

16th October 2018

Ōtara-Papatoetoe Local Board submission: Healthy Homes Standards

The Ōtara-Papatoetoe Local Board supports setting high standards for rental housing recognising that renting is a long-term housing solution for many in our community, including and especially residents that are vulnerable and/or from low socio-economic backgrounds.

1. HEATING

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

Support Option 2 – heating in living room and bedrooms

The consultation document states there is only a marginal lower net benefit to option 1 compared to option 2 based on the cost benefit analysis of an average household. A great deal of our residents in OPLB (46% Pacific, 16% Māori, 31% Asian, 21% European) are most likely to live in larger than average households, have the least room in a house and have poorer health outcomes. In addition to their being the longest usage period of any rooms in a home, bedrooms is where the human body is less active (when sleeping) and prone to respiratory illness. Therefore, having a warm house throughout would be most beneficial to households in our local board area.

1.2 Online tool to determine adequate heating devices

Support. We also recommend that the online tool consider energy efficient and carbon emissions in making recommendations of appropriate appliances to achieving heating temperature targets.

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

Support option 2. Heaters that landlords provide must be capable of achieving an indoor temperature of at least 20°C in rooms applicable to the heating standard. This will be most beneficial for at-risk tenants such as the elderly, children and the ill. Many of our residents will fall into this category.

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

Support option 2. Landlords must be encouraged to include fixed (eg panel heaters with digital/analogue thermostat and time) and portable, where suitable, heating devices to heat the required rooms. The objective is to ensure the heating standard being set can be achieved.

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

Yes. We support the list provided in the consultation document. Providing a warm dry rental home should not be at the expense of other outcomes, such as energy efficiency, health and safety.

2. INSULATION

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

Support option 3 - akin to “2008 Building Code”. As the consultation document states, this option will benefit a higher number of additional rental homes (80,000 – 190,000) compared to the other two options. Also, tenants will experience improved health (e.g. fewer deaths) and reduced costs from lower energy bills.

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

Support option 2. Insulation must meet reasonable conditions. Conditions relating to ceiling insulation are important because ceiling insulation presents the most cost-effective way to insulate a home compared with wall insulation.

2.3 How can landlords show compliance with the insulation standard? Do you agree landlord should show compliance with the insulation standard by retaining records? If so, which records should be retained.

Agree with the recommendation proposed in the consultation document, namely the following documents must be kept by landlords:

- the R-value when the insulation was installed
- a record of Building Code compliance and the level of insulation
- a suitably qualified and experienced assessor has certified compliance with the insulation standard.

3. VENTILATION

3.1 What level of ventilation is required in rental homes?

Support option 3. Having openable windows and extract fans in rooms with a bath, shower or indoor cooktop is more likely to achieve the objective of a warm and dry home because it addresses the need for ventilation compared to the other two options. As the consultation document states, there is a large body of evidence linking poor health outcomes, particularly respiratory diseases, to the presence of harmful moulds and mildews. This will lead to better health outcomes and less hospital admissions, which lessens the pressure on health spend.

4. MOISTURE INGRESS AND DRAINAGE

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

Support option 2. Landlords install a ground moisture barrier if vents are not adequate and drainage must be efficient. As stated in the consultation report, BRANZ research has found ground moisture barriers to be the most effective option at addressing subfloor moisture (more effective than subfloor vents). This option will achieve the goal of providing warm and dry homes.

5. DRAUGHT STOPPING

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

Support option 2. Stop unnecessary gaps or holes that cause noticeable draughts. This option will achieve the goal of providing warm and dry homes. As the consultation document states, this option will mean lower energy bills and tenants may enjoy better health and other positive social outcomes.

6. DATE TO COMPLY WITH THE STANDARDS

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

Support option 1 and 3. Our residents require warm and dry homes sooner than later. However, acknowledging the current issues with construction, compliance by landlords may not make it feasible. We support setting an end date by which all properties must meet the standard and the suggestion of 1st July 2022 is acceptable.

7. IMPLEMENTATION

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

Support online tools to help tenants understand and landlords to comply.

Support the development of a rating (warrant of fitness) that would clearly communicate if a property meets the proposed standard.

Support strong enforcement. Proactive encouragement is good, but once a deadline is set, we need to be equipped to ensure compliance if we are truly committed to providing warmer drier homes.