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XX February 2015 *via email:* [*CHP.regulations@mbie.govt.nz*](mailto:CHP.regulations@mbie.govt.nz)

Community Housing Regulatory Authority (CHP Consultation)

Construction and Housing Markets Branch

Ministry of Business, Innovation & Employment

PO Box 1473

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**Submission on “Eligibility and Registration of Community Housing Providers” consultation document**

Community Housing Aotearoa (CHA) welcomes the opportunity to provide comment on the Eligibility and Registration of Community Housing Providers consultation document.

Community Housing Aotearoa supports the proposed amendment to Regulation 6(1)(d) to remove the reference to “empowering document”. Several members have contacted us with concerns about the potential monetary and time costs they faced based on the overly prescriptive wording in the current Regulation. The proposed change will allow them to move from “deemed” provider status or be approved for new registration without incurring the expenses required to amend their empowering documents.

CHA acknowledges there is some risk of non-genuine providers applying to register, but believes the Community Housing Regulatory Authority (CHRA) has the required skills and experience to identify those applicants based on a review of the other documents submitted with applications. We have some concern that there is a need for CHRA’s authorising legislation to specify that only those organisations who are structured on a not-for-profit basis can be registered. Towards this end we have long supported an alignment between not-for-profit structures with the tax-exemption provisions, to ensure maximum outcomes are delivered from government’s housing investments. Such provisions would assist in growing the capacity of the sector, by demonstrating a stable policy environment to facilitate significant partnerships between community housing organisations and the for-profit construction and development industry. Such clarity would ensure that a registered community housing organisation’s role is clearly set and well understood by all parties.

While not currently being consulted upon, CHA asks CHRA to work with us and the wider sector on subsequent regulatory changes which include:

* Class 2 Registration;
* Alignment of Accreditation and Regulation; and
* Level Playing Field with HNZC and TLAs.

Given the time constraints related to existing deemed providers, we agree that these issues are best addressed through a separate consultation. We look forward to engaging with CHRA on this further consultation in the near future.

Community Housing Aotearoais the peak body for New Zealand’s community housing organisations with over 70 member organisations. It is an Incorporated Society, established in 2004 as the national umbrella group for New Zealand's community housing sector, showcasing its achievements and reinforcing its business and community models.

The New Zealand community housing sector includes a variety of organisational forms including Māori organisations, not-for-profit companies, charitable trusts and incorporated societies. Its members deliver a full continuum of housing, from the development and construction of new housing, the ownership and provision of affordable rental housing, to the facilitation of affordable home ownership options. The sector serves a diverse range of people with a diverse range of needs, including low and moderate income people, those who have particular health or social needs, people who have kinship relationships, and the elderly.

Please feel free to contact us with any queries regarding our submission.

Kind regards

Scott Figenshow

Director

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