



PAN-COMMUNITY
COUNCIL
P.O. BOX 102,
NIMBIN 2480

1st Circulation

Draft

17.1.94

Regional Manager,
Mr. Trevor Prior,
Department of Planning,
P.O. Box 6, Grafton, NSW, 2460

Dear Trevor Prior,

Re: Multiple Occupancy Review

INTRODUCTION

We enclose herewith our comments on the proposed MO Survey Form along with suggestions of possible supplementary questions, and a bibliography of selected readings, see Attachments "A", "B", "C" and "D".

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We recommend that the whole basis on which the survey has been established, including the terms of reference of the brief, the absence of a staged contract and the manner of the appointment of the consultant, are such that these should be reexamined with a view to terminating the present contract and starting again.

We also draw to your attention the "Conclusions" in Attachment "A".

We list below details in support of our conclusions.

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Needless to say the issues of concern to him are of a social and personal nature and hence deserve consideration in any MO review.

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and b. That a **DEPARTMENTAL MANUAL** on MO Development be produced.

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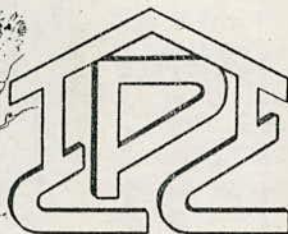
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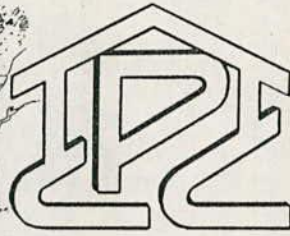
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(We would be happy to consider being engaged on a professional basis in assisting in preparing such a Manual. I would refer you in this regard to the "Low Cost Home Building Handbook" published by the Department some years ago, as a model in this regard. We view that the extensive sales of this publication, suggests the need for a companion publication addressing the issues of the day).

Pending our formal proposal to the Director we would appreciate it if you would note these propositions as a potential item for consideration in your next budget.

In a fresh approach to the MO surveys we suggest that consideration be given to:-

a. Including a specification which clearly gives the aim, objective or reasons, for each survey question.

We submit that it is necessary to establish something of this order as a base line in making an evaluation, and, for drawing conclusions.

b. Includes a structural process involving the MO community at all stages of the review.

c. Provides for the project to be staged (with evaluation applying at the end of each stage and subsequent stages not proceeding until the former stage is fully analysed and evaluated).

While we appreciate the courtesy extended to us by the Department and the consultant, nevertheless we feel very much as being an observer, of the process. We would prefer to feel that we were part of the process rather than being an observer.

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That we have not included at this time, any comment on the Council Survey Form should not be taken as an endorsement that we view this Survey Form as being appropriate and adequate.

As the Council Survey Form has set the pattern for questions in the MO Survey Form we are faced with a virtual fait accompli.

We submit with respect, that the inadequacies and weaknesses in the survey forms are such that any review based on this data must be considered as being seriously compromised.

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We are given to understand that no synthesis or conclusions are made in the Draft Report by the consultants and that the Report amounts to little more than a statistical compilation. Are we to understand from this, that it will be the Department who will be drawing conclusions after testing for the reliability and appropriateness of the replies given by councils?

That the consultants are endeavouring to do the best they can within their budget is no excuse. The fundamental problem stemming it seems, from an appointing a consultant experienced in MO development.

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Our motivation in suggesting that additional questions be considered (such as detailed in Attachments "B", "C", and "D"), is in part, that the survey should have the widest possible use (eg. by councils, and community groups).

In addition many, if not all such questions are now to be addressed in the annual SOE Report and hence your survey has the potential to assist others in this regard, for example those councils who are unlikely to conduct their own MO surveys.

CONCLUSIONS

The draft MO Survey Form contains inadequate and inappropriate questions.

We recommend that the whole basis on which the survey has been established, including the terms of reference of the brief, the absence of

a staged contract and the manner of the appointment of the consultant, are such that these should be reexamined.

We note that many of the questions in the proposed MO Survey follow those in the Council Survey. It is in our view, a sad reflection on the Department in not having addressed these adequately at the time of approving the Council Survey Form.

As it is our wish to continue to work constructively with the Department we seek that serious attention be directed to the above matters, as a matter of urgency and in particular that consideration be given to the Department cutting its losses and beginning again.

Failing this we ask that consideration be given to reviewing the time schedule of the present brief, by deferring the present target of having the MO Survey circulated in the first week of February, to give sufficient time to address the suggestions and comments made herein.

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For your information we have forwarded a copy of Attachments "A", "B", "C", and "D" to the consultant. As the Lismore Council is planning to conduct their own survey of MO's in their area, we will be sending them a copy of the enclosed material.

Thanking you in anticipation. We await your reply.

Yours faithfully,

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PAN-COMMUNITY
COUNCIL
P.O. BOX 102,
NIMBIN 2480

17.1.94

Regional Manager,
Mr. Trevor Prior,
Department of Planning,
P.O. Box 6, Grafton, NSW, 2460

Dear Trevor Prior,

Re: Multiple Occupancy Review

INTRODUCTION

We enclose herewith our comments on the proposed MO Survey Form along with suggestions of possible supplementary questions, and a bibliography of selected readings, see Attachments "A", "B", "C" and "D".

In short we consider that the MO Survey Form is deficient in not providing a rigorous and appropriate set of questions.

We are also of the view that these deficiency stems in part, from the paucity of knowledge that the consultants have of the MO form of development.

We recommend that the whole basis on which the survey has been established, including the terms of reference of the brief, the absence of a staged contract and the manner of the appointment of the consultant, are such that these should be reexamined with a view to terminating the present contract and starting again.

We also draw to your attention the "Conclusions" in Attachment "A".

We list below details in support of our conclusions.

MO SURVEY FORM

For our comments on the Draft MO Survey Form, see Attachment "B".

BILL RIXON M.P.

We are engaged in discussions with Bill Rixon M.P. in regard to this review. These discussions have extended to taking him on a conducted tour on an MO as he had not previously experienced this form of development at first hand.

As he was instrumental it seems, in triggering this review, we have noted those values and beliefs that were uppermost in his mind in raising the issue with the Minister.

Needless to say the issues of concern to him are of a social and personal nature and hence deserve consideration in any MO review.

As the draft MO Survey in its present form, does not address all such issues, should we conclude that they will not be dealt with in the final Report by the Department?

PROCESS

We have long supported and commended the Department for the manner, thoroughness and thoughtfulness with which the Department prepared the Policy.

As you are aware, we have gone out of our way to make ourselves available to assist both the consultants and the Department in this Review. Many have devoted a deal of time, energy and money in this regard.

If the Minister comes to make a decision which erodes the Policy in any way we would be asking the question whether on not the basis for making such a decision was in whole or part, based on questions and issues which were not adequately addressed or even flagged in the Department's review.

While these conclusions may appear to be critical they are conveyed in the spirit of being "constructively critical".

We do not see this as a polarised situation, but rather one where "we jointly" have a problem to be addressed.

We see the lack of experience by staff (at both the departmental and council levels) of the MO form of development, as probably being the root cause of the condition underlying the present predicament, and, we see an appropriate educational programme as being the answer to this problem.

We accept some responsibility in this regard.

We appreciate that there has been a major turnover of staff since the Policy was introduced and that your new staff have not had the opportunity of a refresher course and little if any field experience, in this form of development.

To this end we suggest the following two educational components for your consideration.

a. THAT A CERTIFIED COURSE ON MO BE ESTABLISHED

We have taken steps to explore the possibility of there being established a special course on MO administration at the Lismore TAFE College. Our investigations to date look promising.

In essence we see that this would be an annual course tailored to meet the needs of professional planners, from the Department (on a state basis), from local councils, consultants, and those bureaucrats from the many Governments that are now consulted in connection with new MO D.A's.

The course to include the history and philosophy of MO's, a review of all relevant legislation that bears on MO (ie. not just planning law). The course would include practical work, involving tours of inspection and a residential component on one or more MO's on a billet basis.

Those successfully completing the course to be awarded an appropriate certificate of proficiency in MO planning, monitoring and administration.

We would look to your Department funding or underwriting such a course. We will be in touch with you at a latter date in this regard. At the appropriate stage we would look to the Department becoming a "partner" in the design aspects of the course material to be included.

and b. That a DEPARTMENTAL MANUAL on MO Development be produced.

Such a Manual being designed to familiarise;

(i) new staff (departmental and council etc), on the nature of MO development, criteria for evaluation, monitoring of D.A's, SOE reporting and the like,

and (ii) new MO applicants in what is expected of them in preparing an MO D.A. and assistance in how to achieve this.

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Yours faithfully,

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A CRITIQUE

SURVEY QUESTION

1. "appropriate" presumably means "approximate"!!
2. These are inappropriate categories. It would be a laughing matter, if it wasn't sad!!

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The inference that somehow MO is a de facto "rural residential" development in planning terms, is entirely out of place and confusing to the public. The use of this term is not justified in this Survey notwithstanding its use in the consultant's brief.

3. Isn't this question simply a total of the data sought in Q4 and if so why can't it be obtained by summing the data in Q4?
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6. The question should make clear that "dwelling" do not include any separate units in an "expanded dwelling", if this is the intention.
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9. These are laughable options. Such options trivialise the MO experience. A relevant question would be one that related to the "move-in-stage". Appropriate periods are more of the order, <5, 5-10, 10-15, lifetime.
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How can one be "employed full time" on "unpaid housework"?

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The pension age for women is 60 not 65. Why is this not recognised?

11. As one individual may qualify equally for two or more of these categories, care will need to be taken as to the conclusions drawn from these results.
12. Is this before or after tax? ie gross or nett income?
13. Averaging this data will reduce it to a meaningless statistic. There seems to be no appreciation of the distinction between "resident members" and "visitors" or the concept that for many the lifestyle is a lifelong commitment! Why then stop at 10 years?
16. The question does not make clear whether the facilities have on some occasion been used by others, or if such facilities are used on an ongoing basis. If the question was phrased "Have any of these facilities been used by other than the MO residents?", the answer could be quite different.
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- 18-19. For whose benefit is this question? Is there evidence that an MO developer has been refused development because of this provision? No such case is known. Bob Smith (Dept of Ag.) has stated that he sees a case that perhaps MO's have a place in providing a long term stable labour force to work prime agricultural land. This we suggest is a realistic potential, at least in theory.

The process for determining what constitutes "prime crop and pasture land" is spelt out in the Policy. It will be appreciated on close reading that the use of Class I, II and III Ag. land is NOT necessarily the only way to define "prime crop and pasture" land. The present policy has well served the objective to protect prime ag. land while enabling MO dwellings provided they are not on "prime crop and pasture" land.
20. It is unlikely that a public company will ever be an attractive form of MO ownership. This is a poor set of options. Why not simply leave to "specify"?
21. What is the difference between option (b) and (c)? Should not the word "individual" be deleted from the question to make sense of the options?
- 22-23-24. Q22 implies that an MO may be managed by a NON COMMUNITY organisation. What such organisation is being alluded too? Why is it not stated as such, to make it clear what is in mind?
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32. SEPP-15 and s.90 require details of community and land management plans. Is it to be inferred that there are some who are exempt from supplying such data?

A perusal of the MO DA's held by the DOP should provide the answer to this question. Is it to be assumed that no such examination of these DA's has taken place?

The question indicates an ignorance of the quality of many DA's, many of which are now prepared by professional consultants.

33. A preparatory question ought to test if indeed houses are individually "owned". It is an assumption to assume otherwise!

What % of dwellings have changed ownership would be a more interesting and useful question. A variation would be "How many times has a dwelling changed hands?"

34. To imply that all the given options are a "problem" is a loaded situation. Is it implied that other forms of development "do not find these to be a problem"? Such options are a "concern", as may be experienced by a farm development, rural residential development, or for that matter, an urban development!

- 35-36. If the options given were identified as of "concern" at the DA stage, why would they not remain a "concern", following DA approval?

Consideration of "land capability" is an important theme but how is a questioner to know what definition is being used by the questioner?

37. The question is poorly worded as it may be read as to imply that each and every sub aim of the Policy must be met. This of course is not the case, as meeting just one aim is sufficient to qualify for consideration.

The preamble to the question should explicitly convey that the Policy does not require all aims to be met.

The terms "Not successful" and "Very successful" could better be replaced with "Not relevant" and "Very relevant".

We are adamant that the wording of this question should leave no possible room for ambiguity that the several aims, should be read as cojoined.

38. This surely implies that there may be some MO communities which do not meet the objectives of SEPP-15. If this is the case, the question may be asked

(a) Why was the DA approved in the first instance?

(b) If the situation has changed since the DA approval, then "Why do they retain their MO status"?, and,

(c) "Why should council not present them with a 'show cause' why they are not in breach of the approved DA?". If the reply is considered unsatisfactory, then appropriate action could be taken to address the situation.

39. This is probably the best question in the survey form. It is a good model for other questions! See Pan-Com checklist of questions, and our abstracts from the EPA State of the Environment Reporting Guidelines, for other questions that might be considered for inclusion. (See in particular Attachments "B" and "C").
40. Does "increased demand" mean that which flows from any new development (as all developments have some increased demand on the council), or does it mean the "increase" over and above that by a new farm development, or a new rural residential estate? The question should be clear and unambiguous, or otherwise deleted from the survey.

"Limitations" is surely not the appropriate word in this context. Does it mean "disadvantages"? Contrast this with "advantages" in the previous question!

What for example is the connection between "limitations" and "non payment of rates"? How is "non payment of rates" a planning issue under SEPP-15?

- 44-45. Normally there will be four adjoining land owners, and there can be up to eight "neighbours" depending on the grid pattern, as one corner peg may be common to three neighbours. How can this be adequately addressed in one choice? Theoretically all four options could apply!

- 48-49. This is an inappropriate question lifted without, it appears, any critical examination of its origin, or justification of its use in this survey.

The spirit of "community" as a living situation, is clearly based on a shared lifestyle, and this principle is firmly and clearly enunciated in the Policy.

In addition, the drafters of the Policy were anxious to avoid any loop-hole, in which the Policy might be used by developers to create de facto subdivisions.

Residential planning legislation is almost exclusively aimed at providing private ownership of land occupied by a nuclear family.

So great is value placed on personal land ownership it seems, that it now attempts to pervade the SEPP-15 Policy. This Policy is we suggest, one which in part, aims to provide a "housing diversity" and an opportunity for a different lifestyle in the context of our multi cultural fabric.

Rural residential development using standard subdivision, strata title or community title, provides perfectly valid options for those who want private title in a clustered form of development.

To those who have bought into an MO and now claim that they should be allowed to subdivide, we would contend that they bought into the MO knowing full well that subdivision was not permissible.

We sympathise with those who have difficulty in not being able to obtain finance for housing because the lending institutions require a mortgage document over an exclusive parcel of land.

The problem is not with the planning policy, but the policy of the financial institutions. Governments have so far failed to successfully address this issue and as a result MO residents may be considered as being "financially disadvantaged" in choosing this form of property, housing and lifestyle.

As we have said, this issue is not a planning matter but a financial management matter, and as such should be deleted from this survey.

50-51-52. The question is a non sequitur.

For those who seek a communal lifestyle, using standard subdivision, strata or community title, should submit a DA for same and an application for rezoning. This option is available now!

In the light of this, what possible justification is there to erode the SEPP-15 Policy that has successfully stood the test of time?

This is not an either-or situation. Let communities who want to operate under the SEPP Policy consolidate and flourish, and let those who want to use standard subdivision, strata or community title, argue their own case for settlement of rural land.

The evidence suggest that part of the push to consider permitting subdivision on MO's came from the Real Estate interests apparently in the expectation that there would be more sales passing through their books and hence more profit.

This is not a justifiable ground for modifying a good planning policy.

In addition, such a move has the potential to "open the flood gates" to rampant de facto subdivision.

Such a potential force could have a profound effect on other regional policies attempting to put in place an appropriate planning strategy for the sustainable development of rural land.

Such policy discussion includes the "Alternative Forms of Rural Residential Development" and "Cost of Rural Housing" consultancy briefs currently being funded by the DOP.

There is no place for this question in this survey. It should be deleted from the survey.

FINAL REQUEST (unnumbered)

No statement has been made in the preamble to the Survey, on the question of confidentiality or otherwise, in regard to the answers given in this Survey. This should be provided.

It would appear that there is no provision in the brief for individual follow-up on the Survey. If this is the case, what purpose is served in asking for the information?

That there may be members of the public who would like to obtain access to this data, on a case by case basis, for example for advertising or for an ulterior reason, should be considered.

On the grounds of confidentiality, privacy and limited, in any, relevance in needing to record community identity, this provision should be dropped.

To provide effective confidentiality in this regard, this should include the absence of any coded or numbered survey forms, which could permit tracing identity, even under FOI provisions.

A compromise might be considered acceptable in coding for the council area.

OTHER POSSIBLE QUESTIONS

What other questions would you like to have seen included in this Survey?

Comment: This could produce a series of questions which are experienced by community members as important and relevant issues in their daily activities.

In particular this may highlight other positive contributions that MO communities are making to the wider society, eg. not having to join the queue for a Housing Commission home!

For other questions that might be considered for inclusion see:

1. SOE "Checklist of Themes and Indicators relevant to MO", (Attachment "B").
2. Selection of questions and issues for consideration as raised by Pan-Com members (Attachment "C").
3. Selected bibliography of literature pertaining to other MO Surveys and issues (Attachment "D").

SUMMARY

The proposed survey questions have been closely examined, questions asked and constructive suggestions made with reasons, for their retention, amendment or deletion.

CONCLUSIONS

There are from our point of view, considerable shortcomings in the this draft.

All questions should be designed so that they can be evaluated in relationship to the statistics applicable to other rural development and the urban counterpart.

End

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SUMMARY

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End

DRAFT M.O. RESIDENT SURVEY

A CRITIQUE

SURVEY QUESTION

1. "appropriate" presumably means "approximate"!!
2. These are inappropriate categories. It would be a laughing matter, if it wasn't sad!!

The use of the term "rural residential" is misleading in view of this term being defined to have a specific meaning in various planning instruments. It is a poor choice of words and in poor taste. Why not use for example "communal lifestyle"!

The inference that somehow MO is a de facto "rural residential" development in planning terms, is entirely out of place and confusing to the public. The use of this term is not justified in this Survey notwithstanding its use in the consultant's brief.
3. Isn't this question simply a total of the data sought in Q4 and if so why can't it be obtained by summing the data in Q4?
4. What useful conclusions or evaluation can be drawn by knowing the differences between those in such detailed subdivision?
This level of breakdown would appear to be meaningless and pointless in this survey, notwithstanding that it might have been used in other surveys.
5. What does "separate family/household units" mean? What relationship does this term have with an "expanded house" if any?
6. The question should make clear that "dwelling" do not include any separate units in an "expanded dwelling", if this is the intention.
7. What constitutes "dispersed" or "clustered" will vary with the individual. Whether a plan is dispersed or clustered will in part, relate to the land characteristics, and the area of the land used, as the point of reference!! Given this what meaningful conclusions can be deduced from the responses to this question?
8. We find the classification given in this question to be inappropriate. Notwithstanding the data sought in Q6, why are "dwelling houses" not recognised as valid structures on an MO? If a "communal house" is valid then why not a "dwelling house"?
9. These are laughable options. Such options trivialise the MO experience. A relevant question would be one that related to the "move-in-stage". Appropriate periods are more of the order, <5, 5-10, 10-15, lifetime.
10. As the term "employed" is likely to be taken to indicate "paid employment", to imply that those children on an MO could or should, be working (on a full time employment basis) at age 15, is a discriminatory assumption.

To suggest that people are employed on a full time basis in "parent/child raising" is a fanciful idea.

How can one be "employed full time" on "unpaid housework"?

What is the basis for assuming there is a goal of "self sufficiency"?

The pension age for women is 60 not 65. Why is this not recognised?

11. As one individual may qualify equally for two or more of these categories, care will need to be taken as to the conclusions drawn from these results.
12. Is this before or after tax? ie gross or nett income?
13. Averaging this data will reduce it to a meaningless statistic. There seems to be no appreciation of the distinction between "resident members" and "visitors" or the concept that for many the lifestyle is a lifelong commitment! Why then stop at 10 years?
16. The question does not make clear whether the facilities have on some occasion been used by others, or if such facilities are used on an ongoing basis. If the question was phrased "Have any of these facilities been used by other than the MO residents?", the answer could be quite different.
17. As there is no question 6.1, presumably reference is intended to Q15, and if so, is it reasonable to expect questionees to respond to this?
- 18-19. For whose benefit is this question? Is there evidence that an MO developer has been refused development because of this provision? No such case is known. Bob Smith (Dept of Ag.) has stated that he sees a case that perhaps MO's have a place in providing a long term stable labour force to work prime agricultural land. This we suggest is a realistic potential, at least in theory.

The process for determining what constitutes "prime crop and pasture land" is spelt out in the Policy. It will be appreciated on close reading that the use of Class I, II and III Ag. land is NOT necessarily the only way to define "prime crop and pasture" land. The present policy has well served the objective to protect prime ag. land while enabling MO dwellings provided they are not on "prime crop and pasture" land.
20. It is unlikely that a public company will ever be an attractive form of MO ownership. This is a poor set of options. Why not simply leave to "specify"?
21. What is the difference between option (b) and (c)? Should not the word "individual" be deleted from the question to make sense of the options?
- 22-23-24. Q22 implies that an MO may be managed by a NON COMMUNITY organisation. What such organisation is being alluded too? Why is it not stated as such, to make it clear what is in mind?
- 27-28. Why not include other realistic options?

29. Having a separate category for "Bank/commercial loan" finance is probably inappropriate unless it is put in the context of a review of banking and government financial policies generally.

- 30-31. What does "consultation" mean in this context? What do "plans and study" mean in the context of "maintained for the MO"? Is oral documentation acceptable and if not, why not?

32. SEPP-15 and s.90 require details of community and land management plans. Is it to be inferred that there are some who are exempt from supplying such data?

A perusal of the MO DA's held by the DOP should provide the answer to this question. Is it to be assumed that no such examination of these DA's has taken place?

The question indicates an ignorance of the quality of many DA's, many of which are now prepared by professional consultants.

33. A preparatory question ought to test if indeed houses are individually "owned". It is an assumption to assume otherwise!

What % of dwellings have changed ownership would be a more interesting and useful question. A variation would be "How many times has a dwelling changed hands?"

34. To imply that all the given options are a "problem" is a loaded situation. Is it implied that other forms of development "do not find these to be a problem"? Such options are a "concern", as may be experienced by a farm development, rural residential development, or for that matter, an urban development!

- 35-36. If the options given were identified as of "concern" at the DA stage, why would they not remain a "concern", following DA approval?

Consideration of "land capability" is an important theme but how is a questioner to know what definition is being used by the questioner?

37. The question is poorly worded as it may be read as to imply that each and every sub aim of the Policy must be met. This of course is not the case, as meeting just one aim is sufficient to qualify for consideration.

The preamble to the question should explicitly convey that the Policy does not require all aims to be met.

The terms "Not successful" and "Very successful" could better be replaced with "Not relevant" and "Very relevant".

We are adamant that the wording of this question should leave no possible room for ambiguity that the several aims, should be read as cojoined.

38. This surely implies that there may be some MO communities which do not meet the objectives of SEPP-15. If this is the case, the question may be asked

(a) Why was the DA approved in the first instance?

(b) If the situation has changed since the DA approval, then "Why do they retain their MO status?", and,

(c) "Why should council not present them with a 'show cause' why they are not in breach of the approved DA?". If the reply is considered unsatisfactory, then appropriate action could be taken to address the situation.

39. This is probably the best question in the survey form. It is a good model for other questions! See Pan-Com checklist of questions, and our abstracts from the EPA State of the Environment Reporting Guidelines, for other questions that might be considered for inclusion. (See in particular Attachments "B" and "C").
40. Does "increased demand" mean that which flows from any new development (as all developments have some increased demand on the council), or does it mean the "increase" over and above that by a new farm development, or a new rural residential estate? The question should be clear and unambiguous, or otherwise deleted from the survey.

"Limitations" is surely not the appropriate word in this context. Does it mean "disadvantages"? Contrast this with "advantages" in the previous question!

What for example is the connection between "limitations" and "non payment of rates"? How is "non payment of rates" a planning issue under SEPP-15?

- 44-45. Normally there will be four adjoining land owners, and there can be up to eight "neighbours" depending on the grid pattern, as one corner peg may be common to three neighbours. How can this be adequately addressed in one choice? Theoretically all four options could apply!

- 48-49. This is an inappropriate question lifted without, it appears, any critical examination of its origin, or justification of its use in this survey.

The spirit of "community" as a living situation, is clearly based on a shared lifestyle, and this principle is firmly and clearly enunciated in the Policy.

In addition, the drafters of the Policy were anxious to avoid any loop-hole, in which the Policy might be used by developers to create de facto subdivisions.

Residential planning legislation is almost exclusively aimed at providing private ownership of land occupied by a nuclear family.

So great is value placed on personal land ownership it seems, that it now attempts to pervade the SEPP-15 Policy. This Policy is we suggest, one which in part, aims to provide a "housing diversity" and an opportunity for a different lifestyle in the context of our multi cultural fabric.

Rural residential development using standard subdivision, strata title or community title, provides perfectly valid options for those who want private title in a clustered form of development.

To those who have bought into an MO and now claim that they should be allowed to subdivide, we would contend that they bought into the MO knowing full well that subdivision was not permissible.

We sympathise with those who have difficulty in not being able to obtain finance for housing because the lending institutions require a mortgage document over an exclusive parcel of land.

The problem is not with the planning policy, but the policy of the financial institutions. Governments have so far failed to successfully address this issue and as a result MO residents may be considered as being "financially disadvantaged" in choosing this form of property, housing and lifestyle.

As we have said, this issue is not a planning matter but a financial management matter, and as such should be deleted from this survey.

50-51-52. The question is a non sequitur.

For those who seek a communal lifestyle, using standard subdivision, strata or community title, should submit a DA for same and an application for rezoning. This option is available now!

In the light of this, what possible justification is there to erode the SEPP-15 Policy that has successfully stood the test of time?

This is not an either-or situation. Let communities who want to operate under the SEPP Policy consolidate and flourish, and let those who want to use standard subdivision, strata or community title, argue their own case for settlement of rural land.

The evidence suggest that part of the push to consider permitting subdivision on MO's came from the Real Estate interests apparently in the expectation that there would be more sales passing through their books and hence more profit.

This is not a justifiable ground for modifying a good planning policy.

In addition, such a move has the potential to "open the flood gates" to rampant de facto subdivision.

Such a potential force could have a profound effect on other regional policies attempting to put in place an appropriate planning strategy for the sustainable development of rural land.

Such policy discussion includes the "Alternative Forms of Rural Residential Development" and "Cost of Rural Housing" consultancy briefs currently being funded by the DOP.

There is no place for this question in this survey. It should be deleted from the survey.

FINAL REQUEST (unnumbered)

No statement has been made in the preamble to the Survey, on the question of confidentiality or otherwise, in regard to the answers given in this Survey. This should be provided.

It would appear that there is no provision in the brief for individual follow-up on the Survey. If this is the case, what purpose is served in asking for the information?

That there may be members of the public who would like to obtain access to this data, on a case by case basis, for example for advertising or for an ulterior reason, should be considered.

On the grounds of confidentiality, privacy and limited, in any, relevance in needing to record community identity, this provision should be dropped.

To provide effective confidentiality in this regard, this should include the absence of any coded or numbered survey forms, which could permit tracing identity, even under FOI provisions.

A compromise might be considered acceptable in coding for the council area.

OTHER POSSIBLE QUESTIONS

What other questions would you like to have seen included in this Survey?

Comment: This could produce a series of questions which are experienced by community members as important and relevant issues in their daily activities.

In particular this may highlight other positive contributions that MO communities are making to the wider society, eg. not having to join the queue for a Housing Commission home!

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