e.g. Otautahi Community Housing Trust. The Board encourages the Council to continue to investigate other potential partnership models which may result in the Council eventually divesting in the ownership of the assets.



## Submission #35673

The Board supports the Council advocating for reducing and streamlining planning requirements for community housing and recommends that it be open to work with commercial building owners/developers to repurpose existing buildings into community housing.

### 6. General Comments

The Board stresses the importance of consultation with the local community when new Community Housing developments and significant upgrades to existing Community Housing developments are planned. It is also aware that from time to time there are issues with the neighbouring residents and it would like to see a clear process for dealing with any complaints.

In closing, the Board acknowledges that the provision of community housing contributes to the Council's Community Outcomes, particularly Liveable City and Resilient Communities. The Board would also like the Council to consider aligning the Community Housing Strategy to the United Nations 17 Sustainable Development Goals, for example SDG11 Sustainable Cities and Communities, SDG3 Good Health and Wellbeing, SDG9 Industry Innovation and Infrastructure.

A handwritten signature in black ink, appearing to read 'David Cartwright', with a stylized flourish at the end.

David Cartwright  
Chairperson  
Waimāero/Fendalton-Waimairi-Harewood Community Board

## Organisations

Submission ID	What do you think about the strategy's vision of 'community housing as a cornerstone of housing in Ōtautahi Christchurch for our wellbeing'?	What do you think about the strategy's priority actions for community housing in Ōtautahi Christchurch?	How active do you think the Council should be in either delivering and/or supporting community housing?	Name of organisation	Name
				- Fendalton-Waimairi-Harewood	
35708	The Board supports the Council's vision of "community housing as a cornerstone of housing in Ōtautahi Christchurch for our wellbeing," noting the changing patterns of Christchurch home ownership and renting in general.	The Board supports the Council's priority actions for community housing in Ōtautahi Christchurch.	The Council should be active in delivering and supporting community housing including: <ul style="list-style-type: none"> <li>• developing a range of tenures, such as leasing and cooperative models</li> <li>• working collaboratively with other providers to ensure stock is provided to meet the demand</li> <li>• collaborating and advocating with the Government in relation to policy settings and funding for community housing</li> <li>• replacing and upgrading existing stock as required.</li> </ul>	Waipapa/Papanui-Innes Community Board  Role: chairperson	Emma Norrish
35780	See attached submission.	See attached submission.	See attached submission.	waipuna Halswell Hornby Riccarton Community Board  Role: Community Board adviser	Faye Collins

**SUBMISSION TO:** Christchurch City Council  
**ON:** **Draft Community Housing Strategy**  
**BY:** Waipuna/Halswell-Hornby-Riccarton Community Board  
**CONTACT:** Faye Collins  
Community Board Adviser  
[faye.collins@ccc.govt.nz](mailto:faye.collins@ccc.govt.nz)

## 1. INTRODUCTION

The Waipuna/Halswell-Hornby-Riccarton Community Board (“the Board”) appreciates the opportunity to make a submission on the Christchurch City Council’s (“the Council”) Draft Community Housing Strategy (“the Strategy”).

This submission was compiled by the Board’s Submission Committee under the delegated authority granted by the Board.

The Board **wishes to be heard** in support of its submission.

## 2. SUBMISSION

### 2.1 Introduction

The Board acknowledges the Council’s long history as a provider of social housing in Christchurch. It accepts that changes in economic and social policy in a market economy setting have placed increasing demand on both public and affordable housing that the market alone is not meeting. The Board acknowledges that in light of this the Strategy seeks to reframe public or social housing more inclusively as community housing, to place it as a central housing requirement (i.e. as a cornerstone of communities and as key social infrastructure, at the forefront of housing provision and ongoing urban regeneration).

### 2.2 COMMENTS

#### 2.2.1 Vision: Community housing as a cornerstone of housing in Ōtautahi Christchurch for our wellbeing

The Board recognises the Strategy extends beyond social housing to cover community housing defined as:

A form of assisted or non-market housing working alongside private housing in the open market, meeting housing need through a range of social and affordable rental and home ownership options. Community housing complements and includes the public (or social) housing traditionally provided by central or local government, and other community providers.

The Board supports the vision of the strategy that sees Community housing as the cornerstone of housing provision in Christchurch.

The Board agrees that:

- Community housing is vital to the wellbeing of people and their communities;
- Community housing is critical social infrastructure in Christchurch;

- Community housing is part of the city's fabric;
- The Council has an advocacy and leadership role in community housing;
- Collaborative partnerships are key to successful community housing.

### **2.2.2. The Council's role in delivering and/or supporting community housing?**

The Board supports the Council as a direct provider of community housing to at least the current level of provision. In addition the Board sees roles for the Council as a supporter, enabler, advocate and leader for community housing. It agrees that collaborative partnerships with the Government, the CHP sector and the development sectors will be key in creating funding and provision models for locally led community housing. The Board believes that this represents the Council's long-term interest in the wellbeing of residents.

While the Board generally agrees with the mixed tenure model envisaged in the Strategy that will provide a mix of housing types and tenures it cautions that clear policies on land sales and valuation for social benefit to provide clarity will be required and protections put in place to ensure that housing opportunities subsidised by the Council do not result in profit for individuals at the expense of the community housing sector.

The Board prefers a rates neutral approach to the provision of community housing.

### **2.2.3 Priority actions**

The Board supports priority actions for community housing in Ōtautahi Christchurch identified in the Strategy to support the Strategy's Goals and Objectives.

## **5. CONCLUSION**

The Board requests that the council considers the matters set out above in relation to the Draft Community Housing Strategy.



Debbie Mora

**Chairperson** Waipuna/Halswell-Hornby-Riccarton Community Board  
Submissions Committee



Mike Mora

**Chairperson** Waipuna/Halswell-Hornby-Riccarton Community Board

## Individuals

Submission ID	What do you think about the strategy's vision of 'community housing as a cornerstone of housing in Ōtautahi Christchurch for our wellbeing'?	What do you think about the strategy's priority actions for community housing in Ōtautahi Christchurch?	How active do you think the Council should be in either delivering and/or supporting community housing?	Name
35785	I agree with it entirely.	<p>The Strategy has a huge range of Goals, Objectives and Actions, but far too few of the actions are sufficiently specific. They need to be accompanied by SMART objectives and associated actions (Specific, Measurable, Achievable, Relevant and Timebound). Otherwise they become a statement of aspirations only.</p> <p>While I support the aspirations, I want to know how it is intended that they be achieved, Who is going to do what when, and have the necessary resources been allocated.</p> <p>For example:</p> <p>"Goal 2: Encourage and incentivise a range of tenure..... Incentivise the community and housing and private sectors"</p> <p>Suggested Objective: Staff to develop a range of incentives for the private sector by June 2021, and secure council agreement to fund those incentives:</p> <p>Goal 3: "Promote delivery models for the provision of Community Housing at scale: Investigate options; Develop capital models that support CHPs; Identify and evaluate funding options".</p> <p>Suggested Objective: Staff to provide a paper to councillors by June 2021 which describes options for the provision of Community Housing at Scale, and proposes a role for council in funding these.</p>	Very. But I want to see it's role much more in assisting CHPs to provide social housing and innovative private groups to provide community housing (co-housing). Goals two and three.	Geoffrey Butcher
35767	This is the way which I wish to see implemented.	<p>Build a sufficient number of community houses for all who need them.</p> <p>Repair those that are currently damaged and not in use.</p> <p>Re-open those that are undamaged but not being used by those who qualify to rent them</p>	<p>CCC SHOULD OWN AND MANAGE ALL COMMUNITY HOUSING.</p> <p>Outautahi Community Social housing Trust, has failed spectacularly to discharge its task.</p> <p>it was badly undercapitalised by CCC at its inception WHICH IS a major reason for its failure.</p> <p>N B. Recently Oxford Tce; Baptist Church bought back to its ownership its community houses which it sold to OCSHT</p>	Denis O'Connor
35766	Generally in favour of it.	I would like to see more emphasis placed on building accessible housing. I would also like to see more options for alternative housing and financial arrangements, eg. co-housing and housing co-ops.	Very active. Council should take a leading role in ensuring adequate affordable and accessible housing for the community.	Andrew Hey
35750	Ok	Could not see what this question refers to	Very active. Taking leadership. Looking to our future needs. Taking long term view	Rosemary Neave

35749	I support it.	Positive but not aspirational enough. I would like community housing to reflect cultural diversity (eg multi generational family living), and would like community housing to be dispersed and mixed amongst areas of other residential housing, rather than being concentrated together. I would also like all community housing to meet the Healthy Homes standard as an absolute minimum, but preferably exceed these so that our most vulnerable residents do not live in housing that will make them sick, or increase their exposure to risk.	The Council should be an active investor with resident wellbeing defining success. The delivery and management of housing should be outsourced to not-for-profit or social enterprise organisations with the right mix of property expertise, pastoral values and kaupapa for positive social outcomes.	Sina Tait
35736	A warm, dry home at a reasonable rent is crucial to a family's well being. From new arrivals to the country or the elderly, not everyone can afford their own home. Also the placement of nearby shops and eating places is important . I dont think council should be allowing zone changes to let big shopping developments be built on the outskirts of town when there are empty shops in the city where there are lots of people who then have to travel to shops. More cars on the road and petrol pollution.		I think a lot of young people are in unhealthy flatting situations because of high rents. I think blocks of single people accomodation at a reasonable rent would be appreciated by many young people who would appreciate the independence.	Dorothy Webster
35606	I think it is a disgrace. This is a central Government function, not a local Government function. Focus on core infrastructure and keeping rates low. Leave community housing to central Government.	I think it is a disgrace. This is a central Government function, not a local Government function. Focus on core infrastructure and keeping rates low. Leave community housing to central Government.	Stay out of public / community housing. This is a central Government function, not a local Government function. Focus on core infrastructure and keeping rates low. Leave community housing to central Government.	Andrew McKay
35587	Yes I agree . People need a secure, warm dry place to live. It is a basic human right. This is more important than financing a stadium or repairing lots of heritage buildings. A lot of modest housing units used by disadvantaged people were destroyed in the earthquakes. Now they need to be all replaced.	I agree. The City council needs to increase its build capacity until all the units lost or damaged are replaced. Then there needs to be planned ongoing acquisition of housing, to address the increasing need for affordable rental accommodation.	The Council needs to be very active in both functions. We can't leave it to the private sector to build homes for low income and disabled people.  I do not agree with subsidising developers who are building expensive inner city apartments.  I would like to subscribe to a Housing bond investment, for social units in Christchurch.	Yvonne Susanne Dixon
35573	I would to see my accessibly housing as in Canterbury there is a luck of accessibly housing  the government is only building 0.4 in NZ  it time someone takes up this to more build to many young people who have disability are living rest homes	It is good I would like to see the community housings to have Solar Panels  this would help cover some of the heating cost over the winter	I would to see the council and /or Ōtautahi Christchurch  build community housing in the CBD this would bring life the CBD over the weekends  The council could a mandate to Ōtautahi Christchurch to build community housing in the CBD for family's only  Council need's to support the Youth Housing Hub it would support youth people bring them back on the rails	Shane McInroe McInroe

35216	Its a great plan. Allowing low income earners or beneficiaries the chance to improve their life and have the option to own their own home. This is highly needed given mosy home owners are elderly, familys, older couples and young people may struggle to achieve this on their own without the support.	Its a good starting point. Theres needs to be support and clear rules for all owners. If they include cosmetic appearances for the property then give assistance and not expect low earners to pay for it. Ensure they're private so people have a quiet space indoors and out. Allow for carparking and enforce the rules if theyre not adhered to.	Very. We are short on social housing. If the property doesnt suit ur needs its really touch to transfer. Provide support for those with mental health especially aftet covid. We need to support one another to progress and become self sufficient, instead of giving them hurdles.	Abbie Dyer
35153	I think the vision is robust. I feel, however, that there will be more rent stressed sector than estimated and that there needs to be more community housing available by at least half again of what is proposed.	This point is defiantly number one; Prioritize locating new community housing developments close to community hubs, transport and services. And each project should be a Mixed community housing profile as best fits the particular community where they are placed.	The Council should be highly active in supporting community housing for the betterment of Greater Christchurch. Reading the description of how funding is applied by government (at present) it looks as though developments would get more funding if not run/owned by Council, therefore it makes better sense to have a set up where an organization can get full relevant funding to support more developments of community housing.	Jillian Reesby