

**ORDINARY MEETING**

**OF**

**STRATEGY AND POLICY COMMITTEE**

**AGENDA**

**Time:** 2:00pm  
**Date:** Wednesday, 5 August 2020  
**Venue:** Ngake (16.09)  
Level 16, Tahiwī  
113 The Terrace  
Wellington

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**MEMBERSHIP**

Mayor Foster  
Councillor Calvert (Deputy Chair)  
Councillor Condie  
Councillor Day (Chair)  
Councillor Fitzsimons  
Councillor Foon  
Councillor Free  
Councillor Matthews  
Councillor O'Neill  
Councillor Pannett  
Councillor Paul  
Councillor Rush  
Councillor Sparrow  
Councillor Woolf  
Councillor Young

**NON-VOTING MEMBERS**

**Have your say!**

*You can make a short presentation to the Councillors at this meeting. Please let us know by noon the working day before the meeting. You can do this either by phoning 04-803-8334, emailing [public.participation@wcc.govt.nz](mailto:public.participation@wcc.govt.nz) or writing to Democracy Services, Wellington City Council, PO Box 2199, Wellington, giving your name, phone number, and the issue you would like to talk about. All Council and committee meetings are livestreamed on our YouTube page. This includes any public participation at the meeting.*

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## **AREA OF FOCUS**

The role of the Strategy and Policy Committee is to set the broad vision and direction of the city, determine specific outcomes that need to be met to deliver on that vision, and set in place the strategies and policies, bylaws and regulations, and work programmes to achieve those goals.

In determining and shaping the strategies, policies, regulations, and work programme of the Council, the Committee takes a holistic approach to ensure there is strong alignment between the objectives and work programmes of the seven strategic areas covered in the Long-Term Plan (Governance, Environment, Economic Development, Cultural Wellbeing, Social and Recreation, Urban Development and Transport) with particular focus on the priority areas of Council.

The Strategy and Policy Committee works closely with the Annual Plan/Long-Term Plan Committee to achieve its objective.

To read the full delegations of this Committee, please visit [wellington.govt.nz/meetings](http://wellington.govt.nz/meetings).

**Quorum:** 8 members

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**TABLE OF CONTENTS**  
**5 AUGUST 2020**

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<b>Business</b>	<b>Page No.</b>
<b>1. Meeting Conduct</b>	<b>5</b>
<b>1.1 Karakia</b>	<b>5</b>
<b>1.2 Apologies</b>	<b>5</b>
<b>1.3 Conflict of Interest Declarations</b>	<b>5</b>
<b>1.4 Confirmation of Minutes</b>	<b>5</b>
<b>1.5 Items not on the Agenda</b>	<b>5</b>
<b>1.6 Public Participation</b>	<b>6</b>
<b>2. General Business</b>	<b>7</b>
<b>2.1 Social Housing Policy Consultation Hearings</b>	<b>7</b>



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## 1. Meeting Conduct

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### 1.1 Karakia

The Chairperson will open the meeting with a karakia.

<b>Whakataka te hau ki te uru,</b>	Cease oh winds of the west
<b>Whakataka te hau ki te tonga.</b>	and of the south
<b>Kia mākinakina ki uta,</b>	Let the bracing breezes flow,
<b>Kia mātaratara ki tai.</b>	over the land and the sea.
<b>E hī ake ana te atākura.</b>	Let the red-tipped dawn come
<b>He tio, he huka, he hauhū.</b>	with a sharpened edge, a touch of frost,
<b>Tihei Mauri Ora!</b>	a promise of a glorious day

At the appropriate time, the following karakia will be read to close the meeting.

<b>Unuhia, unuhia, unuhia ki te uru tapu nui</b>	Draw on, draw on
<b>Kia wātea, kia māmā, te ngākau, te tinana,</b>	Draw on the supreme sacredness
<b>te wairua</b>	To clear, to free the heart, the body
<b>I te ara takatū</b>	and the spirit of mankind
<b>Koia rā e Rongo, whakairia ake ki runga</b>	Oh Rongo, above (symbol of peace)
<b>Kia wātea, kia wātea</b>	Let this all be done in unity
<b>Āe rā, kua wātea!</b>	

### 1.2 Apologies

The Chairperson invites notice from members of apologies, including apologies for lateness and early departure from the meeting, where leave of absence has not previously been granted.

### 1.3 Conflict of Interest Declarations

Members are reminded of the need to be vigilant to stand aside from decision making when a conflict arises between their role as a member and any private or other external interest they might have.

### 1.4 Confirmation of Minutes

The minutes of the meeting held on 23 July 2020 will be put to the Strategy and Policy Committee for confirmation.

### 1.5 Items not on the Agenda

The Chairperson will give notice of items not on the agenda as follows.

***Matters Requiring Urgent Attention as Determined by Resolution of the Strategy and Policy Committee.***

The Chairperson shall state to the meeting:

1. The reason why the item is not on the agenda; and
2. The reason why discussion of the item cannot be delayed until a subsequent meeting.

The item may be allowed onto the agenda by resolution of the Strategy and Policy Committee.

***Minor Matters relating to the General Business of the Strategy and Policy Committee.***

The Chairperson shall state to the meeting that the item will be discussed, but no resolution, decision, or recommendation may be made in respect of the item except to refer it to a subsequent meeting of the Strategy and Policy Committee for further discussion.

**1.6 Public Participation**

A maximum of 60 minutes is set aside for public participation at the commencement of any meeting of the Council or committee that is open to the public. Under standing order 31.3, no request for public participation for this meeting will be accepted as this meeting has been scheduled for the purpose of oral hearings only.

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## **2. General Business**

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# **SOCIAL HOUSING POLICY CONSULTATION HEARINGS**

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### **Purpose**

1. This report asks the Strategy and Policy Committee to recognise the speakers who will be speaking to their submissions regarding the consultation on the proposed changes to the Social Housing Policy and City Housing Policy: Rent Setting.

### **Recommendation/s**

That the Strategy and Policy Committee:

1. Receive the information.
2. Hear the oral submitters and thank them for speaking to their submissions.

### **Background**

2. Wellington City Council began consulting again on the proposed changes to the Social Housing Policy and City Housing Policy: Rent Setting on Tuesday 2 June 2020 and the consultation closed to submissions on Sunday 5 July 2020.
3. During the consultation, every submitter was provided with the opportunity to speak to their submission at one of two Strategy and Policy Committee meetings, this being the second and last.
4. After the hearings officers will present their final recommendations and revised policies.

### **Discussion**

5. Attachment 1 is a list of the second and final tranche of confirmed submitters who have indicated that they wish to speak to the committee.

### **Options**

6. The committee only has one option, which is hearing the oral submitters.

### **Next Actions**

7. Following the hearings, the Strategy and Policy Committee will consider information received on the "Fairer Rents for Council Tenants" consultation and make recommendations to Council in relation to the revised policies.

**Attachments**Attachment 1. Submissions for oral hearings [↓](#) 

Page 10

Author	Cyrus Frear, Senior Democracy Advisor
Authoriser	Jennifer Parker, Democracy Services Manager Stephen McArthur, Chief Strategy and Governance Officer



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## **SUPPORTING INFORMATION**

### **Engagement and Consultation**

This report provides for a key stage of the consultation process – the opportunity for the public to speak to their written submission.

### **Treaty of Waitangi considerations**

N/A

### **Financial implications**

There are no financial implications arising from this report. Submitters may speak to matters that have financial implications.

### **Policy and legislative implications**

There are no policy implications arising from this report. Submitters may speak to matters that have policy implications.

### **Risks / legal**

N/A

### **Climate Change impact and considerations**

N/A

### **Communications Plan**

N/A

### **Health and Safety Impact considered**

In light of the COVID-19 pandemic, the decision was made to postpone the original hearing dates from March 2020. Under the current alert level (level 1 at time of writing) Council and committee meetings will no longer be conducted via audiovisual link. Nevertheless, Democracy Services will facilitate the attendance via audiovisual link for elected members and members of public as an alternative mode of participation.

<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 543e
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Kate Day	Anglican Movement	Organisation	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>No comments entered</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>No comments entered</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>No comments entered</p>			
<p>4. Do you have any comments about our draft Social Housing Policy? (Full document available as appendix) Summary</p> <ul style="list-style-type: none"> <li>• Council should not pass this policy without safeguards to</li> <li>• protect social housing places</li> <li>• Some proposed rent rises are not affordable, or will not stay affordable for long</li> <li>• City Housing should be financed by Income-Related Rent</li> <li>• Subsidies (IRRS) and/or rates</li> <li>• Future consultations need to be more transparent</li> </ul>			

Dear Councilors,

Thank you for your ongoing efforts to provide social housing. By caring for vulnerable people and creating richly diverse neighbourhoods, social housing benefits all residents of Wellington.

I wish to submit that:

- 1) Council should NOT make the proposed changes without putting in place safeguards to prevent, or at least limit, the potential effect of social housing places being 'lost' to tenants who can pay market rents.
- 2) Some of the proposed rents are not affordable, or will not stay affordable for long. If Council does pass this policy, it should reduce the number of tenants required to pay 100% of market rent. It should also stagger any rent rises above \$40 per week so that tenants have time to adjust.
- 3) City Housing should be financed by Income-Related Rent Subsidies (IRRS) and/or rates. Council should make every effort to move in this direction.
- 4) Future consultations need to be more transparent to enable engagement.

*Council should not pass this policy without safeguards to protect social housing places.*

I commend a number of things in this proposal:

- the shift to an income basis for rent setting
- simplifying the system by removing rental caps, and rent freeze for over-80s
- the increase of asset limits to \$99,000
- the intention to improve security of tenure by not automatically asking tenants to leave when their income passes the threshold.

However, raising some tenants' rents creates a serious risk that over time, more and more City Housing fills up with higher-paying tenants, because:

- Longstanding tenants will stay on when their incomes rise
- There is a financial incentive for City Housing to prioritise tenants on higher incomes (or with greater earning potential) when assigning places.

Safeguards are needed to keep City Housing places for poorer Wellingtonians. Please do NOT pass this proposal without introducing safeguards that ensure:

- That City Housing prioritises people at the lowest end of the income scale and/or in greatest need when assigning places
- That there is a limit put on the number of places for high paying tenants, and/or that City Housing replaces homes occupied with high-paying tenants by buying new buildings.

Without such safeguards, vulnerable people will have fewer places to live in Wellington and we will be a less compassionate and diverse city.

*Some proposed rent rises are not affordable, or will not stay affordable for long.*

Wellington rents are rising faster than incomes. I question whether rent rises for better-off tenants are really 'affordable'. If so, they will not stay that way for long.

If Council does pass this policy, it should reduce the number of households required to pay 100% of market rent. It should also stagger any rent rises above \$40 per week so that tenants have time to adjust. This would reduce income that City Housing makes, but it is not fair to put one group of tenants into hardship to allow (small) rent reductions for others.

*City Housing should be financed by Income-Related Rent Subsidies (IRRS) and/or rates.*

The solution for financing City Housing should be seeking Income Related Rent Subsidies and contributing rates. These are the only way to keep rents affordable long-term.

Council should prioritise campaigning to central government for IRRS, and contribute rates to City Housing.

*Future consultations need to be more transparent.*

The information provided for this consultation was not sufficient to assess whether the proposal is 'fairer'. The Let's Talk Wellington website did not provide:

- the criteria determining whose rent would rise or fall
- how new rents would be calculated
- the range of projected rent rises, and decreases, compared to current rents.

Some of this information was public in a paper of the Strategy and Policy Committee, page 29, however it is not reasonable to expect an average submitter to know that.

I do wish to commend Paul Davies, who responded quickly to my requests for further information.

The rent calculator is a good idea, but it is no replacement for showing how rents will change on a systemic level (rather than an individual one). I am also concerned that the calculator is inaccurate. It requires Accommodation Supplement to be included as income, yet AS will change when rent changes.

I suggest that future consultations link to all relevant documents. It would also be worthwhile telling each tenant exactly what their new rent would be under the new proposal, saving them the effort of calculating it.

Thanks for the opportunity to make this submission. I wish to make an oral presentation.

Kind regards,

Kate Day  
Anglican Advocacy

**City Housing Fairer Rents For Tenants Consultation** Submission# 544e

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
John-Luke Day	Urban Vision (Newtown South)	Organisation	Yes

1. We propose to set City Housing tenants' rent based on their income and circumstances.  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)  
 No comments entered

2. Thinking about your response to question one, what are your reasons for your level of support?  
 No comments entered

3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?  
 No comments entered

4. Do you have any comments about our draft Social Housing Policy?  
 (Full document available as appendix)  
 Our submission covers 5 main points:  
 1. We have concerns about the consultation process and the ability of City Housing tenants to meaningfully engage.  
 2. There are several aspects to this proposed changes we agree with.  
 3. The proposed changes are likely to lead to unaffordable rents.  
 4. It appears that the proposed changes will mean a significant proportion of City Housing units will be occupied by moderate income-earners who will be charged full market rent.  
 We are concerned City Housing is moving away from social housing and not prioritising the needs of low income-earners with greater housing needs.  
 5. The Council should reconsider its policy of deriving City Housing income solely from its rental stream. The Council should seek access to Income Related Rent Subsidies (IRRS) from Central Government and/or apply rate income.

# Wellington City Council Review of City Housing Rent Policy

Submission of Urban Vision Newtown South Team

## Introduction

Urban Vision is a Christian movement. Its members are passionate about following Jesus, loving each other and loving our neighbours.

Members of Newtown South Team of Urban Vision have lived in or adjacent to the Newtown Park Apartments since 2006. Between the years 2012 to 2017, team members lived in a unit within the complex. Over the years we have built close relationships with our neighbours in the Apartments through activities such as running an after-school kids club; running a playgroup; running a sewing club; hosting community dinners; providing English lessons; organising outings and celebrations. We have unique insights into the lives and issues of City Housing tenants.

Our submission covers 5 main points:

1. We have concerns about the consultation process and the ability of City Housing tenants to meaningfully engage.
2. There are several aspects to this proposed changes we agree with.
3. The proposed changes are likely to lead to unaffordable rents.
4. It appears that the proposed changes will mean a significant proportion of City Housing units will be occupied by moderate income-earners who will be charged full market rent. We are concerned City Housing is moving away from social housing and not prioritising the needs of low income-earners with greater housing needs.
5. The Council should reconsider its policy of deriving City Housing income solely from its rental stream. The Council should seek access to Income Related Rent Subsidies (IRRS) from Central Government and/or apply rate income.

**We would like to make an oral submission to Councillors.**

## Concerns with the Consultation Process

The Council's consultation has not enabled City Housing tenants to understand the proposed changes and to meaningfully engage in the process.

The proposed changes are complex. The Council's consultation documents simplify the changes at a high level. However, many City Housing tenants do not have English as their first language. We have discussed the changes with several tenants and attended tenants meetings with Council officials. It has been clear to us that many tenants do not understand what is proposed.

Even for those who can understand the Council documents, it is impossible to determine what the changes will mean for individual tenants. The rent calculator on the [letstalk.wellington.govt.nz](http://letstalk.wellington.govt.nz) website is not helpful. The calculator estimates tenants' new rent, but the change in rent will affect tenants' eligibility for the Accommodation Supplement - either positively or negatively. The calculator does not therefore give a clear picture of tenants' new **net financial position**. Further, we presume the calculator is based on the current median market rent. When the changes are implemented, and certainly for future years, the market rent is likely to have increased significantly.

The Council's consultation materials are headed "*fairer rents for tenants*", which begs the question of the consultation process. Given that tenants cannot determine the financial implications of the proposed changes, it would seem misleading to label the changes as "fair". We are concerned that many tenants will simply accept the description of "fair" and not scrutinise whether in fact the changes are in their interests.

## Aspects of the proposed changes we commend

We commend several aspects of the proposed changes:

- the shift to an income basis for rent setting;
- simplifying the system by removing rental caps and rent freezes for over-80s;
- the increase of assets limits to \$99,000;
- the intention to improve security of tenure by not automatically asking tenants to leave when their income passes the threshold.

## Unaffordability

Noting that it is impossible for tenants to determine what the proposed changes mean for their financial position in net terms, we are concerned the new rents will quickly become unaffordable.

The proposed new rent is pegged against the median market rent. Under the new Policy there will be no cap on rental increases.

Over recent years, rises in rents have significantly outstripped rises in incomes. It is highly likely the rents City Housing tenants will be required to pay will quickly become unaffordable as market rent rises.

## Move away from social housing

We are concerned that the proposed changes will see a significant and growing proportion of City Housing units used to house tenants on reasonable incomes. These tenants will then pay 100% of market rent, or an amount very close to it. We are concerned these changes represent a move away from social housing. The move will be to the detriment of low income earners who need City Housing the most.

The proposed new Policy classifies each household using three income thresholds relative to the median income for the Wellington region:

- a. Very Low Income - those who earn up to 50% of the median income;
- b. Low Income - those who earn up to 80% of the median income;
- c. Moderate Income - those who earn up to 120% of the median income.

The *Social Housing Policy* documents dated 12 March 2020 and presented to the Council's Strategy and Policy Committee contain tables that ascribe dollar figures to the different income thresholds for different household types (at page 37). We have replicated this information in the following table and included:

- a. the weekly income thresholds currently used by City Housing to determine eligibility; and
- b. the proportion of market rent tenants would pay under the proposed policy:



Household type	Very Low Income	Low Income	Moderate Income	Current City Housing eligibility thresholds
Single	\$452 p/w	\$724 p/w	\$1,086 p/w	\$889 p/w
Couple or 2 adults	\$875 p/w	\$1,400 p/w	\$2,100 p/w	\$946 p/w
Single with children	\$992 p/w	\$1,587 p/w	\$2,380 p/w	\$1,088 - \$1,788 (depending on number of children)
Couple with children	\$992 p/w	\$1,587 p/w	\$2,380 p/w	\$1,145 - \$1,845 (depending on number of children)
<b>Proposed proportion of market rent payable under new policy:</b>	60-75%	76-99%	100%	

(all income is net of tax)

As the table shows, the current eligibility thresholds generally fall under what would be classed as Low Income under the new policy. The Moderate Income group would in some instances include those on incomes that are more than double the current eligibility thresholds.

In short, the new Policy looks to include those on significantly higher incomes than the current eligibility thresholds allow for.

At a meeting with Newtown Park Apartments residents, Council officials presented some modelling based on a sample of 1,329 current City Housing tenancies. Based on this modelling, under the proposed changes 116 existing tenancies (9%) would pay 100% of market rent as they are currently in the Moderate Income threshold. A further 303 (23%) would pay between 71-99% of market rent because they are already in the Low Income threshold.

City Housing has been clear that it is relying on charging increased rents to the Moderate and Low Income tenants to generate an additional \$1.5 million in revenue for City Housing upgrades.

It seems to us that City Housing is moving away from a commitment to provide social housing to lower income earners. Instead, it is proposing to rely on renting City Housing stock to those on

reasonable incomes who City Housing will then charge 100% of market rent, or an amount close to it. City Housing's model appears to rely on having enough tenants in the higher income thresholds in order to generate the revenue it requires.

We are concerned this approach will limit the availability of social housing to those who need it most. It arguably undermines the intent of social housing which, by the proposed new Policy's own terms, is to give priority to those Wellingtonians "most in need".

We also question whether this proposed new approach is consistent with the Council's obligations under the Deed of Grant with the Crown regarding City Housing. According to the documents presented to the Strategy and Policy Committee dated 12 March 2020 officials have advised:

"Under the Deed, the Council is required to **remain in social housing until 2037 and to maintain ownership of the portfolio at similar numbers**. Any change would require renegotiation of the Deed."

(emphasis added)

We strongly recommend that the proposed Policy be amended to include safeguards to ensure City Housing continues to provide social housing to those low income earners with housing needs. Those safeguards should include:

- express restrictions in eligibility criteria that applicants in the Moderate Income bracket are not eligible for City Housing, and those in the Low Income bracket are only eligible in exceptional circumstances when clear housing need is shown;
- provision that, if the new Policy is to allow for tenants in the Moderate Income and Low Income brackets, they must be existing tenants whose income has increased from the time they initially met the eligibility criteria (noting that existing tenants should enjoy reasonable security of tenure);
- goals to limit the proportion of City Housing units rented to tenants in the Moderate Income bracket. We suggest a limit of no more than 10%.

## Sourcing external income

It is not clear to us why Council has taken the position that City Housing must sustain itself solely from the rental income it generates from tenants.

While we realise IRRS funding is not available to local authorities, the Council documents dated 12 March 2020 presented to the Strategy and Policy Committee note that some councils have created alternative structures (community trusts, joint ventures and sale of housing) to enable tenants to access IRRS. It is not clear why City Housing has not chosen to go down this route. Although shifting City Housing to an alternative structure may not be contemplated under the

Deed of Grant, the terms of the Deed have been renegotiated in the past (such as in the case of the Arlington Apartments redevelopment with Kainga Ora involvement).

It is also not clear why Council has chosen not to apply rate income to City Housing. The Council documents dismiss this option saying there are issues of "equity and affordability". However, housing stress and homelessness for the most vulnerable is a problem affecting all Wellingtonians. It is in all rate-payers' interests to see that low income earners in housing need are properly accommodated.

We strongly recommend that Council consider the alternative options presented in the documents dated 12 March 2020 to seek IRRS funding and/or apply rate income.

<b>City Housing Fairer Rents For Tenants Consultation</b>	Submission# 546e
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Name	ON BEHALF OF:	ARE YOU	ORAL SUBMISSION:
Warwick Taylor	Wellington Housing Action Coalition	Organisation	Yes

**1. We propose to set City Housing tenants' rent based on their income and circumstances.  
How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)**

No comments entered

**2. Thinking about your response to question one, what are your reasons for your level of support?**

No comments entered

**3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?**

No comments entered

**4. Do you have any comments about our draft Social Housing Policy?**

(Full document available as appendix)  
The Wellington Housing Action Coalition believes that:

- rent should be set as a percentage of household income;
- the income should be the basic income received by the household;
- tenants should not be evicted due to a change in circumstances; and
- vacant housing should be allocated on the basis of greatest need and suitability.

There are aspects of the proposal that we support. They are:

- security of tenure; and
- the increase in the asset limit.

## **Submission of the Wellington Housing Action Coalition on the Wellington City Council Proposal for Fairer Rents**

### **1. Introduction**

The Wellington Housing Action Coalition was formed to:

- Stop State House sales
- Stop evictions
- Make housing an election issue
- Improve quality of housing and introduce warrant of fitness
- Assist access to legal rights for tenants
- Promote the building more Council and State housing

The Coalition also supports income-related rents for Council and State housing tenants. We are affiliated to the State Housing Action Network.

### **2. Our Position**

The Wellington Housing Action Coalition believes that:

- rent should be set as a percentage of household income;
- the income should be the basic income received by the household;
- tenants should not be evicted due to a change in circumstances; and
- vacant housing should be allocated on the basis of greatest need and suitability.

The Wellington Housing Action Coalition supports a move to income-related rents.

We note that the proposed method of calculating rent is not purely income-related but based on market value with a discount dependent on the household income band. We do not support this means of determining rent.

The Coalition asks that the Council change its policy so that the rent is set as percentage of household income.

Given our lack of information about the cash flow of the City Council's housing operations and the incomes of tenants, we cannot state what percentage of household income would allow the City Council housing operations to break even but 25% of household income seems reasonable.

Some of our people have discovered that the income used in the proposed basis for setting rent includes the Accommodation Supplement. The income should be the income received by the tenant household, and not include subsidies such as Accommodation Supplement, which is calculated after the rent is set, Disability Allowance or Winter Energy Payment.

### 3. Other Aspects

There are aspects of the proposal that we support. They are:

- security of tenure; and
- the increase in the asset limit.

#### 3.1 Security of Tenure

We support security of tenure so therefore applaud the proposed change so that tenants will not automatically be evicted after 12 months if their income improves. However, the allocation of vacant flats to tenants must be on the basis of most need and suitability of accommodation.

**City Housing Fairer Rents For Tenants Consultation** Submission# 527

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Jacky Fuller	As an individual	A Council tenant	Yes

**1. We propose to set City Housing tenants' rent based on their income and circumstances.  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)**  
 5 Definitely Disagree

**2. Thinking about your response to question one, what are your reasons for your level of support?**  
 I am a superannuitant on a low fixed income. Currently I pay 46% of my income in rent, under this policy I would be paying 52% of my income in rent.

**3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?**  
 The proposed policy contravenes the WCC's own principles on Security of tenure, rents that are equitable, sustainable and affordable, the right to age in place.

**4. Do you have any comments about our draft Social Housing Policy?**  
 I am 72 years of age and have no other income but Superannuation. I have had an Accommodation Supplement for just under a year, prior to that I kept readjusting my budget as the rent rose more than the cost of living increases.  
 But following last year's rent increase, after allocating the usual amounts to my budget, I was left with \$15 for a fortnight's discretionary spending, so I applied again and this time was granted an Accommodation Supplement of \$194 per fortnight. When I got the Accommodation Supplement, I relaxed about the rent for the first time in 5 years. I am again sleeping poorly because I am worrying about the rent, losing my home and being forced to move: it is the last thing on my mind at night and the first thing on my mind in the morning. I have lived in Berkeley Dallard for nearly 6 years, I have made my life here, I have friends here, I am happy here, I feel safe, and I thought my accommodation was secure for life. By deeming the Accommodation Supplement to be income the WCC have effectively removed it from me which puts me back to where I was last year. How can this be fairer?  
 People in my situation are paying 46% of their income in rent under the old system, we will be paying 52% of our income under the new system. By including the Accommodation Supplement as income, we have been categorised as being above 50% of the median, when in fact our actual income the Superannuation is below that (see WCC income bands).  
 At a minimum my rent will go up by \$27.60 a week (using the WCC calculator),

\$55.20 per pay, and that is almost the exact amount that I currently have left after the budget allocations have been made.

That margin is, for me and all those in the same position, the difference between being able to afford perhaps three unsubsidised health services once a year or only one. A trip to the podiatrist is \$97, the dentist a minimum of \$95. It is also the money for buying clothes, shoes, gifts, entertainment, technology and so on. In order to have any spending money under the new system I will have to choose between reducing my food budget or my health budget.

On the face of it, it looks like a continuous loop: the assessment is done using the Accommodation Supplement as income, the rent goes up: the Accommodation Supplement is increased, the income stabilises; the rent is then assessed against this increased income which includes the Accommodation Supplement, so the rent goes up.

The Accommodation Supplement is currently capped at \$105 so once that cap is reached and the rent goes up beyond the tenant's ability to pay what happens? It is just a slow process of eviction, eviction by stealth if you will. WINZ does not count the Accommodation Supplement as income so why does the WCC?

Please tell me that I have misunderstood the new system and that I am not going to be squeezed out of my home by it.



**City Housing Fairer Rents For Tenants Consultation** Submission# 528

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
John Heighes	As an individual	A Council tenant	Yes

**1. We propose to set City Housing tenants' rent based on their income and circumstances.**  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)  
 No comments entered

**2. Thinking about your response to question one, what are your reasons for your level of support?**  
 No comments entered

**3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?**  
 No comments entered

**4. Do you have any comments about our draft Social Housing Policy?**  
 The assertion is that about 50% of City Housing tenants will see a reduction in the rent they pay, however the ensuing shortfall in rental income will be taken up by a significant increase in rent for many other tenants.

As a super-annuitant I would accept a small rent rise to enable the rent of others less fortunate to drop, however, that is not the case. What is being publicised as a 'Robin Hood' move is actually , in the words of counsellor Diane Calvert, 'robbing Peter to pay Paul' and more resembles a move to equally distribute poverty.

Single superannuitants, who represent 10% of City Housing tenants – approximately 300 people - receive , including the max Accommodation Allowance of \$105, \$528 pw., therefore are part of the middle band by virtue of being \$29 pw over the band threshold. According to the online calculator, many face a significant rent rise, in some cases of between \$30-\$50 pw, which represents between 50%-60% of their income.

The UN recommendations for affordable rent are 25%-\$30% of income, so the proposal aims to set rates at double the percentage set out in the UN's 2010 International Covenant on Economic, Social and Cultural Rights.

In addition, the draft proposes to stop the current Rent Freeze for over 80 year olds, apparently in order to practise 'equality'. Counsellors need to be informed as to the

crucial difference between equality and equity:

"Equality is when everyone is treated in the same way, without giving any effect to their need and requirements. The central idea of equality is that all the individuals gets equal treatment in the society and are not discriminated on the basis of race, sex, caste, creed, nationality, disability, age, religion and so forth.

Equity can be defined as the quality of treating individuals fairly based on their needs and requirements. Equity ensures that all the individuals are provided the resources they need to have access to the same opportunities."

Stopping the Rent Freeze for over 80 year olds will expose these vulnerable citizens to the annual rent increases calculated from the annual review of 'market rents'. Once the Accommodation Allowance's \$105 cap is reach then over 80 year olds will see their disposal income gradually diminish year to year ensuring a slide into poverty and removing all 'security of tenure'. These are not 'upwardly mobile' tenants, and for many their council flat will be their last stop.

Low income earners, usually holding down part time jobs in the 'gig' economy, already struggle week to week. This move will make their bad weeks worse, quite apart from the challenge of how to fairly calculate a weekly income with wildly fluctuating pay cheques. Averaged out over a year it will mean that some weeks they eat, some weeks maybe not.

In addition, low income tenants, such as my refugee neighbours for example, are just starting to stabilise financially after experiencing a two year economically precarious roller coaster ride. Now that they finally have a very small disposable income, they will see that disappear in a rent rise.

In some cases the use of income 'bands' will see a pay rise mean a drop in disposable income, for instance when a beneficiary turns 65. The superannuation, higher than the benefit, will place them in a higher income band and take away a lot of their pay rise. The same would occur for a part time worker who was offered a full time position. In such cases the proposed policy could actually operate as a disincentive for working tenants to attempt to get ahead financially.

The income bands also fail to take into account tenants' individual circumstances such as a ongoing medical expenses, care of relatives - often overseas in the case of immigrants, tuition fees, legal expenses, car payments, student loan payments etc.

The fixing of rent against 'market rates', eventually forces every low income earner into poverty. A 'fair' and socially responsible policy would aim to shelter the most vulnerable and financially precarious citizens from the ever ongoing effects of 'market forces'. A policy that offered these citizens some form of rental stability would contribute greatly to enabling them to gain a sense of security and social

inclusion.

Overall this appears to be a hastily developed draft policy with many aspects inadequately thought through. I am sure City Housing does not intend to contravene its own mission statement, however, the results of this policy being implemented would do just that. In essence it would help to further ensnare a growing underclass, fearful of the next annual rent review, in ongoing financial precarity and insecurity.

The three main requests I would like to make are:

- if 'income bands' are to be applied, then the parameters of the 'Very Low' income band be adjusted so that superannuitants fall within this band and will therefore not experience exorbitant rental increases.
- that the 'Rent Freeze' for over 80 year olds remain in place.
- that the current 'Rent Caps' that limit the amount rents increase by remain in place.

City Housing Fairer Rents For Tenants Consultation			Submission# 531
Name	ON BEHALF OF:	ARE YOU	ORAL SUBMISSION:
Selwyn Warren	As an individual	A Council tenant	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>4 Somewhat Disagree</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>Having looked at the website and calculating my future rent using your calculator, I have some observations.</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>I think you need to be up front with people about what you are hoping to achieve here, your brochure make it all sound rosey, but there is a hidden agenda here.</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?</p> <p>No comments entered</p>			

**City Housing Fairer Rents For Tenants Consultation** Submission# 502

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Nancy Nichols-Acevedo	As an individual	A Council tenant	Yes

1. We propose to set City Housing tenants' rent based on their income and circumstances.  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)  
 5 Definitely Disagree

2. Thinking about your response to question one, what are your reasons for your level of support?  
 On the surface, this proposal misrepresents the WCC agenda as fairer rents for social housing tenants. However, this proposal actually represents an erosion of the WCC commitment as a premier social housing provider in NZ and conflates it with All Wellingtonians well housed. It expands the eligibility demographic to those struggling in the overheated private rental market who will pay full market rent and charge up the City Housing coffers. While the Independent Housing review from several years ago, charged the WCC to review operational costs, (including high cost City Care maintenance contracts), they have instead eroded the social values of social housing retrenching the community action services and the client facing services by reducing the number of tenancy advisors.

3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?  
 Again, in the surface, the statement appears laudable. Overall, this communication is misleading and may in fact constitute a human rights violation.

4. Do you have any comments about our draft Social Housing Policy?  
 This is a could actually be a very lean and mean policy document.  
 Council's commitment to Social Housing and the general view that the Wellington Council is strongly committed to social justice is at risk when this policy is operationalised. The target groups identification is absent, as are specific income and asset levels. The three-tiered income band indicators are opaque. These do not guarantee affordable rent for the most vulnerable Wellingtonians.  
 Pensioners are at risk of being pushed into poverty and homelessness as their housing becomes unaffordable, and the accommodation supplement (incl as in income evaluations for this exercise) tops out in the first year of this policy.

Big questions -

1. to make room for the more affluent demographic - is Council intentionally squeezing out fixed income pensioners driving them into unmanageable poverty.
2. Who is prepared to provide service to these new homeless Wellingtonians segment of the extremes of the rental market continuum? Does Council intend that this will fall back on the Crown?

Council has a budget incentive to tenant the units vacated by this 25% of residents with those from the high value demographic, who are upwardly mobile and on a first home owner track. In its Finance Strategy decisions on who pays for a service, WCC feels that tenants benefit 100% from this service. Therefore rental income is ring fenced and the critical dependency for City Housing operations. If tenants are the 100% stakeholders, what accountability does the Council have to them for this service operation? As one of the WCC's largest operational incomes (at ~\$25m per annum) and expenditures (at ~17m plus ~\$12m depreciation funding) what transparency do these stakeholders have or does the Council provide on probity in this area to both the ratepayers and the Crown?

<b>City Housing Fairer Rents For Tenants Consultation</b>			<b>Submission# 530</b>
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Kokas Narjam	As an individual	A Council tenant	Yes
<p><b>1. We propose to set City Housing tenants' rent based on their income and circumstances.</b>                      How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p>			
1 Definitely Agree			
<p><b>2. Thinking about your response to question one, what are your reasons for your level of support?</b></p>			
I am very old man and sick diabetes, blood suger high, very slow and hard walking now. Bad pain back, only work and income payment not having other support and paying money for medical and doctor, food.			
<p><b>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</b></p>			
Very high			
<p><b>4. Do you have any comments about our draft Social Housing Policy?</b></p>			
No			

**City Housing Fairer Rents For Tenants Consultation** Submission# 541e

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Alex Johnston	As an individual	Member of public	Yes

1. We propose to set City Housing tenants' rent based on their income and circumstances.  
How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)  
No comments entered

2. Thinking about your response to question one, what are your reasons for your level of support?  
No comments entered

3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?  
No comments entered

4. Do you have any comments about our draft Social Housing Policy?  
(Full document available as appendix)  
Key recommendation  
My key submission is that in the absence of significant safeguards identified below and a broader effort by Council to renegotiate the position of Council housing in regards to IRRS or access to rates to fund the necessary renewal works, these proposed changes should not go ahead.  
I also fully support the recommendations made in the Newtown South Urban Vision Team's submission. In addition to the submission made by the Newtown South Urban Vision Team, I raise the following points:

- Needs assessment and who Council housing is catering for
- Generating revenue from tenants: 'fairer rents'?



**Submission of Alex Johnston to Wellington City Council's 'Fairer Rents for Council tenants' consultation**

Alex Johnston

**Introduction**

I am making this submission as an individual.

I am a member of the public, who lives across the road from the Newtown Park Council housing apartments, with other members of the Urban Vision team that has a long standing relationship with Council tenants in Newtown Park and the wider Newtown area.

I would like to make an oral submission to Councillors.

**The role of Council Housing**

I am making this submission as a Wellingtonian who cares deeply about our city providing for those most in need in our communities, so that we can all have stable, connected homes in which to lead full, supported lives in the community.

All Wellingtonians benefit from our council housing providing for a diverse range of housing needs that might otherwise be priced out of the market or unable to find adequate housing and social support systems. Lockdown has shown how much we rely on each other - from our supermarket workers, to our taxi drivers, we all play a part in keeping our communities connected and thriving.

That makes the potential impacts of these proposed changes very significant.

**Key recommendation**

My key submission is that in the absence of significant safeguards identified below and a broader effort by Council to renegotiate the position of Council housing in regards to IRRS or access to rates to fund the necessary renewal works, these proposed changes should not go ahead.

I also fully support the recommendations made in the Newtown South Urban Vision Team's submission. In addition to the submission made by the Newtown South Urban Vision Team, I raise the following points:

**Needs assessment and who Council housing is catering for**

The proposed Prioritisation and Needs Assessment Policy, found on page 67-68 of the documents presented to the Strategy and Policy Committee dated 12 March 2020, leaves significant ambiguity in what level of financial need applicants to Council Housing would normally have to qualify for council housing.

The proposed policy identifies that an individual needs assessment takes place, from which a rating is found that determines their priority on the waiting list. Nowhere in the proposed list of factors considered in the needs assessment is applicants' financial circumstances or income mentioned. Though this may be implied from other words, financial circumstances is not one of the clear criteria. Likewise, in the types of groups identified as appropriate for city housing, there is no mention of those on very low incomes being identified as an 'appropriate' group for council housing.

Clearly, many tenants that meet the other groups listed will be those in financial need due to intersecting issues that affect their income, and this should not be the only determinant of housing vulnerability. But for publicly owned Council housing to be serving its purpose, one would think financial circumstances and the inability to afford what the market is providing would be an important criteria!

This vagueness in financial circumstances, combined with the significantly increased thresholds for eligibility in the broader *Social Housing Policy* (see appendix 1) and intent to charge some tenants 100% of market rent, suggests that council housing will not be serving its role to provide for those most in need, but rather opening itself up to a moderate income band more permanently.

I therefore strongly recommend that:

- the Prioritisation and Needs Assessment Policy explicitly includes financial need and inability to afford the private market as one of the factors weighed in the needs assessment to determine prioritisation.

In addition, I copy and support the recommendations from Newtown South Urban Vision's submission, that the proposed Policy be amended to include:

- express restrictions in eligibility criteria that applicants in the Moderate Income bracket are not eligible for City Housing, and those in the Low Income bracket are only eligible in exceptional circumstances when clear housing need is shown;
- provision that, if the new Policy is to allow for tenants in the Moderate Income and Low Income brackets, they must be existing tenants whose income has increased from the time they initially met the eligibility criteria (noting that existing tenants should enjoy reasonable security of tenure);
- goals to limit the proportion of City Housing units rented to tenants in the Moderate Income bracket. We suggest a limit of no more than 10%.

**Generating revenue from tenants: 'fairer rents'?**

Despite this being labelled as 'fairer rents' for tenants, the proposed Social Housing Policy looks set to generate \$1.5 million in revenue per year, in order to pay for maintenance and remediation works. This was not mentioned in the 7 page consultation document, but rather was buried on page 42 of the documents presented to the Strategy and Policy Committee dated 12 March 2020.

The policy intent of the new rent setting policy includes to generate sufficient rental income to not just provide ongoing management and maintenance, but to pay for "future planned improvements on City Housing properties" (page 9 of City Housing Social Policy Documents). This shows an intent to continue to generate revenue from tenants to pay for redevelopments, rather than drawing from other sources such as rates, debt, or seeking government investment.

It is my submission that Council should not be charging higher rents than needed to cover basic costs to Council tenants - the costs of remediation should be socialised with the wider Wellington public, not put on council tenants, who are already identified as those most in need. The arbitrary position that 'Council housing should pay for itself' is unfair and not how social housing should be funded - the revenue generation goal also goes against the publicly stated purpose of creating 'fairer rents for Council tenants'.

It is my strong recommendation that:

- The proposed rent changes should be revenue neutral, not generate \$1.5 million in profit from Council tenants
- The intent to develop rents that generate enough money to "carry out future planned improvements to Council Housing properties" be removed from the rent setting policy
- That Council instead look to fund these improvements from rates or debt in the short term, and in the long term seek renegotiation of the Deed with central government and access to the IRRS so that sufficient funds for remediation can be found.

**Appendix 1**

Household type	Very Low Income	Low Income	Moderate Income	Current City Housing eligibility thresholds
Single	\$452 p/w	\$724 p/w	\$1,086 p/w	\$889 p/w
Couple or 2 adults	\$875 p/w	\$1,400 p/w	\$2,100 p/w	\$946 p/w

Single with children	\$992 p/w	\$1,587 p/w	\$2,380 p/w	\$1,088 - \$1,788 (depending on number of children)
Couple with children	\$992 p/w	\$1,587 p/w	\$2,380 p/w	\$1,145 - \$1,845 (depending on number of children)
<b>Proposed proportion of market rent payable under new policy:</b>	60-75%	76-99%	100%	

(all income is net of tax)

**City Housing Fairer Rents For Tenants Consultation** Submission# 533

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Bruce Hamill	Organisation (Island Bay Presbyterian Church)	Individual	Yes

**1. We propose to set City Housing tenants' rent based on their income and circumstances.**  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)  
 No comments entered

**2. Thinking about your response to question one, what are your reasons for your level of support?**  
 No comments entered

**3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?**  
 No comments entered

**4. Do you have any comments about our draft Social Housing Policy?**  
 Submission on WCC Consultation on Fairer Rents for Council Tenants  
 I make this submission to OPPOSE the new Rent Setting Proposal as it stands. I understand and respect the stated purpose of the proposal – to make the rents 'fairer'. However, I have serious doubts as to whether this policy will achieve the stated end. I am also conscious of the need by City Housing to make more money from its housing stock.  
 The only way I could support this proposal would be if I saw substantive changes to the shape of the proposal. I will outline my concerns and the changes I think necessary to have confidence that it indeed represents a step towards greater fairness and a greater commitment to the urgent need for social housing in Wellington.  
 Process  
 I work every day in community development and social support for social housing tenants. Although I am not a tenant myself, I know the communities of Rintoul Flats and Granville Flats (Berhampore) very well. I am witness to the high level of confusion among tenants about what is going on. On Wednesday 24th, about a week before the end of consultation, City Housing came out to explain the proposal to tenants. Although they did a fine job in the circumstances there were questions that they were unable to answer. Moreover, there was a strong sense that the whole proposal has arisen very suddenly and there is very little time to get our heads around it and

understand the implications of it. Many tenants have very little English. Even those that did were struggling with the complexity of it and the difficulty of working out whether it was fair. Those most likely to be adversely affected, those who work during the day, were, of course not present. We suspected that Covid19 had put time pressure on the democratic process. I believe that public participation in decisions like this (especially of those most effected) deserves a longer time period and fuller information on which to base their response. The content in written material sent to tenants was very thin on detail.

To address the poor consultation I believe it essential that this process be extended in time and that the online calculator remain available to tenants use beyond the cut off date of 30th June. I will say more about the kind of information that needs to be available for good consultation in the next paragraph.

#### Assessing Fairness

The appeal to fairness makes intuitive sense. Those on the lowest income will have a (small!) decrease in rent. Those who earn more will pay more. However, everything depends on the detail – how much more, how much less?

On the ground in the flats there is a sense of injustice around the fact that tenants who live along the road in HNZ flats are not only paying much cheaper rents, but, even when all income is taken into account (esp Accomodation Supplement), are still ending up with significantly less to live on. This situation looks to be improved slightly for those on the lowest income in the current proposal. However, this situation is significantly worsened for City Housing Tenants who are working on low wages. There looks to be quite large rises in rental costs for this group in the new proposal, and Wellington certainly needs this group of people.

The material, both written and online, asks for feedback on whether the new system is fair and affordable. It is possible for an individual tenant to assess whether the change will be affordable for them. However, the calculator does not enable them to draw comparisons across the board to see how it effects others (and thus might or might not be 'fair'). When I asked about the measure of fairness and the 'basket-of-goods' criterion I was unable to get enough detail to assess it for fairness, so tenants were certainly unable to do this same research. On the new model (WHAM) the affordability of rent depends on enough money left to afford a 'basket' of essential expenses. It is understandable that this is a complex model. And I think it is probably a good thing that it is. Different households have different needs. However, the fact remains if we are to be able to give adequate feedback on the fairness and affordability we need to know what list of goods (for each category of household) City Housing have used to establish their rent-calculator and what price they have put on that list of goods. Without such information we are largely in the dark about the fairness of it. It is not enough to hide behind technicalities and expert opinion here.

To address the opacity surrounding fairness, the proposal needs to offer much more detail about the basis on which rents are calculated. Tenants need to be able to assess if what City Housing believes is necessary is indeed all that is necessary for a

dignified life and if they have put a fair price on those things. The WHAM model cannot be offered at the level of broad generalisation. It needs to be transparently present for public consideration.

Who will City Housing be housing?

City Housing has a limited stock of housing and a waiting list of over 300 people (last I heard) who qualify under the current levels of income eligibility. The new model appears to offer housing to a whole new group of people at a 'moderate income' whose income is between 80% and 120% of the median Wellington income. This latter group would not qualify to get accommodation under current policy. I realise that some tenants have stayed on in social housing flats after their income rose above eligibility levels and that this is, on occasion, helpful. However, if this change is true and City Housing is now extending their work in this way then they are no longer strictly 'social housing' or at the very least they are decreasing their truly 'social housing' portfolio by loosening the way they distribute it. In short it will mean that there will be less accommodation for those who need it most. This may well help City Housing's coffers but it is not the direction I believe City Housing should be moving. What's more this is a direction which is not signalled and is hidden in the detail of the new changes. At the very least a change of direction like this should be highlighted and the reasons given for all to consider.

The 10-year-plan adopted by WCC in 2018 said the Council was seeking Wellingtonians opinions on whether to "increase its involvement in the availability and provision of housing, beyond the social housing service it currently provides, to better support the availability of affordable housing across the city." On this matter they promised to consult the public and offer plans as they arise. This looks very much like a move away from social housing to housing affordable to a higher income bracket. However, this aspect of the move has not been consulted on or even properly signalled.

To address this change a cap must be put on eligibility for housing. City Housing must be retained for those with incomes at least below 70% or 80% of the median Wellington median income.

Wider Political Issues and working with Central Government to provide a consistent Income Related Rent Subsidy

There seems to be two things that tenants of City Housing and City Housing employees who work with tenants on the ground agree on. Firstly, it is that City Housing tenants need IRRS and would be better off with it. And secondly, that the NZ govt and City Housing need to work together and agree to a scheme which makes that happen. We have heard many reasons why this has not happened in the past, however, nothing convinces us/me that it cannot happen if there is the political will.

There is no reason why a city that values the well-being of all its citizens, especially children born in poverty, cannot choose to support social housing from rates. This is a good thing for the whole city. At the very least it should be on the table in

discussion between City Housing and WCC. This is a political choice that Councillors can make.

Admittedly WCC has nowhere near as deep pockets as the NZ Government. This is all the more reason for the question of IRRS to be back on the table. We have a housing crisis, which is easily forgotten in the shadow of Coronavirus. However the Coronavirus crisis has taught us that we have not forgotten the call to social solidarity with our most vulnerable citizens. It is time to move forward on this. The current proposal will hide the bigger issue and therefore I oppose the proposal in favour of a review of the relationship between City Housing and the NZ Government in relation to IRRS.



<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 251
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Maryam Koulivand	As an individual	A Council tenant	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances.                      How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>1 Definitely Agree</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>It's not fair for someone with a high income to pay as much as someone with a low income</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>No comments entered</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?</p> <p>No comments entered</p>			

<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 327
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Bilal Kak	As an individual	A Council tenant	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>1 Definitely Agree</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>because I struggle to pay the rent</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>Kindly consider my proposal to reduce the rent. Thank you</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?</p> <p>No comments entered</p>			

<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 90
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Ian Thomas	As an individual	A Council tenant	Yes
<p><b>1. We propose to set City Housing tenants' rent based on their income and circumstances.</b>                      How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>1 Definitely Agree</p>			
<p><b>2. Thinking about your response to question one, what are your reasons for your level of support?</b></p> <p>You are good landlords but based on income my rent is tough every week \$340 income per week. Rent \$200, power \$45 per week, phone and funeral insurance \$30 per week. Not much left to eat and live on And doctors bills \$5 pw</p>			
<p><b>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</b></p> <p>If my rent was more affordable my standard of life would be much better I am alive but not able to do anything but stay home almost waiting to die</p>			
<p><b>4. Do you have any comments about our draft Social Housing Policy?</b></p> <p>No comments entered</p>			

City Housing Fairer Rents For Tenants Consultation			Submission#
			545e
Name	ON BEHALF OF:	ARE YOU	ORAL SUBMISSION:
Chrissy & David Cook	St Thomas Anglican Church (Newtown)	Organisation	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>No comments entered</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>No comments entered</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>No comments entered</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?</p> <p>We live directly across the road from the Newtown Park Apartments and have many friends who are City Housing tenants. Our views are based on our reading of the proposal and multiple conversations with tenants.</p> <p>We oppose the current proposal for the following reasons:</p> <p>Shifting away from social housing priorities The identification of a 'moderate income' band (at 80-120% of the Wellington median income) is an indicator that City Housing has targeted a sector who will increase revenue. There is no mechanism in this policy for limiting the growth of this 'moderate' group. This signals a gradual shift away from social housing priorities. Our city needs to cater to low-income tenants. The proposal has been labelled 'fairer', but it has failed to signal this change.</p> <p>Unfair consultation process The consultation process has been difficult for tenants to engage with. Many of our neighbours in city housing have English as a second language. And therefore both the written and the oral methods created and presented by WCC made it difficult, if not impossible, for many of our friends to understand. We know that WCC has attempted to communicate with tenants via text, emails and posters stating the times of meetings, however in the light of these challenges we</p>			

believe that each tenant should have had access to a translator and/or and independent person that our friends feel safe with.  
This is an extremely complex and detailed plan that is challenging even for people with English as a first language.

**City Housing Fairer Rents For Tenants Consultation** Submission# 324

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Waitai Rakete	As an individual	A Council tenant	Yes

1. We propose to set City Housing tenants' rent based on their income and circumstances.  
How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)  
5 Definitely Disagree

2. Thinking about your response to question one, what are your reasons for your level of support?  
I am very dubious whether all the circumstances will be taken into account. For instance the rent calculator on the WCC page doesn't even take the number of children into account ! And our family has zero (\$0) cash assets. We should be able to save weekly.

3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?  
It is obvious just an excuse to make more money. A WCC housign clients, we are already means tested! If the WCC intends to increase it's revenue and some people's rent will drop, then other people will have to pay a lot more.

4. Do you have any comments about our draft Social Housing Policy?  
People on low incomes can already qualify for the affordable rent subsidy. We only receive \$14 more than the 35% of rent from income. And yet you are proposing to increase our rent by \$70-80 dollars each week. Our family has \$0 zero cash assets. We should have a little more able to be saved so that we can start saving towards having cash assets. The number of children a family has should be taken into account

**City Housing Fairer Rents For Tenants Consultation** Submission# 363

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Debbie McGill	As an individual	A Council tenant	Yes

1. We propose to set City Housing tenants' rent based on their income and circumstances.  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)  
 5 Definitely Agree

2. Thinking about your response to question one, what are your reasons for your level of support?  
 I feel it needs to be altered to fit all low income people and needs more consultation

3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?  
 time to sort through I feel its not transparent enough or clear enough the intent of how it will affect us

4. Do you have any comments about our draft Social Housing Policy?  
 No comments entered

<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 361
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Jeseelaraj Thavappiragasam	As an individual	A Council tenant	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>1 Definitely Agree</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>I only receive 24 hours work money and Covid19 money so the rent should be based on this income</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>No comments entered</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?</p> <p>No comments entered</p>			



**City Housing Fairer Rents For Tenants Consultation** Submission# 523

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Joseph Renistan	As an individual	A Council tenant	Yes

1. We propose to set City Housing tenants' rent based on their income and circumstances.  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)  
 No Selection

2. Thinking about your response to question one, what are your reasons for your level of support?  
 I onlt recave 36 hours work money. So the rent should be based on this income

3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?  
 No comments entered

4. Do you have any comments about our draft Social Housing Policy?  
 No comments entered

<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 360
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Richard Cammock	As an individual	A Council tenant	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>1 Definitely Agree</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>If the rent gets to high will I have somewere to live and buy food</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>No comments entered</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?</p> <p>No comments entered</p>			

**City Housing Fairer Rents For Tenants Consultation** Submission# 536e

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Bruce McLachlan	Wellington Central Grey Power	Organisation	Yes

**1. We propose to set City Housing tenants' rent based on their income and circumstances.  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)**  
 No comments entered

**2. Thinking about your response to question one, what are your reasons for your level of support?**  
 No comments entered

**3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?**  
 No comments entered

**4. Do you have any comments about our draft Social Housing Policy?**  
 Submission:  
 • Wellington Central Grey Power Inc. believe it is necessary that there should be a level of Social Housing provided for those who may have no other affordable suitable accommodation.  
 • While the Wellington City Council (WCC) provides a significant amount of such housing, we know that any provider is between a rock and a hard place providing affordable housing and on the other hand being able to afford this.  
 • Under the current review of rentals proposed by the WCC we believe that the thresholds between the 3 tiers of Very Low, Low, and Moderate income levels are penalising some tenants, that receive only a single superannuation income with an accommodation supplement, who automatically jump into a higher tier of Low Income.  
 e.g. A single superannuant receiving \$22,039 PA would normally fall into the Very Low-Income band but if they receive a maximum accommodation supplement of \$105 PW. (\$5460 PA) they are then assessed as being on a total income of \$27,499 PA and that puts them into the Low band with an increase of rental. We believe that this affects approximately 10% of tenants.

- As we believe this is discriminating unfairly on those on low incomes the WCC should
  - o remove accommodation supplements from assessable income and,
  - o review the thresholds for each tier.Winter power subsidies for example are not included in income so why should accommodation payments given because of hardship be included.
- There is also an anomaly in that while we consider WCC Housing as "Social Housing" it is not deemed so by Government through Work and Income, rather classified as "City Housing". This significantly restricts the level of accommodation payment to a maximum of \$105 PW.
  - o We contend that WCC need to resolve the classification of WCC Housing (by Work and Income) with Govt. and have WCC Housing classified as "Social Housing".
- We have concern over the rent freeze being totally removed for the over 80s and believe that some consideration could be given to our older population, in social housing, particularly if they fall within the Very Low-income band and are suffering hardship.
- Wellington City Council should be seen as a caring "Social Housing" provider.

## Wellington Central Grey Power Incorporated Submission to Wellington City Council - Housing Rental review July 2020

### Submission:

- Wellington Central Grey Power Inc. believe it is necessary that there should be a level of Social Housing provided for those who may have no other affordable suitable accommodation.
- While the Wellington City Council (WCC) provides a significant amount of such housing, we know that any provider is between a rock and a hard place providing affordable housing and on the other hand being able to afford this.
- Under the current review of rentals proposed by the WCC we believe that the thresholds between the 3 tiers of Very Low, Low, and Moderate income levels are penalising some tenants, that receive only a single superannuation income with an accommodation supplement, who automatically jump into a higher tier of Low Income.

*e.g. A single superannuant receiving \$22,039 PA would normally fall into the Very Low-Income band but if they receive a maximum accommodation supplement of \$105 PW. (\$5460 PA) they are then assessed as being on a total income of \$27,499 PA and that puts them into the Low band with an increase of rental. We believe that this affects approximately 10% of tenants.*

- As we believe this is discriminating unfairly on those on low incomes the WCC should
  - remove accommodation supplements from assessable income and,
  - review the thresholds for each tier.Winter power subsidies for example are not included in income so why should accommodation payments given because of hardship be included.
- There is also an anomaly in that while we consider WCC Housing as “Social Housing” it is not deemed so by Government through Work and Income, rather classified as “City Housing”. This significantly restricts the level of accommodation payment to a maximum of \$105 PW.
  - We contend that WCC need to resolve the classification of WCC Housing (by Work and Income) with Govt. and have WCC Housing classified as “Social Housing”.
- We have concern over the rent freeze being totally removed for the over 80s and believe that some consideration could be given to our older population, in social housing, particularly if they fall within the Very Low-income band and are suffering hardship.
- Wellington City Council should be seen as a caring “Social Housing” provider

Cc. Hon Grant Robertson - Member for Wellington Central and Minister of Finance  
Hon Carmel Sepuloni - Minister of Social Development

Submitted by Bruce McLachlan  
V.P. Wellington Central Grey Power  
8<sup>th</sup> July 2020

<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 534
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Marigold Kani	As an individual	A Council tenant	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>5 Definitely Disagree *</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>Make a fairer rental for all tenants, working tenants amd non workers</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>Provide a service offering Wifi to tenants</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?</p> <p>No comments entered</p>			

**City Housing Fairer Rents For Tenants Consultation** Submission# 433

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Peter Deutsch	As an individual	A Council tenant	Yes

1. We propose to set City Housing tenants' rent based on their income and circumstances.  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)  
 4 Somewhat Disagree

2. Thinking about your response to question one, what are your reasons for your level of support?  
 old sick and not well off

3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?  
 Look closer into personal circumstances

4. Do you have any comments about our draft Social Housing Policy?  
 please go back to the drawing board

**City Housing Fairer Rents For Tenants Consultation** Submission# 359

Name	ON BEHALF OF:	ARE YOU	ORAL SUBMISSION:
Rowan Mooney	As an individual	A Council tenant	Yes

1. We propose to set City Housing tenants' rent based on their income and circumstances.  
How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)

3 Neither Agree or Disagree

2. Thinking about your response to question one, what are your reasons for your level of support?

I think the Council is taking a dishonest approach to peopless' income by the way they are assessing income. So while I agree that it's good to be fairer in rents, it needs to be fairly assessed

3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?

I don't believe that accomodation supplement is income for purposes of this assessment. It's not regarded as income at the moment, but is a deduction off the rent. I think you should be consistent. Its either income or it's not

4. Do you have any comments about our draft Social Housing Policy?

No comments entered



**City Housing Fairer Rents For Tenants Consultation** Submission# 378

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
David Janes	As an individual	A Council tenant	Yes

1. We propose to set City Housing tenants' rent based on their income and circumstances.  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)  
 3 Neither Agree or Disagree

2. Thinking about your response to question one, what are your reasons for your level of support?  
 No comments entered

3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?  
 No comments entered

4. Do you have any comments about our draft Social Housing Policy?  
 No comments entered

<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 389
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Ashley Janes	As an individual	A Council tenant	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>5 Definitely Disagree</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>Think its unfair system to those wanting to buy a house and those working will feel like there covering other peoples rent</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>A better proposal where everyone is paying same rent and more information</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?</p> <p>No comments entered</p>			

<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 522
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Parbhat Avtar	As an individual	A Council tenant	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances.                      How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>5 Definitely Disagree</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>we cant afford if rent will increase 30 to 50\$ per week</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>No</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?</p> <p>No</p>			

**City Housing Fairer Rents For Tenants Consultation** Submission# 537

Name	ON BEHALF OF:	ARE YOU	ORAL SUBMISSION:
Alem Tesema	As an individual	A Council tenant	Yes

**1. We propose to set City Housing tenants' rent based on their income and circumstances.  
How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)**

No comments entered

**2. Thinking about your response to question one, what are your reasons for your level of support?**

No comments entered

**3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?**

No comments entered

**4. Do you have any comments about our draft Social Housing Policy?**

I pay my way and my rent even though I don't earn a lot.  
I send money back to support my mother at home, who relies on me.  
If I don't send money then they die, they can't go out because of COVID there in Ethiopia.  
I have been here 20yrs and am a proud citizen of Wellington.  
However when we do overtime to get extra money, WCC raises the rent even though the money isn't for us, but for our families who rely on us.  
I am in a WCC rental in Kilbirnie.  
This needs to be taken into account when making decisions or policy.  
WCC helps Migrants and Refugees, that is true, but we are far from our families and are doing the best we can.  
I want to make a submission to the survey on rents so that you use this information in your policies.  
please contact me.

**City Housing Fairer Rents For Tenants Consultation** Submission# 538e

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Jackson Lacy	Wellington City Youth Council	Organisation	Yes

**1. We propose to set City Housing tenants' rent based on their income and circumstances.  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)**  
 No comments entered

**2. Thinking about your response to question one, what are your reasons for your level of support?**  
 No comments entered

**3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?**  
 No comments entered

**4. Do you have any comments about our draft Social Housing Policy?**  
 (Full document available as appendix)  
 Conclusion  
 13. Youth Council supports the proposed policy for City Housing rents, believing it to be equitable, sustainable, and in the best interest of all Wellingtonians – especially young people.  
 14. We believe more thought needs to be had on the way in which City Housing is funded, and whether or not expanding City Housing can play a part in alleviating Wellington’s housing crises.  
 15. Youth Council believes that City Housing as a whole is on the right track, but that continued focus must be had on sustainable growth, housing density, and tenants’ quality of life.  
 16. Finally, Youth Council congratulates Council on the manner in which this consultation was conducted, especially given the circumstances. Equipping City Housing tenants with the information and resources to submit on the policy, as was the case, is in absolute accord with our thinking on consultation and engagement, and we believe other business units can learn by example.

# City Housing Policy Fairer rents for tenants Submission

To Wellington City Council

*5 July 2020*

We would like to appear in person to support our submission

*Contact person:*

**Ella Flavell, Chair**  
Wellington City Youth Council

c/o Wellington City Council  
PO Box 2199, Wellington 6140

**Wellington City Youth Council**  
Te Rūnanga Taiohi o te Kaunihera o Pōneke

**Wellington City Youth Council**  
Te Rūnanga Taiohi o te Kaunihera o Pōneke

## **Introduction**

1. The Wellington City Youth Council (Youth Council) welcomes the opportunity to submit on Wellington City Council's City Housing Policy proposal for fairer rents for tenants.

## **Fairer rents for tenants**

2. Youth Council supports the proposal to set City Housing rents based on the income of the tenant.
3. The proposed changes would allow Wellington's City Housing model to better reflect the financial position of tenants.
4. These changes would remove arbitrary settings that treat all City Housing tenants as the same, with nothing at present to distinguish between tenants in different positions.
5. The changes to rent setting, moving from a blanket 30% discount on market rent for all tenants, to an income-relative rent determination, will mean that those in a tougher financial position pay less, and those with a greater ability to pay, pay more.
6. We note that City Housing is not just providing 'cheaper' housing options, but importantly offers housing options for priority groups who might otherwise struggle to access housing options.
7. The proposed changes allow for the City Housing model to be more financially stable and account for different circumstances, while retaining its ability to providing housing options to those without adequate housing.

## **Funding for City Housing**

8. The expansion and growth of City Housing holds exciting potential as a supply-side lever with which Council can influence the housing market for the benefit of Wellingtonians, and Youth Council urges Council to explore new and creative ways to fund City Housing in order to keep it and its properties sustainable, affordable, and accessible.
9. To this end, Youth Council looks forward to the 'options paper', set to go before Councillors later this year, regarding the future of City Housing's funding situation.

**Wellington City Youth Council**  
Te Rūnanga Taiohi o te Kaunihera o Pōneke**Long-term vision for City Housing**

10. Youth Council supports the long-term growth of high quality City Housing, to enable more Wellingtonians to access and benefit from the services provided. We hope that City Housing will continue to be sustainable, warm, and focussed on building communities.
11. Youth Council generally supports increased housing density, and believes that any new City Housing developments should be a mixture of medium and high-density housing. City Housing has a proven track record of building a community for tenants in such densities, and should be allowed to continue that work.
12. Youth Council supports City Housing's continued efforts to improve the quality of life of their tenants. In particular, we highlight the Government's recent moves to allow pets in social housing, and we urge Council to implement a similar policy.

**Conclusion**

13. Youth Council supports the proposed policy for City Housing rents, believing it to be equitable, sustainable, and in the best interest of all Wellingtonians - especially young people.
14. We believe more thought needs to be had on the way in which City Housing is funded, and whether or not expanding City Housing can play a part in alleviating Wellington's housing crises.
15. Youth Council believes that City Housing as a whole is on the right track, but that continued focus must be had on sustainable growth, housing density, and tenants' quality of life.
16. Finally, Youth Council congratulates Council on the manner in which this consultation was conducted, especially given the circumstances. Equipping City Housing tenants with the information and resources to submit on the policy, as was the case, is in absolute accord with our thinking on consultation and engagement, and we believe other business units can learn by example.



**City Housing Fairer Rents For Tenants Consultation** Submission# 539e

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Josh & Emily Bruce	As an individual	A Council tenant	Yes

1. We propose to set City Housing tenants' rent based on their income and circumstances.  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)  
 No comments entered

2. Thinking about your response to question one, what are your reasons for your level of support?  
 No comments entered

3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?  
 No comments entered

4. Do you have any comments about our draft Social Housing Policy?  
 (Full document available as appendix)  
 In conclusion  
 We oppose the current proposal. In developing a better policy we recommend considering:

1. Transparency with WHAM before applied so fairness and affordability can be assessed.
2. Remove or limit the moderate income tier.
  - a. Retain current tenants above threshold income, alongside asset accumulation increase, to help provide security and incentive to step up into home ownership.
  - b. Limit the moderate category by capping it at a maximum of 10% of rentals.
  - c. Set the moderate income category as a step up option, not an entry level option. This is 'affordable housing' not 'social housing'.
3. Keep a cap on rent increases. Our housing market is out of control and basing rent on a percentage of market rent will still cause rent increases faster than income, wages and benefits will increase.
4. Contribute from rates short term to alleviate the financial need for rent changes.
5. Transparency with the public is important. Many people would happily help to advocate for positive changes and the housing crisis is bigger than WCC. However, at present WCC seems to be hiding relatively substantial changes behind "Fairer rent", while there is limited ability to assess fairness based on the available information, blurring of the lines between social and affordable housing and an

income increase for city housing.

## Submission on WCC Consultation on Fairer Rents for Council Tenants

Dear Councillors,

We support the intent to “house all wellingtonians well”, but **OPPOSE the current proposal**, as it is currently written, for the reasons below.

- There are no safeguards included to prevent erosion of social housing provision for those most vulnerable over time.
- The public consultation for this proposal has been promoted as “Fairer Rents”, rather than rent and housing policy changes. This is biased and potentially miss leading.
- The proposed changes may have some benefit, but when considered in context of others WCC have made in recent years, it indicates a fundamental move away from social housing, towards affordable housing. Effectively meeting a new need, but at the cost of the most vulnerable.
- We believe the proposed changes are in part driven by a need to increase city housing revenue. This is not publicly stated. WCC seem intent on presenting a public face that says ‘we care about social housing’, while in reality have ring fenced social housing and contribute zero rate payer dollars. This seems incongruous and is simply taking credit for the investment of a previous generation.

### What is Fair

We are aware that there has been substantial research into the proposal and believe the idea of income related rent is in essence fair. However, we have concerns for the low income earners (not beneficiaries) and families under the new proposal, which does not differentiate between family size.

There is also confusion around the basket of goods concept (WHAM). The model is complex and while complexity is not bad, without greater availability of specifics at the consultation stage it is impossible to assess its affordability and fairness in different households. Specifically information needs to be shared on what is included on the list of goods, and what price has been attributed. At the moment the vague calculator does not give a clear enough picture to clearly decide on “fairness”.

The council has ample data on every tenant and the ability to calculate potential rent change implications on their behalf. It should not be up to tenants to do this for themselves, when many already face multiple barriers to engaging with WCC consultation or understanding the implications.

**Shift in the definition of social housing**

The proposal's third tier of moderate income earners, does not align with current criteria for eligibility of social housing. It sits in the affordable housing bracket.

While there is also a need for housing for people in this bracket due to an out of control rental market, we are concerned that this need will be met at the cost of "social housing" for our most vulnerable residents. There is already limited stock for social housing and the waiting list is approximately 320.

The inclusion of a moderate income bracket therefore appears to exist, simply to increase social housing revenue. This would result in a fundamental shift in what housing is being provided. With no limits or safeguards, over time, it will ultimately result in the loss of housing for our most vulnerable. If this category was to be included we believe the number of houses provided at this tier should be capped and remain at a maximum of 10% of housing stock.

We support tenants having the ability to grow income and assets over time to provide opportunity for a step up into home ownership. However we oppose a shift towards providing affordable housing at the cost of our social housing stock, and most vulnerable Wellingtonians. New tenants should enter under current criteria, with those most in need prioritised, rather than extending eligibility to include new tenants at the moderate income level.

**In conclusion**

We oppose the current proposal. In developing a better policy we recommend considering:

1. Transparency with WHAM before applied so fairness and affordability can be assessed.
2. Remove or limit the moderate income tier.
  - a. Retain current tenants above threshold income, alongside asset accumulation increase, to help provide security and incentive to step up into home ownership.
  - b. Limit the moderate category by capping it at a maximum of 10% of rentals.

- c. Set the moderate income category as a step up option, not an entry level option. This is 'affordable housing' not 'social housing'.
3. Keep a cap on rent increases. Our housing market is out of control and basing rent on a percentage of market rent will still cause rent increases faster than income, wages and benefits will increase.
4. Contribute from rates short term to alleviate the financial need for rent changes.
5. Transparency with the public is important. Many people would happily help to advocate for positive changes and the housing crisis is bigger than WCC. However, at present WCC seems to be hiding relatively substantial changes behind "Fairer rent", while there is limited ability to assess fairness based on the available information, blurring of the lines between social and affordable housing and an income increase for city housing.

Josh & Emily Bruce

City Housing Fairer Rents For Tenants Consultation			Submission# 548e
Name	ON BEHALF OF:	ARE YOU	ORAL SUBMISSION:
Julia Cottle	As an individual	A Council tenant	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>No comments entered</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>No comments entered</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>No comments entered</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?</p> <p>I want to make an oral submission to the council about these proposed changes.</p> <p>I live at Te Ara Hou flats in Newtown and many of my neighbours are not speakers of English. They have come asking me what it means and together we attended the meeting at the Newtown Flats. It was confusing and complicated. I didn't understand what it meant and I am sure my neighbours did not either.</p> <p>Fairer sounds good but for whom? The information shown to me has been discredited by other people who seem to understand it better.</p> <p>I think that the Council should seek other ways to improve their ability to make being a landlord more profitable and not at the expense of people who cannot stand up for themselves.</p> <p>I wish to make an oral submission to say that the information received was not good enough to explain to vulnerable people what was happening in the now and how the future might look as what type of neighbours they might have.</p>			

**City Housing Fairer Rents For Tenants Consultation** Submission# 547e

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Jane Julian	Citizens Advice Bureau Wellington	Organisation	Yes

**1. We propose to set City Housing tenants' rent based on their income and circumstances.**  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)

2 – Somewhat Agree

**2. Thinking about your response to question one, what are your reasons for your level of support?**

We believe that the new policy framework is a step in the right direction but has failed to address the issue of affordable rent for tenants.

**3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?**

a. The United Nations views housing as a right, not as a commodity: "Housing is the basis of stability and security for an individual or family. The centre of our social, emotional and sometimes economic lives, a home should be a sanctuary; a place to live in peace, security and dignity."

b. The national office of CAB made the following recommendations to the United Nations rapporteur on housing:

- Security of tenure needs to be a key priority where people who rent can create homes and report problems without fear of eviction.
- Ensure that every person can live in a warm, dry and healthy home by ensuring the enforcement of healthy homes standards where the burden is not on tenants to enforce standards.
- The system to sort out disputes must be fair, timely and well-resourced [abridged]
- Fix housing market by increasing the supply of affordable rental/purchase houses to avoid families tipping into emergency/social housing
- Adequate funding is needed for tenancy advocacy services [abridged]

c. Recently the United Nations Special Rapporteur on adequate housing visited New Zealand at the invitation of the Government. She characterised the housing situation in New Zealand as a human rights crisis. She made three key points in an interview

- The root of the crisis lay in the gutting of social housing and a speculative housing

market

- The government has entrusted, in large part, housing to private property owners and real estate investors
- There are enough dwellings but supply only caters to those who can afford them

d. New Zealand is a signatory to the United Nations Sustainable Development Goals. Goal 11.1: "By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums".

e. Measures of affordability: There are many and diverse measures of affordability. Here is a small sample. Community Housing NZ reports "An internationally adopted standard for defining affordability in housing is that residents should spend no more than 30% of their gross household income (GHI) on housing costs". Or First Homebuyers Club: "75% of the median Auckland house price". And OECD suggests that "Households that spend more than 40% of disposable income on housing are considered "overburdened"".

f. Citizens Advice Bureau Wellington (WelCAB) recognises the significant amount of work undertaken to improve the quality of social housing in Wellington since 2007 and the scope of work embodied in the proposed policy framework for City Housing and its tenants. The new framework is a step in the right direction. We particularly note the tension between financial viability for City Housing and affordability for tenants.

g. We applaud the desire to make rents fairer for City Housing tenants and we note that the majority of tenants are singles living alone (Table 4). We also note the information contained in Table 5 which shows the average shift in rent paid by household type and income band.

h. In the last year WelCAB received 989 enquiries about tenancies and flatting, 64 enquiries seeking emergency accommodation (most of these clients are already registered with housing providers) and 30 enquiries about Boarding establishments (most of these clients are in housing that does not meet their needs).

i. We have limited our comments to affordability of housing. We note in particular Table 1 of the report on the Wellington City Council Housing Strategy and housing Action Plan 2020-22 dated 12 March (WCC report).

j. Affordability: The proposed policy framework will increase the discounted market rental by 10% from 30% discount (current) to 40% for tenants in the lowest income band. This means that a tenant on the lowest income band will pay 60% of market rent. Market rent is set every 2 years by an independent assessor.



k. We have noted that affordability has been checked against the Wellington Housing Affordability Model (WHAM). WHAM acknowledges that affordability will vary for different population groups and it helpfully looks at what a basket of goods looks like for different groups and what it is reasonable for them to pay for housing, taking into account their expenses.

l. We have assumed that the market rent will be similar to the market rents reported on the Tenancy Services website. We believe that the policy should use the OECD measure of affordability as a key principle that overrides the discounted market rent. Thus, if the discounted market rent is higher than 40% of disposable income then the rent should be further discounted to 40% of the tenant's income.

m. Using Ministry of Social Development and Tenancy Services data if a tenant is not eligible for the accommodation supplement then discounted market rental will be unaffordable. The basic benefit for a job seeker is \$246pw and many beneficiaries in this category are not eligible for the accommodation supplement. The lowest market rent in Wellington, discounted as proposed, would be \$177pw. This would leave \$69 to live on. The proposal is an improvement but it is not affordable.

#### 4. Do you have any comments about our draft Social Housing Policy?

(Full document available as appendix)

a. Enhanced Services: The documents recognise that many of City Housing tenants are on low income and have a range of additional needs. The proposed Enhanced Services to Door Policy will go a long way towards improving the level of care available to tenants if it is adequately staffed.

b. Security of Tenure: We are particularly pleased to see that security of tenure has been retained for tenants who fall below the income and asset thresholds. However, we are very concerned that for people whose situation in life has improved, the spectre of eviction has emerged. City Housing say they will "work closely with tenants and other support agencies to transition to a private rental or home ownership". We suggest that achieving an appropriate transition will be extremely challenging in the current housing climate.

c. Finances: WelCAB is dismayed that City Housing is in such a parlous state financially and we note that the proposal will improve their finances to close to break-even by 2028.

d. Wellington City Council received a large injection of funds from central government in 2007 to improve the standard of social housing and retain approximately the same amount of accommodation. It is disappointing to see that this injection of capital is not matched by operational assistance available to other providers in the form of Income Related Rent Subsidies.


 Citizens Advice Bureau

Ngā Pou Whakawhirinaki o Aotearoa

P O Box 24 093, Wellington 6142  
welcab@cab.org.nz

To: Wellington City Council  
By email to housing [policy@wcc.govt.nz](mailto:policy@wcc.govt.nz)  
25 June 2020

## Submission – Fairer Rent for Tenants?

### Section 1

Names of submitters: Mike Regan, Chair, and Jane Julian, Area Manager  
Email: [welcab@cab.org.nz](mailto:welcab@cab.org.nz)

We are making this submission on behalf of Citizens Advice Bureau Wellington  
*We would like to make an oral submission.*

### Section 2 – questions about fairer rents for tenants and the draft social housing policy

1. We (WCC) propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal?  
We somewhat agree.
2. Thinking about your response to question one, what are your reasons for your level of support?

We believe that the new policy framework is a step in the right direction but has failed to address the issue of affordable rent for tenants.

3. Do you have any other comments about our proposal to set City Housing tenants' rents based on their income and other circumstances?
  - a. The United Nations views housing as a right, not as a commodity: "Housing is the basis of stability and security for an individual or family. The centre of our social,

emotional and sometimes economic lives, a home should be a sanctuary; a place to live in peace, security and dignity.”<sup>1</sup>

- b. The national office of CAB made the following recommendations to the United Nations rapporteur on housing:
- Security of tenure needs to be a key priority where people who rent can create homes and report problems without fear of eviction.
  - Ensure that every person can live in a warm, dry and healthy home by ensuring the enforcement of healthy homes standards where the burden is not on tenants to enforce standards.
  - The system to sort out disputes must be fair, timely and well-resourced [abridged]
  - Fix housing market by increasing the supply of affordable rental/purchase houses to avoid families tipping into emergency/social housing
  - Adequate funding is needed for tenancy advocacy services [abridged]
- c. Recently the United Nations Special Rapporteur on adequate housing visited New Zealand at the invitation of the Government. She characterised the housing situation in New Zealand as a human rights crisis. She made three key points in an interview<sup>2</sup>
- The root of the crisis lay in the gutting of social housing and a speculative housing market
  - The government has entrusted, in large part, housing to private property owners and real estate investors
  - There are enough dwellings but supply only caters to those who can afford them
- d. New Zealand is a signatory to the United Nations Sustainable Development Goals. Goal 11.1: “By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums”.
- e. Measures of affordability: There are many and diverse measures of affordability. Here is a small sample. Community Housing NZ reports “An internationally adopted standard for **defining affordability in housing** is that residents should spend no more than 30% of their gross household income (GHI) on **housing costs**”<sup>3</sup>. Or First Homebuyers Club: “75% of the median Auckland

<sup>1</sup> <https://www.ohchr.org/EN/Issues/Housing/Pages/HousingIndex.aspx>

<sup>2</sup> RNZ interview 19 February 2020 <https://www.rnz.co.nz/news/national/409900/un-special-rapporteur-calls-on-nz-for-bold-human-rights-approach-to-housing-crisis>

<sup>3</sup> [http://www.communityhousing.org.nz/resources/article/a-housing-plan-for-new-zealand#:~:text=An%20internationally%20adopted%20standard%20for,\(GHI\)%20on%20housing](http://www.communityhousing.org.nz/resources/article/a-housing-plan-for-new-zealand#:~:text=An%20internationally%20adopted%20standard%20for,(GHI)%20on%20housing)

house price"<sup>4</sup>. And OECD suggests that "Households that spend more than 40% of disposable income on housing are considered "overburdened"<sup>5</sup>.

- f. Citizens Advice Bureau Wellington (WelCAB) recognises the *significant* amount of work undertaken to improve the quality of social housing in Wellington since 2007 and the scope of work embodied in the proposed policy framework for City Housing and its tenants. The new framework is a step in the right direction. We particularly note the tension between financial viability for City Housing and affordability for tenants.
- g. We applaud the desire to make rents fairer for City Housing tenants and we note that the majority of tenants are singles living alone (Table 4). We also note the information contained in Table 5 which shows the average shift in rent paid by household type and income band.
- h. In the last year WelCAB received 989 enquiries about tenancies and flatting, 64 enquiries seeking emergency accommodation (most of these clients are already registered with housing providers) and 30 enquiries about Boarding establishments (most of these clients are in housing that does not meet their needs).
- i. We have limited our comments to affordability of housing. We note in particular Table 1 of the report on the Wellington City Council Housing Strategy and housing Action Plan 2020-22 dated 12 March (WCC report).
- j. Affordability: The proposed policy framework will increase the discounted market rental by 10% from 30% discount (current) to 40% for tenants in the lowest income band. This means that a tenant on the lowest income band will pay 60% of market rent. Market rent is set every 2 years by an independent assessor.
- k. We have noted that affordability has been checked against the Wellington Housing Affordability Model (WHAM). WHAM acknowledges that affordability will vary for different population groups and it helpfully looks at what a basket of goods looks like for different groups and what it is reasonable for them to pay for housing, taking into account their expenses.
- l. We have assumed that the market rent will be similar to the market rents reported on the Tenancy Services website. We believe that the policy should use the OECD measure of affordability as a key principle that overrides the discounted market rent. Thus, if the discounted market rent is higher than 40% of

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[%20costs.&text=To%20illustrate%20this%20at%20an,across%20Auckland%20is%20approximately%20%2490%2C000.](#)

<sup>4</sup> <https://www.thefirsthomebuyersclub.co.nz/affordable-housing-auckland/>

<sup>5</sup> <https://www.oecd.org/els/family/HC1-2-Housing-costs-over-income.pdf>

disposable income then the rent should be further discounted to 40% of the tenant's income.

- m. Using Ministry of Social Development and Tenancy Services data if a tenant is not eligible for the accommodation supplement then discounted market rental will be unaffordable. The basic benefit for a job seeker is \$246pw and many beneficiaries in this category are not eligible for the accommodation supplement. The lowest market rent in Wellington, discounted as proposed, would be \$177pw. This would leave \$69 to live on. The proposal is an improvement but it is not affordable.

**We recommend that the policies are amended to ensure that no tenant in the lowest income band pays more than 40% of their disposable income in rent.**

- 4. Do you have any other comments about our new draft Social Housing Policy?
  - a. Enhanced Services: The documents recognise that many of City Housing tenants are on low income and have a range of additional needs. The proposed Enhanced Services to Door Policy will go a long way towards improving the level of care available to tenants if it is adequately staffed.
  - b. Security of Tenure: We are particularly pleased to see that security of tenure has been retained for tenants who fall below the income and asset thresholds. However, we are very concerned that for people whose situation in life has improved, the spectre of eviction has emerged. City Housing say they will "work closely with tenants and other support agencies to transition to a private rental or home ownership". We suggest that achieving an appropriate transition will be extremely challenging in the current housing climate.
  - c. Finances: WelCAB is dismayed that City Housing is in such a parlous state financially and we note that the proposal will improve their finances to close to break-even by 2028.
  - d. Wellington City Council received a large injection of funds from central government in 2007 to improve the standard of social housing and retain approximately the same amount of accommodation. It is disappointing to see that this injection of capital is not matched by operational assistance available to other providers in the form of Income Related Rent Subsidies.

Mike Regan  
Chair

Jane Julian  
Area Manager

**City Housing Fairer Rents For Tenants Consultation** Submission# 549e

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Vera Andrews	As an individual	Family of a Council tenant	Yes

**1. We propose to set City Housing tenants' rent based on their income and circumstances.  
How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)**  
No comments entered

**2. Thinking about your response to question one, what are your reasons for your level of support?**  
No comments entered

**3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?**  
No comments entered

**4. Do you have any comments about our draft Social Housing Policy?**  
I am the Mother of an adult who has a tenancy with WCC.

I am concerned that the proposed changes do not acknowledge the need for social housing within the City of Wellington. I have found the information provided to my daughter complicated while she may not be adversely affected, I am concerned that people in a similar situation to her in the future will be.

My daughter has a head injury and was in a violent relationship that had significant adverse effects upon her two children. Her being able to access housing through the council has allowed her to live a reasonably independent life, care for children and these children to be raised in a stable community where they have continuity of schools and support services around them.

I am concerned that the new policy will choose higher earning tenants over people like my daughter and further compound the issues that this family would have experienced without the stability of quality, affordable housing with long term tenancies.

I wish to make an oral submission on the proposed changes to the policy.

<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 550e
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Debbie Port	As an individual	A Council tenant	Yes
<p><b>1. We propose to set City Housing tenants' rent based on their income and circumstances.</b>                      How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>5 definitely disagree</p>			
<p><b>2. Thinking about your response to question one, what are your reasons for your level of support?</b></p> <p>I do not support this rent proposal at all as it will have a negative impact on alot of vulnerable people you are meamt to be helping and that does not sit right to me. Tenants should be getting access to that government. Subsidy</p>			
<p><b>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</b></p> <p>There is a better way the income related rent subsidy housing nz twnants get</p>			
<p><b>4. Do you have any comments about our draft Social Housing Policy?</b></p> <p>It does not help people it punnishes people who need housing and it will cause people to become homeless in the future because they cannot afford the rent.</p>			

<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 25
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Paul De-Lacy	As an individual	A Council tenant	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>1 Definitely Agree</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>It's getting harder to pay rents for some people who are on pensions and do not have other income and have to pay more for food and power costs.</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>It's good that the government increased the energy payments for winter, because that helps many people. But it's still a struggle to pay rents as they are too high.</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?</p> <p>It's important that social housing is affordable. For many people, especially beneficiaries and pensioners and people with low incomes. Over the last several years, it has become unaffordable for many who are struggling to pay rent due to Council policies, which changed from early times.</p>			



**City Housing Fairer Rents For Tenants Consultation** Submission# 386

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Ngaire Lambert	As an individual	A Council tenant	Yes

1. We propose to set City Housing tenants' rent based on their income and circumstances.  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)

1 Definitely Agree

2. Thinking about your response to question one, what are your reasons for your level of support?

I really cant afford a \$60 increase in rent

3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?

No comments entered

4. Do you have any comments about our draft Social Housing Policy?

No comments entered

<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 413
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Nahulesvaran Nadarasa	As an individual	A Council tenant	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>No selection</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>No comments entered</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>No comments entered</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?</p> <p>No comments entered</p>			

**City Housing Fairer Rents For Tenants Consultation** Submission# 540e

<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Sacha Green	As an individual	A Council tenant	Yes

**1. We propose to set City Housing tenants' rent based on their income and circumstances.  
 How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)**  
 3 Neither Agree or Disagree

**2. Thinking about your response to question one, what are your reasons for your level of support?**  
 I don't believe this is a straightforward question to answer. On face value it reads as something that is sensible and intuitively feels right. But the question masks the complexity of the issue, and the reality that 'the market' is another significant factor in the mix here and that 'fairness' may not mean rents are equitable or affordable.

**3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?**  
 See full submission below.

**4. Do you have any comments about our draft Social Housing Policy?**  
 (Full document available as appendix)  
 The key points in my submission are:  
 1. We are in a housing crisis and need to be approaching this in the context of housing as a fundamental human right. Affordability is a critical part of this and it is not clear whether this policy ensures that housing remains affordable for low-income tenants.  
 2. The description of this policy as being about 'Fairer rents for Council tenants' is an inappropriate starting point for genuine consultation. It attributes a positive value to the policy that should have been left as an open question to be examined and determined.  
 3. Consultation has been inadequate. This is a significant policy change and more direct engagement with tenants is needed to ensure people who face barriers to participation are included and heard.  
 4. The motivations underlying this policy are in conflict. The focus on generating additional income from tenants' rents (estimated to be an additional \$1.5 million per annum) appears to have outweighed the stated goal of fairness, and the more appropriate goal of affordability.  
 5. Fairness, as proposed by this policy, does not necessarily equate to equity, and does not guarantee affordability. Affordability is more appropriately worked out by

looking at rent as a percentage of income, not using income to determine percentage of market rent. The market is not an appropriate tool to use to determine fairness, equity, or affordability.

6. Tenants have been advised that any Accommodation Supplement (AS) they currently receive is considered income. This seems to create a nonsense situation of using the AS to determine future rent, which then determines eligibility / entitlement to the AS.

7. More attention needs to be given to how this policy will impact on larger families. Currently all families have been lumped in one basket in terms of income thresholds and no account has been taken of different living costs and rental costs for larger households. This is particularly concerning because of the potential detrimental impacts on children.

Submission on City Housing Rent-setting policy - July 2020

To: Wellington City Council  
By email to: [housingpolicy@wcc.govt.nz](mailto:housingpolicy@wcc.govt.nz)  
Date: 5 July 2020

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### Section 1 — your details

- Your name: Sacha Green
- Your email or postal address:
- You are making this submission: as an individual.
- I am a Council tenant / a community volunteer supporting tenants / a member of the Public.
- I would like to make an oral submission to the Councillors.
- If yes, please give your phone number so that a submission time can be arranged.

### Section 2 — questions about fairer rents for tenants and the draft social housing policy

1. We propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal?\*

\* 3 - neither agree nor disagree

2. Thinking about your response to question one, what are your reasons for your level of support?\*

I don't believe this is a straightforward question to answer. On face value it reads as something that is sensible and intuitively feels right. But the question masks the complexity of the issue, and the reality that 'the market' is another significant factor in the mix here and that 'fairness' may not mean rents are equitable or affordable.

3. Do you have any other comments about our proposal to set City Housing tenants' rents based on their income and other circumstances?

See full submission below.

4. Do you have any other comments about our new draft Social Housing Policy?

See full submission below.

Submission on City Housing Rent-setting policy - July 2020

**Submission on WCC's City Housing rent-setting policy consultation  
– "Fairer rents for Council tenants"**

Sacha Green

Kia ora koutou

Thank you for the opportunity to make a submission on the proposed Council rent-setting policy for City Housing tenants.

**Introduction**

I live with my husband and four children (aged 8, 11, 13 and 15) in a 3-bedroom apartment at Berkeley Dallard, one of the Council's largest complexes. I have been involved in community work in the inner city for the past 20 years and have worked with City Housing in a voluntary community-building role for the past 6 years.

I am concerned that many tenants don't really know what is being proposed by this policy or how it will impact on them. Many are also feeling anxious and unsettled about possible rent increases and the prospect that it will become unaffordable for them to stay in their homes.

The key points in my submission are:

1. We are in a **housing crisis** and need to be approaching this in the context of **housing as a fundamental human right**. **Affordability is a critical part of this** and it is not clear whether this policy ensures that housing remains affordable for low-income tenants.
2. The **description of this policy** as being about 'Fairer rents for Council tenants' is an **inappropriate starting point for genuine consultation**. It attributes a positive value to the policy that should have been left as an open question to be examined and determined.
3. **Consultation has been inadequate**. This is a significant policy change and more direct engagement with tenants is needed to ensure people who face barriers to participation are included and heard.
4. The **motivations underlying this policy are in conflict**. The focus on generating additional income from tenants' rents (estimated to be an additional \$1.5 million per annum) appears to have outweighed the stated goal of fairness, and the more appropriate goal of affordability.
5. Fairness, as proposed by this policy, **does not necessarily equate to equity, and does not guarantee affordability**. Affordability is more appropriately worked out by looking at **rent as a percentage of income**, not using income to determine percentage of market rent. The market is not an appropriate tool to use to determine fairness, equity, or affordability.
6. Tenants have been advised that any Accommodation Supplement (AS) they currently receive is considered income. This seems to create a **nonsense situation of using the AS to determine future rent**, which then determines eligibility / entitlement to the AS.
7. More attention needs to be given to how this policy will **impact on larger families**. Currently all families have been lumped in one basket in terms of income thresholds and no account has been taken of different living costs and rental costs for larger households. This is particularly concerning because of the potential detrimental impacts on children.

2

Submission on City Housing Rent-setting policy - July 2020

**1. We are in a housing crisis**

1.1 As highlighted in the *End of Mission Statement* by Leilani Farha, UN Special Rapporteur on Housing, following her recent visit to New Zealand, “it is widely recognized including within government that there is a housing crisis in New Zealand.”<sup>1</sup> This largely reflects a lack of appropriate, healthy, affordable housing, and the results of a long-term cultural obsession with housing as an investment commodity, rather than as a fundamental human right.

1.2 I am grateful that Wellington is a city that has invested in social housing and commits to providing “appropriate and affordable housing to low-income households who otherwise have barriers to accessing housing”.<sup>2</sup> I am concerned however, that the proposed policy change around rent setting for City Housing tenants does nothing to further this goal and may in fact undermine it.

**2. Misleading communication – fairer rents?**

2.1 I am deeply concerned with the way this consultation has been framed and communicated to tenants. To put out a document that has a headline of ‘Fairer rents for Council tenants’ is disingenuous. It immediately places a value judgement on the changes being proposed, rather than asking the question and consulting on whether people believe that the proposals make things fairer, or not.

2.2 Some tenants will have seen the headline and believed in good faith that the Council wants to improve their situation. Fairer must mean things will be better, right? The assumption and overt claim of fairness is an inappropriate starting point for a genuine consultation.

**3. Inadequate consultation**

3.1 In March 2020, when the consultation was due to begin, posters went up around City Housing complexes announcing that ‘fairer rents for tenants’ were on the way. These posters advertised face-to-face meetings where council officers would present information and explain the proposed policy changes to tenants. Then Covid-19 happened and the process was postponed.

3.2 With the revived consultation happening during June, there has not been the same offer of meetings with tenants this time around. The summarised policy has been delivered to tenants with a simple survey that essentially asks how strongly the submitter agrees or disagrees with the idea that rents should be based on income and circumstances. This is a statement that it is easy to agree with, but it fails to reflect the realities of what the policy intends or to help people to understand what it will actually mean for them.

3.3 There has been very little visibility of this consultation process and much of the work of raising awareness has been carried out by community advocates and concerned tenants. I

<sup>1</sup>[https://www.hrc.co.nz/files/6015/8207/2654/End\\_of\\_Mission\\_Statement\\_Visit\\_of\\_the\\_Special\\_Rapporteur\\_on\\_the\\_right\\_to\\_adequate\\_housing\\_to\\_New\\_Zealand\\_Leilani\\_Farha\\_Wellington\\_19\\_February\\_2020\\_.pdf](https://www.hrc.co.nz/files/6015/8207/2654/End_of_Mission_Statement_Visit_of_the_Special_Rapporteur_on_the_right_to_adequate_housing_to_New_Zealand_Leilani_Farha_Wellington_19_February_2020_.pdf)

<sup>2</sup>A Policy for Wellington City Council’s SOCIAL HOUSING SERVICE (May 2010)

<https://wellington.govt.nz/~media/your-council/plans-policies-and-bylaws/plans-and-policies/a-to-z/housing-social/files/housing.pdf>

Submission on City Housing Rent-setting policy - July 2020

believe the consultation has been inadequate. I am particularly concerned about the lack of proactive Council engagement about this policy with tenants who speak English as a second language, with tenants who may face barriers in terms of literacy, or to assist tenants where there are issues of digital exclusion and difficulty accessing the online information and rent calculator. Tenants have been invited to ask questions and take the proactive steps themselves to reach out (ie, via their tenancy advisors) and get informed. However, this degree of 'consultation' is inadequate given the significance of the decisions being made and the barriers faced by some of those who will be most impacted.

- 3.4 My overwhelming sense is that many tenants are either unaware of what the proposed policy will mean for them, or are aware and are confused and worried. In order to genuinely consult with those who will be affected by this policy change, I believe that the Council could have provided all existing tenants with individualised information, based on their last rent review – ie, *Last rent review you told us that your household income was X. Based on this income, on your household type, and on the current market rent for your tenancy, your rent under the proposed policy change would be Y.* Given the Council's modelling relies on this data, this information could have and should have been provided to tenants. This would allow tenants to have a genuine understanding of how this policy may affect them.
- 3.5 The rent calculator is helpful but relies on people having digital access, some degree of digital literacy, and motivation to use this tool. As stated – the presentation of the policy as being about increased fairness has not set an appropriate scene for motivating engagement.
- 3.6 I would like to see this consultation process extended with an undertaking to:
- Provide every current City Housing tenant with a letter setting out how the policy would apply to their specific situation (based on their previous rent review).
  - Hold hui for tenants for the purpose of explaining the policy and supporting people's understanding, with support and devices on hand to help people use the rent calculator if they wish.
  - Ensure hui are available at times and locations that will meet the needs of different tenants, including workers and those with young children.
  - Ensure information is communicated in a range of languages.

#### 4. Conflicting motivations underlying the policy

- 4.1 While this proposed policy has been framed as being about fairness there is also an acknowledgement that this is about generating additional income that is desperately needed for Council to be able to sustain its social housing programme and meet its obligations under the 2008 Deed of Grant with central government. In the agenda documents prepared for the Strategy and Policy Committee meeting on 12 March 2020,<sup>3</sup> it was indicated that the proposed changes would generate an additional \$1.5 million for Council.

<sup>3</sup> <https://wellington.govt.nz/~media/your-council/meetings/committees/strategy-and-policy-committee/2020/12-march/2020-03-12-agenda-strategy-and-policy-committee.pdf>, p 42.



Submission on City Housing Rent-setting policy - July 2020

- 4.2 While this increase in revenue is arguably small in terms of the overall costs that Council faces in maintaining and upgrading its social housing stock, it is a significant sum when it is coming out of the pockets of Council tenants. Based on Council's modelling this \$1.5 million would be coming from 840 households (42% of 2,000 tenancies), averaging out as an additional \$1,785 in rent per annum for these households. I am concerned that the focus on generating additional revenue for City Housing is driving these changes, more so than a genuine concern for ensuring rents for Council tenants are fair and affordable. It is also pushing the target demographic for City Housing's tenancies towards those on higher incomes as these tenants will be the only ones able to pay the newly defined 'affordable rents'.
- 4.3 I believe Council should be prepared to have a more open conversation about City Housing's current financial predicament with the wider Wellington community. This includes giving the community the chance to debate whether a rates contribution could be part of the solution rather than focusing solely on rental incomes from tenants as the answer to the sustainability of City Housing. Alongside this is the need for ongoing conversations with central government about access to the Income Related Rent Subsidy (IRRS) for Council tenants.

## 5. Fairness versus affordability

- 5.1 This policy is premised on the idea that it promotes fairness – if you earn less you pay less, if you earn more you pay more. On the face of it, this is an entirely reasonable proposition. Rent based on income and circumstances sounds great. However, fairness in this context does not necessarily equate to equity and does not guarantee affordability. Two households with the same income that fall in the same household category type (eg, single person, family, retiree) could still be required to pay significantly different rent, depending on the particular property they live in. This reflects the problems with using 'the market' to dictate affordability.
- 5.2 I acknowledge that the Council has done some work to assess this policy against the Wellington Housing Affordability Model (WHAM). In the agenda document for the Strategy and Policy Committee meeting it notes:
- When applying WHAM to the proposed rent settings, it confirmed the vast majority of our tenants will be paying a more affordable rent. While there are a few exceptions, many of these can be mitigated moving forward by using a tailored allocation approach.<sup>4</sup>*
- However, there is not enough transparency around WHAM to genuinely assess affordability.
- 5.3 A more appropriate approach would be to cap rent levels at a percentage of the tenant's household income. Community Housing NZ states that: "An internationally adopted standard for defining affordability in housing is that residents should spend no more than 30% of their gross household income (GHI) on housing costs."<sup>5</sup> At this stage, the policy proposes to use income and household type to determine percentage of market rent to be

<sup>4</sup> See above note 3, p 43.

<sup>5</sup> <http://www.communityhousing.org.nz/resources/article/a-housing-plan-for-new-zealand>.

Submission on City Housing Rent-setting policy - July 2020

paid, rather than using income and household type to determine percentage of income to be paid. These are two very different things.

**6. Accommodation supplement as income?**

- 6.1 Council has indicated that the Accommodation Supplement (AS) is to be treated as income for the purposes of working out the percentage market rent a City Housing tenant should pay. For some tenants this will impact significantly on the level of market rent they are then expected to pay. I am unclear why the AS is being treated as income to determine rent, as eligibility for the AS, and level of AS, is something that is worked out after rent is known.

**7. Impact on larger families**

- 7.1 Under the proposed policy, the income bands for different household types lump all families together in one category, regardless of family size. This may result in significant inequities as larger families can face substantially higher costs, both in terms of general living costs, but also in terms of the rent required on a larger tenancy. This is particularly concerning given the potential impacts on vulnerable children.
- 7.2 Previously the Council's social housing policy has built in a recognition in the income thresholds that the costs of living (including rent) for these families are greater. This is something that needs further consideration, especially given the substantial market rents on some of these properties.

<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 542e
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Bridget Baker	As an individual	Member of public	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances.                      How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>No comments entered</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>No comments entered</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>No comments entered</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?                      (Full document available as appendix)                      Vote NO to this policy, AND, in developing a better policy</p>			

Submission on Consultation "Fairer Rents for Council Tenants", 5 July 2020

Bridget Baker, [REDACTED]

Dear Councillors

I applaud WCC intent to see "All Wellingtonian's well housed", as also an intent to create fairer social housing rents. There are some aspects of this policy I agree should be part of policy going forward.

**However as it is, this policy falls far short of these goals, and should not be passed. In many respects it exacerbates inequity.**

I know a huge amount of genuine investment has gone into this policy. But it is also clear that financial concerns of Council are a much larger driver and influencer, than the promoted aim of addressing inequity. To address inequity more cohesively, there are a number of changes I believe need to be made.

In this submission I quote numbers. For clarification of these, I refer to the attached base chart, from the full policy presented in March. I have added information given at a tenant presentation, obtained from the policy team, and from the WCC website. The most important aspect of this chart can be found by noting the comparison with highlighted current eligibility criteria (also attached for ease of reference).

#### WHY THIS POLICY IS NOT FAIRER

1. There is huge shift in the definition of what is "social housing". A new group of "moderate income" earners are made eligible. I believe most Wellingtonians, would be surprised and dismayed to find this group included in "social housing policy". It reflects what most people would commonly associate with a definition of "affordable" housing for middle income earners.
  - Almost all tenants under current criteria should be in the very low, and low income bands. The exceptions are the highest earning single adults (between \$724 and \$889/week) and the largest families of 4 or 5 children. (who may earn up to \$1675 or \$1845 respectively), who reach the lower end of the moderate band. The policy team confirms that current tenants are not represented at the upper end of these moderate bands.
  - It is possible under the current policy, for tenants who go over threshold, to remain in City Housing.
    - If **assets** are over threshold - you pay 100% market rent.  
<https://wellington.govt.nz/services/community-and-culture/housing-support/council-housing/how-to-apply/eligibility> (see assets section)
    - If **income or assets** are reviewed and you are over threshold you can be asked to leave (given 12 months to make arrangements), and rent increases up to 90% of market rent.  
<https://wellington.govt.nz/services/community-and-culture/housing-support/council-housing/how-to-apply/rent-prices-and-bonds> (see rent reviews section)
  - WCC has accumulated a number of people (particularly 2 adult households) who are well outside of eligibility criteria, either within the 12 month grace period, or retained by WCC for other reasons. If current policy is being followed, then the new policy will not result in increased income from these tenants, already paying market rent.
  - The current waiting list is 320. Approximately 75% are singles/couples and 25% are families.

- These last two points suggest that WCC **may** already have deviated from their policy for revenue reasons. There are eligible tenants waiting, and tenants retained who may no longer need the social housing service on the basis of income. (Not withstanding that disability or other priority concerns may apply to some.)
  - While priority needs are still taken into account, there are no concrete “caps” on how many future tenants would be sourced from each of these three bands. WHAM allows a subtle reversal in the allocation of housing, as it can be applied to lower incomes. Instead of, “Can these tenants afford this housing? What needs to be done so they can?” it becomes “Is this the right housing for this group of people?” This loosely worded policy can be future interpreted to say that social housing applicants of a similar demographic to our current low income tenants, could well be told that their housing need and circumstances “do not match” this housing.
  - The proposed increase in asset level to enable people to access purchasing a home in the housing market seems targeted at the moderate income band. I would like to see current tenants have such a pathway to step up. It seems unlikely with increased rents.
2. There is not sufficient transparency around WHAM to assess the fairness, and in particular, the affordability of the changes in rent for people who fall in the middle (low income band). 71%-99% of market rent can be an abrupt and large increase. I can present situations where this would appear to force people out of WCC housing, without clarity of where else they can afford. This would appear most true of the “working poor”, but may also affect some groups of beneficiaries. I hope to present scenarios in my oral submission.

In summary, the inclusion of this moderate income band, leaves it wide open for WCC to shift away from what the general public would consider “social housing”, and move to an “affordable housing” market for higher incomes. Yes, there are barriers to the market for these people now too, however, reallocating a very limited number of social housing places to this group is shortsighted and compassionately questionable. This is a greater inequity that the intra-tenant inequities you are hoping to address. There is a waiting list, and “all Wellington well housed” means reserving places for low income members of our community into the future.

Social Housing portfolio, would be a “drop in the bucket” of the “affordable housing market”. There are other more important ways to address these barriers to moderate earners accessing housing. I know WCC is working on some of these, and they will take time. We want to call on the government to make more changes too.

#### HOW DO WE ACHIEVE BOTH FINANCIAL SUSTANTABILITY AND EQUITY?

COVID has shown us that transparency and integrity of information, and constant calling us to the common good, can go a long way towards helping us as a nation navigate unpalatable change, and even hardship.

The housing crises is also such a crisis. It affects almost everyone. And there are changes that all can make towards the common good.

Practically:

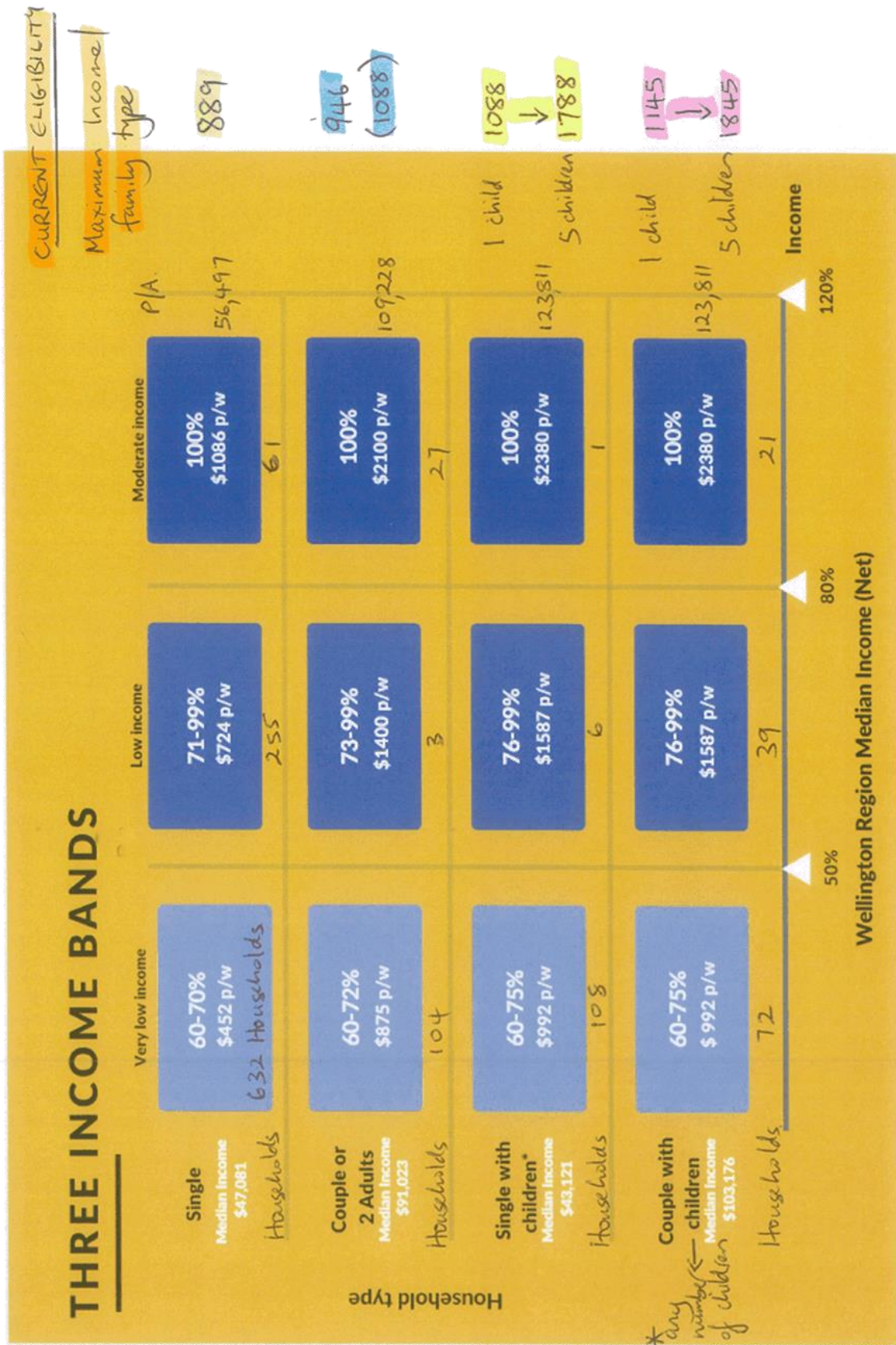
Vote NO to this policy, AND, in developing a better policy:

1. Yes, have an income related scale of rents. This is reasonable and fair, BUT only constitutes “social housing” if it is matched to affordability. SO,
2. Allow WHAM to be transparently assessable, before it is applied to our more vulnerable members. Not all tenants will agree it is fair. However, if the model is fully and transparently available, the public should be able to assess it’s fairness and affordability. Aware of people and their budgets, I am currently doubtful about this.
3. Remove, or greatly limit the “moderate income” category.
  - a. RETAIN people who move above threshold incomes and can afford market rent, ONLY if there is a genuine pathway for these people to continue to step up their income, increase their savings and move to home ownership. Having a different asset threshold for this group of people makes sense, and does provide security of tenure and a real incentive of a step up.
  - b. However, also limit both the number of years people can be retained as social housing tenants under this category, and limit the size of the category. Do not increase it above 10%. There will be a limit to the number of people that WCC can help in this way, and there will be difficulties with judgement on who, and how long, people should get this opportunity for.
  - c. Do not enable new entrants to social housing, to ENTER “social” housing, beginning at this high level of income, UNLESS there are no current tenants in a position to take that step up, and the cap on percentages of tenancies allocated at MR has not been reached. The upper extreme should be much less than 120% of Median Wellington income. Wellington’s median is high, as we know it, and this moderate income group does not need “social” housing.
4. Yes, remove inequitable and ad-hoc caps, BUT work to find collaboration with government so that at the bottom of the scale, there is a minimum living allowance that no-one is left to fall below. As I understand it, it is likely that government should also be thinking about reviewing the equity of IRRS as well.
5. SO, be transparent with the public, so that we can join you in advocating for strong and good solutions for the long term. IRRS or it’s replacement should be available equitably across all social housing providers, and there should be a consistent level of public accountability on how these portfolios are managed strategically.
6. Input from Rates in the short term. The cap on the maximum increase tenants would face each year, is there for a reason. In an out of control rental market, increases in rents tied to market prices will always outpace increases in minimum, living wages and benefits. To genuinely providing social housing for vulnerable and lower income people, we must expect to subsidise in times of change, while more adequate solutions are worked out. Some of the reason that social housing is in crisis, has been due to limitations in planning and decision making by previous councils. It is important our most vulnerable people are not the ones left to carry the consequences, and are protected in the wider housing crisis.

Finally, the social housing affordability crisis, as is the wider housing crisis, is largely due to market forces, that will not go away unless the entire system is substantially altered. We need to transparently discuss these issues. This is not a WCC issue alone, but public lobbying is made much stronger by having the facts in full view – so please, be transparent.

Thank you

Bridget Baker



### Who can get Council housing

To be eligible for a Council City Housing property, you must have low income and assets.

As well as low income and assets, you must be all of the following to qualify:

- without adequate housing
- 18 years or older
- a permanent resident, or a New Zealand citizen, or a new arrival who has submitted an application for permanent residence or refugee status.

When you meet with the Allocations Advisor as a part of your application process, you could be placed in one of the following priority groups.

Priority group	Description
The fit elderly	Those able to maintain an independent lifestyle at the time of application
Refugees and migrants	Recently arrived through the quota, asylum seekers accepted by Immigration New Zealand as refugees, and people entering the country under humanitarian or family reunification categories
Low-level psychiatric	Those people able to maintain an independent lifestyle with minimum supervision and support
Multiple disadvantaged	Households with a number of problems that make them vulnerable in the housing market
People with physical disabilities	People with specific accommodation needs as they have a disability

If you are not in a priority group but meet the criteria listed above, you can still apply for a home and may receive temporary housing (if no one from a priority group is waiting).

### Your income and assets

#### Income

To live in a City Housing home, you cannot earn over a certain amount of money.

The amounts shown below are after tax and before the accommodation supplement (if you receive one).

Effective from 1 October 2016:



CURRENT ELIGIBILITY

Family type	Weekly income	Annual income
1 adult	\$889	\$46,221
1 adult and 1 child	\$1,088	\$56,586
1 adult and 2 children	\$1,258	\$65,418
1 adult and 3 children	\$1,447	\$75,254
1 adult and 4 children	\$1,618	\$84,138
1 adult and 5 children	\$1,788	\$92,970
2 adults	\$946	\$49,182
2 adults requiring 2 bedrooms	\$1,088	\$56,586
2 adults and 1 child	\$1,145	\$59,547
2 adults and 2 children	\$1,315	\$68,379
2 adults and 3 children	\$1,499	\$77,951
2 adults and 4 children	\$1,675	\$87,100
2 adults and 5 children	\$1,845	\$95,932
3 adults	\$1,447	\$75,254

Assets

To be eligible for subsidised rent from City Housing, there is a limit to the amount of assets you can have.

Your age, as well as your assets, affects how much rent you have to pay.

For more information about rents and how much you have to pay, see: [Rent levels and bonds](#)

You are aged 50 years or younger

Your cash and investment assets are worth You pay this amount of rent

Under \$38,115	70% of market rent
\$38,115 and over	100% of market rent

You are aged over 50 years

Your cash and investment assets are worth You pay this amount of rent

Under \$54,450	70% of market rent
\$54,450 and over	100% of market rent

<b>City Housing Fairer Rents For Tenants Consultation</b>			Submission# 249
<b>Name</b>	<b>ON BEHALF OF:</b>	<b>ARE YOU</b>	<b>ORAL SUBMISSION:</b>
Patelesio Setefano	As an individual	A Council tenant	Yes
<p>1. We propose to set City Housing tenants' rent based on their income and circumstances. How strongly do you support this proposal? On a scale of 1 to 5 (1= Definitely Agree, 5=Definitely Disagree)</p> <p>1 Definitely Agree</p>			
<p>2. Thinking about your response to question one, what are your reasons for your level of support?</p> <p>Difficult to language hard to explain</p>			
<p>3. Do you have any comments on our proposal to set City Housing tenants' rent based on their income and circumstances?</p> <p>To be discussed 0276495064</p>			
<p>4. Do you have any comments about our draft Social Housing Policy?</p> <p>No comments entered</p>			