

Submission to the Parliament of Victoria Legal and Social Issues Committee

Inquiry into the retirement housing sector

30 June 2016

1. About us

The Australian Association of Gerontology (AAG) is Australia's peak national body linking professionals working across the multidisciplinary fields of ageing. Since 1964, we have connected professionals to help them connect and collaborate on evidence based approaches to improve the experience of ageing. With over 1,000 members across every State and Territory in Australia, our members include researchers, geriatricians, nurses, allied health professionals, aged care practitioners, policy makers and other gerontology experts. AAG has 17 Collaborating Research Centres that represent all major research in ageing in Australia.

2. Background information

The Australian Bureau of Statistics reports that in 2011: ¹

- 3.1 million Australians were aged 65 years and over. They accounted for about 14% of people in Victoria.
- 2.7 million (94%) older people lived in private dwellings. Of these, 2.1 million (78%) lived in a separate house, 269,100 (10%) lived in semi-detached, row or terrace houses, and 275,600 (10%) lived in flats, units or apartments.
- Among those aged 65 years and over 135,900 people lived in retirement villages, with almost two-thirds of this group being women.
- Around 22,800 older people lived in a caravan, cabin or houseboat.
- 56% of older people lived with a spouse or partner and 25% lived alone.
- 69% of older people lived in major urban areas, and almost 25% lived in other urban areas such as smaller cities and towns.
- 19% of older people had a need for assistance with one or more of the core everyday activities of self-care, mobility and communication.

There are over 2,200 retirement communities across Australia which provide accommodation to over 170,000 people aged over 55.² These include retirement villages, self-care units, independent living units, retirement apartments, seniors' housing and lifestyle villages. Two thirds of retirement community residents are women.³

In 2011, 180,300 older people lived in non-private dwellings. The leading two types were nursing homes (67%) and accommodation for the retired or aged (not self-contained) (25%).⁴



AAG

Australian
Association of
Gerontology

RHS SUBMISSION 696

Suite 8, 322 St Kilda Road
St Kilda Victoria 3082
www.aag.asn.au

P +61 3 8506 0525
E enquiries@aag.asn.au

ABN 62 162 569 986

Some of these dwellings are located within retirement villages but the distinction is that aged care services are included as part of the package, along with the accommodation. In other forms of retirement housing, aged care services are provided and paid for separately from the accommodation.

By 2054-55 there are projected to be 7 million Australians (18% of the population) aged 65-84 and 2 million Australians aged over 85 (5% of the population).⁵

GENERAL COMMENTS

3. The policy challenge

The policy challenge for housing an ageing population is how to sustain and enhance well-being across an individual's life, while at the same time reducing the inequalities within each generation, and ensuring an equitable allocation of resources between the generations.⁶

4. Older people want to age in the place that is right for them

Research by A/Professor Briony Dow (AAG Board Member) and others on "*What do older Australians want?*" found that one of the strongest messages to come through was that older people wanted to be supported to stay at home as long as possible.⁷ Earlier research has found that much of this desire to age in place related to emotional and social attachment to their locale rather than to their specific dwelling.⁸

5. The right housing helps people to age well

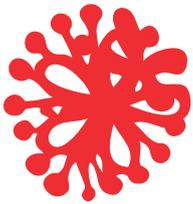
Home becomes more important to older people's quality of life as they spend more time in and around their residences. The physical environment can help older people compensate, optimise and adapt as they develop health issues and sustain losses.⁹

Example

An intensive cross-sectional survey by Professor Julie Byles (AAG Member) and others, involving in-home observation and interviews with 202 participants (75–79 years), showed significant correlations between perceptions of housing and neighbourhood, and 'SF-36' and 'disability' scores.¹ However, many homes failed objective adaptability and safety ratings, particularly bathrooms (80% did not have a shower grab rail, 77% did not have non-slip floors), and 27% of homes scored 8 or more out of 25 possible hazards.¹⁰

¹ SF-36 health-related quality of life and Late Life Function and Disability Instrument scores

AAG acknowledges the traditional land owners of Australia and we welcome all Aboriginal and Torres Strait Islander people in our activities. AAG aims to improve equity in access to services and support for ageing Aboriginal and Torres Strait Islander people.



6. Some people may move house in older age to achieve a more supportive housing environment

Older people may move to other forms of housing as they age, seeking lower maintenance and more supportive housing, and to be closer to social networks, activities, transport and facilities, and in-home support.

A 2013 study by Dimity Crisp and Tim Windsor (AAG Members) and others found that a combination of stressors and opportunities may contribute to decisions to move in older age. Factors that were most likely to encourage relocation to a retirement village included provision for continuing health care needs, home maintenance support and the convenient location of facilities.¹¹

Example

A recent study observed 161 older people who moved into an independent but supported living environment, and compared them to 33 older people staying in their original homes. The residents who moved showed improvement in depression, perceived health, aspects of cognitive function and reduced functional limitations, while the control group showed worsening functional limitations.¹²

7. Older people want to downsize

A 2015 survey of over 4,000 households in Western Australia, New South Wales and Queensland conducted by Bankwest Curtin Economics Centre concluded that Australia's housing stock is not meeting the needs of older Australians. Key findings included:¹³

- Around 16% of 55-64 year olds and 25% of those aged 64+ had already downsized.
- The most common reasons for downsizing were to live in a smaller house that is easier to maintain, to reduce housing costs, or to reduce the size of the garden.
- Of those who had not already downsized, 80% said they would downsize in future.
- 58% thought the costs of downsizing were too high.
- 44% did not believe there were enough *affordable* housing options in the area they would want to live, with a similar proportion believing there were not enough *suitable* housing options.

8. Some older people rent

In 2011, 1.88 million (60.5%) of Australians aged over 55 owned their own home outright.¹⁴ Although this figure represents a decrease of 5% since 2006, most older people still prefer freehold options for their retirement housing if they can afford it. Freehold downsizing options are important.



In 2011, 336,000 Australians aged over 55 rented privately. Although the absolute number of older people who rent is relatively small, this figure represents an increase of 43% since 2006. Affordable housing options for older renters are becoming increasingly important too.

Affordable rental is likely to be a particular problem for single older people, particularly divorced older women who do not have the housing equity that comes with combining the assets of a couple. Among women born 1946-51 in the Australian Longitudinal Study on Women's Health, 15.7% were divorced or separated, 7.3% were widowed, and 3.3% were never married.¹⁵

9. Some older people face homelessness

Increasing numbers of older single women are facing homelessness, or are living in precarious housing arrangements. Other women may be staying with friends, living in cars, or living in unsafe relationships.¹⁶

A 2014 study by AHURI found that:¹⁷

- The number of older people experiencing homelessness in Australia is on the rise. While the rate remained at 14% in the 2006 and 2011 Census, this must be viewed in the context of the growing numbers of older people. There are also a growing number of older people in housing crisis (who are not statistically defined as homeless).
- The nature of older people's homelessness is distinctive. A growing number of people are experiencing homelessness for the first time in their later years.
- Older women are particularly vulnerable to homelessness.
- The breakdown of family housing arrangements has links to older people's homelessness. We need to understand the role of carer stress, intergenerational conflict and elder abuse in the development of housing crises for older people.
- The essential component of prevention and rapid response for older people who are homeless or at risk of homelessness is affordable appropriate housing.
- In many cases the most appropriate response is social housing. In the absence of social housing, affordable private rental may be the only option.

10. Location matters

Dr Helen Feist (AAG President) has reported that one important aspect that shapes an older person's experience of ageing is the availability of resources where they live, including both basic services such as shops, transport and medical care, and life-enriching resources such as family, friends and social opportunities.¹⁸



For older people living in cities, analysis by the Retirement Living Council identified:¹⁹

- strong demand for seniors housing in the middle ring suburbs of most capital cities.
- an apparent mismatch of where supply and demand is located for age-specific housing.
- a trend of seniors moving further away from the central business district to urban fringe locations, where service provision and support infrastructure is poor.
- this movement could be due to factors including affordability and availability of appropriate housing options.

The majority of today's older rural and regional Australians want to age in the location where they are living now.²⁰ One study found that when older people had to move away from their rural communities, it drastically lowered their life expectancy.²¹ However, providing access to key services and resources (described above) is more problematic in rural and regional areas.

11. Diverse housing required

A diversity of retirement housing options is required, so that older people can make a decision that is right for them about where they live, what type of home they live in, whether they buy or rent, the support services they need, and the community setting that enables them to stay as active and autonomous as possible.²² To achieve this diversity, governments will need to engage with both the not-for-profit (NFP) and the private sector, and support innovative retirement housing and financing models.

Example

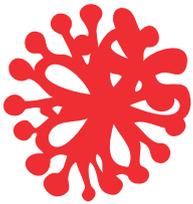
Community land trusts (CLTs) are an innovative retirement housing model. Under this model, the land is held in perpetuity by a NFP CLT. The older person purchases the dwelling but occupies the land through a 'ground lease.' Resale is controlled by a formula that controls capital gains and preserves affordability.²³

12. Whole-of-government approach required

The Australian government, all state and territory governments, and the over 500 local government bodies all play a role in the policies and practices that affect retirement housing. Although AAG welcomes this inquiry, we believe that a comprehensive national review is required. Looking at Victorian laws in isolation will result in duplication of effort and piecemeal policy, which may result in unintended and inequitable outcomes.

Example

The Queensland government has established an *Advisory Taskforce on Residential Transition for Ageing Queenslanders* and is currently conducting consultations on the same issues as this inquiry.²⁴



AAG supports the Productivity Commission's 2011 recommendations that:

- the Council of Australian Governments (COAG) should develop a strategic policy framework for ensuring an adequate level of affordable housing is available to cost effectively meet the demands of an ageing population.
- State and territory governments should pursue nationally consistent retirement village legislation under the aegis of COAG.²⁵

13. Ageing research and evaluation required

In 2010, AAG nominated the housing needs of older Australians as its *Hot Topic* for research, and convened a series of seminars and workshops across the country throughout the year. AAG produced a [Position Statement](#) distilled from these events, which identifies five research priorities:²⁶

- Greater support for research into how current housing stock can be made more age-friendly, including through home modifications that are practical and affordable to older people on low incomes.
- Greater research and investment into age-friendly public housing to ensure vulnerable older people from disadvantaged backgrounds have secure, affordable and suitable places to live.
- Further investigation of the expanding role of service integrated housing in providing options situated between community care and residential aged care, with principles and guidelines developed to ensure access for older people with low incomes and low assets, and those living in rural and remote communities.
- Research into why homeless older people and those in insecure housing appear reluctant to take up services, despite Government initiatives to engage them.
- Continued support for multidisciplinary research into relationships between population ageing and trends in housing demand to provide a robust evidence base to inform policies that are responsive to the housing needs of older Australians over the coming decades.

A comprehensive literature review conducted by Barbara Squires (AAG Board Member) and others in 2014 noted that it has been ten years since the last substantial body of work on retirement communities was completed, and concluded that further research is required.²⁷ It identified ten important topics for which the research evidence at present appears to be limited.

Funding is required for ageing research and evaluation that will deliver evidence-based improvements to retirement housing options. This type of research and evaluation requires a multidisciplinary approach that involves collaboration across relevant areas (such as medical, psychosocial, allied health, finance, technology, design and policy). However, just 'doing the



AAG

Australian
Association of
Gerontology

RHS SUBMISSION 696

Suite 8, 322 St Kilda Road
St Kilda Victoria 3082
www.aag.asn.au

P +61 3 8506 0525
E enquiries@aag.asn.au

ABN 62 162 569 986

research' is not enough. Funding is also required to support knowledge transfer, and the translation of research into policy and practice. Further information is available in AAG's recent [submission to the Medical Research Future Fund](#).

14. Addressing inequity among older people with special needs

Older people with 'special needs' are defined in section 11.3 of the [Aged Care Act 1997](#) and include people: from Aboriginal and Torres Strait Islander communities; culturally and linguistically diverse backgrounds; who live in rural or remote areas; who are financially or socially disadvantaged; and lesbian, gay, bisexual, transgender and intersex people. We regard people with living dementia (see further information below) or disabilities as having special needs. We also consider that the intersection of ageing and gender requires special consideration. Research shows that many older women live in permanent poverty.²⁸

AAG believes that older people with special needs should have equitable access to appropriate retirement housing. However, there are additional challenges in providing appropriate retirement housing for older people with special needs and their carers. Careful consideration and appropriate government funding will be required to develop housing and support services that are tailored to their needs.

Example

The National Disability Insurance Scheme (NDIS) has developed a framework for [specialist disability housing](#). However, not all older people living with disabilities will be eligible for NDIS funding.²

Example

Uniting AgeWell is the first large, faith-based aged care provider in Australia to be recognised for its commitment to providing inclusive services to the ageing LGBTI community by achieving *Rainbow Tick Accreditation* (quality standards set by Gay and Lesbian Health Victoria).²⁹

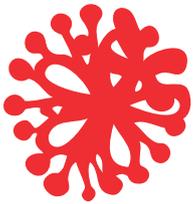
15. Support for people with dementia

A 2014 study by A/Prof Christine Stirling (AAG Vice President) and others for AHURI found that:³⁰

- The number of people with dementia living in public housing is expected to increase from 8,957 people in 2011 to 31,672 in 2050, and the number living in private rental housing is expected to increase from 11,756 people in 2011 to 41,570 in 2050.

² The National Aged Care Alliance is in the process of drafting a discussion paper on the *Ageing and Disability Interface*.

AAG acknowledges the traditional land owners of Australia and we welcome all Aboriginal and Torres Strait Islander people in our activities. AAG aims to improve equity in access to services and support for ageing Aboriginal and Torres Strait Islander people.



- People with dementia find changes in their living and care environment distressing. Those in stable and secure accommodation can live well for longer periods in the community than those who are not in this situation.
- Timely access to home modification is critical in enabling people with dementia to remain in their homes and retain quality of life. However, this is a challenge for public and community housing providers with limited resources, and landlord refusal in the private rental market.
- Understanding of the condition of dementia and appropriate pathways for support is limited in the social housing and homelessness sectors. Increasing this understanding is important in enabling service providers to respond appropriately.
- In Australia the availability of service-integrated (i.e. housing that entails onsite support) is limited. In particular, there is a lack of appropriate, affordable housing for people with dementia who are experiencing housing and financial insecurity. Without this, there can be a push towards transition into residential aged care.

Example

Service integrated housing is continuing to evolve, with providers combining user-pays and subsidised funding to deliver increased services in assisted living apartments. Some innovative examples are the Abbeyfield Housing and Apartments for Life models.³¹

16. Intergenerational issues

AAG's [Hot Topic for 2016](#) is about the complexities of intergenerational issues that should not be ignored. In the housing space, this is most often emotively couched in terms of intergenerational inequity, with the system being skewed towards older people at the expense of younger ones. However, we believe there needs also to be more active consideration of the positive civic, economic and social contributions of older people to community and society. As discussed above, the right housing can enable older people to age well and continue to contribute for longer. Further, many of the specific recommendations that we make below provide a 'win win' solution that will benefit both older and younger generations (such as secondary dwellings, land tax, universal design and consumer protection).

17. Age-friendly cities and communities

Although the terms of this inquiry are focussed on improving retirement 'housing', we believe this must be considered in the broader context of supporting the development of age-friendly cities and communities. Australian and international research is providing an evidence base for action in line with the World Health Organisation's [Age Friendly Cities Guide](#) (2007).³²



AAG welcomes the Victorian government's recent [Age-friendly Victoria Declaration](#) and in particular its commitment to 'supporting state and local planning processes to create age-friendly communities and using the knowledge, information and tools available through the World Health Organization's Global Network of Age-friendly Cities.'

SPECIFIC RECOMMENDATIONS FOR VICTORIAN LEGISLATION

18. Secondary dwellings

In recent years, planning law changes in a number of other states have resulted in an increase in the number of secondary dwellings (also known as 'granny flats'), with almost 5,000 approved in New South Wales alone in 2015.³³ These small dwellings provide a supply of affordable housing, that enable older people to downsize in well-located suburbs with existing infrastructure (either by renting a secondary dwelling owned by someone else, or by building a secondary dwelling on a property they own).³⁴

However, Victoria's secondary dwelling laws are the most restrictive in Australia. Property owners typically have to prove the future occupant is a 'dependent' and the secondary dwellings has to be removed if that person dies or moves out. The Andrews Government has pledged to review the Victorian rules around secondary dwellings.³⁵

AAG recommends that [Victorian Planning Provision 32.08](#) should be brought into line with the New South Wales [State Environmental Planning Policy \(Affordable Rental Housing\) 2009](#) (which allows the construction of a secondary dwelling in a general residential zone without a planning permit, provided it is built on a single lot bigger than 450 square metres and is a single storey detached dwelling smaller than 60 square metres).

19. Stamp duty and land tax

The significant cost of stamp duty when purchasing a property can act as a disincentive for older people to downsize. Currently, Victoria has a [stamp duty exemption](#) that applies to pensioners when the value of the land and dwelling is not more than \$330,000 per applicant. A partial concession applies where the value of the land and dwelling is more than \$330,000 but less than \$750,000 (on a sliding scale).

AAG recommends that the Victorian government should review:

- the stamp duty exemption in Division 5 of the [Duties Act 2000](#) to consider whether:
 - it should be extended to older people who are not pensioners and/or
 - the relevant land values should be increased having regard to current median house prices.
- the [Land Tax Act 2005](#) to consider whether stamp duty should be replaced by a broad-based land tax (as the [Henry Tax Review](#) recommended in 2010).



20. Independent living units

Analysis by the Australian Housing and Urban Research Institute found that the importance of independent living units (ILUs) as a social housing option for older people is insufficiently recognised in policy debate about housing options for older low income people.³⁶

In this submission, the 'ILUs' that we refer to are the units (generally built between the 1950s and the 1980s) provided by NFP organisations that are targeted at older people with relatively low incomes and low value assets. Many but not all ILUs are managed under retirement village legislation. Australia-wide it is estimated that there are 34,700 ILUs that constitute approximately 27% of social housing specifically for older persons. As the Australian Government stopped funding ILUs in 1986, much of the current stock is more than 20 years old, below current standards and in need of upgrading. A prevailing view of many relevant NFPs is that continuing to provide ILUs is no longer financially viable.³⁷

AAG recommends that the Victorian government should:

- provide NFP organisations that still have older ILUs with capital funding to upgrade, refurbish, reconfigure or redevelop their dated ILU stock.
- support collaboration between community housing, retirement village and aged care providers.

21. Universal design

In 2011, COAG made the following commitment in the [National Disability Strategy](#):

'The Australian Government is working with representatives from all levels of government, key stakeholders from the disability, ageing and community support sectors and the residential building and property industry on the National Dialogue on Universal Design to ensure that housing is designed and developed to be more accessible and adaptable. An aspirational target that all new homes will be of agreed universal design standards by 2020 has been set.'

We understand that progress has been slow, and only 5% of the 2020 target is likely to be achieved.³⁸ AAG recommends that the Victorian government should take urgent steps to improve progress on this commitment, including appropriate funding and any relevant legislative changes.

22. Land availability and planning approval

International literature highlights the challenge for developers of finding appropriate locations to build retirement housing, noting that the increasing price of land and complexity of planning regulations may push developments to the fringes of suburbs.³⁹ AAG recommends that the Victorian government should review:



AAG

Australian
Association of
Gerontology

RHS SUBMISSION 696

Suite 8, 322 St Kilda Road
St Kilda Victoria 3082
www.aag.asn.au

P +61 3 8506 0525
E enquiries@aag.asn.au

ABN 62 162 569 986

- the [Victorian Planning Provisions](#) (in relation to land zoning, permitted land use, housing density and minimising 'red tape'), and
- the [guidelines about sale of government land](#)

to ensure that developers are able to build sufficient retirement housing in appropriate locations.

23. Affordable housing and preventing homelessness

AAG recommends that the Victorian government should develop and implement a strategy to provide affordable housing and prevent homelessness among older people, including:

- the provision of capital and ongoing funding to substantially increase the supply of age-specific public and community housing
- providing transitional or long-term rent subsidies for older people at risk of homelessness.

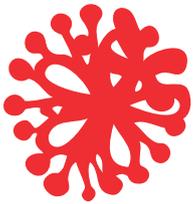
24. Support for people with dementia or other special needs

AAG recommends that the Victorian government should:

- Specifically consider the issue of security of tenure for people with dementia or other special needs who are renting in public housing, community housing or the private rental market.
- Provide funding to enable timely home modifications for financially disadvantaged people with dementia or other special needs (in all forms of housing).
- Provide funding to raise awareness of how to support people with dementia or other special needs in the social housing and homelessness sectors.
- Provide capital and ongoing funding to substantially increase the supply of service-integrated public and community housing for people with dementia or other special needs.

25. Consumer protection

The [Retirement Villages Act 1986](#) was last reviewed in 2004. In 2013, the government introduced amendments to the [Retirement Villages \(Records and Notices\) Regulations 2005](#) and [Retirement Villages \(Contractual Arrangements\) Regulations 2006](#). However, we understand that these regulations may not have addressed the broader issues that were emerging in the retirement housing sector.⁴⁰ AAG recommends that the Victorian government should conduct a comprehensive review of the retirement villages legislation to ensure it contains adequate consumer protections.



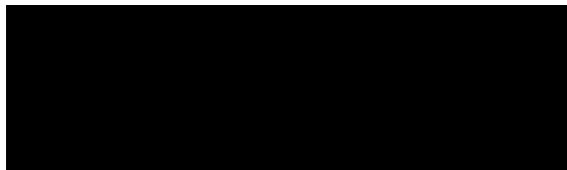
Residential tenancies, residential parks (also known as manufactured homes), caravan parks and rooming houses are regulated under the [Residential Tenancies Act 1997](#). AAG welcomes the consideration of these forms of retirement housing and the issues facing older renters (particularly security of tenure) in the current [Fairer Safer Housing: Review of the Residential Tenancies Act](#).

26. Retirement Housing Ombudsman

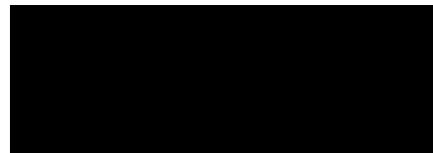
AAG endorses the Consumer Action Law Centre's call for a Retirement Housing Ombudsman to provide a free, fair and quick dispute resolution service.⁴¹

Authorisation

This submission has been authorised by the Chief Executive Officer and the Vice President.



CEO
Australia Association of Gerontology

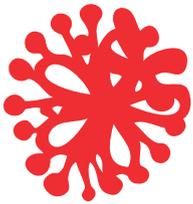


A/Prof Christine Stirling
Vice President
Australia Association of Gerontology

Contact

For further information about this submission, please contact:

Tonye Segbedzi
Senior Policy Officer
tsegbedzi@aag.asn.au
03 8506 0521



AAG

Australian
Association of
Gerontology

RHS SUBMISSION 696

Suite 8, 322 St Kilda Road
St Kilda Victoria 3082
www.aag.asn.au

P +61 3 8506 0525
E enquiries@aag.asn.au

ABN 62 162 569 986

-
- ¹ Australian Bureau of Statistics (ABS), [Where do older people live? Reflecting a Nation: Stories from the 2011 Census](#), Cat. No. 2071.0.
- ² McCrindle (2013) in Kendig H, Crisp D, Gong C, Conway E, and Squires B (2014), [An investigation of the IRT retirement community landscape: a pilot study](#), IRT Group Wollongong NSW at page 9.
- ³ ABS (2013) in Kendig et al, *ibid* at page 11.
- ⁴ ABS, *Where do older people live*, *op. cit.*
- ⁵ Commonwealth of Australia, [2015 Intergenerational Report: Australia in 2055](#) at page 13
- ⁶ Harper, S (2016) Oxford Institute of Population Ageing, *Presentation to the International Federation of Ageing Conference*, Brisbane 22 June 2016.
- ⁷ Dow, B, Sparrow, P, Moore, K, Gaffy, E and Yates, I (2013), [‘What do Older Australians Want?’](#) *Australasian Journal on Ageing*, Vol. 32 No. 4 December 2013 at page 237.
- ⁸ Olsberg and Winters (2005) in Kendig, H et al, *op. cit.* at page 18.
- ⁹ Herd, A (2016) Lincoln Centre for Research on Ageing, *Presentation to the International Federation of Ageing Conference*, Brisbane 21 June 2016.
- ¹⁰ Byles J, Mackenzie L, Redman S, Parkinson L, Leigh I and Curryer C (2014), [‘Supporting housing and neighbourhoods for healthy ageing: Finding form the Housing and Independent Living Study \(HAIL\)’](#), *Australasian Journal on Ageing* Vol 33 Issue 1, pp.29-35, March 2014.
- ¹¹ Crisp D, Windsor T, Anstey J and Butterworth P, [‘What are older adults seeking? Factors encouraging or discouraging retirement village living’](#), *Australasian Journal on Ageing*, Vol. 32 No. 3, September 2013, pp. 163-170.
- ¹² Holland C, Boukouvalas A, Wallis S, Clarkesmith D, Cooke R, Liddell L and Kay A (2016) [Transition from community dwelling to retirement village in older adults: cognitive functioning and psychological health outcomes](#), Aston Research Centre for Healthy Ageing, School of Life & Health Sciences, Aston University, United Kingdom.
- ¹³ Bankwest Curtin Economics Centre, [Keeping a roof over our heads: BCEC housing affordability report 2016](#) at pages 111-113.
- ¹⁴ Petersen & Jones, FaHCSIA 2013, in [Older Persons Housing Fact Sheet](#), Housing for the Aged Action Group.
- ¹⁵ Women’s Health Australia, [Australian Longitudinal Study on Women’s Health: Data book for the seventh survey of the 1946-1951 cohort \(aged 62-67 years\)](#), December 2014.
- ¹⁶ Anglicare Australia, [Who is being left behind? State of the Family Report](#), October 2015.
- ¹⁷ Parsell C, Phillips R and White G (2014) [Preventing first time homelessness amongst older Australians](#), Australian Housing and Urban Research Institute at The University of Queensland AHURI Final Report No. 222
- ¹⁸ Feist, H, University of Adelaide, [Rural Liveable Communities](#), Paper for the NSW Government, Family & Community Services, Ageing Disability and Home Care.
- ¹⁹ Retirement Living Council of Australia, [Demand analysis of housing for older Australians: 2011 Census Review](#) at page 39.
- ²⁰ Feist, H, *op. cit.*
- ²¹ Bernoth, Dietsch & Davies (2012) in Kendig, H et al, *op. cit.* at page 12.
- ²² Property Council of Australia, [The 5 A’s of Retirement Living - towards proactive planning policy](#) at page 4.
- ²³ [City of Port Phillip submission](#) to DHS (2012), *Pathways to a Fair and Sustainable Social Housing System & Options to Improve the Supply of Quality* at page 31.
- ²⁴ Advisory Taskforce on Residential Transition for Ageing Queenslanders *Workshop at the International Federation of Ageing Conference*, Brisbane, 23 June 2016.
- ²⁵ Productivity Commission (2011), [Caring for Older Australians](#) at Volume 2, page 307 and 322.

AAG acknowledges the traditional land owners of Australia and we welcome all Aboriginal and Torres Strait Islander people in our activities. AAG aims to improve equity in access to services and support for ageing Aboriginal and Torres Strait Islander people.



-
- ²⁶ Australian Association of Gerontology, '[AAG Position Statement – Research priorities in housing for older Australians](#)', *Australasian Journal on Ageing* Vol 31 No. 2, June 2012, pp. 130-135.
- ²⁷ Kendig et al, op. cit. at pages 19-20.
- ²⁸ Feldman, S and Radermacher, H (2016), '[Time of Our Lives? Building Opportunity and Capacity for the Economic and Social participation of Older Australian Women](#)', Lord Mayor's Charitable Foundation.
- ²⁹ Aged Care Online, '[Uniting Achieves Rainbow Tick Accreditation for their Aged Care Services](#)', 15 February 2016.
- ³⁰ Gabriel M, Stirling C, Faulkner D and Lloyd B (2014), '[Future housing and support needs of people with dementia](#)', AHURI Positioning Paper No 159.
- ³¹ AAG Position Statement, op. cit. at page 133.
- ³² Kendig et al, op. cit. at page 19.
- ³³ The Alternative Technology Association, '[Build more granny flats to ease rental affordability](#)', 2 June 2016.
- ³⁴ Ibid
- ³⁵ Dow, A, '[Granny flats: a cheap housing solution?](#)', *The Age*, 21 January 2016.
- ³⁶ McNelis, S (2004), '[Independent living units: the forgotten social housing sector](#)', Australian Housing and Urban Research Institute Final Report No. 53.
- ³⁷ Ibid
- ³⁸ Rights & Inclusion Australia and Australian Network for Universal Housing Design (2016) '[Proposal for Standards Development Project To review AS4299-1995 Adaptable housing to align with the 2010-2020 National Disability Strategy](#)'.
- ³⁹ Evans (2008) in Kendig et al, op.cit. at page 12.
- ⁴⁰ Consumer Action Law Centre (2015), '[Retirement Housing Law Reviews: An Australia-wide Perspective](#)'.
- ⁴¹ VCOSS (2016), '[Nanna deserves better: the fight for retirement housing standards](#)', *VCOSS Voice*, 16 June 2016.