

USING GENRE TO UNDERSTAND HEALTHY HOUSING PROVISIONS

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ABSTRACT—*Healthy housing provisions promise to ensure housing quality and thereby improve residents' health outcomes. Following the proliferation of such policies across numerous national contexts, this article uses theories of genre to understand healthy housing provisions as a particular textual class, with recognizable formal features and common requirements of social actors for their implementation. The tools of genre studies are appropriated to support policy development and comparative analyses of healthy housing policies, with attention paid to the production of generic components in relation to particular contexts. This article takes established healthy homes standards in New Zealand and ongoing efforts in New Orleans, Louisiana, to establish a healthy housing register as case studies. The case studies both exemplify how theories of genre can elucidate features of housing policy and represent the political, institutional, and technical work required to develop and administer effective healthy housing provisions.*

KEY WORDS—genre, housing quality, minimum standards, healthy housing, renters' rights, New Orleans, New Zealand

Introduction

In 2018 the World Health Organization (WHO) released its *Housing and Health Guidelines*. This significant publication describes practical recommendations to reduce the health risks of substandard housing, relating to injury hazards, crowding, the thermal environment, accessibility, and so on. In specific contexts, however, the challenge remains to integrate

health concerns into local laws and policies governing housing construction, tenancy, and maintenance.

Recent years have demonstrated a widespread cultural investment in minimum housing standards as a strategy to improve resident health outcomes. For example, in Australia, state and territory reviews have considered legislated minimum standards for ensuring rental housing quality, with increasingly detailed requirements written into regulations.¹ This follows a longer period of international reform, via healthy housing provisions with varying degrees of legislative power, alongside the development of various housing quality assessment tools (see NCHH, 2013; EU, 2010; Bierre & Howden Chapman, 2020). In the UK, the *Homes (Fitness for Human Habitation) Act 2018* came into force in 2019, increasing rental tenants' powers to take landlords to court if a dwelling is 'not reasonably suitable for occupation in that condition', in relation to damp and mould growth, natural lighting, ventilation, and many other factors (Bevan, 2019; Thompson & Defoe, 2020). The essential role of housing to good health is also cited in the Alberta Government's *Minimum Housing and Health Standards*, passed in 1999 and revised in 2012, which specify minimum standards for the housing premises, equipment and furnishings, and sanitation (cleanliness and pest infestation) (Alberta Health, 2012). In these and many other jurisdictions, policy attention is underpinned by the expansion of the residential rental sector, and the related mainstreaming of a renters' rights discourse, alongside increasing recognition of connections between housing and health outcomes (see WHO, 2021; Choice *et al.*, 2018). Typically integrated into state-based residential tenancy acts or regulations, healthy housing provisions do not dismantle the unequal power relation through which a tenant might request necessary maintenance, nor do they increase housing supply, preclude retaliatory evictions, or address homelessness (Harrison, 2004). However, advocates view the chief advantage of such

provisions as relatively detailed specification of required housing hardware, beyond existing protections regarding safety, habitability, and cleanliness.

This article uses theories of genre to examine healthy housing provisions and their promise for securing housing of adequate quality for tenants. I employ cultural studies approaches to genre to frame such policies as reproducing the conventions of a textual class in which they are recognizable, while engendering particular understandings of housing failure and forms of desirable government action. Framing healthy housing provisions as a particular policy *type* encourages analysis of its identifiable and replicable features, in turn supporting prospective policy development and facilitating comparisons between policies in different contexts. The potential for comparative analysis is not (necessarily) to evaluate particular policies, but instead to understand how an instance of a generic policy type must incorporate local concerns, styles, interests, and requirements. This framing emphasizes that both the formal content and social context of healthy housing provisions impact on whether the introduction of this instrument will meaningfully support improvements in housing quality, or not.

In the sections that follow, the first considers healthy housing provisions as a policy genre aiming to improve housing-related health outcomes. Framing healthy housing provisions as a genre is useful for understanding various features of housing policy—including authorship and intent, semantic and syntactic content, audience, and truth effects—which impact on policy success. It also highlights healthy housing provisions as an attempt to establish some stability to housing’s dynamism, beyond the temporally narrow impact of building codes that regulate construction, as a backstop against the entropic tendency of housing and the requirement for ongoing maintenance and repair (Graham & Thrift, 2007). There are

numerous alternative mechanisms that policy-makers might employ to improve rental housing quality, such as providing tax credits to landlords who conduct improvements, or low-interest loans for abatement (see Liu *et al.*, 2019). However, where alternative measures are often enacted at the discretion of individual property owners, healthy housing provisions typically apply to all rental housing. This ‘universal’ application underpins the appeal of such policy, but also ensures the interest of competing stakeholders.

The methods section that follows outlines key questions to ask of specific healthy housing provisions. Informed by ethnographic fieldwork in contexts where such policies have both been developed but not instituted, and where healthy housing provisions do not exist but offer regulatory potential, these questions are sufficiently abstract to elicit relevant contextual details that require consideration in prospective policy design. To put this another way, while the policy artefact—the regulation listing minimum standards and directions for their application—may be relatively generic, its efficacy within a particular policy ecology depends on myriad factors relating to former and existing standards, governing authorities, maintenance and inspection regimes, tenant advocacy networks, and so on. These factors should be considered in policy advocacy and design (Fischer, 2003).

These questions inform the two case studies that follow: a succinct consideration of New Zealand’s (NZ) ‘Healthy Homes Standards’ and a longer examination of New Orleans, Louisiana, where an attempt to establish minimum housing standards and a rental register has been pursued since 2015. The purpose of these case studies is not to evaluate one policy against the other, or even to offer sustained direct comparison, given how different these housing contexts are. Instead, New Zealand’s achievement in legislating healthy homes standards offers an archetype for considering key features of this policy genre. However, the

danger of case study analysis is the rendering of any passed law or policy as complete or ‘successful’, against the reality of ongoing reform, revision, disavowal, perversion, implementation, and (de)funding. To undermine the tendencies of case study analysis toward narrative closure and an evaluative mode, the article grants greater space to the in-process status of New Orleans’ policy, highlighting the dynamic and open-ended character of policy, like genre.

Healthy Housing Provisions as a Policy Genre

Healthy housing provisions should be understood as a policy genre. In making this case, I recognize that policy writ large could also be framed as a genre, distinct from law, or fiction, and healthy housing provisions as a lower order ‘subgenre’ (see Collin, 2012). However, following Michel Foucault (1978), it is helpful to frame these higher order categories as discourses, or discursive formations. As a structured domain of meaning, the discursive formation can be characterized by its dominant epistemological approaches to organizing knowledge and conceptualizing experience, and the ways that subjects, bodies, and language actualize and reproduce those meanings in social and institutional contexts. Simply, legal, fictional, scientific, and other discourses underpin the form and bear significantly on the circulation of texts thus defined. Within policy discourse—which itself is augmented by historically inherited modes of writing, organizing knowledge, and social power attributed to actors and institutions—we can identify numerous genres, or classes of texts that share aesthetic and rhetorical conventions, intentions, and audiences. Among these ‘genres of governance’ (Fairclough, 2003) are the directive, the announcement, the evaluation, the report, the list, and so on.² Of course, as with all genre studies, this distinction between discourse and genre is an analytic one, drawn for the purposes of classifying texts to better

understand their features and effects. This pragmatic conception helps to ‘[make] a written artefact analysable’ (Apthorpe, 1997, p. 34). Just as the list is as likely to appear in poetry as in the file, (though with different interpretive expectations and social implications), healthy housing provisions vary in terms of their legislative grounding, the detail of related policies designed to direct their implementation (such as inspection procedures), the tools they legitimate, and the communities of practice by which they assume social significance.

For John Frow (2006), every genre entails a particular ‘structure of address’, ‘moral universe’, and set of ‘truth effects’ (p. 9). By this, Frow highlights that genre is more than a set of common formal or aesthetic conventions. Genre anticipates its audience, is active in the production of ways of understanding the world, and depends on social recognition for its ongoing reproduction. In this article, it is helpful to frame healthy housing provisions as a genre both for describing common features and aims, and for comparative analysis, given the policy transfer and diffusion of this approach to housing governance (Marsh & Sharman, 2009). Frow’s characterization encourages consideration of the subjects and objects that healthy housing provisions address, and the demands made of and by them. It suggests that attention is paid to the conceptions of housing and the social that these policies help to constitute, and to the representational techniques by which such truth effects are achieved.

Healthy housing provisions adopt a structure of address common to modes of legal and policy writing. A central feature of the genre is the universal application of minimum standards to rental accommodation—as opposed to policies that target specific demographics or which distinguish between housing types.³ The anonymity of the authorship of provisions represents the collective production of such documents—as they circulate within and across departments, working groups, councils, and legislatures—and which vanishes the trace of any

conflict between stakeholders from resulting compromises. This structure of address also generates a dehistoricizing effect, where if provisions are approved, new governmental requirements are rendered the natural order of things—as what is known and what stands to reason (Apthorpe, 1997). The moral universe of healthy housing provisions is one defined by the property relation, and the expectation that rent must be exchanged for the use of accommodation owned by a state or private party. It is thus a reformist genre, aimed at improving the situation of the tenant, rather than eradicating private property, or promoting alternative forms of tenure. Regarding what Frow calls genre's 'truth effects', healthy housing provisions prioritize a conceptualization of housing as health-conferring over and above competing housing paradigms, such as housing as an economic good (Iglesias, 2009). The genre also consolidates state authority as arbiter of whether minimum standards have been achieved, even where adjacent state institutions may be responsible for managing substandard housing.

The recent proliferation of healthy housing provisions demonstrates that the relationship between substandard housing and reduced resident health outcomes is well established and that government policy is deemed an appropriate strategy to improve such outcomes (WHO, 2018; Ige *et al.*, 2018; Plerhoples Stacy *et al.*, 2018). Whether health outcomes are explicitly inferred, as in 'healthy homes standards', or technical language masks a universal moral prerogative, as in 'minimum quality requirements', the trend to establish regulations for residential rental accommodation recognizes this connection, and the structural vulnerability of renters to directly intervene in housing-related health risks (Easthope, 2014). This is the basis of the WHO's *Housing and Health Guidelines* (2018) and this relationship underpins countless public health surveys regarding associations between domestic environments and the prevalence of infectious diseases (Trenholme *et al.*, 2012), chronic conditions (Free *et al.*,

2009), mental health issues (Krieger & Higgins, 2002), and injuries (Keall *et al.*, 2012). Effective or not in maintaining housing quality (and therefore augmenting health outcomes), minimum standards establish obligations for property managers and contractors, and an accountability mechanism for public servants, residents, and their advocates, where they are not met (Goodchild, 2001).

Socially, healthy housing provisions are a genre established through compromises forged between the interests of renters and landlords, and recognition of the practical difficulties of inspecting and maintaining housing (Martinelli, 2017). Key formal features of the genre are: definitions; the clarification of applicability; the designation of administrative responsibility and power; listings of minimum hardware standards; exemptions; registration requirements and inspection processes; a penalty regime for violations; and an explanation of funding or fees. The inclusion of such recognizable features increases the likelihood that textual prerogatives are decoded as intended (Hall, 1980). Following Rick Altman's (2012) semantic/syntactic theory of genre, we can expect such conventional features to appear within any specific text—as its semantic content, the repetition of which provides the genre with some rhetorical stability. For Altman, genre's syntactic dimension refers to the conventional building blocks of narrative, or the generic means of recognizably ordering those elements. For example, the semantic elements of a classic western include landscape shots, cowboy fashion, ranch settings, and traditional gender relations, while the syntactic structure might follow a journey into the American frontier, an encounter with morally bankrupt villains, and a restoration of social order. In healthy housing provisions, a linear logic typically organizes interdependent semantic features: applicability determines the housing to which provisions are relevant; the specification of minimum requirements distinguishes the genre from already existing standards for habitability and security; those minimum standards require a regime

legitimated to enforce them; and funding to be enacted. Like law and policy generally, the genre presumes its performative effects (Kahn, 1999; Butler, 1990). In their establishment, novel provisions demand consensus over their standards, articulate a network of actors authorized and obliged to operate according to their descriptions, and require forms of institutional work to occur, such as registration, inspections, and tax collection.

However, the introduction of healthy housing provisions provides no guarantee of their efficacy. Just as fictional texts emerge by assembling recognizable semantic and syntactic content, so too new policy enters intertextual fields defined by the ongoing operation of prior laws and regulations, appropriating the approaches of adjacent jurisdictions, and haunted by policies and institutional norms no longer ‘on the books’. As in all genres, an individual text’s relation to a particular class depends as much on wider cultural recognition, as it does on its internal content. This recognition, which might otherwise be framed as policy support or uptake, is strengthened by ‘paratexts’ (Gray, 2010), which for healthy housing provisions include cost-benefit analyses, discussion papers, reports on trial programs, news coverage, council and parliamentary speeches, and so on. That is, the success of any particular policy depends on both its explicit content developed by a community of practice and the responses of a diverse public (Smart, 1993), which will range from enthusiastic buy-in, to refusal, to disregard, and institutionally-constrained action.

In any context, policy success thus depends on a confluence of program, process, and political factors (McConnell, 2010). David Graeber (2015) argues that ‘bureaucracy is the first and only social institution that treats the means of doing things as entirely separate from what it is that’s being done’ (p. 165). This is a useful reminder of the potential for regulatory intent to become disarticulated from implementation and effects; for example, the potential of

healthy housing regulations to reduce the availability of affordable housing and increase pressure on under-resourced community housing providers to meet higher standards. Policy ethnographies demonstrate the difficulty of practically disentangling the intents and techniques of bureaucracies, in lived fields of both policy design (Lea, 2008; Ronald, 2011), and delivery (Summerson Carr, 2015; Hoag, 2014). Rather than framing policy in teleological terms—as an object that, once introduced, might be presumed to manifest its intent—I consider an ecological understanding more instructive for the following analysis. By ‘policy ecology’, Tess Lea (2020) means ‘both the ecology of policy environments themselves, and the variegated connections that flow through the alive, inhabited worlds that policy emanates from and enters into’ (p. 21). It is not only the case that new policies are not introduced into social worlds *carte blanche*, but that prior inheritances and conflicting prerogatives morph their objectives, skew their interpretations, and revise their significance. Rationalism is thus a necessary semantic feature of the policy artefact, and technique of policy design, but the expectation of outcomes corresponding to intent must be tempered, and informed by a thorough understanding of the context of implementation.

Methods

This essay emerges from a larger program of research and policy work predominantly focused on regional and remote Indigenous housing in northern and central Australia. This work considers the health implications of substandard Indigenous housing and the labour required to ensure adequate housing quality and function. In this and other contexts, generalised minimum standards in residential tenancies acts and regulations provide limited protections for tenants and have resulted in protracted legal disputes over landlord failures to

maintain housing at adequate levels (see Grealy and Lea, 2021; Grealy, 2021). While such disputes may result in compensation, they do not necessarily improve housing quality.

Healthy housing provisions promise to provide additional specificity regarding the minimum standards that houses must meet post-occupancy. In 2019, the Northern Territory's review of the *Residential Tenancies Act 1999* (NT) provided impetus for the Housing for Health Incubator to convene a policy roundtable on the topic of healthy housing provisions, involving Incubator partners Healthabitat and Australian Lawyers for Remote Aboriginal Rights, as well as representatives from NSW Health, Aboriginal Housing NT, the Aboriginal community housing sector, and academic researchers. The workshop considered healthy housing standards as a particular intervention to support higher quality remote housing, informed by ongoing policy advocacy in New Zealand and New Orleans. It acknowledged the dividend to be derived from comparative policy analysis, while recognizing the need to understand the specificity of jurisdictional contexts for which new policy is advocated and designed.

In this vein, I proposed a series of generic questions for examining healthy housing provisions that are applicable to diverse housing contexts. These draw attention, respectively, to existing standards, governing authorities, maintenance regimes, and tenant advocacy networks, as well as the simultaneous reforms of building codes, compliance regimes, and the social housing sector that might also be required to guarantee any meaningful impact of healthy housing provisions. The following questions organised the discussion in that workshop and inform the case studies in the following sections:

- What standards for safety or habitability already exist in specific jurisdictions and how might these be improved?

- What authorities are charged with inspecting that standards are met and, if not, with enforcing landlord compliance?
- What maintenance regimes are needed to meet minimum standards, and how can they be guaranteed, including for different tenure types?
- What do healthy housing provisions offer to tenant advocates confronting issues of landlord neglect?
- What additional work around renters' rights, building design, or code compliance is required to complement minimum housing standards?
- What additional institutional reforms are required for effective healthy housing provisions, and what obstacles might be anticipated?

In addition to the workshop, this essay also draws on long-term ethnographic fieldwork in New Orleans (2017-2020) and at various sites in the Northern Territory (2018-). For both New Zealand and New Orleans, it is based on a review of literature, legislation, and grey documents including discussion papers, cost benefit analyses, regulatory impact statements, reportage, and so on. Regarding New Orleans, it also draws on interviews with key legal and policy stakeholders in the affordable housing sector. Together, these methods inform the case study approach, which considers the policy artefact—the regulation listing minimum standards and directions for their application—in relation to the contextual requirements to legitimate this regulatory mechanism and its effective implementation. The in-process status of the New Orleans ordinance highlights the context-specific obstacles for this type of regulatory reform.

Healthy Homes Standards in New Zealand

New Zealand's recent reforms offer an archetypal example of the healthy housing provisions genre. With 'a known reputation for excellence in housing and health policy' (WHO, 2021), New Zealand established a minimum standards regime under the *Residential Tenancies (Healthy Homes Standards) Regulations 2019* (NZ), effective from July 2019. Going beyond landlord responsibilities and hardware standards dispersed across the *Residential Tenancies Act 1986*, the *Housing Improvement Regulations 1947*, the *Health Act 1956*, and the *Building Act 2004*, the 'Healthy Homes Standards' set minimum requirements for heating, insulation, ventilation, moisture ingress and drainage, and draught-stopping across New Zealand's approximately 592,000 rental households. Included standards are typical semantic content of the healthy housing provisions genre, while depending on related regulations and recognizing the specificity of New Zealand's cold, damp climate. For example, a specific insulation requirement reads, 'The minimum level of ceiling and underfloor insulation must either meet the 2008 Building Code, or (for existing ceiling insulation) have a minimum thickness of 120mm'.

The requirements of the policy artefact obscure the possibility that the standards might have been otherwise, listed in an anonymous authorial voice that disguises the diverse inputs. The *Healthy Homes Guarantee Act 2017*, which followed minor changes to the *Residential Tenancies Act 1986* in 2016 concerning insulation and smoke alarms, legitimated the New Zealand government's development of regulations for rental tenancies. Subsequent cost-benefit analysis produced by the New Zealand Institute of Economic Research considered the relative impact of various standards (NZIER, 2018), and public consultation solicited feedback on possible options. A discussion paper was released in 2018 (MBIE, 2018), which along with an illustrated brochure sought submissions on options related to heating, insulation, ventilation, moisture ingress and drainage, and draught stopping. For example,

members of the public could respond to the appropriate minimum level of insulation and whether heating should be required in living rooms and bedrooms. The proposed options had been assessed against criteria including their achievability, cost and benefits to landlords, tenants, and government, and capacity to endure and enable future building innovations (MBIE, 2018). The public consultation process in 2018 received 1777 submissions, with a relatively even contribution from tenants (776) and landlords (684) (MHUD, 2018a), and were supplemented by workshops with key stakeholders. Unsurprisingly, tenants typically provided support for the proposed standards while many landlords ‘sought the least amount of change from the status quo for all provided options’ (MBIE, 2018a, p. 4).

The options for consultation and the eventual standards were also informed by sustained empirical research and advocacy connecting substandard housing and poor health outcomes from the He Kainga Oranga Housing and Health Research Program at the University of Otago (see Telfar-Barnard *et al.*, 2019; Howden-Chapman, Bennett, and Siebers, 2009; Howden-Chapman and Wilson, 2000). This research involved various controlled trials and economic evaluations that demonstrated the potential dividend of universal healthy housing standards (Howden-Chapman, Baker, and Bierre, 2013). The longevity and high regard of this research program girded support for reform proposals from within the government and public alike. Sarah Bierre and Philippa Howden-Chapman’s (2020) analysis of this policy history considers the fate of New Zealand’s Healthy Homes Standards in relation to Keith Jacobs *et al.*’s three conditions for housing problem definitional success: ‘first, a convincing narrative needs to be deployed to tell a plausible story of a social problem. Second, a coalition of support has to be constructed, and finally this coalition needs to ensure that institutional measures are implemented’ (2003, p. 430). In media coverage, political debate and other public discourse rental advocates employed narratives to frame poor quality

housing and children's ill-health as problems for the public agenda, in the face of defensive counter-narratives focused on excessive regulation and increasing rents (see Bierre & Howden-Chapman, 2020).

The eventual publication of the 'Healthy Homes Standards' depended on those provisions' paratexts (the cost-benefit analysis, discussion papers, brochures, an online heating calculator to support landlord compliance, advocate stories, and so on), and their circulation by an effective coalition of support (Telfar-Barnard *et al.*, 2019; Bierre & Howden-Chapman, 2020). Collectively, these texts consolidated a moral universe in which greater specificity of minimum housing standards was *reasonable*, and that the increase to such standards could be achieved with relative low impact on landlords. Compromise between competing stakeholders is nonetheless evident in both the restricted application of standards (such as fixed heating requirements in living areas but not bedrooms) and the staggered timeline for the implementation of the new regime, which differentiates between private rentals, boarding houses, and community housing. From July 2021, private landlords must ensure that their rental properties comply with the standards within 90 days of any new or renewed tenancy and all rental homes are required to comply by July 2024. From late 2020, landlords are required to provide a statement of compliance with the standards in any new or renewed tenancy agreement (and, as required, to the Tenancy Tribunal or Tenancy Compliance and Investigations Team) to make (non)compliance visible. However, the push for more expansive regulation of housing standards was not wholly successful. A rental housing warranty of fitness (WOF), including a checklist of 29 items to be assessed every three years and based on the Healthy Housing Index (HHI) assessment tool, has been developed and trialed for rental properties, but this remains a voluntary program for landlords.

in Wellington only, despite calls to make it mandatory and for a national database of landlords (WHO, 2021; Telfar-Barnard *et al.*, 2019).

The limits of this system's potential to ensure housing meets minimum standards are evident in compliance and penalty arrangements. As one public submission noted, 'The Housing Improvement Regulations of 1947 show that regulations are largely meaningless if people are not aware of them, or if they are not enforced' (MBIE, 2018a, p. 17). Notably, despite a consultation process during which 'Many submitters supported a requirement for mandatory inspections by qualified professionals to ensure compliance with the standards' (MHUD, 2018b, p. 29), compliance does not involve proactive inspection of all residential rental properties (though there is some capacity to randomly audit housing). Instead, tenants must hold landlords accountable through applications to the Tenancy Tribunal, or by complaint to the Tenancy Compliance and Investigation Team. With an expanded capacity this team can perform 2000 risk-based interventions annually (0.35 percent of New Zealand's rental housing), of which 1500 are likely to be 'light touch cases' (for example, seeking evidence rather than conducting an investigation or property inspection) (Treasury, 2020, p. 75). The compliance team can issue formal warnings, establish compliance agreements, or bring proceedings to the Tenancy Tribunal on a tenant's behalf. A determination at the Tenancy Tribunal of a landlord's failure to meet the minimum standards can result in exemplary damages or a financial penalty of up to \$4000, typically awarded to the tenants, as well as compensation for material or general damages (MHUD, 2020). However, as submissions also noted, tenancy records are searchable online by prospective landlords, potentially dampening tenants' willingness to exercise their right to housing that complies with these standards.

New Zealand's 'Healthy Homes Standards' thus exemplify evidence-based policy developed over a long period and through significant public consultation, but also compromises made by policy-makers to satisfy competing interests and to manage implementation costs. The genre of healthy housing provisions rarely highlights such compromises itself. Instead, these are typically evident in healthy housing paratexts and in the details of minimum hardware standards, the obligations relating to mandatory or proactive inspections, and the mechanisms for resolving failures to meet minimum standards.

New Orleans' Rental Registry Program

Efforts are ongoing to establish healthy housing standards under a rental registry program in New Orleans. Governed as Orleans Parish, the city has an estimated 391,000 population and 155,000 occupied housing units (US Census Bureau, 2018). Housing quality is widely variable, with 66,000 units over 80 years old, and widespread issues with mould, leaks, termites, and fire safety. Southeast Louisiana is a hot-humid climate for which American building science emphasizes the need to 'keep it dry': sealed building envelopes with vapor retarders, central HVAC systems, and post-in-ground construction. Nonetheless, much housing lacks insulation, relies on window cooling units, and sits on cracking concrete foundations. An Office of Community Development Assessment of Fair Housing noted that, 'As much as 78% of the private rental housing stock needed major repairs in the past 12 months' (2016, 61).

As across the US, government housing provision in New Orleans has shifted from public housing to private market subsidization (Goetz, 2013). Public housing demolitions were accelerated following Hurricane Katrina, with a reduction of approximately 5000 units (Arena, 2012; Seicshnaydre *et al.*, 2018). In 2020, about 2000 public housing units remain in New

Orleans, and an additional 19,000 private rental units are involved in the Housing Choice Voucher Program (HCVP), which subsidizes tenants' participation in the private housing market. In 2018, over 35,000 eligible families were included on wait lists for public housing and housing vouchers, which last received applications in 2016 (Williams, 2018). Alongside the reduction in public housing, and extensive wait lists, historic African-American neighbourhoods have quickly gentrified in recent years, raising rents, property taxes, and insurance costs, and the short-term rental industry has extracted approximately 6000 units from the rental market (Jane Place, 2018). Together, these factors generate downward pressure on housing quality, and characterize the context that the healthy homes policy aims to disrupt.

Public housing and private rental housing involved in the HCVP is subject to property inspections administered by the Housing Authority of New Orleans (HANO). This is a US Department of Housing and Urban Development (HUD) requirement conducted according to its detailed 'Housing Quality Standards', which specify various minimum standards. Beyond this, New Orleans is a majority renter city with most tenancies in the private market. Healthy housing provisions thus provide an attractive policy option to improve housing for the approximately 60,000 occupied rental units not governed by HUD's Housing Quality Standards. New Orleans affordable housing advocates first sought to address the problem of substandard rental housing through healthy housing provisions in 2015. Their advocacy resulted in the 2017 Rental Registry Program ordinance, which is represented on the flyer as Figure 1, an exemplary paratext. It includes four key provisions—conventional semantic content structured to a dominant generic syntax—which can be summarized as: standards; reporting mechanisms; registration and inspection, and; funding, each of which require consideration.

[Insert Figure 1. The New Orleans Healthy Homes Ordinance]

In late 2016, the proposed ordinance (New Orleans, 2016) passed Committee at New Orleans City Council and was ready to be voted on. An election season stalled its progress and, despite intermittent pressure from housing advocates and activists, the subsequent city government is yet to progress this agenda. Short-term rentals, evictions, and intermittent natural disasters on the Gulf coast have variously dominated the housing policy focus across this period. In the draft ordinance, which would amend the Code of the City of New Orleans, a range of minimum standards were specified. For example, '3. Every Residential Rental Unit shall contain a bathtub or shower, lavatory, a flush-type water closet and a kitchen sink, which shall be maintained in a sanitary and good working condition' (City of New Orleans, 2017, p. 12). The draft ordinance standards do not constitute an ideal list developed from healthy housing first principles. Rather, the list represents protracted negotiations between affordable housing advocates and politically powerful construction, landlord, and realtor associations. Affordable housing advocates note that New Orleans would not legislate standards equivalent to HUD's stringent 'Housing Quality Standards', both because this would lose the support of landlord associations and generate mass failures in subsequent rental inspections. The resulting list signals broader compromises made about both minimum standards and the amenities they apply to—the inevitable '*ad hocery, negotiation and serendipity*' of policy-making (Ball, 1993, p. 11). As the New Zealand case study shows, healthy housing provisions can extend to specify insulation standards, or further to require comprehensive energy ratings, but negotiations structured by the 'split incentive problem' typically result in tenants continuing to bear inflated utility costs underpinned by energy inefficient housing (MacAskill *et al.*, 2019; Liu *et al.*, 2019).

The draft ordinance's list of 'Rental Standards' wavers between the particular and the general in terms of requiring specific hardware and setting material specifications. This indicates a

broader issue of drafting healthy housing provisions, regarding the detail of prescribed standards useful for inspection professionals or reasonable for landlords to meet. If minimum standards imply the inadequacy of general habitability and security clauses, these might adopt a function-focused language, such as prescribing that a house provide the ability to safely store and cook food. Alternatively, as in New Orleans' draft ordinance, such standards will specify hardware required to perform that practice: an oven, cupboards, and so on. Under this latter, more common approach, a question remains about whether minimum specifications for that hardware should exist. For example, under HUD's 'Housing Quality Standards' (which distinguish between performance requirements and acceptability criteria), an oven must be provided, but a microwave oven will suffice. If an oven and range were instead required, would any hardware do, given the relationship between inefficient appliances and energy poverty? Further, while we might agree that three broken hotplates of four is dysfunctional, should regulatory criteria include this level of detail? In his Milwaukee-based ethnographic study of eviction, Matthew Desmond (2016) narrates that 'Like many inner-city landlords, Sherrena and Quentin tried to limit the number of appliances in their units. If you didn't include a stove or refrigerator, you didn't have to fix it when it broke' (p. 138).

The flyer outlining the New Orleans draft ordinance also signals the requirement that healthy housing provisions legitimate particular forms of social action, specifically those related to reporting problems with rental properties. However, such actions are constrained by pre-existing laws, policies, and the norms that they have instantiated. In New Orleans, a liberal city in a conservative state, reporting is a renters' rights issue that intersects with broader concerns about retaliatory evictions. Unlike many other US states, Louisiana has not adopted the *Uniform Residential Landlord-Tenant Act*.⁴ Tenancies are instead governed by very general leasing provisions in the Louisiana Civil Code, in which article 2682 simply states that 'The lessor is

bound: (1) To deliver the thing to the lessee; (2) To maintain the thing in a condition suitable for the purpose of which it was leased; and (3) To protect the lessee's peaceful possession for the duration of the lease'. Under the Louisiana Civil Code, a no-cause eviction with ten days' notice can be delivered to a tenant on a month-to-month lease, while a with-cause eviction requires five days' notice (JPNSI & Finger, 2019; Landry, 2016).

Such weak protections provide the potential for retaliatory evictions by landlords in response to tenant complaints. The likelihood of tenants making complaints is further diminished in the context of an affordable housing shortage, and where eviction has implications for maintaining a housing voucher, recouping a security deposit, and homelessness. In Louisiana, the moral universe promoted by the New Orleans Healthy Housing Ordinance is discursively and politically possible—though not yet passed—because it both asserts state leasing law and relies on the police powers of local government. Attempts to strengthen renters' rights against eviction are more likely to suffer state pre-emption, for contradicting Louisiana law on private contracts. Even in contexts where tenants have stronger protections against eviction, an important question is whether it is possible to establish effective healthy housing provisions without also strengthening renters' rights, in particular regarding eviction.

The New Orleans draft ordinance recognizes that without mechanisms to enforce their application, minimum standards are relatively meaningless (Lubell, 2017). A system that aims to proactively lift housing quality can thus be bolstered by a database for managing inspections and their results. US jurisdictions approach this in various ways. Kansas City requires the licensed registration of rental properties. Cities including Sacramento, St Louis, Boston, and Seattle conduct proactive inspections. The key elements of such regimes are registration of properties, regular inspections, and enforcement (ChangeLab, 2014). However, landlords are unlikely to

voluntarily register to systems that surveil them. Thus an effective means to collect this data and automate communication about material standards, inspections, and fees is often sought. In New Orleans in 2016, backroom debate concerned who would be tasked with establishing and administering a rental register. Advocates for local employment argued against contracting an out-of-town company with proprietary software that could scrape the details of rental properties from the Orleans Parish Assessor's Office data on homestead exemptions. If the New Orleans draft ordinance is passed, responsibility for designing and managing a rental register remains to be determined.

Currently, property inspections in New Orleans are undertaken by the City's Division of Code Enforcement. This team does respond to tenant complaints about housing quality, but rarely, and only since 2018. The primary focus of Code Enforcement concerns complaints about visible blight, or the public aesthetics of often vacant properties. Such complaints generate city fines, which impede the payment of property taxes, providing grounds for the city to take possession of properties which are on-sold to developers at a Sheriff's auction. If the Division of Code Enforcement was charged with inspections according to the draft ordinance, this team would likely require expansion, retraining, and auditing. This issue is key to the implementation of healthy housing provisions generally: what level of expertise do inspectors, as 'street-level bureaucrats' (Lipsky, 1980), require to determine that a house is 'free from mold' (as Figure 1 suggests) or 'No evidence of mold shall be present' (as specified in the draft ordinance)? This is a larger issue regarding the differences between 'check-box' assessments of housing quality (does the house contain a stove; is mold visible?) and more rigorous approaches to testing hardware function and assessing the indoor environment. Any transition toward the latter might also require significant reorientations in how institutions approach house inspections: from fining

homeowners to protect neighbouring property values, to assessing housing quality for tenants' health.

The claim that the New Orleans draft ordinance would be revenue neutral, funded by inspection fees, is reasonable enough to not require significant consideration here. Cost estimates for establishing and administering the rental registry are not publicly available, and the New Zealand case demonstrated the value of cost-benefit studies to both inform public consultation and win the political debate about public health gains and associated economic savings over the long term. Such budgets would also be required for this policy genre in New Orleans, and at this stage any proposed system is vulnerable to further compromises over its integrity, particularly regarding the recruitment of relevant personnel and their training, and the extent and frequency of inspections.

Considered together, New Orleans and New Zealand offer markedly different case studies of a generic policy aim—improving tenants' health outcomes via quality rental housing—pursued through a generic policy tool—healthy housing provisions. The jurisdictional differences between the national government of a small country and the liberal city government of a conservative US state shape the horizon of possibility for these reforms, the willingness or need to compromise on minimum standards, and the likelihood of both policy being passed and its positive impact. Relatively larger public and community housing sectors in New Zealand provided opportunities to trial healthy housing programs and tools, generating data which has been important to advocacy and strengthening a research program that has influenced debate in the public sphere. There is no equivalently influential body of research in New Orleans, in part because housing researchers and advocates have been required to prioritise other issues, such as weak protections against eviction, the rampant gentrification of historical black neighbourhoods,

and rebuilding and climate change mitigation efforts. Even if this ordering of priorities was revised and data demonstrating the economic benefits of healthy housing was produced, the argument for healthy housing reforms is likely to remain a moral-political one, given the federal subsidization of a largely privatized health system, and the limited direct economic gains for the state government. Despite these differences, both contexts demonstrate the central importance of inspections processes to the effective implementation of healthy housing provisions, and inspections requirements as a key site of political contestation. Given the structural inequality between tenants and landlords, exacerbated by all the exclusionary factors of the rental housing market (inadequate supply, rising rents, no-fault evictions, citizenship requirements, discrimination, and so on), it is unlikely that any system that relies exclusively on tenant-based reporting will significantly improve the material standards of private rental properties.

Conclusion

Driven by a wave of reforms across many countries, this article has framed healthy housing provisions as a policy genre with a particular structure of address, moral universe, and set of truth effects, as well as conventional semantic and syntactic content. Using theories of genre to understand healthy housing provisions is instructive for clarifying what formal features such provisions should include, what is required for their effective enactment, and what forces dampen their implementation and efficacy. Healthy housing provisions typically encapsulate compromises made between the interests of renters and landlords, with material requirements tempered by the institutional, financial, and practical difficulties of implementing inspection regimes that would ensure functional and safe rental housing. The case studies examining New Zealand's Healthy Homes Standards and New Orleans' draft

ordinance indicate how such generic policy features are iterated in contexts characterized by varying housing stock, legal regimes, housing markets, and forms of government.

As in New Zealand, the ongoing debate in New Orleans has involved a number of common criticisms of healthy housing provisions from various stakeholders, including affordable housing advocates (Bierre & Howden-Chapman, 2020). These include, first, that rents will increase as repair and maintenance costs are shifted to tenants. Second, evictions will increase as landlords evict tenants in order to conduct renovations. Third, affordable housing stock will be reduced as substandard houses are condemned. Fourth, ‘Mom and Pop’ landlords will be struck with the cost of major renovations and fines for failing to complete them. And, fifth, increases in housing quality will accelerate gentrification. The likelihood of such eventualities warrants further empirical investigation and economic modelling, especially in New Orleans. But the first three of these criticisms, in particular, are legitimate concerns for the potentially perverse effects of regulations aiming to improve the material quality of rental properties. Together, the potentials outlined by these criticisms illustrate the importance of understanding the establishment of new policy in ecological terms. In relation to healthy housing provisions, this includes the need to simultaneously promote public and community-owned housing in the affordable housing sector, strengthen tenants’ rights against eviction, and produce safeguards against code compliance generating widespread property condemnation, including the public resourcing of emergency repair work. If these outcomes are not also pursued, then a narrow understanding of policy success can be achieved at the expense of more significant housing losses.

Notes

¹ South Australia has specified minimum housing standards since the *Housing Improvement Act 1940*, but most recently updated these in the *Housing Improvement Regulations 2017*.

Tasmania has applied minimum standards to new leases since August 2015, and to all tenancies since 2018. Victoria has passed the *Residential Tenancies Amendment Act 2018*, outlining 130 reforms to be implemented by July 2020. New South Wales (NSW) has passed the *Residential Tenancies Amendment (Review) Act 2018*, which includes the introduction of minimum standards for rental properties to satisfy the description ‘fit for habitation’ in amended regulations.

² See, for example, Rude (1997) on the scientific report as a genre characterized by conventional rhetorical arguments and the intent to influence social action, and Zanola (2010) on the development of a specific method to analyze the genre of the annual report.

³ Most healthy housing provisions curtail their application to residential accommodation where a lease or tenancy agreement applies, excluding campgrounds, trailer parks, and tourist accommodation, and sometimes set different standards for boarding houses.

⁴ See Horwitz-Willis *et al.*’s (2018) analysis of state health and habitability laws, which considers the adoption by states of elements of the *Uniform Residential Landlord and Tenant Act*, converted into Habitability Element Rating Scores (HERS), and the relationship between HERS raw scores and state political and demographic characteristics.

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