# Timaru District Council Submission on Healthy Homes Standards Discussion Document

13 October 2018

# To Ministry of Business, Innovation & Employment

#### Introduction

- 1. The Timaru District Council welcomes the opportunity to comment on the options for the five proposed healthy home standards for rental homes.
- 2. This feedback is provided by the Timaru District Council, 2 King George Place, Timaru. The contact person is Mark Low, Corporate Planning Manager. I can be contacted at Timaru District Council, phone (03) 687 7200 or PO Box 522, Timaru 7940.
- 3. The Timaru District Council is a local authority in the South Island serving over 46,000 people in South Canterbury. The main settlement is Timaru, with other smaller settlements of Geraldine, Pleasant Point and Temuka. The Council is made up of a Mayor and nine Councillors serving three wards. Three Community Boards also exist in the District.

# **Timaru District Council's Social Housing**

- 4. Timaru District Council owns and manages 236 social housing units that provide quality but affordable housing, to compliment the central government rental housing available in the district.
- 5. The Council provided rental units are either one bedroom or bedsit units. There is no provision for family housing. Units are part of a communal property, with between 6 18 units on any one site. Access ways and outside space are not fully fenced or private for individual units.
- 6. The social housing activity is self funding, without any rates input. Rentals are set at a level that enables the necessary maintenance and improvements to be undertaken. Rental increases are kept at a modest level typically \$5-\$10 per annum to enable these improvements to be carried out.
- 7. All social housing tenancies are open ended.

# **Comments on proposed standards**

## 8. Heating

Location of Heating Device

Page 14 Discussion Document

Support Option One (status quo) for the location of heating devices, ie living room only (includes kitchen and dining room if open plan rental home). Our rental units are small enough that the heat pump will heat the whole area.

Indoor Temperature Heating Devices Should be Sized For

Page 16 – Discussion Document

Support Option One – Heaters must be capable of achieving an indoor temperature of at least 18°C. This keeps our small rental units at a comfortable heat and, if used, will keep the flats/bedsits (our stock is all one bedroom or bedsit) warm and dry.

Heating Devices Landlords Should Provide

Page 18 – Discussion Document

Support Option One – providing fixed heating devices where portable devices are insufficient to heat the required rooms. As mentioned above, all our social housing stock is either one bedroom or bedsit and heat pumps are sufficient to heat the kitchen/living/bedroom. Our bathrooms also have wall heaters.

It is noted that small portable devices are difficult to keep track off, and may become an issue when tenancies change.

Acceptance of Some Heating Devices and Not Others

Page 20 – Discussion Document

Agree that under the heating standard a class of acceptable heating devices be created for those devices that are efficient, healthy, and affordable. However, we have found that tenants will not turn on any heating device if they don't think they can afford it (i.e. several of our tenants have worried about the electricity bill a heat pump will generate). The efficient heating device then becomes inefficient because it is then switched on and off for short periods. It is important that the heating subsidy is continued for those on lower incomes.

# 9. Insulation

Minimum Level of Insulation Required

Page 24 – Discussion Document

Support Option Two. We have completed this where it has been achievable. A number of our properties have skillion roofs and/or concrete floors that restrict insulation options.

#### 10. Ventilation

Level of Ventilation Required

Page 37 – Discussion Document

Support Option Two – openable windows and extractor fans in bathrooms. We have been working towards this as a matter of course. Security latches should also be considered to address tenants perceived or actual concerns over safety.

We don't support Option Three as not all tenants cook. There is also the added question of cleaning an extractor fan in the kitchen. We are very aware that not all of our tenants would be inclined to, or in some cases, be capable of, cleaning an extractor fan. If fans are installed in the bathroom, they should be hooked up to the light switch to ensure they are used and then switched off when not required. Tenants must also be responsible for opening the bathroom window daily to reduce the likelihood of mould appearing.

We would prefer that there is five years at least to install the required ventilation. With our social housing units needing to be self funding, we must balance improvements with trying to keep our rents affordable and can only do this if expenditure is spread over several years.

# 11. Moisture Ingress and Drainage

How Should Landlords Protect Against Moisture Ingress and Drainage

Page 42 – Discussion Document

Support Option Two – landlords to provide efficient drainage and guttering, downpipes and drains, and ensure that the subfloor has a ground moisture barrier, unless there is already subfloor ventilation – but only in cases where there is accessibility to put them in place (in some of our flats the gaps are too small for anyone to get under the floors). We have, where possible, put barriers down and we have dealt with leaks immediately as tenants make us aware of them. We regularly clear gutters, downpipes, and drains.

# 12. Draught Stopping

Appropriate Level of Draft stopping

Page 45 – Discussion Document

We have been working with Option One (status quo) and towards Option Two so support both/either of the options.

#### 13. Compliance Dates

Page 51 – Discussion Document

Support Option Three – staggered compliance dates over five years with Sub-Option A – compliance date set by healthy homes standards. This is the most practical option in terms of balancing costs with maintaining affordable self-funding multi-complex social housing. Our suggestion is to implement insulation first, followed by heat and then ventilation. Without insulation any heating devices would not work efficiently and if ventilation was required prior to heat the homes would be very cold.