



For the
community
creators

Supporting Land Lease Communities

UDIA WA Position Paper
August 2025

Executive Summary

What are Land Lease Communities (LLCs)?

LLCs offer an affordable housing option for older Australians by separating the ownership of the home from the land it occupies. This structure allows residents to own their home while leasing the land, making them eligible for Commonwealth Rent Assistance (CRA). LLCs are typically secure, gated communities that provide high-quality shared facilities and foster a strong sense of community. They cater primarily to over-50s, including empty nesters, right-sizers, and retirees, and are designed to deliver services and communities for older Australians at scale while promoting better health and social outcomes.

Why do we need more LLCs in WA?

WA has an aging population but people are staying physically active and wanting to retain their independence, longer. They may not be ready for traditional retirement villages (RVs), need associated care facilities and meal services, or may be unable to afford the costs of RVs.

By providing a secure, low-maintenance, and affordable lifestyle alternative, LLCs could fill a gap between traditional homeownership and RVs as a crucial part of the housing continuum. They can support ageing-in-place and right-sizing to enable better use of WA's existing and new housing stock.

Over time and with the right measures in place, including suitable lending options, there could be an opportunity to cater to a broader target market.



The Urban Development Institute of Australia (UDIA WA) acknowledges the traditional custodians of the land on which we work, the Whadjuk people of the Noongar Nation. We also acknowledge the traditional Custodians across Western Australia and their continuing connection to the land and waters where our members operate.

We wish to acknowledge the strengths of their continuing culture and offer our respects to Elders past, present and emerging.

How do we get more LLCs in WA?

In WA, inconsistent, outdated and unclear legislative and planning frameworks hinder growth. Several levers need to be pulled to enable the expansion of LLCs in WA and fully embrace what the model has to offer as a response to the housing supply and affordability crisis and demographic shifts that are being experienced.

It is imperative that:



Both existing pathways (the *Caravan Parks and Camping Grounds Act 1995* and planning approvals under the *Residential Parks (Long-stay Tenants) Act 2006*) are retained to provide flexibility for operators to ensure timely delivery of diverse and affordable offerings for WA's ageing population. Both pathways are supported from an operational perspective by the *Residential Parks (Long-stay Tenants) Act 2006*.



A clearer link from Legislation to Planning for both pathways is implemented:

- For the *Caravan Park and Camping Ground Act 1995* and a planning use 'Park Home Park': i) clarity and support for home construction methods for a 'Park Home', and ii) refine definition of 'Park Home' to remove ambiguity for local governments and encourage industry investments.
- For planning approvals (with consideration to the R-Codes) under the *Residential Parks (Long-stay Tenants) Act 2006*: greater clarity for planning use definitions via either a 'Residential Park' (new use), or confirmation and broader adoption of existing planning definitions for 'Independent Living Complex'.



There is a consistent basis state-wide for the adoption of LLCs as a permissible land use, with a policy framework which facilitates wider roll-out.



Any legislative or planning changes seek to increase consistency in how LLCs are dealt with by approval authorities, giving due consideration to the rights, responsibilities and protections of both residents and owner-operators, to reduce barriers and facilitate their roll out.



Any legislative change at State level must not impact residents' eligibility for CRA, which is crucial for affordability.



Any changes introduced ensure there are no unintended consequences to the existing legislative frameworks that supports residents already living in LLCs across the state.



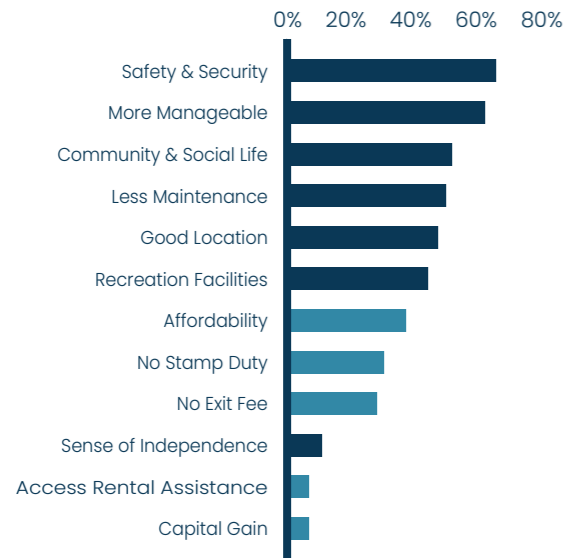


Perth metropolitan area is forecast to have a
24,000 dwelling shortfall by 2029

against the National Housing Accord target.

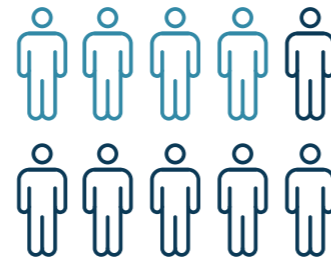
LLCs, which differ from Caravan Parks and Retirement Villages, **can fill a gap in the housing continuum and provide an affordable lifestyle option** for more over 50s, empty-nesters, right-sizers and retirees.

Reasons for moving into a LLC



Australians aged 50-84 years:

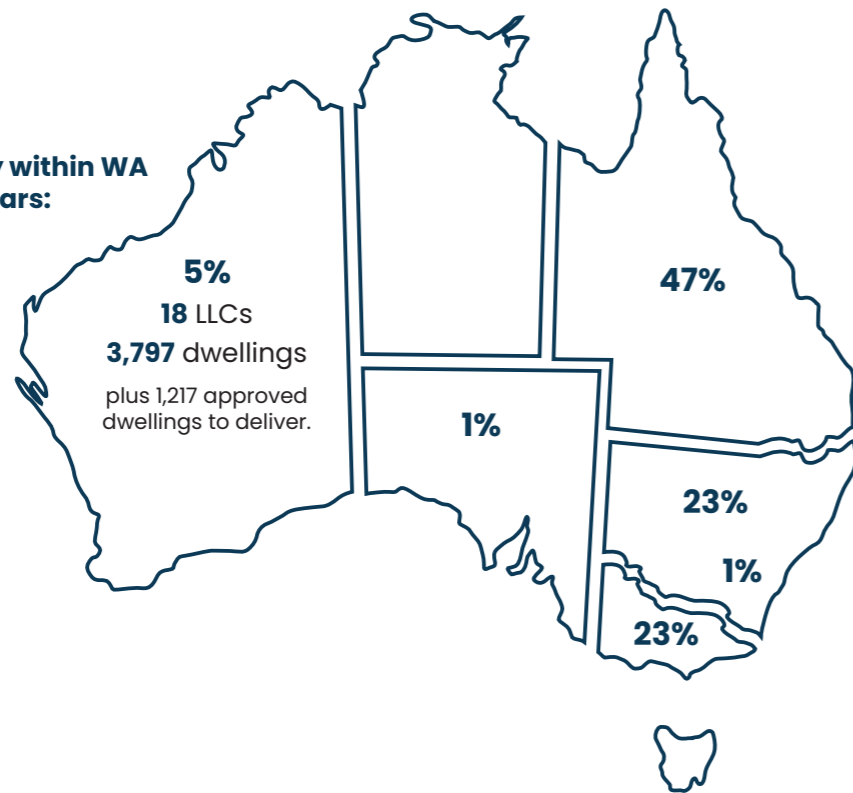
+39% from 2021 to 2041
 (an additional 3.3 million people)



Share of LLCs across Australia today

The opportunity within WA in the next 10 years:

20 LLCs
6,631 dwellings†



†Including 2 LLCs providing 347 dwellings with DAs approved and 8 LLCs providing 2,140 dwellings with DAs awaiting approval.

Sources: .id, WA operator data & CBRE 2025.

X Caravan Parks



- Aimed at short stay visitors, with some parks accommodating permanent residents to remain viable off-season.
- Long stay tenancies can involve living in a caravan, mobile home or park home.
- Modest facilities to suit tourist market, which long stay residents share.

Land Lease Communities



- Home and land ownership are decoupled, dwellings are moveable/relocatable, residents retain capital gains on sale.
- Aimed at permanent residents (based on lease period), who wish to remain home owners. Typically, over 50s, downsizers and/or retirees who are and want to remain physically active.
- Independent living lifestyle, with no care facilities or meal services.
- High quality shared facilities in gated communities.

X Retirement Villages



- Various ownership and occupancy options (freehold, long-term lease, rental), residents who own retain approx. 50-75% of capital gains on resale.
- Aimed at over 55s and retirees, with the accommodation designed for seniors.
- Some RVs have benefits like medical facilities, meal services, and are connected to aged care.



Detailed Considerations



About Land Lease Communities (LLCs)

LLCs allow homeowners to own a relocatable or moveable home within a gated community, while renting the land from an operator for a defined lease period. The rent (site fee) generally includes expenses to access and maintain shared common facilities and all land-related costs, including rates and taxes. Residents are responsible for the maintenance and upkeep of their own home and private garden.

The land lease model

- 

Operator acquires land, undertakes planning, design and development of homes and facilities
- 

Homeowner buys and has full ownership of their relocatable home
- 

Homeowner enters a long lease (60-99 years) and pays a weekly site fee to rent the land
- 

Homeowner gets access to community facilities and benefits from community management
- 

Operator owns the land and facilities and is responsible for operation and maintenance
- 

Operator receives income from the initial sale of the home and weekly site fee
- 

Homeowner rights protected under the *Residential Parks (Long-stay Tenants) Act 2006*

Although most LLC homeowners are of retirement age, LLCs are different to Retirement Villages (RVs) and generally attract more physically active residents, who wish to retain their independence and/or are unable to afford the costs of a typical RV. The services and lifestyle provided by the two are separate and distinct, as is the legislation they are governed by.

The purpose of an LLC is to provide the lessee with the stability of their own home in an environment that is secure and low maintenance. There are no services such as care facilities or meal services, it is a completely independent lifestyle for residents. Residents are also drawn to LLCs for reasons such as location; smaller homes; financial advantages and increased retirement income through rightsizing.

Park Home Park vs Residential Park LLCs

There are **two main pathways** to deliver LLCs in WA – “Park Home Park” and “Residential Park”. The following table sets out the main elements of each.

The LLC sector in Australia, Europe (known as Mobile Home Parks) and North America (known as Manufactured Home Estates) evolved from the caravan park industry. Many of the **Park Home Park LLCs** in WA were originally established as caravan parks and then converted. Many caravan parks in WA also operate with a mix of permanent residents and short-stay tourist accommodation. Income from long-stay residents helps parks remain viable off-peak seasons, allowing them to stay open year-round and support WA’s tourism industry with affordable holiday options. LLCs however provide a range of high-quality shared facilities to suit permanent living, as opposed to traditional caravan park offerings which have more modest facilities to suit the tourist market.

Residential Park LLCs are most aligned to the LLC national frameworks of other states, noting that each State has some commonalities and variances between requirements.

	Park Home Park	Residential Park
Relevant legislation	<ul style="list-style-type: none"> <i>Residential Parks (Long-stay Tenants) Act 2006</i>; or <i>Caravan Parks and Camping Grounds Act 1995</i>. 	<ul style="list-style-type: none"> <i>Residential Parks (Long-stay Tenants) Act 2006</i>
Planning pathway	<ul style="list-style-type: none"> Park Home Park. 	<ul style="list-style-type: none"> Residential Park is not defined in planning frameworks. Most aligned with “Grouped Dwelling” under the R-Codes or “Independent Living Complex” land use within the WAPC’s position statement on “Residential accommodation for ageing persons” (note: there are no specific acknowledgements in the position statement that directly confirms an Independent Living Complex is a Residential Park). However, LLC housing typology differs from “Grouped Dwelling” and therefore cannot comply with the full suite of “Grouped Dwelling” R-Code requirements.
Relocatability	<ul style="list-style-type: none"> Homes are required to be “Moveable”. Under the <i>Caravan Parks and Camping Grounds Act 1995</i> a park home means “a vehicle of a prescribed class or description that is fitted or designed for habitation”. 	<ul style="list-style-type: none"> Unlike the above planning definitions, the Residential Park pathway is not a defined planning use and requires dwellings to be “Relocatable” to comply with the <i>Residential Parks (Long-stay Tenants) Act 2006</i>. This ensures the home is considered a chattel (like a caravan, boat or car), not part of the land asset.
Area	<ul style="list-style-type: none"> Typically, previously rural zoned and tourism areas. 	<ul style="list-style-type: none"> Urban areas, such as part of masterplanned communities.
Land tenure	<ul style="list-style-type: none"> Single ownership by an Operator, with site leases taken by each Resident. Home ownership lies with residents and in some circumstances to improve affordability, some LLC operators have a lower home price and a Deferred Rental Fee (DRF) upon resale[†]. 	<ul style="list-style-type: none"> Single ownership by an Operator, with site lease taken by each Resident via Site Only Agreement. Home ownership lies with residents and they retain any associated capital gains. Operators may offer DRF, zero DRF or provide a choice between the two[†].
Lease approvals	<ul style="list-style-type: none"> Approved by WAPC, usually 60 years. 	<ul style="list-style-type: none"> Approved by WAPC, usually 60 years but can be up to 99 years.
Home construction	<ul style="list-style-type: none"> Traditionally provided by modular offsite (volumetric) construction to meet moveable parameters. 	<ul style="list-style-type: none"> Either built on or off-site, designed to be relocated in sections or by a defined methodology to suit relocation parameters.
Consumer protection	<ul style="list-style-type: none"> Site Agreements are set out in an approved form within the relevant legislation, providing strong protections to homeowners. Under the <i>Residential Parks (Long-stay Tenants) Act 2006</i>, operators are required provide prospective residents with a disclosure statement outlining rent and purchase options before any lease agreement entered, noting also that mandatory disclosure and cooling-off periods also apply. 	

[†]Prior to entering into any agreements, the approved form of Site Agreement (set by legislation) clearly shows if a DRF will or will not apply and the basis on which this is to be completed. Many WA operators offer a choice mechanism between a higher site rental rate, or a lower site rental rate coupled with a deferred portion to improve resident affordability.

Benefits

Housing Supply & Continuum

LLCs are growing in importance as part of the private housing market in the housing continuum.

There are currently over 900 LLCs in Australia, accommodating approximately 135,000^{1&2} residents. While the market is much less developed in WA than the eastern states, there several current and imminent operators:

- Serenitas/National Lifestyle Villages
- Providence Lifestyle Resorts
- Edenlife Communities
- Aspen Lifestyle Villages
- Stockland Halcyon
- Yolk Property Group

These operators have 3,797 households living in their communities currently, with an additional 1,217 approved homes still to deliver in these existing LLCs. They also have 20 LLC projects in

their pipeline totalling \$3,162bn, which would provide an additional 6,631 homes in the next 10 years (this includes two projects with DAs approved for 347 new homes and eight projects with DAs awaiting approval for 2,140 dwellings)³. Within the Caravan Park Sector across WA, there are also an additional 34,000 people living permanently in mixed use Park Home Park/ Caravan Parks⁴.

A wider rollout in WA will increase housing mobility and efficiency through providing an option for right-sizers to move into a home that suits their needs while freeing up larger family homes for those that require the space. Additionally, due to the nature of the housing being provided, LLCs could also be rolled out comparatively quickly compared to more traditional masterplanned communities meaning that with the right policy settings, this model provides a significant opportunity to respond to our housing supply challenges.

Demographics & Changing Need

Australia's population is ageing, with some of the longest life expectancies in the world, and WA largely reflects national trends. As the over 50's population continues to grow in the coming years, more housing choice is required to suit their needs.

The flexibility of LLCs opens opportunities to better respond to these changing demographic needs by providing safe and secure housing options for more vulnerable segments of WA's population. Many existing LLCs have been shown to strongly appeal to over 50s who are singles (particularly single females), empty nesters and recent divorcees. LLCs provide a balanced solution for those who wish to age in place whilst

releasing home equity and reducing home maintenance burdens associated with larger family homes

LLCs can respond to a location need of older residents, situating them in familiar suburbs and allowing residents to maintain existing social ties and build new connections. Shared facilities and activities at LLCs foster social engagement and increased levels of physical activity. This reduces the risk of social isolation and associated health issues. Further, LLCs as gated communities respond to a desire for both physical security and peace of mind for residents, particularly at an age where there is often an increased desire to travel.

Typical build times

LLC homes:
22 weeks for modular home (constructed off-site)
24-26 weeks for timber built home (constructed on-site)

Traditional detached single story homes:
45+ weeks for double brick

¹ Chadwick Property Valuers. (2024, September). Chadwick Land Lease Communities (LLC) Industry Report – September 2024. <https://www.chadwickpv.com.au/llc-industry-white-paper>

² Residential Land Lease Alliance. (2016, March). Submission to the Affordable Housing Working Group: Innovative Financing Models Issues Paper. The Treasury. https://treasury.gov.au/sites/default/files/2019-03/C2016-050_Residential_Land_Lease_Alliance.pdf

³ Based on data provided directly by the operators.

⁴ ABS (2021) and Caravan & Camping Western Australia.



Affordability

LLCs can provide an affordable option, in terms of the upfront purchase costs (two thirds of homes in LLCs are trading at 10–70% discount to homes in close proximity⁵), the ongoing costs and costs at resale. The private arrangements between residents and operators also allow flexibility for a range of financial positions.

Incoming residents are exempted from stamp duty, an often-prohibitive fee for older Australians discouraging rightsizing. Furthermore, upon re-sale of their LLC home, in most new land lease developments, the residents receive 100% of capital gains as a cash profit (subject to any agreed permitted fees charged by the Operator, as set out within the Site Agreement).

A resident's weekly costs typically cover year-round access to shared facilities, security, rates and taxes, rubbish removal and community maintenance. The affordability of the weekly rental costs (site lease) is underpinned by the Federal Government's CRA, which subsidises these costs for eligible occupants. This is a non-taxable allowance to help meet the cost of private rented accommodation. A fully self-funded lease is also available.

Government benefits

By following the east coast trend, there is significant potential for LLCs in WA to become a popular choice for affordable housing for a wider range of people and deliver benefits to Government.

They can be efficiently and effectively deployed to a range of potential sites that may not be able to be fully utilised due to the underlying land value. This provides greater ability for State and Local Government to respond to housing challenges in the short and long term.

Increasing the density of the ageing-in-place populations also facilitates government services to be made more efficient and is more cost-effective option than aged care. As such, the positioning of the LLC product is important to be recognised and supported by governments as a solution that provides advantages to all stakeholders involved regarding affordability and flexibility.

What will get this moving?

To enable the expansion of LLCs in Western Australia, where the market is much less developed than in the eastern states, several levers need to be pulled to embrace what the model has to offer in response to the housing supply and affordability crisis and demographic shifts that are being experienced.

It is imperative that:

- Both existing pathways (the *Caravan Parks and Camping Grounds Act 1995* and planning approvals under the *Residential Parks (Long-stay Tenants) Act 2006*) are retained to provide flexibility for operators to ensure timely delivery of diverse and affordable offerings for WA's ageing population.
- A clearer link from Legislation to Planning for both pathways is implemented:
 - ◊ In the case of the *Caravan Park and Camping Ground Act 1995* and a planning use 'Park Home Park':
 - i) clarity and support for home construction methods for a 'Park Home', and ii) refine definition of 'Park Home' to remove ambiguity for local governments and encourage industry investment.

- ◊ In the case of planning approvals (with consideration to the R-Codes) under the *Residential Parks (Long-stay Tenants) Act 2006*: greater clarity for planning use definitions via either a 'Residential Park' (new use), or confirmation and broader adoption of existing planning definitions for 'Independent Living Complex'.

- There is a consistent basis state-wide for the adoption of LLCs as a permissible land use, with a policy framework which facilitates wider roll-out.
- Any legislative or planning changes seek to increase consistency in how LLCs are dealt with by approval authorities, giving due consideration to the rights, responsibilities and protections of both residents and owner-operators, to reduce barriers and facilitate their roll out.
- Any legislative change at State level must not impact residents' eligibility for Commonwealth Rent Assistance (CRA), which is crucial for affordability.
- Any changes introduced ensure there are no unintended consequences to the existing legislative frameworks that supports residents already living in LLCs across the state.

LLC Best Practice Policy Settings and Recommendations

Whilst WA is well placed to support the LLC industry maturing, there are legislative and policy barriers and a review of the national best practice policy settings highlights opportunities to ensure WA leads the way in supporting

suitable housing for one of the fastest growing demographics. There are also opportunities to avoid some of the policy settings that have prevented good outcomes in other States.



⁵ CBRE Research. (2025, May). Intelligent Investment Land Lease Communities Report. Australian Senior Living 2025 Edition.



Focus Area	Best Practice	WA Overview
Land Supply	<ul style="list-style-type: none"> Strategic planning: LLC identified in planning strategies and housing plans as a critical housing type with supply targets and policy incentives Zoning: permissible in both land lease-specific and general residential zones. Early land release in known growth corridors – acknowledgement that due to the size of land required to deliver affordable scale 8 to 15 hectares retained under one ownership is easier to plan around if it is the first mover in a corridor. This allows for the orderly planning and taking advantage of natural boundaries that may exist in major road infrastructure or natural environmental boundaries. 	<ul style="list-style-type: none"> No overarching planning specific to LLCs – treated on a ‘project by project’ basis. State Government Position Statement acknowledges Independent Living Complex (suitable to LLCs but LLC not specifically noted) but it is not currently reflected within many LPS.
Planning Approvals	<ul style="list-style-type: none"> Planning controls: state-wide consistent design controls and standards; state-wide guidance and education on assessing and approving LLC. Pathways and approvals: fast track approvals for complying designed developments; centralised/expert assessing officers. 	<ul style="list-style-type: none"> LLCs are usually single story detached dwellings, with supporting communal facilities. As a low scale proposal pathway, allowing high levels of self-certification is encouraged.
Building & Certification	<ul style="list-style-type: none"> Building/engineering approvals: minimal regulation of manufacturing/installation process; regulators permit self-certification of installation and occupation. 	<ul style="list-style-type: none"> It is essential to ensure suitable, broad definitions of dwelling construction are available. Specific requirements on built outcomes prevent innovation and ability to provide LLCs. LLCs are currently more innovative in construction method (modular, timber frame options, etc) than the traditional double brick WA market. Suitable policy is required to support construction diversification and it should remain non-prescriptive.
Operational	<ul style="list-style-type: none"> Rent reviews: each operator has a differing method of attracting its target audience. Flexibility and market competitiveness should prevail, rather than prescriptive methods providing appropriate disclosures are provided to the market. Tax: land tax exemptions maintained; exemptions from council rates. Duties: homeowners do not pay stamp duty. Utilities: Options to allow authority owned, and privately-owned, metered and billed inside the gates. Income support: full access for residents to Commonwealth Rent Assistance. 	<ul style="list-style-type: none"> Market rent reviews prohibited – which can go against affordability given operators need to adjust to operational costs over time. It is essential to ensure taxation settings do not impact LLC operators or homeowners. Operators are required to run embedded networks (private networks) to service owners. There would be greater protection and more efficiency if services by authorities are provided direct to homes (as per subdivision) as an option to operators. It is essential to ensure no impact on CRA settings.

Pathway Specific Recommendations

Park Home Park

A significant barrier for Park Home Parks is the definition of a “park home” as set out in the *Caravan Parks and Camping Grounds Act 1995*, as park home means “a vehicle of a prescribed class or description that is fitted or designed for habitation”.

In *Henville v City of Armadale* [2018] WASAT 108, the State Administrative Tribunal determined that while the regulations to the Act prescribe a park home as being a caravan in respect of which a vehicle licence is not required under the *Road Traffic (Vehicles) Act 2012* section 4, because it could not be drawn on a road due to its size, a park home must satisfy all other requirements under the *Road Traffic (Vehicles) Act 2012* (other than size).

This decision is inconsistent with prior industry understanding of what constituted a “park home” and has created uncertainty for all present owners of park homes, for operators wanting to introduce new park homes on sites, as well as for local governments.

It is recommended that the following be implemented:

- An amendment to the *Caravan Parks and Camping Grounds Act 1995*, amending the definition of a park home to “park home means a transportable home of a prescribed class or description that is fitted or designed for habitation.” This would mean that park homes could continue to be brought into existing LLC villages and operators could ensure high quality housing solutions, rather than caravans with tyres and annexes as their only park home option. An additional amendment to the Act should read 4(1A): “A relocatable home which is not a vehicle, is a relocatable home of a prescribed class or description for the purposes of the definition of ‘park home’ in section 5(1) of the Act.
- An exemption for LLCs that have a pre-DA for homes prior to *Henville v City of Armadale* (2018).



Residential Park

While a “Grouped Dwelling” land use classification has provided a practical approach for approving LLCs in urban areas, the LLC housing typology differs from “Grouped Dwelling” and therefore cannot comply with the full suite of “Grouped Dwelling” R-Code requirements. Whilst a pragmatic approach from some local governments and decision makers has provided an opportunity for this approval pathway, it requires the exercise of discretion and does not provide consistency or certainty for the delivery of LLCs across the State. The land use classification of “Independent Living Complex” is ideally suited to LLCs however, given the relatively recent establishment of this land use within the WAPC’s position statement on “Residential accommodation for ageing persons” it does not yet appear in local planning schemes, nor does it specifically provide a direct and clear link between an Independent Living Complex and a ‘Residential Park’ (within the Act).

It is recommended that:

- The planning framework be amended to actively implement the WAPC’s “Residential accommodation for ageing persons” position statement (the Position Statement) by:
 - ◊ Including the Position Statement’s definition of ‘independent living complex’ within clause 1, ‘Terms used’ of the Planning and Development (Local Planning Schemes) Regulations 2015 ‘deemed provisions’.
 - ◊ Updating local government planning schemes to include the land use of ‘Independent Living Complex’ within the zoning table, specifying the use as permitted ‘P’ uses within the residential zone and discretionary ‘D’ uses within the rural (or equivalent) zone. These amendments should be progressed as ‘basic’ amendments under the Regulations given their consistency with the Position Statement.
- An initial letter from the Minister of Planning and Lands; Housing and Works; Health Infrastructure to local governments outlining this expectation may be appropriate to instigate this change.
- The Position Statement to be updated:
 - ◊ In line with the above, linking planning to legislation.
 - ◊ To provide guidance for the exercise of discretion in considering “independent living complexes” on rural zoned land in urban fringe areas i.e. access to service, amenities and infrastructure. This is in acknowledgement that not all rural locations should be capable of accommodating ‘independent living complexes’ but that there are many that can where suitably located and without having to rezone the land prior on a merit based approach.
 - ◊ To amend the reference for consideration of “relevant provisions of the R-Codes” when assessing development applications or independent living complexes to “the relevant provisions of the R-Codes acknowledging that an ‘independent living complex’ is not defined nor contemplated in the R-Codes. The R-Codes should therefore be used as guide rather than a rigid assessment tool”. This would facilitate pragmatic assessment in terms of what is ‘relevant’ in this context.
- There is a review of embedded network (energy) settings and in particular the exclusion of a daily supply charge for Residential Parks (Fact Sheet: on-selling of electricity, DEMIRS, October 2024), which is unclear in current drafting.

Endorsed by the
UDIA WA Land Lease Working Group





For the
*community
creators*



About UDIA WA

The Urban Development Institute of Australia WA (UDIA WA) is the leading membership organisation representing the urban development industry in Western Australia. We represent member organisations across the entire housing supply chain, from both the private and public sector, and we have been representing industry in WA for over 50 years.

We inform and engage government and industry, enabling better policy and better business decisions aligned with our Purpose, Vision, and Mission.

Our Purpose

Great places + Housing choice = Better lives

Our Vision

Diverse living options in thriving, connected communities

Our Mission

Lead, influence and deliver remarkable member value for a strong urban development industry

UDIA WA

Unit 26, Level 1
3 Wexford Street
SUBIACO WA 6008

T 08 9215 3400

E policy@udiawa.com.au

www.udiawa.com.au



UDIAWA



Urban Development Institute of Australia (WA)



udiawa