



**Consultation - Healthy Homes Standards
Ministry of Housing and Urban Development**

The Salvation Army New Zealand, Fiji, Tonga and Samoa Territory Submission

BACKGROUND

1. The Salvation Army is an international Christian church and social services organisation that has worked in New Zealand for over one hundred and thirty years. The Army provides a wide-range of practical social, community and faith-based services, particularly for those who are suffering, facing injustice or those who have been forgotten and marginalised by mainstream society. We are passionately committed to our communities as we aim to fulfil our mission of caring for people, transforming lives and reforming society through God in Christ by the Holy Spirit's power.¹
2. We have over 90 Community Ministry centres and Churches (Corps) across the nation, serving local families and communities. Many of our social services have direct or indirect with housing and the rental market. These include our Salvation Army Social Housing (SASH), our Transitional Housing contracts with Ministry of Social Development, and our foodbanks and financial mentors that often work with people in housing crisis and/or living in a rental situation.
3. This submission has been prepared by the Social Policy and Parliamentary Unit of The Salvation Army. This Unit works towards the eradication of poverty by encouraging policies and practices that strengthen the social framework of New Zealand. This submission has also been informed by other parts of The Salvation Army, particularly SASH. This submission has been approved by Commissioner Andrew Westrupp, Territorial Commander of The Salvation Army's New Zealand Fiji Tonga and Samoa Territory.
4. The Salvation Army is committed to every New Zealander having a healthy, dry and safe home. A healthy, dry and safe home is vitally important for health outcomes. Combatting respiratory diseases, rheumatic fever and skin infections are all associated with substandard housing, overcrowding and homelessness. Allowing families and individuals access to healthy housing allows for better health outcomes and therefore better education, work outcomes and productivity.

RESPONSES TO QUESTIONS FROM MHUD

HEATING:

1. **Where in the home should landlords be required to provide heating?**
 - We **support** heating in both the **living room** and **bedrooms**. This is due to bedrooms being occupied for a significant amount of an occupant's time. Ensuring that there is

¹ <http://www.salvationarmy.org.nz/our-community/mission/>

sufficient heating in these rooms ensures that they are warm, dryer and that the occupant is healthier and less likely to become sick. This is a reasonable expectation for landlords who rent property as a business.

- 2. Indoor temperature: What achievable indoor temperature should heating devices be sized for?**
 - Heating devices should be sized to ensure that **20 degrees Celsius** can be reached. This is particularly important for elderly and sick tenants. This capacity ensures that the housing has sufficient heating, which provides a warm enough temperature.
- 3. Should landlords only be required to provide heating devices where portable electric heaters are insufficient to achieve the required indoor temperature?**
 - Option one, fixed heating devices, such as heat pumps are usually more efficient and cost effective in the long run. Alongside this, safety is a major concern for portable heating devices; we need to ensure that tenants have a safe and reliable heating source.
- 4. Should we accept some heating devices, and not others?**
 - **Yes.** Ensuring that heating devices are safe, efficient and heat the room to a sufficient temperature is vital. We agree with MBIE as to which devices should be excluded. It is important to make this distinction in legislation and policy.
- 5. 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.**
 - **Yes,** ensuring that heating standards are maintained throughout this process is vital to the reviews effectiveness. How a room is heated is just as vital as to it being heated.
- 6. Do you agree that the heating devices listed above (unfuelled heaters, open fires etc.) should be not acceptable for the heating standard? Please explain.**
 - **Yes,** we need to have heating which is efficient, healthy and affordable. Ensuring that the heating is all of these things will ensure that tenants are more likely to heat their homes and use the heating provided.
- 7. What other types of heating, if any, do you think should be acceptable or not acceptable in the heating standard? Why?**
 - **N/A** – the heating specified by MBIE outlines the heating which should be acceptable and not acceptable. The Salvation Army agrees with this.

INSULATION:

- 1. What minimum level of insulation should be required in rental homes?**
 - Option 3, insulation must be effective for the geographical area in which the house is placed. This will ensure cost effectiveness for landlords and that normal building code standards are vitally important for businesses to adhere to such as landlords.

2. Do you think any other requirements for insulation should be included in the standard and, if so, what?

- When people are registering new rentals, double-glazing should be required to be installed by the landlord/owner.

We believe that the exceptions set out in the 2016 regulations should continue.

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

No.

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

- Option 2, It should be a requirement for landlords, at regular intervals between 5-10 years, to have an independent report on the quality of their insulation.

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

- Yes, there every 5-10 years a landlord should have to provide a report/evidence that their insulation meets the standard.

VENTILATION:

1. What level of ventilation is required in rental homes?

- Option 3, this is the minimum and reasonable expectation to ensure that moisture is minimised. The extractor fan for cooktops is particularly important. The extractor fan in bathrooms should be separate to that of the light. The exception to windows being able to open is when this would mean there was a significant safety hazard.

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

- Option 2, this option is essential to ensure that houses are kept warm and dry and do not have the possibility of mould developing as a result of inadequate drainage.

DRAUGHT STOPPING:

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

- Option 2, ensures that there is immediate action where gaps or holes develop in homes.

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

- No.

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

- No.

4. Should the regulations specify any exceptions to this standard? If so, what?

- Yes, when a certified building expert states the house meets all reasonable draught stopping.

COMPLIANCE DATE:

1. When and how should the healthy homes standards be implemented? The HHG Act allows for phased implementation of the healthy homes standards¹⁴⁰ between 1 July 2019 and 30 June 2024.

- Option 2, this ensures that landlords are given reasonable time to comply and tenants have equal and fair treatment throughout the country. However, we believe a better answer to this situation would be landlords having to comply within a certain date as in option 2 or at the start date of a new tenancy. We support the date of July 2021; this is a reasonable date for both landlords and considering the urgency of tenants' health and wellbeing.

2. 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?

- No, this would disrupt the tenant and interfere with their daily life.

3. Is there a feasible compliance date option that has not been considered? Please explain

- We draw attention to our suggestion to the option above, outlining a compliance date, but landlord would be required to meet the standard with a change in tenancy before that date.

ENFORCING THE STANDARDS:

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

- Landlords should be required to submit tri-annually that their home meets the standard; they should identify and show all of their work undertaken since their last certification. Landlords would then be issued a three year certificate of compliance. The certificate of compliance would be subject to random inspections, occurring after a 24 hour notice to the landlord and tenant. The tenancy tribunal could also issue a demand for inspection of the certificate of compliance.

2. 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)?

- Included on the tenancy agreement would be the date of the last certificate and an assurance that it remains current during the tenancy period. A tenancy would only remain valid until the date of the expiry of the current certificate. At any time a landlord can apply for 3 year certificate.

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

- Clarity, simple English, options for non-English speakers to understand requirements.
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