



BELLINGEN MULTIPLE OCCUPANCY ACTION GROUP



7th February '94

Please address reply

C/- 3, Casuarina Ave

Bellingen, 2454

Ms Leigh Knight
Department of Planning, Grafton

Dear Leigh

Re: Multiple Occupancy Review.

Thank you for sending MOAG a copy of the updated draft of the survey of multiple occupancies. Overall this draft is a substantial improvement on the previous one.

Confirming our phone conversation of Friday (4/2/94), there are still a few questions which we believe need rewording for clarification:

19. As worded it implies "choose one of the following categories" which, we suspect, would give little data of value - depending on what the DoP is seeking

In this area the answer would be "single dwellings" As an example,
This would summarise for my own community 2 expanded dwellings
5 single
1 shed

Suggestion: that the numbers of each are requested, ie a continuation of Qn 18, or an indication of which types of dwellings exist on the MO

28. Ambiguous and difficult to answer since two types of capital are involved in setting up an MO :

a) purchase of the land - communal

b) establishing a dwelling - often individually financed

It is our experience that houses, not land, have had the problems with finance from institutions

49 -52.. need for further clarification

49 include "as part of the DA application" + Environmental study/statement ie indicating clearly that we are not talking about EIS s

50. include " as a condition of consent" - ie after/ part of approval, not part of the DA submitted

52. Council (Section 90(1) EPA) has to address all these issues, hence the answer (as the questions reads at present) would be "Yes" to all items

Clarify by adding something like "Were you asked to provide further information on any of the following issues before council would approve your DA"

NB this is different from " Were you asked to resolve any of the issues, ie do anything" (such as erosions works etc) before the DA was accepted

For put in plans as to how you proposed to deal with....)

With Thanks

Dorin Hart
Dorin Hart

PS Please register Chrysalis MO,
Bellingen, and send survey to
Sexton Bourke, Lot 75 Kalang Rd
Bellingen, 2454



BELLINGEN MULTIPLE OCCUPANCY ACTION GROUP



3 February '94

Please address reply

C/- 3, Casuarina AVE

Bellingen, 2454

Dear

Re: Multiple Occupancy Review

As you may, or may not, have heard, there is a review underway of SEPP 15, Multiple Occupancy. This is the state policy which we all, through MOAG and other MO organisations, played a strong part drawing up.

Those of us who are now "doing multiple occupancy" obviously have an important role in the review. The Department of Planning (DOP) informs us an ad will be placed in the Coffs Harbour Advocate and other appropriate rural papers. However MOAG is concerned that, living as many of us do off the beaten track, some MOs may miss the ad and as a result not have their say.

Enclosed therefore is a copy of the ad forwarded to us by DOP. → PTO

Ralf Martin and I have been keeping in touch with the DOP and the Pan Community Council on this matter. (Pan Com is nowadays the Lismore/ Nimbin/ Kyogle/ Byron equivalent of MOAG, but very much larger and more active, due to a far from friendly attitude there towards MOs by local and state government representatives.) There is strong evidence that the politics of the right would like to weaken, if not abolish, SEPP 15.

MOAG feels that it is extremely important at this point in time to strengthen and improve, if possible, SEPP 15. This would ensure existing MOs futures and allow for new generations of low cost communities to be established. While not perfect, the current SEPP 15 does represent some hardwon gains by us all after a decade of committed work and lobbying.

MOAG and Pan Com are concerned that, due to the way this review is being undertaken, councils and other statutory authorities may have more input than the MOs themselves. We ask you therefore to seriously consider making your views known. In addition to the survey the consultant, Purdon Associates, will be spending a day in Bellingin and each of the other shires listed in the ad. The times have yet to be announced. We feel it important that your group has a rep attend.

Your group, of course, may feel it does not want to participate in the MO review. However we strongly suggest that at least you ask the DOP for a survey form to be sent to you first, and then make your decision about taking part. Should you decide that parts of the survey are inappropriate we would encourage you to fill out at least those questions which relate to the SEPP itself. Apply by 11th February

Please contact Ralf (066) 551 117 or me (066) 551 721 if you need any more information.

Yours

Dorin Hart

Acting Secretary

PS. As it is some time since we had a meeting funds are low. \$10 contribution from your community would be appreciated to cover postage/photocopies & phone calls to Grafton DOP & Pan

Multiple Occupancy Review

The Department of Planning is currently reviewing the State-wide Policy applying to multiple occupancy development on rural lands. The review will assess the current adequacy and relevance of the provisions within State Environmental Planning Policy No. 15, which was introduced in June, 1988 specifically to provide guidelines for multiple occupancy development.

As the Policy has been in operation for over five years, the Department is assessing the extent of its use throughout the State and the impact of that use. As part of the review, six local government areas have been selected for closer study. Shoalhaven, Byron, Lismore, ~~Wollumbi~~, Kempsey and *Bellingen* local government areas are those chosen. *Kyogle*

The Department and its consultants are calling for input from local residents to assist with the review. A survey questionnaire has been prepared for completion by residents of multiple occupancy developments. Residents are urged to contact the Department, or its consultant, to register an address by Friday, 11 February to assist with distribution of the survey.

Landowners adjoining multiple occupancy developments as well as elsewhere in the local government area are also invited to make a submission. Written responses can be sent to:

Department of Planning
Northern Regions Office
PO Box 6
GRAFTON NSW 2460

To register an address for survey distribution, or to obtain further details, please contact:

Leigh Knight
Department of Planning
Northern Regions Office
(066) 420622

or
Brenton Dickins
Purdon Associates Pty.Ltd.
(06) 257 1511

PS MOAG

Since it is only usually unhappy neighbours who ever make submissions about anything, it might be good to encourage your friendly neighbours to put in a letter of support, however short!



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Bellinghen Multiple Occupancy Action Group

C/-3, Casuarina Avenue

Bellinghen

NSW 2454

19th January 1994

The Regional Manager
Mr Trevor Prior
Department of Planning
PO Box 6, Grafton
NSW 2460

Dear Mr Prior

RE: Multiple Occupancy Review - Draft MO Resident Survey

Further to my letter(FAX) of 17th January, I am writing on behalf of Bellinghen MOAG to express our concern over the Draft MO Resident Survey

To be effective, any review of MO needs to be based on accurate data which is as representative as possible of the various parties involved. In particular it needs to portray accurately the situation as it is now. Much of the detail needed for this can only come from those who are currently living on MOs. It is our belief, however, that if this survey goes ahead in its proposed form:

1. the response will be low - data will therefore be limited, plus biased towards those few who do reply
2. many of the results will be meaningless, due to the oversimplistic nature of many of the questions and the extreme subjectivity involved in the answers to others
3. Comparability of the data will be a problem, depending on who fills out the survey

Not only does the whole exercise demonstrate the lack of understanding and experience of MOs by the questionnaire designers, it also includes items of such a discriminatory nature as to seriously undermine the integrity of the Department of Planning.

Our reasoning is as follows:

(Please note the examples given are not exhaustive)

Low response

Given that responses to mail-out questionnaires are notoriously low (30% being regarded as excellent) there are additional features which would further depress the response to this particular survey.

a) No indication is given that the answers will remain confidential, and that no individual community will be identified in the results

This could lead to an outright refusal to participate in the survey or a particular section being omitted (eg Qn 12 Income).

MOAG

4/2/94

Relat - for your info.

sent to ^{all} 22 Bellingham MO's
+ 2 illegals
+ Bundagen (Colin Shino)

15 of 22 are old original MOAG members & are likely to
send for survey form

4 are newer, not part of MO machinations - all small
3 are unknown, ~~not yet with~~ DA lodged but in limbo - all small

your last ^{bi's} MOAG MEETING was 12.2.88 !!!
though most of us keep contact informally.

[Signature]

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b) Questions which are obviously discriminatory or show negative bias towards MOs would offend most serious MO members and deter them from taking part

(eg Qn 8 Dwelling Types does not even list "dwelling house" as a residential option!)

c) Questions which by their very wording demonstrate a lack of understanding by the survey designers of the survey of the processes involved in MO would again deter overall participation or leave to omission of such questions

(eg Qn 9 Time period for establishing dwellings)

(eg Qn 25 Decisions - the process depends very much on the type of decision - general policy or routine day-to-day operations)

2. Results will be meaningless

a) oversimplistic nature of questions

(eg Qns 30,31 Community Plans, Land Management Plans, Environmental Studies are all quite distinct documents. To lump them all together and ask whether they have all become mandatory rules or guidelines is totally inadequate. Some may become rules, others guidelines and yet others be purely informational)

(eg Qn 36 Concerns - it is surely essential to indicate to whom specifically these were of concern, not just ask why)

b) extreme subjectivity of answers

Much would depend on who answered the questions (see also 3. below) as well as how long an MO had been established.

Note: there is no clear question which establishes how long an MO has been in operation

(eg Qns 37 - 40)

c) Inadequate "forced choice" options will produce misleading/ inadequate information and bias in answers

(eg Qn 10 employment)

(eg Qn 25 Decisions)

(eg Qn 30 "Consultation" - what exactly does this mean?)

(eg Qn 23 Change of ownership - much depends on the age and size of MO)

3. Comparability of data

It is not made clear on this questionnaire who is to be the respondent - any "responsible adult"? - the elected management? - a community meeting?

Depending on the respondent there could be a wide variety in the responses to those questions where the answers are subjective. Our experience shows that within the same community such opinions could vary substantially.

In conclusion we view this draft questionnaire as being so biased that the possibility of accumulated information leading to completely erroneous conclusions is highly likely.

As a result, should this draft become the final version, we will be advising our membership not to complete such a questionnaire.

Yours faithfully

Acting Secretary

Ms D Hart

