STHOT

On the margins? housing risk among caravan park residents

authored by Ed Wensing, Martin Wood and Darren Holloway

for the

Australian Housing and Urban Research Institute

UNSW-UWS Research Centre

June 2003

AHURI Positioning Paper No. 52

ISSN: 1834-9250 ISBN: 1 920758 45 3



ACKNOWLEDGEMENTS

This material was produced with funding from the Commonwealth of Australia and the Australian States and Territories. AHURI Ltd gratefully acknowledges the financial and other support it has received from the Australian, State and Territory governments, without which this work would not have been possible.

DISCLAIMER

AHURI Ltd is an independent, non-political body which has supported this project as part of its programme of research into housing and urban development, which it hopes will be of value to policy-makers, researchers, industry and communities. The opinions in this publication reflect the views of the authors and do not necessarily reflect those of AHURI Ltd, its Board or its funding organisations. No responsibility is accepted by AHURI Ltd or its Board or its funders for the accuracy or omission of any statement, opinion, advice or information in this publication.

AHURI POSITIONING PAPER SERIES

AHURI Positioning Papers is a refereed series presenting the preliminary findings of original research to a diverse readership of policy makers, researchers and practitioners.

TABLE OF CONTENTS

EXEC	CUTIVE SUMMARY	I
1.	INTRODUCTION	1
1.1.	Aims	1
1.2.	Background and literature review	1
1.3.	The definition of permanence?	6
1.4.	Summary	7
2.	CARAVAN PARKS: THE ISSUES	8
2.1.	The rise and fall of caravan parks?	8
2.2.	Locational disadvantage	10
2.3.	Concentration of disadvantage and stigma	11
2.4.	Pressure on alternatives	12
2.5.	Costs of caravan accommodation	13
2.6.	Taxation	14
2.7.	Insecurity of tenure	15
2.8.	Caravans as crisis housing	15
2.9.	Summary	16
3.	CARAVAN PARKS AND THE RISK OF HOMELESSNESS	17
3.1.	Caravans parks and homelessness	17
3.2.	The policy response	18
3.3.	Summary	27
4.	THE RESEARCH PROJECT	28
4.1.	Methods	28
4.2.	4.2 Analysis of existing data sets	28
4.3.	Caravan park audit	29
4.4.	Semi-structured interviews	29
4.5.	Focus groups with caravan park residents	30
4.6.	Timetable	30
REFE	ERENCES	31

LIST OF TABLES

Table 1. Estimates of people living permanently in caravan parks from key research sources.	9
Status of Caravan Park Living 1993 and 2001 – Australian Capital Territory*	19
Status of Caravan Park Living 1993 and 2001 – New South Wales*	20
Status of Caravan Park Living 1993 and 2001 – Northern Territory*	21
Status of Caravan Park Living 1993 and 2001 – Queensland*	22
Status of Caravan Park Living 1993 and 2001 – South Australia*	23
Status of Caravan Park Living 1993 and 2001 – Tasmania*	24
Status of Caravan Park Living 1993 and 2001 – Victoria*	25
Status of Caravan Park Living 1993 and 2001 – Western Australia*	26

EXECUTIVE SUMMARY

This paper is a preliminary review of a study being undertaken by the Australian Housing and Urban Research Institute: University of Western Sydney Research Centre and University of New South Wales, on the nature and prevalence of permanent residency in caravan parks in Australia and the risk of homelessness. This is the first in a number of outputs from the project and provides a comprehensive review of the relevant policy and academic literature, describes the policy issues that are to be addressed in the research project, and details the research methods that will be used to complete the project.

The aims of this study are to:

- 1. develop a typology of caravan parks sorted by geographical location and resident population;
- 2. provide a profile of groups who are vulnerable to homelessness among caravan park dwellers,
- 3. identify the risk factors among groups likely to precipitate housing crisis;
- 4. analyse pathways into caravan parks and the incidence of incipient homelessness;
- 5. explore the potential pathways out of this form of marginal housing and the policy supports needed to effect this;
- 6. assess the benefit of early intervention among caravan residents 'at risk' of homelessness; and
- 7. contribute to the development of current AHURI funded research at the UWS/UNSW AHURI Research Centre on predictors of housing vulnerability and incipient homelessness.

The project addresses a critical policy need in human services. Namely, better intelligence on the location and profile of vulnerable people living in one segment of the marginal housing sector, caravans, and the extent to which they are at risk of homelessness.

The paper reviews the literature and public policy context in which the issues associated with residents living long term in caravan parks is being addressed. The documentation reviewed for this paper covers the past 25 to 30 years and suggests that the problems faced by permanent residents in caravan parks have until recently been largely ignored by various governments and voluntary welfare agencies. While there were a number of small scale caravan park interventions in the 1970s and 1980s, it was not until the 1990s that a wider awareness and appreciation of the problems being faced by long-term caravan park residents became apparent (Geggie and Eddy 2000).

The discussion of permanence *vs.* temporary residence in caravan parks raises the question of how permanence should be defined. Permanent caravan park residents are normally distinguished from tourists as they occupy their premises as their 'principal place of residence'. The term 'permanent' is however, a slight euphemism as there might be a rapid turnover of permanent tenancies in certain parks. Up until the early 1990s people were not permitted to live permanently in a caravan park, with some jurisdictions imposing time limits of no more than six months. However, since the mid 1990's it is now legal in all States and Territories to live permanently in caravan parks. There is also a distinction that can be made between those who make a deliberate lifestyle choice to live in caravan parks and those who find themselves living in caravan parks because they have few, if any, alternatives available to them. Young people, women (especially women with children escaping domestic violence), families, and single men are the main social housing clients in caravan parks.

Although there is increased recognition by governments at all levels of the circumstances of people living permanently in caravan parks and some improvements in some areas of concern, a number of issues continue to pervade long-term caravan park dwellers

The available research on caravan parks indicates a range of issues are leading to increased pressure on the position of lower income and more marginalised households who use this form of accommodation. These pressures include:

- an overall decline in caravan parks and the numbers of caravans available for longer term occupancy (especially in some geographical areas);
- locational disadvantage associated with isolation from the usual range of community services and facilities;
- concentration of disadvantage and stigma associated with living permanently in a caravan park;
- declining affordability of home ownership and declining investment in the private rental sector;
- the long term effects of asset loss associated with renting an on-site caravan,
- the impact of the introduction of the goods and services tax;
- insecurity of tenure; and
- the use of caravans as crisis accommodation by some housing or supported accommodation providers.

Cumulatively, these pressures are leading to an increased risk of homelessness among this vulnerable group. There are a number of factors that indicate a proportion of caravan park residents are in a marginal housing position through lack of affordable or accessible alternatives. However, while caravan parks have become, for some, an accommodation of "last resort", the impact of the emerging pressures on this population points to a higher risk of homelessness among permanent caravan park residents at the present time. At the same time pressures on the park sector itself appear to be reducing the availability of caravans for this group of households

The results of a survey undertaken by the Family Action Centre at the University of Newcastle in 1993 and 2001 regarding the status of caravan park living in each State and Territory are included in tabular form in the final part of this paper. The responses to the survey show that the issues confronting permanent residents in caravan parks are much the same today as they were more than a decade ago. They include:

- lack of security of tenure;
- inadequate housing standards;
- high prevalence of homelessness;
- minimal access to community, health and education services;
- lack of knowledge about and lack of support in asserting tenancy rights; and
- a range of social justice issues (DFaCS 2000b).

This research project aims, in part, to make some assessment of the impact of these issues and the likely incidence or increased risk of homelessness among the permanent residents of this sector. The final part of this paper sets out the research methodology for this project. The research will involve a mixture of qualitative and quantitative techniques in order to develop an in-depth picture of risk factors and groups as well as location of people vulnerable to homelessness in the caravan housing market.

1. INTRODUCTION

This paper reports preliminary review work by the Australian Housing and Urban Research Institute: University of Western Sydney Research Centre and University of New South Wales, on the nature and prevalence of permanent residency in caravan parks in Australia and the risk of homelessness. This is the first in a number of outputs from the project. It provides a comprehensive review of the relevant policy and academic literature, describes the policy issues that are to be addressed in the research project, and details the research methods that will be adopted in the subsequent stages of the project.

This study aims to contribute to the examination of the housing experiences of marginalised groups. It stands alongside and links with other UWS/UNSW AHURI projects that have examined the experience of recurring homelessness and the housing trajectories or pathways of those who have a history of inadequate housing (Robinson 2003). The study also builds upon other recent caravan park research. This includes work undertaken by Queensland University of Technology and Queensland Department of Housing examining the impact of caravan park closures on residents, housing and support services in South East Queensland and the work of the University of Newcastle's National Dissemination Program of the Hunter Caravan Project and their ongoing action research program.

Further outputs from this project will include a work in progress report, a final report and a findings paper.

1.1. Aims

The project will aim to:

- 1. develop a typology of caravan parks sorted by geographical location and resident population;
- 2. provide a profile of groups who are vulnerable to homelessness among caravan park dwellers,
- 3. identify the risk factors among groups likely to precipitate housing crisis;
- 4. analyse pathways into caravan parks and the incidence of incipient homelessness;
- 5. explore the potential pathways out of this form of marginal housing and the policy supports needed to effect this;
- 6. assess the benefit of early intervention among caravan residents 'at risk' of homelessness; and
- 7. contribute to the development of current AHURI funded research at the UWS/UNSW AHURI Research Centre on predictors of housing vulnerability and incipient homelessness.

The project addresses a critical policy need in human services: namely, better intelligence on the location and profile of vulnerable people living in one segment of the marginal housing sector, caravans, and the extent to which they are at risk of homelessness. This directly addresses policies aimed at early intervention of homelessness and means that identification of housing risk factors is likely to raise cross-policy/cross-portfolio issues and dilemmas which has implications for a range of government services provided by SAAP Agencies, State Housing Authorities and Family and Community Services.

This positioning paper examines existing material so as to identify emergent issues and highlight current gaps in knowledge.

1.2. Background and literature review

The documentation reviewed for this paper suggests that the problems faced by permanent residents in caravan parks have until recently been largely ignored by various state and voluntary welfare agencies. While there were a number of small scale caravan park interventions in the 1970s and 1980s, it was not until the 1990s that there appears to have been a growing awareness about the problems faced by long-term caravan park residents (Geggie and Eddy 2000).

The 1975 Priorities Review Staff '*Report on Housing*' (1975:335) for the then Prime Minister, the Hon Gough Whitlam, devotes a chapter to examining what happened in the United States of America during the late 1950s and 1960s when mobile housing first became very popular. The chapter examines the relativities in the development of mobile home parks between Australia and the USA and reported that in 1972 the then Federal Department of Housing had called a meeting of representatives of State Local Government Departments and planning authorities to discuss the need for a model mobile home parks code. A committee was subsequently formed and a code was completed in 1973. The Report discusses the potential benefits of mobile housing in meeting critical housing shortages and suggests that they can contribute to real cost savings in the supply of housing when compared to conventional low density housing. However, the Report makes no mention of the very real problems faced by people already living long term in caravan or mobile housing parks in Australia.

Jones' (1972) seminal work on housing and poverty also makes no reference to caravan dwellings, suggesting that the incidence of people living permanently or long term in caravan parks had not registered at that time as a housing policy issue.

The existence of long term residents in caravan parks was recognised at a State level in the 1975 Victorian Minister for Tourism's *Caravan and Camping Inquiry* which concluded:

"The Committee is of the opinion that long term caravanning is a fact of life and is growing rapidly as the housing shortage intensifies and the mobility of the workforce expands" (p. 44).

This Victorian inquiry stimulated further research and in 1978 the Centre for Urban Research and Action (CURA) in Melbourne argued that permanent residents in caravan parks should be considered a 'marginal' form of housing, in terms of costs, standards, access to community facilities and legal rights, when compared to conventional housing options (CURA 1978). Residents were identified as being in one of three major groups: the 'savers', the 'trapped' and the 'independents'. The 'savers' were newly formed families who were saving for their first home. This group stayed in parks for an average of 14 months and commonly cited their disillusionment with paying rent as a reason for entering caravan parks. The 'trapped' had lived in more than one park and had occupied vans for longer periods (average of 25 months). Typically they were more frequent movers than the savers and had children of school age. The report speculates that the loss of a 'wife's income' due to childcare responsibilities reduces a household's ability to save. While a higher proportion expected to move, few thought they would enter their own accommodation. Of those intending to move into public housing, two-thirds were in this group. The trapped were described as living in bigger vans and paying higher costs. The *independents'* were older and mostly childless couples. They were more likely to own their own caravan, which had often been used formerly as holiday accommodation. They were attracted to caravan park dwelling through a desire for mobility, relatively lower costs and reduced levels of maintenance.

Several further reports followed the work by CURA. A joint committee of the Victorian Legislative Council and Legislative Assembly upon Parks for Mobile Homes and Caravans (the Maher Committee) was established in the late 1970s. Their initial report in 1979 was concerned with the physical conditions of caravan parks and recommendations were made on the classification, licensing and standards regulating different classes of parks. The Report supported the findings from a Joint Parliamentary Enquiry into Parks for Mobile Homes and Caravans that recommended the gradual elimination of permanent residency on the grounds of public health and safety and because it represented "a serious departure from long-accepted community standards" (cited in Mueller and Collie 1980:23). Upgrading the facilities in parks was not thought to be viable as the report suggested that costs would be passed on to residents through an increase in rental charges (Kenny and Cox 1982).

In 1979 the Australian Council of Social Services (ACOSS) reported that children in caravan parks were more likely to 'be at risk' and therefore enter care (cited in Kenny and Cox 1982:39) and the following year Mueller and Collie were commissioned to do a study for the Women's Trade Union Commission. This was concerned with the social implications of the use of caravans as housing. Based on limited fieldwork they maintained that a series of social

problems resulted from the location, structure and environment of caravan parks. This included problems associated with privacy, overcrowding, inadequate heating and high maintenance costs. Among other things they recommended the development of tenancy rights and rent controls, design standards and planning regulations for caravan parks and the systematic delivery of services into caravan parks used by permanent residents (Mueller and Collie 1980).

A subsequent report by Kenny and Cox (1982) continued the focus on families and their children. They collected basic empirical data concerning the nature and extent of caravan living and therefore to increase community awareness of the needs of families in particular. Seven rural areas in NSW were surveyed although data is described as lacking in all but three of the parks and there appears to be a lack of consistency in the data collected in each area. Permanent residents made up between 85% and 90% of the population with families comprising between 33% and 66% of households on the various parks. A majority of residents on all three parks indicated that caravans were their preferred form of accommodation and it was suggested that most chose this option for employment reasons, such as the ease of mobility, or because other forms of accommodation were too expensive or unavailable. In two of the parks it was reported that a majority had been there less than five years but saw themselves continuing to live there for a further five years. In these parks it was reported that most either owned their vans or were paying for them through hire purchase schemes. In the other park 70% had been in the park for less than a year and 96% for less than five years and it was noted that 27% were there because other accommodation was too expensive and 18% were waiting for public housing.

The study concluded that park accommodation fell short of acceptable community standards and this had a significant bearing upon the health and well-being of residents and particularly children. The authors indicated that action was required as a result of the growth of permanent residency and the shift in function away from tourist parks. Recommendations derived from this study included the development of minimum standards, tenancy rights and rent controls for permanent residents. Minimum standards were recommended for:

- quality playgrounds;
- planned outdoor recreational space;
- indoor community space;
- separate child bathrooms;
- on park telephones;
- increased site areas; and
- visitor car parks.

Local councils were encouraged to ensure that residents would have access to services before approving new parks. Ultimately, however, the only adequate solution to the problems experienced by park dwellers was described as the development of a federal housing policy that ensured the provision of a range of housing accessible to people at all income levels. In the meantime, it was suggested that incentives or assistance should be provided to caravan park proprietors which would enable them to carry out the required upgrading of their parks, local government provision of play areas and a state levy on major developments to ensure an adequate urban infrastructure.

The understanding of the problems faced by park dwellers was further developed in a study by the Victorian Committee of Review on Long-Term Residency in Caravan Parks (1983) which found that long term caravan dwellers experience two major problems. Firstly, caravan park dwellers suffered discrimination in three major areas:

- "belittling" or a sense of second-rate citizenship conveyed from other people in the community;
- commercial and institutionalised disadvantages through policies of government departments and statutory organisations (for example, post offices not forwarding mail); and
- concentrations of vulnerable groups.

These problems were exacerbated by the relative isolation of the parks thereby limiting access to community services.

Secondly, the legal status of long-term residents in caravan parks was marked by considerable differences across local government boundaries on the basic legality of people living in parks, and a de facto, but unspecified permission for park residents to remain.

The *Study into Homelessness and Inadequate Housing* (Coopers & Lybrand WD Scott 1985) noted the increasing incidence of long term living in caravan parks and confirmed the findings of previous studies that permanent caravan dwellers face several problems, including social and geographic isolation, insecurity of tenure, high density living and associated problems of noise and extreme lack of privacy coupled with the probable concentration of vulnerable groups, and discrimination.

The increasing incidence of long term occupancy in caravan parks was discussed at a Local Government Ministers' conference in 1985 and a Joint Local Government, Planning and Housing Officials Working Group (JLGPHOWG) comprising State and Government officials for local government, planning and housing departments was formed to compare experiences and review the emerging situation. The Working Group's preliminary report (JLGPHOWG 1986) noted that all but the most recent regulations had been developed with an environment of prohibition on long term living in caravan parks:

"Rather than allowing long stay and enforcing requirements applied to conventional housing, authorities have traditionally prohibited but not enforced (sic) long-term living in caravan parks" (JLGPHOWG 1986:2).

This, in the view of the participants, had resulted in tolerance for poor standards as they were considered sufficient as tourist accommodation. The report demonstrates, however, that the exclusionary approach had not prevented or curtailed the levels of permanent occupancy. Rather numbers were shown to be growing and the units were getting larger. Various planning and housing controls were shown to be absent and the group recognised that future policy should aim to ensure "equity, efficiency, flexibility and affordability in government regulations to protect the safety, health and amenity of all individuals in the community" (JLGPHOWG 1986:2).

While the Working Group shared the earlier view that improved standards might result in higher costs and therefore would displace those who were there because they were unable to afford other forms of accommodation, it also maintained that significant improvements could be made through a number of measures. These included changes to:

- tenure arrangements;
- planning and zoning regulations;
- siting and the provision of facilities; and
- construction standards.

By the early 1990's the issue of long term caravan dwellers was beginning to receive more national attention. Indeed, the National Housing Strategy forecast that unless there were significant improvements in the national economy and improvements in the availability and affordability of housing during the remainder of the 1990's, there would be a higher proportion of households forced to share dwellings against their preference or be obliged to live in inappropriate accommodation such as caravans (NHS 1991b p83).

Despite numerous reviews of housing policy in the period 1985 to 1992¹, the Federal Government instructed the Industry Commission to undertake an inquiry into the provision of public housing and in particular to inquire into how Commonwealth, State and Territory Governments could achieve their housing objectives more efficiently and effectively. In the course of conducting its inquiry, the Industry Commission received several submissions drawing attention to the plight of long term dwellers in caravan parks. The Industry Commission (1993:77) reported that caravan parks and mobile homes were two forms of nontraditional dwellings that were on the increase in recent years. The Commission noted that a growing group of low-income people rent on-site vans for long periods of time because the upfront costs of private rental were too high and several submissions criticised caravans and mobile homes as inappropriate forms of housing due to the lack of security of tenure and disregard for tenancy rights. The Industry Commission found in many States that the general residential tenancy legislation did not apply to caravans and mobile homes, although many States that had not already done so, were considering enacting specific legislation for caravan parks and mobile homes to improve the security of tenure and tenancy rights of long term occupants of caravan parks.

An Australian Housing Research Council (AHRC) study in 1993/94 estimated that more than 122,000 persons were living permanently in caravan parks, and that more than a quarter of these were in north-east NSW and south-east Queensland. The purpose of the AHRC study was to obtain information on caravan park residents housing needs and preferences to facilitate effective future policy responses and suggest appropriate policy directions. The final report of the study made several recommendations for policy changes, including improving the physical quality of the park environment, access to off-park services, the quality, equity and consistency of management practices in parks, and improving the security of tenure enjoyed by park residents (Purdon 1994).

In the mid-1980s the University of Newcastle established the National Dissemination Program (NDP) of the Hunter Caravan Project within its Family Action Centre to raise awareness, nationally, of the issues for caravan park residents. In 1994 the NDP and the Ian Buchan Fell Research Centre of the University of Sydney jointly organised a seminar on 'Manufactured Home Estates in Australia' to raise public awareness about this new form of affordable housing. Berry (1994:68) summed up the outcomes of the seminar by pointing to the tension between affordability and the standards relating to amenity. The better the amenity, the more likely it is that this will be reflected in the cost of the product. Aspects such as privacy, security of tenure, compliance with codes of behaviour, and other social factors need to be improved if this form of housing is to become more widely accepted.

At about the same time, the Urban Research Program at the Australian National University published a paper by Martin Mowbray that sets the development of relocatable dwellings as permanent accommodation within the context of declining housing accessibility, substantial demand and a dry economic environment. Mowbray (1994a:23) expressed concern about the increased reliance on relocatable dwellings as part of the housing stock for low income groups and retirees as it may contribute in the longer term to polarising Australia into housing rich and housing poor.

These concerns were echoed in a report prepared by ONSITE, a south-east Queensland community organisation, and Brisbane City Council in 1998. This report found that caravan parks were becoming important providers of 'low cost' permanent and semi-permanent housing (Rogan 1998). The report noted that while significant gains had been made in other Australian States in relation to legislative reform, planning practice and promotion of caravan park issues, little had occurred in Queensland in recent years, despite the fact that Queensland has the largest caravan park population in Australia and Brisbane had the highest density of caravan park dwellers in any particular region. The report identifies the same issues plaguing long-term caravan park dwellers that have been identified previously, such as lack of security of tenure, poor park management practices, and lack of access to support services.

¹ Coopers and Lybrand WD Scott 1985, Kendig and Paris 1987, National Housing Policy Review 1989, National Housing Strategy 1991-92.

More recently, in its Final Report to the Bernard van Leer Foundation on the first eight years of the National Dissemination Program of the Hunter Caravan Project (Geggie and Eddy 2000), the Hunter Caravan Project claims to have made significant in-roads into a number of areas of concern to long-term caravan park residents, including:

- legislation relating to overall tenancy protection has been improved. It is now legal to live in caravan parks in all States, whereas before 1986 it was illegal;
- since 1986 caravan park residents have been included in the Census of Population and Housing;
- housing and park design for mobile home parks that are targeted more for the elderly have been improved and local and state governments have shown interest and commitment to planning for families;
- local area health and community organisations now have greater awareness of the existence of parks that are used for long-term housing;
- prior to 1986 State and Federal Governments had only a planning and regulatory function relating to caravan parks. Federal and State Governments are now more willing to recognise they have other responsibilities and have funded initiatives in areas of education, health, children and family services, and in housing;
- limited finance is available at normal home loan rates whereas this was not the case previously; and
- the National Dissemination Program has worked to reduce the stigma often attached to living in caravan parks.

The report also concludes that 'living on the margins' is still a relevant term for people living in caravan parks. Despite improved tenancy legislation and limited government programs to educate residents about their rights and responsibilities, "park residents are still constrained by the power differentials – lack of security of tenure and the custodial approach of many park operators. Parks still cater for the poor, the dispossessed, and for families that lack essential resources to survive" (Geggie and Eddy 2000:23).

Research on inland caravan parks in NSW by the NSW Parks and Village Service (PAVS 2000) confirms that itinerant workers, young people, people with disabilities and Indigenous people are vulnerable to discriminatory practices by park operators.

Finally, a study conducted by Queensland Shelter and the Queensland Institute of Technology (Greenhalgh *et al* 2001) found that the number of caravan parks in SE Queensland had fallen in the period 1997-2000 and that the number of long term residents had also fallen significantly. The factors influencing these trends include profitability, trends toward favouring more profitable (but more risky) short term tourist lettings, pressures for residential or commercial redevelopment due to the location of the park on land suitable for development or proximity to other services, and the changing legislative environment, especially local planning and building controls. However, the report concluded that caravan parks still play an important role in providing housing for low income and vulnerable households and that the decreasing supply of caravan park accommodation is impacting on the overall shortage of housing choices for low income households (Greenhalgh *et al* 2001:70)

1.3. The definition of permanence?

The discussion of permanence *vs.* temporary residence on caravan parks raises the question of how permanence should be defined. Permanent caravan park residents are normally distinguished from tourists as they occupy their premises as their 'principal place of residence'. The term 'permanent' is however, a slight euphemism as there might be a rapid turnover of permanent tenancies in certain parks. Up until the early 1990s people were not permitted to live permanently in a caravan park, with some jurisdictions imposing time limits of no more than six months. However, since the mid 1990's it is now legal in all States and Territories to live permanently in caravan parks.

Nevertheless, it is common to distinguish between two types of permanent caravan park dwellers. On the one hand are those who would describe their decision to live in parks as a lifestyle choice, although of course this choice might well have been constrained by a household's financial options. This population mainly comprises older people with a high proportion in retirement that have chosen to sell their home and move into a caravan or a manufactured home on a residential park. Anecdotally, many of these retirees are influenced by their positive experience on holidays or while travelling. These households are often attracted to the natural settings in which the parks are located particularly coastal sites (Greenhalgh *et al*, 2001 and Bostock 2001). Caravan parks are also a common choice for people who have to travel with work and do not wish to tie themselves to any one residency. This group broadly corresponds to the 'independents' category defined by CURA (1978) noted above.

On the other hand there are those who find themselves living in caravan parks because there are few alternatives available to them – the 'trapped' in CURA's typology. This includes people on low incomes and others who for one reason or another have not been able to access other forms of accommodation either in the private or public sector. Certain sources suggest that young people, women (especially women with children escaping domestic violence), families, and single men are the main social housing clients in caravan parks (Whittish 1999). For these people, caravan parks are often a last resort. It is this group with whom this research is primarily focused.

1.4. Summary

This overview of the literature shows that although there is increased recognition by governments at all levels of the circumstances of people living permanently or long term in caravan parks and some improvements in some areas of concern, a number of issues continue to pervade long-term caravan park dwellers. These are discussed in the next chapter.

2. CARAVAN PARKS: THE ISSUES

Taken together, the available research on caravan parks indicates a range of key issues that are leading to increased pressure on the position of lower income and more marginalised households who use this form of accommodation. Cumulatively, these pressures can be argued to be leading to an increased risk of homelessness among this vulnerable group. However, while caravan parks have become, for some, an accommodation of "last resort", the impact of the emerging pressures on this population remains uncertain. This research project aims, in part, to make some assessment of the impact of these issues and the likely incidence or increased risk of homelessness among the permanent residents of this sector.

The following section reviews in more detail a number of issues that have been identified in the literature as increasing the pressure on marginally housed households in caravan parks at the present time.

2.1. The rise and fall of caravan parks?

Over the last 20 years there have been several attempts to estimate the number of caravan parks, the capacity of caravan parks, the tenure of households residing in caravans, and the socio-economic circumstances of individuals living in caravan parks.

Most of this information has relied on two sources - the Australian Bureau of Statistics (ABS) Census data and the ABS Survey of Tourist Accommodation (STA).

However, the specific definitions used by different data sources and definitional changes over time have made the job of researching the trends in long term living in caravan parks and better understanding the nature of the caravan park sector increasingly difficult. Combined with the limited amount of published information about support services used by individuals who reside in caravan parks, detailed information about this sector in Australia has been limited.

To try and obtain a better understanding of the number of persons living in caravans and the characteristics of persons residing in the caravan park sector, three data sets will be examined:

- the ABS quinquennial Census of Population and Housing;
- the ABS Survey of Tourist Accommodation (STA); and
- the ABS 1996 Census of Population and Housing Confidentialised Unit Record File (CURF).

A fuller analysis of these statistics will be included in the final report on the project.

Table 1 shows a summary of the various estimates that have been made over the last twentyfive years of persons living permanently in caravan parks. A discussion of the various estimates and the research on statistics follows Table 1. Table 1.Estimates of people living permanently in caravan parks from key researchsources.

Year	Source or Reference	Estimate of persons living permanently in caravan parks
1978	B W Boer	270,000
1981	ABS Census of Population & Housing	84,483
1985	Coopers & Lybrand WD Scott for the <i>Study</i> into Homelessness and Inadequate housing	200-300,000
1986	JLGPHOWG for the Local Government, Planning and Housing Ministers	130,000
1987	Kendig & Paris for the International Year of Shelter for the Homeless National Committee of Non-government Organisations	100,000
1989	National Housing Policy Review	77,094

Early estimates in the late 1970s put the number of people living permanently in caravan parks at approximately 270,000 persons. This estimate was based on there being more than 2000 caravan parks with an average of over 100 sites each with an occupancy rate of 2.7 persons per caravan. Operators have indicated they generally need to maintain an occupancy rate of about 50 per cent to run a profitable business, so 0.5 was used as a permanency rate for the estimate (Boer 1978).

In the 1981 Census of Population and Housing, 84,483 persons stated that the caravan park was their usual place of residence. Over the subsequent five years it was estimated that this figure grew to 130,000 (JLGPHOWG 1986). The final report of the *Study into Homelessness and Inadequate Housing* (Coopers & Lybrand WD Scott 1985:72) believes that this could be an understatement of the true figures because people may not have been willing to state that a caravan park was their usual place of residence. It was suggested that the actual number was probably between 200,000 and 300,000 nationally, with growth rates approaching 11% per annum (JLGPHOWG 1986). At the time it was thought that this trend would continue because of housing affordability problems.

An analysis of the 1986 Census by the *National Housing Policy Review* (1989) showed that there were 77,094 households living in caravan parks. While this figure includes those preferring to live in caravans for mobility and convenience and a number would have been on holiday at Census time, the level of occupancy of caravans was thought to reflect the limited choices available to very poor households. In their report for the International Year of Shelter for the Homeless National Committee of Non-government Organisations, Kendig and Paris (1987) estimated that as many as 100,000 people were living permanently in caravan parks. Kendig and Paris (1987:35) describe most non-private dwellings, which includes caravan parks, as 'a reserve or backwater which picks up people excluded from the social and economic mainstream'.

Several reports have noted the tendency for caravan park dwellers not to admit that they live in a caravan park or to identify their accommodation as a house when filling out the Census form because of the stigma attached to living permanently in a caravan. Census figures may therefore under-enumerate the true extent of caravan dwellers (Kendig and Paris 1987, Purdon 1994, Mowbray 1994a). A further problem with census data, raised by Connor and

Ferns (2002), is that park managers are used as census collectors. They also raise the issue of unclear definitions on manufactured homes. Mowbray (1994a) also maintains that given the illegality (up to the early 1990's) of much long term living in caravan parks, the official statistics are still likely to understate the real situation.

Mowbray and Stubbs (1996) suggest, on the basis of National Housing Strategy data, that long-term residency in caravan parks increased significantly during the 1980s, but ABS sources have subsequently indicated a decline in the sector. The scale of caravan occupation is not, however, clearly enumerated in the ABS census due to classification difficulties. The Census provides information on households in 'non-private dwellings', which are defined as 'accommodation not in conventional houses or flats'.

Official data on caravan park residents remains problematic. Until 1997 the ABS collected data on caravan parks on a quarterly basis through their Tourist Accommodation data set (Catalogue No. 8635). However, since 1997 the caravan park data has excluded parks with less than 40 sites and data is now only collected triennially. The ABS has made adjustments to disaggregate the smaller (less than 40 sites) parks in order to facilitate longitudinal analysis but regular changes in the definition of short-term and long-term parks makes analysis on this basis impossible (Greenhalgh et al, 2001).

Whatever the precise number of park residents, it seems clear that the number of caravan parks open to permanent residents is declining. This decline appears most pronounced in coastal areas where many parks are re-orientating toward more up-market cabin style accommodation. Between 1997 and 2000, the number of long-term parks decreased by almost 12 per cent (Australian Bureau of Statistics 2000). One report suggests that some park owners have tried to evict older, permanent residents to make way for more profitable cabin accommodation aimed at holiday makers (Lovejoy and Secomb 2001). This is compounded by lack of planning controls that permit the development of cabin accommodation without separate planning approval (*Sydney Morning Herald* 31 January 2001:9).

No data, however, are readily available to assess the potential impact of those marginally housed in caravans becoming homeless. Current categorisation of homelessness used by the Australian Bureau of Statistics (ABS) fails to count two key groups: those living in caravan parks due to having no other form of accommodation, and those who are at risk of homelessness (Victorian Homelessness Strategy 2000). While the National Data Collection Agency (NDCA) of the Australian Institute of Health and Welfare (AIHW) collect data on people both entering and exiting SAAP from caravan parks, but this is not routinely available.

2.2. Locational disadvantage

There are also marked regional differences between coastal, inland and metropolitan parks.

In coastal areas caravan parks have often been located with little relationship to the day-to-day needs of longer term residents, but rather according to the attraction of the beach or other natural feature, or perhaps in industrial areas or on flood prone land. It has been argued that tourists and other transients do not require good access to facilities but rather seek proximity to tourist attractions and that in such locations caravan parks would not affect the amenity of conventional residential neighbourhoods (JLGPHOWG 1986:18). Given that most of these parks were developed in the period when permanent residency was banned, it was probably an appropriate approach. However, as we have seen, this is no longer the case.

Coastal parks have now become a lifestyle choice for many low-income residents, particularly older people who have chosen to buy manufactured homes on their retirement. Changes in caravan park supply, however, together with increased site rental costs, means that many older and lower income people are increasingly forced to rely on relatives for housing support (Connor 2001a; South Australian Department of Human Services 2000). This means that this group may also be increasingly vulnerable to homelessness.

Inland and metropolitan parks tend not to house lower-income retirees but rather people with no-where else to go. A lack of low cost housing, the high cost of private rental, a lack of rental references and/or poor rental history all contribute to the caravan park as the only option for many poorer people (Galloway 2001). Rural towns, for example, often have caravan parks, mainly located on highways. Anecdotal evidence suggests there is often one park that is used by welfare agencies to refer clients in 'crisis' (Parks and Village Service 2000). This is generally because there are no alternative forms of emergency accommodation in rural and regional areas (Connor 2001b).

Similar caravan populations may be found in metropolitan areas, particularly those located on the urban-rural fringe or situated within already disadvantaged suburbs. These populations may be segmented again depending on the size and preferences of the park owner. Some smaller parks (20-30 sites) may only cater for one group, single men for example, while other larger parks (200-250) will take all comers.

There are other locational issues associated with urban fringe caravan parks. Material produced by the National Dissemination Program of the Hunter Caravan Project (NDP) points to a range of factors that are associated with increased housing risk (Geggie and Eddy 2000). This form of locational isolation means that residents often lack health-promoting resources, such as primary health care, good access to public transport, schools, shops, jobs and accessible social networks. However, these issues are increasingly being recognised by governments, more so than was the case in previous decades. For example, the Federal Government recently announced a \$740,000 child care project aimed at caravan park families identified at risk of crisis (Anthony 2001). The project will support families in selected caravan parks across New South Wales, Queensland, South Australia and the Northern Territory.

2.3. Concentration of disadvantage and stigma

Earlier studies have noted the increasing concentration of disadvantaged people in caravan parks often living in poor quality accommodation (Victorian Committee on Long Term Residency in Caravan Parks in Victoria 1983, JLGPHOG 1986, Purdon 1994). Caravan parks are increasingly housing a mix of materially and socially disadvantaged individuals and families including:

- families on low income;
- ex-care leavers and other vulnerable young people;
- people with disabilities who once lived in institutions;
- people exiting prison;
- women and children escaping domestic violence;
- itinerant workers or unemployed people looking for work, especially young men;
- people suffering from mental illness; and
- people with substance abuse (PAVS 2000)..

Anecdotal evidence collated in the early stages of research for this project and recent research by the NDP (Geggie and Eddy 2000), indicate that SAAP services experiencing a high demand for emergency accommodation are referring clients in need of immediate crisis accommodation to the local caravan park.

While most people living permanently in caravan parks tend to own their caravan or mobile home and rent their site, these more vulnerable people rent their accommodation. Both these groups may be in tenuous situations and vulnerable to homelessness. Permanent sites in caravan parks appear to be declining and the closure of parks might also result in the loss of caravans and mobile homes because there are no alternative sites available or because of the costs and difficulties associated with relocation (FAC 2001; Wood M 2002).

The fact that caravan park accommodation is different from and in some ways inferior to, conventional housing has led to a 'stigma' being attached to people living in caravan parks. The report of the JLGPHOWG (1986:21) found that this 'stigma' leads to discrimination by the community, which is particularly difficult to overcome, and reinforces the physical and social isolation of many park residents from other residential areas and communities. The report also found that it is a challenge for governments to redress the 'institutional discrimination' against

caravan park residents. For example, many local Councils ignored the permanence of caravan park populations in their service planning, many lending libraries refused to enrol caravan park residents on the basis that they are 'transient', and postal services were often infrequent. The study will ascertain whether some of these institutional barriers have been removed or whether they continue to cause problems.

2.4. Pressure on alternatives

Much of the early research on caravan parks noted the role parks were increasingly playing as the location for many with little choice elsewhere in the housing market. For example, the JLGPHOWG report (1986:26) concluded that long-stay living in caravan parks had emerged for several reasons, including declining affordability of home ownership, poor affordability and declining investment in the private rental sector, the inability of public housing to meet demand, and the slow response in the supply of conventional housing to changes in demand. Similarly, reporting on trends in the 1980s, the Industry Commission's (1993b) inquiry into public housing claimed that the growth in permanent caravan park dwelling was largely explained by the shortage of affordable traditional housing. This report cited the work of the Western Sydney Housing Information and Resource Network, which demonstrated how the numbers renting on-site vans for long periods had grown as a consequence of high upfront costs such as bonds and rent in advance. The Industry Commission report also cited a contribution from the National Youth Coalition for Housing which claimed that the cost of caravan living may often be only marginally less and are sometimes more than living in other forms of private rental.

"Residents of caravan parks have little security of tenure and few tenancy rights, and conditions are often far from adequate. Discrimination and other negative aspects of private rental can be more pronounced." (Industry Commission 1993b).

However, the evidence does not all point in that direction. In some contrast, a survey of a small number of caravan parks carried out for the Australian Housing Research Council (AHRC) (Purdon 1994) seven years after the JLGPHOWG report, found that most park residents were living in caravan parks through choice and that they had not been 'forced out' of non-park accommodation and into park living through a lack of alternatives. The survey also revealed that most caravan park residents were primarily concerned about the quality of the physical environment of their park than they were about tenure and management practices. The survey results did not indicate that many caravan park residents found themselves to be marginalised or significantly disadvantaged. The researchers concluded however, that the social demographic characteristics suggest that caravan park residents could have lower housing expectations than the community as a whole (Purdon 1994).

Despite the AHRC report, it has been generally argued that there is a link between reducing opportunities in the rest of the housing market and the increased demand for long term residency in caravan parks. Choice of affordable housing alternatives in the private sector has been declining in recent years. This has been coupled with a deterioration in the affordability of the rental sector, with increasing numbers of households in housing stress. Public housing waiting lists have been growing as a consequence in most states, but his has been accompanied by falling lettings rates.

Reduced opportunities in the public rental market

ACOSS (2002) reports that public housing waiting lists stood at 221,313 in 2001, having fallen form a peak of 236,237 applicants in 1996. ACOSS believes this decline can be explained by increased targeting as part of the requirements for Commonwealth funding in the 1996 Commonwealth State Housing Agreement (CSHA). In response to these requirements, State housing authorities tightened the eligibility criteria for public housing assistance and many applicants were no longer eligible and therefore left the waiting lists. Furthermore, all States except Tasmania housed less applicants in 2000-01 compared to 1993-94. Nationally, the number of new lettings in public housing has dropped from a high of 55,094 in 1993-94 to 38,736 in 2000-01. Funding cuts and the redevelopment of public housing estates have contributed to these trends.

In addition, those getting into public housing are now among the most disadvantaged. Over the past twenty years public housing has become increasingly rationed to the most seriously disadvantaged. Almost all new tenants are now on some form of Centrelink payment or benefit (Darcy and Randolph 2000).

Reduced opportunities in the private rental market

Research by Yates and Wulff (2000) shows that low income private rental housing is in decline and that it is providing a decreasing range of options for low income households. (Yates and Wulff 2000). Wood (2002) has also shown that the financial and fiscal support for investors in the private rental market is skewed away from lower value rental property, leading to a lack of incentives to provide lower rental accommodation. Taken together, this research strongly indicates that housing alternatives for lower income and vulnerable households are being squeezed. Declining opportunities for caravan park accommodation must therefore be set in the context of a deteriorating housing supply situation across the lower end of the private rental market.

Additionally, the private rental market in many locations around Australia is under considerable stress with increasing rents and declining affordability . (NSW Ministerial Task Force on Affordable Housing 1998; Berry and Hall 2001; Randolph and Holloway 2002). These pressures are leading to an emergence of highly-localised pockets of disadvantage in some areas (Gleeson and Randolph 2002). It has been argued that one response to this has been in the increased demand for other forms of marginal accommodation such as caravans and relocatable homes (Gleeson 1997).

2.5. Costs of caravan accommodation

The issue of the relative costs of renting a caravan *vs.* renting a conventional house or flat has been subject to some analysis, although the results have been mixed. The JLGPHOWG (1986) commissioned a study of the relative costs of renting and buying dwellings in caravan parks and the conventional housing market. The study examined the relative annual costs for 1986 and the longer-term economics over 25 years. The information for the study was obtained from a sample of eight metropolitan and regional caravan parks of varying standards in NSW, Vic and Qld, and the information for conventional housing related to the area where the caravan park was located. The study found that the annual costs of both renting and buying a unit in caravan parks is often much cheaper than renting and buying in the conventional housing market (DOLGAS 1987).

However, a more detailed longitudinal study, carried out by the Department of Local Government and Administrative Services to determine the long-term financial implications of various housing options (DOLGAS 1987) concluded that:

- The asset position of households able to purchase traditional housing is far in advance of households which have chosen any other form of housing.
- There is little difference in the long-term asset position of households which choose to rent an on-site van or hire-purchase a van and place it on a rented site, compared with those that rent traditional housing.
- The purchase of a strata title on which to place a hire-purchased or cash purchased van will confer greater long-term asset gains for all groups than the rental of sites in caravan parks because of the capital gains associated with acquisition of a site.
- Despite its apparent short-term advantages, the least effective option in terms of long-term asset creation appears to be the cash-purchase of a van with its placement on a rented site, mainly as a result of the low end value of the van and the effect of the immediate dispersal of initial capital, which prevents effective long-term asset creation; and

• The hire purchase of a van on a rented site as opposed to the cash purchase of a van on a rented site improves the asset position of a household significantly, due to the short repayment period and the fact that initial capital is not allocated to a relatively expensive cash purchase, even though cash outflow may be higher for the household during the period of the purchase agreement.

On the basis of this analysis, the study carried out for the Australian Housing Research Council (Purdon 1994) concluded that households with low incomes, no assets and renting an on-site caravan for long periods of time will experience a long term asset position similar to that which tenants in conventional private renting experience. It is not clear, then, whether caravan park dwellers face a significantly different affordability position over the longer term than conventional renters, or that costs advantages of caravan renting are a positive attraction for some.

Nevertheless, there is some indication that some caravan park residents are facing high costs relative to incomes. A pilot study of site rental charges of caravan parks situated on the New South Wales central coast revealed that some parks charge \$120 per fortnight just to rent a site. This means that retirees are paying up to 48 per cent of their pension (including rent assistance) to live in their own home on residential parks (Connor 2001a). It is known that paying 30-50 per cent of fixed income in private rental costs 'represents a significant risk factor in generating future homelessness' (Burke 1999; DHHCS 1991). Clearly, caravan park residents paying this level of income in rent as therefore vulnerable to homelessness.

2.6. Taxation

The New Tax System, the centre-piece of which is the Goods and Services Tax (GST), became effective in July 2000. The GST is applied differently in different rental situations with a distinction being made between private and commercial residential property. It has had implications for the costs of living in caravan accommodation.

In order to avoid price exploitation arising from the introduction of the GST and compliance with the law, the Australian Competition and Consumer Commission (ACCC) reviewed the position of caravan parks following a number of inquiries and complaints in relation to price adjustments for caravan parks and the relocatable home park sector. It found that price adjustments to reflect the GST were generally within the ACCC's expectations and that the level of re-pricing was not unreasonable having regard to the New Tax System changes alone (ACCC 2001).

However, the Commonwealth's decision to levy the GST on rents for caravan parks and relocatable homes (and boarding houses) providing commercial accommodation has impacted significantly on many permanent caravan park residents. One political commentator has argued that the decision to apply the GST to long term residents living in caravan parks undermines the National Homelessness Strategy as the Strategy specifically identifies people living in caravans as being at high risk of homelessness (Albanese 2001). While people receiving maximum Commonwealth Rent Assistance will receive a 10 per cent increase to compensate for the GST, this only affects a small number of residents. Just 3,955 caravan residents live on reduced amounts of Commonwealth Rent Assistance and must bear the cost of a GST related rent increase (*Sydney Morning Herald* 26.07.00).

Despite lobbying by affected residents and welfare organisations, the GST on caravan park site rental was not removed in the May 2001 Federal Budget (*Sydney Morning Herald* 24 May 2001:1).

This means that for many people, caravan parks are an increasingly expensive rental option.

The effects of the GST on long term residents in caravan parks remains controversial because of the differential treatment of providers of commercial residential property (such as caravan parks and boarding houses) as compared to landlords in mainstream private rental housing, public housing landlords and community housing organisations (Wood and Forbes 2001). This is because residents in caravan parks (and boarding houses) are subject to the full GST rate of

10 per cent for the first 27 days of their tenancy, and thereafter at a concessional rate putting such residents at a disadvantage because other providers are input taxed only (Wood and Forbes 2001).

As noted above, research undertaken by Yates and Wulff (2000) has shown that low income private rental housing is in decline in Australia and, according to Wood and Watson (2001), one of the contributing factors is the effect of tax changes such as the GST on the capital costs. Wood and Forbes (2001) are currently undertaking research into the effect of the GST on the proprietors of caravan parks and boarding houses, extending earlier research that focussed on individual landlords of residential housing.

2.7. Insecurity of tenure

The lack of security of tenure and disregard for tenancy rights of permanent residents in caravan parks has been an issue for many decades and continues to pervade this sector of the housing market. While there have been some improvements in terms of legislative changes to provide greater security of tenure in many jurisdictions, many caravan park residents remain at considerable risk of eviction and homelessness (Bostock 2001; Connor 2001b; Galloway 2001; Watling 2001).

During the 1990s some states introduced legislation that explicitly protects the tenancy rights of caravan park residents. These include the Residential Parks Act 1998 in New South Wales and the Queensland Residential Tenancies Act 1994. While these pieces of legislation are recognised as a major step forward for caravan residents in these States, many tenants still fall victim to unscrupulous caravan park managers who have the power to 'summarily evict' tenants without grounds (Mowbray 1994a: 96). The short comings in the legislation arise from the fact that security of tenure and tenancy rights depend on residents knowing and understanding their rights and being prepared to take action to protect their rights if the law is breached (Connor 2001b). Connor (2001b) has found that there is a range of barriers to tenants accessing their tenancy rights, including fear of the legal system, fear of losing the social acceptance of other residents and generating bad feelings between themselves and park management, and fear of homelessness. For many, if they were evicted from the park they have nowhere else to go.

Recent research from New South Wales suggests there is an inland/coastal divide in the position of caravan park residents with respect to security. Research carried out by the Park and Village Service (PAVS) for the New South Wales Department of Fair Trading suggests that residents in caravan parks in the Riverina/Murray basin and Western NSW were less likely to receive sufficient protection on tenancy issues compared to residents in parks on the coast, where there was greater awareness of tenants rights (PAVS 2000). Aboriginal residents of inland parks also appear to be particularly at risk of illegal eviction through both racism and lack of access to tenancy rights information (Gunyah Aboriginal Tenancy Service 2001).

2.8. Caravans as crisis housing

The Supported Accommodation Assistance Program (SAAP) is the national program assisting people who are homeless or at risk of homelessness through a range of support and supported accommodation services. State/Territory governments are responsible for the day-to-day administration of the program. Around 16,500 people are assisted by SAAP on any given night (AIHW 2000). SAAP support is provided alongside the Crisis Accommodation Program (CAP) which provides crisis accommodation for people who are homeless or in crisis. CAP is funded by the Commonwealth under the Commonwealth-State Housing Agreement (CSHA) and administered by State/Territory Housing Authorities.

One of the goals of SAAP is to help homeless people to establish the capacity to live independently. However, the increased targeting of affordable public housing noted above, and rising private rental costs has, it is argued, increased reliance on the marginal housing sector as a means to exit clients from SAAP services. Evidence suggests that a growing number SAAP service users are exiting the program into caravans In 1996-97, four percent of all SAAP service users exited the programs into caravans (Chamberlain 1999). In these

circumstances, caravan parks are serving a minimal social function by sheltering people at risk of homelessness (DFaCs 2000b).

There is also some evidence to show that caravan parks are being used as crisis housing *per se*. The use of caravan parks by SAAP services and other welfare agencies has been highlighted in a series of recent articles in *Parity*, the journal of the Council to Homeless Persons (Bostock 2001; Eddy 2001; Galloway 2001; Proudley and Wylie 2001; Tsorbaris 2001). The lack of affordable housing appears to be a major factor behind the use of caravan parks as crisis accommodation, together with increased targeting of public housing and rising private rental costs and a shrinking supply of both, as noted above (Bostock 2001).

The use of caravan parks as emergency accommodation has created a SAAP and housing policy paradox, where a potentially large population of people experiencing ongoing homelessness inhabit a marginal housing sector that is located just beyond the remit of the SAAP sector (Bostock 2001). Caravans are one element of this marginal housing sector: boarding houses and those living with family and friends are others. In this sense, caravan parks play a role as one component of the supply of marginally secure and impermanent accommodation for those in the most vulnerable housing situations.

2.9. Summary

In summary, there are a number of factors that indicate a proportion of caravan park residents are in a marginal housing position through lack of affordable or accessible alternatives. A variety of pressures have emerged in recent years to both restrict opportunities for housing for this group which have led to an increasing reliance on caravan parks as a housing choice of last resort. At the same time pressures on the park sector itself appear to be reducing the availability of caravans for this group of households. While the research evidence as to the marginal position of residents is mixed, it can be argued that these mounting pressures point to a higher risk of homelessness among permanent caravan park residents at the present. This research aims to shed further light on this issue.

3. CARAVAN PARKS AND THE RISK OF HOMELESSNESS

3.1. Caravans parks and homelessness

Through economic necessity or for other less apparent reasons, many people, often families, have turned to caravan parks as a form of permanent residence. Traditionally, these parks have been developed as short-term holiday accommodation which were not equipped with a range of services or facilities to cope with long-term living. Philp (1987) describes such households as living "at the margin" of Australian society brought about by poverty, legal restrictions, geographical and social isolation and sometimes cultural traditions. As mentioned previously, some researchers believe that those forced to live permanently in caravans are living in marginal housing and should be considered 'homeless'.

Chamberlain and Mackenzie (1998:19) maintain that homelessness is a relative concept that acquires meaning in relation to the housing conventions of a particular culture or community. In other words, homelessness is relative to the level of shared community standards about the minimum housing that people have the right to expect in order to live according to the conventions and expectations of a particular community. In Australia, the vast majority of the population lives in detached suburban housing or self-contained medium to high density housing. There is also a widespread acceptance that home ownership is the most desirable and secure form of tenure. In the private rental market, a tenant can expect to have as a minimum, a room to sleep in, a room to live in, kitchen and bathroom facilities of their own and to some degree, security of tenure. These have become the accepted minimum community standards of housing in Australia (Chamberlain and Mackenzie 1998:20).

Chamberlain and Mackenzie (1998:20) have identified four broad 'groups' of homelessness that fall below the community standard, ranging from:

- 'primary homelessness', people without conventional accommodation living on the streets, sleeping in parks, squatting in derelict buildings, or using cars or railway carriages for temporary shelter;
- 'secondary homelessness', people who move around frequently from one form of temporary shelter to another. These include people using caravans or boarding houses on an occasional or intermittent basis;
- 'tertiary homelessness', people living in single rooms on a medium to long-term basis, often sharing other basic facilities such as kitchen and bathroom, and lack any form of security of tenure;
- 'marginally housed', people in accommodation situations which are only slightly below the community norm, including people living in caravans without any form of security of tenure.

While valuable, this typology suggests that caravan parks function as a source of accommodation for households that might be facing secondary and tertiary homelessness, and be marginally housed. This is not necessarily an issue, as Chamberlain and Johnson (2001:44) contend that most homeless people move between various forms of temporary accommodation. Therefore, caravan parks may play a role for a range of households in varying states of homelessness. Indeed, Robinson (2003) argues that homelessness is a dynamic and eventful process and that it is 'iterative'. That is, that homelessness is "a nuanced trajectory of movement which is patterned in particular ways". Those people living long-term in caravan parks not through their own choice, are often living in circumstances which place them at risk of eviction, harassment and exploitation, thereby making them vulnerable to a continuing cycle of homelessness as they move from one from of accommodation to another. In addition, there may be many park residents who may consider themselves permanently housed, but find themselves at risk of homelessness due to the lower levels of security and the impact of site closure and transfer of sites to tourist accommodation.

It is also possible that low income caravan residents may have been evicted from public housing and/or private rental housing, suggesting that this group is also particularly vulnerable to housing risk and rests, perpetually, on the margins of homelessness (Bostock 2001).

Based on research and contact with caravan park workers over more than eight years, the National Dissemination Project identified the following groups of park dwellers as being at risk of homelessness:

- disadvantaged people living in caravan parks with a low standard of accommodation;
- people using caravans as crisis accommodation;
- people who move regularly between caravans and other forms of accommodation on a regular basis (Geggie and Eddy 2000).

Recent research by Berry (2002) concluded that not only are the lowest income earners and the most economically vulnerable at risk of homelessness, but low waged workers and their families are also at risk because Commonwealth Rent Assistance is not paid to low income workers who are renting "leaving them outside the total housing assistance system" (Berry 2002, 2001:14). Clearly, the target group this research will focus on compares closely to Berry's high risk group.

3.2. The policy response

As evidenced by the literature review for this paper, it was not until the mid-1980s that there was some official recognition that people lived in caravans as a permanent housing solution and these people experience particular difficulties, including a very real risk of homelessness.

Initial interest in the plight of people living permanently in caravan parks focused on the needs of families with children. For example, the Hunter Caravan Project in NSW began in 1986 as an investigative and experimental study because so little was known about conditions for families living in caravan parks. Over time, the Hunter Caravan Project has built a reputation for gathering data and information about caravan park dwellers and developing a National Dissemination Program of support and advocacy for the needs and rights of residents living long term in caravan parks (Geggie and Eddy 2000).

The National Dissemination Project at the University of Newcastle continues to play an active role in providing support and advocacy by hosting national seminars or conferences for caravan park workers (FAC 2002a and FAC 2001). The Project has also been involved in the development of a support plan for caravan park residents at risk of homelessness (DFaCS 2000b) and in piloting early intervention strategies for families with children and at risk of homelessness in three States and one Territory.

In 1993 the National Dissemination Project of the Hunter Caravan Project canvassed representatives from State/Territory and Local Governments and residents associations in each State and Territory regarding the status of caravan park living in their State/Territory. In 2001 the Program repeated the exercise with the same questions and produced a document comparing the replies. The results of the two surveys are summarised in the following tables for each State and Territory.

Status of Caravan Park Living 1993 and 2001 – Australian Capital Territory*

Question	1993	2001
1. Is it legal to live permanently in caravan park?	Yes. The ACT Housing Trust manages a long stay caravan park for owner-occupants on a long term or semi permanent basis, with both caravans & mobile homes.	Yes. ACT Housing used to own a long term park. The park was purchased by & is now managed by a community organisation (Koomari).
2. What % of the population live in caravan parks?	At 1986 Census, 727 people lived in caravan parks, representing 0.3% of ACT population. By 1991 Census, there were 778 people living in caravan parks (0.3%).	There are only 3 caravan parks in the ACT. 1991 Census there were 550 residents in caravan parks & by 1996 this dropped to 340, 0.1% of the ACT population.
3. What standards have been developed for regulation of the industry?	No regulatory standards developed. The Government is able to impose conditions on leasing arrangements with the park lessee. If conditions not adhered to, action can be taken to ensure compliance.	There are no standards or specific regulations for caravan parks & residents. Conditions for residents contained in lease agreements & adequacy of protection is limited to how comprehensive the terms are – generally not very comprehensive.
4. What is the situation relating to security of tenure?	Dept of Environment, Land & Planning is considering a proposal to enable owners of mobile homes to 'sub-let' land from proprietors of mobile home parks. If this can be achieved, then financial institutions would accept the sub-lease as a mortgageable property. The rights of residents & park owner will be addressed.	In 1995, as part of the development of new residential tenancy legislation, the Community Law Reform Committee produced a consultation paper on the need for Residential Tenancy law in relation to caravan parks and relocatable home parks. There has been no further work on this issue. The <i>Residential</i> <i>Tenancies Act 1997</i> does not apply to caravan parks. Residents' protection limited to individual lease agreements. Residents can seek redress through the Small Claims Court or the Magistrates Court.
5. Are any caravan parks designated as Retirement Villages?	No caravan parks are designated as Retirement Villages.	No caravan parks are designated as Retirement Villages.
6. What Government agencies are involved in the control of standards & tenancy matters?	The Dept of Environment, Land & Planning is responsible for the planning & administration of the leasehold system of land tenure in the ACT.	The Dept of Urban Services is responsible for planning & administration of the leasehold system of land tenure in the ACT. Dept of Justice & Community safety is responsible for tenancy legislation.
7. How adequate is current legislation?	Caravan parks in the ACT not regulated by legislation, the land use is subject to the lease. The Community Law Reform Committee preparing a report on landlord/tenant relations in the ACT & expected to report by 1994.	There is currently no legislation & this is clearly inadequate. There have been calls for further work on the development of such legislation as part of the review of the <i>Residential Tenancies Act 1997</i> .

ACT information: 1992 ACT Dept of Environment, Land & Planning. 2002 Tenants Union ACT.

Status of Caravan Park Living 1993 and 2001 – New South Wales*

Question	1993	2001
1. Is it legal to live permanently in caravan park?	Yes, since the introduction of Ordinance No. 71 on 1 Dec 1986. Parks may be divided into long and short term residence. Standards are higher for long term sites.	Yes, since 1986.
2. What % of the population live in caravan parks?	It is not possible with any degree of certainty to determine the number of people occupying sites in caravan parks long term. As at 30 th June 1990, the population of NSW was 5,826,800 (ABS). The number of long term sites on caravan parks at that time was 22,371.	It is estimated that less than 1% of NSW's population resides in residential parks. There are up to 40,000 permanent residents of parks in NSW. About 25,000 park sites in the 950 NSW parks may be used for permanent occupancy.
3. What standards have been developed for regulation of the industry?	Standards developed for regulation of the caravan park industry are found in Ordinance No. 71 under the Local Government Act.	Tenancy aspects dealt with under the <i>Residential Parks Act 1998</i> and the <i>Residential Tribunal Act 1998</i> . Local Government aspects by regulations under the <i>Local Government Act 1993</i> .
4. What is the situation relating to security of tenure?	Protection of residents and leasing arrangements are covered by the <i>Residential Tenancies Act</i> . Security of tenure is covered in the Code of Practice for the Caravan/Relocatable Home Industry developed by the Dept of Housing. Section 289K of the <i>Local</i> <i>Government Act 1993</i> permits subdivision for purposes of leasing up to 20 years.	The <i>Residential Parks Act</i> includes a number of important benefits for permanent residents. E.g.: Standard tenancy agreements, limits on electricity and water charges, park liaison committees, sale of homes on sites, & dispute resolution mechanisms. Park owners must have reasons for termination and compensation may be payable if residents are required to vacate. An order of the Residential Tribunal must be obtained before possession of a site may be taken by the park owner.
5. Are any caravan parks designated as Retirement Villages?	It is believed that several licensed caravan parks are designated as "Retirement Villages', however the Dept of Fait Trading does not keep any records regarding this issue.	The definition of 'retirement village' in the NSW <i>Retirement Villages Act</i> 1999 specifically excludes residential parks. It is an offence to represent a complex as a retirement village if it is not within the meaning of the legislation.
6. What Government agencies are involved in the control of standards & tenancy matters?	Standards: Local Councils, Dept of Local Government & Co-operatives, Dept of Conservation & land Management. Tenancy matters: Dept of Housing, Tenancy Service.	Standards: The Dept of Urban Affairs & Planning. Tenancy matters: The Dept of Fair Trading.
7. How adequate is current legislation?	The legislation is considered adequate. Problems of a technical nature may, as a last resort, be resolved through the Land & Environment Court. Tenancy problems may be resolved through the Residential Tenancies Tribunal.	The <i>Residential Parks Act</i> considered to be adequate for dealing with the major concerns of park residents, but continues to be monitored by the Dept of Fair Trading. Planning Dept of the view that there are no serious deficiencies with the Regulations.

NSW Information: 1992 Dept of Local Government & Cooperatives. 2001 Dept of Fair Trading.

Status of Caravan Park Living 1993 and 2001 – Northern Territory*

Question	1993	2001
1. Is it legal to live permanently in caravan park?	Yes.	Yes
2. What % of the population live in caravan parks?	Unknown. ABS advises that there were 1,151 sites within caravan parks occupied by long term guests as at June 1992. There are no figures for average occupancy available. The Territory population as at March 1992 was 168,600.	Unsure. Latest ABS data is dated 1996.
3. What standards have been developed for regulation of the industry?	Regulation of standards is covered in the schedule to the <i>Caravan Parks Act</i> .	<i>Caravan Parks Act 1975</i> was brought in after cyclone Tracy when vans were brought in for construction workers & temporary homes. This applied only 26 kms from Darwin GPO. The Act is now repealed. No plans at present to introduce new legislation.
4. What is the situation relating to security of tenure?	Security of tenure is on an agreed resident/management rental/occupancy basis and conformity with other management rules within the park.	None at all. 1997-98 new <i>Tenancy Act</i> does not apply to caravan park residents.
5. Are any caravan parks designated as Retirement Villages?	No parks are designated as 'Retirement Villages'.	No parks are designated as 'Retirement Villages'.
6. What Government agencies are involved in the control of standards & tenancy matters?	The Office of Local Government has administrative responsibility for the <i>Caravan Park Act.</i> Other government bodies involved through responsibility for other Acts and Regulations are the Power & Water Authority, Dept of ands and Housing, Dept of Health & Community Services, Northern Territory Service and the Police.	Dept of Business, Industry and Resource Development.
7. How adequate is current legislation?	Current legislation only covers caravan parks within a 26kms radius of the Darwin GPO. Complaints over recent years have been minimal. The <i>Act</i> is currently under review.	No specific legislation.

NT information: 1992 Office of Local Government. 2001 Dept of Local Government.

Status of Caravan Park Living 1993 and 2001 - Queensland*

Question	1993	2001
1. Is it legal to live permanently in caravan park?	The legality of living permanently living in caravan pars subject to the whims of local authorities. However, most authorities have developed ordinances to cater for more permanent mobile home parks.	Yes. The <i>Mobile Homes Act</i> 1989 provides for written agreements with the park operator to secure a particular site. The agreement remains in force until terminated by either party. The <i>Residential</i> <i>Tenancies Act</i> 1994 applies to renters of caravans, caravan park sites and mobile homes for periodic & fixed term tenancies.
2. What % of the population live in caravan parks?	According to 1986 Census 58,000 residents living in caravan or mobile home parks. About 30% of Australia's park population.	According to 1996 Census about 40,000 people reside in mobile homes, house boats, cabins & caravans. The Office of Fair Trading data suggests approx. 10,000 mobile home owner occupied dwellings subject to the <i>Mobile Homes Act</i> 1989.
3. What standards have been developed for regulation of the industry?	Dept of Housing, Local Government and Planning developing a model code for caravan and relocatable parks.	Residential Tenancies Act 1994 provides security of tenure based on written agreements (other than for short tenancies) & outline rights & responsibilities. Also provides for dispute resolution, maintenance of basic facilities & application of park rules. Failure to comply may result in penalties. All Local Councils must develop their own local laws relating to health aspects.
4. What is the situation relating to security of tenure?	Mobile Homes Act 1989 offers protection to a small section of the park community. Residential Tenancies Act being expanded to include those not already covered.	Under the <i>Mobile Homes Act 1989</i> written agreements to secure rental of a site. Under <i>Residential Tenancies</i> <i>Act 1994</i> provides for short (up to 42 days with 1 renewal) & long (fixed or periodic) term tenancies, and requires written agreements, a statement on rights & responsibilities, condition reports, obligations for park rules & processes for breaches of agreements.
5. Are any caravan parks designated as Retirement Villages?	No parks are designated as 'Retirement Villages'.	No parks are designated as 'Retirement Villages'.
6. What Government agencies are involved in the control of standards & tenancy matters?	Dept of Housing, Local Government & Planning & Dept of Justice & Corrective Services.	Building Code of Australia applies to relocatable homes. BCA administered by LG. Dept of LG & Planning. Residential Tenancies Authority.
7. How adequate is current legislation?	Totally inadequate, except in the case of mobile homes.	Residential Tenancies Act monitored on a continual basis. <i>Mobile Homes</i> <i>Act 1989</i> under review.

Qld information: 1992 courtesy of Caravan & Mobile Homes Residents Association. 2001 combined Qld agency response.

Status of Caravan Park Living 1993 and 2001 – South Australia*

Question	1993	2001
1. Is it legal to live permanently in caravan park?	Yes.	Yes.
2. What % of the population live in caravan parks?	Based on available statistical data, a Task Force estimated that some 4,000 people reside in caravans. Estimated total population of SA in 1991 was 1,454,443.	According to ABS, number of residents decreased by 38% between 1991 & 1996.
3. What standards have been developed for regulation of the industry?	The key industry association has developed a code for long term residency in caravan parks.	The Caravan Parks Association released a new Code of Practice in Nov 2000. Covers permanent living, occupancy, conditions for termination, planning & building & health & safety.
4. What is the situation relating to security of tenure?	Residents in on site and 'fixed' van or cabin come within the provisions of the <i>Residential Tenancies Act</i> . Other residents have recourse only through civil action or Office of Fair Trading.	Limited & uncertain coverage of agreements between landlord & tenant of caravans under the <i>Residential Tenancies Act</i> . The Act does not apply to a resident who owns the caravan and rents the allotment. Security of tenure is addressed in Cod eof Practice from the industry association.
5. Are any caravan parks designated as Retirement Villages?	No parks are designated as 'Retirement Villages'.	Currently 5 'age specific' residential parks in SA, 2 of which are manufactured homes sites. 1 of which is seeking to be designated as a retirement village.
 6. What Government agencies are involved in the control of standards & tenancy matters? 	Standards: Local Government Councils, Local Boards of Health, SA Housing Trust, Metropolitan & Country Fire Service.	The Office of Consumer & Business Affairs, Residential Tenancies Tribunal, Local Government Authorities & the SA Housing Trust.
7. How adequate is current legislation?	A Task Force has prepared a report on long term residency in caravan parks. Awaiting Cabinet endorsement for release. The Task Force identified current legislation relating to planning & zoning inadequate & major shortcomings in relation to consumer protection issues. This was most evident in respect of mobile rental vans not being covered by the Residential Tenancies Act & lack of tenancy protection for individuals who rent a site only.	No recent legislative changes in SA that deal with the caravan & mobile home park industry. A Private Members Bill, the Residential Tenancies (Caravan & Transportable Home Parks) Amendment Bill 2001, was introduced in the House of Assembly on 5 July 2001.

SA information: 1992 SA Housing Trust. 2002 Office of Consumer & Business Affairs.

Status of Caravan Park Living 1993 and 2001 – Tasmania*

Question	1993	2001
1. Is it legal to live permanently in caravan park?	Yes.	Subject to local Council by-laws governing Council controlled caravan parks where they occur, it is still legal to live permanently in a caravan park.
2. What % of the population live in caravan parks?	Less than 0.4%.	No current statistics, but unlikely to exceed 0.5%.
3. What standards have been developed for regulation of the industry?	No specific code of regulations has been drawn up to cover this industry.	No specific code for caravan parks, except that standards applicable to tourism accommodation which are the responsibility of the Licensing Commission.
4. What is the situation relating to security of tenure?	These matters are sorted out between landlord & tenant. No complaints have surfaced at this time.	Security of tenure is a matter between park management, owners and lessees.
5. Are any caravan parks designated as Retirement Villages?	There are no caravan parks or manufactured home communities designated as 'Retirement Villages'.	There are no caravan parks or manufactured home communities designated as 'Retirement Villages'.
6. What Government agencies are involved in the control of standards & tenancy matters?	The Licensing Commission has some control over caravans but this is primarily in relation to tourism.	The Licensing Commission & the Consumer Affairs Division of the Department of Justice & Industrial Relations in relation to tenancy issues.
7. How adequate is current legislation?	No major problems have arisen so for the present the situation appears to be adequate. However, the need to address specific legislation may well increase in the years ahead.	Local Councils are seeing issues emerge in relation to planning scheme and permanent residency in caravan parks. No action yet.

Tas information: 1992 Local Government Office. 2002 Dept of Premier & Cabinet.

Status of Caravan Park Living 1993 and 2001 - Victoria*

Question	1993	2001
1. Is it legal to live permanently in caravan park?	Yes, it is legal to live permanently in caravan parks & manufactured home communities in Victoria.	Yes, it is legal to live permanently in caravan parks & manufactured home communities in Victoria.
2. What % of the population live in caravan parks?	There are no clear figures available regarding the percentage of the State's population living in these communities, an estimate is between 12,500 & 20,000.	ABS Census data from 1996 indicates that 9,362 people live in caravan parks, approximately 0.2% of the population. 3,745 residents rent the caravan & the site, while the remainder own their van & rent the site.
3. What standards have been developed for regulation of the industry?	Standards for regulation of the caravan park industry are currently being formulated.	Caravan parks are regulated by the Residential Tenancies (Caravan Parks & Movable Dwellings) Regulations 1999, covering design standards, fire safety, water & sewerage standards & licensing requirements. The Residential Tenancies Act 1997 prescribes the rights & responsibilities of park owners & residents, however it is only applicable once a resident has lived in a park for 90 consecutive days, unless by written agreement with the park owner. The Building Act 1993 and the Health Act also apply.
4. What is the situation relating to security of tenure?	In February 1989 the Caravan Parks & Movable Dwellings Act was proclaimed followed by the Amendment Act 1989. The legislation provides a degree of protection for tenants including access to the Residential Tenancies Tribunal.	Once a resident is covered by the <i>Residential Tenancies Regulations</i> 1999, the legislation provides a degree of protection for residents, including access to the Victorian Civil & Administrative Tribunal. 90 day "no reason" notices to vacate are a concerning feature of the legislation. The Act is currently under review.
5. Are any caravan parks designated as Retirement Villages?	There are parks in Victoria which have been designated by the owners as 'Retirement Villages".	A small number of parks in Victoria are operated as Retirement Villages, but no solid data. Some parks advertise as providing a retirement option.
6. What Government agencies are involved in the control of standards & tenancy matters?	The Dept of Housing, the Office of Local Government and local Councils, the Minister for Fair Trading & Women's Affairs.	Office of Housing for public/social housing system, housing policy, Consumer & Business Affairs Victoria for funding for tenancy services, enforcement/compliance with the RTA, Dept of Infrastructure and local Councils for enforcement/compliance of health & building codes, & Dept of Justice for funding & operation of the Tribunal.
7. How adequate is current legislation?	The Caravan Park Residents' Network believes the legislation falls short of its intentions.	Current legislation ineffective in dealing with key issues, including affordability, standards, & security of tenure. Lack of enforcement an issue.

Vic information: 1992 Caravan Park Residents' Network. 2001 Tenants Union of Victoria.

Status of Caravan Park Living 1993 and 2001 – Western Australia*

Question	1993	2001
1. Is it legal to live permanently in caravan park?	Under Caravan Park By-laws adopted by most local governments a person cannot remain in a caravan park for more than 6 months in any 1 year, except with the approval of Council.	Yes.
2. What % of the population live in caravan parks?	Unknown. ABS indicates that as at 30 th June 1993, 4,950 sites were occupied by permanents. If 2.5 persons per van, then approximately 12,375 people (of a population of 1.6m) live permanently in caravan parks.	Unknown. Dept does not collect this information. Need to check with ABS.
3. What standards have been developed for regulation of the industry?	Caravan park industry regulated under the <i>Health Act</i> of WA and by individual by-laws adopted by local Councils. New regulations currently being prepared.	The Western Australian Caravan Parks and Camping Grounds Regulations 1997.
4. What is the situation relating to security of tenure?	Residential tenancy protection specifically provided for in the <i>Residential Tenancy Act &</i> <i>Regulations</i> . Minimum 60 days notice of termination of tenancy to be given. Rent increases 60 days notice must be given & thereafter 6 months notice to be given. The <i>Act</i> provides for a lease agreement, but it is not known whether any tenant is occupying a site in a caravan park pursuant to a lease agreement.	Security of tenure is covered for a permanent tenant in a caravan park under the Residential Tenancy Act, administered by Dept of Consumer & Employment Protection.
5. Are any caravan parks designated as Retirement Villages?	No. Not to the Dept of Local Government's knowledge.	No.
6. What Government agencies are involved in the control of standards & tenancy matters?	Dept of Local Government responsible for preparation of model by-laws for caravan parks & are used to regulate and licence caravan parks. Dept of Health enacts regulations to provide minimum requirements for health matters. Ministry of Consumer Affairs responsible for <i>Residential</i> <i>Tenancy Act & Regulations</i> regarding tenants' and owners' rights & duties.	Standards: Dept of Local Government & Regional Development. Tenancy: Dept of Consumer & Employment Protection.
7. How adequate is current legislation?	The legislation at the time was seen by Government as being insufficient to deal with the needs of the industry. New legislation was being prepared.	Current legislation appears to be dealing adequately with the licensing, regulation and standards of caravan parks in WA. However, the Government in its election platform is considering greater tenancy protection for permanent residents in caravan parks.

WA information: 1992 Dept of Local Government. 2001 Dept of Local Government.

^{*} Source for all the above tables: National Dissemination Project, Family Action Centre (2002), *National Overview* 1993-2001, University of Newcastle.

This comparative assessment showed that there were still disparities in the approach to issues around caravan park residency and that in some jurisdictions the situation had not changed markedly in the period 1993-2001. The issues confronting permanent residents in caravan parks are, therefore, much the same today as they were more than a decade ago. They include:

- lack of security of tenure;
- inadequate housing standards;
- high prevalence of homelessness;
- minimal access to community, health and education services;
- lack of knowledge about and lack of support in asserting tenancy rights; and
- a range of social justice issues (DFaCS 2000b).

In some respects, the level of housing risk amongst certain groups living in caravan parks is as great now as it was more than two decades ago.

3.3. Summary

In summary, the caravan park sector is highly segmented. It is used as permanent, temporary and crisis accommodation depending on income and personal circumstances. There are also marked regional differences between populations found in coastal as opposed to inland or metropolitan parks. Little in-depth research exists, however, that explores the geographic spread of parks and the potential for homelessness among different population types. The incipient nature of homelessness for caravan park residents is often hidden due to the mobility of people from one park to another (Whittish 1999). These factors impact on policy makers' ability to put appropriate preventative measures and housing support services into place. Taken together, the dearth of information about the marginally housed in caravans and the complexity of factors affecting homelessness, makes this a vexing area for public policy.

4. THE RESEARCH PROJECT

4.1. Methods

The research aims to address the set of seven research aims set out in Section 1 of this positioning paper. To achieve this, the research will involve a mixture of qualitative and quantitative techniques in order to develop an in-depth picture of risk factors and groups as well as location of people vulnerable to homelessness in the caravan housing market. This will allow for the triangulation of results at the analysis phase.

The project will focus on three jurisdictions (NSW, SA and NT) in order to build upon the Federal government initiative, Caravan Parks Family Crisis Child Care Pilot Project, which aims to support vulnerable families in selected caravan parks in each of these states/territory. Queensland is also part of this initiative.

The study team recognises that Queensland houses more people as permanent residents of caravan parks than other states/territories. This study aims to build on both, previous work on housing choices for caravan park residents in Queensland (see Purdon Associates Pty Ltd 1993; Greenhalgh, *et al*, 2001) and contribute to current work examining changes in caravan park supply in this state.

The aims of the project are to:

- 1. develop typology of caravan parks sorted by geographical location and resident population;
- 2. provide a profile of groups who are vulnerable to homelessness among caravan park dwellers,
- 3. identify the risk factors among groups likely to promote housing crisis;
- 4. analyse pathways into caravan parks and incidence of incipient homelessness;
- 5. explore the potential pathways out of this form of marginal housing; and the policy supports needed to effect this;
- 6. assess the benefit of early intervention among caravan residents 'at risk' of homelessness;
- 7. contribute to the development of current AHURI funded research on predictors of housing vulnerability and incipient homelessness at the UNSW/UWS AHURI Research Centre.

The project will involve five main stages:

- 1. Analysis of existing data sources to provide background data on number and composition of caravan parks, and the current status of the caravan park sector;
- 2. Caravan park audit that will identify location and type of caravan park population;
- 3. Semi-structured interviews with key contacts in the case study states/territories;
- 4. Focus groups with caravan park residents identified as in vulnerable housing situations in six sites.
- 5. Analysis of future data sources, specifically, the 2001 ABS Census Data.

4.2. 4.2 Analysis of existing data sets

Stage 1 will address research aims 1 and 2. It will provide background data on number and composition of caravan parks and profile of caravan park dwellers. This will be achieved through:

- analysis of ABS Tourist Accommodation data. These data will provide total number of caravan parks across Australia by size and resident population (permanent or visitors).
- production of socio-demographic profile of caravan residents using the 1996 and 2001 (where available) ABS Census data.

Stage 1 will also address research aims 3 and 4 through:

 analysis of the 1996 ABS Census Confidentialised Unit Record File (CURF) to explore the social profile of caravan residents. This will provide an up-to-date profile of caravan park dwellers. More importantly, this would allow comparison of data between the two census years. Given the changing nature of caravan park supply (declining long-term sector) change analysis will be crucial to an understanding of future demand for this form of accommodation and impact on services.

4.3. Caravan park audit

Stage 2 will also address research aims 1 and 2. It will produce new data on the location and type of resident population in each case study State/Territory. Stage 2 will involve triangulation of different data sources to identify geographic spread and number of parks that accommodate 'difficult to house' clients. This will be achieved through:

- a postal survey of local government authorities in NSW (177) and SA (69). The survey of caravan parks in the NT is to be undertaken through the NT Government as almost all of the local Councils in the NT have very little responsibility, if any, over caravan parks. Local government officers responsible for the caravan park portfolio will be asked to comment on numbers of parks in their area; nature of the population (tourist, permanent or temporary) found in each park; and how many people are housed in each park. Additional information will be sort on the changing nature (if applicable) of the local caravan park market and its implications for residents and local housing and support services;
- the Department of Local Government or other Planning agencies in each state/territory may also hold information on location, ownership and planning regulations pertaining to caravan parks. It may be possible to request data of this kind from these agencies;
- these data will be supplemented by data from other local experts (e.g. tenancy rights and caravan park workers) in order to build up a picture of the spatial distribution of park populations.

It is recognised that the caravan park audit will rely on self-reported data. It will, however, facilitate development of a typology of parks and provide a profile of those vulnerably housed in this sector of the marginal housing market.

4.4. Semi-structured interviews

Stage 3 will address research aims 3 to 5. Semi-structured interviews will be conducted with key contacts at both state/territory and local level in the same States/Territory as the case studies. It is envisaged that:

- at the state/territory level interviews will be conducted with senior policy officers in Housing; SAAP, Family and Children's Services; Residential Tenancy Agencies; Local Government and Social Planning Agencies.
- at a local level, interviews will be conducted with tenancy rights workers, community workers and caravan park workers.

Interviews will examine perceptions of risk among social housing clients in caravan parks; changing nature of caravan park sector; locational differences between parks; and policy implications of the above factors.

In addition, caravan park managers will also be interviewed where possible. Park managers are uniquely placed to describe the changing nature of their clientele and factors that they feel impact on incipient homelessness. Park managers will be asked to make forecasts about how many people that they turn away and the reasons that impact on this decision. These data will be used to provide an indication of unmet need.

It is envisaged that up to 10 interviews will be conducted per state/territory. All interviews will be taped and transcribed.

4.5. Focus groups with caravan park residents

Stage 4 will address research aims 3 to 6. Focus groups will be held with caravan parks residents on six sites. It is anticipated that the project team will encounter considerable difficulties contacting caravan park residents. First, this is because park managers may be unwilling to give permission to researchers to interview residents (Purdon Associates Pty Ltd, 1993). Second, vulnerable residents of caravan parks may be fearful of repercussions from park managers (Park and Village Service, 2000). It is hoped that developing an alliance of key stakeholders (park managers, caravan park workers and tenancy workers) will facilitate access to residents.

It is anticipated that one focus group per caravan park will be undertaken. Focus groups will have 8-12 respondents per group and will last for around 1.5 hours. Discussions will be used to explore housing risk factors; perceptions surrounding security and stigma; use of government services; and anticipated housing futures. Respondents will have opportunity to comment on future preventive policies. These groups will be moderated by members of the research team. Discussions will be recorded and transcribed for analysis. A short questionnaire will also be completed by all participants after the group session to collect more detailed information on aspects of their housing situation. It is expected that data from around 50 respondents will be collected in this way.

4.6. Timetable

The timetable for the delivery of the project is as follows:

Work in Progress Report	28 Feb 2003
Final Report	17 April 2003
Research and Policy Bulletin	30 April 2003

It is hoped a seminar on the interim findings of the research will be presented in Hobart on 19 March 2003.

REFERENCES

Albanese, A. (2001) The GST and Caravan Parks, Parity, Vol 14, No 3, p.19.

Anthony, L. (2001) Caravan Parks Family Crisis Child Care Pilot Project, *Parity*, Vol 14, No 3, p.22.

Australian Competition and Consumer Commission (ACCC) (2001) Report to the Minister regarding the ACCC's monitoring of caravan park, relocatable home park and boarding house re-pricing as a result of the New Tax System changes. ACCC, Canberra.

Australian Council of Social Service (ACOSS) (2002) *Public and Community Housing: A Rescue Package Needed*. 14 October, ACOSS, Sydney.

Australian Institute for Health and Welfare (AIHW) (2000) SAAP National Data Collection Annual Report, Canberra, Australian Institute for Health and Welfare.

Berry, M (1994) *Closing Address*, in Lea, John P, *Manufactured Home Estates in Australia, Proceedings of the Newcastle Seminar, February 1994*, Ian Buchan Fell Research Centre, Faculty of Architecture, the University of Sydney and the National Dissemination Program of the Hunter Caravan Project, the University of Newcastle.

Berry, M. and Hall, J. (2001) *Policy Options for Stimulating Private Sector Investment in Affordable Housing Across Australia*. Prepared for the Affordable Housing National Research Consortium and AHURI, Melbourne.

Boer, B W (1978) 'From caravans to mobile homes', *Monash University Law Review*, Vol. 4, June.

Bostock, L. (2001) Housing Risk Among Caravan Park Residents, *Parity*, Vol 14, No 3, pp.6-8.

Bostock, L. (2000), *Report on the Technical Forum on the Estimation of Homelessness in Australia*, Canberra, 11-12 October, 2000. Paper commissioned by AHURI.

Burke, P. (1999), The Poverty of Homelessness, in Fincher, R. and Nieuwenhuysen, J. (eds.), *Australian Poverty: Then and Now*, Melbourne University Press, Melbourne.

Centrelink (2000), A Guide to Commonwealth Government Payments, Centrelink, Canberra.

Chamberlain, C. (1999), *Counting the Homeless: Implications for Policy Development*, Australian Bureau of Statistics (ABS), Canberra.

Chamberlain, C and Mackenzie, D (1998) Youth homelessness: Early intervention and prevention. Australian Centre for Equity through Education, Sydney.

Chamberlain, C and Johnson, G (2001) The debate about homelessness. *Australian Journal of Social Issues*, Vol. 36 No. 1, pp35-50.

Connor, J. (2001a) Affordability Crisis Looms for Retirees on NSW Parks, *Parity*, Vol 14, No 3, p.13.

Connor, J. (2001b) When the Hedge is Full of Holes: Implementation of the Residential Parks Act of NSW in Inland NSW, *Parity*, Vol 14, No 3, p.18.

Connor, J. and Ferns, S. (2002) No Place For Home: The Loss of Permanent Accommodation on NSW Residential Parks 2002, Department of Fair Trading NSW, Sydney.

Coopers and Lybrand W D Scott (1985) *Study into homelessness and inadequate housing*, Department of Housing and Construction, AGPS, Canberra.

Darcy, M and Randolph, B (2000), *Strategic Futures for Housing Assistance*, NSW Department of Housing, Sydney.

Department of Family and Community Services (DFaCS) (2000a) *National Homelessness Strategy: A Discussion Paper*, Department of Family and Community Services, Canberra.

Department of Family and Community Services (DFaCS) (2000b) *Working With Additional Needs Groups: A Support Plan for Caravan Park Residents at Risk of Homelessness.* Prepared by the National Dissemination Program of the Hunter Caravan Project of the Family Action Centre, University of Newcastle. DFaCS, Canberra. (see also Whittish 1999)

Department of Health, Housing and Community Services (DHHCS) (1991) *Long-Term Caravan park Residency – A Summary Compiled from Reports and Studies in Australia 1978-1991 (DRAFT)*, DHHCS, Canberra.

Department of Local Government and Administrative Services (DOLGAS) (1987) *The Costs of Permanent living in Caravan Parks*, AGPS, Canberra.

Eddy, G. (2001) Homelessness and Caravan Park Living, Parity, Vol 14, No 3, pp.23-24.

Family Action Centre (2001) *Report on the proceedings of the 2001 National Seminar for Caravan Park Workers, March 2001, Brisbane*, Family Action Centre, University of Newcastle, Newcastle.

Family Action Centre (FAC) (2002a) *National Overview – Status of Caravan Park Living in Australia 1993-2001*, compiled by the National Dissemination Program, family Action Centre, the University of Newcastle and published in the national newsletter *Insite*, February and July 2002. Family Action Centre, University of Newcastle, Newcastle.

Family Action Centre (FAC) (2002b) 9th National Conference for Caravan Park Workers, *March 2002* (with the Commonwealth Department of Family and Community Services and Onsite), Family Action Centre, University of Newcastle, Newcastle.

Galloway, J. (2001) Coverage For All is Needed Now, Parity, Vol 14, No 3, p.17.

Geggie, J. and Eddy, G. (2000) *National Dissemination Program of the Hunter Caravan Project: Final Report 1992-1999 to the Bernard van Leer Foundation*, Family Action Centre, University of Newcastle.

Gleeson, B. (1997), Australia's Changing Cities-Disintegration or Postmodern Revival?, *Welt Trends Zeitschrift fuer Internationale Politik und vergleichende Studien*, (Germany), Issue 17, University of Potsdam, Germany.

Gleeson, B. and Randolph, B. (2002) 'Social disadvantage and planning in the Sydney context', *Urban Policy and Research*, 20, 1. Melbourne.

Greenhalgh, E., Anderson, J. and Minnery, J. (2001) *Caravan Park Supply in South East Queensland: Implications of changes for residents, community and government,* Queensland University of Technology and Queensland Shelter, Brisbane.

Greenhalgh, E and Connor, J (2003) *No Place For Home: Residential Park Decline and Older People*, A paper presented at the 3rd National Homelessness Conference *'Beyond the Divide'* convened by the Australian Federation of Homelessness Organisations and held at the Sheraton Hotel, Brisbane, 6-8 April 2003. (Conference papers are available on the AFHO web-site at www.afho.org.au.)

Gunyah Aboriginal Tenancy Service (2001) Illegal Evictions Add to Koori Homelessness, *Parity*, Vol 14, No 3, p.16.

Industry Commission (1993a) *Public Housing: Volume 1,* Industry Commission, Canberra.

Industry Commission (1993b) *Public Housing: Volume 2: Appendices,* Industry Commission, Canberra.

JLGPHOWG (1986) Long-term living in Caravan Parks: Report by the Joint Local Government, Planning and Housing Officials Working Group, Canberra.

Kendig, Hal and Paris, Chris and with Neal Anderton (1987) *Towards Fair Shares in Australian Housing*. A report of the International Year of Shelter for the Homeless National Committee of Non-government Organisations, Canberra.

Kenny, T and Cox, M (1982) *Caravan Families: An Action Research Study into the Needs of Children and Families Living Permanently in NSW*, Lady Gowrie Child Care Centre, Erskineville.

Lovejoy, F. and Secomb, D. (2001) *Satisfaction with manufactured housing estate living* – *reconciling quantitative and qualitative findings*, Paper presented at the Australian Association for Social Research, May 2001, Novotel North Beach, Wollongong.

Mowbray, M (1994a) *Transforming the Great Australian Dream: The Quarter vs. the 30th of an Acre Block*, Urban Research Program, Working Paper No. 41, ANU, Canberra.

Mowbray, M. (1994b) Wealth, Welfare and the City: Developments in Australian Urban Policy, *Urban Policy and Research*, Vol 12, No.2, pp 91-104.

Mowbray, M. and Stubbs, J. (1996) "Manufactured Home Estates: Extending housing options or benchmarking cities?" in *Urban Policy and Research* Vol 14 No 2 pp 129 - 143

National Housing Policy Review (1989) Final Report, February (unpublished).

National Housing Strategy (1991a) *Framework for Reform*, Background Paper No. 1, NHS, Australian Government Publishing Service, Canberra.

National Housing Strategy (1991b) *Australian Housing: The Demographic, Economic and Social Environment*, Issues Paper No. 1, NHS, Australian Government Publishing Service, Canberra.

National Housing Strategy (1991c), *The Affordability of Australian Housing*, Issues Paper No. 2, NHS, Australian Government Publishing Service, Canberra.

National Housing Strategy (1992) *National Housing Strategy: Agenda for Action*, NHS, Australian Government Publishing Service, Canberra.

NSW Ministerial Task Force on Affordable Housing (1998), *Affordable Housing in New South Wales: The Need for Action,* The Report of the Ministerial Task Force on Affordable Housing.

Parks and Village Service (PAVS) (2000) *Getting to Residents of Inland Parks: A Report on a Consultation on NSW inland residential parks*. Sydney: Parks and Village Service-Combined Pensioners and Superannuants NSW inc., In association with Gunyah Aboriginal Tenancy Advice Service (funded by the NSW Department of Fair Trading).

Philp, H (1987) *Phase 1 Report to the Bernard van Leer Foundation*, Family Action Centre, University of Newcastle, Newcastle.

Proudley, M. and Wylie, N. (2001) Caravan Parks: A housing solution? *Parity*, Vol 14, No 3, p.8.

Purdon Associates Pty Ltd (1994) *Housing Choices for Caravan Park Residents*, Australian Housing Research Council, Australian Government Publishing, Canberra.

Randolph, B. and Holloway, D. (2002) 'The Anatomy of Housing Stress in Sydney', *Urban Policy and Research*, 20, 4, Melbourne.

Robinson, C. (2003) Understanding iterative homelessness: The case of people with mental disorders. Australian Housing and Urban Research Institute, Melbourne.

Rogan, B (1998) *Caravan park Communities: Building Commitment*, ONSITE, Vol. 1, Key Policy issues, Brisbane.

South Australian Department of Human Services (2000), *Ageing at Home: Development of a Housing Strategy for Older People,* Department of Human Services, Adelaide.

Tsorbaris, D. (2001) Bringing Caravan Parks from the Margins to the Centre, *Parity*, Vol 14, No 3, p.3.

Victorian Committee of Review of Long Term Residency in Caravan Parks (1983) *Long term residency in caravan parks in Victoria*, Final Report, Department of Community Welfare Services/Ministry of Housing, Melbourne.

Victorian Homelessness Strategy (2000), *Victorian Homelessness Strategy: Background Paper – Current Service System*, Victoria: Department of Human Services.

Watling, R. (2001) Caravan Parks and the Review of the Residential Tenancies Act 1997, *Parity*, Vol 14, No 3, p.14.

Whittish, L. (1999) *A Support Plan for Caravan Park Residents at Risk of Homelessness*, University of Newcastle, National Dissemination Program.

Wood, G. A. (2002) Promoting the supply of low income rental housing, *Urban Policy and Research*, Vol. 19. No. 4:pp.425-440.

Wood, G. A. and Forbes, M. (2001) *Fundamental tax reform and its impacts on alternative providers of rental housing*. Positioning Paper, AHURI.

Wood, G. A. and Watson, R. (2001) Marginal Suppliers, Taxation and Rental Housing: Evidence from Microdata, *Journal of Housing Research*, Vol. 12 (1).

Wood, M (2002) Homelessness and housing risk for caravan park populations, *Insite Newsletter*, Vol. 23, November.

Wulff, M (2000) *The 1998 National Survey of Rent Assistance Recipients: A Report on Key Findings*, Prepared for the Department of Family and Community Services, Canberra (www.facs.gov.au)

Yates, J and Wulff, M (2000) Whither Low Cost Private Rental Housing?, *Urban Policy and Research*, Vol. 18. No. 1:pp.45-64.

AHURI Research Centres

Sydney Research Centre UNSW-UWS Research Centre RMIT-NATSEM Research Centre Swinburne-Monash Research Centre Queensland Research Centre Western Australia Research Centre Southern Research Centre

Affiliates

Northern Territory University National Community Housing Forum



Australian Housing and Urban Research Institute Level 7 20 Queen Street, Melbourne Victoria 3000 Phone +61 3 9613 5400 Fax +61 3 9629 8536 Email information@ahuri.edu.au Web www.ahuri.edu.au