

**IN THE MATTER OF** The Local Government  
Act 2002

**AND**

**IN THE MATTER OF** A submission by Housing  
New Zealand Corporation  
on the Christchurch City  
Council draft Annual Plan  
2007-2008

To: Christchurch City Council  
Freepost 178 Annual Plan  
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**SUBMISSION BY HOUSING NEW ZEALAND CORPORATION ON  
DRAFT ANNUAL PLAN 2007-2008**

**HOUSING NEW ZEALAND CORPORATION** ("HNZC") at the address for service given below makes the following submission on the Christchurch City Council ("the Council") draft Long-term Council Community Plan 2006-2016 ("LTCCP"):

**Background**

1. HNZC has made submissions in the past on the Christchurch City Council LTCCP.
2. Previous submissions have provided the detailed objectives and functions of HNZC.
3. In achieving its objectives and performing its functions, HNZC is empowered to work with local authorities and other persons and organisations.
4. HNZC emphasises to Christchurch City Council that, as a housing provider, it does not operate for the purpose of profit and is constrained by statutory imperatives to deliver outputs in a socially responsible manner.

5. HNZC wishes to emphasise the importance of distinguishing, yet providing for, the difference between social housing on the one hand and affordable housing on the other.
6. “Social housing” means not-for-profit housing programmes that are supported, but not necessarily delivered, by government, to help low and modest income households and other disadvantaged groups to access appropriate, secure and affordable housing.
7. “Affordable housing” means housing appropriate for the needs of low and moderate income households and priced so that low and moderate income households are able to meet other essential living costs.

### **Community Support**

8. HNZC supports Christchurch City Council’s commitment to providing community support activities in Christchurch and its provision of community grants.
9. In addition, HNZC supports the Council’s commitment to the provision of social housing and continues to offer support to the Council to meet its social housing objectives as detailed in the Council’s draft Social Housing Strategy and HNZC’s submission to that strategy.
10. HNZC remains available to work alongside the Council to ensure that both organisations are working in concert, addressing housing needs throughout Christchurch City in response to current requirements and planning for requirements in the future.

### **Rates**

11. Any increase to rates has an adverse impact upon HNZC and other third sector organisations to provide quality social housing and contribute to community outcomes.
12. As urged in the submissions on the LTCCP, HNZC continues to ask the Council to exercise fiscal prudence on proposals that will result in rates rises and seeks that the Council considers issues surrounding housing affordability in setting the general rate, the uniform annual general charge, and targeted rates.

13. HNZC supports provisions that provide for remission of rates penalties in situations of financial hardship and remission of rates for social and community organisations.

#### **Development Contributions Policy**

14. HNZC notes that the Council intends to amend its development contributions policy through the Annual Plan process.
15. HNZC urges the Council to ensure that it is familiar with the judicial guidance provided in the recent High Court decision of *Neil Construction Limited & Ors v North Shore City Council*.
16. The Annual Plan process is timely in terms of the need for Christchurch City Council to assess the legal validity and sustainability of its development contributions policy alongside the law as now established in the abovementioned case.
17. It is imperative that the Council's methodology is not "causation based" but rather a "benefits based" approach and that development contributions are only levelled at projects which qualify as "developments" in accordance with section 199 of the Local Government Act 2002.
18. HNZC is concerned to ensure that the Council has considered sectoral impacts resulting from development contributions. In particular, HNZC is concerned to ensure that the Council has fully considered the impact of development contributions on the provision of affordable and social housing.
19. HNZC appreciates the opportunity to make this submission and reserves the right to be heard on it.

#### **David Griffiths**

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