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THE VOICE FOR MANUFACTURED HOME OWNERS

Submission dated 28th of January 2022

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**Issues affecting manufactured home owners, with the potential
for improvements, to the Manufactured Homes (Residential Parks) Act
2003, suggested amendments to and in support of a

Manufactured Homes (Residential Parks) (Protection of Home Owners)
Amendment Bill 2021**

Basis points used to increase Site Rent - Consolidated

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Confidentiality

The Alliance of Manufactured Home Owners Incorporated, have sought the opportunities provided to date, to consult with The Liberal National Party Qld Coalition, The Queensland Greens, Independent, One Nation Party, The Katter Party and The Labour Party Members of Parliament, to amend the Manufactured Home Residential Parks ACT.

This submission supports the previous recommendations provided to government, the opposition, and Members of Parliament to prescriptively Amend the Queensland Legislative ACT being the Manufactured Home Residential Parks ACT 2003.

These amendments are and will be an ongoing concern in Queensland local communities and therefore are not exhausted in this document by their very nature and will evolve over time to be added to, thereby bringing the Manufactured Home Residential Parks ACT back into a state of equitability for both home owners and park owners.

This specific submission relates to the way a corporation or park owner of a Manufactured Home Village can raise rents on an annual basis in line with affordability policies, rate of inflation, average wage rates and costs of living and viability of the manufactured home market sector.

It has been noted that with meetings and conversations with certain Members of Parliament that they do not understand nor have read the recommendations submitted. It is therefore suggested that these recommendations be taken seriously and read in conjunction with previous submissions to government.

BACKGROUND:

AMHO is a non-profit, unpaid volunteer staffed association assisting Manufactured Home Owners in residential parks and villages from the Gold Coast to Far North Queensland.

AMHO provides its members with information and insights on matters pertaining to the *Manufactured Homes (Residential Parks) Act 2003* (the Act), but the main thrust of AMHO's endeavors is to provide maximum assistance and authoritative advice when problems arise concerning residential park living. AMHO helps its members interpret and understand their site agreement and the relevant legislation and gives practical and hands-on assistance to members engaged in meetings with park owners / managers, mediation or disputes before the Tribunal.

Members receive personalized assistance with compiling applications, submissions, and evidence, and AMHO officers will accompany members, or in some cases represent them, in dispute matters.

In order to achieve this AMHO issues a quarterly newsletter, maintains a website, email, and phone contact for our members. Holds public meetings and offers an advice line for all members. AMHO is administered by a Management Committee, consisting of 6 members, and also liaison persons in many parks where we have active members.

AMHO recognises and appreciates the efforts of QCAT in fairly interpreting the Manufactured Homes ACT and seeking just and fair outcomes.

Feedback and matters of concern from our members throughout the State, allows AMHO to keep abreast of problems and matters which can, and do, affect its members (and all manufactured home owners), and that may require further investigation or action.

Additionally, AMHO is active in seeking changes to current legislation and has participated in advisory committees and related bodies in all past reviews and consultations and is continuing to do so at this time with the Housing and Homelessness Action Plan 2021 – 2025 and the Queensland Housing Strategy 2017 – 2027 meetings in 2021.

BACKGROUND CONTINUED:

AMHO is cognisant of the main intent of the Act and that it must address a balance of rights between park owners and home owners, but nevertheless hopes that the concerns expressed in this submission will be addressed in future framing and consideration of amendments of the present ACT.

AMHO submits that manufactured home owners are *unique* because manufactured home parks (MHP's) have specific characteristics which cause them to comprise of a *unique* way of living and accommodation. Manufactured Homes fall into an obscure area of owning real estate, a freehold title but not owning the land it is sited on, hence not coming under tenants as in rented premises, or owners of a private home and land scenario.

Thus, this can lead to aspects that demand careful consideration and focus when drafting or amending Legislation for this area. The future legislation and amendments should be able to move with the change in the Manufactured Homes growth and modifications of Parks / Resorts of different formats and design.

One rule fits all does not now apply, with changes in Manufactured Home Parks / Villages and, now including Lifestyle Resorts, and more expensive and upmarket facilities that then bring in more complex site agreements and many more rules put in place by the Park Owners and their agents. Because the site agreement is a licence and not a lease it can be manipulated in favour of the Park Owner and makes the home owner open to issues outside of the Act that infringe on their rights and legal status.

Restrictions and rules are part of living in a Manufactured Home Park / Resort / Village, and the Act has managed to address many unfair, and illegal rules, and behaviours, of those who owned these premises. Now that there is an Act and legislation to support Manufactured Home Owners, and being relatively new in its formation and standing, it is timely to continue to address some areas of concern by home owners in the Act, and to continue to maintain and amend it as a living document so it is a fair and equitable benchmark for their rights.

Summary of Submission

This submission outlines the relevant topics already addressed previously as concerns by AMHO and Manufactured Home Owners under the Manufactured Homes (Residential Parks) Act 2003.

Focus will be about immediate suggested amendments required for residents living in a residential park or resort relating to affordability rental rates for home owners and profitability for park owners.

The Amendments made to the ACT and passed under royal accent in 2017 and 2019 provided a power inequity in favour of the corporate park owners and failed to address the Main Object of the ACT:

**** Manufactured Homes Residential Parks Act Division 2 Objects of Act and relationship with FTI Act Number 4 ****

The **Main Object** of this Act is to regulate and promote fair trading practices in, the operation of residential parks –

1(a) to protect home owners from unfair business practices;

2(b) to enable home owners, and prospective home owners, to make informed choices by being fully aware of their rights and responsibilities in their relationship with park owners.

Having spoken to many Members of Parliament, with more meetings yet to organise, AMHO is drawing to attention to a housing sector in crisis where rent increases is outstripping the fixed incomes of the home owners, this housing market sector predominantly consists of aged or disabled pensions who will be outpriced out of their own homes within the next 5 years. Following those people who already have been over the last 3 years.

Government must act now before the crisis in the manufactured homes sector deepens to the point it is irrecoverable.

Rents in manufactured home villages already are applied at 40% or above for residents who are on the aged and disabled pensions, well above the wider community of 24% rents against the average income of workers. This style of housing must be viewed over the long term at sustaining financial viability and affordability for home owners and the sector in general. If the present trajectory of how rent as applied is ignored, the exodus of people becoming homeless, having to sell their own home and other residents unable to afford to live in these villages having to move will increase.

The multi-billion-dollar multi-national corporations that now own these manufactured home villages are making in excess of 65%+ pure profit being sent offshore to the overseas headquarters of the parent companies. Thereby no profits are maintained in the Queensland economy and facilities are barely maintained to an acceptable standard.

An example snapshot of the past three (3) years shows rents as a percentage of fixed income referenced from a resident living in a manufactured home village have been charged at 40% and rising.

	Full Pension			Rent Increase			Rental Percentage of Income
	Fortnight	Increase	%	Fortnight	Increase	%	
2020	882	22	2.49	355.02	3.51	1.00	40.02
2021	868	8	0.92	351.51	18.07	5.42	40.32
2020	860	18	2.09	333.44	13.44	4.32	38.48
2019	842			320			

These rental incomes show no consistency against a fixed income and identifies the percentage rate to be well above the 'norm' of the outside wider community in terms of rental percentages applied being 40% compared to the average rents across the rest of Queensland being 24%.

Table 3: National rental affordability index summary by metropolitan areas and rest of states and territories, June 2020

Region	Rent affordability index	Proportion of household income spent on rent	Relative unaffordability
Greater Sydney	126	24	Acceptable rents
Rest of New South Wales	124	24	Acceptable rents
Greater Melbourne	140	21	Acceptable rents
Rest of Victoria	121	25	Acceptable rents
Greater Brisbane	129	23	Acceptable rents
Rest of Queensland	123	24	Acceptable rents
Greater Perth	145	21	Acceptable rents

Note: Data for the Northern Territory are not available. Source: SGS Economics and Planning 2020.

All of this information above is explored in more detail in the submission and recommendation provided to government named:

Specifically pertaining to the basis points used to increase Site Rent

The concise following recommendations have been provided to Amend the Manufactured Homes Act immediately and recommend solutions to raising rents equitably on an annually basis that are in line with the fixed income pensions of home owners living in manufactured home villages.

RECOMMENDATIONS POINT 1.

REMOVAL OF MARKET RENT REVIEWS AS A BASIS TO RAISE RENTS

1. Market rent reviews are open to / and are abused by park owners to raise rents to an excessive level to maintain profits levels. Insights into the valuation processes by a valuer engaged at Ironbark Aspley by Hometown confirmed that the valuation process is not an independent process as outlined in the below reality.

The valuer is engaged and paid by the park owner. Conversations occur where the valuer will ask the park owner what they want per week and will build the report around what the park owner requests the rent to be, as QCAT will not question a valuer's report, even though the entire process is in laymen's terms a guesstimate, not a formalised process based on the quality of the data in comparing "Like" parks and facilities.

By excessively raising rents through a market rent review, park owners are effectively maintaining a profit margin of currently between 50 – 80% clear profit to evaluate and provide large returns to shareholders.

The same can be accounted for with park owners who mandate a percentage rate increase plus CPI. This effectively acts as compounding interest on a yearly basis which in turn can be classified as unfair, excessive, and inequitable, forcing rents up on home owners on fixed incomes (pensions - aged / disability / DVA). These fixed percentage rent rises +Plus CPI should also be removed from the ACT along with the park owner's ability to enforce such content in site agreements.

From a financial perspective of park owners operating budgets, proper analysis of accounts receivable ledgers would show that if the Manufactured Home Residential Parks ACT was restricted to an increase in rent / site fees of CPI only per year. Companies would on average be obtaining an income source of between 15 – 25% profit once overheads are taken into consideration.

This would be classified as reasonable profits for a return to shareholders of these major corporations and businesses that own and operate these manufactured home villages.

2. Prohibition should also be placed on park owners implementing and enforcing upon individual home owners site agreements, Deed of Variation amendments that are intended to place the park owner at a distinct advantage financially, given that the park owners can at any time vary the site agreement to insert coercive financial clauses. Under the ACT the home owner must agree to any Deed of Variation in good faith and where the home owners do not agree to alter their site agreement no variations take place, and no rental increase occurs.
3. It must also be stipulated in the ACT Section 69E (4) Notice of General Increase In Site Rent that park owners are currently operating in the following manner with new buyers. Currently new buyers are not disclosed the current highest rent in a village, allowing the park owners to fraudulently add an increase of \$10 or more to a new buyers rent / site fees per week. Then when the General Increase date arrives the new buyer is once again hit with a site fees / rent increase for a second time within a 12-month period. This business practice is a breach of the current ACT and must be legislated against and eradicated immediately.

The amendment legislated in the Act in 2019 must be removed - Section 69E (4) which makes home owners pay increase until QCAT make a ruling and produce and order or direction under a formal Form 11 Dispute. Such increases are excessive, and the immediacy of payment should not be implemented. Park owners must justify to the tribunal why an increase is entitled to be enforceable, however home owners should not pay any increase unless it is accepted formally by a QCAT order or direction at a state level under the ACT.

4. It must be noted that this practice also breaches section 95 Fraudulent or misleading conduct The park owner for a residential park for which site agreements are in force must not engage in conduct that is fraudulent or misleading in the operation of the park.
5. It should also be noted that at present home owners under the current dispute process must attend a QCAT Dispute / Hearing 'Unrepresented' when park owners are allowed access to engage barristers on

their behalf in an adversarial legal process. There must be an avenue provided to assign legal counsel to home owners to engage on a level legal playing field with legal representation at tax payers expense or negate the park owner’s ability to hire legal professionals.

- 6. It is noted that park owners have also abused the site agreement process by adding into these contracts under additional charges a weekly fee for any additional occupant or vehicle above one (1). This is required to be prohibited and amended so that this form of financial abuse is abolished.

RECOMMENDATIONS POINT 2.

REMOVAL OF CPI VOLATILITY AS A WAY TO RAISE RENTS

1. The past 2 years from 2020 to 2022 has shown that the Manufactured Homes (Residential Parks) Act 2003 can be extremely volatile when using the Schedule 2 Dictionary in the ACT to apply CPI of the All Groups consumer price index for Brisbane.

It clearly shows that disparity when one Manufactured home village can be charged a CPI increase of 1.3% annual increase in May 2020 using the March Quarter and another Manufactured home village in the state of Queensland can be charged a 4.9% annual increase in August 2020 using the June Quarter base on the Brisbane CPI and not the State of Queensland.

Year-ended percentage change				
Date	Consumer price index		Other consumer price measures	
	All groups	Excluding volatile items	Weighted median	Trimmed mean
2017/2018				
Sep	1.8	1.9	2.0	1.7
Dec	1.9	1.9	2.0	1.7
Mar	1.9	2.0	2.0	1.7
Jun	2.1	1.8	1.9	1.6

Year-ended percentage change

Date	Consumer price index		Other consumer price measures	
	All groups	Excluding volatile items	Weighted median	Trimmed mean
2018/2019				
Sep	1.9	1.2	1.9	1.7
Dec	1.8	1.6	1.9	1.8
Mar	1.3	1.3	1.5	1.6
Jun	1.6	1.5	1.4	1.6
2019/2020				
Sep	1.7	1.9	1.3	1.6
Dec	1.8	1.7	1.2	1.6
Mar	2.2	2.1	1.5	1.7
Jun	-0.3	0.4	1.2	1.3
2020/2021				
Sep	0.7	0.9	1.2	1.2
Dec	0.9	1.5	1.4	1.2
Mar	1.1	1.4	1.3	1.1
Jun	3.8	3.1	1.7	1.6

Sources: ABS Cat No 6401.0

The Manufactured Home Residential Parks ACT, Schedule 2 Dictionary CPI means the All Groups consumer price index for Brisbane published by the Australian statistician should be amended to remove rental increases based on the All Groups CPI and replaced with the lower CPI Index of The Trimmed Mean or Weighted Median.

Table 1 Percentage change in the CPI

Capital city	June qtr 2021		March qtr 2021	
	Quarterly	Annual	Quarterly	Annual
Brisbane	0.8	4.9	0.6	1.7
Sydney	0.8	4.1	0.4	0.9
Melbourne	0.3	2.9	0.3	0.8
Adelaide	0.5	2.8	0.6	1.2
Perth	1.9	4.2	1.4	1.0
Hobart	1.1	3.6	0.8	1.1
Darwin	1.0	6.1	2.6	2.3
Canberra	0.8	4.8	0.9	1.6
Australia	0.8	3.8	0.6	1.1

Source: <https://www.qgso.qld.gov.au/issues/3441/consumer-price-index-202106.pdf>

If CPI is calculated using the '**All Groups**' Brisbane CPI Dictionary meaning - Section 69A Basis for site rent increase, then this is encouraging park owners to charge rent at unrealistic levels and should be changed and replaced with the lower CPI Index of The Trimmed Mean or Weighted Median.

If consensus is failed to be reached by the government on a fairer calculation of CPI where rents are not included in volatile items, then as another avenue of raises rents, **CPI should also be abolished as a mechanism of raising rents.**

RECOMMENDATIONS POINT 3.

SPECIAL COSTS RAISING RENT

Openly these special cost rent / site fee increases should be **removed entirely** as a way for park owners to increase rents as they are under the current laws, this section of the Act is being abused by park owners raising rent in parks to maintain their excessive profits margins and make excuses to pass on operating overheads that are a part of everyday operations, which should not be considered to raise rent in a park as an added burden to home owners because a park owner conducts their business in an ineffective and inefficient manner.

Manufactured Homes (Residential Parks) Act 2003

Sections to be Included for Removal

2.2 Division 3 Increase in site rent to cover special costs

Section 71 Application of division

Clause (1, 2 & 3)

Section 71A Notice of special increase in site rent

Clause (1, 2 & 3)

Section 71B Agreement to proposed increase for upgrade cost

Clause (1, 2 & 3)

Section 71C Dispute Resolution and application to tribunal about special increase in site rent

Clause (1, 2, 3, 4, 5 & 6)

Section 71D Criteria for tribunal to confirm or reduce proposed increase

Clause (a, b & c)

RECOMMENDATIONS POINT 4.

REVERSAL OF RENT PAYMENT CLAUSE IN ACT

69E Notice of general increase in site rent

3. (4) The proposed increased site rent is payable from the general increase day stated in the general increase notice.

If any implementation of an increase in site rent is deemed to be excessive by village residents then this increase is not to take place immediately and payment is not to be made until a proper QCAT Resolution is reached, as this can take 2 years or longer.

As any increase is being contested as excessive, by accountability to park owners to counteract the current issue where park owners do not need to provide proof of proposed increases to rent / site fees. This requires amendment, to where park owners under all circumstances are required to provide all financials, (no redacted financials) in detail (open ledger) as to the proposed increase in rent / site fees to the park in question via the home owners committee, the resident representative organisations – Alliance of Manufactured Home Owners Inc (AMHO) / Associated Residential Parks Queensland Inc (ARPQ) and the Queensland Civil Administration Tribunal (QCAT).

This way the park owner must justify any increase in rent / site fees where the residents can be represented at the Queensland Civil Administration Tribunal, who in due course must issue an order or direction before any increase can be applied. Under this condition the home owners of the park affected, AMHO and ARPQ are able to argue for or against the proposed increase in rent before QCAT can issue orders and directions agreed upon, whether that be to decline the increase or agree with the increase.

Under no circumstances are residents to pay any increase in rent immediately as it provides no mechanism where increases can be contested fairly. The current ACT sees residents paying immediately even when they don't agree with the increase in rent being excessive.

This leads into a fairer way to raise rents by directly linking rent increases back to the increases in fixed incomes / pensions of residents living in manufactured home villages.

RECOMMENDATIONS POINT 4.

FAIREST WAY TO RAISE RENT IN LINE WITH WIDER QUEENSLAND COMMUNITY TO MAINTAIN VIABILITY OF MANUFACTURED HOUSING SECTOR

Any rent increase should be connected to and fixed in line with rises in the fixed income of pensioners living in manufactured home villages. With the majority of people living in manufactured home villages on aged or disabled pensions the viability of this housing sector must come before protecting park owners' profits as this IS NOT the "Main Object" of the ACT.

Pensioners on fixed incomes (Aged/Disabled) have an annual income percentage increase connected to inflation and the cost of living which has rarely risen above 2% in the last 5 years, and not expected to in the foreseeable future. Therefore, any increase in rent should be directly connected to the increase in fixed incomes and be a set percentage below that of any rise in these fixed incomes.

Using this basis as a fairer way of applying rent increases, then as pension incomes do not and have not increased above 2.5% over the past 5 years, to bring rents in manufactured home villages back into line with the wider community:

Annual increases in rent should be applied at flat 1% and no greater to ensure the affordability so that it does not outstrip the fixed incomes of residents and long term viability of this housing market sector is maintained.

Objective reasoning to maintain a strict annual increase of 1% allows the park owners to maintain their current profits of 65%+ for at least the next foreseeable decade. Meaning there is no fear of these corporations becoming unviable financially unless they are financially incompetent and mismanage their operational funding.

Conclusion:

Consistency with policy objectives of authorising law.

The submission is consistent with the main object of the Manufactured Homes (Residential Parks) Act 2003: that is, to protect home owners from unfair business practices; and to enable home owners, and prospective home owners, to make informed choices, by being fully aware of their rights and responsibilities in their relationship with park owners.

The submission will benefit both park owners and home owners by providing clarity and promoting fair and consistent practices. This is likely to reduce time-consuming, expensive, and upsetting disputes going to QCAT about residential parks.

We need to ensure that the residential housing system of manufactured home parks is stable and secure, providing protections and giving confidence to those who reside and invest in these housing options. We are committed and working towards giving residents, through changes in legislation and access to advice and support best possible outcomes for them. This includes ensuring consumers and operators are better informed about their choices, rights, and responsibilities and how to action them.

Only through submissions such as this, can matters, that become highlighted by manufactured home owners, over time, be brought to the attention of the government and appropriate authorities. This then can allow discussion, and consultation to hopefully bring about a fairer and more equitable playing field for home owners and Park Owners.

However, what is required to be pointed out is that at present the problems are caused by the original choice in drafting the wording within the current ACT to use the CPI All Groups Indexation figure. This means that any park who has a rent rise using the June 2021 CPI figure will be charged 4.9% the “All Groups Index for Brisbane” and there is no path to QCAT for relief.

We find ourselves in a time when interest rates on savings accounts are under 1%, people are struggling with COVID, and the park down the road was only charged 1% CPI for their rent rise in May 2021, grossly unfair but legal under the Act.

Hometown Green Wattle residents are trapped into this June CPI figure of 4.9% while Hometown Ironbark were given a May CPI figure of 1% rent increase, same year, and company, but very different outcome, thanks to the ACT.

Hometown have told Green Wattle the figure is inflated and made an offer of 3% this year and 3% next year which is well above what other Hometown Villages have been charged. Green Wattle residents have offered 2% but it was refused, and the offer given by Hometown will put their rent up 6% in two years and QCAT would say that, as they are entitled to CPI 4.9% their offer is fair and just, but it's not.

The wording within the Act must be changed to protect the financial viability, not only of the home owners, but to ensure this sector of the housing industry remains affordable now and well into the future.

Given the volatility of the quarterly CPI All Groups figure shown above in the Year-ended percentage change issued by the Australian Bureau of Statistics, spiking to a June 2021 increase of 3.8%, this becomes a major issue when compared to the Brisbane City Year Ended Percentage rate change that is much higher than the National figure.

A summary of the percentage changes for the capital cities is listed below:

City	Index for June 2020	Index for June 2021	Percentage change
Sydney	114.7	119.4	4.1%
Melbourne	115.7	119.1	2.9%
Brisbane	113.6	119.2	4.9%
Adelaide	114.6	117.8	2.8%
Perth	112.1	116.8	4.2%
Hobart	115.6	119.8	3.6%
Darwin	109.0	115.6	6.1%
Canberra	112.8	118.2	4.8%

Source: <https://www.hopgoodganim.com.au/page/knowledge-centre/blog/june-2021-quarter-cpi-figures-released-28-july-2021>

Therefore, this is the reason for this submission to provide recommendations into changing the way site rent in manufactured home villages are increased to provide not only a fair and equitable methodology for rent increases, it also aligns with affordable housing policies being advocated for by the various political parties in Queensland Parliament.

Related aspects:

AMHO require that the decision makers recognise and take into account the fact that a large proportion of the Manufactured Home Owner demographic, are older and aged persons, unversed in legal and organizational matters, and often without the health or energy to battle bureaucracy, or to persist in the face of park owner inaction or non-compliance.

Older persons should be able to enjoy human rights and fundamental freedoms when residing in any residential park, including full respect for their dignity, beliefs, needs and privacy, and for the right to make decisions about their care and the quality of their lives. Where there is a large population of older Australians in an enclosed environment such as a manufactured homes park, this can create a habitat of availability for management or owners of these parks to act in a manner that is contrary to the law and human rights, without fear of retribution due to having a perceived “captive audience” and all-consuming power of the residents.

Around 15 per cent of the Australian population is aged over 65 – approximately 3.7 million people. Australia has an ageing population, and this number is predicted to rise to 23 per cent of the population by 2055. Older persons should be treated fairly regardless of age.

There is a lack of reliable prevalence data on elder abuse. The Australian Institute of Family Studies reports that it is likely that between 2 per cent and 10 per cent of older Australians experience elder abuse in any given year. In the residential parks there is an abundance of this age group, and therefore more open and susceptible to abuse.

Working with relevant stakeholders such as AMHO enables the Government bodies to keep in touch with the residents of the manufactured homes parks and the issues that they are facing on a daily basis. AMHO works face to face with the residents and the management in many matters and can be a voice of reason and a mediator at times of conflict and disputes, as a front-line service.

Communication, conflict resolution and safety requirements are all part of the skills and support needed for parks and villages to function in the best interests of all involved and connection to services and organisations that can support these processes is fundamental.

AMHO can address information gaps for government bodies working in the area of older Australian's abuse and in the area of manufactured home parks, support and resources are needed to ensure residents are able to live safely, securely and connected.

No access to internet by residents is a factor that requires addressing due to those residents being unable to obtain more readily the information that addresses these issues.

Government departments are pushing more information and services online and residents have difficulty accessed many services and support organisations and less ability to have access to services and support organisations.