

# Memo

8 October 2018

To: Councillor Penny Hulse – Chair, Environment and Community Committee  
All Environment and Community Committee members

cc: Sophie Heighway – Sustainability Initiatives Manager, Infrastructure and Environmental Services  
Claes Sandstrom – Senior Policy Advisor, Local Board Services

From: Tristan Coulson – Senior Local Board Advisor, Local Board Services

**Subject: Devonport-Takapuna Local Board feedback on the Ministry of Business, Innovation and Employment *Healthy Homes Standards* discussion document**

## Introduction

1. The purpose of this document is to provide feedback on the Ministry of Business, Innovation and Employment (MBIE) *Healthy Homes Standards* discussion document.
2. This feedback will form part of the council's overall submission and response to the discussion document.
3. The local board adopted this feedback at their 16 October 2018 business meeting.

## General feedback

4. The local board supports the overall purpose, intent and outcomes of the discussion document.
5. The local board supports all measures to address rental properties which have poor insulation, inadequate heating drainage and ventilation, moisture ingress or poor draught stopping.
6. The local board note that while their area has higher home ownership than the regional average, it still has pockets of communities and residents which are deemed 'at-risk groups'.
7. The local board suggest that mechanisms be consider to ensure the costs associated with the new standards are not off-set and incurred by the tenant.
8. Based on point seven, the local board suggest whether subsidies or other incentives can be provided to encourage landlords to meet the proposed standards.

## Feedback by section

### Section one: Heating

Question	Response	Rationale
Do you support option one or two for the location of heating devices that landlords must provide in rental homes?	Option two	The local board consider that option two is more likely to meet the objective of a warm, dry home than option one. Tenants with access to heating in bedrooms would especially benefit, particularly children and elderly and those with disabilities or illnesses that spend a large amount of time in the bedroom.  It should be noted that the all measures to stop draughts should be undertaken in the home prior to determining the appropriate heating device.

Question	Response	Rationale
Do you support option one or two above on whether landlords should provide heating devices that are capable of reaching 18°C or 20°C in room(s) covered by the heating standard?	Option one	The local board support the World Health Organisation (WHO) recommendation for indoor temperature of at least 18°C. As detailed in the previous section, healthy and dry homes are contingent of them having minimal draughts and heat is not lost.
Do you support option one or two for heating devices to be provided by a landlord in a rental home?	Option one	The local board consider that the efficiency and cost-effectiveness of the heating device in the property should be the primary factor, instead of indoor room temperature. Continued use of fixed and / or portable heating devices will result in significant electricity bills, and this cost is typically incurred by the tenant.  If additional heating devices are required to achieve the desired indoor room temperatures, then landlord should support tenants with their electricity bills.
Do you agree that a class of acceptable heating devices is created for those devices that are efficient, healthy and affordable for the heating standard?	Agree	This will ensure tenants enjoy a reduction in energy costs on their primary heating if replaced by more affordable to operate devices.
Do you agree that the heating devices listed above (unflued heaters, open fires etc) should be not acceptable for the heating standard?	Agree	The local board agrees that the listed devices are considered not acceptable for rental properties, as they are costly and unsafe options.
What other types of heating, if any, do you think should be acceptable or not acceptable in the heating standard? Why?	No comment	The local board consider the appropriate types of heating, and their respective issues have been considered in the discussion document.

### Section two: Insulation

Question	Response	Rationale
Which of the options (one, two or three) for the minimum level of insulation required do you support?	Option three	The local board support option three as it strikes a fair and reasonable balance to ensure rentals are suitably insulated, and costs incurred on landlord / property owners.
Do you agree that the exceptions set out in the 2016 regulations should continue under the proposed insulation standard?	Partially agree	The local board consider that statements such “reasonably practicable” require further definition and detail to ensure landlords fulfil their obligations to provide a suitably insulated property.
Do you support option one or two to assess a “reasonable condition” for insulation?	Option two	The local board support option two as it is more likely to meet the objective to make rental homes warm and dry than option one, by ensuring existing ceiling and underfloor insulation, as installed, is reasonably effective and that ceiling insulation has not compressed or settled significantly.

Question	Response	Rationale
Do you agree landlords should show compliance with the insulation standard by retaining particular records? If so, which records should be retained?	Yes	The local board consider that all records be submitted to MBIE to ensure compliancy.

### *Section three: Ventilation*

Question	Response	Rationale
Do you support option one, two or three to provide adequate ventilation in rental homes?	Option two	The local board considers that option two provides a fair and reasonable balance to ensure ventilation in rental properties while landlords will incur fewer capital costs.
Do you agree that exemptions should be available for certain rental homes from requiring openable windows?	Disagree	No exemptions for ventilation should be permitted.
Would any of the above proposed options for ventilation prevent future innovation and / or flexibility?	No	No further comment.

### *Section four: Moisture ingress and drainage*

Question	Response	Rationale
Do you support option one or two above to address the problems identified with moisture ingress and inadequate drainage in New Zealand rental homes?	Option two	The local board consider that reducing and eliminating ground moisture is one of the fundamental issues impacting health and dry rental properties.  Ground moisture has significant consequential impacts on flooring insulation and dampness in the property. Ensuring all landlords comply (with no exceptions) will address subfloor moisture, insufficient subfloor ventilation, inefficient drainage and leaks.
Do you think other requirements for moisture ingress and drainage should be included in the standard?	Yes	An annual monitoring and compliance check could be undertaken to ensure drainage is working effectively and minimising moisture-related issues.
Do you agree with the proposed exemptions? Do you think there are other homes that should also be exempt?	Disagree	The local board consider that option two should be an industry standard for all rental properties, with no exceptions.

### *Draught stopping*

Question	Response	Rationale
Do you support option one or two above to stop draughts and create warm and dry rental homes?	Option two	The local board consider that that is a relatively minor task for landlords to stop any unnecessary gaps or holes that cause noticeable draughts and a colder rental home.  The local board support this being support by guidelines to ensure consistency and overall improvements across the industry.

Question	Response	Rationale
Do you think other requirements for draught stopping should be included in the standard?	Yes	The local board consider that draught stopping is a 'quick and easy fix' and therefore so no reason why landlord cannot undertake these improvements within six months of the new regulations being approved.
Should the regulations specify any exceptions to this standard?	No	No further comment.

*Section six: Date to comply with the standards*

Question	Response	Rationale
Do you support option one, two or three above for the date that landlords need to comply with the standards for their rental homes?	Option two	The local board believe that a single date should be chosen and is applicable to all rental properties.
For option two, do you think 1 July 2022 is an appropriate date to allow landlords, industry and government with sufficient time to comply with the standards? If not, which date do you think would be appropriate, and why?	No	The local board believe that given the objectives of the standards is drier and heather rental properties, and improving the well-being of New Zealanders, then the commencement date should be as early as possible (e.g. 2021).