

## Manufactured Homes (Residential Parks) Amendment Bill 2024

**Submission No:** 45  
**Submitted by:** Mirvac  
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10 April 2024

Committee Secretary  
Housing, Big Build and Manufacturing Committee  
Parliament House  
George Street  
Brisbane Qld 4000

BY POST/EMAIL – [hbbmc@parliament.qld.gov.au](mailto:hbbmc@parliament.qld.gov.au)

Dear Committee Secretary

**Re Manufactured Homes (Residential Parks) Amendment Bill 2024**

I am writing to you on behalf of Mirvac who have consulted extensively with our investment partner Serenitas to note our concerns regarding the recently introduced Manufactured Homes (Residential Parks) Amendments bill (the bill). Mirvac is top 100 ASX listed company and one of Australia's leading developers, with a pipeline of projects worth an estimated ~\$5 billion and delivering almost 11 000 new homes for Queenslanders. Serenitas is one of the largest operators of land lease communities in Australia.

As you may be aware, Mirvac recently acquired a stake in Serenitas and together we are planning to grow on the already existing portfolio of high-quality residential parks in Queensland over the next 5-10 years, bringing investment and increased housing supply to the State.

First and foremost, we acknowledge and support the Government's dedication to fostering fair and transparent residential parks, establishing a modern legislative framework that aligns with community expectations, and promoting sustainability for homeowners and park owners.

The residential park industry is growing and is providing essential and affordable housing within a supportive community setting for older Queenslanders. As the industry grows it has the potential to increase supply of thousands of new high-quality, low-cost homes as well as attract millions of dollars of investment into the State.

Protecting the rights and livelihoods of existing consumers from unscrupulous operators is undoubtedly crucial. However, we must carefully consider the unintended consequences and ramifications of this bill on the sector's growth, which is vital for maintaining a robust housing pipeline by freeing up larger underutilised family homes and accommodating future Australians, namely:

- It appears the Bill aims to align Manufactured Homes Estates (Residential Parks) with the Seniors Living sector. This alignment misunderstands that Lane Lease communities are entirely different proposition to retirement living, with residents actively choosing to live in this sector as opposed



to a retirement village. Further, we find this approach counterintuitive given the well documented consumer shortcomings of the retirement village business model and short-sighted given the potential for this affordable living offering to cater to individuals of all ages, not just seniors.

- Despite numerous rounds of consultation, it appears that feedback from operators and large investors was not taken into account.
- From an operational perspective, we've observed that a business model permitting the payment of market rent best serves the homeowners' interests, facilitating home price appreciation and ensuring the ability to sell within reasonable timeframes. Such a model fosters necessary reinvestments into the community, enhancing its overall quality and sustainability.

**Proposed Amendments:** To mitigate these concerns, we propose the following amendments:

- Exclude existing Residential Site Agreements from the bill's provisions, maintaining stability for current investors and homeowners, with the ability for homeowners to seek redress through QCAT should they believe the rental increase is excessive.
- Introduce "allowable increase provisions" within the Act for park operators, covering costs such as rates, utilities, waste management, taxes, salaries, and insurance, without necessitating a QCAT process for every adjustment. This amendment aims to reduce the administrative burden and address cost increases that may surpass CPI adjustments.

**Next Steps:** We believe that should operators' costs increase faster than their income there will be a detrimental effect on the community, that can include a reduction in services provided to homeowners, reduced maintenance of infrastructure and an overall deterioration in the quality of the community which will impact retirees in terms of value and speed when they need to sell their home.

The short-term thinking of this legislation puts at risk the single largest investment of tens of thousands of Queensland homeowners, an estimated ~\$7-10b of Queensland resident owned homes, the value of which will be at risk should these changes occur.

We respectfully urge the Government to reconsider the bill through in its current form and ask there be further consultation to work through some of these unintended consequences with industry to ensure residents do not lose out and to ensure the long-term success of this sector.

We have attached a copy of our submission made during the exhibition of the Consultation Regulatory Impact Statement and should you be interested to discuss further we are happy to attend your offices.

Our contact for your office in Stephanie James, Director Government Relations & Stakeholder Engagement, Mirvac [REDACTED]

Yours faithfully



Stephen Gould  
General Manager - Land Lease