

Ministry of Housing and Urban Development's consultation on Healthy Homes Standards

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Ministry of Housing and Urban Development's (MHUD) consultation on Healthy Homes Standards.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH.

General Comments

4. The availability of healthy, affordable housing of people is a major concern for NMH. People who live in warmer drier homes tend to be healthier, with fewer GP and hospital visits and fewer days away from work due to illness. Tenure uncertainty, unaffordable housing related costs, dilapidation and cold damp conditions have all been found to adversely affect health. There is an increasing number of older people in rental accommodation. Poor housing exacerbates existing health conditions and heighten the impacts of impairment. This triggers dislocation from their communities, admission to an unnecessarily high level of care and support, and shift the cost of what is primarily a housing problem onto the health and social services sectors.¹
5. Badly ventilated and poorly heated homes reduce the occupants' comfort and can adversely affect health. An analysis conducted by the World Health Organisation found that those over 65 years of age showed increased respiratory problems when living in cold dwellings in winter and children 0 to 17 years of age showed twice the prevalence of respiratory problems in poorly heated homes.² Energy efficient homes result in reduced energy costs, which is important for low income households on fixed incomes, as well as helping meet the Government's sustainability objectives. The cost of electricity has risen 79% since 1990 and

¹ Saville-Smith, K. & Saville, J., (2012) *Getting Accessible Housing: Practical Approaches to Encourage Industry Take-up and Meeting Need*, Centre for Research, Evaluation and Social Assessment for the Office for Disability Issues and the Ministry of Business, Innovation and Employment

² Community and Public Health, (2013) *Fuel Poverty and Home Heating*, Canterbury District Health Board
<http://www.healthychristchurch.org.nz/media/16229/fuelpoverty.pdf>

New Zealand's residential prices have risen faster than most other OECD countries.³ The latest Electricity Price Review shows that 175,000 households spend more than 10% of their income on domestic energy (excluding housing costs) and that children are over represented in households experiencing energy hardship⁴. Whilst the report does not differentiate between owner occupied housing and rental properties, it can be assumed that those that live in the least energy efficient homes are more likely to be experiencing energy hardship and large proportion of these households would be rental properties.

6. NMH congratulates MHUD for initiating this review that will lift the standards of rental properties and will result in warmer, drier and healthier homes for families.
7. NMH also supports the other government initiatives that will improve rental conditions including the reform of the Residential Tenancies Act, associated Amendment Bills and the introduction of Winter Energy Payments.
8. NMH supports the overarching objective to establish minimum standards to allow New Zealand tenants to live in warm and dry rental homes.
9. However, while we strongly support the of improving housing standards, we would wish a holistic view to policy so that the costs of the improvement do not fall on those who are the most economically deprived (who are most likely the group whose health would benefit most from housing improvements) further reducing their disposable income and ability to purchase other goods which will improve their health (e.g. healthy food).

Specific Comments

10. *Location of Heating Devices*: NMH supports Option two that heating devices are required in the living rooms and bedrooms so that tenants have the ability to adequately heat their rooms which is especially important for infants, children and older adults who are at risk of winter mortality and respiratory-related disease.⁵ The effects of cold homes also increases illnesses such as colds and flu, mental health problems, and the exacerbation of existing conditions such as arthritis. Furthermore, by only placing heating devices in the living areas, people may choose

³ Ministry of Business, Innovation and Employment (2018) *Electricity Price Review* August 2018

<https://www.mbie.govt.nz/info-services/sectors-industries/energy/electricity-price-review/consultation/first-report.pdf>

⁴ Ibid

⁵ Community and Public Health, (2013) *Housing, home heating and air quality: a public health perspective*, Canterbury District Health Board <https://www.cph.co.nz/wp-content/uploads/housingheatingairpherspective.pdf>

to sleep in their living areas which could lead to crowding and the spread of infectious diseases. Many bedrooms are located on the southern side of houses which means that they received very little sun especially in winter. NMH advocates for the having heating devices in both living rooms and bedrooms because this would be meet with the objectives of the Standards enabling tenants to live in warmer drier homes.

11. *Achievable indoor temperature for heating devices:* The consultation document offers two options: either 18°C or 20°C. NMH would like to offer a third option that heating devices that are in the living areas are capable of heating to 20°C and heating devices in bedrooms are capable of heating to 18°C. Often bedrooms are used only as a place to sleep, therefore it is more appropriate to raise the ambient temperature of the room to 18°C before sleeping. This lessens the cost burden on landlords who would only need to provide smaller fixed heaters that are capable of heating to 18°C rather than bigger more expensive ones.

12. *Whether landlords should provide fixed or portable heating devices:* NMH advocates for heating devices that are fixed such as a heating device in the main living areas and smaller fixed panel heaters in the bedrooms. This would meet the objectives of a warm, dry home and provide those tenants who are unable to afford their own portable plug-in heater with a source of heating.

It is essential that any heating appliances meet the appropriate electrical standards to prevent any fire risks.

13. *Should we accept some heating devices and not others?* NMH agrees that the standard should not include unhealthy, inefficient or unaffordable forms of heating. In particular NMH does not endorse the following devices:

- a. *Unflued Heaters:* These devices should not be used because of the risk to human health due to the high levels of moisture and harmful combustion products which are produced by these appliances and the associated significant reduction in the quality of the indoor environment.⁶
- b. *Open Fires:* Open fires do not adequately convert energy to heat and much of the heat generated is lost up the chimney which subsequently

⁶ Community and Public Health, (2015) *Position statement and background paper for the Canterbury District Health Board*, retrieved from <https://www.cdhb.health.nz/About-CDHB/corporate-publications/Documents/CDHB%20Unflued%20Gas%20Heaters%20PositionStatement.pdf>

adds to air pollution, and air pollution itself is a major cause of ill health.^{7,8}

- 14. Insulation Standard:* NMH advocates for Option 3 that ensures the minimum “R” levels of both existing and new insulation is akin to the 2008 Building Code. Bolstering insulation levels of houses makes homes warmer and drier and reduces power bills which lowers the rates of energy poverty. In addition, as acknowledged in the consultation document, tenants are able to have lower energy bills as well as improved health benefits. Less energy will also be useful in efforts to mitigate climate change.
15. NMH also advocates that the insulation only be able to settle/degrade up to 10% before it is an unreasonable condition so that tenants can experience greater health benefits and lower heating bills.
16. For insulation to be the most effective, it must be installed without any gaps. In the assessing whether insulation is in reasonable condition, there must be a criterion assessing the absence of gaps.
17. It is important that there is a mechanism that landlords can be held accountable to these Standards. NMH recommends that Tenancy Services have teams of assessors to ensure that landlords are complying with the Standards.
18. In addition, NMH recommends that the Standards also include the provision of curtains. Well-installed curtains and blinds can help to reduce heat loss through windows, provided they are installed without gaps that allow air movement between the window and the room.⁹
19. Whilst curtains are relatively inexpensive, some landlords or tenants may require additional support from the likes of curtain banks. Curtain banks are only available in some places in the country. NMH advocates for the extension of curtain bank services nationally including into the Nelson Marlborough region.
- 20. Ventilation standards:* NMH supports Option three of openable windows and extractor fans in rooms with a bath, shower or indoor cooktop as these measures would be the best way to reduce moisture levels in kitchens and bathrooms which

⁷ Ministry for the Environment (2005) *Warm Homes Technical Report: Detailed Study of Heating Options in New Zealand* Retrieved from <https://www.mfe.govt.nz/sites/default/files/media/Air/warm-homes--heating-options-phase1.pdf>

⁸ [http://www.who.int/en/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](http://www.who.int/en/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)

⁹ <https://www.energywise.govt.nz/at-home/windows/curtains-and-blinds/>

will result in drier, less mouldy rental homes and therefore be less likely to experience poor health outcomes.

21. It is important that extractor fans are properly sized to ensure that they are working as effectively as possible.¹⁰
22. Tenants also need to be made aware of their responsibilities to keep properties dry and free from mould. Advocacy work and education by Tenancy Services is essential to increase public awareness, including dispelling myths such as using bathroom heat extractors is costly, where the cost of having mouldy bathrooms is actually higher for residents. Information needs to be given in a range of different formats (websites, pamphlets, social media) to cater for the diverse needs of people.
23. *Moisture ingress and drainage standard:* NMH supports Option two in regards to landlords need to provide for the efficient guttering and downpipes on the property. NMH agrees in principle to the properties having efficient drainage, drains and ensuring that the subfloor has a ground moisture barrier. However in principal, this may be difficult to achieve because of the topography of the property or lack of existing pipe infrastructure. In the first instance, landlords where possible, should provide a ground moisture barrier, and then be able to access either free local tenancies services or local council services to assess whether it is possible to improve drainage on the section.
24. *Draught stopping standard:* NMH supports Option two that makes it mandatory for landlords to stop any unnecessary gaps or holes that cause noticeable draughts and a colder rental home. These simplified standards would make it easier to landlords to understand, and as a result homes would become less draughty and making it easier for tenants to heat. Education may be required by Tenancy Services to ensure that drainage and ventilation openings are not mistakenly blocked.
25. *Dates to comply with the Standards:* NMH advocates for Option two of a single compliance date because this would give landlords a set date to meet their obligations.
26. *Enforcement of standards:* NMH advocates for a large public awareness campaign to be launched that educates landlords and tenants of the new standards, and the expected responsibilities for both parties.

¹⁰ <https://www.energywise.govt.nz/at-home/ventilation/ventilation-checklist/>

27. A vital element of this is the provision of independent support for both tenants and landlords through Tenancy Services where tenants and landlords can receive advice about the Standards so that small issues can be quickly addressed. Additional resourcing could be provided at a local level for a range of mediation and dispute resolution services, and to the tenancy compliance and investigations teams to ensure that matters are resolved quickly rather than matters being escalated through to the Tenancy Tribunal.

Additional comments

28. NMH advocates for an extension of the Standards to include additional safety elements to reduce the risk of accidents for tenants. These safety elements¹¹ should include:

- a. Whether a property has an adequate hot water supply, and the water is heated to 55°C
- b. There are secure/high level cupboards to store hazardous/toxic substances
- c. Windows have effective latches
- d. Doors lock securely
- e. Windows above ground level have security stays to prevent falls
- f. Glass doors have safety visibility strips
- g. There is adequate outdoor lighting
- h. There is adequate fencing
- i. Decks and Balconies meet current building code

29. Achieving healthy warm homes will result in better health outcomes, however some landlords may consider that it is costly for them to bring their homes up to the proposed Standards. Consideration should be given to providing financial incentives to landlords to enable them to meet the Standards. This would lift the level of housing stock at a greater rate.

¹¹ http://www.healthyhousing.org.nz/wp-content/uploads/2018/07/WOF_Assessment_Criteria_and_Methodology_Version-3.pdf

Conclusion

30. NMH supports the introduction of Healthy Home Standards and recommends that they be extended to include safety elements. Improving housing standards will improve health outcomes for tenants. In addition, outlining expectations for landlords and tenants in terms of health and safety and increasing the advisory and the compliance capacity of Tenancy Services would help alleviate some of the tensions that may occur between landlord and tenants.

31. NMH thanks the Ministry of Housing and Urban Development for the opportunity to comment on the Healthy Homes Standards.

Yours sincerely



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