



# SUBMISSION TO THE HOUSING AUTHORITY SENIORS HOUSING STRATEGY DISCUSSION PAPER





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## Executive Summary

Shelter WA welcomes the opportunity to provide a submission to the Housing Authority's *Seniors Housing Strategy discussion paper*. Shelter WA is an independent, community based peak body committed to accessible, affordable, appropriate and secure housing for low income and otherwise disadvantaged persons, including those experiencing homelessness or at risk of homelessness in Western Australia.

Shelter WA's response to this discussion paper is based on contemporary research, as well as consultations with key stakeholders. The consultations include a workshop with 68 participants from non-profit organisations, private industry and government; in-depth consultations and surveys with over 187 seniors in metropolitan and regional areas; and an additional online seniors housing survey completed by 297 respondents. Shelter WA also analysed de-identified Seniors Housing Advisory Centre (formerly Seniors Housing Centre) call centre data collected from 1 January 2014 – 19 February 2016. Shelter WA's response is also supplemented by its research project 'Preventing Homelessness Among Seniors', published in November 2015.

The stakeholder engagement activities mentioned above were undertaken at the request of the Housing Authority to inform the development of the Seniors Housing Strategy. This process was coordinated by Shelter WA, and supported by the Housing Authority, Council of the Ageing Western Australia (CoTA WA), and Aged and Community Services WA (ACSWA).

Shelter WA confirms the research undertaken by the Housing Authority in the discussion paper is consistent with existing research in this area. Shelter WA agrees the key themes identified in the discussion paper are of high importance to seniors, but insists there are other key issues, including security of tenure and housing diversity, that are also of critical importance. It was also clear from engagement activities mentioned above that support, advice and advocacy are also crucial for seniors to access appropriate housing. Shelter WA insists these additional issues must be of greater consideration in the Seniors Housing Strategy.

Based largely on the key themes highlighted in the discussion paper, Shelter WA recommends the following:

### Theme 1: Diversity and downsizing

1. Confirm the importance of housing diversity in the Seniors Housing Strategy by changing 'Theme 1: Downsizing' to 'Theme 1: Diversity and downsizing';
2. Support moving from stamp duty to a broad-based land tax, to enable seniors to downsize, provide improved mobility in the market, and a better utilisation of housing stock;
3. Investigate the potential of introducing a moveable public housing units program in Western Australia;
4. Support the development of financial interventions, such as low interest loans, models to assist downsizing (including increased shared equity options), and financing for new and innovative housing models, such as co-housing;
5. Support the introduction of mandatory inclusionary zoning, but that this be social and affordable housing for all income eligible households, not just seniors;
6. Supports local governments to undertake a comprehensive analysis of their local housing needs, including the need for social and affordable housing for seniors;
7. Supports local governments to improve housing diversity and affordability through local government planning controls;
8. Does not support the introduction of a downsizers grant, but focuses on other mechanisms to improve diversity and affordability for seniors.





## Theme 2: Better design

1. Increases the use of universal design and adaptable housing through its construction program, across all projects, to promote community, market and industry acceptance, which in turn can reduce the cost of including these design elements;
2. Promote universal design and adaptable housing to developers, housing providers, local and State government, and the public, to enhance awareness and market and industry acceptance, , which in turn can reduce the cost of including these design elements;
3. Support the improvement of real estate websites to better identify properties with universal design elements;
4. Investigate how government incentives and policy changes can best support the inclusion of universal design and adaptable home modifications to existing and new homes for those with mobility issues, including those living with a disability;
5. Better consider the cultural needs and family obligations of Aboriginal people when designing housing in regional and remote areas.

## Theme 3: Affordability


1. Set a net increase of 2,700 social housing dwellings to be delivered as part of the State Affordable Housing Strategy's 2020 'Aiming Higher' strategy;
2. Support initiatives that stimulate private and institutional investment in social and affordable housing stock, such as a state based initiative similar to the National Rental Affordability Scheme;
3. Develop a community housing growth strategy, in partnership with the community housing sector, which includes targets for long term management transfers as well as title transfers to Community Housing Providers;
4. Complete a review of income and asset limits for social housing, as income limits do not reflect current costs in the housing market;
5. Review the bond assistance program to ensure it is meeting the needs of applicants in the current housing market;
6. Develop specifications and tender for a pilot home-share program.

## Theme 4: Regional communities

1. Continues to invest in Aboriginal home ownership options in remote and regional areas;
2. Supports upgrading housing and infrastructure in remote communities to improve the standard of living;
3. Collaborates with other Government agencies to provide resources to build capacity of Aboriginal Community Controlled Organisations in metropolitan, regional and remote areas;
4. Improves economic viability of home ownership programs in Aboriginal communities, through new home ownership products, to ensure the security of family groups, including seniors.

## Theme 5: Information, support and advice

1. Confirm the importance of support and advice in the Seniors Housing Strategy by changing 'Theme 5: Understanding Options' to 'Theme 5: Information, support and advice';
2. Encourage adequate funding of tenancy advice and financial counselling services to support seniors to access and maintain tenancies;
3. Encourage service integration where possible to ensure easily accessible services for seniors;
4. Support an expanded role for the Seniors Housing Advisory Centre to provide information, support, advice and advocacy for seniors, to enable adequate planning for housing pre-retirement and beyond;
5. Review its communication activities in metropolitan and regional areas, to ensure they are meeting the needs of users, particularly seniors;

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6. In partnership with the Department of Commerce develop and promote education materials and programs relating to 'asset for care', to ensure seniors are not subject to financial loss and financial abuse.

#### Theme 6: Security of tenure

1. Confirms that 'security of tenure' is a critical issue for seniors and consider it as its own theme in the development of the Seniors Housing Strategy;
2. Supports changes to the Residential Tenancies Act (1987) to improve the rental system for older Australians, including introducing longer-term leases and specific protections for the aged;
3. Support the introduction of boarders and lodgers legislation to improve the rights of tenants in this form of accommodation, but also ensure accommodation is still viable for housing providers and homeowners.

#### Other considerations:

1. Formulate the Seniors Housing Strategy for 2017 – 2027 as a stand-alone strategy to ensure there is adequate time for implementation of the principles;
2. Allocate adequate resources to ensure the satisfactory progress of the implementations of Seniors Housing Strategy.

The Housing Authority has a significant opportunity to improve housing situations for seniors. By implementing Shelter WA's recommendations, the Housing Authority can not only encourage a more appropriate housing system for seniors, but also improve the housing system broadly for those on low to moderate incomes, and those otherwise disadvantaged in the housing market.



## Introduction

Australians are living longer than ever before. By 2050, the number of Australians aged 65 and over is projected to double, and those over 84 is expected to quadruple. While many seniors will be housed comfortably as they age, some will find themselves in precarious housing situations, after a lifetime of working, raising families and caring for others. Appropriate housing is crucial for people to remain healthy and stay engaged in the community as they age.

The growth of the ageing population will present challenges for our cities and towns, many of which are already experiencing a severe housing shortage. The National Housing Supply Council (2012) found that there is a shortage of 529,000 homes available and affordable for low and moderate income earners to rent or buy. Projected demand-supply gap using medium household growth and medium supply projections suggest that by 2017 Western Australia will have a shortfall of 61,900 dwellings affordable to households in the bottom 40% of the income scale (National Housing Supply Council, 2011). The WA government recognised the housing shortage in its *Affordable Housing Strategy 2010-2020* and has since committed to generating 30,000 affordable housing opportunities, an increase from the original target of 20,000 outlined in the Strategy. A portion of these are new dwellings, but there will still be a significant shortfall, particularly for the growing number of seniors seeking appropriate accommodation as they age.

Many low-income seniors have been unable to keep up with increasing rents, as their income has not kept pace with housing and other costs. As more seniors are entering retirement as renters or with a sizeable mortgage, there is likely to be strong demand for social and affordable housing. Commonwealth Rent Assistance (CRA) payments are currently made to 26,501 people aged 60 and over in WA (Productivity Commission, 2016). Even after receiving CRA in 2014-15, 41.2% of recipients remained in housing stress, paying more than 30% of their income on rent (Productivity Commission, 2016).<sup>1</sup> In 2003-04, only 12% of older renters were in housing stress.<sup>2</sup> By 2011-2012 this figure increased dramatically to 38% (Bankwest Curtin Economics Centre, 2014). This is an important finding because a significant number of older renters are reliant on government benefits, and these have not kept up with increases in housing and living costs. Among people aged 65 and over, 61.6 % obtain more than half of their income from government benefits (Melbourne Insitute, 2014).

Seniors generally require smaller housing located close to services, transport, care and support, however finding and maintaining suitable housing can be difficult for many seniors (Freilich, Levine, Travia, & Webb, 2014). Securing affordable accommodation can be particularly difficult for seniors who are renting or for those with substantial accumulated debt. There are significant numbers of seniors living in the private rental market, which is often not a suitable housing option for them, due to the short-term nature of leases and frequency of rent increases. Seniors may face considerable risk in the private rental market when owners decide to sell a property with vacant possession or increase rents beyond tenants' ability to pay. Seniors also face other housing insecurity. In recent years, there have been several caravan parks with long-stay facilities that have closed, leaving many seniors without secure accommodation. When the park is sold, residents are left with few alternatives, as they have often spent their savings purchasing a park home, which may be unable to be moved, depending on its age and condition, and current legislative requirements.

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<sup>1</sup> Housing stress refers to households with relatively low incomes and relatively high housing costs. In general, this can be measured as households in the bottom two quintiles of the income distribution paying more than 30 per cent in housing costs (30/40 ratio).

<sup>2</sup> Rental stress is defined as someone paying more than 30% of their income on rent.



## Discussion paper response

The Housing Authority Seniors Housing Strategy discussion paper identifies five key ‘themes’ for discussion. The discussion paper indicates these key themes came through most strongly and frequently during consultations. While the themes identified by the Housing Authority are important, Shelter WA would suggest additional significant issues in our response, issues which were identified through Shelter WA’s Seniors Housing Strategy activities and in research.

This response will address the key themes identified in the discussion paper, and propose additional ideas for consideration.

### Theme 1: Diversity and downsizing

#### What else can you tell us about this issue?

Downsizing is a key issue affecting seniors and was discussed at length during the engagement activities undertaken by Shelter WA to inform the development of the Seniors Housing Strategy. Consistent with the information in the discussion paper, not all seniors mentioned they wanted to downsize, as downsizing may not lead to an improved financial or housing situation for these households.

When it came to Housing Authority properties, there was actually an upsizing preference, with strong support for two or more bedrooms. Many participants in public housing or on the wait list for public/social housing were concerned that properties in which they were currently housed, or would be allocated, only had one bedroom. Many currently living in one-bedroom public housing dwellings mentioned they felt these were inappropriate to their needs. The inability to have other people staying with them, especially family and carers, was the key reason cited for this concern. Not being able to have family stay overnight or longer was causing a few participants to feel isolated.

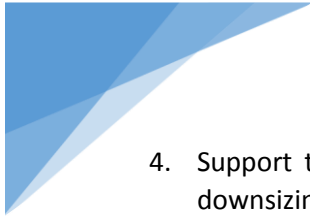
Participants from the ‘Sector Workshop’ on 27 April 2016 cited financial, legislative and emotional barriers to downsizing or ‘right-sizing’. Through the online survey, conducted over July and August, downsizing was the most significant reason given as to why respondents lived in their current home. A few participants mentioned this was to unlock equity in their home, with others also stating the need to have a property which was easy to maintain.

While Shelter WA agrees that ‘downsizing’ is an important consideration for the Seniors Housing Strategy, it must be noted that encouraging ‘diversity’ of housing stock is as important a consideration, as seniors are currently finding it difficult to downsize with the lack of diversity of housing options available in metropolitan and regional areas. Recent research by the Housing Authority, Shelter WA & REIWA shows that over 2013 to 2015 across the Perth metropolitan region, 80% of private housing had three or more bedrooms. Increase the diversity of housing stock is a key requirement before seniors can effectively downsize.

#### What solutions do you think will make a difference?

Shelter WA recommends the Housing Authority:

1. Confirm the importance of housing diversity in the Seniors Housing Strategy by changing ‘Theme 1: Downsizing’ to ‘Theme 1: Diversity and downsizing’;
2. Support moving from stamp duty to a broad-based land tax, to enable seniors to downsize, provide improved mobility in the market, and a better utilisation of housing stock;
3. Investigate the potential of introducing a moveable public housing units program in Western Australia;

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4. Support the development of financial interventions, such as low interest loans, models to assist downsizing (including increased shared equity options), and financing for new and innovative housing models, such as co-housing;
  5. Support the introduction of mandatory inclusionary zoning, but that this be social and affordable housing for all income eligible households, not just seniors;
  6. Supports local governments to undertake a comprehensive analysis of their local housing needs, including the need for social and affordable housing for seniors;
  7. Supports local governments to improve housing diversity and affordability through local government planning controls;
  8. Does not support the introduction of a downsizers grant, but focuses on other mechanisms to improve diversity and affordability for seniors.

How/why will these be effective?

#### Stamp duty reform

Tax receipts from stamp duties and land tax are an important source of revenue for the State. At the same time, tax policies can be effective tools to promote suitable housing supply and encourage affordable housing investment. Tax policies can favour and protect existing asset holders, create barriers to new entrants into the housing market, restrict new supply and stimulate demand, contributing to higher house prices.

Stamp duties have a detrimental impact on residential mobility, housing affordability and efficient use of the housing stock. Research indicates that replacing stamp duty with a broad-based land tax could contribute to the following: downward pressure on house prices; faster development of old industrial sites; easier entry into home ownership for first home buyers; increased supply of private rental accommodation; a reduction in the number of taxes (by one); and removal of a barrier to labour and other mobility (Wood, Ong, Cigdem, & Taylor, 2012).

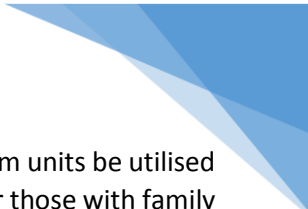
In a recent Australia Institute report, stamp duty calculations on houses listed on [www.realestate.com.au](http://www.realestate.com.au) showed that on average this tax adds an additional \$31,700 to the cost of a house in Perth (The Australia Institute, 2016). Reforming this inefficient tax would be much more beneficial to enable downsizing, and overall housing affordability for many more households across in Western Australia.

#### Movable public housing units

In Victoria, the Department of Human Services have a 'Movable Units' program for older people and people with a disability or support need. These ancillary movable units, similar to 'granny flats', are made available as public housing and a 'hire fee' of 25% of individual income is charged for the unit while in use (Department of Human Services, 2016). The units are self-contained, and can be set up in the backyard of a friend or relative's home, dependent on the unit meeting planning requirements. These units are offered to tenants for as long as they are needed. Residents inform the Department when they are no longer needed, and the Department bears the cost of removal.

The movable units are one- or two-bedroom units provided under the same eligibility criteria as housing allocations for Western Australian public housing, and can be fitted with ramps, grab rails and other modifications to assist in improving accessibility. The property host may be liable for 'upgrading services', including connecting electricity, gas, water to the unit, and clearing the area for the unit. Kids Under Cover, an organisation operating in Victoria and Queensland, also provide this form of accommodation to vulnerable and disadvantaged young people, ensuring young people stay connected to family, education and community. This model can therefore be suited to changing public housing needs as they arise. It could also be an appropriate model for community housing providers.





Based on Shelter WA's consultations with seniors, it is recommended that only two-bedroom units be utilised if this option is to be considered. It is a relatively inexpensive, alternative housing option for those with family and friends who have larger underutilised blocks. It encourages ageing in place, and better support through connection with family and friends.

### Financial interventions

Shelter WA agrees that financial interventions proposed in the Seniors Housing Strategy discussion paper, including improving access to low interest loans; increased shared equity products to unlock equity; and supporting bridging loans would assist with seniors downsizing.

A change in Keystart eligibility criteria for seniors could help support them to access appropriate and affordable housing, even if they are currently home owners. This would need to be done carefully, to ensure the criteria are meeting the needs of those on a low to moderate income. There are likely many existing products that could be tailored to meet the needs of seniors.

### Mandatory inclusionary zoning

Shelter WA believes that mandatory planning incentives for social and affordable housing should be implemented, but not specifically for seniors housing. Having a mandatory requirement for only seniors, means that families, young people, and others who may be struggling in the housing market, will not have the opportunity to access this affordable housing.

Mandatory inclusionary zoning is not a new concept, and was explored by the WA State government in 2013 through its *Planning Provisions for Affordable Housing discussion paper*, which at that time concluded that mandatory inclusionary zoning was overall not supported, and consequently has not been implemented in Western Australia. Shelter WA provided a submission to this paper recommending that mandatory inclusionary zoning be implemented across WA alongside incentives to support developers to deliver the housing. There is evidence that mandatory requirements are well accepted by developers after those sorts of initiative are put in place (Lerman, 2006). While there may be some resistance initially, once mandatory inclusionary zoning becomes part of the fabric of the planning system, developers will adapt to these conditions.

Mandatory inclusionary zoning has worked effectively in many places including the US, UK and parts of Australia. In South Australia, there is a requirement for all new 'significant' developments to include 15% affordable dwellings comprising 10% affordable housing and 5% targeted to high needs households. In WA, the Metropolitan Redevelopment Authority has a requirement of 12% affordable housing for new developments over 10 units, delivered in combination with the Housing Authority and community housing providers. Both the Affordable Housing Policy adopted by the Metropolitan Redevelopment Authority and South Australia's Inclusionary Zoning requirements have been successful in increasing the volume of affordable housing in their jurisdictions, and are often highlighted in academia as beneficial policy interventions (Davison, et al., 2012).

Shelter WA notes that mandatory inclusionary zoning is currently not supported at a state level, with the Housing Authority's Affordable Housing Strategy: Opening Doors to Affordable Housing recommending against its implementation.



## Improve local government planning

Shelter WA believes local governments should be undertaking a comprehensive analysis of their local housing needs, as part of Local and Affordable Housing Strategies. An analysis should include current stock and demographical trends, identifying issues such as the need for more seniors housing and within that the requirements for affordable or social housing for seniors. These strategies should be dynamic documents and used to inform the direction of other strategic and statutory planning instruments including Town Planning Schemes and Strategies.

In 2012, Shelter WA developed a Local Government Guide to Developing an Affordable Housing Strategy. This guide highlights areas where local governments could be doing more to improve the diversity and affordability of housing stock in their local area, with recommendations for different actions which can be undertaken to support the development of social and affordable housing stock. A key element of this guide is recognising that local governments don't just have a role in promoting the development of new affordable housing stock, but can also play a part in retaining the current supply of affordable housing, such as boarding houses and residential parks.

View a copy of the guide here: [Local Government Guide to Developing an Affordable Housing Strategy](#)

Shelter WA believes the retention of existing supplies of affordable housing stock should be a key consideration in the Seniors Housing Strategy, as any efforts to develop new stock could be counteracted by a loss of existing stock. As mentioned previously, in recent years, there have been several caravan parks with long-stay facilities that have closed, leaving many seniors without secure accommodation. When the park is sold, residents are left with few alternatives, as they have often spent their savings purchasing a park home, which may be unable to be moved, depending on its age and condition and the current legislative requirements.

## Ineffective options

### Downsizers' grant

Shelter WA believes that moving from stamp duty to a broad-based land tax, improving financing options, and increasing the supply of social and affordable housing would negate the need for a 'downsizers' grant'. Seniors who own their own homes are often asset rich and cash poor, and therefore improving the ability to unlock their financial asset, and then transition into a more appropriate and affordable home is a better option than introducing a new grant.

A downsizers' grant is likely to inequitably benefit those with greater financial means. The grant will provide additional financial benefit to those who already own their own home. For those who are in less secure housing, including the private rental market, there will be no benefit at all. The First Home Owners Grant is provided to first home buyers, often young people, on the general assumption that these households have little equity and savings. This is not the case for those who would be considered for the downsizers' grant. Anecdotal evidence suggests that builders factor in the benefit of the first home owners grant into the price of new housing. If this downsizers grant was for new housing, this could also potentially occur, negating any beneficial effect.

Another point to mention is that a downsizers grant can only be effective in a market that has a diversity of housing options for seniors to downsize into. Recent research released by the Housing Authority, Shelter WA & REIWA shows that over 2013 to 2015 across the Perth metropolitan region, 80% of private housing had three or more bedrooms. An increase in diversity of housing stock is needed to enable seniors to effectively downsize, before a grant could be of any benefit.



## Theme 2: Better design

### What else can you tell us about this issue?

The need for better housing design for seniors is needed for many reasons, including:

- One in five Australians currently live with a disability (close to 4 million persons) (Livable Housing Australia, 2012);
- The baby boomer generation is currently reaching retirement age, which presents a significant market for age-friendly, liveable designed housing;
- It is estimated that 60% of homes will have someone with a disability, at some point in time (Livable Housing Australia, 2012);
- The family home accounts for 62% of all falls and slip-based injuries, costing \$1.8 billion in public health costs across Australia (Monash University Accident Research Centre, 2008).


In the metropolitan and regional consultations held by Shelter WA to inform the development of the Seniors Housing Strategy, the need for appropriate housing designs was spoken about at length by participants. Housing designs in the private rental market and in public housing were identified as poor and not appropriate. Participants believed universal design should be of greater consideration in all seniors housing, with bathrooms and toilet design being the most significant design concerns. There was concerns that poor design could lead to poor health outcomes and injury.

Having adequate safety and security elements in housing design was also of critical concern. Many in public housing and in private rental stated their house didn't have adequate security features, particularly for those residing in neighbourhoods where they felt unsafe. This was especially true for participants living among other non-senior public housing dwellings.

Some participants were concerned they had made modifications to their public housing dwellings to suit their ageing needs, but at the end of the tenancy the Housing Authority would require them to remove modifications. Participants noted this would be costly, and felt this added value to the Housing Authority properties. Some participants felt that housing improvements should lead to incentives for tenants rather than penalties.

In the Seniors Stakeholder Workshop on 27 April 2016, participants suggested better education is required to inform the public, developers and housing providers about the benefits of liveable design for seniors. Liveable design benefits seniors with mobility issues, people with disabilities and families. Participants also discussed the need to legislate for liveable design standards. As more buildings meet those standards, the costs of achieving liveable design should decrease.

The discussion paper notes as an emerging idea to: '... encourage landlords to modify properties for seniors and adopt universal design for rental dwellings'. Shelter WA believes the inclusion of universal design should be focused in the initial design and build of housing, as research indicates it can be up to 22 times more expensive to retrofit an existing dwelling with key design elements, when compared to inclusion at the design stage (New Zealand Ministry of Social Development, 2009). While it is clear more needs to be done to encourage universal design principles in the private market, it may be effective to provide incentives to ensure adaptable and universal housing is created for seniors.



Shelter WA believes ‘adaptable housing’ should be a key consideration of the Seniors Housing Strategy. An adaptable house accommodates lifestyle changes without the need to demolish or substantially modify the structure or services (Australian Government, 2013). Adaptable houses are designed to enable, for example, a large family home to be modified to two or three smaller units, without significant cost. An adaptable house can be modified to meet the physical needs of the occupant. This may include modifying kitchen joinery, or altering the laundry and bathroom to improve accessibility.

The Australian Government provide information about liveable and adaptable homes on the [YourHome](#) website. The Town of Cambridge has developed a [Housing Options](#) brochure which highlights the potential of adaptable housing in Town.

Appropriate housing designs for Aboriginal seniors, and households which include seniors, should also be a major consideration of the Seniors Housing Strategy. Over 2013-2014 Shelter WA undertook a tenancy training project in regional and remote communities in Fitzroy Crossing. This training was for tenants within communities where housing was under State Housing Management Agreements. While undertaking this training, some people from the Aboriginal communities suggested the housing that was provided under these agreements did not meet the cultural needs and obligations of their household. There is a critical need for appropriate housing for Aboriginal peoples in these areas, including seniors and Aboriginal people over 50 years, who often have early onset of age related health issues often typical of seniors, as noted in Regional Development Council (2016) report.

#### What solutions will make a difference?


Shelter WA recommends the Housing Authority:

1. Increases the use of universal design and adaptable housing through its construction program, across all projects, to promote community, market and industry acceptance, which in turn can reduce the cost of including these design elements;
2. Promote universal design and adaptable housing to developers, housing providers, local and State government, and the public, to enhance awareness and market and industry acceptance, , which in turn can reduce the cost of including these design elements;
3. Support the improvement of real estate websites to better identify properties with universal design elements;
4. Investigate how government incentives and policy changes can best support the inclusion of universal design and adaptable home modifications to existing and new homes for those with mobility issues, including those living with a disability;
5. Better consider the cultural needs and family obligations of Aboriginal people when designing housing in regional and remote areas.

#### How/why will these be effective?

Promoting universal design is important, and there is substantive research acknowledging the benefits of universal housing design for seniors, and those living with a disability, but this has not translated to more housing built with universal design elements.





It is clear from the consultations undertaken by Shelter WA to inform the development of the Seniors Housing Strategy that many current public housing dwellings are not appropriately designed for seniors. Improving the design of social and affordable housing, including through demonstration projects, will assist in achieving market acceptance, while also providing more appropriate housing for those in need. The 'Affordable Housing Strategy 2010 – 2020: Aiming Higher' indicates that a key action is to 'undertake demonstration projects in metropolitan, regional and remote WA to trial new design, construction methods, materials or other breakthrough technology'. Adaptable and universally designed housing could be developed under this action.

Adaptable housing that can be used flexibly throughout its lifespan is also worth promoting and developing, particularly for social housing which may house various cohorts and family types throughout its lifecycle. Adaptable housing adds flexibility to improve utilisation of a house when household structures and lifestyles change. This has relevance for seniors housing. The significant cost of housing modification was highlighted during the metropolitan, regional and online consultations undertaken by Shelter WA.


### Theme 3: Affordability

#### What else can you tell us about this issue?

Housing affordability is a significant concern for seniors, and this was brought out in the consultations held with seniors in metropolitan and regional areas, as well as in the surveys conducted with seniors across the state. Many participants indicated that housing costs were a significant financial burden, especially for those in private rental. When questioned about their top three housing concerns, 83.7% of participants indicated that affordability was the key concern. In Shelter WA's 'Preventing Homelessness Among Seniors' Report, rental costs remain the biggest single driver of financial hardship for a senior living in private rental accommodation on the aged pension, making up 61% of expenses. This report found that a single person on the aged pension in the private rental market had -\$12 each week to live on, meaning they had to potentially cut down on other essentials to be able to afford to pay rent (Shelter WA, 2015).

In the consultations held to inform the development of the Seniors Housing Strategy, 70% of participants were on a Full Aged Pension, with many (39.8%) living in private rental market. Most participants also had very little savings, with 50.8% of participants noting a superannuation balance of less than \$1,000. Many were feeling the stress of high housing costs, especially in regional locations, where housing vacancy rates have not increased and accommodation remains expensive. Some people mentioned that affordability of the lower end of the private rental market had not improved. One participant mentioned *"I receive \$706 per fortnight from Newstart and I pay \$640 per fortnight for rent and it is tough going"*.

The inability to access public housing to ensure security and affordability for seniors should be a concern for the Housing Authority. Income eligibility limits for public housing in WA are the lowest of any State in Australia, and are just under the total weekly income of a single person on an Aged Pension. While Shelter WA acknowledges there are some differences across jurisdictions in the way combined household income limits are assessed for the purposes of housing eligibility which may counter this effect, WA's are still among the lowest in the country and have not, according to our research, been reviewed since 2004, despite the significant increase in the cost of housing over that time. This unrealistically low income eligibility criteria in fact serves to exclude many vulnerable households from eligibility for social housing.



Shelter WA would suggest that diverse living arrangements can improve affordability for seniors. One example is a concept known as ‘home sharing’, which matches older householders, who are looking for practical support and companionship, with people of integrity who are prepared to lend a hand in exchange for inexpensive accommodation. The householder provides a bedroom and shared facilities in exchange for the home sharer providing help and assistance around the home. Broadening Horizons, a Perth-based service, assists women in jointly applying for affordable rental accommodation. Another example of a home sharing service is the Wesley Home Share Advisory Committee in Victoria, funded through Housing and Community Care (HACC). Apart from the economic benefits, the scheme provides increased social connectedness and assists older people to remain in their homes.

The cost of providing an upfront bond may be a concern for low income seniors. In the forum held in Albany, there was a group discussion about bonds in the private rental market. A few participants mentioned it was difficult to afford an upfront bond, with bond assistance from the Housing Authority often not covering the full bond. It was mentioned that it was difficult for seniors who were waiting on bond acquittals – one lady said she had to wait 5 weeks for the bond to be returned. One person suggested having a transferable bond, which could be moved straight over to the new property, could be an option.

Shelter WA also highlights the current inadequacy of Aged Pension and Commonwealth Rent Assistance in meeting housing and living costs of seniors in the private rental market. Inadequate indexation of CRA has eroded its value over time and rendered the payment increasingly ineffective in preventing housing stress in the private rental market.

#### What solutions will make a difference?

Shelter WA recommends the Housing Authority:

1. Set a net increase of 2,700 **social housing** dwellings to be delivered as part of the State Affordable Housing Strategy’s 2020 ‘Aiming Higher’ strategy;
2. Support initiatives that stimulate private and institutional investment in social and affordable housing stock, such as a state based initiative similar to the National Rental Affordability Scheme;
3. Develop a community housing growth strategy, in partnership with the community housing sector, which includes targets for long term management transfers as well as title transfers to Community Housing Providers;
4. Complete a review of income and asset limits for social housing, as income limits do not reflect current costs in the housing market;
5. Review the bond assistance program to ensure it is meeting the needs of applicants in the current housing market;
6. Develop specifications and tender for a pilot home-share program.

As previously noted, many of the interventions to assist with downsizing will also improve affordability of housing for seniors.



## How/why will these be effective?

### Social and affordable housing

The current lack of secure, appropriate and affordable housing is currently placing many low to moderate income seniors in mortgage and rental stress. In 2014, there were approximately 40,000 older person households<sup>3</sup> in mortgage stress and another 55,000 in rental stress (Bankwest Curtin Economics Centre, 2014). Shelter WA believes that a primary way to improve housing affordability for seniors on a low to moderate income is to increase the supply of social and affordable housing. Shelter WA believes that the State government should continue to invest in the development of social housing. The current economic downturn in Western Australia offers a unique opportunity for Government to maximise investment in social and affordable housing at reduced cost, whilst providing a stimulus to the economy.

The Housing Authority has taken positive steps to address the State's affordable housing needs. In 2015 it achieved the target set under the *Affordable Housing Strategy 2010-2010: Aiming Higher*, to develop 20,000 affordable housing opportunities by 2020, and endorsed a higher minimum target of 30,000 by 2020. Whilst 27% of the first 20,000 dwellings constructed were social housing, this did not lead to a net increase of 5,400 dwellings as some public housing was retired or sold off during this time. The Social Housing Investment Package (SHIP), is an important initiative under the Strategy to deliver 1,000 additional social housing dwellings by June 2017, with these targeted for families with children and seniors. There is a great need for more social and affordable housing in WA, and Shelter WA believes there is a significant opportunity to meet that need in the current fiscal climate and economic downturn.

### Community housing


There is an opportunity for government to utilise the community housing sector to drive new supply and inject new capital to increase the State's social housing stock. This investment could be combined with redevelopment of existing underutilised and declining Housing Authority assets, to increase both social and affordable housing in the state. 'Non-government housing providers are locally based organisations that can respond quickly to the needs of tenants and be more flexible about how they manage their resources' (Department of Family and Community Services, 2016). Western Australia does not have a community housing growth strategy. Whilst the WA Affordable Housing Strategy, 2010-20 includes a strategy to finalise and implement a Community Housing Sector Strategy and associated initiatives that capitalise on the strengths of the not for profit sector and increase its delivery role, there is currently no strategic framework to guide growth. The Housing Authority has agreements with eight housing providers to deliver an additional 496 houses by 2020, however the Community Housing Industry Association (CHIA) advises there is greater capacity by CHPs to accept further transfers and these transfers will be a catalyst for greater growth in housing stock. Without a scaled-up community housing sector, Western Australia will be in a poor position to access social housing investment mechanisms that may be implemented by the Commonwealth Government. These were recommended in a recent Australia Government report to Heads of Treasuries (Australian Government, 2016).

### Institutional Investment

Shelter WA suggests an enabling environment for institutional investment is needed across Australia, but can be supported by actions in WA. Taxation incentives can encourage investment in affordable housing, and can be promoted. A State-based incentive similar to the National Rental Affordability Scheme (NRAS) could help improve overall affordability for seniors, and can assist in developing more diverse housing options across the State. These NRAS-like incentives could be earmarked to provide affordable rental accommodation with security of tenure for seniors, for 10 years, which was the timeline for the benefits paid for NRAS.

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<sup>3</sup> Head of the household being 55 years or older.



There are other ways the State Government can also increase investment in affordable rental housing. Internationally, government backed ‘housing supply bonds’ have been effective in channelling institutional and retail investment in affordable and social housing, and Shelter WA believes these could also be effective in WA. Research undertaken by the Australian Housing and Urban Research Institute (AHURI) suggests the housing supply bond model has the potential to direct a significant amount of superannuation investment and retail investment into low-cost loans which could then be made available to not-for-profit community housing organisations for housing development.

The bonds are attractive to investors because they are promoted with a mixture of tax incentives and government guarantees (Lawson, Milligan, & Yates, 2012). An independent Parliamentary Budget Office costing suggested the housing bonds scheme could create 7,200 new homes per annum through an initial investment of only \$25 million for the first year and then \$145 million over forward estimates (Parliament Budget Office, 2013). While these estimates are based on implementation at the Federal level, housing supply bonds could also be issued as State Bonds.

There are numerous examples where state governments in the US have utilised bonds for social purposes such as affordable housing. In the US, both state and local governments sell tax-exempt ‘Multifamily Housing Bonds’ which are used to finance the development of apartments at rents affordable to low income families (Lawson, Milligan, & Yates, 2012).

## Theme 4: Regional Communities

### What else can you tell us about this issue?

During the consultations undertaken by Shelter WA on behalf of the Housing Authority, it was noted that seniors in some regional areas face challenges due to the distance from appropriate and essential services, as well as due to the limited equity in their homes. Depending on the region, there may be a greater need for social housing for seniors, more aged care facilities, and/or services to assist people to remain in their homes for as long as possible.

As indicated in the Regional Development Council’s report ‘Ageing in the bush: An ageing in place strategy for Regional Western Australia’ projected increased numbers of older Australians in regional areas will be greater than in the Perth metropolitan area. The report highlights there is a need to ensure that for economic and social reasons, it is critical that seniors are able to age in place, and don’t need to travel out of community to get the care and services they require (Regional Development Council, 2016). The report identifies the importance of housing to the ageing, with three of four ‘planks’ for holistic support and care being housing, community aged care and residential aged care.

In 2010, Shelter WA and the Aboriginal Legal Service of WA (ALSWA), provided a submission to the former Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA). This report found that the state of housing and infrastructure for Aboriginal peoples in WA was (as it continues to be) in crisis, and has been for some time. This is especially true in remote communities where overcrowding is widespread and houses are generally in poor condition, with a backlog of repairs and maintenance required and, in some instances, demolition. The need to address Aboriginal and remote housing and servicing must be a consideration of the Seniors Housing Strategy.





## What solutions will make a difference?

Shelter WA recommends the Housing Authority:

1. Continues to invest in Aboriginal home ownership options in remote and regional areas;
2. Supports upgrading housing and infrastructure in remote communities to improve the standard of living;
3. Collaborates with other Government agencies to provide resources to build capacity of Aboriginal Community Controlled Organisations in metropolitan, regional and remote areas;
4. Improves economic viability of home ownership programs in Aboriginal communities, through new home ownership products, to ensure the security of family groups, including seniors.

Better housing design, as outlined in Theme 2 will also benefit Aboriginal peoples, including seniors and those with early onset ageing.

### How/why will these be effective?

#### Building the capacity of Aboriginal Community Controlled Organisations

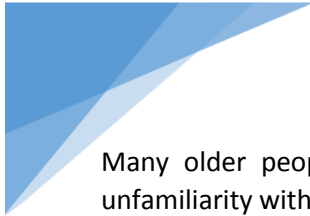
Shelter WA suggest that more must be done to advance self-determination of Aboriginal peoples in Western Australia, through supporting Aboriginal-controlled and designed service delivery of therapeutic healing, intensive family support and child protection. This will assist to increase education and employment opportunities, improve health outcomes, and address social issues in Aboriginal communities, reducing Aboriginal disadvantage and bridging the gap.

## Theme 5: Information, support and advice

### What else can you tell us about this issue?

Shelter WA believes this theme should be reframed as 'Information, support and advice' as the given description does not adequately address the support or advice that is often critical to ensuring seniors can access secure, appropriate and affordable accommodation. Also, it is only briefly acknowledged through the Discussion Paper that there is an increasing cohort of vulnerable seniors who are at risk of homelessness and in need of support and advice. For many seniors at risk of homelessness, early intervention strategies will be more valuable and efficient than providing supports and interventions if they become homeless. Early intervention aims to assist people in housing stress or at vulnerable life transitions, to sustain or obtain a tenancy. Models of early intervention are largely premised on ideas that people present with risk factors, vulnerabilities or have common pathways into homelessness (Petersen, Parsell, Phillips, & White, 2014) and that interventions at this stage can diminish the need for more reactive services at a later date.

Specialist Homelessness Services in WA provide a range of early intervention, crisis and transitional accommodation through outreach services. Some programs target specific cohorts such as women experiencing family violence or youth. While most services do not exclude older people, they may not cater to the specific needs of older Australians. An exception is St. Bartholomew's House in East Perth combining residential aged care, transitional housing and outreach services to people experiencing, or at risk of, homelessness.



Many older people have difficulty in seeking services and asking for assistance. This may be due to unfamiliarity with the social services system or the stigma attached to asking for help. Additionally, continuity of support is essential, since episodic care based around discrete crises is inefficient and ineffective (Petersen & Jones, 2013), particularly where there are complex or multiple issues. In this regard, having integrated servicing for seniors is important. An example of integrated service is Footprints in inner Brisbane, which provides street outreach to older people sleeping rough and living in boarding houses (Petersen & Jones, Addressing Later Life Homelessness, 2013). After securing accommodation for clients, Footprints provides ongoing support to assist clients with complex needs.

The Seniors Housing Advisory Centre in WA is a joint initiative between the Department of Commerce and COTA WA aimed at providing information and referrals to seniors to assess their housing options as they age. In addition to information and referrals about housing options, many seniors also require financial counselling to maintain their housing or access alternative accommodation. Financial counselling services in WA have recently seen significant cuts to funding. Access to financial counselling services is often essential for low income earners, including seniors, to maintain their housing.

Tenancy services focused on seniors who are at risk of homelessness could also help stabilise tenancies and prevent homelessness. The Housing for the Aged Action Group in Melbourne provide a variety of services including a tenancy service which focuses on private renters and assists tenants when they leave their accommodation, with obtaining bond refunds, support in disputes with landlords and assistance in accessing new accommodation (Petersen & Jones, Addressing Later Life Homelessness, 2013). Importantly this service advocates on behalf of seniors to assist them in achieving housing outcomes sooner.

There is a key need for more informed advice, not just information, for seniors about housing contract matters. Analysis of 1,816 contacts to the Seniors Housing Advisory Centre highlights some key concerns for seniors. 83% of contacts were initiated by consumers, with most contacts (54%) pertaining to retirement villages. This indicates an urgent need for increased public education and enhanced consumer awareness about retirement villages contracts, fees, and regulations. The Seniors Housing Advisory Centre does not provide advice to callers on individual contract matters, however Shelter WA believes there is a definite need for this type of service in WA, given the prevalence of issues relating to retirements villages, long-stay residential parks and assets for care.

During Shelter WA's consultations to inform the development of the Seniors Housing Strategy, participants discussed the need for reliable, impartial financial advice to assist people to plan their retirement housing and make informed decisions. Many seniors, particularly single women, are retiring with insufficient superannuation and will require some form of financial assistance to meet their housing needs if they do not own their own home.

In terms of understanding housing options and being able to effectively plan, Shelter WA believes the Housing Authority could improve its communications practices with tenants and those on the waiting list. During the consultations, participants raised issues relating to communication with the Housing Authority numerous, noting an inability to successfully contact the Housing Authority to discuss issues. Some who had managed to speak directly to a Housing Authority officer considered their concerns were not taken seriously. Clear communication is essential for seniors, who may find it more difficult to access information, support and advice systems, particularly online services and information.



## What solutions will make a difference?

Shelter WA recommends the Housing Authority:

1. Confirm the importance of support and advice in the Seniors Housing Strategy by changing 'Theme 5: Understanding Options' to 'Theme 5: Information, support and advice';
2. Encourage adequate funding of tenancy advice and financial counselling services to support seniors to access and maintain tenancies;
3. Encourage service integration where possible to ensure easily accessible services for seniors;
4. Support an expanded role for the Seniors Housing Advisory Centre to provide information, support, advice and advocacy for seniors, to enable adequate planning for housing pre-retirement and beyond;
5. Review its communication activities in metropolitan and regional areas, to ensure they are meeting the needs of users, particularly seniors;
6. In partnership with the Department of Commerce develop and promote education materials and programs relating to 'asset for care', to ensure seniors are not subject to financial loss and financial abuse.

## Additional Significant Themes


### Theme 6: Security of Tenure

For seniors in the private rental market, greater security of tenure is necessary, to provide stability, financial security and to increase well-being and quality of life. In the stakeholder workshop held on 27 April 2016, were different opinions were offered on ways this could be achieved, i.e. through legislation, state-based rent assistance. Although physical security was not a major topic of discussion at length at the organisational workshop, it was critical for seniors who participated in Shelter WA's subsequent consultations, as noted previously. Physical security was a major concern for tenants in both private rental accommodation and public housing.

Security of tenure is a priority for older people, as stable accommodation provides discernible health, social and economic benefits (Freilich, Levine, Travia, & Webb, 2014). A risk of homelessness heightens the likelihood of adverse physical and psychological health implications in both the short and longer term. Furthermore, relocation that takes place without regard to the personal preferences of older people gives rise to feelings of powerlessness. Insecure accommodation may result in older persons being more reluctant to engage in their local communities, and if forced to relocate may result in the loss of existing support and friendship networks (Freilich, Levine, Travia, & Webb, 2014), as well as financial costs associated with moving, such as removalist costs, essential services set up costs etc.

Seniors may face considerable risk in the private rental market when owners decide to sell a property with vacant possession or increase rents beyond the tenants' ability to pay. In recent years, several caravan parks with long-stay facilities have closed, leaving many seniors without secure accommodation. When the park is sold with a view to redevelopment, residents are left with few options, as they have often spent their life savings purchasing a park home, which may then be unable to be transported, depending on its age and condition, as well as current legislative requirements.

Some seniors may not be concerned about the tenure of their housing (rental/owner, public/private), as long as their housing costs are affordable and they are not forced to move. In WA, the Residential Tenancies Act (RTA) was amended in 2013, providing more security for renters. The RTA Amendments included several important changes to strengthen protections for tenants and improve safety of rental accommodation, including stipulating the timing and method of calculating rent increases. However, industry norms continue to favour 12 month leases, with rent increases on a six months or annual basis.



Boarders and lodgers were not included in the RTA amendments and continue to sit outside the Act. Seniors in boarding houses or in lodging arrangements (either as renters or as landlords renting out rooms in their own homes) require more security and certainty in relation to such arrangements. With legal protections in place, this arrangement could suit many seniors to (a) either remain in their home and rent out a room to someone else, or (b) by renting a room in someone else's home.

Many seniors and other low income tenants require greater security in the rental sector with options for long-term leases. In many European countries, renting is the norm, with long-term leases in place and strong tenant protections. For example, in Germany rent increases are capped and landlords who overcharge can be fined. In addition, notice requirements vary according to how long a tenant has lived in the property. Elderly long-term tenants are also protected since landlords have to make a strong case for their eviction and are required to either pay compensation or assist with relocation (Shaw, 2014).

Seniors in lifestyle villages and caravan parks also require improved security in their lease agreements. Lifestyle villages and caravan parks can provide a more affordable form of accommodation than the alternatives for some seniors. However, in addition to the initial investment, the ongoing rental and maintenance costs can be prohibitive. The Park Home Owners Association of WA notes that rents in these types of sites are increasing to a point where members are forced to place their homes on the market and apply for social housing (Freilich, Levine, Travia, & Webb, 2014).

With many caravan parks closing in WA, residents are left with few alternative housing options. The WA Department of Commerce is conducting a review of legislation affecting long stay residents in caravan parks. Any changes to such legislation should ensure transparency and accountability in the administration of caravan parks, and protect seniors forced to move when caravan parks are sold.

Security of tenure was noted extensively throughout Shelter WA's consultations with seniors. In the online survey that was held, 42.3% of responses suggested that 'ability to stay in accommodation long term' was the main reason they preferred to live in their own homes.

Shelter WA recommends the Housing Authority:

1. Confirms that 'security of tenure' is a critical issue for seniors and consider it as its own theme in the development of the Seniors Housing Strategy;
1. Supports changes to the Residential Tenancies Act (1987) to improve the rental system for older Australians, including introducing longer-term leases and specific protections for the aged;
2. Support the introduction of boarders and lodgers legislation to improve the rights of tenants in this form of accommodation, but also ensure accommodation is still viable for housing providers and homeowners.

## Other Considerations

### Implementation

Shelter WA is concerned that the wording of the Discussion Paper suggests that the Seniors Housing Strategy is only to complement the Affordable Housing Strategy, which is set to expire in 2020. This doesn't provide adequate time for implementation of many proposed policy reforms and interventions.

Shelter WA recommends the Housing Authority:

3. Formulate the Seniors Housing Strategy for 2017 – 2027 as a stand-alone strategy to ensure there is adequate time for implementation of the principles;
4. Allocate adequate resources to ensure the satisfactory progress of the implementations of Seniors Housing Strategy.





## Location and servicing

During the metropolitan and regional consultations to inform the development of the Seniors Housing Strategy, access to services was deemed very important for participants. Some participants were concerned they could only afford housing in areas of poor amenity and were therefore unable to easily access health services. In some instances, they found it difficult to undertake weekly activities, such as grocery shopping. This was an issue for those in the metropolitan area, but was more significant for regional locations. Participants unsurprisingly preferred areas of high amenity, giving them easy access to services. They also strongly desired good access to public transport. Participants who had easy access to public transport valued it significantly. Participants without access to services felt socially isolated.

In regional areas location and accessibility were robust discussion points. Participants noted that while proximity to services and facilities, accessibility, and public transport were good when housing was near the town centre, they were poor and inadequate further out of town. Coincidentally this is where more affordable accommodation was located. A lack of public transport and walkability led to a feeling of isolation. It was raised that there wasn't adequate consideration for the transport requirements of new seniors housing. It is pertinent that the Housing Authority consider location and servicing in the development of its seniors housing, especially in regional areas.

## People living with a disability

The Discussion Paper only briefly discusses the housing needs and preferences of seniors living with a disability, even though it does propose some themes that will benefit those living with a disability. In 2012, it was estimated that 43% of those over 55 are living with one or more disabilities (Australian Bureau of Statistics, 2013). Meeting the needs of seniors living with a disability must be a critical consideration in the development of the Seniors Housing Strategy.

Seniors who are living with a disability often require:

- Purpose built housing, or modifications to existing dwellings to include universal design elements;
- Additional bedrooms for live-in carers;
- Easily accessible services.

## High needs groups

The extent to which the Seniors Housing Strategy may also meet the housing needs and aspirations of high needs groups is not explored in depth. Those living with mental health issues, or marginalised groups, such as Aboriginal persons, will require housing and specific supports. These groups often require wrap around services to support them to sustain tenancies, and other supports to address other presenting or emerging issues.

## Multi-age precincts

During the Sector Workshop on 27 April, participants discussed the size, scale and necessary regulations of multi-age precincts. There was robust discussion about high-density living, and the necessity for 'density done well' (including affordable housing options), with the need for quality construction and a healthy social mix to facilitate community living. People questioned how it would be possible to integrate social housing within these precincts, and supported the notion of prescribing 20 per cent social housing within a development area.



## Conclusion

Shelter WA commends the Housing Authority for its efforts in developing a strategy to address housing issues experienced by seniors, and welcomes the opportunity to submit a response to the *Discussion Paper*.

Australians are living longer than ever before. By 2050, the number of Australians aged 65 and over is projected to double, and those over 84 is expected to quadruple. Therefore, the anticipated demand for seniors housing is a significant issue that is likely to worsen as the 'baby boomer' and later generations age.

Shelter WA's response to this discussion paper is based on sound research and consultations with key stakeholders. Consultations were held in metropolitan and regional areas, and a stakeholder workshop co-hosted with CoTA WA and ACSWA, including 14 participants from the Housing Authority, at least 13 from the Community Housing Sector, seven from local government or other government agencies, five from private industry, and a range of representatives from social service organisations, including seniors' advocates, housing support, and aged care. In addition surveys were undertaken with senior housing consumers and service providers.

Shelter WA generally agrees with the analysis undertaken in the discussion paper, but would also suggest that security of tenure have a greater emphasis within the proposed Strategy. While affordability for seniors' housing is important, having the ability to remain in accommodation long term is often as vital to seniors' health, well-being and financial stability. Seniors face many housing insecurities, and this is especially relevant in the private rental market, which is generally not a suitable form of accommodation for this cohort. Other forms of insecure accommodation include caravan/residential parks, which are becoming a significant destination for retirement, but are often closing as other forms of development become more profitable.

Shelter WA believes the Housing Authority has a significant opportunity to improve the lives of seniors through the development of particular programs within the Seniors Housing Strategy. Shelter WA hopes to continue its engagement with the Housing Authority to ensure secure, appropriate and affordable housing for vulnerable seniors, in particular for those on a very low to moderate income, in WA.

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