



MINISTRY OF SOCIAL DEVELOPMENT
Te Manatū Whakahiato Ora

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15 April 2009

Tony Marryatt
Chief Executive
Christchurch City Council
163-173 Tuam Street
CHRISTCHURCH

Dear Tony

**MSD'S COMMENTS ON THE CHRISTCHURCH CITY COUNCIL'S LONG TERM
COUNCIL COMMUNITY PLAN**

Thank you for the opportunity to comment on the Christchurch City Council's Long Term Council Community Plan (LTCCP) for 2009-19.

As you will be aware, MSD works with the most vulnerable groups in Christchurch. Our vision is an inclusive New Zealand where all people are able to participate in the social and economic life of their communities. This means finding ways to help people get through barriers they may face and make sure they can access the support and services they need to get on with their lives. With this in mind, we have commented on the following aspects of the LTCCP:

- the proposed establishment of the Community Agency for Energy
- the provision of social housing
- parking for people with disabilities

Establishment of a Community Agency for Energy

The LTCCP proposes to establish a Community Agency for Energy to implement the Sustainable Energy Strategy. While we support the promotion of energy efficiency measures, we are concerned that there is no acknowledgement in the Sustainable Energy Strategy that there are significant cost barriers to low income households becoming more energy efficient. This concern was reinforced by recent Christchurch City Council comments to the media that people with uninsulated homes would be 'shamed'.

Nationally, 63 percent of Work and Income clients are in receipt of Accommodation Supplement rent and will therefore be reliant on their landlords to insulate and convert to clean forms of heating. Programmes funded by the Energy Efficient Conservation Authority (EECA) targeting landlords have typically been under subscribed and we anticipate that many of the most inefficient houses in Christchurch will be owned by private landlords.

We would be interested in exploring with the Community Agency for Energy the policy levers the Christchurch City Council could use to improve the quality of rental housing stock in Christchurch. For example, we are interested to know whether existing mechanisms such as

the Housing Improvement Regulations are being fully utilised to ensure that housing quality in the private rental market meets the energy efficiency and quality standards signalled in the Sustainable Energy Strategy.

Low income owner occupiers also face cost barriers to upgrading their homes. While MSD offers recoverable assistance for eligible Work and Income clients to make co-payments for EECA programmes such as those offered by Community Energy Action, many are reluctant to take on debt when their fixed incomes are low. Compounding this problem, many low income owner occupiers will be unable to access the fully subsidised Clean Heat scheme if Environment Canterbury's LTCCP proposals to reduce its funding base are agreed.

Therefore, while we support the establishment of the Community Agency for Energy, we recommend that it works closely with MSD to ensure that the Sustainable Energy Strategy is meaningful and relevant to low income groups.

The provision of social housing

We welcome the commitment to improve the quality of the Council's social housing stock, and anticipate that a particular focus of this upgrade will be ensuring that all homes are warm, dry, and energy efficient.

We also support the acknowledgement in the LTCCP that there are population groups other than the elderly and people with disabilities who may require social housing. MSD Canterbury has identified that young people transitioning from school to education or employment without the support of their parents can have high housing needs. Additionally, Social Report data from 2008 indicates that there is a trend towards increased levels of household overcrowding in Christchurch. The Christchurch City Council's role in the ongoing provision of affordable and high quality social housing is key to the wellbeing outcomes of low income groups in this city.

Parking

We have received feedback from the Disabled People's Assembly that there is insufficient disabled parking around some of our Work and Income service centres. We note that your performance measures do not appear to include criteria to determine whether metered parking is accessible to people with disabilities. We would welcome the opportunity to discuss this further with you to ensure that our clients with disabilities are able to access our services.

Thanks again for the opportunity to comment.

Yours sincerely



Michelle Mitchell
Regional Commissioner