

Submission to Ministry of Housing and Urban Development

Healthy Homes Standards

Auckland Council, October 2018



Mihimihi

Ka mihi ake ai ki ngā maunga here kōrero,
ki ngā pari whakarongo tai,
ki ngā awa tuku kiri o ōna manawhenua,
ōna mana ā-iwi taketake mai, tauwi atu.
Tāmaki – makau a te rau, murau a te tini,
wenerau a te mano.
Kāhore tō rite i te ao.

*I greet the mountains, repository of all that
has been said of this place,
there I greet the cliffs that have heard the
ebb and flow of the tides of time,
and the rivers that cleansed the forebears
of all who came those born of this land
and the newcomers among us all.
Auckland – beloved of hundreds, famed
among the multitude, envy of thousands.
You are unique in the world.*

Title: Submission on the Healthy Homes Standards

Introduction

This submission is from Auckland Council and was approved by the Environment and Community Committee of the council on 16 October 2018.

Submissions are also attached from the following local boards of Auckland Council:

Note – local board submissions will be added once these are provided to staff.

Auckland Council would like the opportunity to speak to this submission.

Role of council

Auckland Council delivers a range of programmes to achieve healthy housing outcomes. These include:

- an eco-design advisor service which employs qualified home performance specialists to advise landlords, tenants and homeowners on creating warm, dry and energy efficient homes
- the Retrofit Your Home funding assistance programme which provides loans to homeowners for heating and insulation solutions
- local board projects such as Healthy Rentals, which provides advice to landlords and tenants, as well as developing and implementing a rental housing warrant of fitness
- a train the trainer programme, building capability and capacity among community organisations, health service providers and community housing groups
- a co-design process to establish a sustainable supply of housing-related interventions to create warm, dry, healthy homes for Auckland's Healthy Homes Initiatives through council's 'The Southern Initiative'
- development of energy efficient healthy homes through Panuku Development Auckland
- acting as a landlord through Panuku Development Auckland. In this role the council often upgrades properties that it has acquired for other purposes (e.g., for a future transport project) to a fit standard for tenants and then rents them until the land is required for construction.

Overall position

Auckland Council recognises that housing quality in New Zealand is generally poor, with 49 per cent of properties showing some visible mould. Rental properties are also in worse condition than owner-occupied properties: 44 per cent of rental properties and 25% of owner-occupied properties were rated as being of 'poor' quality in a recent BRANZ study.

Home ownership rates are decreasing in Auckland and the number of households in the rental sector is increasing. The 2013 census showed that since 2001 there have been significant drops in home ownership for Aucklanders aged in their thirties, forties and fifties.

Renting is becoming a long-term housing solution for many Aucklanders, and the number of lifelong renters is likely to increase.

Māori and Pacific peoples are particularly likely to rent and have the lowest levels of home ownership in Auckland at 40 percent and 32 percent respectively.

Because cold and damp homes are strongly associated with people experiencing health issues, including respiratory and cardiovascular conditions, improving the quality of rental housing is a priority for Auckland Council.

In line with our low carbon goals, higher indoor temperatures must be achieved in energy efficient and low emission ways. This will prevent such initiatives putting increased pressure on existing energy infrastructure and carbon emission targets.

Auckland Plan direction

The Auckland Plan 2050 calls for “bold action” on the area of housing quality, in particular for tenants. Key outcomes of the Auckland Plan that are aligned with these standards include:

- Improving the health and wellbeing for all Aucklanders
- Addressing disparities and serve communities in greatest need
- Advancing Māori wellbeing
- Moving to a housing system that ensures secure and affordable homes for all
- Improving the built quality of existing dwellings, particularly rental housing
- Encouraging all Aucklanders to make sustainable choices
- Reducing our greenhouse gas emissions by 40% by 2040
- Delivering a better standard of living for everyone.

Response to proposal

The council supports the Ministry of Housing and Urban Development’s intent to create standards for healthy homes because:

- It is aligned to the outcomes set out in the Auckland Plan 2050.
- The quality of houses in Auckland is poor and declining. Rental homes are twice as poor in quality as owner-occupied homes.
- To address inequalities and improve the health of our most vulnerable citizens, we need to set a high standard of quality for the increasing rental market

Response to consultation questions

The council recommends the following in response to the questions in the discussion document.

1. Heating

1.1 Where in the home should landlords be required to provide heating?

- *Option one: heating in living room only*
- *Option two: heating in living room and bedrooms*

Question: Do you support option one or two for the location of heating devices that landlords must provide in rental homes? Please explain your reason.

Response: Council recommends option two. Bedrooms are the coldest rooms in a home, have the longest usage period of any rooms in a dwelling and are primarily used by occupants for sleeping, which is when the human body is less active and prone to respiratory illness. It is also more likely that occupants will be in closer proximity to one another (e.g. sharing a bed or sleeping space) and are more likely to transmit airborne-based illnesses.

1.2 Online tool to determine adequate heating devices

Question: We propose to use the formula at Appendix 1 to determine the capacity required for heating devices for a room to achieve the appropriate indoor temperature.

We also propose that this formula will be used for a user-friendly online tool that will guide a landlord or tenant on the types of heating device that are capable of achieving the appropriate indoor temperature.

Response: Council recommends that the online tool should also consider energy efficiency and carbon emissions in making recommendations of appropriate appliances to achieving heating temperature targets. This is particularly important for properties with multiple rooms that, under the current calculation, would only require a plug-in heater capable of up to 2.4 kW of heating.

For example, it should be specified that if an electrical heating appliance is being used to achieve a heating output, and that more than three plug-in heaters would be required, that the heating system must have a COP of at least 3.0 in heating mode. This will drive the market to more efficient, low emission, centrally ducted heating systems (such as whole of house heat pumps).

Council also recommends that over time, a carbon emission target equal to the national grid should be applied to encourage the move from higher carbon emission-based energy sources (such as gas) to lower emission forms (such as electricity).

1.3 What achievable indoor temperature should heating devices be sized for?

- *Option one: Heaters must be capable of achieving an indoor temperature of at least 18 degrees*
- *Option two: Heaters must be capable of achieving an indoor temperature of at least 20 degrees*

Question: Do you support option one or two above on whether landlords should provide heating devices that are capable of reaching 18 degrees or 20 degrees in room(s) covered by the heating standard? Please explain.

Response: Council supports option two. The World Health Organization (WHO) recommends elderly, young and infirm persons need a higher indoor room temperature (20 degrees) than the recommended minimum 18 degrees in option one.

Environmental Health Indicators New Zealand cite research that suggests temperatures below 16 degrees increase the risk of respiratory infections, and below 12 degrees stress the cardiovascular system.

Setting the achievable indoor temperature to 20°C would result in higher indoor temperatures and reduce adverse health outcomes, particularly for people with illness or disabilities and older and younger people, who are disproportionately represented as tenants of rental properties.

Setting a higher indoor temperature of 20 degrees will more likely result in the use of larger, more efficient and lower emission types of heating appliances, but will increase costs for some landlords.

1.4 Should landlords only be required to provide heating devices where portable electric heaters are insufficient to achieve the required indoor temperature?

- *Option one: Landlords provide fixed heating devices only*
- *Option two: Landlords provide both fixed and portable heating devices*

Question: Do you support option one or two for heating devices to be provided by a landlord in a rental home?

Response: Council supports option two with the caveat below. Tenants are less able to afford the purchase of heating devices and may not purchase an appliance if it is their responsibility or choice to do so. Tenants are more likely to purchase inefficient or unsuitable appliances such as LPG portable heaters, as they are perceived to be cheaper to run. Use of these appliances can create fire risk, excess moisture and noxious fumes.

Option two would be more effective if appropriate appliances (for example panel heaters with digital/analogue thermostat and timer) were specified as part of the standard. For example, thermostat-controlled panel heaters would assist in gaining energy efficient outcomes while also reducing the energy spend made by the tenant to achieve healthy temperatures.

1.5 Should we accept some heating devices, and not others?

Question: 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? Please explain.

Response: Yes. Appropriate systems within this class should provide a cost-effective, adequate level of heating required which will be energy efficient and low carbon emitting.

Question: Do you agree that the heating devices listed above (unflued heaters, open fires etc) should be not acceptable for the heating standard? Please explain.

Response: Yes. Unflued gas heaters are expensive to run, produce high levels of water vapour and noxious fumes, have a high carbon emission profile and present a fire risk.

Question: What other types of heating, if any, do you think should be acceptable or not acceptable in the heating standard? Why?

Response: Heating appliances should only be sized once the property has met the insulation and draught proofing standards. This is to prevent over-sizing and excess energy use in a property that has not already improved the thermal envelope.

To meet desired energy efficiency and carbon emission outcomes, and where the bedroom heating requirement would exceed three plug-in heaters, a test should be applied by which the landlord be required to install energy efficient appliances for the whole of house.

Ducted heat pumps should be considered for all-of-house heating, as an energy efficient, low emission way to achieve heating targets while reducing energy use.

Panel heaters that have a built-in thermostat and timer, and possibly a fan, should be required for bedrooms under a certain size. Panel heaters are more likely to remain with the property during tenure change and can be easily identified and monitored as a part of a tenancy contract.

LPG heaters should be banned as a form of heating in New Zealand homes, given the risks and costs mentioned previously.

Night store heaters, commonly used in Europe, should be investigated as an alternative form of property heating. An advantage of this type of system is the ability to utilise off-peak electricity, reduce costs for the household and reduce peak pressure energy demand on the grid. This type of appliance would be suitable for the proposed time-of-use pricing structure to be introduced by Vector and use of a night/day electricity pricing tariff.

2. Insulation

2.1 What minimum level of insulation should be required in rental homes

- *Option one: Continue the status quo*
- *Option two: Landlords must replace or retrofit ceiling and underfloor insulation in their rental home if it is not in a reasonable condition (or better) and, when originally installed, did not have the R value of (at least): a) ceiling: 1.9 if located in zones 1 or 2 and 2.5 if located in zone 3 b) underfloor: 1.3.*
- *Option three: Landlords must replace, retrofit or 'top up' ceiling and underfloor insulation if it is not in reasonable condition (or better), is not in accordance with the relevant New Zealand Standard 80 and, when originally installed, did not have the R-value (at least) of: a) ceiling: 2.9 if the premises are located in zones 1 or 2 or 3.3 if the premises are located in zone 3 b) underfloor: 1.3*

Question: Which of the options (one, two or three) for the minimum level of insulation required do you support? Please explain.

Response: Council supports option three. Many New Zealand homes have substandard insulation. 51 per cent of rental properties have less than 100mm of ceiling insulation, and 25 per cent have 50mm or less. Insulation presents the most efficient way to reduce the energy required to reach target indoor temperatures. This solution is durable, low technology and low cost for ceiling and underfloor applications.

Insulating ceilings and underfloor are a cost-effective way of raising the overall insulation performance of a home compared with wall and glazing insulation, however wall and glazing options should be considered for future revisions to the standard.

Insulating to R2.9 in the ceiling and R1.3 underfloor, makes the rental standard consistent with the Building Code.

R2.9/1.3 presents a suitable standard that will provide increased energy savings over time and reduce tenant operating costs to heat a room to the same temperature compared to a lower standard.

There is a small additional cost for the material difference between option 2 and 3, but the labour cost is the same.

Given the cost and disruption of installing wall insulation, increasing the ceiling and underfloor standard presents a cheaper and less disruptive way to improve the overall thermal performance of the property.

In most cases, landlords who have insulated according to the Rental Tenancy Act in the last year will not be affected by this change to the standard.

Question: Do you agree that the exceptions set out in the 2016 regulations should continue under the proposed insulation standard (e.g. when it is not reasonably practicable to install insulation)? Please explain.

Response: Council does not agree. Many properties are currently exempt from proposed standards due to a lack of access. Access can often be achieved (such as making an access way in the ceiling or perimeter wall) for low cost, which should be made compulsory. Properties that cannot insulate the ceilings or subfloor should be required to insulate the walls to contribute to an overall equivalent increase in the level of thermal performance. There should be a requirement to meet insulation standards during any major alteration to the home, such as replacing walls or roof.

Question: Do you think any other requirements for insulation should be included in the standard and, if so, what? Would any of the above options inhibit future innovation and/or flexibility? If so, how?

Response: Yes. Curtains and secondary glazing both offer cost effective, long term solutions to improved thermal performance. Curtains should be lined and closed on three sides. Well installed, lined curtains offer a similar thermal performance to double glazing, for significantly less cost. The main challenge with curtains is their susceptibility to mould damage in moist environments.

Retrofit secondary glazing has reduced in price in recent years and offers long term, low tech, ongoing thermal benefits. Modern systems are comprised of acrylic sheets which are more robust and opaque than traditional glass.

2.2 How should the degradation of insulation under “reasonable condition” be assessed?

- *Option one: Status quo. Various criteria must be considered to determine whether any insulation is in a reasonable condition, including the extent of any dampness, damage, degradation or displacement. Ceiling insulation must not have excessively settled or compressed (defined as up to 30% of the insulation’s thickness).*
- *Option two: Insulation must meet the “reasonable condition” criteria described in option one above. However, for ceiling insulation, only a very minimal reduction in insulation thickness as a result of settlement or compression will be deemed acceptable in the assessment of reasonable condition.*

Question: Do you support option one or two to assess a “reasonable condition” for insulation? Please explain.

Response: Council supports option two. The height of the ceiling joist which can be easily inspected and judged by visual inspection is 90 mm.

Regardless of the thickness, inspectors will have a tolerance above and below the thickness of what they consider acceptable. So, if the minimum thickness is 70mm it is likely that some properties will have 60mm and judged suitable following an inspection. Raising the minimum to 90mm decreases the likelihood thicknesses are below 70mm while also allowing for further compression of insulation over time.

Ceiling insulation presents the most cost-effective way to insulate a home compared with wall insulation, curtains or glazing.

Question: Do you think any other criteria for interpreting “reasonable condition” of insulation should be included and, if so, what?

Response: No.

2.3 How can landlords show compliance with the insulation standard?

Question: Do you agree landlords should show compliance with the insulation standard by retaining particular records? If so, which records should be retained? Please explain.

Response: Yes. Landlords should be required to keep evidence of either the installation conditions or hold a valid inspection certificate. Inspection certificates should be able to be issued by qualified insulation installers, suppliers, manufacturers, and local government.

This information should be included in the tenancy agreement and also be listed on the property file under the Land Information Memorandum (LIM). Including this detail on the LIM will educate the market about what acceptable standards are and give potential buyers a more accurate assessment of the state of the property if it will be used as a rental.

3. Ventilation

3.1 What level of ventilation is required in rental homes?

- *Option one: (status quo) Under this option landlords must:*
 - *Ensure every bathroom has at least one window that directly opens to the outside air unless other adequate means of ventilation are provided to the satisfaction of the local authority.*
 - *Each habitable room must be constructed such that windows with an area amounting to not less than one twentieth part of the area of the floor of the room can be opened for the admission of air.*
 - *Every room which is not a habitable room shall be provided with such window or windows as the local authority may consider necessary for adequate ventilation.*
- *Option two: Provide openable windows and extractor fans in rooms with a bath or shower*
- *Option three: Provide openable windows and extractor fans in rooms with a bath, shower or indoor cooktop.*

Question: Do you support option one, two or three to provide adequate ventilation in rental homes? Please explain.

Response: Council supports option three. Bathrooms without mechanical extractor fans or heating are twice as likely to have moderate or worse patches of mould compared to those with extractors or heating. Kitchens without any mechanical ventilation are three times as likely to have visible mould compared to those with mechanical ventilation. Mechanical ventilation greatly assists in removing moisture when correctly specified, installed and operated. Systems should be ducted to the exterior and meet a minimum flow rate (50 litres per second for bathrooms).

It is recommended that the standard go further in reducing the likelihood for the extractor fan not being used due to tenant behaviour. For example, the extractor fan in the bathroom should be linked to the light switch or hot water pipe in the shower and run for a min of 15 mins after turned off. Mechanical extractor fans in bathrooms are rated less than 50W and do not use a lot of energy (less than a standard, incandescent light bulb).

Exemptions may be required for some building typologies, for example apartments with no opportunity for external ducting without incurring significant cost.

Question: What other forms of ventilation should be considered acceptable, or not included in the standard as acceptable? Please explain.

Response: Shower covers should be considered as acceptable as they provide an effective, low tech, durable solution to moisture management in the shower. This solution also requires less intervention from the tenant and there are no running costs.

Balanced ventilation systems that remove moisture should also be considered. These systems can provide mechanical extraction at a whole-of-house level, while retaining most of the energy for re-circulation into the indoor environment.

Window hinge limiters and trickle vents should be further investigated as both provide an effective way to ventilate the home, particularly bedrooms, while addressing tenant concerns around security.

A covered, outdoor clothes line should be provided where possible.

Question: Do you agree that exemptions should be available for certain rental homes from requiring openable windows?

Response: Yes.

Question: Would any of the above proposed options for ventilation prevent future innovation and / or flexibility? If yes, how?

Response: No.

4. Moisture ingress and drainage

4.1 How should landlords protect rental homes against moisture entering the home and inadequate drainage?

- *Option one: (status quo). Under this option, landlords are required to meet their existing legal obligations, including the Residential Tenancies Act and HI Regulations set out above.*
- *Option two: landlords install a ground moisture barrier if vents are not adequate and drainage must be efficient*

Question: Do you support option one or two above to address the problems identified with moisture ingress and inadequate drainage in New Zealand rental homes? Why/Why not?

Response: Council supports option two. Subfloor moisture entering the home is a major issue in many New Zealand homes, particularly if there is inadequate subfloor ventilation or ground moisture barrier. Ensuring adequate ventilation can be achieved is the cornerstone to a low humidity subfloor environment. Where this is inadequate or not possible, installing a ground moisture barrier is a low cost, low tech, durable solution that will provide reduced moisture ingress over time.

Question: Do you think other requirements for moisture ingress and drainage should be included in the standard? If so, what?

Response: No

Question: Do you agree with the proposed exemptions? Do you think there are other homes that should also be exempt?

Response: Council agrees.

Question: Would any of the above options inhibit future innovation and/or flexibility? How do you suggest this could be overcome?

Response: No

5. Draught stopping

5.1 What is the appropriate level of draught stopping to create warm and dry rental homes?

- *Option one (status quo): Currently, regulation 17 of the HI Regulations requires that the materials of which each house is constructed shall be sound, durable and where subject to the effects of the weather, weatherproof, and shall be maintained in such a condition. The walls and ceilings of every habitable room, bathroom, kitchen, kitchenette, hall and stairway shall be sheathed, plastered, rendered or otherwise treated and shall be maintained to the satisfaction of the local authority. Every floor shall be kept in a good state of repair free from crevices, holes and depressions.*
- *Option two: stop unnecessary gaps or holes that cause noticeable draughts. Option two requires the landlord to stop any unnecessary gaps or holes that cause noticeable draughts and a colder rental home, and:*
 - *are 3 millimetres or greater in and around windows and doors, walls, ceilings, floors and access hatches*
 - *block any decommissioned chimneys and fireplaces*

Question: Do you support option one or two above to stop draughts and create warm and dry rental homes? Why?

Response: Council supports option two. Stopping draughts is a low cost, low tech, durable solution that will reduce heat loss over many years.

Question: Do you think other requirements for draught stopping should be included in the standard? If so, what?

Response: No

Question: Would any of the above options inhibit future innovation and / or flexibility? If so, how?

Response: No

Question: Should the regulations specify any exceptions to this standard? If so, what?

Response: No

6. Date to comply with the standards

6.1 When and how should the healthy homes standards be implemented?

The Healthy Homes Guarantee Act allows for phased implementation of the healthy homes standards between 1 July 2019 and 30 June 2024.

- *Option one: comply at start of a new or renewed tenancy*
- *Option two: a single compliance date*
- *Option three: staggered compliance dates over five years*
 - *Sub-option A: compliance date set by healthy homes standards*
 - *Sub-option B: compliance dates set by location of the rental home*

Question: Do you support option one, two or three for the date that landlords need to comply with the standards for their rental homes? Why/why not?

Response: Council supports a mix of option one and three. Making changes to a property has the least impact on tenants when done as part of a change to tenancy occupation. It is also a good time to include these changes with other repairs and maintenance that may be required as part of a tenancy changeover. Having a single event when the property should meet the standards means that suppliers may only need to make one visit, reducing their costs for lead generation, sales and fulfilment of deliverables.

An end date is also recommended by which all properties must meet the standard, for example 2022.

A grace period of 90 days is adequate, given there will also be a notice period before this.

Question: For option one, do you think 1 July 2021 is the appropriate commencement date? Why / why not? Do you agree landlords should be given a grace period of 90 days between the start of a tenancy and when they need to comply?

Response: No, as per response above. Council agrees that a grace period of 90 days is adequate.

Question: 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?

Response: Yes.

Question: For option three, which approach do you think is an appropriate way to stagger implementation (by standard or location)? Do you have an alternative approach to staggering implementation that you think we should consider?

Response: Using a deprivation index would provide a way to ensure that those areas most in need received attention first, bringing forward the likely date that beneficial outcomes would take place.

Question: Is there a feasible compliance date option that has not been considered? Please explain

Response: Using the tenancy change date without waiting until July 2021 would stagger demand on suppliers.

Question: Do you agree with the assumptions and analysis in the document for the indicative costs and benefits, and our analysis of the advantages and disadvantages?

Response: Yes, council generally agrees with the assumptions and analysis, however the following areas warrant further investigation, or adjustment:

- a) shower covers as a valid alternative to mechanical extraction
- b) the potential impact on peak electricity loads, infrastructure and carbon emissions, of applying a heating standard, and how this might be mitigated.
- c) We would recommend that some interventions may require greater detail in specification to meet the intended objective, for example automated extractor fans based on user activity, and thermostat controllers on portable heating appliances.
- d) It would be useful to have an intervention hierarchy that reflects the desired outcomes of the Standards. For example, this could be done by assessing the impact on creating a warm, dry, healthy home against the cost and ease of implementing the intervention (eg draught stopping, insulation, ventilation, moisture ingress and drainage and then heating).

7. Implementation

7.1 When and how should the healthy homes standards be enforced?

Question: What records should a landlord retain to show compliance with each healthy home standard (e.g. R-value certification for the insulation standard)?

Response: Recording state of the house, including mould, should be required to prevent tenants being held responsible for entrenched mould in materials prior to their occupancy.

Question: What could be included on the tenancy agreement to show the landlord has complied with each healthy home standard (e.g. a description of the mechanical ventilation supplied in the kitchen and bathroom for the ventilation standard)?

Response: Council believes the following could be included:

- a. Insulation type, depth and R value
- b. Heating appliances
- c. Ventilation appliances
- d. Ground moisture barrier

Question: What are the most important considerations in developing a tool to help tenants understand and landlords to comply with the heating standard.

Response: Given the lack of data, greater information sharing across central and local government, and within local government, would improve the ability to address non-compliant properties.

Consideration should also be given to creating an easy-to-access and understand method of capturing and communicating information about the state of a property in relation to the standards.

Warrant of Fitness

Council supports the development of a rating (warrant of fitness) that would clearly communicate if a property meets the proposed standard. This could be similar to a vehicle warrant of fitness, which prospective car owners, sellers, insurers and other entities use to assess compliance to the standard.

The use of a national standard would set a clear expectation of what is required to meet the standard. Council would suggest a pass/fail system. The focus should be on monitoring the condition of the property, not the landlord or tenant.

The use of a rating system would also serve to educate the public about which housing features impact on creating warm, dry homes. This system could be either centrally or locally managed.

Enforcement

Auckland Council notes that the Ministry is also currently consulting on reforms to the Residential Tenancies Act which discuss broadening and increasing the powers of the Ministry to enforce various standards for landlords. Council has provided a separate submission on this reform.

We also note that proactive enforcement will be essential to achieve the desired outcomes of the healthy homes standards. A recent study examining poor rental housing quality suggested that legislation alone was not a sufficient driver and some landlords will need to be “managed into compliance” to achieve improved outcomes for tenants.

It is important to recognise that New Zealand has had existing legislation since 1947 (the Housing Improvement regulations) which is intended to encourage warm dry homes, but this has not achieved the desired outcomes as it has lacked effective enforcement.

We support strengthening the enforcement powers of central government to ensure that healthy homes standards are met by all landlords in a timely fashion. Creating a proactive enforcement system also moves the onus away from tenants to make complaints, which they are often reluctant to do since this can impact on their relationship with their landlord and their right to a secure tenure.

Education and incentivisation

Legislation and enforcement is just one tool and must be supported by education. Many landlords want to improve the quality of their asset but lack access to good, independent information.

Modifications which support a warmer, healthy home or help to mitigate climate change should be incentivised. At present, tenants are reluctant to make improvements they see as benefiting the landlord and may require permission. Landlords may also be unwilling to make the investment in upgrades.

Local government authorities can play a key role in education and incentivisation programmes. As outlined at the beginning of this submission, Auckland Council runs a range of programmes to incentivise behaviour change. We welcome the opportunity to work with the Ministry to utilise these as best practice guidelines for other councils. Auckland Council would also like to learn from others and adapt our programmes to ensure they are best practice and fit for purpose.

Conclusion and next steps

In summary, throughout these standards we have recommended that the highest options be chosen to improve the quality of rental homes in this country and the wellbeing of renters. Auckland Council is committed to its leadership role in Auckland, both as a local government authority and landlord, and will continue to work with central government and others to improve the lives of Aucklanders. We welcome discussion on our submission to achieve better outcomes for the local communities we serve.

Going forward, the council would like to remain involved in the development and implementation of standards for the Healthy Homes Guarantees Act. The proposed standards will not achieve their desired outcomes without effective enforcement and

education programmes. We request to be involved in discussions relating to education, implementation and enforcement of the standards.

DRAFT