



27 March 2015

Wellington City Council
101 Wakefield Street
Wellington 6011

Re: Submission on Social Housing Service Policy

Thank you for the opportunity to provide a written submission on this consultation document.

Regional Public Health serves the greater Wellington region, through its three district health boards (DHBs): Capital and Coast, Hutt Valley and Wairarapa and as a service is part of the Hutt Valley District Health Board.

We work with our community to make it a healthier safer place to live. We promote good health, prevent disease, and improve the quality of life for our population, with a particular focus on children, Māori and working with primary care organisations. Our staff includes a range of occupations such as: medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts.

Regional Public Health acknowledges the importance of the social housing operated by Wellington City Council (Council). We congratulate Council on its work in collaboration with central government to improve the condition of the housing stock through the on-going upgrade programme. We also see there is a necessity for Council to work with the private, social, and community housing sector, and health and social support agencies, to ensure the housing needs of the most vulnerable are met.

We also endorse Te Mahana: Wellington's Homelessness Strategy and are a partner agency to support the implementation of the strategy. This five yearly housing policy review is an important opportunity to ensure Council housing policy supports the successful implementation of Te Mahana.

We are happy to provide further advice or clarification on any of the points raised in our written submission. The contact point for this submission is:

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Kind regards

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Question 1: Who should we house?

The Council provides social rental housing to high needs tenants, seniors and low income households. Other housing providers also provide housing to these or similar groups. Who do you think the Council should house and do you think there are any gaps in social housing provision in Wellington?

Wellington is fortunate to have two large social housing providers City Housing, HNZC, and several smaller and niche community housing providers operating in the city. Despite this, the new supply of social housing has not increased to meet the predicted needⁱ and the demand for social housing exceeds supply. Social housing remains a scarce resource in Wellingtonⁱⁱ.

RPH strongly recommends that until the supply of social housing better meets demand, Council's role remains focused on housing households on low incomes e.g. those households relying on a government benefit, low wages or a low fixed income, particularly those households where children or persons with additional health needs are present.

As shown by example in the Council's policy review discussion document, housing costs for these groups take up a high proportion of the household income, leaving less money for essential items for maintaining health, for example food, heating and medical expenses.

RPH recommends that, in addition to the low income criteria, Council also prioritise housing for the following groups. These groups may face disadvantages in the private rental sector due to discrimination, poor standards and insecure tenureⁱⁱⁱ; in turn, these disadvantages impact negatively on their ability to secure housing convenient to employment, support services and community resources^{iv}.

- Maori, Pacific and other ethnic minorities
- Refugees newly settling in Wellington
- People leaving prison
- Single income families
- Older people
- People living with a disability or poor mental health
- People with poorer health outcomes and higher rates of avoidable hospitalisation for housing related conditions^v (e.g. rheumatic fever, skin infections, respiratory illness).

Question 2: What barriers to renting in the private market should we consider?

The people who apply for Council housing cannot afford their rent in the private market, often face discrimination or cannot find suitable housing in the rental market. Are there any other major barriers and housing issues that we should consider when people apply for housing?

RPH recommends Council consider the importance of the security of tenure that social housing offers and the potential to improve health and social outcomes for those that apply for housing.

Rent increases and the sale of rental properties provide limited security of tenure in the private rental market. Insecure tenure impedes access to:

- consistent and coordinated health, disability and social services supports
- early childhood, school and college education
- public health nurses in schools and the free community dental service.

Children and young people

RPH recommends Council prioritise applications from single income families in the central suburbs and areas where rents are increasing.

The rise in rents in popular suburbs (Newtown, Miramar, Strathmore, Berhampore) add further financial and social stressors and families are cutting back on essentials further, or incur debt to cover the basic costs of living. Others move to less expensive and poorer quality homes or 'double up' with another family, increasing the risk of crowding and housing related illness (e.g. increased risk of rheumatic fever, infectious diseases, and respiratory illness^{vi}). Crowding also increases the risk of domestic violence, child abuse and poorer school attendance and performance.

Families on a low income living in the private rental sector move house more frequently and have worse health and social outcomes than those living in the social housing sector^{vii}. Public health nurses in schools and other health professionals visiting homes report the undue hardship experienced by families in the private sector to cover the basic cost of rent, heating, food and health care. Similarly, hardship is caused when families move house to cheaper suburbs but pay the additional travel cost to maintain consistent access to childcare, education, school health and social services, and community networks^{viii}.

Homelessness

RPH recommends people living in emergency or temporary accommodation are prioritised when applying for Council accommodation.

RPH is concerned about people living in emergency and temporary accommodation. The living situations include poor quality boarding houses, sharing with friends and family^{ix} where people are vulnerable to immediate eviction following disputes and behaviour which related to the person's health and disability issues or not coping through ageing^x

Te Mahana Wellingtons Homelessness Strategy

RPH recommends Council align the outcome of this policy review with Te Mahana and works with health, social, and community housing partners to provide housing for vulnerable groups living in emergency and temporary accommodation.

RPH endorses Te Mahana, Wellington's Homelessness Strategy. We have committed a public health advisor with expertise in homelessness to work on Te Mahana in 2015-2016. Work will include better aligning health sector planning and activity with the goals of Te Mahana, and improving the coordination of work between health, housing and social support services for those with high needs leaving secondary service care.

Disability and housing modifications

RPH recommends the individual needs of people on a low income and living with a disability are considered when people apply for social housing.

Security of tenure allows people with a disability or a child with disability to modify a house and install specialist equipment required to maintain as an independent life as possible. The availability of homes in the private rental sector for people on low incomes that have suitable access and allow modification of the home and storage of needed equipment is limited. It is also difficult to move

services and coordinate care for people when they move between neighbourhoods as housing costs make it unaffordable to stay.

Question 3: Should we consider providing rental accommodation to key groups?

Many housing providers around the world provide housing for key workers so that they can afford to live in locations near to where they work. This includes groups such as hospital, police and education staff, some student groups and others. What groups would you see as requiring rental accommodation in Wellington City and under what conditions?

Key workers to support

RPH supports the Council in providing housing for key workers where workers earn minimum or low wage, or who are on zero contract hours and have little financial security.

RPH recommends these are workers that provide essential support services, for example cleaning, catering, and administrative staff, bus drivers, classroom support teachers, and health care assistants.

Students

RPH recommends Council accept applications from students from groups who experience discrimination in the private rental sector, including young people (18 to 25 year olds) and adult learners from Maori, Pacific, and refugee households, or people that have additional health and disability issues.

RPH recommends Council work in the long term with the universities, technical colleges and wananga to plan how they intend to support development of an adequate supply of student accommodation in the city. This will help to reduce pressure on the demand in the rental market where there is competing demand for the supply of permanent housing for people on low incomes and accommodation for students.

Professional groups

RPH does not recommend Council provide housing for qualified teachers, nurses or medical staff, and police. These professional groups are financially more able to find housing in the private market, or to seek the alternative solutions offered by community housing providers in the city. For example shared equity housing schemes where people are supported to move into home ownership.

RPH only supports housing of professional groups in circumstances where they meet the criteria (60% of median Wellington's income) for accessing social housing due to poor health or disability that prevents full time employment, or they care for a family member with poor health or disability.

Question 4: How should we set the eligibility criteria?

How do you think we should set the eligibility criteria (for example, levels of income and assets) for people to access Council housing?

Income level

RPH recommends Council keep the level of income criteria to 60% of the median income.

Social housing is a scarce resource that needs to be reserved for households on the lowest incomes. We suggest Council work with other social housing providers in Wellington to plan which groups they will provide for and where there may be shared responsibility for social housing supply.

Cash asset

RPH recommends Council reduce the cash asset to \$5,000

RPH recommends Council focus on housing people on the lowest incomes and higher levels of need. The cash asset level is too high to meet the financial criteria and we recommend it is reduced in line with this focus. Over the next five years Council need to monitor any impact this has on the people housed or the organisations allocation of housing.

RPH recommends Council work with other social housing providers to set up alternative options for people with larger cash assets.

For example share equity and other home ownership schemes, or alternative housing models for people on slightly higher incomes in their retirement years, including the retirement village association for people over the age of 65, and over the age of 55 for Māori and Pacific. Housing providers in the retirement village sector have expressed an interest in finding affordable models of housing for those on low incomes who are currently priced out of their services^{xi}.

Question 5: How could we structure our rent discount to reflect different tenants' situations?

The Council currently has only one rental setting offering affordable rent at 70 percent of market rent. However, we house a wide range of tenants. Some groups of tenants require different services because of their personal circumstances or stages in life and some could afford to pay more rent as they are on higher incomes. In what ways could our rental settings accommodate different tenant groups so they get services tailored to their needs and income levels?

RPH recommends Council works in partnership with community housing providers (CHPs) to open up access to the Income Related Rent Subsidies for current Council tenants with the highest need. People that currently receive the Council subsidy and the accommodation supplement and still pay more than 25% of their household income on rent e.g. people on single incomes living in severe hardship.

Question 6: How could we support tenants to move on?

What relationships could we develop to help tenants find appropriate housing when they shift out of their Council unit? Some tenants are no longer able to live independently, some require a bigger or more accessible home, and some no longer wish to live in a high-density environment. Some may want to buy their own home. How could we assist tenants in these circumstances, and is it appropriate to? Who should fund these services?

RPH recommends Council work with tenants to create immediate, medium and where possible long term housing plans to create security of tenure and stability.

RPH recommends Council works more with community housing providers (CHPs) and health sector funders and providers to create more flexible models of housing provision that do not necessarily require people to move, and enabling Council tenants to access Income Related Rent Subsidies. For some, the life long provision of social housing is appropriate and models of support where the person is able to remain in a property are required.

- Explore the provision of additional specialised support for people living in Council owned properties.
- Better meet the changing support and housing needs of individual households e.g. increase in income, family growth, or ageing etc.

RPH recommends Council partner with CHPs to explore options for providing support for tenants whose income goes above 60% of the median. For example providing assistance to secure a house in the same or near by suburb in the social rental sector to be able to maintain consistent access to primary care, education, and supportive networks. Alternatively, to provide options for households who would like to move towards buying a house through a shared equity scheme in a nearby suburb.

RPH recommends Council engage with the aged care sector about shared housing for older people with low incomes, as the sector has expressed an interest in entering this part of the housing market.

Question 7: How could we make it easier to access housing?

Currently the Council and the Ministry of Social Development have different eligibility criteria and separate waiting lists and application processes for people applying for housing. How could this and our other processes be streamlined and improved to make it easier for tenants to access housing appropriate for their needs?

RPH has endorsed Te Mahana the Wellington Strategy to End Homelessness. The plan includes the goal of streamlining the housing application, assessment and allocations process for people who are homeless. Learning could be taken from this process and applied to social housing generally.

RPH recommends Council work with the Ministry of Social Development and other community housing providers (CHPs) to develop a Wellington system for assessing the housing needs and allocating accommodation.

RPH will be working with the health sector over the next five years to look at how to improve the quality and usefulness of the housing data collected by health agencies. The aim is to be better able to identify housing need and to respond with appropriate housing or support service options.

RPH recommends Council share waiting list data and review the data it collects to help build a more reliable picture of housing need in Wellington. Information includes local waiting lists, New Zealand Census Statistics on housing deprivation, and local level service administrative data.

Question 8: Do you have any other suggestions?

RPH recommends Council engage at a strategic and executive level to better coordinate activity between parties entering the social housing space as the central governments housing reform programme is implemented, including iwi, community housing providers, Community Housing Aotearoa, Ministry of Social Development, the Department of Corrections and Capital & Coast District Health Board^{xii}

RPH strongly recommends Council work with partners to lead the co-creation of a local social housing strategy to coordinate the collaborative work required between sectors to meet the housing needs of priority groups in Wellington^{xiii}. The work area fits with Outcome 1 of the Te Mahana framework: *A diverse range of affordable and appropriate accommodation, tenancy and home based support is available for people to access and maintain tenancies*^{xiv}.

References

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