

Canterbury

District Health Board

Te Poari Hauora o Waitaha

Submission on Draft Housing Policy

To: Christchurch City Council
PO Box 73013

Submitter: Canterbury District Health Board

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Proposal: The draft Housing Policy's overall aim is for all people in our city to have access to adequate housing that is secure, safe, affordable, warm and dry.

SUBMISSION ON DRAFT HOUSING POLICY

Details of submitter

1. Canterbury District Health Board (CDHB).
2. The submitter is responsible for promoting the reduction of adverse environmental effects on the health of people and communities and to improve, promote and protect their health pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956. These statutory obligations are the responsibility of the Ministry of Health and, in the Canterbury District, are carried out under contract by Community and Public Health under Crown funding agreements on behalf of the Canterbury District Health Board.
3. The Ministry of Health requires the submitter to reduce potential health risks by such means as submissions to ensure the public health significance of potential adverse effects are adequately considered during policy development.

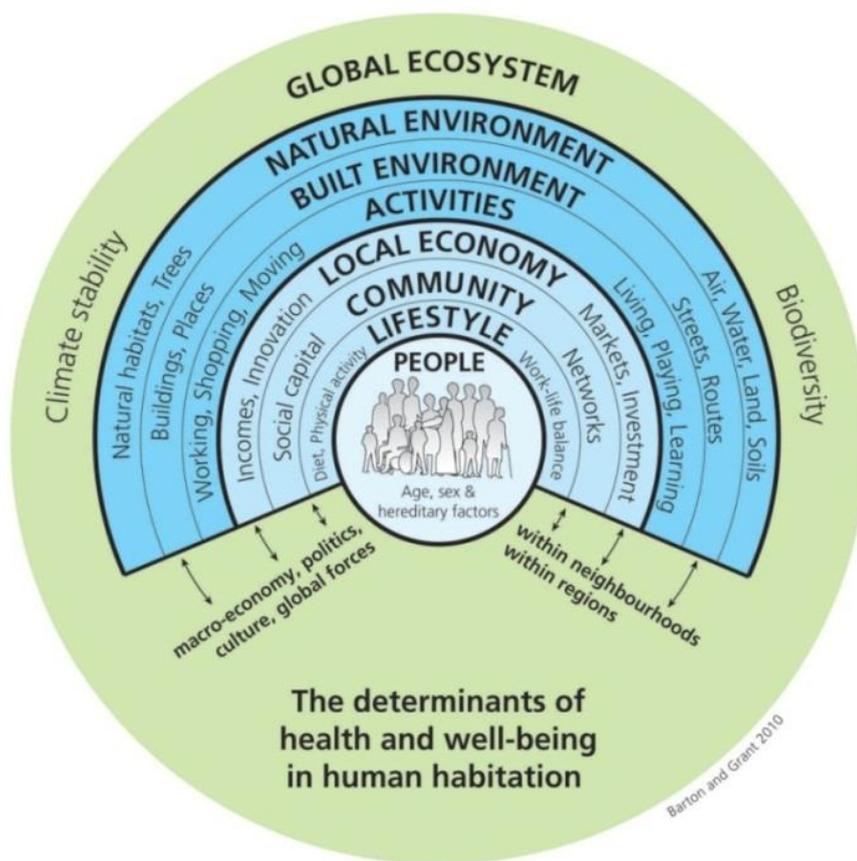
Details of submission

4. The CDHB welcomes the opportunity to comment on the Draft Housing Policy. The future health of our populations is not just reliant on hospitals, but on a responsive environment where all sectors work collaboratively.
5. While health care services are an important determinant of health, health is also influenced by a wide range of factors beyond the health sector. Health care services manage disease and trauma and are an important determinant of health outcomes. However health creation and wellbeing (overall quality of life) is influenced by a wide range of factors beyond the health sector.
6. These influences can be described as the conditions in which people are born, grow, live, work and age, and are impacted by environmental, social and behavioural factors. They are often referred to as the social determinants of health¹. The diagram² below shows how the various influences on health are complex and interlinked.

¹ Public Health Advisory Committee. (2004). *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee: Wellington.

² Barton, H. & Grant, M. (2006) A health map for the local human habitat. *The Journal of the Royal Society for the Promotion of Health*. 126 (6), pp 252-253. <http://www.bne.uwe.ac.uk/who/healthmap/default.asp>

7. The most effective way to maximise people’s wellbeing is to take these factors into account as early as possible during decision making and strategy development. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government if they are to have a reasonable impact³.



³ McGinnis J.M., Williams-Russo P., & Knickman J.R. (2002). The case for more active policy attention to health promotion. *Health Affairs*, 21(2): 78 - 93.

General Comments

8. The CDHB supports the proposal and has a number of recommendations for consideration which would further improve health outcomes for the community.

Specific comments

9. In response to **Question 1** in the consultation document, the CDHB strongly agrees with the vision, principles and goals of the Draft Housing Policy.

Policy Scope

The CDHB notes that this draft policy covers all types of housing including social housing and market housing. It is positive to see that Council is considering the wider affordability considerations of housing related energy and transport costs. However, it is noted that that Schedule One does not contain any specific actions relating to these costs. Domestic energy costs for Cantabrians are known to result in a significant number of low income households experiencing fuel poverty, which contributes to poor physical and mental health outcomes. Approximately 28,000, or 22% of households in Christchurch, are living in fuel poverty and half of these are rented homes.⁴ The Council could consider further support of energy efficient heating programmes. In relation to transport costs, it is noted that the new District Plan Objectives (14.1.1.2) include provisions for medium density zones within 800 metres of bus routes. It would be useful for the Draft Housing Policy to make reference to this and other related initiatives.

Policy Principles

The CDHB supports the breadth of the Principles and agrees that security of housing tenure is of paramount importance. Secure housing provides household stability, a sense of belonging and enables access to schools and community facilities and opportunities for relationships with neighbours.

⁴ Wilton, E. (2014). Assessing the impact of prohibiting wood burner use on fuel poverty levels in Christchurch. <http://www.ecan.govt.nz/publications/Plans/hia-report-appendix4.pdf>

Policy Goals

The CDHB agrees with the proposed goals for the Policy but notes that in terms of Housing Quality, there is one action relating to rental properties given in Schedule One but no actions relating to the broader housing market. The CDHB regularly sees the illness and disability outcomes of poor quality and inadequately heated and ventilated housing, as well as injuries sustained in the home linked to structural issues. A recent joint project between the CDHB and Community Energy Action on such housing resulted in a powerful difference in health outcomes following improved insulation, ventilation and heating. There was a 29% reduction in hospital bed nights which equates to \$900,000 savings to the CDHB within the first 12 months.

Although the problems with large volumes of energy inefficient, chronically damp unsafe housing stock is a national issue, territorial authorities have a statutory role to address local housing quality as part of the environmental protection role. Last year the Auckland City Council evaluated conditions of boarding houses in South Auckland and found numerous breaches of the Health Act 1956, the Building Act 2004, the Housing Improvement Regulations 1947 and the Resource Management Act 1991. Their methods and findings could help inform local approaches.

Housing quality is critical, therefore the CDHB recommends that the goals for both Housing Quality and Acute Needs are given a higher priority.

In order to better address housing quality, an intersectoral approach will be needed. There is scope for expansion of the housing focus of the Environmental Health Officers' work on dangerous and insanitary housing stock, especially in the sizeable Christchurch private rental sector, which is calculated by the Ministry of Business Innovation and Employment (MBIE) to be 39,000 properties.⁵ This would build positively on the joint response to insanitary housing that Health Protection Officers at Community and Public Health and Environmental Health Officers at Council have undertaken since 2015.

⁵ Ministry of Business, Innovation and Employment. (2013). *Housing pressures in Christchurch: A summary of the evidence*. Wellington, New Zealand. <http://www.mbie.govt.nz/publications-research/research/housing-and-property/christchurch-housing-report.pdf>

10. In response to **Question 2** in the consultation document, the CDHB strongly agrees with the commitments and deliverables outlined in the Proposed Actions in the Draft Housing Policy.

Needs Analysis

The CDHB encourages Council to do a needs assessment as an urgent project. It is very difficult to be clear about which actions will be successful until a full needs assessment is undertaken. Ideally this would be done alongside neighbouring Territorial Authorities as the populations between districts are fluid in terms of both living and working.

Demand Analysis, Building Knowledge

The CDHB would be interested in working with the Council in this area, including applying Health Impact Assessment processes to housing policy. The expert team of public health analysts at Community and Public Health could be utilised to add valuable health analysis into the mix.

Mixed Housing, Inclusive Housing

The CDHB supports the commitment and the deliverables of this proposed action but would like to see more detail around the type of support that the Council is offering in terms of a range of ownership models. Also it would be useful to know what type of housing outcomes that the council is assessing.

A Range of Responses, Acute Needs

While the CDHB supports the general directions outlined, the commitments and deliverables for this goal do not seem to match the urgency of the goal. The CDHB recommends that urgent work be done with local agencies to clarify current systems, pathways and financing mechanisms for the effective provision of housing and associated support services to eliminate homelessness. The CDHB recommends that acute needs should encompass the considerable health risks of homelessness, and dangerous and insanitary housing.

Retaining Affordable Housing, Housing Quality

The CDHB supports the high priority commitment to promote the use of standards and performance based approaches to improve and maintain rental stock quality. Achievable targets and actions that address identified housing issues and opportunities, for example through the use of a rental housing Warrant of Fitness, need to include the overall quality of Christchurch's housing including private rental stock as a high priority. This commitment needs clear deliverables to accompany it.

The CDHB recommends that the definition of affordable housing be more inclusive of true housing related living costs. For example, if someone can buy an 'affordable home' using the 30% definition but has to live a long way from work or education, then the total affordability of the home is greatly reduced due to factors such as transport costs and travel times for work and leisure. This in turn may affect mental health and stress.

The CDHB strongly supports the task of 'encouraging the adaption of dwellings to meet the needs of more diverse household types' and recommends that this be given a higher level of priority. Canterbury's population is ageing and the dwellings that are built now need to be able to function effectively for older residents now and into the future. Incorporation of Universal Design principles into new housing developments should be encouraged, to ensure they are accessible for people of all ages and abilities. Options should be explored with Māori, Pacifica and Asian communities, as well as older people and multi-generational families to clarify needs and expectations.

The CDHB suggests the commitment to 'education and advocacy on a range of housing issues' is raised to a high priority. Efforts should be made to work in tandem with the Department of Building and Housing at MBIE, to reach and persuade more private sector landlords of older housing stock to engage with the Build Back Smarter Service, and/or Community Energy Action domestic insulation subsidies, and to reiterate tenant's rights and pathways to resolution of housing quality issues through the Tenancy Tribunal.

11. In response to **Question 3** in the consultation document, how much work Council should be doing in the areas of social, affordable and market housing is set out in the table below;

	A lot less	A bit less	The same	A bit more	A lot more	Don't know
Social Housing						
Emergency					✓	
Rental					✓	
Affordable Housing						
Rental					✓	
Ownership						✓
Market Housing						
Rental					✓	
Ownership						✓

Other Comments

12. The CDHB and Council enjoy a positive collaborative relationship through the Joint Work Plan, which includes a number of housing goals and actions. The Joint Work Plan provides an established framework for a more joined up approach to consultation, planning and delivery in the interests of good housing. In addition to this, there is potential to better follow through on the enforcement of repair work orders issued against rental property owners through collaboration with other agencies such as the Tenancy Tribunal and the Compliance Team of the Department of Building and Housing at MBIE.

13. It is important that the Council undertakes to strengthen its pathways/systems with other organisations in order to assist the public and community organisations to meet their housing challenges. The Build Back Smarter Service is an excellent example of a new post-earthquake pathway. It operates from a resident-centred perspective through the stages of awareness raising, decision-making, funding, finding tradespeople and ensuring a quality job. Other examples include, Repair Well, The Curtain Bank, and the Health Pathways referral system of the CDHB.

Conclusion

14. The CDHB does wish to be heard in support of this submission.

15. Thank you for the opportunity to submit on Draft Housing Policy.

Person making the submission



Evon Currie

Date: 3/08/2016

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