Manufactured Homes Survey 2013

Report on Findings

Review of the *Manufactured Homes (Residential Parks) Act 2003*
The cover image illustrates the frequency of words used by survey respondents to describe what they most like and least like about residential park living.

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PREAMBLE

Residential parks have become de facto retirement villages and senior’s lifestyle resorts for many older Queenslanders. People are attracted to the social aspects of park living, the security it provides, and the package of services typically included such as clubs, facilities, transport, and maintenance of shared areas. People are also attracted to the idea of lower ongoing costs, lack of exit fees, greater sense of independence and personal control, and higher degree of ownership compared to some other options for retirement living.

Owning a manufactured home is a relatively unique form of home ownership. A resident owns their home, but rents the site the home is on from a residential park owner. A manufactured home is designed so that it can be relocated, but the costs associated with a move can be substantial. Contemporary manufactured homes can rival attached dwellings in their price and features, but can be a more complex marketing prospect for owners selling them.

The position of manufactured home owners could be a precarious one in the absence of legislation purpose built to protect them. The Manufactured Homes (Residential Parks) Act 2003 aims to provide that protection. It seeks to ensure that home owners are not subject to unfair business practices, and to enable existing and potential home owners to be aware of their rights and responsibilities and to make informed choices about park living.

The Act also ensures the capacity of park operators to run stable, viable and enduring businesses. This is provided by measures such as allowing application for site rent increases not dealt with in site agreements to cover extraordinary costs of operating, providing a right of consent for re-assignment of site agreements, and the persistence of site rent obligations for vacated homes.

There is an ongoing need to ensure the Act continues to meet its objectives. Queensland’s population is ageing, and ensuring the housing needs of seniors are appropriately met is an ongoing Government priority. The results of this survey will assist in achieving that priority, and inform further work addressing senior and aged housing issues in Queensland.

I would like to thank everybody who took the time to participate in the Manufactured Homes Survey, and am pleased to present this report on its findings.
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EXECUTIVE SUMMARY

The manufactured home owner – a snapshot

The typical owners of a manufactured home in Queensland are a couple with an average age of over 70. If the home owner is one of the approximately 30% of owners living alone, they are almost five times more likely to be female than male.

The home owners most likely live in a manufactured home park in the South East of Queensland in the populous region from the south of Brisbane to the Gold Coast. If they live elsewhere it is most likely in the second largest park concentration along the coast from the north of Brisbane to Hervey Bay.

The income source of the home owners will most often be based on the aged pension, supplemented by Commonwealth Government rent assistance for their site agreement payments, and the Queensland Government’s electricity rebate for their electricity costs. Like 90% of other manufactured home households, their annual gross income is under $40,000.

The typical manufactured home owner does not consider moving into a retirement village when making their purchase (although many do) as they prefer a more affordable form of retirement living, and are attracted to the ‘no exit fee’ option. However they value aspects of their residential park lifestyle that are identical to those often associated with motivations for retirement village living, including a sense of community and availability of friendships, a sense of physical security and safety, and the availability of shared facilities and activities.

The home owners’ most likely bought their home onsite after the year 2000, from the owner or manager of the park, in a park purpose built for 151 or more (usually more) manufactured homes. While house prices vary substantially by purchase year, the home owners probably paid between $100,000 and $400,000, or an average price of $250,000 in 2013 dollars. It is somewhat likely they did not seek legal advice before signing their site agreement. Their site rent now is probably in the range of $260 to $320 per fortnight.

The home owners site rent will have increased at around 4.5% annually, based on an agreement where site rent is increased by either CPI or a fixed percentage (whichever is higher), and the periodic application of market reviews of site rent every three to five years. This will see increases in site rent that have broadly keep pace with historic rates of pension increase, but that are higher than historic rates of all groups of CPI, and slightly higher than rental index increases.

The home owners will probably not be involved in a park dispute before the Queensland Civil and Administrative Tribunal (QCAT); however the likelihood of that occurring will increase the longer they live in their park. There is a greater likelihood they will seek to resolve a dispute internally through a home owners or park liaison committee. Most often those disputes will be about increases in site rent.

If the home owners seek to sell, it will probably be after at least 5 years of living in their park. They are very unlikely to ever move their home.
The survey and submissions

The survey

The survey was promoted through online means, a ministerial media release, direct distribution to manufactured home parks and relevant stakeholder groups. The 991 households that provided a completed survey represent a substantial 6% of all registered potential home sites.

The survey contained 43 items designed to assess the characteristics of home owners, their homes, their site agreements, and their parks. A sub-set of the items assessed broad satisfaction with the Act, and satisfaction with specific aspects of the Act relevant to home sales, termination of site agreements, market rent reviews, and site agreement special terms. Comment fields were provided to allow further information to be provided for six of the key survey items.

Finally, comment fields were provided for respondents to provide in their own words descriptions of their key concerns or experiences in relation to a list of ten topics. These topics were chosen on the basis of the prior survey work¹, and reflect issues that are frequently at the forefront of resident concerns or relevant to commonly disputed matters. 7,215 comments were received across the 16 comment items, which were systematically analysed into topic themes to capture primary respondent experiences, concerns and proposals².

The submissions

Of submissions received, 11 came from stakeholders who were not home owners; none of these submissions used the survey. These submissions include 2 home owner advisory groups, the Manufactured Home Owners Association (MOHA) and the Tenants Union of Queensland, a submission from COTA (the Council on the Ageing Queensland), the Anti-Discrimination Commission Queensland, a real estate agent and the Urban Development Institute of Australia (UDIA).

The five park owners who made submissions were mainly concerned with dispute resolution and the regulation of utility charges. Other issues raised by park owners include the potential to amalgamate the retirement village and the manufactured homes legislation, while other park owners suggest the entire Act should be rewritten to keep pace with industry developments. There were several issues raised by park owners concerning site agreements:

- the agreements are too inflexible,
- should not be assigned,
- mandatory engagement of solicitors prior to signing the site agreements and
- end dates included in site agreements.

¹ Department of Justice and Attorney-General survey of manufactured home residents, park operators and managers, conducted in 2007.

² Percentage frequencies for comment themes do not typically sum to 100%, as many comments contained more than one theme.
Some park owners suggested disputes about market rent reviews should be upheld if the majority of home owners agree. Another issue contained in submissions from industry include the proposition that market rent reviews should remain unchallenged if less than 25% of home owners object.

Park owners alleged the Act favours consumers and the process to increase rent is too complex. The reduction of red tape was proposed while one park owner suggests home owner organisations should be constrained from spreading misinformation.

**How representative are the survey results?**

The survey is based on a self-selection sampling methodology. As respondents were self-selected any interpretations made in reference to the broader population of residents must acknowledge the potential impact that self-selection biases have had on the results obtained. The characteristics of home owners motivated to participate in the survey, where they differ from the rest of the resident group, may be disproportionately represented in the results.

As an example, the results show that 49% of respondents do not believe the Act provides sufficient consumer protection. However, it is likely that dissatisfaction with current experiences and circumstances would increase motivation to respond to the survey as a means to raise awareness of issues and ultimately effect change. It is also likely this type of dissatisfaction would be strongly related to a belief that the Act does not provide sufficient consumer protection. The expected result would be a population disproportionate number of survey respondents who believe the Act does not provide sufficient consumer protection. Where that dissatisfaction is also related to other respondent characteristics, they would also be disproportionally reflected in the results.

Acknowledging the potential for biasing influences in the results should not be seen as diminishing the value of the responses received, or the value of conclusions that can be made about the circumstances, issues and perspectives of responding residents. To rely on a truism: a lot of people is a lot of people. While, for example, the proportion of all manufactured home park households (as opposed to respondent households) that believe the Act does or does not offer sufficient consumer protection cannot be accurately determined, each group of respondents will broadly reflect the circumstances of a considerable number of households that did not respond.
MANUFACTURED HOMES SURVEY 2013 – ANALYSIS SUMMARY

Residents

There are more than 14,000 home sites in registered parks across Queensland. Assuming each site is occupied, and assuming rates of single or couple living provided by survey results, there are approximately 24,200 people living in manufactured homes.

Manufactured home owners in Queensland are mostly of retirement age (88% are aged 65 or over), and most live as couples (72%). Overall there are more women than men living in manufactured homes due to a relatively large number of women home owners who live alone (35%).

Home owners report modest incomes, with most receiving an income of under $40,000 each year (90%). 9 out of 10 receive Commonwealth Rent Assistance payments to supplement their site rent, and the Queensland seniors electricity rebate for their electricity use. Those of retirement age or older (65) tend to have lower incomes than those who are younger than retirement age.

The income and assistance eligibility characteristics of survey respondents suggest that most rely on the aged pension as their primary source of income. This implies that their capacity to absorb substantial increases in living costs will be low if the rate of increase outstrips the rate of pension increase. Pension increase rates historically have been above rates of increase for indexes such as CPI or the rental index (a CPI component). Any future reduction in pension (or other assistance payment) indexation amounts will have a negative (and compounding) impact on affordability for the majority of manufactured home owners.

Reasons for choosing to live in a manufactured home park

Residents either move to a park as part of a retirement lifestyle charge, or retire while living in their manufactured home. More than one in three residents did consider moving into a retirement village: 1 in 2 for residents aged 85 or over. Based on responses to a fixed set of options, most residents chose a manufactured home park either because there are no exit fees, or because living in a residential park is more affordable. More than one in three made the choice for both of those reasons.
Based on responses to the comment item “What do you most like about living in a residential park?”, the aspects of park living that residents most value are the social and community benefits (56%), the security and safety it affords (51%), and the facilities and activities it provides access to (32%). Residents value the friendships they develop with neighbours of similar age and circumstances. They value the physical security and safety of a gated community with on-site staff. They value the availability of organised social activities and services, and access to shared areas or facilities such as pools, club houses, and gardens.

Other reasons for park living include freedom from maintenance and service tasks (e.g. lawn mowing, maintenance of shared facilities), affordability in terms of upfront purchase costs and ongoing living costs, pleasant and convenient locations, and independence of the lifestyle offered.

Manufactured home characteristics

The product range and feature sets of manufactured homes are increasing over time. The price of manufactured homes is similarly increasing. Where once homes were typically bought for less than $100,000 (before 2001), homes are now most often bought for $200,000 or more (2005 onwards). Homes priced at more than $400,000 have been on the market for some time, although they make up only 4% of homes bought by survey respondents (all since 2005). Adjusting for inflation, the average price paid for homes in the five years to 2013 was $293,000. In 2014 there are some manufactured homes for sale for as much as $1.25 million.

Though not a result of the survey, it is understood that integration of homes with the site and its landscaping has been a common practice for some time, and that the level of integration is increasing. As a result of the increasing size and sophistication of manufactured homes and integration with home sites, it is likely that the costs and complexity of moving homes are also on the rise. While figures on average moving costs are not available, a recent (2011) QCAT determination regarding termination of a site agreement and subsequent compensation for home relocation awarded compensation in excess of $51,000 to cover moving costs.

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3 805 comments received.

4 W & T Enterprises (Qld) Pty Ltd v Way, Bemi & Musgrove [2011] QCAT 118
Only 7% of survey respondents moved their current home into their park. It is very likely that homes will stay where they are built barring park closure or termination of site agreements. Today most parks build and sell their homes on site.

Manufactured home parks

Based on the department’s registry of manufactured home parks there are 168 parks in Queensland. The Wide Bay region\(^5\) has the greatest number of manufactured home parks, followed by the Sunshine Coast, Logan-Beaudesert, Gold Coast and Fitzroy regions. These five regions contain 59% of individual parks.

Looking at the number of sites, the largest number is situated in the Logan-Beaudesert region, followed by the Gold Coast, Sunshine Coast and Moreton Bay-North regions. The parks in these five regions contain 76% of all home sites.

![Home sites by region](image)

**Figure 4: Data from departmental register of manufactured home parks**

Based on manufactured home park registry data, 69% of households are in parks with more than 150 sites: these parks by number are only 24% of all parks in Queensland. The single biggest group of households are in parks with between 201 and 300 homes (32%). There is a large group of parks with 20 or fewer sites (44%) that house only 3% of all households.

The survey results are remarkably similar to the registry results, despite large differences in response rates across regions. Based on survey data, 70% of households are in parks with 151 or more sites, and the single biggest group of households are in parks with between 201 and 300 homes (38%).

\(^5\) Australian Bureau of Statistics Australian Statistical Geography Standard (ASGS) level SA4 used for regions.
Based on survey responses, the majority of respondent’s home sites are in purpose built parks (87%). Mixed use parks, where manufactured home sites and other forms of accommodation are provided (e.g. caravan sites, short-term or holiday accommodation) are likely to be older parks, as 44% of respondents in mixed use parks have lived in their park for 10 years or more, while only 19% of survey respondents in purpose built parks have lived there for 10 years or more.

Survey results, combined with what is known of the ongoing development of the residential park sector, suggest that parks are generally increasing in size.

Most parks have on-site managers (88%). Based on the comments provided by respondents to the item “What do you most like about living in a residential park?” having staff onsite and available is something that is valued by many residents, particularly when it relates to security or safety aspects of park life. Comments also indicate not having an on-site manager or generally having limited availability of staff is an issue of significant concern for many residents, particularly when it comes to home sales, requests for assistance, or a need to directly communicate resident concerns.

**Site agreements**

Most respondents have a Manufactured Homes (Residential Parks) Form 2 Site Agreement (93%). Site agreements contain special terms and park rules specific to the park. Those who do not have more often purchased lower priced homes.

The majority of respondents did not seek legal advice before signing their site agreement (57%), although if they did, they generally found the advice useful (79%).

Only 36% of respondents who bought their home from its previous owner were assigned the site agreement. Respondents providing comment on the question “Is there adequate provision for the sale of a manufactured home?” raised concerns that in some cases park owners or managers may hinder home sales by exercising their right to refuse re-assignment of site agreements. The alleged reasons for this include securing a new agreement more favourable to the park owner, or enabling the park owner to purchase the home at a lower price.

The majority of respondents are satisfied with the special terms of their site agreements (60%), and are satisfied with the process involved in terminating site agreements (63%).

Site agreements typically include a CPI increase clause for site rental fees (97%). Respondents generally view CPI clauses favourably. 29% of comments on “Increases in site rent and market rent reviews” viewed CPI increases as fair and acceptable, often in contrast to market rent

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6 330 comments received  
7 608 comments received
review increases. Ratchet or fixed % rate increases which if present are usually combined with the CPI formula are viewed less favourably based on comments to the same item.

Most site agreements also include a market rent clause (73%), more often than not at a frequency of at least once every three years (60%). Only 35% of respondents were satisfied with the market rent clause of their site agreement. Respondent comments indicate broad concern with increases in site rent, particularly those justified on the basis of a market rent review (19% of comments about “Increases in site rent and market rent reviews”).

Site rents

Site rent paid by respondents averages approximately $292 per fortnight, with 68% of rents in the range of $261 to $320 per fortnight. Site rent has been increasing at an estimated average rate of 4.5% annually. For longer-term residents (10 years or more), the effective annual increase is estimated at 5.1%.

This makes the estimated rate of increase substantially above CPI levels, and above rental index levels for particular periods, but equal to or exceeded by increases in the aged pension (not considering the impact of past pension eligibility changes). It is assumed that increases above CPI rate result from the combined impact of fixed % rate increases, market rent reviews, s.71 increases, and other increase determination factors (e.g. land rates increases).

![Graph: Percentage increases from start of residency to Dec 2013](image)

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8 Section 71 of the Act allows for increases in site rent outside the terms of the site agreement to cover significant increased operation costs.
The comments provided by respondents to “Increases in site rent and market rent reviews” show that site rent increases can be a significant concern for many residents. 26% of respondents commented site rents or increase amounts were too high, 25% were specifically concerned with the level of transparency or fairness of site rent increases, and 19% were specifically concerned with increases based on market rent reviews. The single most frequent comment theme described CPI based increases as fair and appropriate (29%), while 15% of comments indicated respondents were generally satisfied with increases in site rent and market rent reviews.

Estimates of site rent affordability based on a full pension income for either singles or couples show that the large majority of site rents provided by respondents would be affordable on pension income (99% for couples, 91% for singles, 95.5% overall). 67% of site rents fall in an affordability index range of 15-19%, which is well below the threshold.

**Home purchases and sales**

The majority of respondents bought their home from the park owner or manager (64%), with the remainder almost exclusively purchased from the departing park resident.

Survey results suggest that where a home owner wishes to sell their manufactured home, it can be on the market for a considerable amount of time. Of the 9% of respondents in the process of selling their homes, more than 50% had been trying to sell for more than one year, and 31% had been trying to sell for 2 or more years.

One park owner’s submission advised he had two pre-owned homes for sale in one of his parks that took 6.5 and 4 years to sell.

Most respondents have never sold a manufactured home (88%). Where respondents had previously sold a home, it was typically sold for between $100,001 and $300,000 (66% of respondents who had sold homes).

While the majority of respondents believe the Act provides adequately for the sale of manufactured homes (58%), respondents who are currently selling homes are more likely to believe that there is not adequate provision for sale (81%).

Analysis of comments about “Is there adequate provision for the sale of a manufactured home?” indicates a substantial level of concern about home sales. 32% of comments describe a lack of sales effort or professionalism on the part of park staff assisting home owners with their sale. 19% of

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9 Department of Housing and Public Works Affordability Index – affordability index threshold for the lowest 40% of the income distribution defined as \( [(\text{Rent} – \text{Rent Assistance}) / \text{Gross Weekly Household Income}] \times 100 \leq 30\% \)
comments allege sales were in some way hindered by park owners or managers, or that park owners or managers prioritized sales of new homes at the expense of pre-owned home sales (19%).

Respondent comments also touch on the issue of site rent payments that continue while residents are not living in their home and until the home is sold. 11% of comments are concerned with continued site rent payments.

88% of comments for “Paying site fees after leaving a park but before the home is resold” express dissatisfaction with the requirement. 32% of comments propose that site rent should be reduced during vacancy because the owner is paying for access to facilities and services that they no longer use. 15% suggest that accrued site fees could be paid when the home is sold. Two inter-related themes highlight concerns about the impacts on relatives required to assist with or continue payments (15%) and the unfairness of the requirement when a home owner is deceased (14%).

### Dispute resolution

Many respondents indicate they have been involved in dispute resolution processes either internal to their park through a park liaison or home owner’s committee (41%), or through the Queensland Civil and Administrative Tribunal (QCAT) (30%). This rate seems somewhat high to be entirely representative, given it indicates close to a one in two rate of residents in committee disputes, and close to a one in three rate of residents in QCAT disputes. However it should be noted that manufactured home disputes comprise a substantial proportion of disputes before QCAT.

Analyses of the relationships between dispute involvement and a respondent’s broad satisfaction with the Act as measured by responses to “Do you believe the Act offers adequate consumer protection for manufactured home owners?” and “In your experience, do you believe the Act is achieving its aims?” show that respondents who have been involved in either type of dispute are highly likely to also provide dissatisfied responses to these questions. It is arguable that involvement in disputes was a substantial contributor to the likelihood a resident provided a response to the survey.

Respondents who indicated they were involved in either type of dispute were invited to describe the nature of that dispute. Based on comments provided disputes of either type were typically about site rent increases (committee – 52%, QCAT – 71%). Other disputed matters included maintenance and construction issues (committee - 18%), service and utility charges (committee – 11%, QCAT – 16%) and issues related to solar power (committee – 8%, QCAT – 13%).

Respondents were also invited to provide a response to the “Dispute resolution” comment item. While 18% of comments indicated satisfaction with dispute resolution, 23% described inaction or disregard by park owners or managers in response to residents seeking to resolve or air concerns, 23% described dispute resolution processes as unfair or biased (a mix of internal and QCAT matters), and 18% were generally dissatisfied with dispute resolution without further description.

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10 608 comments received

11 413 comments received about committee disputes, 247 comments received about QCAT disputes.

12 439 comments received about dispute resolution generally.
Committee dispute resolution - issues

Figure 8
Other key issues for respondents

In terms of the survey’s broad satisfaction measures, respondents more frequently answered ‘no’ or ‘unsure’ when asked either of:

“Do you believe the Act offers adequate protection for manufactured home owners?”
“In your experience do you believe the Act is achieving its aims?”

Across the measures of satisfaction with specific aspects of site agreements or the Act, respondents were mostly satisfied with:

“Is there adequate provision for the sale of a manufactured home?”
“Are you satisfied with the special terms of your site agreement?”
“Are you satisfied with the process involved in terminating a site agreement?”

However the respondents were more likely to be dissatisfied with:

“If you have a market rent review/review to market are you satisfied with how your site agreement provides for these?”

Collectively these items show a substantial group of respondents do not believe sufficient consumer protection is provided by the Act, or that the Act meets its aims. Market rent reviews in site agreements stand out as a likely contributor to dissatisfaction. As discussed previously, involvement in a QCAT or committee dispute is also highly related to levels of satisfaction across these measures.

The extensive collection of respondent comments provides further insight into issues of concern.
Relationships with park managers and operators

The comment item “The conduct of park managers and operators” received 646 comments.

38% of comments indicated general satisfaction with the conduct of park managers and owners, which is the single most frequent theme. 13% expressed dissatisfaction without further description.

However the remaining comments essentially highlight the ways in which poor relationships between residents and park owners or managers can impact on home owners. Of the primary themes identified, perceptions that management staff are unprofessional or ineffective (16%), have poor communication or negotiation skills (14%), or fall into a range of categories that can be described as incompatible with professional management of seniors in a residential park (controlling, aggressive/bullying, rude/arrogant, unethical – 23% combined) stand out.

Least liked aspects of living in a residential park

The comment item “What do you least like about living in a residential park” received 626 comments.

The comment item “What do you least like about living in a residential park?” also highlighted the importance respondents place on their relationships with residents and management. 47% of comments showed dissatisfaction with an aspect of the behaviour, attitudes or practices of park owners or managers.

Another frequently raised concern was around the costs of park living, including site rent and utility/service charges (24%). Concerns about the sufficiency, quality or withdrawal of services and facilities (17%), as well as those about levels of maintenance and ongoing construction impacts (15%) were also relatively frequent.

Access to the park

The comment item “Access to the park by family, emergency services or other persons providing a service” received 573 comments.

The majority of comments indicated satisfaction with park access (63%). Comments by respondents who were not satisfied with access arrangements most often describe factors making it generally difficult or time consuming to access the park (gate closures, after-hours restrictions, availability of key cards- 22%), or have specific concerns about the ease of access for emergency or health services (17%).

Charges for on-supply of utilities

The comment item “Charges for the on-supply of utilities” received 512 comments.

28% of comments indicated general satisfaction with utility charges. Amongst the most frequent themes were proposals that utility charges should be on a purely cost recovery basis (16%), and that utility cost increases should not be incorporated into site rent through s.71 increases (11%).
Park rules

The comment item “Park rules” received 526 comments.

51% of comments indicated general satisfaction with park rules. The most frequent themes included concerns that enforcement of rules was lacking, selective or inconsistent (17%), that there were too many rules in the park (10%), or that rules were imposed by the park owner without consultation or solely to benefit the park owner (10%).
MANUFACTURED HOMES SURVEY 2013 – ANALYSIS IN DETAIL

Submission summary

1017 surveys were received, with 119 surveys of these completed online through the Get Involved site, and 898 completed in hard copy. 26 surveys (all from the online survey) were removed from the response pool. 5 of these were test responses generated during development and testing of the online survey tool, while 21 were incomplete responses. Incomplete responses resulted from either inactivity timeout during survey completion, or failure to correctly submit the completed survey. The report is based on the remaining 991 valid hard copy and online survey responses.

There were relatively few completed online surveys received compared to hardcopy completions, and a relatively large number of failed online survey completions (18%). These outcomes suggest that an online survey is not an ideal method for consultation with manufactured home owners in Queensland. As will be discussed in further sections of the report, the respondent group is largely of retirement age (88% aged 65 years or older). This older age group is substantially less likely to use the internet than any other. As recently as 2012-2013, 54% of Australians in this age group reported they had not accessed the internet in the past 12 months\textsuperscript{13}. This obviously contributed to respondent preference for the hardcopy survey.

It is also relevant that the survey asked for information that would have required many respondents to source personal documents to effectively answer (such as site agreements, income details, payment receipts), and relied heavily on items seeking written comments from respondents. These factors likely contributed both to the incompletion rate of the online survey, as well as the preference of respondents for a hardcopy survey which could be completed entirely at the respondent’s convenience.

Terminology

**Respondent** – A respondent is a person who provided a survey with a sufficient number of questions completed to be considered useful for analysis. This was determined by separately considering the number and pattern of missing or invalid responses in the demographic and topical sections of the survey, and by assessing text responses for random text entries or “test” identifiers.

**Household** – Several demographic questions ask for information specific to the respondent (age group, gender) however the remaining questions in the survey ask for information that is taken to represent the details or perspective of the household in which the respondent lives. It is generally assumed that each household completed a maximum of one survey. However it is possible that multiple surveys were received from particular households, most likely completed by different members of the household. It is not possible to estimate the proportion of surveys that are duplicate household responses.

\textsuperscript{13} ABS 8146.0 - Household Use of Information Technology, Australia, 2012-13
Analysis approach

**Response summaries, breakdowns and missing data** – Questionnaire items are analysed and summarised based on the set of respondents who provide a valid response for the item involved. For example looking at respondent gender, the percentages of male and female respondents are calculated relative to the total male and female respondents, excluding invalid or blank gender responses from the calculation. Similarly, for a combined breakdown of two factors such as for example age and gender, comparative figures will be based on the group of respondents providing valid responses to both the age and gender questions, excluding any respondents with an invalid or missing response on either factor.

The majority of survey items show relatively high response rates and the sample is large, so it is not necessary to employ any imputation methods for missing data. The pragmatic approach of simply ignoring missing data and treating results based on the remainder as representative of the respondent sample is judged to be an appropriate approach to analysis.

Note – Component percentages displayed for particular charts may not sum to 100% due to rounding of decimal fractions for display purposes.

**Analysis of comment themes**

*Average response rate: 59%*

Where respondents provided particular responses to six of the questions in the survey, they were invited to provide a follow up comment to enable further analysis of the reasons for their response. Respondents were also asked to provide comments in relation to eight topics that were not related to specific questions, but that were judged to be important aspects of how residents experience residential park living, and how current requirements under the Act might impact on their experience. Respondents were also asked to describe the things they most like about living in a residential park and the things they least like about living in a residential park. 7,215 comments were provided across these sixteen comment topics.

Thematic analysis was employed to capture the predominant issues raised in response to each comment topic for the purposes of summarising and describing salient resident perceptions and concerns.

The style of thematic analysis employed allows conclusions to be made about the relative salience or importance of particular issues or concerns to respondents. Where a respondent describes a topic or issue captured by a theme, it is an indication that (a) it forms part of their experience or perceptions relevant to the comment and (b) it was sufficiently important to them to include in the modest comment space provided. However where a respondent does not address a specific issue, it does not necessarily follow that it does not either form part of their experience or perception, or that it is not important to them – as comments provided will not typically be exhaustive of experience or concerns.

For this reason, while it is appropriate to use theme frequencies to describe the percentage of respondents demonstrably concerned with a specific type of issue, it is not appropriate to use frequencies for the obverse: that is to state that anyone not raising a particular theme is demonstrably not concerned with the type of issue it captures.

Two coders developed sets of emergent themes for each in collaboration. The coders had extensive knowledge both of the Act and of prevailing issues and concerns associated with residential park
living (for example those identified as part of the 2007 review of the Act). Trial theme sets were constructed by reading through selections of comments and creating a theme for each new topic encountered. These themes sets were further re-defined, combined or split based on analysis of comments and subject to agreement between the coders. Comments were re-scored after the final set of themes was chosen. The primary goals of process were that:

- Each identified theme would be sufficiently defined and internally consistent to ensure comments identified as containing that theme would be relevant to its description.
- Each theme could be reliably scored by the two coders evaluating comments independently.
- Each comment would receive a score on at least one theme.
- Each issue or topic common by multiple respondents was sufficiently represented by a theme.

Theme scores were not required to be mutually exclusive, as many respondents raised several issues in any given comment. Comments that dealt with more than one defined theme received a positive score for each theme present. Several comments containing multiple themes can be found amongst the sets of comments included as theme examples.

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14 Both coders rated a random selection of 100 comments for presence or absence of relevant themes for each comment type. The remaining comments were randomly split into two sets and each set was rated by one of the coders. Themes that were present in less than 1% of comments were dropped from the analysis.

The reliability of the scoring process was assessed by comparing coder ratings for the shared set within each comment type. Percentage agreement in scores across all themes for each comment type ranged between 92% and 98%. Percentage agreement is defined as the sum of ratings in agreement divided by all ratings across all respondents for that comment type.
Respondent demographics

**Do respondents live in residential parks?**  
*Response rate: 99%*

99% of respondents live in a residential park. Survey respondents almost exclusively belong to the intended population of manufactured home resident group, so the results of the survey should be relevant to its intent.

**Age**  
*Response rate: 98%*

88% of respondents are aged 65 or older. The largest single age group is the 65 to 74 age group (44%), followed by the 75 to 84 age group (39%). The majority of respondents are of retirement age. This supports existing perceptions that residential parks are increasingly serving as an alternate form of retirement village style living.

The typical age of the respondent group suggests a number of factors relating to disability, illness and ageing will impact on the lives of residents and staff of manufactured home parks.¹⁵

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¹⁵ 51.2% of Queenslanders aged 65 or over (and 66.4% aged 75 or over) have a disability, compared to 12.5% of Queenslanders under 65. 38% of Queenslanders aged 65 or over (and 56.6% aged 75 or over) require assistance with at least one activity (such as self-care, mobility, communication, transport, reading/writing, meal preparation). Around 18% of Queenslanders aged 65 or over are carers, and more often than not those older carers themselves have a disability. Older Australians are also very likely to have a long-term health condition (87%) compared to Australians under 65 (32%). ABS 4430.0 Disability, Ageing and Carers, Australia: Queensland, 2012.
Gender

Response rate: 98%

59% of respondents are female and 41% are male. This difference is greater than expected based on ABS population data, which provides that 53% of Queenslanders aged 65 or over are female\(^{16}\). The base population difference derives from differences in male and female longevity trends.

Gender and age

Response rate: 96%

The majority of respondents within each age group are female. The largest differences in percentages of female and male respondents is seen for the 55 to 64 (69% female, 31% male) and 65 to 74 (60% female, 40% male) age groups. Females aged between 55 and 84 make up 55% of respondents, compared to 38% for males in this age range.

While the difference in average life expectancies for males and females\(^{17}\) would suggest a relatively higher proportion of female respondents should be seen in the older age groups, it may be that age cohort differences in responsibility for survey responding in couple households has an impact. It also may simply be the case that there are more female than male manufactured home park residents, and that a substantial cohort of those female residents is typically younger than their male counterparts.

\(^{16}\) ABS 3235.0 Population by Age and Sex, Regions of Australia.

\(^{17}\) In Queensland females comprise 60% of people aged 80 or over and 54% aged 70 or over. ABS 3235.0 Population by Age and Sex, Regions of Australia.
Living arrangements

Response rate: 98%

57% of respondents reported living with a spouse, while 42% reported living alone and 1% provided in another living arrangement. The other arrangements provided include living with a sibling, parent or child.

Gender and living arrangements

Response rate: 94%

While the majority of respondents are living with a spouse (57%), the single largest group of respondents when gender and living arrangements are considered simultaneously are females living alone (35%). Looking just at the respondents who reported living alone, 83% were female. Of all respondents who reported living with a spouse, 60% were male.

In couple households, 60% of the surveys were completed by males, despite there being fewer male respondents overall. Given that respondents are typically of retirement age, it could be assumed that generational factors (e.g. division of household responsibilities) made it more likely that male partners in couple households would complete the survey on the household’s behalf. Assuming a female partner for each male respondent that lives as a couple\(^{18}\), and vice versa, an estimated 72% of household members in the respondent households live as couples.

The accuracy of this estimate when applied to park residency generally depends on how well the respondent pool represents the relevant population of park residents. The estimate also does not take into account an assumed but unknown proportion of couple households where both partners provided survey responses.

\(^{18}\) Although this does not take into account a proportion of same sex couple households.
Household income

Response rate: 90%

The household incomes of respondents are relatively low compared to the Queensland median ($64,439\textsuperscript{19}). 90% of respondents have a household income of $40,000 or lower. The most common income band for respondents is $20,001 to $40,000 (54%).

The household income results are consistent with the findings that respondents are typically of retirement age, considering that the majority of incomes are compatible with those that would be expected based on the aged pension. In 64% of Australian households where the reference householder is aged 65 and older (a group broadly comparable to the respondent group), government pensions and allowances contribute to 50% or more of the gross household income. That contribution is 90% for 40.6% of these older households\textsuperscript{20}.

The large group of respondents who provide an income level of less than $20,000 (35.8%), and those specifically reporting an income of less than $10,000 group (4.2%) is concerning. The maximum rate single transitional pension\textsuperscript{21} in September 2013 was approximately $18,276 per annum, making the $10,001 to $20,000 a valid income category for single transitional pension recipients. However full rate pensions for singles and couples at the same time were $21,579 and $32,529 respectively, and the transitional rate couples pension was $29,476. For the respondents mostly over 65 who reported lower than $20,000 incomes, it suggests a lack of full eligibility for the pension or other forms of assistance payment, whether based on additional property or financial assets held, citizenship, or other factors. Alternatively it suggests difficulties in interpreting the income question as intended.

It is possible that a number of these income responses were offered in error (checking the wrong box, not viewing government payments as income, not including superannuation payments as income, responding with personal rather than household income, providing an estimate of disposable income or income after rent, or providing a taxable income figure). It is also possible that the respondents have purposefully structured their financial circumstances to minimize reportable income, or their financial arrangements are handled entirely by another party.

\textsuperscript{19} 2011 Census, QLD median weekly household income of $1,235.

\textsuperscript{20} ABS 6523.0 Housing Income and Income Distribution, Australia, 2011-2012.

\textsuperscript{21} The transitional rate of pension is a special rate of pension for people who did not receive a net benefit from changes to the pension system introduced 20 September 2009.
Gender and income

**Gender and income**  
*Response rate: 88%*

Female respondents are more likely to report lower household incomes than male respondents. The high proportion of female respondents who report living alone, and therefore who have a sole source of income will have an impact on this gender difference.

![Figure 16](image)

**Gender and income – singles and couples**  
*Response rate: 87%*

When couple incomes are compared to single incomes for males and females separately, the high proportion of female respondents on low annual incomes is readily apparent. 45% of respondents on incomes of $20,000 or lower are females living alone, while only 5% of respondents with an income of $40,001 or higher are females living alone.

![Figure 17](image)

Age and income

**Response rate: 88%**

The pension age in Australia is currently 65. While the majority of respondents (88%) are aged 65 or over and, depending on other circumstances, therefore eligible to receive the aged pension, the remaining 12% of respondents would typically not be eligible for the aged pension. To assess the comparative incomes of the younger respondent group, age was re-categorised into “retirement” (65 and over) or “pre-retirement” (less than 65) groups.
The income profiles of the retirement and pre-retirement groups are broadly similar; however there are proportionally twice as many pre-retirement respondents in the higher income category ($40,001 and up), and fewer pre-retirement respondents in the common $20,001 to $40,000 income category.

All members (7) of the small group of pre-retirement respondents on less than $10,000 were female, and there are more female respondents who live alone compared to males in all income categories below $40,001 and up, with the most noticeable difference in the $10,001 to $20,000 category.

Rebates and financial assistance

As described in previous sections, respondents are typically living on relatively modest incomes that are presumed to be fixed and based on a mix of pension, and less likely superannuation benefits. The survey sought details from respondents on whether they receive any of the Queensland seniors rebates for electricity, gas, reticulated gas, water or rates, and also whether they receive Commonwealth Government Rent Assistance. The results suggest that in addition to their primary fixed income, respondents are also heavily reliant on rebates or special purpose assistance payments.

Queensland Seniors Electricity Rebate
(Response rate: 94%)

88% of respondents receive the Queensland Seniors Electricity Rebate, which is currently $282.54 per annum.

Other rebates received
(Response rate: 94%)

- Water rebate: 15%
- Rates rebate: 12%
- Gas rebate: 6%
- Reticulated Gas rebate: 3%
- Other rebates: less than 2% of respondents report receiving either or both of the car registration rebate and telephone rebate.

Commonwealth Government Rent Assistance
(Response rate: 95%)

89% of respondents receive Commonwealth Government Rent Assistance for their residential park site rent. Based on rent paid, living arrangements, and reported rent assistance eligibility, the estimated average fortnightly rent assistance contribution for single respondents is $116, and for couple respondents it is $79, for an overall average of $95. Respondents with an income of $40,000 or less are far more likely to be receiving rent assistance (92%) than those with an income of more than $40,000 (60%), which is probably a direct result of pension or other support payment eligibility.

Respondents who receive rent assistance are more likely to have purchased homes under $200,000 (47%) than over $300,000 (23%), while respondents who do not receive rent assistance are more likely to have purchased homes over $300,000 (38%) than under $200,000 (32%). There is an

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22 Maximum payment $124 (p/fn) for singles, $116.6 (p/fn) for couples as at September 2013.
apparent difference in average site rents for respondents receiving rent assistance ($292 p/fn) and not receiving rent assistance ($285 p/fn), however this difference is not statistically significant.

Comment: Why do respondents not receive the Queensland Government Electricity Rebate?

Response rate: (overall – 14%, relative to answer for related question: no – 82%, yes – 2%, blank – 12%).

Respondents answering that they did not receive the Queensland Government’s electricity rebate were asked to provide the reason why.

109 respondents provided a comment for this question, with some comments provided by respondents who had answered other than ‘no’ to the lead-in question. 12% of commenting respondents indicated they received the rebate, the remainder indicated that they did not (82%), or had not answered the related question (6%).

Ineligibility whether due to the respondent being not a senior (6%), not receiving the pension (12%), or being otherwise ineligible (7%) was the most frequent reason provided for not receiving the electricity rebate (combined 25%).

16% of comments described how respondents received commercial/bulk rate electricity purchased by the park owner. Several respondents had been advised by park management that it is too difficult to calculate the rebate in these circumstances.

...Management won’t organise it, as they receive bulk electricity and residents have no number to claim a rebate, management used to work it out but ceased in 2011.

...Park owners buy bulk electricity, these bills are very satisfactory.

General refusal to participate in the scheme by park operators is the second most frequent reason provided by respondents (15%).

...Owners will not complete necessary paperwork.

...Park owner does not want to participate in voluntary scheme.

Some respondents were not sure why or if they were not receiving the rebate, or it was not clear from their comment the reason they were not receiving the rebate (13%).

...Electricity charges need to be looked at, and explained to us.

...Don’t know reason why.

A reliance on solar power/heating, or billing complications arising from solar power was provided in 12% of comments as a reason for not receiving the rebate.

...Management refuse to collect it for residents, especially as a majority of residents have installed solar power, this reduces the amount of power we have to purchase from the park.

...We have solar hot water and solar panels.
10% of comments described how the park operator had ceased to participate in the scheme after either a dispute outcome relevant to charging of additional utility fees (e.g. meter reading fees), or the likely related introduction of section s.99A that limits utility charges to costs of supply. A further 7% of comments provide that the park operator has threatened to cease participation (perhaps for similar reasons – although that is not clear).

...The park ceased paying the rebate 7 months after s.99A became part of the Act. Park owner has threatened on a number of occasions to cease applying for this.

### Table 1 – Reasons why respondents do not receive the electricity rebate

<table>
<thead>
<tr>
<th>Theme</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commercial/bulk rate</td>
<td>Park owner supplies electricity, paying commercial/bulk rate – won’t pass on rebate too hard to calculate</td>
<td>16%</td>
</tr>
<tr>
<td>Refusal - general</td>
<td>Refusal to participate in scheme, will not fill in forms/spare staff time</td>
<td>15%</td>
</tr>
<tr>
<td>Unsure</td>
<td>Unclear why/if rebate not being passed on</td>
<td>13%</td>
</tr>
<tr>
<td>Not receiving the pension</td>
<td>Ineligible - not pension recipient</td>
<td>12%</td>
</tr>
<tr>
<td>Use solar</td>
<td>Solar power/hot water in use, reduced consumption, feed-in issues</td>
<td>12%</td>
</tr>
<tr>
<td>Refused - service fee</td>
<td>Refusal to participate in scheme after s.99A brought in (utility on-supply at cost of supply only), no reading fee no rebate</td>
<td>10%</td>
</tr>
<tr>
<td>Otherwise ineligible</td>
<td>Ineligible other than not pensioner/senior</td>
<td>8%</td>
</tr>
<tr>
<td>Threatened withdrawal</td>
<td>Park owner has threatened withdrawal from scheme</td>
<td>7%</td>
</tr>
<tr>
<td>Not a senior</td>
<td>Ineligible - not a senior</td>
<td>6%</td>
</tr>
<tr>
<td>Other</td>
<td>Just started receiving, rebate is claimed by park owner</td>
<td>4%</td>
</tr>
<tr>
<td>Negotiation underway</td>
<td>Negotiations/arrangements to receive rebate progressing</td>
<td>2%</td>
</tr>
<tr>
<td>Local government</td>
<td>Claimed local government does not participate</td>
<td>1%</td>
</tr>
<tr>
<td>Was not aware</td>
<td>Not aware of the rebate</td>
<td>1%</td>
</tr>
<tr>
<td>Supplier not participating</td>
<td>Claimed energy supplier ceased participating in scheme</td>
<td>1%</td>
</tr>
</tbody>
</table>

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23 Section 99A of the *Manufactured Homes (Residential Parks) Act 2003* prohibits a park owner from charging the home owner more than the amount charged to them by the utility supplier, if the home is separately metered.
Low-income respondents

Response rate: 86% (complete information on age, gender, living arrangements, income)

Female respondents are more likely to report lower household incomes than male respondents. The relatively high proportion of female respondents who report living alone, and therefore who have a sole source of income is a primary contributor to this gender difference (see Gender and living arrangements).

Very low income ($10,000 or less)

60% of the 35 respondents who reported a very low annual income of less than $10,000 are living alone. 51% of very low income respondents are females who live alone. The age distribution of the very low income group is broadly comparable to that of the entire respondent sample, with the majority aged 65 or over (80%). While the average age for the group is slightly lower than that of the remainder of respondents, 89% of whom are aged 65 or older, the reliability of the age breakdown for the very low income group is limited given the small number of respondents involved.

Low income ($20,000 or less)

The characteristics of the respondents who report a low annual income of $20,000 or less (36%) is similar to the very low income group. 55% of the respondents in this group live alone, 43% live as couples, and 2% live in another arrangement. 86% of the low income respondents living alone are female.

Half of all low income respondents are females living alone (47%), in contrast to males living alone who comprise only 8% of the low income respondent group. Within the low income group, for every male living alone there are six females living alone, and approximately six couples. In contrast within the higher income group ($40,001 and over), for every male living alone there is one female living alone, and 16 couples.

The age distribution for the low income group is comparable to that of the broader respondent group, with 88% of low income respondents aged 65 or older.

The average price paid for homes (adjusted to 2013 dollars) by the low-income group ($222,000) is substantially lower than that for the middle ($252,000) and upper income groups ($320,000)\(^\text{24}\). Results also show that more low income respondents more often report having lived in their park for 10 or more years (26%), compared to the middle (23%) and upper (14%) income groups, while they less often report having moved into their park in the last two years (14%) compared to the upper income group (26%). Low income respondents are relatively more likely to live in mixed use as opposed to purpose built parks, with 20% of low income respondents living in mixed use parks, compared to 13% of the mid income group, and 9% of the upper income group.

\(^{24}\) Means based on assuming price equal to the average of the range represented by the category chosen.
**Park characteristics**

**Does the park have an on-site manager?**

(*Response rate: 97%*)

88% of respondents live in a park with an on-site manager.

**Park type**

(*Response rate: 98%*)

The majority of respondents (87%) live in a park that is purpose built – these parks only contain manufactured homes. Mixed use parks provide both sites for long-term residency of manufactured homes, as well as sites for caravans or other forms of short-term accommodation.

**Park type by residency duration**

(*Response rate: 97%*)

Respondents who have been living in their park for 10 years or more are relatively more likely to be living in a mixed use park (Figure 20). These results suggest that purpose built parks comprise the majority of manufactured home sites, and that the proportion of all sites that are in mixed use parks is diminishing over time.
**Park size**  
*(Response rate: 96%)*

Most respondents live in parks with 151 or more homes (70%). 38% live in parks with between 201 and 300 homes. The proportions of respondents living in parks of different sizes is very similar to those based on estimates from the department’s register of Queensland residential parks.

![Figure 21](image)

**Park size by residency duration**  
*(Response rate: 95%)*

If parks are getting bigger over time through either expansion of existing parks, or the development of new larger parks, a relationship might be expected between duration of residency and the size of the park a resident lives.

In line with that expectation, the proportions of shorter-term (<5 years) and longer-term (>10 years) respondents do appear to vary somewhat based on the size of the respondent’s park (Figure 22).

The percentage difference between shorter and longer term residents in small parks is only 5%, while for other park sizes the difference is 22% or over.

![Figure 22](image)
Responses by location

The majority of respondents live between the Gold and Sunshine Coasts, with a high concentration in the South Brisbane and Logan area. The intensity of the coloured overlay on the maps in Figure 23 and Figure 24 indicates the prevalence of responses from specific postcodes. Locations are based on geometric centres of postcode areas, and do not correspond precisely to the location of any individual manufactured home park.
Figure 24 – Heat map of response counts by postcode (entire regional range of responses)
Response rates by region

The survey response rate across regions is calculated by comparing the number and location of residential parks listed on the Department of Housing and Public Works residential park register to the number of survey responses received by postal area.

Table 2 provides the number of parks, home sites, survey responses, and response rate by Queensland district. The 168 registered residential parks in Queensland comprise an estimated 14,084 home sites. 5.8% of all possible sites responded to the survey. This estimate does not take into consideration the likelihood that a number of households completed multiple surveys, or the likelihood that there were a significant number of vacant sites when the survey was conducted. In any case the fact that more than one in every 20 households responded to the survey reveals a high level of engagement by residents with the survey, and in general substantial interest in the Act that regulates the operation of their residential parks.

Response rates by district vary considerably. The Brisbane South district has an estimated 266 residential park home sites, and an estimated 33.6% of park households living in this district responded to the survey. The response rate from the Carindale sub-district was particularly high at 48%.

The Logan-Beaudesert district is the largest in terms of number of residential park home sites, with 23% of residential park sites located in this district. While the response rate of 9.8% is lower than Brisbane South, the Logan-Beaudesert district is the single largest source of survey responses, at 38% of all responses received. The majority of these were from the Loganlea-Carbrook area.

Substantial numbers of responses were received from the Gold Coast, Moreton Bay – North, Sunshine Coast and Wide Bay districts. The Gold Coast is notable in that while it contains an estimate 2,898 home sites, the response rate for this district was a relatively low 3.2%. Similarly, only 3.3% of the estimated 1,718 households situated in the Sunshine Coast, and only 1.4% of the 361 households situated in the Cairns district, participated in the survey.

In all, 50% of surveys were received from residents of the comparatively small though populous section of South-East Queensland comprising the Brisbane South and Logan–Beaudesert districts. A full breakdown by sub-district is not provided to protect the privacy of respondents from sub-districts that contain very few home sites.

---

25 Districts used are SA4 regional categories of the Australian Bureau of Statistics’ Australian Statistical Geography Standard (ASGS), and sub-districts are SA3 regional categories. This ASGS scheme is hierarchical: State -> SA4 -> SA3 -> SA2 -> SA1. ABS Postal Area Concordances (cat 1270.0.55.006) were used to match park and respondent post codes to ASGS regions.

26 Considering the set of 816 surveys that provided a postcode matching the postcode of a residential park listed on the registry.

27 Multiple household responses would contribute to overestimating the response rate, while vacant sites would contribute to underestimating the response rate.
### Table 2 Response rate by region

<table>
<thead>
<tr>
<th>District (ASGS SA4)</th>
<th>Home parks</th>
<th>Home sites</th>
<th>Responses</th>
<th>Response rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brisbane - East</td>
<td>4</td>
<td>320</td>
<td>3</td>
<td>0.9%</td>
</tr>
<tr>
<td>Brisbane - North</td>
<td>2</td>
<td>280</td>
<td>29</td>
<td>10.4%</td>
</tr>
<tr>
<td>Brisbane - South</td>
<td>4</td>
<td>265</td>
<td>89</td>
<td>33.6%</td>
</tr>
<tr>
<td>Brisbane Inner City</td>
<td>1</td>
<td>5</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Cairns</td>
<td>7</td>
<td>361</td>
<td>5</td>
<td>1.4%</td>
</tr>
<tr>
<td>Darling Downs - Maranoa</td>
<td>5</td>
<td>295</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Fitzroy</td>
<td>14</td>
<td>337</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Gold Coast</td>
<td>18</td>
<td>2898</td>
<td>93</td>
<td>3.2%</td>
</tr>
<tr>
<td>Ipswich</td>
<td>11</td>
<td>976</td>
<td>39</td>
<td>4.0%</td>
</tr>
<tr>
<td>Logan - Beaudesert</td>
<td>18</td>
<td>3183</td>
<td>312</td>
<td>9.8%</td>
</tr>
<tr>
<td>Mackay</td>
<td>4</td>
<td>8</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Moreton Bay - North</td>
<td>10</td>
<td>1478</td>
<td>82</td>
<td>5.5%</td>
</tr>
<tr>
<td>Moreton Bay - South</td>
<td>2</td>
<td>40</td>
<td>5</td>
<td>12.5%</td>
</tr>
<tr>
<td>Queensland - Outback</td>
<td>7</td>
<td>50</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Sunshine Coast</td>
<td>24</td>
<td>1718</td>
<td>57</td>
<td>3.3%</td>
</tr>
<tr>
<td>Toowoomba</td>
<td>4</td>
<td>443</td>
<td>35</td>
<td>7.9%</td>
</tr>
<tr>
<td>Townsville</td>
<td>8</td>
<td>45</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Wide Bay</td>
<td>25</td>
<td>1382</td>
<td>67</td>
<td>4.8%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>168</strong></td>
<td><strong>14084</strong></td>
<td><strong>816</strong></td>
<td><strong>5.8%</strong></td>
</tr>
</tbody>
</table>
Reasons for living in a manufactured home park

Retirement village considerations
(Response rate: 98%)

36% of respondents reported they had considered moving into a retirement village prior to deciding to live in a residential park. Almost half of the 85 years and older age group had considered retirement village living, while the younger age groups were less likely to have considered retirement village living.

Reasons for choosing a manufactured home
(Response rate: 90%)

Respondents were asked to select the reasons why they choose to live in a residential park from a set of options provided:

- ‘More affordable’
- ‘No exit fee’
- ‘Potential capital gain’
- ‘Site agreements compared to retirement village contracts’
- ‘Better facilities’

Respondents were able to select multiple reasons. The majority of respondents choose to live in a residential park at least in part because there is no exit fee (65%). 57% based their choice at least in part on residential park living being more affordable. Each of the remaining reasons (better facilities, site agreements preferred to retirement village contracts, potential capital gain) contributed to the choice to live in a residential park for close to 30% of respondents.

31% chose a single reason for choosing to live in a residential park, while 58% chose 2 or more reasons. For 38% of respondents the choice was based (at least in part) on no exit fee and affordability considerations. 27% of respondents listed both no exit fee and potential capital gain as considerations. 10% of respondents provided no reason for choosing residential park living.

It should be noted that this question was intended to capture respondent motivations for living in a manufactured home park as compared primarily to a retirement village. There is little overlap between the results of this question, which posed a fixed set of options of relevance to a comparison
between residential park and retirement village living, and the results of the thematic analysis of what respondents most like about living in a residential park.

**Home and residency characteristics**

**Year of home purchase**

*(Response rate: 90%)*

The majority of respondent’s homes have been purchased relatively recently. 87% of homes were purchased in 2002 or later while just over half have been purchased in 2008 or later. More homes were bought in the three years from 2008 to 2010 than any other comparison period.

**Purchase Price and Year of Purchase**

*(Response rate: 88%)*

The price respondents pay for their homes has risen substantially in the last decade. Prior to 2002, the majority of homes were purchased for $100,000 or less. During the period from 2002 to 2004, the most frequent home price was from $100,001 to $200,000, while after that period the majority of homes were purchased for $200,001 or more. It should be noted that these prices are not adjusted for inflation.

**Table 3 Home purchases by year**

<table>
<thead>
<tr>
<th>Year</th>
<th>% by Year</th>
<th>Cumulative %</th>
<th>Number of Purchases</th>
</tr>
</thead>
<tbody>
<tr>
<td>Before 1987</td>
<td>0.3%</td>
<td>0.3%</td>
<td>3</td>
</tr>
<tr>
<td>1987-1989</td>
<td>0.7%</td>
<td>1.0%</td>
<td>6</td>
</tr>
<tr>
<td>1990-1992</td>
<td>0.7%</td>
<td>1.7%</td>
<td>6</td>
</tr>
<tr>
<td>1993-1995</td>
<td>1.7%</td>
<td>3.4%</td>
<td>15</td>
</tr>
<tr>
<td>1996-1998</td>
<td>1.7%</td>
<td>5.1%</td>
<td>15</td>
</tr>
<tr>
<td>1999-2001</td>
<td>8.0%</td>
<td>13.0%</td>
<td>71</td>
</tr>
<tr>
<td>2002-2004</td>
<td>15.7%</td>
<td>28.8%</td>
<td>140</td>
</tr>
<tr>
<td>2005-2007</td>
<td>18.1%</td>
<td>46.9%</td>
<td>161</td>
</tr>
<tr>
<td>2008-2010</td>
<td>31.9%</td>
<td>78.8%</td>
<td>284</td>
</tr>
<tr>
<td>2011-2013</td>
<td>21.2%</td>
<td>100.0%</td>
<td>189</td>
</tr>
</tbody>
</table>

**Table 4 Home purchases by year and price band – relative %**

<table>
<thead>
<tr>
<th>Year</th>
<th>$100,000 or less</th>
<th>$100,001 to $200,000</th>
<th>$200,001 to $300,000</th>
<th>$300,001 to $400,000</th>
<th>$400,001 to $500,000</th>
<th>$500,001 to $600,000</th>
<th>$600,001 to $700,000</th>
</tr>
</thead>
<tbody>
<tr>
<td>Before 1987</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1987-1989</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1990-1992</td>
<td>80%</td>
<td>20%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1993-1995</td>
<td>93%</td>
<td>7%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1996-1998</td>
<td>93%</td>
<td>7%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1999-2001</td>
<td>71%</td>
<td>26%</td>
<td>3%</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2002-2004</td>
<td>33%</td>
<td>56%</td>
<td>11%</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2005-2007</td>
<td>6%</td>
<td>33%</td>
<td>46%</td>
<td>14%</td>
<td>2%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2008-2010</td>
<td>5%</td>
<td>12%</td>
<td>42%</td>
<td>37%</td>
<td>3%</td>
<td>1%</td>
<td></td>
</tr>
<tr>
<td>2011-2013</td>
<td>5%</td>
<td>20%</td>
<td>33%</td>
<td>32%</td>
<td>9%</td>
<td>2%</td>
<td></td>
</tr>
</tbody>
</table>

**Overall % by price band**

<table>
<thead>
<tr>
<th>$100,000 or less</th>
<th>$100,001 to $200,000</th>
<th>$200,001 to $300,000</th>
<th>$300,001 to $400,000</th>
<th>$400,001 to $500,000</th>
<th>$500,001 to $600,000</th>
<th>$600,001 to $700,000</th>
</tr>
</thead>
<tbody>
<tr>
<td>19.1%</td>
<td>25.3%</td>
<td>30.7%</td>
<td>21.0%</td>
<td>3.2%</td>
<td>0.5%</td>
<td>0.2%</td>
</tr>
</tbody>
</table>
To gain a more accurate picture of changes in home prices, inflation must be taken into account, and historical house prices converted to a standard reference dollar value. Given that the respondents completed the survey in 2013, inflation adjustment to a 2013 dollar value was chosen for this purpose. To generate a single value price for homes to enable adjustment to 2013 dollar values, the mid-point of each price band was chosen as an estimate of the price paid for a home. These price estimates were then converted to 2013 dollar values based on the midpoint of each price band as the estimated house price regardless of purchase year. For the $100,000 or less price band a lower bound of $30,000 was chosen, making the mid-point for that band $65,000.

Purchase price in equivalent $2013
(Response rate: 88%)

Figure 27
Reserve Bank of Australia’s inflation calculator\textsuperscript{29}.

This comparison shows that manufactured home prices have risen substantially in the last decade; even when historical prices are expressed in terms of today’s dollars. Average prices for homes purchased since 2009 are approximately twice that of homes purchased in 2002 or earlier. This is consistent with the results of a previous survey of Queensland manufactured home owners conducted in 2007\textsuperscript{30}. That report estimated that homes were typically purchased for between $30,000 and $110,000 prior to 2002, while by 2006 prices had increased to between $150,000 and $250,000.

The increase in average home prices can be attributed largely to the increasing size, sophistication and feature set of contemporary manufactured home offerings, compounded by the tendency for modular home constructions to be somewhat more expensive than similar project home construction\textsuperscript{31}. Manufactured homes with 5 or more bedrooms, multiple living areas, en-suites and integrated outdoor areas are offered by a number of manufacturers, and the price of these homes is considerably greater than the earlier cohort of manufactured homes still common to many residential parks in Queensland.

\textit{Was the home purchased onsite or moved into the park?}
(\textit{Response rate: 63%})

93\% of respondents either bought or built their manufactured home in the residential park they live in. Only 7\% moved their current home into their park. This supports perceptions that while manufactured homes are able to be relocated, they are typically built in and remain within a single park.

\textit{Who was the home purchased from?}
(\textit{Response rate: 92%})

64\% of respondents purchased their manufactured home from the park owner or manager, 34\% purchased from a departing resident, and 2\% indicated other options including estate agent, deceased estate, built new or relative as the seller of their home.

<table>
<thead>
<tr>
<th>Site agreements</th>
</tr>
</thead>
<tbody>
<tr>
<td>\textit{Type of site agreement}</td>
</tr>
<tr>
<td>(\textit{Response rate: 91%})</td>
</tr>
</tbody>
</table>

93\% of respondents have a site agreement under Manufactured homes (Residential Parks) Form 2, while 7\% do not have a site agreement of that type. Respondents who do not have a Form 2 site agreement are:

\begin{itemize}
  \item \textit{Unknown reasons (1\%)}
  \item \textit{Agreement not required (3\%)}
  \item \textit{Agreement in process (5\%)}
\end{itemize}

\textsuperscript{29} This tool calculates the change in cost of purchasing a representative ‘basket of goods and services’ over a period of time and is based on CPI data by year. The tool can be used to convert a dollar value in a particular year to its equivalent value in another year.

\textsuperscript{30} Outcome Report of the Review of the \textit{Manufactured Homes (Residential Parks) Act 2003}.

\textsuperscript{31} Manufactured Homes for Moderate Income Groups Market and Product Potential Study – Landcom 2002.
agreement paid less for their manufactured homes than those who do: 77% of respondents who do not have a Form 2 site agreement bought their homes for $200,000 or less (42% under $100,001), compared to only 41% of respondents with a Form 2 site agreement who bought their homes for $200,000 or less (17% for under $100,001).

**Was legal or financial advice sought before signing the site agreement?**
*(Response rate: 95%)*

Respondents were asked if they obtained legal or financial advice before signing their site agreement. Of those who answered, 43% had obtained advice. 79% of these respondents reported that advice they received was useful.

Interestingly, 69 respondents stated they did not obtain legal or financial advice, yet still answered the question about whether advice was useful. 78% of these respondents reported that advice received was not useful, which contrasts with the mostly useful advice received by those who actually reported obtaining advice.

Respondents may have chosen to use this question to describe the usefulness of types of advice other than legal or financial advice, or advice received when entering into a previous site agreement (for example the advice of a park employee, home owner, real estate agent, department website etc.). Respondents might also have used this question to express general dissatisfaction with site agreements and the availability or quality of advice relating to site agreements.

**Was the site agreement assigned by the previous owner?**
*(Response rate: 97%)*

The issue of assignment is relevant for the group of respondents who bought their home from a previous resident (34% of respondents). 36% of respondents in this group were assigned the site agreement of the departing resident, while 16% were unsure whether the site agreement was assigned.
Does the site agreement have a CPI rent increase clause?
(Response rate: 97%)

The overwhelming majority of respondents with site agreements report that their site agreement includes an annual CPI increase (96%). 3% of respondents have site agreements with no CPI increase mechanism, while under 1% provided custom responses to the question to indicate that the increase was a fixed 5% annually, or the greater of 4% or CPI annually. It should be noted that the term ‘CPI increase’ is generally used by park residents to refer to formula that use either a CPI based, fixed rate, or greater of CPI or fixed rate annual site rent increase. Results discussed in further sections provide some evidence either that fixed rate increases are relatively common, or that market review or other non-formula increase bases have had a substantial impact on site rent increases, given increase trends substantially above CPI levels.

Does the site agreement have a market rent clause?
(Response rate: 87%)

73% of respondents have a site agreement that includes a ‘market rent review’ or ‘review to market’ clause.

Market rent review frequency
(Response rate: 74%)

60% of respondents with site agreements subject to market rent review report that these reviews occur at least once every three years. Specific market review intervals of 3 years (41%) and 5 years (28%) are most common.

![Market review frequencies](image-url)
**Satisfaction with market rent review clause of site agreement**
*Response rate: 83%*

64% of respondents with market rent reviewable site agreements are not satisfied with how their site agreement provides for market rent reviews. 35% are satisfied with how site agreements provide for market rent review while just under 1% are not sure if they are satisfied or not satisfied.

Respondents were not asked how satisfied they were with CPI or fixed % rate increase terms in their site agreements. However the single most common theme for comments on “**Increases in site rent and market rent reviews**” was that CPI increases are a fair and appropriate mechanism for site rent increase (29%), while in contrast many respondents specifically mentioned dissatisfaction with market review increases (19%). This supports a perception that relatively stable increases based on CPI are far more acceptable to manufactured home owners than market review based increases. Market review increases are far less predictable, and the means by which the increases are likely to be less transparent.

**Satisfaction with special terms of site agreement**
*Response Rate: 79%*

60% of respondents with site agreements are satisfied with the special terms of their agreements, while 40% are not satisfied.

---

**Site agreements –financial considerations**
*Response rate: 91%*

Respondents were asked to provide the site rental payable for their current residence at the time they first began living there, and the site rental for same at the time they completed the survey.

The average fortnightly site rent for respondents is $292. While there are small variations in this average when considered at different durations of residency, the average site rent currently payable by respondents does not appear to be related to their duration of residency. That is, there is no trend indicating either shorter or longer term residents currently pay different levels of site rent on average.

Estimates of the effective annual percentage increases in site rental were calculated based on duration of residence and initial and current site rents per respondent.

---

32 This estimates the percentage by which site rent would need to increase each year (compounding increases as per usual site rent increase formula) based on residency duration, starting site rent, and current site rent.
Across all residency durations, site rents rose an average of 4.5% annually. For the 210 respondents who had lived ten or more years in their park, the average annual increase rate was 5.1%.

Figure 31 provides the average increases in site rent, Brisbane all groups CPI, the CPI Rental Index, and the single aged pension from previous points in time to December 2013. As a guide to interpreting the chart, it shows for example that for respondents who had lived in their homes for 11.5 years at the time of the survey, site rents had increased across their residency by 97%, CPI had increased by 41%, the Rental index had increased by 72%, and the maximum rate single pension had increased by 94%. The increases observed across different residency durations suggest that site rents on average rise at rates substantially higher than Brisbane CPI. Site rents have also risen at a higher rate than the Brisbane Rental Index, when considering shorter term residents and residents who have lived more than 10 years in their park.

While most site agreements include a mechanism allowing for site rental increases based on CPI, the estimated increases are substantially above that expected based on CPI alone. It is likely that other sources of site rental increase such as market review mechanisms, and fixed rate increases at a level

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33 For CPI and Rental Index (Both 2013 ABS Brisbane time series releases), September/December 2013 average used as current value and average across financial year lagged by residency duration (e.g. Sept-2011 to June-2012 avg. for 1.5 years) used as base value for calculating % increases. For the 0.5 duration, the average Dec-2012/Mar-2013 value was used as base. Results are near identical if lagged un-averaged quarterly indexes are used. Averages of increase across relevant durations (weighted by number of respondents at each residency duration) used for calculation of the average 15.5 and up index increases.

34 ABS Rental Index for Brisbane (December 2013). The Rental index is part of the (CPI) and represents the change in cost of this type of good from period to period.
above CPI have contributed to higher site rent increase rates in some parks, which is reflected in the estimated above CPI rate.

The majority of park residents (at least based on survey respondent profiles) are on modest fixed incomes based on the aged pension and related supplemental sources of financial assistance. The primary pension component is indexed bi-annually to at least match 25% of average male earnings (proportional for couples pensions). Increases in the pension (Figure 31 provides increases in full single aged pension) have kept pace with or exceeded average site rent increases across all reference residency durations. This comparison does not take into account the impact of eligibility, deeming, or means test changes to the pension over time (for example the substantial changes made in 2009-2010), and is based on receipt of full pension. It should also be noted that the estimated increase across parks is an average figure and that many respondents have experienced either substantially lower or substantially higher rates of increase.

The trend line for percentage increase over residency duration is remarkably stable given it comprises point averages for distinct groups of respondents. The upper and lower bounds of the 95% confidence interval for average site rent increase percentages is provided in Figure 31.

It is reasonable to assume that for parks where growth in site rent increases had challenged growth in fixed incomes, residents would be more motivated to take part in the survey. Income stress concerns are specifically raised in substantial numbers of the comments, primarily the 26% of comments to the 
“Increases in site rent and market rent reviews?” item stating that site rent amounts or increases are too high.

This raises the possibility that estimates of site rental increases based on the respondent sample could overestimate the increases experienced by the broader group of residential park residents in Queensland, if it assumed that dissatisfied home owners are more likely to respond.

The potential for that effect can be investigated in part by comparing site rent increase rates, and current site rent amounts against responses to the broad satisfaction measures: “Do you believe the Act is achieving its aims?” and “Do you believe the Act offers adequate consumer protection for manufactured home owners?”. This assumes that higher site rents and rent increases would affect satisfaction in the same way it might affect likelihood of responding to the survey.

The comparison reveals that for the consumer protection question there are weak significant differences for both current site rent amount and increase rate. Differences for the Act achieving objectives question were not significant.

The effect sizes for these tests are very low, and in the case of increase rates, the rate for ‘yes’ responses is comparable to the rate for ‘not sure’ responses. Even assuming a much higher rate of

35 Based on ANOVA for both current site rent amount (F(2,865) = 5.29, p<0.05), and increase rate ( F(2,725) = 5.16, p<.05). Respondents answering ‘no’ (5.0%) on average have higher increase rates than those answering ‘not sure’ (4.0%) and those answering ‘yes’ (4.2%). The averages for site rent payable are ‘no’ ($299), ‘not sure’ ($288) and ‘yes’ ($278).

36 only 1.4% of variability in increase rate is accounted for by response to the consumer protection question.
survey completion by broadly ‘dissatisfied’ respondents, the impacts on estimates of site rent increases are not likely to substantial\textsuperscript{37}.

### Affordability

The range of reported respondent household incomes is relatively restricted, with 90% of households on an annual income of $40,000 or less. Despite that, it could be reasonably expected that the distribution of site rents payable by respondents would differ across income groups, where prospective residents choose parks based on capacity to pay a given rate of site rent, or willingness to pay more for a particular home, locale or set of park features.

However the distribution of site rents payable is almost identical for respondents in lower, middle and upper income groups. This may in part be due to the longer average residency duration reported by lower income respondents, which provides greater scope for annual compounding increases in site rent (including market rent review increases) to contribute to present site rent. The effect of parks where costs of utility provision are incorporated into site rent may also contribute, assuming these are likely to be older parks.

![Current site rent distribution by income groups](image_url)

**Figure 32**

\textsuperscript{37} That assessment is of course, based on comparisons of subgroups of the very sample in question.
The Queensland Department of Housing and Public Works defines affordable rent for households in the lowest 40% of the income distribution as:

\[
\frac{(Rent - Rent Assistance)}{Gross Weekly Household Income} \times 100 \leq 30\%.
\]

It should be noted that this index is primarily designed to assess the affordability of rent paid for established residential accommodation. It is unclear whether the 30% threshold is also valid or appropriate for rent paid for the service offered by a residential park: that is site occupancy combined with ongoing access to facilities, activities and services.

Assuming a single aged pensioner on the full pension, and receiving full rent assistance, the 30% affordability threshold would be approximately $372 per fortnight at September 2013 (including clean energy supplement and pension supplement). For a couple receiving the full pension and maximum rent assistance, the threshold would be $491.

This pension based threshold is exceeded by 27 (8%) of the 353 site agreements reported by single respondents, and by 6 (1%) of site agreements reported by couple respondents (474). It should be noted that half of the respondents living alone with a site agreement above the pension threshold reported an income of $20,000 or less, which is less than the September 2013 full pension rate upon which the threshold is based.

Precise calculation of an affordability index for each respondent’s household is limited by the survey’s use of a categorical income assessment question. The amount of rent assistance respondents receive can be reliably estimated.

To provide a range of affordability estimates per respondent, the mid-point, lower bound, and upper bound of each income category are used to calculate ‘min income’, ‘mid income’ and ‘max income’ affordability estimates. Respondents reporting incomes of higher than $40,000 were excluded as these are less likely to be in the lowest 40% of the income distribution. Given the expected reliance by a majority of the respondents on the full aged pension, estimates based on pension rates for singles and couples are also included.

The analysis shows that if pension incomes are assumed, the 15-19% affordability index range is most common (67% of site rents for the subsample), and only 4.5% of rents would be beyond a 30%

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38 Excluding cases for which income and living arrangements are not available - response rate overall: 83%.

39 Rent assistance amounts can be estimated as respondents provide information about the rent they pay, whether they live alone or as a couple, and whether they receive rent assistance. Rent assistance amount determined by applying the Department of Human Services formula for rent assistance: 75 cents in the dollar for rent paid above the qualifying threshold, cutting off at the maximum payment threshold, threshold and cutoff specified separately for sole or couple recipients – values as at September 2013 used.

40 Providing bounded and mid-point estimates for the under $10,000 income group is difficult, as this income level, particularly for respondents mostly over 65, suggests an almost complete ineligibility for the pension or other forms of assistance payment, and a lack of any source of alternative income. Min, mid and max points of $5000, $10000 and $15000 are used for this category for want of any better form of estimation.

41 Pension rates at September 2013 used. It should be noted that for the up to $10,000 and $10,001 to $20,000 income groups, using pension rate provides an estimate of income substantially higher than the income the respondents reported through the survey (single pension $21,579, couples pension $32,529).
affordability indexed. Assuming ‘mid income’ the same range of affordability is most common. However there are also noticeable concentrations around 25-29% and 35-39%. These are mostly comprised of respondents from the income groups under $20,000. The ‘max income’ assumed estimates show that only the very lowest income groups approach an affordability index of 30% or over. If ‘min income’ is assumed, 47% of respondents are beyond the 30% affordability threshold.

The analysis suggests that if the household incomes provided by respondents are accurate, there could be substantial numbers of low income households paying site rent beyond a 30% affordability threshold. If instead maximum pension rate incomes are assumed, at least 95% of respondents’ rents are below the affordability threshold.

![Affordability index - income ranges for households with income under $40,001](image)
Home purchases and sales

Who was the home purchased from?
(Response rate: 92%)

64% of respondents bought their current home from the park owner or manager, while 34% purchased from a departing park resident. Other home vendors provided include real estate agents (<1%), relatives (<1%), deceased estates (<1%), and manufactured home builder (<1%).

Homes on the market
(Response rate: 95% - of respondents currently selling a home)

9% of respondents were trying to sell their home at the time of the survey. More than 50% had been trying to sell for at least more than one year, while 31% had been trying to sell for two years or more.

The sale time for pre-owned manufactured homes is considerably longer than sale times for other forms of residential accommodation in Queensland. By way of contrast, the average time to sell a house in Brisbane in October 2013 was 66 days.\(^{42}\)

Previous Home Sales
(Response rate: 27%)

The majority of respondents did not complete the question “Have you sold a manufactured home?” due to a typographical error which directed respondents to skip the question if they were not currently trying to sell their manufactured home. As a result, only 21% of the respondents who were not currently trying to sell a home answered this question.

12% of those responding had previously sold a manufactured home. Respondents who were not currently selling a home were relatively more likely to have sold a home previously (14%) compared to respondents currently selling a home (9%). This result would appear to be consistent with the conclusion that having sold one home, a person is less likely at the time of the survey to be selling another. It is unlikely there are significant numbers of people who frequently buy and sell

manufactured homes for short-term residency and re-sale, compared to other forms of accommodation.

Where respondents had paid someone to help them sell their home, they had most often paid a real estate agent (61%), followed by the park owner or manager (38%). 66% of these homes sold for between $100,001 and $300,000.

**Does the Act provide adequate provision for the sale of a manufactured home?**
*(Response rate: 83%)*

58% of respondents believe that there is adequate provision for the sale of a manufactured home. However within the small subgroup of respondents (23% of respondents) who answered the question asking whether they had sold a manufactured home (comprising 12% yes and 88% no responses), 55% did not believe there is adequate provision for home sale.

Looking at the group of respondents who reported they were attempting to sell their home at the time of the survey, 81% did not believe there is adequate provision for the sale of homes. 85% of respondents with homes for sale for longer durations (1 year or longer) do not believe there to be adequate provision for sale compared to the 57% for respondents with homes for sale for shorter durations (< 1 year).

These results suggest the experience of attempting to sell a manufactured home, particularly where the home has been for sale for a longer period, is generally associated with lower satisfaction with the Act’s provision for sale of homes.

**Comment: why is there not adequate provision for the sale of a manufactured home?**
*(Response rate: overall – 33%, relative to answer for related question: no – 89%, yes – 3%, blank – 4%).*

Respondents who answered ‘no’ to the question was adequate provision for the sale of a manufactured home were invited to provide comment as to why that was the case. 330 comments about provision for the sale of a manufactured home were received. 5% of respondents providing a

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43 It should be noted that these comparative differences are based on relatively small subgroups of respondents (81 respondents who provided responses for duration of sale and adequate provision for sale, and 223 respondents who provided responses for have you sold a manufactured home and adequate provision for sale).
comment had answered ‘yes’ to the related question indicating they believed there was adequate provision for selling a manufactured home, while 2% had not answered the question, and 93% had answered ‘no’.

The most frequent comment theme provided as to why there is not adequate provision for the sale of a manufactured home was concerned with the lack of sales effort/professionalism shown by park management or sales staff tasked with selling homes (32%). Descriptions ranged from a lack of professional sales staff, limited advertising/promotional activities undertaken, and generally lack of assistance when selling.

Frequently respondents describe home sales blocked/frustrated by park owners/managers, either directly through refusal to re-assign or indirectly for example by restricting access (19%).

Many respondents are concerned that park owners/managers prioritize new/own homes for sale, at the expense of current owners trying to sell their homes (19%).
15% of comments describe *sales signage/activity restrictions* that impact on effective marketing or sales activities for home sales – these were predominantly focussed on prohibitions or restrictions on for-sale signage.

...I am not allowed to erect a “For Sale” sign on my property. This contradicts all real estate practices and does not in any way assist buyers or sellers. Most frustrating.

...Display of signage and open home prohibited.

...Home owners cannot display “For Sale” signs, park owners demand commission regardless of involvement. Park owners/managers use many tactics to restrict the ability of a home owner to sell including attempting to restrict access by agents. Park owner as developer is a conflict of interest. While they are focussed on selling new homes, they actively prevent the sale of ‘preloved’. There are over 20 homes listed for sale, with various agencies and with park owner, in our park and little or no prospect of obtaining a sale.

12% of comments describe how the respondent believes there is an aspect of *forced engagement* of the park owner/management in resident’s home sales, whether related to a requirement to list with management, commission sharing requirements, or broadly having no choice but to sell through the park owner/manager.

...Residents of the park are at the mercy of the park owners, only a minimum payment should be made to the park owner, on the resale of a property as this is caused in site fees.

...The site owners claim half commission and restrict entry on a real estate person, therefore some agencies do not want to list as they then only receive half commission, which then has to be shared by the agency and salesperson.

...Current managers require a 60 day listing with them initially, do not allow ‘for sale’ signs, are not on site at weekends so miss those passing, on holidays who might have an interest in the village.

11% of comments are concerned with *continued site rent* payment requirements, either as a disincentive for park owners/managers to conduct sales of pre-owned homes, or as a source of distress or burden for home owners or the beneficiaries of deceased estates.

...It depends on individual cases. Where the home becomes part of an estate, beneficiaries can become responsible for ongoing rental payments when estate funds are exhausted.

...The only sell new homes for higher profits, when a property is vacant due to deceased estate, they charge full site fees, plus interest until such times property sold, at least 5 years on market.

...No sale signs, as new villas are sold and re-sales of pre-loved homes, do not matter to owners as fees remain payable by family in case of death.

11% of comments describe *staff availability necessary* for effectively marketing and selling homes as lacking.
Office is not open regularly, no one at the house, owners are hardly there, office only opens for 4 hours every fortnight, difficult for sales agents to come by.

No one on site evening or weekend to deal with enquiries, if we should want to sell.

Management office opens 9-12 M-F, management insist on buyers making app to view homes, never opens on weekend, buyers often go away frustrated and confused, we personally know of several lost sales because manager was unavailable.

<table>
<thead>
<tr>
<th>Theme</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sales effort/professionalism</td>
<td>Specific to sales conducted by park management/staff - limited sales skill, little effort made to achieve sales, limited advertising, only online promotion via park site</td>
<td>32%</td>
</tr>
<tr>
<td>Sales blocked/frustrated</td>
<td>Home sales frustrated directly or indirectly, restricting access of outside agents/buyers, refusal to re-assign site agreement, general obstruction</td>
<td>19%</td>
</tr>
<tr>
<td>Prioritizes new/own homes</td>
<td>Management more interested in selling park owned homes (mostly new, some re-acquired), re-direct purchasers away from pre-owned homes</td>
<td>19%</td>
</tr>
<tr>
<td>Sales signage/activity restrictions</td>
<td>No for sale signs allowed, no open days/houses, buyers must go through management office</td>
<td>15%</td>
</tr>
<tr>
<td>Forced engagement</td>
<td>Initial exclusive listing by management, commission demanded regardless of involvement, must sell through park owner</td>
<td>12%</td>
</tr>
<tr>
<td>Continued site rent</td>
<td>Home sales not promoted - ongoing site rent requirement is a disincentive, burden on relatives</td>
<td>11%</td>
</tr>
<tr>
<td>Staff availability</td>
<td>Limited sales staff/management availability - closed weekends, limited time during day, must make appointment within inconvenient time period</td>
<td>11%</td>
</tr>
<tr>
<td>Sales costs</td>
<td>Commission excessive for work performed, additional charges on top of commission, non-licensees charging same fees as real estate agents, exit fees with sale</td>
<td>9%</td>
</tr>
<tr>
<td>Dissatisfied</td>
<td>Generally dissatisfied</td>
<td>6%</td>
</tr>
<tr>
<td>Forced buyback</td>
<td>Forced sale to park owner at below market value, requirement for park owner first offer, can only sell to park under/outside of rules - at low price</td>
<td>4%</td>
</tr>
<tr>
<td>Unconscionable conduct</td>
<td>Harassment/refusal to sign as reprisal for earlier dispute, consistent disregard/breaches of Act, intimidation to drop dispute action/compensation claim before allowing sale, bullying</td>
<td>3%</td>
</tr>
<tr>
<td>Facilities/costs deter buyers</td>
<td>Buyers deterred by poor maintenance/facilities, high site rent</td>
<td>3%</td>
</tr>
<tr>
<td>Redevelopment/closure</td>
<td>Sunset clause, impending park closure/redevelopment makes sales impossible</td>
<td>2%</td>
</tr>
<tr>
<td>Market/finance</td>
<td>General market conditions unfavourable, financing difficult to obtain for manufactured home purchase</td>
<td>2%</td>
</tr>
<tr>
<td>Cannot rent/sell to investors</td>
<td>Cannot sell to investors/non-resident, cannot rent out house</td>
<td>1%</td>
</tr>
<tr>
<td>Satisfied</td>
<td>Generally satisfied</td>
<td>1%</td>
</tr>
</tbody>
</table>

Dispute resolution

Dispute resolution through park liaison committee or home owner’s committee

*(Response rate: 89%)*

41% of respondents indicated they had sought to resolve a dispute through their home owners committee or park liaison committee. Most commonly, disputes were about site rent increases, followed by maintenance and repair issues, utility charges and rebates, and the actions of other residents.

Comment: park liaison/home owners committee - what was the dispute about?

*Response rate: (overall – 42%, relative to answer for related question: yes – 96%, no – 9%, blank – 19%).*

Respondents who reported seeking to resolve a dispute through home owners or park liaison committee were asked to describe the nature of that dispute. 412 written descriptions of dispute issues were received.

Some comments provided by respondents who had answered other than ‘yes’ to the lead-in question. 11% of commenting respondents had indicated they had not been involved in an internal dispute, the remainder had indicated that they had (84%), or had not answered the related question (5%). A number of respondents described the general nature of disputed issues in their park, in which they may not have been personally involved, or described related matters such as there being no committee or other specific concerns not linked to formal dispute resolution efforts within the park.
Most comments described disputes about issues broadly relevant to the costs of park living. 52% of responses referred to a dispute about site rent increases, 11% referred to service and utility charges, and 9% referred to solar power issues.

A second group of disputes were about the quality and or availability of maintenance, facilities and services in the park. Disputes about the quality of maintenance and construction works (including homes) were relatively common (18%) as were those about the quality or availability of park amenities and services (6%), and security and safety issues (4%).

A comparatively small percentage of disputes were resident to resident or community living issues such as the behaviour of other residents or visitors and disputes over the application of park rules (8%).
Some respondents used the question as an opportunity to either describe their committee as ineffective or powerless to resolve disputes, or to state that there is no home owner’s committee or park liaison committee in their park (8%).

<table>
<thead>
<tr>
<th>Theme</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site rent increases</td>
<td>Excessive site rent increase, market review increase, increases above CPI, increase outside site agreement</td>
<td>52%</td>
</tr>
<tr>
<td>Park and home works/maintenance</td>
<td>Level of maintenance of grounds and facilities, replacement issues, works incomplete, upgrades not performed</td>
<td>18%</td>
</tr>
<tr>
<td>Service/utility charges</td>
<td>Additional service charges, meter reading fees, excessive utility costs, breach of section s.99A</td>
<td>11%</td>
</tr>
<tr>
<td>Solar credits</td>
<td>Park owner using solar input for park facilities, no credit for solar input, no rebate with solar</td>
<td>8%</td>
</tr>
<tr>
<td>Rules/residents</td>
<td>Neighbour dispute, no for sale sign, park rules</td>
<td>8%</td>
</tr>
<tr>
<td>No Committees</td>
<td>No committees in park, internal dispute resolution impacted</td>
<td>8%</td>
</tr>
<tr>
<td>Facilities/services</td>
<td>Alterations to park/amenities, reduction in services, loss of facilities</td>
<td>6%</td>
</tr>
<tr>
<td>Management practices</td>
<td>Acting in breach/outside legislation, sharp practices (e.g. home sales inaction/sales interference), harassment</td>
<td>7%</td>
</tr>
<tr>
<td>Safety and Security</td>
<td>Lack of security (gates, fences), insecure postal service, lighting, critical infrastructure (storm water)</td>
<td>4%</td>
</tr>
<tr>
<td>Committee ineffective</td>
<td>Committee can/will not engage effectively with owner/management</td>
<td>2%</td>
</tr>
<tr>
<td>Unclear issue</td>
<td>No specific dispute issue described</td>
<td>1%</td>
</tr>
</tbody>
</table>

Table 7 Park Liaison / Home Owners Committee disputes
Disputes - Queensland Civil and Administrative Tribunal (QCAT)

Response rate: 93%

30% of respondents indicated they had been involved in a dispute adjudicated by the Queensland Civil and Administrative Tribunal (QCAT). The common dispute issues are identical to those seen for internal disputes: site rent increases, maintenance and repair issues, utility charges and rebates. In many cases respondents indicated that their involvement with QCAT dispute was a direct result of failed internal dispute resolution.

Comment: QCAT dispute - what was the dispute about?

Response rate: (overall – 27%, relative to answer for related question: yes – 91%, no – 7%, blank – 2%).

Respondents were asked to describe the nature of the tribunal dispute they were involved in. 265 respondents provided a comment for this question, with some comments provided by respondents who had answered other than ‘yes’ to the lead-in question. 3% of commenting respondents had indicated they had not been involved in a QCAT dispute, the remainder had indicated that they had (87%), or had not answered the related question (10%). It is presumed that the dispute matters described by respondents who answered that they had not been involved in a dispute related to QCAT proceedings that the respondent was not personally a party to, or matters intended for consideration by QCAT that had not yet been lodged.

The overwhelming majority of QCAT disputes are about site rent increase, whether due to market review, queried as excessive, or arising from increases other than as provided for by the site agreement (71%). Other matters relevant to park conditions or costs of residency were frequently included in the description of these disputes.

- Charging of GST on rent for years, several increases each year, no maintenance, dangerous to old people, owner charging to read meter.
- 3rd person, owner of park wish to add $35 extra on site fees per week, QCAT won on our behalf.
- CPI and market review together.
- Illegal electricity charges, usury charges for water, excessive site fee increases, not listed in site agreements, refusal to pass on QLD Government power rebates, intimidation and bullying of some park residents, lack of basic facilities.

16% of disputes involve service/utility charges, including meter reading fees, or s.99A issues (charging above cost of supply for utility provision).

- Excessive rent increases. Excessive and unlawful utility charges (action current).
- Insecure postal service.
- Current at the moment re: electricity, currently receive no pensioner rebate, management over charged a metre reading fee when they were not supposed to charge it, charged fee for 7 months, won’t refund.
- Charging a fee for reading electricity usage meter.

13% of disputes involve solar issues, including park owners benefiting from solar power produced with no benefit/cost reduction for home owner.
Owners abuse of solar power produced by residents. He has the benefit of our power while refusing to allow us credit for what we produce.

Section 99A dispute relating to solar produced electricity. Park owner is selling more than he is paying for. Filed 2 years ago, no decision forthcoming!

Park owner not giving solar credits after doing so for 2 years, discrimination by park owner as other village in his ownership has residents with solar being given these credits.

### Table 8 Tribunal dispute issues

<table>
<thead>
<tr>
<th>Theme</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site rent increases</td>
<td>Excessive site rent increase, market review increase, increases above CPI, increase outside site agreement</td>
<td>71%</td>
</tr>
<tr>
<td>Service/utility charges</td>
<td>Additional service charges, meter reading fees, excessive utility costs, breach of section 99A</td>
<td>16%</td>
</tr>
<tr>
<td>Solar credits</td>
<td>Park owner using solar input for park facilities, no credit for solar input, no rebate with solar</td>
<td>13%</td>
</tr>
<tr>
<td>Park and home works/maintenance</td>
<td>Level of maintenance of grounds and facilities, replacement issues, works incomplete, upgrades not performed</td>
<td>8%</td>
</tr>
<tr>
<td>Facilities/services</td>
<td>Alterations to park/amenities, reduction in services, loss of facilities</td>
<td>6%</td>
</tr>
<tr>
<td>Management practices</td>
<td>Acting in breach/outside legislation, sharp practices (e.g. home sales inaction/sales interference), harassment</td>
<td>4%</td>
</tr>
<tr>
<td>Safety and Security</td>
<td>Lack of security (gates, fences), insecure postal service, lighting, critical infrastructure (storm water)</td>
<td>2%</td>
</tr>
<tr>
<td>Rules/residents</td>
<td>Neighbour dispute, no for sale sign,</td>
<td>1%</td>
</tr>
</tbody>
</table>
Departmental website

Respondents were asked whether they had accessed information about manufactured homes from the department’s website, and whether that information had been helpful.

Use of manufactured home information on the department’s website
(Response rate: 90%)

Only 23% of respondents had accessed the department’s website for information about manufactured homes.

Helpfulness of website information
(Response rate: 85%)

81% of respondents who had accessed the department’s website found that information to be helpful. 15% of respondents who had accessed information on the Department’s website provided reasons why the information was not helpful. Respondents most often commented either that the information was difficult to understand, or that the content was too general and there was not sufficient information provided about specific aspects of the Act.
Satisfaction with the Manufactured Homes (Residential Parks) Act 2003

Is the act achieving its aims?
Response rate: 89%

The survey described the objects of the Manufactured Homes (Residential Parks) Act 2003, and asked respondents whether:

“In your experience, do you believe the act is achieving its aims?”

Only 15% of respondents are sure the Act is achieving its aims. 49% are not sure whether the Act is achieving its aims, and 36% are sure the Act is not achieving its aims.

Responses to the survey were provided on a self-selection basis. If motivation to respond is influenced by satisfaction with current experiences, then it is likely the results overestimate the level of dissatisfaction with the Act. However the extent or likelihood of that effect is unknown.

Does the Act offer adequate consumer protection?
Response rate: 91%

Respondents were asked:

“Do you believe the Act offers adequate consumer protection for manufactured home owners?”

Only 11% of respondents believe the Act offers home owners adequate consumer protection. 49% of respondents believe the Act does not offer adequate consumer protection, while 41% are unsure.

These results for this question are comparable to those obtained for the question asking whether the Act is achieving its aims. This outcome is unsurprising considering that for many home owners, the questions are arguably synonymous, and broadly assess highly related aspects of satisfaction with the
Act. Considering answers across both questions, respondents were most likely to either respond “no” to both (32%), or “not sure” to both (33%). Only 7% of respondents believed that the Act was achieving its aims, and is also providing adequate protection for consumers.

<table>
<thead>
<tr>
<th>Q. Adequate consumer protection?</th>
<th>Q. Act achieves aims?</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>No 32%</td>
</tr>
<tr>
<td>Unsure</td>
<td>Unsure 3%</td>
</tr>
<tr>
<td>Yes</td>
<td>Yes 1%</td>
</tr>
</tbody>
</table>

Table 9 Correspondence: “Does the Act achieve its objectives?” and “Does the Act provide adequate consumer protection?”

Comment: why do respondents believe the act is not achieving its aims?

Response rate: (overall – 34%, relative to answer for related question: no – 89%, not sure – 7%, yes – 7%, blank – 13%).

Respondents who did not believe the act is achieving its aims were asked to provide reasons why. 336 respondents provided a comment for this item, with some comments provided by respondents who had answered other than ‘no’ to the lead-in question. 3% of commenting respondents had indicated they believed the act was achieving its aims, the remainder had indicated that it was not (85%), were not sure (8%), or had not answered the related question (4%).

A thematic analysis of comments was undertaken to summarise the concerns of respondents when describing why the Act is not achieving its aims.

Close to half of the comments proposed the Act favours park owners (43%). Comments captured by this theme ranged from brief statements that the Act is in favour of park owners, to assertions that park owners had been overly involved during development of the Act resulting in an Act set in their favour.

….The Act of 2003 needs attention to rectify the existing inequities and ambiguities favouring our principal owners, all cases regarding site rents and other financial matters.

….From a residents’ point of view, the Act (no matter how many amendments) appears to favour the owners.

….Park owners’ lawyers helped put the Act together and have left huge loop holes in the Act for park owners to get their way in any disputes, the Act is a joke along with the tribunal.

29% of the comments made mention of site rent/market review as an area in which the Act is not achieving its aims. Comments of this type referred to the high amounts paid by home owners, relatively large increases in site rent, the unfairness of market rent reviews, and payment of site fees for vacant homes.
28% of comments described a range of \textit{sharp/unfair/unconscionable} practices that respondents feel the Act either explicitly allows or fails to protect them from. The range of matters captured by this category is relatively broad, which reflects the very general nature of the question. They range from alleged harassment and bullying of residents, park owner refusal to communicate or negotiate with residents, threats of fee increases or legal actions, and generally operating in a manner that disregards or is contrary to the Act.

20% of comments describe \textit{ambiguities/loopholes} in the Act, which contribute either generally to the Act not achieving its objectives or specifically to inequity and unfairness in how the Act balances rights, responsibilities and protections for home owners and park owners.

17% of comments focus on perceptions that the Act fails to achieve its aims in the area of \textit{service/utilities} fees and arrangements.
11% of comments touch on a QCAT issue, whether about the fairness or appropriateness of QCAT determinations or process, or the over-reliance on QCAT determinations to resolve disputed issues or to secure the rights of home owners.

....Act favours park owners, when they do remain uncooperative, knowing full well that disputes must proceed to a tribunal.
....Tribunal understaffed, access to assistance poor, Act favours park owners.
....Even when a dispute came down in the home owners’ favour, the owners won’t do anything, the owner just laughs at it.
....In 2001 our site rent was $88 p/w similar to other parks, in 2003 site rents vary between $202-235 p/w at my park, the highest in the state, tribunal chairpersons are not protecting home owners from unscrupulous park owner.

10% of comments describe a perceived oversight/enforcement lack. These comments range from concerns that there is no direct oversight or checks on parks by Government officers, that penalties for breaching the Act are lacking, complaints are not acted on, to QCAT determinations not being enforced.

....Gov Dept do not check on villages, so how do they know what goes on in the villages.
....It favours park owners, park owners who breach the Act, not fined or punished, site agreements are written as contracts to favour park owners.
....Fine words but no provision for action against the offending party.
....Residential Services Unit receives complaints but takes no action.
### Table 10 Comments - Why the Act is not achieving its aims?

<table>
<thead>
<tr>
<th>Theme</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Favours park owners</td>
<td>Act generally favours park owners over home owners, Too much park owner input into Act development, protects park owners - home owners lack protections</td>
<td>43%</td>
</tr>
<tr>
<td>Site rent/market review</td>
<td>Act/oversight/determinations failing in the area of site fees, market rent reviews</td>
<td>29%</td>
</tr>
<tr>
<td>Sharp/unfair/unconscionable practices</td>
<td>Sharp practices, threats, intimidation, communication refused, disregarding/acting outside the Act</td>
<td>28%</td>
</tr>
<tr>
<td>Ambiguity/loopholes</td>
<td>Loopholes or ambiguity reduce home owner protections, make understanding of home owner rights difficult, allow park owner advantage</td>
<td>20%</td>
</tr>
<tr>
<td>Services/utilities</td>
<td>Act/regulatory oversight/determinations failing in the area of utility charges, rebates, solar credits, service fees</td>
<td>17%</td>
</tr>
<tr>
<td>QCAT issue</td>
<td>Tribunal issue, quality/fairness of determinations, feel pushed to tribunal to effect any change</td>
<td>11%</td>
</tr>
<tr>
<td>Oversight/enforcement lacking</td>
<td>Penalties lacking, inaction on complaints, determinations not enforced, no checks undertaken on parks</td>
<td>10%</td>
</tr>
<tr>
<td>Unequal footing/lack of assistance</td>
<td>Fiscal/legal advice disparity between park and home owners, legal advice/information for home owners lacking</td>
<td>9%</td>
</tr>
<tr>
<td>Home sales</td>
<td>Home sales primary issue, slow/delayed sales, park closure, park owner controls over sales, exit fees on sale</td>
<td>6%</td>
</tr>
<tr>
<td>Change required - general</td>
<td>Dissatisfied with Act, needs to be changed, no further elaboration</td>
<td>5%</td>
</tr>
<tr>
<td>Disclosure changes required</td>
<td>Lacking expenditure information, inadequate disclosure of basis for various cost increases inc. market review, no disclosure of income figures</td>
<td>2%</td>
</tr>
</tbody>
</table>
Dissatisfaction – relationships with other factors

Response Rate: Average 89%

The questions “Do you believe the Act offers adequate consumer protection for manufactured home owners?”, and “In your experience, do you believe the Act is achieving its aims?” provide broad measures of satisfaction with the Act.

As discussed in the section ‘Site agreements – financial considerations’, there are weak relationships between belief the Act does not provide adequate consumer protection, and both current site rent amounts and site rent increases.

There are also stronger significant relationships between the broad satisfaction measures and other items that assess satisfaction with specific elements of the Act, including:

- “Are you satisfied with the special terms of your site agreement?”
- “Are you satisfied with the process involved in terminating a site agreement?”
- “Is there adequate provision for the sale of a manufactured home?”
- “If you have a market rent review/review to market are you satisfied with how your site agreement provides for these?”

Respondents who believe the Act does not offer adequate consumer protection are also more likely to respond as dissatisfied for the four questions that tap elements of satisfaction with specific aspects of the Act, or specific elements of their site agreement. The results are comparable for the question asking whether the Act achieve its aims.

Multiple regression analysis was used to assess the degree to which a broad range of applicable predictors based on survey measures (including demographic, park characteristics, home
characteristics) could predict the broad satisfaction measures. The only reliably significant predictors were the two questions about dispute resolution.

Dissatisfaction either in terms of the Act meeting its aims, or the Act not providing adequate consumer protection (broad satisfaction measures), is highly related to a respondent’s experiences with dispute resolution: whether internally through committees, or through QCAT.

If a respondent has been involved in an internal dispute, they are 21 times more likely to be dissatisfied on both the broad satisfaction measures than they are to be satisfied. In comparison respondents who have not been involved in an internal dispute are only twice as likely to be dissatisfied on both measures as satisfied.

Similarly, if a respondent has been involved in a QCAT dispute, they are 18 times more likely to be dissatisfied on both the broad satisfaction measures than they are to be satisfied. In comparison respondents who have not been involved in an internal dispute only 3 times more likely to be dissatisfied on both measures than satisfied.

While these likelihoods are slightly lower when the satisfaction measures are considered individually, the picture is similar: involvement in either type of dispute is associated with substantially lower rates of belief that the Act achieves its aims, or that it provides adequate consumer protection.

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44 Stepwise multiple regression with term deletion using the ‘lm’ package for R. Ordered categorical variables converted to ordinal numeric variables. Given the large number of predictor measures exhaustive evaluation of all possible 2-way and higher interactions was not feasible. (R: A Language and Environment for Statistical Computing, R Core Team, R Foundation for Statistical Computing, Vienna, Austria, 2014).
Analysis of comment items

Respondents were asked to provide comments about key aspects of living in a residential park that were based on issues commonly raised by resident stakeholders and representative bodies with the department, as well as issues thought to be relevant and important to residents based on the results of the 2007 Manufactured Homes Survey.

Comment was sought on:

- What do you most like about living in a residential park?
- What do you least like about living in a residential park?
- Increases in site rent and market rent reviews
- Access to the park by family, emergency services or other persons providing a service
- Charges for the on-supply of utilities
- Park rules
- Paying site fees after leaving a park but before the home is resold
- The conduct of park managers and operators
- Dispute resolution
- Any other comments

A thematic analysis was conducted for of all comments of each of the items (see Analysis of comment themes for methodology).

Comment: what do you most like about living in a residential park?
Response rate: 84%

Respondents were asked to describe what they most like about living in a residential park. More responses were received for this comment item than any other. This may be due to it being the only comment item that specifically sought to broadly tap positive elements of a respondent’s residency choice. Other comment items either sought comment as to why a respondent had answered a lead-in question in a way that indicated a negative perception on the topic, or were about several specific issues which historically have been a net source of concern for residents. Essentially the other comment items partitioned specific issues and concerns, and not all of these were relevant to each respondent to the same extent as a single item about the elements of park living they most like.

Respondents most often expressed that the social/community aspects of residential park living were amongst those they most liked (56% of comments). Comments of this type refer to enjoying the companionship, neighbours and friendship associated with living in a residential park. 10% of comments specifically refer to the desirability of social similarity, where other residents are in a similar age group, are compatible, or otherwise ‘like-minded’.

...The sense of community and the friendship with other residents who are of a similar age group.
...Security, safe, like-minded people, company.
...Companionship and friendliness.
Just over half of respondents (51%) like the physical security/safety aspects of their residential park lifestyle.

- Feeling of security.
- A minimal level of security, vandalism etc from that of suburbia.
- The security at night.

Close to one in three (32%) respondents particularly like the facilities/activities that come with living in a residential park.

- Great facilities.
- The facilities/gardens and inclusive activities provided by park owners.
- Facilities, and opportunities to entertain us and continue to be active.

13% of respondents value the opportunity for quiet enjoyment offered by their residential park.

- The friendly residents, the way the village is looked after, community involvement if it is wanted, peace and quiet otherwise, having a nice garden, close to hospital and shopping and other amenities.
- Good neighbours, security, peace and quiet.
- The peace and quiet.

Other relatively frequent themes included maintenance/services (8%) aspects of park living (e.g. garden and home maintenance, shared service and utility costs), the general affordability of living in a park (7%), the location of the park relative to external amenities (shops, health services) and the natural environment (6%), and the independency/lifestyle (6%) enjoyed by residents.
Table 11 “Most Like” comment themes

<table>
<thead>
<tr>
<th>Theme</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social/Community</td>
<td>Companionship, good neighbours, friendships</td>
<td>56.4%</td>
</tr>
<tr>
<td>Security/safety</td>
<td>Physical security and safety, gated community</td>
<td>50.6%</td>
</tr>
<tr>
<td>Facilities/activities</td>
<td>Facilities, gardens, pools, activities</td>
<td>31.7%</td>
</tr>
<tr>
<td>Quiet enjoyment</td>
<td>Peace and quiet, no children, no salespeople</td>
<td>12.7%</td>
</tr>
<tr>
<td>Social similarity</td>
<td>Like-minded people, same age group</td>
<td>9.9%</td>
</tr>
<tr>
<td>Maintenance/services</td>
<td>Lawn mowing, home and park maintenance, utility sharing</td>
<td>7.5%</td>
</tr>
<tr>
<td>Affordability</td>
<td>Affordable, cheaper to purchase, rent assistance eligible, no exit fees</td>
<td>6.8%</td>
</tr>
<tr>
<td>Location</td>
<td>Close to shops and external services, pleasant surrounds</td>
<td>6.1%</td>
</tr>
<tr>
<td>Independence/lifestyle</td>
<td>Independence, great place to live, freedom</td>
<td>5.8%</td>
</tr>
<tr>
<td>Negative response</td>
<td>Experience does not match perceptions, now too expensive, don’t like</td>
<td>4.7%</td>
</tr>
<tr>
<td>Privacy</td>
<td>Privacy</td>
<td>1.4%</td>
</tr>
</tbody>
</table>

Comment: what do you least like about living in a residential park?

Response rate: 65%

Respondents most often expressed that the behaviour, attitudes and practices of park owners/managers are the aspect of residential park living that they least like (47% of comments). Comments of this type often also refer to other defined themes relevant to perceived outcomes of owner or manager behaviour (e.g. maintenance, costs, services/utilities).

.....Having an owner we cannot trust. One who does not maintain the facilities to the standard they should, as advertised when we bought our home. Who did not honour the promises made by their sales staff when selling the homes in this park.

.....Park owner seems to be able to do as they please without listening to residents input.

.....Dictatorial managers who will not spend on improvements.
The costs of living in a residential park were a frequently least liked aspect for many respondents (24%). Concerns about costs were often associated with increases in site rent and service/utility charge increases, and the requirement to pay site fees for vacant homes.

A substantial proportion of respondents identified lacking provision or improvement of facilities/services as an aspect of park living they least like (17%). This theme was often related to concerns about maintenance, another relatively frequent least liked aspect of park life in its own right (15%).

12% of respondents included rules as an aspect of their park they least like. These comments address such issues as there being too many rules in the park, restrictions on visitors and pets, and favouritism, variable enforcement, or under-enforcement of rules.

12% of respondents described the behaviour or attitudes of other residents as one of the things they least like about living in their park.

Other relatively frequent themes included noise/privacy concerns (10%), dispute resolution (7%) both internal to the park and via QCAT and difficulties with home sales (5%).
Table 12  “Least Like” comment themes

<table>
<thead>
<tr>
<th>Theme</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Owners/managers</td>
<td>Behaviour, attitudes, practices of owners and managers</td>
<td>47.0%</td>
</tr>
<tr>
<td>Costs</td>
<td>Cost of park living, cost increases, site rent, utility/service charges</td>
<td>24.1%</td>
</tr>
<tr>
<td>Services/utilities</td>
<td>Facilities insufficient, no improvements, not as advertised, services withdrawn or poor quality</td>
<td>17.1%</td>
</tr>
<tr>
<td>Maintenance</td>
<td>Lack of maintenance of grounds or homes, ongoing construction impacts</td>
<td>14.9%</td>
</tr>
<tr>
<td>Rules</td>
<td>Too many park rules, variable/insufficient enforcement, unilateral rule changes/additions</td>
<td>12.1%</td>
</tr>
<tr>
<td>Other residents</td>
<td>Pet control, troublesome residents, neighbour conflicts</td>
<td>11.5%</td>
</tr>
<tr>
<td>Noise/privacy</td>
<td>Lacking privacy, too much noise, crowding</td>
<td>9.9%</td>
</tr>
<tr>
<td>Dispute resolution</td>
<td>QCAT bias towards park owners, frequent disputes with owners, management will not engage in internal dispute resolution, lack committee for representation</td>
<td>6.5%</td>
</tr>
<tr>
<td>Home sales</td>
<td>Difficult to sell, sales take too long, low resale value, deceased estate issues</td>
<td>5.3%</td>
</tr>
<tr>
<td>Visitors/guests</td>
<td>Visitor restrictions and additional charges, no guest stays while resident absent</td>
<td>5.0%</td>
</tr>
<tr>
<td>Uncertainty</td>
<td>Changes to Act, likelihood of park sale, worried about future park conditions</td>
<td>3.8%</td>
</tr>
<tr>
<td>Pets</td>
<td>Too many pets, too many restrictions on pets</td>
<td>3.7%</td>
</tr>
<tr>
<td>Freedom/control</td>
<td>No control over property, future costs etc., feeling trapped</td>
<td>3.5%</td>
</tr>
<tr>
<td>Security</td>
<td>Lack of security generally, or day/night/weekends, open gates, no onsite manager</td>
<td>3.0%</td>
</tr>
<tr>
<td>Solar/electricity</td>
<td>No solar credits, no electricity rebate, expensive</td>
<td>1.3%</td>
</tr>
</tbody>
</table>
Respondents were asked to provide comments about increases in site rent and market rent reviews. While the majority of respondents addressed an element of site rents or market rent reviews they were dissatisfied with (across all themes dealt with), it is notable that the single most frequent individual theme seen in comments was that site rent increases based on CPI are fair and appropriate (29%), while another largely distinct proportion of comments (15%) were from respondents generally satisfied in relation to the comment topic.

…..CPI increase is fair.
…..Rent increases should be CPI only, rent should not rise if park isn’t kept in tip top condition.
…..CPI increases in site rent is acceptable, any amount above CPI can cause financial problems.

26% of respondents believed that their site rent amount/increase was too high.

…..Frightening as to what and how much rent will go up, how I will afford it, one year it was going up $25.60 p/w.
…..Rent increase should be CPI and not up to 8% as our owners always tell us each year.
…..Site rental is too high for a house a person is supposed to own.

25% were specifically concerned with the transparency and fairness of methods/justification for site rent increases.

…..The existing formula for calculating rent increases is unfair, as it allows compounding of CPI increases and unfair local Govt. charges over and above the actual increase applicable to residents.
…..There is no paperwork available to us on the above increases, we just have to take their word for it and pay up.
…..Percentage varies and is not kept in line with CPI.

19% of respondents were dissatisfied with market review issues, particularly when compared to CPI increases, or in addition to CPI increases, and often in relation to how the market rent reviews were conducted and the benchmarks made.

…..Market review should be abolished.
…..Market reviews are all in the favour of the park owner, we do not have easy access to data to refuse park owner’s claims without substantial costs.
…..Market reviews are biased in favour of park owners there needs to be provision for home owners to obtain a review at a reasonable cost, only then will we have a level playing field, at least two reviews should be mandatory.
…..yearly CPI ok, market rent reviews doubtful.
18% of respondents were generally dissatisfied, while 13% focussed on increase restrictions, questioning increases that are seen to be outside the site agreement or otherwise unfair such as section 71 increases, combining CPI and section 71 increases, and ratchet clauses that only allow for site rent to increase.

...Should be provision for the ratchet fee to be made illegal, at the moment the fees cannot be lowered.
...We don’t have a market rent review in our agreement but the owner got a $20 increase anyway! What’s written doesn’t mean anything.
...Owner persistently asking for large increases over and above current annual increase (5%) under agreement.
...Owners were able to use section 69 and 71 together if it was not a market review.

Table 13 “Increases in site rent and market reviews” comment themes

<table>
<thead>
<tr>
<th>Theme</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>CPI increases fair</td>
<td>CPI based increases fair, appropriate</td>
<td>29.3%</td>
</tr>
<tr>
<td>Amount/increase high</td>
<td>Site fee or increases too high, large</td>
<td>25.8%</td>
</tr>
<tr>
<td>Methods/justification</td>
<td>Concerned with transparency, methods or justification for amount of site rent increases</td>
<td>24.0%</td>
</tr>
<tr>
<td>Market review issues</td>
<td>Dissatisfied with market review, unfair, unjustified, additional to CPI increases</td>
<td>18.8%</td>
</tr>
<tr>
<td>Generally dissatisfied</td>
<td>Dissatisfied with amount of rent, increases in rent</td>
<td>17.8%</td>
</tr>
<tr>
<td>Generally satisfied</td>
<td>Satisfied with amount of rent, increases in rent</td>
<td>14.0%</td>
</tr>
<tr>
<td>Increase restrictions</td>
<td>Agreements/Increases require restrictions re: increases not covered in site agreement (e.g. section 71) or combined with CPI/% increases, ratchet clauses</td>
<td>12.8%</td>
</tr>
<tr>
<td>Increases too frequent</td>
<td>Site fee increases occur too frequently</td>
<td>9.7%</td>
</tr>
<tr>
<td>Maintenance decline</td>
<td>Decline in maintenance despite rents and increases</td>
<td>6.9%</td>
</tr>
<tr>
<td>Facility/services decline</td>
<td>Decline in facilities/services despite rents and increases</td>
<td>6.4%</td>
</tr>
<tr>
<td>Fixed income issues</td>
<td>Specific concerns about impact of increases relative to fixed/indexed incomes (pensions, rental assistance etc)</td>
<td>5.8%</td>
</tr>
<tr>
<td>No value for increase</td>
<td>No benefit/additional value perceived for increased site rent</td>
<td>2.8%</td>
</tr>
<tr>
<td>QCAT dispute lost</td>
<td>Lost QCAT dispute related to site rent</td>
<td>1.3%</td>
</tr>
</tbody>
</table>
Comment: access to the park by family, emergency services or other persons providing a service?

Response rate: 59%

Respondents were asked to provide comments about access to the park by family, emergency services and other persons. The majority of respondents were generally satisfied with the relevant access arrangements in their park (63.2%). However close to one in four respondents commented that their park had difficult access arrangements due to factors such as swipe card availability, gate closures, road widths and conditions, unavailability of personnel after hours and the like (22%).

This theme was frequently seen in conjunction with concerns about emergency access, and the impact on resident health and safety associated delays or difficulties in emergency services, health service workers and the like accessing the park and residents (17%).

<table>
<thead>
<tr>
<th>Theme</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Generally satisfied</td>
<td>Generally satisfied with access arrangements</td>
<td>63%</td>
</tr>
<tr>
<td>Difficult access</td>
<td>Park access generally difficult, time consuming, gate closures, out of hours issues, swipe card availability</td>
<td>22%</td>
</tr>
<tr>
<td>Emergency access</td>
<td>Specific concerns about capacity for emergency/health services access to residents in park</td>
<td>17%</td>
</tr>
<tr>
<td>Management control</td>
<td>Access to park under too much control by management, arbitrary/overly strict rules or Procedures for access made</td>
<td>9%</td>
</tr>
</tbody>
</table>
### Security lacking
- Insufficient park security in terms of entry gates, fences etc.  
  - 6%

### Lack parking
- Insufficient parking for visitor/services access to residents  
  - 3%

### Lighting/signing issues
- Lighting and signing lacking, difficult to navigate the park  
  - 3%

### Visitor restrictions
- Charges/restrictions on visitor stays, additional swipe cards, cannot use facilities, required to accompany visitors  
  - 1%

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**Comment: charges for the on-supply of utilities?**

*Response rate: 52%*

Respondents were asked to provide comments about charges for the on-supply of utilities to their manufactured home. The single most frequent comment theme was that respondents were satisfied with utility charges (28%). However, the remaining themes (apart from the unsure category) all capture elements of utility charges respondents are dissatisfied with, and considering these categories simultaneously 66% of respondents were dissatisfied with at least some aspect of utility charging in their park.

16% of respondents commented specifically that utility charges and the results of increases in these should be on a cost recovery basis. This theme was frequently seen in conjunction with the theme that increases in utility charges should not be included in site rent through section 71 significant additional cost increases (11%).

- **…Should be passed on not increased for profit.**
- **…Park owners should not make a profit on any ongoing utilities, do away with the ready reckoner.**
- **…When charges are applied for above CPI, for that period, payment should be negotiated, payment to recoup in full or part thereof, not to be taken as site rent, this is contrary to the current Act.**
- **…As per CPI, nothing to do with site rent.**

9% of comments took specific objection with being charged a reading/service charge fee for their utility usage.

- **…Residents should not be charged a fee to have electricity meter read each month**
- **…Management charged a service fee when they couldn’t have, not refunded yet, seniors rebate not passed on.**
....Charging fees to read our water and power meters, this is not right, I would quite happy provide them with reading so it didn’t cost me $18 to read my water meter daylight robbery.

An equivalent proportion of comments (9%) questioned the transparency/methodology of utility charge calculations and billing.

....We hope we are charged correctly, as we have no reference material, when we first moved in we were informed of all charges and movements in costs, all pensioner discounts have stopped.
....Charges are always changing, park owner does not produce the complete invoice as per change to Act s.99A March 2011.
....Don’t like the way electricity is not charged per KwH each month, makes it impossible to work out how much bill will be, when on budget this is important.

Table 15 “Charges for the on-supply of utilities” comment themes

<table>
<thead>
<tr>
<th>Theme</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Satisfied</td>
<td>Generally satisfied with arrangements for utility charges</td>
<td>28%</td>
</tr>
<tr>
<td>Cost recovery</td>
<td>Utility charges should be on a cost recovery basis only (as per the Act)</td>
<td>16%</td>
</tr>
<tr>
<td>Site rent</td>
<td>Significant utility cost increase should not be incorporated in site rent (as per section 71) - should be negotiated separately</td>
<td>11%</td>
</tr>
<tr>
<td>Reading/service charge</td>
<td>Do not agree with additional charge for providing utility or meter reading</td>
<td>9%</td>
</tr>
<tr>
<td>Transparency/rigour</td>
<td>Concern with calculation methods, not provided, no separate Bills/itemized accounts</td>
<td>9%</td>
</tr>
<tr>
<td>Dissatisfied</td>
<td>Generally dissatisfied with charges</td>
<td>8%</td>
</tr>
<tr>
<td>Water too expensive</td>
<td>Water charges too high</td>
<td>7%</td>
</tr>
<tr>
<td>Generally too high</td>
<td>Charges generally too high</td>
<td>7%</td>
</tr>
<tr>
<td>Unsure</td>
<td></td>
<td>7%</td>
</tr>
<tr>
<td>Solar credits</td>
<td>Do not receive credits for PV generation, no benefit for subsidising broader park utility use</td>
<td>6%</td>
</tr>
<tr>
<td>Electricity too expensive</td>
<td>Electricity charges too high</td>
<td>4%</td>
</tr>
<tr>
<td>Lack of choice</td>
<td>No choice of retailer</td>
<td>3%</td>
</tr>
<tr>
<td>Gas too expensive</td>
<td>Gas charges too high</td>
<td>3%</td>
</tr>
<tr>
<td>Ready Reckoner</td>
<td>Ready reckoner should not be used</td>
<td>3%</td>
</tr>
<tr>
<td>No rebates</td>
<td>Cannot receive various rebates</td>
<td>2%</td>
</tr>
</tbody>
</table>
Respondents were asked to provide comments about the park rules in their park. Approximately half of respondents were satisfied with the rules in their park (51%). However, 17% of respondents provided comments touching on enforcement issues, where enforcement of the park rules (primarily by operators/management) was lacking, overly variable, or potentially unfair/biased.

One rule for some and one rule for others. Some can break the rules and others can’t.
Park rules changed suddenly without the knowledge or consultation of residents and enforced for some residents and not others.
What park rules? Yes they have park rules but management are the ones breaking them on a daily basis.

10% of comments touched on over-regulation, where the park rules are too strict or too numerous.

Too many strict rules.
Overbearing at times, not enough consideration given to residents.
Some rules are a bit over the top, seem to be more rules every year.

10% of respondents were concerned with the level of owner or management control over the park rules, often citing a lack of consultation about park rule changes or additions.

Park rules should be discussed by residents before changing them.
Should only be altered after a meeting and lengthy discussion with the park owners and all the residents, never consulted in regards to changing of rules.
Our park owner has and is continuing to make park rules illegally, therefore creating dissention between residents and demonstrates his intimidation tactics.
Table 16 “Park Rules” comment themes

<table>
<thead>
<tr>
<th>Themes</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Satisfied</td>
<td>Generally satisfied with park rules</td>
<td>51%</td>
</tr>
<tr>
<td>Enforcement issues</td>
<td>Rules not enforced, variable enforcement, biased/selective enforcement</td>
<td>17%</td>
</tr>
<tr>
<td>Over-regulated</td>
<td>Too many rules, onerous, overly restrictive</td>
<td>10%</td>
</tr>
<tr>
<td>Owner control</td>
<td>Imposition of rules without consultation, no negotiation, for benefit of park owner</td>
<td>10%</td>
</tr>
<tr>
<td>Communication lacking</td>
<td>Rules changes not communicated, not easily available, change without notice</td>
<td>5%</td>
</tr>
<tr>
<td>Visitor/family un友好</td>
<td>Rules overly restrictive for guests/visitors, charges for guest stays, not family friendly</td>
<td>4%</td>
</tr>
<tr>
<td>Under-regulated</td>
<td>Too few rules, what rules?</td>
<td>4%</td>
</tr>
<tr>
<td>Dissatisfied</td>
<td>Generally dissatisfied with park rules</td>
<td>3%</td>
</tr>
<tr>
<td>Pet rules</td>
<td>Issue with pet related rules, more/fewer needed</td>
<td>2%</td>
</tr>
<tr>
<td>Parking rules</td>
<td>Issue with parking related rules, more/fewer needed</td>
<td>2%</td>
</tr>
<tr>
<td>Home sales</td>
<td>No ‘for sale’ signs, restricted agent access</td>
<td>2%</td>
</tr>
<tr>
<td>Speed rules</td>
<td>Speed limit issues</td>
<td>1%</td>
</tr>
</tbody>
</table>

Comment: paying site fees after leaving a park but before home is resold?

Response rate: 65%

Respondents were asked to provide comments about paying site fees after leaving a park but before the home is resold. Only 12% of respondent comments indicated they were satisfied with this requirement, with 22% generally dissatisfied with the requirement, and the remainder primarily discussing a variety of specific ways in which the requirement contributed to hardship, or should be changed from a full site rent payment requirement.

One in three comments (32%) proposed that site rent should be reduced while unoccupied and awaiting sale, often citing the reason that the owner is paying in part for facilities, services and other aspects of park life which they are no longer using.

...Should be discounted as the facilities are not being used by home owners.
...If the property is vacant I can see that rent has to be paid, however a reduced rate would seem appropriate as both utilities and facilities are unused. Could this amount be paid on settlement of the property, given a reasonable length of time?
...Consider 50% of rent reasonable given that some services continue.

15% of respondents suggested that payment of site fees on sale of the home would be more appropriate, with some allowing for payment of accrued interest at an agreed rate.
15% of respondents specifically mentioned the burden on relatives/family or deceased estate issues, or the distress they felt in recognising that potential burden, associated with requirements to pay site fees when they pass away. This type of comment was similar to (and frequently combined with) discussion of the burden associated with site rent payment requirements where a home owner moves due to illness/high care requirements (10%).

11% of comments proposed that site fees should either scale/stop over time, whether diminishing for the period during which the house is sold, or stopping after a defined period.

......If the home owner is deceased then no site fees should be paid until that residence is occupied or resold, no site fees should be paid if a home owner is not in occupation e.g. has relocated to a nursing home.
......Transferring to nursing home, when you pass away, site fees should not be paid until the property is sold, should not be a burden on the family.
......Owners should only deduct fees after the sale of the property is finalized, interest at an agreed rate for outstanding site fees should be charged and paid.

......If a deceased estate, family members have to pay site rentals until house is sold, this could take 5-15 months and most family members find it difficult to meet these payments.
......This causes distress to people who want to leave their home to family, probate can take months and then a sale can take 2 years, these homes are not using water etc. so why can’t there be a reduction?
......If home is vacated as in death/moving to aged care, then the fees should be adjusted, fees should be deferred until sale, so that families aren’t having to pay them.
......Site fees have to be paid or 10% extra is charged to families, if they can’t afford to do this, if a family member has died.
......Depending on the circumstances this could cause hardship if you had to pay nursing home fees etc.
......Needs reviewing, it’s very distressing, when ill health requires a change to nursing care, yet payment for your former residence is still required.

......Should be halved after 3 months as you are not using amenities, water, electricity to house are turned off.
......Consideration and compromise given to decreasing fees after a certain period if house can’t be sold.
......Should be a few months at full site fees, no charge then for the use of amenities, fees gradually reduce as an incentive for management to sell, maybe public auctions could be allowed.
10% of respondents mentioned the difficulty that delayed sale of homes causes when combined with a requirement to pay site fees.

....Houses take a very long time to sell, especially if a person has died, the family should only have to pay site fees for 3-6 months.
....Not fair, some homes take 2 or 3 years to sell.
....Full fees should not be paid, when no facilities are being used, some homes have been for sale over 3 years, becoming a financial burden for children, who are often paying off their own mortgages.

9% of comments express concerns that the requirement to continue paying site fees does not motivate park owner sales of homes that been vacated.

....Rip off, as not enough effort goes into sales, especially on the health of a resident whose estate keeps paying site fees until sold.
....When home owners are deceased or move to nursing homes, family or estate must continue paying full rate site fees, the catch 22 is that park owners have no incentive to sell the home and often actively discourage potential buyers, the family are then either forced to sell to the park owner at greatly reduced prices or sell and continue to pay ever increasing site fees, it is unconscionable and impossible for home owners or their representatives to resolve without assistance from the Act.
.... It’s unfair, park owners don’t worry if home is sold or not sold for years, they still get money.
### Table 17 “Paying site fees before home is resold” comment themes

<table>
<thead>
<tr>
<th>Theme</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduced rate</td>
<td>Site rent should be reduced while vacant, facilities/services/activities not being used</td>
<td>32%</td>
</tr>
<tr>
<td>Dissatisfied</td>
<td>Generally dissatisfied, unfair, should not be allowed</td>
<td>22%</td>
</tr>
<tr>
<td>Pay on sale</td>
<td>Allowance for payment on sale, taken as proportion of sale price, possible payment of interest at agreed rate</td>
<td>15%</td>
</tr>
<tr>
<td>Burden on relatives</td>
<td>Places burden on family members/other relatives, potential hardship</td>
<td>15%</td>
</tr>
<tr>
<td>Deceased owner</td>
<td>Specific reference to burden/unfairness where home owner has passed away</td>
<td>14%</td>
</tr>
<tr>
<td>Satisfied</td>
<td>Generally satisfied</td>
<td>12%</td>
</tr>
<tr>
<td>Scale/stop</td>
<td>Fees should scale over time or stop after a period</td>
<td>11%</td>
</tr>
<tr>
<td>Delayed sale</td>
<td>Impost of requirement given it can take a long time to sell a manufactured home</td>
<td>10%</td>
</tr>
<tr>
<td>Illness/high care</td>
<td>Specific reference to burden/unfairness where home owner is ill or moves to higher care accommodation</td>
<td>10%</td>
</tr>
<tr>
<td>Park owner sales</td>
<td>Ongoing site fee requirements reduce park owner's motivation to achieve sale</td>
<td>9%</td>
</tr>
<tr>
<td>Should be rentable</td>
<td>Home should be rentable to offset costs of requirement</td>
<td>3%</td>
</tr>
<tr>
<td>Pension</td>
<td>Limited capacity to pay additional to other costs for owners on low/pension based incomes</td>
<td>2%</td>
</tr>
</tbody>
</table>
Comment: the conduct of park managers and operators?

Response rate: 67%

Respondents were invited to comment on the conduct of park managers and operators. The number of responses received for this question was second only to the number of responses received for the “what do you most like about living in a residential park?” question. Many respondents included caretakers within the scope of the question, either combined as part of park management stakeholders along with managers/owners, or as distinct from them.

The single most frequent comment theme was that respondents were satisfied with the conduct of park managers and owners (38%).

13% of comments were limited to expressing general dissatisfaction with management/park owner conduct, such as “very poor conduct”, “needs improvement”, “poor”.

However across all defined comment themes the majority of respondents were dissatisfied (59%) with one or more specific aspect of manager/owner conduct. Almost half (44%) of the dissatisfied comments contained at least two dissatisfaction based themes.

16% of respondents provided that management of their park was unprofessional/ineffective, citing concerns such as inaction, lack of dedication, unprofessionalism, or poor management practices. This theme was often combined with other specific concerns.

Concerns about the communication/negotiation skills or practices of managers and owners was present in 14% of comments, ranging from poor communication skills, avoidance of dialogue with residents, ignoring correspondence, and failure to listen effectively to resident concerns.
Resident committee has been involved in many disputes regarding unanswered complaints from home owners, direct to park owner via caretakers, as a general rule most issues are dismissed out of hand.

Our managers are unapproachable, inflexible, have poor people skills, not willing to talk, consult or compromise with residents.

Of particular concern are the several themes that describe a range of manager/owner behaviours or characteristics which are arguably undesirable in all circumstances, and particularly incompatible with the professional running of parks which are largely providers of accommodation and services to seniors. These include dealing with seniors (8%), controlling (8%), aggression/bullying (6%), rude/arrogant (6%), and unethical (4%). One or more of these themes is present in 23% of comments provided.

Park managers should be taught to show respect to senior citizens, but above all to develop honesty and integrity.

Bully, especially widows, have attitude when asked, because they can.

Disgraceful, verbal bullying and harassment of residents (especially older pensioners in bad health and widows).

Rude, aggressive, we become site numbers.

Very nasty, intimidation, threats, pay back, resulting in a lot of stress.

Managements interest in the welfare of residents is that they are purely and only a source of income.
<table>
<thead>
<tr>
<th>Theme</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Satisfied</strong></td>
<td>Generally satisfied with manager/owner conduct</td>
<td>38%</td>
</tr>
<tr>
<td><strong>Unprofessional/ineffective</strong></td>
<td>Poor management, ineffective, lack of dedication, disinterested, unskilled/unprofessional</td>
<td>16%</td>
</tr>
<tr>
<td><strong>Communication/negotiation</strong></td>
<td>Ignores correspondence, denies direct contact, lacks listening skills, will not listen, poor communicator/negotiator</td>
<td>14%</td>
</tr>
<tr>
<td><strong>Dissatisfied</strong></td>
<td>Dissatisfied with manager/owner conduct</td>
<td>13%</td>
</tr>
<tr>
<td><strong>Dealing with seniors</strong></td>
<td>Treat seniors like children, no duty of care, lack empathy with seniors, generational issues</td>
<td>8%</td>
</tr>
<tr>
<td><strong>Unavailable</strong></td>
<td>No onsite management, limited presence, inconvenient contact hours, generally unavailable</td>
<td>8%</td>
</tr>
<tr>
<td><strong>Controlling</strong></td>
<td>Dictatorial, controlling, do as you’re told</td>
<td>8%</td>
</tr>
<tr>
<td><strong>Rude/arrogant</strong></td>
<td>Rude, arrogant, disrespectful, dismissive</td>
<td>6%</td>
</tr>
<tr>
<td><strong>Aggressive/bullying</strong></td>
<td>Aggression, bullying, abuse, intimidation</td>
<td>6%</td>
</tr>
<tr>
<td><strong>Training/qualifications</strong></td>
<td>Qualification/training framework required, performance reviews, ensure necessary skillset</td>
<td>5%</td>
</tr>
<tr>
<td><strong>Top-level</strong></td>
<td>Satisfied with manager but dissatisfied with park owner</td>
<td>4%</td>
</tr>
<tr>
<td><strong>Unethical</strong></td>
<td>Unethical, corrupt, breaching Act/agreements/park rules, dishonest, theft</td>
<td>4%</td>
</tr>
<tr>
<td><strong>High turnover</strong></td>
<td>Owner/manager turnover high, good managers do not last, quality varies with turnover, uncertainty about future managers/owners</td>
<td>4%</td>
</tr>
</tbody>
</table>
Comment: dispute resolution?

Response rate: 45%

Respondents were asked to provide comments about dispute resolution. The response rate for this comment was notably low relative to other comment topics, likely indicating that respondents generally have less direct experience with dispute resolution processes in comparison to the other topics covered by comment questions. It may also be the case that some respondents interpreted the topic as being limited to QCAT disputes, in which case a lack of involvement with that specific process may have led to no response being provided.

The analysis of comments provided for this topic was complicated by the degree of variability in the manner in which, and how often, respondents identified particular issues either as internal dispute resolution issues, or QCAT dispute resolution issues. Where possible themes have been restricted to either of internal or QCAT issues, however some themes such as unfair/biased cover both types, with a portion of comments identified as referring specifically to QCAT through the use of the QCAT specific comment tag.

23% of comments described inaction/disregard by park owners/managers for dispute resolution processes and resident issues within the park. These ranged from failing to address or ignoring home owner concerns and complaints, to simply being unavailable for dispute relevant issues to be presented or heard.

...As there is no longer a home owners committee, residents have to write to management about disputes and concerns about maintenance of facilities etc. and usually nothing is done.

...There is no such thing as “dispute resolution here. Owners/manager does not want to know about any disputes.

...Non-existent if park owner has the attitude that he can do as he pleases, regardless of agreement.

23% of comments presented dispute resolution as unfair/biased in favour of the park owner, describing determinations as favouring park owners or unfair to home owners, the unequal power balance between park owners and home owners in disputes, and in general “one-sidedness. These comments included both general commentaries on dispute resolution, as well as specific description of dispute resolution through QCAT.

...Rent increase challenged through QCAT, was a joke for all the park owners,

...Reprimanded, had disputes on end going to QCAT for months, found them totally against the consumer (residents) all for owners, owners were very often

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45 Many respondents obviously interpreted the topic to include both internal dispute resolution processes through home owners committees and park liaison committees and QCAT disputes (as intended) based on the comments they provided. Any future consultation work in this area should address this potential for ambiguity by describing the relevant forms of dispute resolution the item is intended to address.
reprimanded but NEVER fined, very disappointing for residents to go through this time and time again, the consumer seems to have no rights no protection for manufactured home owners.

....It's all one sided the park owners side.

....Village is going downhill if money is not spent on maintenance and improvements.
....Services are lessening.
....Some advertised facilities not fit for purpose (swimming pool).
....Park owners sets standards and facilities and can withdraw or modify.
....Security non-existent, no maintenance, no money spent on facilities, no aircon in hall.
....Activities that once took place in the village have been stopped by management.
<table>
<thead>
<tr>
<th>Themes</th>
<th>Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inaction/disregard</td>
<td>Park owner/management disregards resident concerns, does not act on issues, ignores communications/complaints, unavailable for contact</td>
<td>23%</td>
</tr>
<tr>
<td>Unfair/biased</td>
<td>Dispute processes biased against home owners, park owner favoured, determinations unfair to owners, unequal power</td>
<td>23%</td>
</tr>
<tr>
<td>Satisfied</td>
<td>Generally satisfied with dispute resolution</td>
<td>18%</td>
</tr>
<tr>
<td>Dissatisfied</td>
<td>Generally dissatisfied with dispute resolution</td>
<td>18%</td>
</tr>
<tr>
<td>Act changes required</td>
<td>Many comments refer to s.71 - should be mutual to both parties or removed from Act, legislative requirement for mediated internal dispute resolution, remove QCAT as dispute resolution forum, enforcement/penalties introduced, general Act changes re dispute resolution</td>
<td>14%</td>
</tr>
<tr>
<td>QCAT specific</td>
<td>Flag for comments unambiguously referring to QCAT issues</td>
<td>10%</td>
</tr>
<tr>
<td>Complex/lengthy (QCAT)</td>
<td>QCAT proceedings complex/legalistic, long process to proceed to QCAT determination, costly, favours sophisticated party.</td>
<td>9%</td>
</tr>
<tr>
<td>Unsure/under way</td>
<td>Ongoing matter, unsure of dispute resolution outcomes, QCAT proceeding not yet completed</td>
<td>6%</td>
</tr>
<tr>
<td>Departmental assistance/determinations</td>
<td>Mediation/dispute resolution function of Department required, Departmental inspectors, on-site visits, Advice service</td>
<td>5%</td>
</tr>
<tr>
<td>Intimidation/repercussions</td>
<td>Reprisals for seeking to resolve issues (internally or through QCAT), harassment, threats, intimidation</td>
<td>4%</td>
</tr>
<tr>
<td>Committee issues</td>
<td>Resolution can be achieved if 'us and them' avoided, results dependent on quality/effort of committee</td>
<td>4%</td>
</tr>
<tr>
<td>Lack committees</td>
<td>Difficult to get anywhere without a committee</td>
<td>2%</td>
</tr>
</tbody>
</table>
Great state. Great opportunity.