

16 August 2026

Social Services and Community Committee
Parliament Buildings
WELLINGTON

Via email: ssc@parliament.govt.nz

Tēnā koe

DUNEDIN CITY COUNCIL SUBMISSION ON THE RESIDENTIAL TENANCIES (REGISTRATION OF BOARDING HOUSE LANDLORDS) AMENDMENT BILL

1. Thank you for the opportunity to submit on the Residential Tenancies (Registration of Boarding House Landlords) Amendment Bill (the Bill).
2. Overall, the Dunedin City Council (DCC) supports the intent of the amendments in the Bill.

The Ōtepoti Dunedin Context

3. The DCC is aware of approximately 11 boarding houses currently in Dunedin city. The DCC supports the implementation of a register which will give local authorities access to a more accurate record of boarding houses in their areas.
4. The DCC's Housing team works with other organisations, including central government agencies such as Fire and Emergency NZ, the Ministry of Business, Innovation and Employment (MBIE), and the Ministry for Social Development to share any information about any buildings of concern.
5. The DCC currently interacts with boarding houses as part of its business-as-usual activities. Some boarding houses have a Building Warrant of Fitness (BWOFF) which the Building Services team audits as required. The Environmental Health team may be involved if there are any health or noise concerns.
6. If a building is deemed dangerous or insanitary, the DCC may intervene in alignment with its Dangerous and Insanitary Buildings Policy. The DCC's community-focused teams will work with landlords to assist any displaced residents if needed.

The DCC Submission

7. In its regulatory and compliance role as a territorial local authority, the DCC seeks assurance that amendments in the Bill will:
 - clearly define the role and expectations of territorial authorities and/or MBIE
 - ensure that any additional responsibilities placed on territorial authorities and/or MBIE are accompanied by appropriate statutory powers and resourcing
 - provide effective mechanisms for inter-agency information sharing
 - provide adequate oversight, vulnerable individuals may continue to be housed in accommodation that is unsafe, unhealthy, or otherwise unsuitable
 - establish a clear response pathway where enforcement action may displace vulnerable residents
 - ensure that information about boarding house properties is clear and useful without creating an incorrect assumption that registration constitutes certification of compliance by the relevant territorial authority and/or MBIE.
8. The DCC supports the implementation of a register which assists targeted enforcement by enabling councils and/or MBIE to focus resources on unregistered or non-compliant properties.
9. The DCC supports the provision of information that assists relevant agencies to understand whether a property is subject to BWOF requirements or other relevant statutory requirements which could support more effective coordination across agencies.
10. The DCC notes that boarding houses provide an important source of accommodation for people who may have limited housing choices.
11. The DCC supports improved standards and accountability but recommends that, as part of the implementation of any amendments, provisions should be in place to monitor any unintended impacts on the supply of lower-cost accommodation, and that appropriate support and transitions arrangements are in place where necessary for vulnerable residents.

Conclusion

12. The DCC thanks you again for the opportunity to make this submission, and for the invitation to speak at hearings on the Residential Tenancies (Registration of Boarding House Landlords) Amendment Bill.

Ngā mihi

A handwritten signature in black ink, appearing to read 'Sandy Graham'.

**SANDY GRAHAM
CHIEF EXECUTIVE OFFICER
DUNEDIN CITY COUNCIL**