

Toi Te Ora Public Health

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Submission to draft Dangerous and Insanitary Buildings Policy

The Bay of Plenty District Health Board (Bay of Plenty DHB) is required by the Public Health and Disability Act 2000 to improve, promote, and protect the health of people and communities, to promote the inclusion and participation in society and independence of people with disabilities and to reduce health disparities by improving health outcomes for Māori and other population groups.

This submission has been prepared by Toi Te Ora Public Health (Toi Te Ora) which is the Public Health Unit for Bay of Plenty DHB. The key role of Toi Te Ora is to promote, protect and improve population health, prevent ill health and minimise the risk of disease and injury through population based interventions.

In a similar way that local authorities have responsibilities to assure conditions in which people can be healthy, designated officers within Toi Te Ora have responsibilities to reduce conditions within the local community which are likely to cause disease. In part, this is undertaken by assisting Councils with their responsibilities pursuant to the Building Act and the Health Act.

Bay of Plenty DHB makes this submission for these reasons and welcomes the opportunity to assist Council to protect and promote public health by safeguarding the community from environmental and infectious disease threats.

This is an important policy for public health because health and wellbeing are directly linked to the condition of any building which people occupy, particularly household units. Housing is a significant determinant of health. Good quality housing is essential for physical and mental health. It is therefore important that this policy achieves the desired outcome and meets relevant principles of section 4 of the Building Act.

Dr Phil Shoemack, Medical Officer of Health, submitted to the previous policy in 2011 suggesting changes to make the policy more effective at safeguarding health. The DHB recognises that most of the alterations to the draft policy have been required by changes to legislation. However, the DHB is also pleased to see Council intends to take a more proactive approach to identifying and managing dangerous and insanitary buildings rather than its previous approach of responding to complaints.

The concept of a healthy household unit (a home) brings together three key aspects: the physical conditions of the house, the suitability of the house for its occupants, and the affordability of the house. The following discussion focuses on the physical condition and suitability of the building for its occupants.

Poor quality homes can impact on health in many ways. Houses in poor repair increase the risk of injury. Cold, damp, and mouldy homes are associated with illnesses such as asthma and respiratory infections. Cold indoor temperatures increase the risk of acute cardiovascular events. When hazardous substances are present in a home the health of its inhabitants can be affected in both the short and long term. Household crowding increases the risk of infectious disease transmission. Dangerous and insanitary housing, which includes crowding, can affect mental health.

Section 4 of the Building Act recognises the role that household units play in the lives of the people who use them and the importance of preventing any harmful effects on human health. Building owners are responsible for ensuring their buildings are safe and healthy, principle 4.4 of the Council policy reflects this. This will also provide consistency with the Council's approach in policy 7.3.

It is recommended that principle 4.4 recognises that building owners have a responsibility to ensure their buildings are safe and healthy.

Bay of Plenty DHB is supportive of Council inspecting and assessing information, or a complaint, regarding possible dangerous or insanitary buildings in policy 6 and 7.

A decline in housing availability in Tauranga is resulting in individuals and families seeking alternative housing solutions such as garages, basements, sheds and sleep outs. This situation increases the likelihood of people living in dangerous and/or insanitary conditions. Bearing in mind that good quality housing is a significant determinant of health the DHB would like to see Council take both reactive and proactive approaches to managing dangerous and insanitary buildings. A proactive approach to identifying buildings, particularly household units that may harm health or life, is consistent with Building Act principles and the proactive public health duties of local authorities under the Health Act 1956. That is, every local authority has a duty to improve, promote and protect public health and inspect its district regularly for nuisances or any conditions likely to harm health. The DHB strongly recommends that the policy includes a proactive and planned approach to identify dangerous and insanitary buildings to improve the state of housing throughout the city.

Council's approach to insanitary buildings discussed in section 7.1 includes liaison with Bay of Plenty DHB in relation to infirm or neglected persons. The DHB recommends that Council should liaise with the Medical Officer of Health in this regard as identified in Section 126 of the Health Act.

The DHB notes section 7.2 and supports the inclusion of Council's legislative ability to rectify situations when building owners may not. The DHB also supports the inclusion of the reference to the Health Act 1956 as relevant legislation.

Council's priorities under the Building Act outlined in policy 9.1 are supported. However, the DHB would like to see policy 9.2 amended. The potential risk to human life (death) is obviously important when prioritising work on buildings. However, the potential risk of harm to health also needs to be included when prioritising work on buildings. Therefore the DHB recommends policy 9.2 (1) be amended to include the potential risk of harm to human health.

Further information in support of this submission may be found in Bay of Plenty DHB's Housing and Health Position Statement which may be viewed on the DHB website. https://www.bopdhb.govt.nz/media/60903/20171011_bop_housing-and-health.pdf

Toi Te Ora Public Health, on behalf of Bay of Plenty DHB wishes to be heard in support of this submission.

Kind regards

A handwritten signature in black ink that reads "Sally Webb."

SALLY WEBB

Board Chair

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