

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

11.2.94

Attention: Nick Juradowitch,

General Manager,
Lismore City Council,
P.O. 23A, LISMORE,
2480

Dear Nick Juradowitch,

Re: Draft Development Control Plan - 20
Multiple Occupancy

We enclose herewith our comments and suggestions in respect to the above Draft DCP.

1. Our Council in general supports the Draft DCP. Particular issues have been specifically addressed.

The comments and suggestions made herein are the cumulative product of a number of our members who have closely examined the Draft DCP.

2. It is considered that a number of the items in the Draft DCP are applicable to residential development on rural lands generally, eg in rural residential estates (such as Gungas Rd., Modanville and Billen Cliffs); community title estates (which may become popular in rural areas) and detached dual occupancy.

This being the case, we view that consideration should be given to Council preparing a Draft DCP for rural lands generally. With this in mind we attach herewith a list of items which might be considered for removal from DCP-20 and placed in a DCP- Rural Land Generally.

In general we consider that nothing of an environmental nature should be included in DCP-20 which Council would not be at ease with, in applying equally to other forms of rural residential development.

As you may appreciate many of our members are very sensitive about this issue.

3. In the event of there being significant changes in the present Draft DCP we suggest that consideration be given to readvertising this before it is considered by Council, or failing this that we have an opportunity to see the amended draft when it is at an advanced stage.

It is likely of course that changes to DCP-20 will become necessary from time to time. One such occasion may be in connection with the introduction of a new regional policy flowing from the current DOP study on "Alternative Forms of Rural Residential Development".

4. In producing the Draft DCP we note it is Council's objective, to establish a set of "performance" and "management" standards, for this form of development. (Div. Manager Planning Services Report, p3. Meeting 14 Dec. 1993)

We support the principle of "performance" standards and believe DCP-20 would be strengthened by including a short introduction to each section stating the "objective" and "outcome" that the following standards are seeking to achieve.

This it is suggested may be particularly helpful in issues relating to "ownership" and testing to see that the prohibition of subdivision is not being subverted.


In regard to Council seeking documentation to assess the possibility of there being subdivision, it is probably worth keeping in mind that many applicants may be puzzled over the relevance of the documentation sought, unless the reason for doing so, is explained.

5. NOTES

- (a) The full text of the Council's Draft DCP is enclosed herewith with our proposed alterations, deletions and additions built into the text.
- (b) All the changes we have proposed are highlighted in bold type face and are underlined for ease in identifying.
- (c) Some composite headings have been separated for clarity. Where this has occurred, the existing item numbers have been retained. These will need to be renumbered in the final draft.

If there should be any need for clarification on our comments, please make contact.

Yours sincerely,


.....
Peter Hamilton
for Pan-Com M.O. Review Collective.

cc. Councillor Roberts

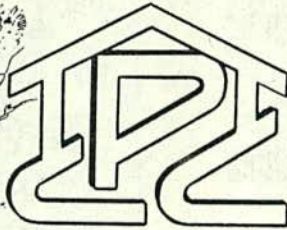
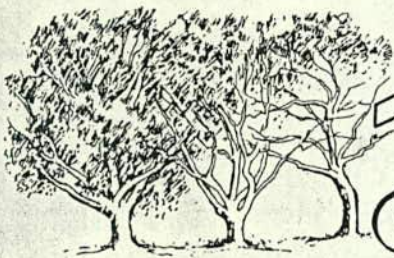
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ITEMS FOR CONSIDERATION AS POSSIBLY BEING COMMON
TO BOTH A GENERAL RURAL DCP AND DCP-20 MULTIPLE OCCUPANCY

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ITEM	
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3.11.4-5	Fire Refuge
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End



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

PAN COMMUNITY COUNCIL COMMENTS ON
LISMORE CITY COUNCIL
DRAFT DEVELOPMENT CONTROL PLAN NO. 20
MULTIPLE OCCUPANCY OF RURAL LANDS

11 February 1994

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DRAFT DEVELOPMENT CONTROL PLAN NO. 20 -
MULTIPLE OCCUPANCY OF RURAL LANDS

1.0 INTRODUCTION

1.1 Citation

This plan may be cited as Development Control Plan No. 20 - Multiple Occupancy of Rural Lands.

1.1.1 Acknowledgement

The assistance derived from the "Draft DCP for Multiple Occupancy" prepared by a member of the Rural Resettlement Task Force in 1987 and, the Bellingham Council MO DCP, in preparing this DCP, is acknowledged.

COMMENT: Provide acknowledgement. The wording in respect to the RRTF is specific as the Draft prepared at that time was not formally adopted by the RRTF, as Council chose not to proceed with the introduction of a DCP.

1.2 Aims and Objectives

1.2.1 To facilitate sustainable rural settlement in harmony with the environment through the multiple occupancy of rural land having a common purpose, aim or basis for being a land sharing group by:-

- a) Enabling people to erect multiple occupancy dwellings on a single allotment of land to be occupied as their principal place of residence, to share communal facilities and resources and to develop the land for communal purposes;
- b) Encouraging a community based and an environmentally sensitive approach to rural settlement;
- c) Facilitating development in a low cost manner which both protects the environment and does not create a demand for the unreasonable (deleted ... redundant) provision of public amenities or public services by Council or other public authorities;
- d) Enabling people (particularly those on low incomes) to pool their resources to develop low cost housing within a wide range of communal lifestyles (deleted ... preferred wording); and
- e) Assisting the proper management, development and conservation of natural and human resources, including agricultural land, natural areas, forests and waterways for the purpose of promoting the social and economic welfare of the community and a better environment.

- 1.2.2 a) To give guidance to intending applicants in the selection of suitable land, design of multiple occupancy developments, and in making of development applications for multiple occupancy development, and,
- b) To this end the Council will where possible make available written guidelines to facilitate this purpose.

1.3 Land To Which This Plan Applies

This plan applies to all the land zoned under the Lismore Local Environmental Plan 1992 as 1(a)(General Rural Zone), 1(b)(Agriculture Zone) and 1(r)(Riverlands Zone).

1.4 Commencement

1.4.1 This plan shall be effective from/....../1994.

1.4.2 Schedule 1 lists any amendments to this Development Control Plan.

1.5 Variations

- 1.5.1 This Plan may be varied only by a decision of Council and in a manner provided for in the Environmental Planning and Assessment Act 1979 and Regulation 1980.
- 1.5.2 Where Council is of the opinion that strict compliance with a specified numerical standard or requirement is unreasonable or unnecessary, it may permit such a variation notwithstanding the above clause. In all cases where a departure or variation is sought, all the appropriate aims (not ALL aims may be appropriate!) and objectives of the Plan must, in the opinion of Council, be met.

(LCC PAGE 4.)

1.6 Relationship to Other Planning Instruments

- 1.6.1 This Plan is to be read in conjunction with Lismore Local Environmental Plan 1992, The North Coast Regional Environmental Plan 1988 and State Environmental Planning Policy No. 15 - Multiple Occupancy of Rural Lands (the Policy).

COMMENT: Use "the Policy" hereafter in lieu of spelling out in full.

- 1.6.2 State Environmental Planning Policy No. 15 - Multiple Occupancy of Rural Lands is the principal planning instrument which enables multiple occupancy of rural land in the City of Lismore Local Government Area.

The purpose of this Development Control Plan is to provide specific direction and development controls for multiple occupancy development on rural lands in the City of Lismore Local Government Area and to assist in achieving the objectives of State Environmental Planning Policy No. 15 and the relevant objectives of the Lismore Local Environmental Plan 1992.

A Copy of State Environmental Planning Policy No. 15 is attached to this plan.

- 1.6.3 City of Lismore Local Environmental Plan 1992 contains two special provisions which relate to rural development.

These provisions are:

- a) Clause 17: Development on ridgelines in rural areas.
- b) Clause 33: Buffer zones to avoid potential (define "potential" and give examples, or use some other wording) land use conflicts.

- 1.6.4 (Delete line as redundant)

This Multiple Occupancy Development Control Plan applies to specific matters and should be read in conjunction with the following:

- a) Any applicable (delete) rural community services and facilities plan.
- b) Section 94 Contributions Plans for Rural Roads, Public Open Space, State Emergency Services and Bushfire Services.
- c) Development Control Plan No. 27 - 'Buffer Areas'.

1.7 Definitions

"Multiple occupancy" means the residential occupation in individual and/or expanded dwellings in a cluster or dispersed settlement pattern of rural land, owned in common, where three or more dwellings occupy one holding.

"Expanded dwelling" means one dwelling house developed under the following circumstances:

1. All habitable structures exist within an area equivalent to a circle of 60 metres diameter; (This allows for elongation, which is frequently appropriate in steep terrain).
2. Structures to be connected by all weather accessways; (Component parts of an "expanded" house on steep land, may be connected by steps).
3. (Deleted as ultra vires Cl. 7(1)(f) as amended);
4. Only one kitchen and laundry facility present;
5. There being an identifiable common (living) room to be so used;
6. All structures within the expanded house cluster require a building permit through a building application and compliance with the Building Code of Australia). A(t) the development application stage only a site layout with overall approximate dwelling dimensions are required.

COMMENT: (It is rare that building plans providing realistic dimensioned room sizes will be available at the DA stage).

(LCC PAGE 5.)

2.0 APPLICATION PROCESSES, INFORMATION REQUIREMENTS AND ASSESSMENT

2.1 Assessment: "Matters for Consideration"

The Council shall not consent to a development application for the carrying out of multiple occupancy development on rural land unless it has made an assessment of:

- a) "Matters for Consideration" as established in Section 90(1) of the Environmental Planning and Assessment Act 1979.
- b) "Matters for Council to consider" as established in Clause 8 of State Environmental Planning Policy No. 15.
- c) Requirements as established in this plan.

2.2 Information Requirements - How to Apply

- 2.2.1 Development applications for multiple occupancy development should be prepared by persons qualified and skilled in their respective fields. The name, address, appropriate qualification and experience are to be included with the appropriate report.

COMMENT: The key to this proposal is the word "should". Is this to be read to mean "must" or to mean that it may or may not, apply in

particular cases? Who is to determine when a DA is to be prepared by a "qualified" person ... a member of the Council staff or the applicant?

Council should have available a MODEL MO DA submission. This should be available free on request by prospective applicants. Such a "Model" might then be seen as the desired "base line" for a MO DA. (Such a "Model" could come to be part of a Council produced Manual on MO Development).

There should be no compulsory requirement or inference, that MO DA's are to be prepared by professional planners or the like.

It may be appropriate for Council to counsel an applicant on the wisdom of at least consulting qualified and skilled people in their respective fields.

Council always has of course, the option to seek additional information or even reject a DA on the ground of insufficient information. This it seems should provide sufficient motivation for an intending applicant to meet any standards Council may set in a "Model" DA.

CONCLUSION: This provisions should be deleted or reworded in the spirit of the above comments.

- 2.2.2 Applications for multiple occupancy development are to be made on the development application form obtainable from Council together with the prescribed fee and up to ten (10) copies of the following:

COMMENT: Why are 10 copies necessary? Is this a current requirement for all non MO DA's? Reduce this on cost grounds unless it can be shown that this number is essential in every case.

- a) a plan showing the complete holding; and
- b) a statement of environmental effect of the development.

2.2.3 Plans:

The plan is to be drawn to a scale of at least 1:5000 and preferably at 1:2000 with a maximum 10m contour interval and showing:

- a) Location, boundary dimensions, area of holding, north point and distance from the nearest centre of population;
- b) Existing forest and cleared areas, extent of weed infestation, water courses and dams;

COMMENT: It is recommended that a record of the type and extent of weeds on the property at the DA stage is important information;

- (a) for Council in respect to the preparation of SOE reports (see "SOE Reporting in Respect to MO Properties" attached, and
- (b) for community residents in respect to consideration of a management plan for its eradication or containment, if this should be applicable.

The documentation of the extent of any weed infestation at the time of settlement may also be useful if community members are subsequently accused by members of the public about the presence of weeds on the MO without being aware that extensive eradication may have taken place over a period of years.

Such a record would enable a community to receive credit for past eradication, despite the fact that total eradication may not yet have been achieved.

- c) Any land slips, potent(ial)ly unstable areas, floodprone areas;
- d) Location and uses of existing buildings and improvements;
- e) The proposed uses of the land, including areas for dwelling houses or expanded dwelling houses, other buildings, home gardens, agriculture, re-forestation, access tracks, water supply facilities, wildlife corridors, refuges or reserves and, any other special features such as stages of development.

COMMENT: Re "stages" of development, cross reference should be made to item 3.12.1 below where details should be provided on "In principle" consent (s.91AA), and "Staged development" (s.91AB).

Where possible, individual house sites should be shown;

- f) Any part of the land that is "prime crop and pasture land". "Prime crop and pasture land" means land identified as having an agricultural suitability of Class 1, Class 2 or Class 3 or land of merit for special agricultural uses;

COMMENT: Care needs to be taken in the wording and application of this provision of the Policy. It needs always to be appreciated that the classification of land for agricultural purposes into Classes 1, 2 and 3, has been made by the Department of Agriculture in terms of a "broad acre" approach to the use of such land.

The Department of Agriculture have acknowledged that the level of their mapping excludes pockets of land having characteristics different to that of the nominated Class.

This situation frequently prevails in the Lismore area, particularly in the foothills to the caldera.

The Director-General of Agriculture has the option under Cl. 5(1)(c) to certify that a particular patch of land is, or is not "prime crop and pasture land for the purposes of the Policy". (I am advised that this provision has already been used this way to enable an MO DA to proceed).

The term "prime crop and pasture land" should be used in quotations throughout the DCP to relate it back to the definition Cl.5(1) in the Policy.

CONCLUSION: That the Council satisfy itself on the availability of using Cl.5(1)(c) in this way and, note this option in the DCP.

- g) The location and source of any water supply, electricity, telephone and waste disposal systems for the dwellings; and

COMMENT: Cross references should be given for example, to item 3.10 below. Care needs to be taken not to give any impression that connection to the town supply of electricity and the telephone system is an obligatory requirement on an MO. (Such items are clearly optional under Cl.8(1)(g)).

CONCLUSION: While it is recognised that this item uses the word "any", it is recommended that this be strengthened to indicate that under the Policy, these items are optional.

- h) The proposed access from a public road to the area or areas in which the dwellings are to be situated.

(LCC PAGE 6.)

2.2.4 Statement of Environmental Effects

The report should be presented in a manner which addresses each of the relevant "matters of consideration" as described in 2.1 above. The following specific matters should also be addressed in the statement of environmental effects:

- a) A description of the proposed development, an indication of the anticipated number of persons and number of dwelling houses to be accommodated on the land, including, if applicable, the number of persons and dwelling houses at each stage of the development and the anticipated timing of such stages. (Council recognises the diverse evolutionary nature of multiple occupancy and recognises that precise figures and timing are not necessarily binding on the applicant);

INSERT NEW ITEM

- (a)(1) Add a new clause requiring details of proposed community process relating to:-
- # decision making (both major and minor issues such as determination of a policy on dogs, cats, firearms and excessive noise),
 - # internal conflict resolution (eg consideration of engaging an outside facilitator if necessary),
 - # external conflict resolution (eg with Council. In this regard attention in this DCP should be drawn to the mediation processes set out in the "Practice Directions" in the Land and Environment Court Act).
 - # community social bonding,
 - # manner of resolving difficulties with neighbours if this should arise,

- b) A description of the existing and/or proposed future ownership structure, and, community management structure, the objectives, and current owners of the holding;
- c) A plan of land use management including a statement of the objectives of the proposed multiple occupancy in relation to the use of the land.

Such a plan to take into account any guidelines or supplementary publications produced by the Council or other authorities.

The specific issues to be addressed in the management plan should include:

- * water supply management
- * waste management and effluent disposal
- * fire protection
- * erosion and sediment control
- * existing and future agricultural uses
- * noxious weed and animal control
- * fauna and flora () protection
- * internal access;

- d) Assessment of the effect on the environment of endangered fauna with regard to Section 4A of the Environmental Planning and Assessment Act.
- e) Consideration of the economic and social impact of the development in relation to the following services and facilities:
 - * education
 - * shops
 - * public halls, sports and recreation facilities
 - * bushfire services
 - * public transport
 - * impact on adjoining land use;
 - * social contribution if any, that the community may make to a relevant village and/or to the local community.
- f) Consideration of the visual impact of the development on the environment, landscape or scenic qualities of the locality.
- g) Documentation is required to demonstrate the origin and purpose of the development. (See also item 1.2.1 above). This should consider the nature and length of relationships and social and environmental aspirations of intending occupiers.

COMMENT: This comment applies generally and in particular to items (b) and (g) above.

The DCP should spell out in detail the provision regarding the prohibition of subdivision in the Policy and suggest typical documentation that might be provided so that Council can satisfy itself that there are no "separate legal rights to parts of the land through agreements, dealings, company shares, trusts or time sharing arrangements".

Details should be provided of typical documentation that might be provided respectively for each common form of land ownership, eg. Co., partnership, tenants-in-common, trust, coop.

In the absence of such documentation being supplied in the DA then the Council should consider sending out a "show cause why the Council should not consider the proposed ownership system may be in breach of the Policy". (See also comments in 3.1 below).

2.2.5 On-site Requirements

All dwelling sites are to be identified by a numbered peg/flag/stake, internal access routes are to be pegged at 20m intervals and the location of water sources identified.

An assessment of water supply flow rate quantity, drought reliability and quality is to be provided if the property is not to be connected to the town supply.

COMMENT: In cases where there is long grass, pegs are of little use for this purpose.

2.2.6 Additional Information

Council may, within 21 days of receipt of the application, require, in accordance with Clause 32 of the Environmental Planning and Assessment Regulation 1980, additional information considered necessary to properly assess the application.

(LCC PAGE 7.)

2.2.7 Advertising

All applications for approval of multiple occupancy shall be notified to adjoining owners and advertised at least once in a local newspaper.

This advises that the details of the application may be inspected at Council Offices for a period of 21 days, and within that period, submissions will be received in support of or in objection to proposals. Where an objection is made, reasons for the objection shall be set out in the submission.

COMMENT: The wording should indicate that this is a requirement under Cl.11 of the Policy, and not just a whim of the Council.

(This comment applies generally to the whole of the DCP, viz where applicable, reference to the relevant Clause should always be noted. This will have the double effect of, (a) assisting in familiarising an applicant with the implementation of the Policy requirements and, (b) indicating those items which have been generated by the Council).

The period of exhibition may extend to 40 days where a development proposes ten (10) dwelling sites or more.

COMMENT: An explanation should be given about Council's obligation to process a DA within 40 days (or possibly 60 days in certain circumstances) and failing this that a "deemed refusal" exists.

Comment should then be made on the process of negotiating an extended period of time.

2.2.8 Ownership and Responsibility

The communal management body, shall be nominated on the application form, and shall be responsible for all commitments and obligations to Council and shall receive, on behalf of all owners and tenants, notices issued by Council in respect of the multiple occupancy holding.

It is a requirement for the owner of the property to sign the DA Form.

3.0 DEVELOPMENT GUIDELINES AND MANAGEMENT

3.1 Area of Holding, Consolidation and Subdivision

The land subject of the application should be of an area environmentally capable of meeting the impact and demands of the development.

COMMENT: Where applicable reference should be made to the possible relevance of the Community Land Development Act 1988 and, the Community Land Management Act 1988.

3.1.1 The minimum area of a holding on which multiple occupancy may be approved shall be 10ha.

3.1.2 Any application for multiple occupancy on a holding consisting of more than one parcel, portion or like, shall, either (a) within 40 days of Council development consent, or (b) at the time of the first building application whichever is the longer, make application for consolidation of title, except where such consolidation is not possible.

COMMENT: Explain typical example where consolidation is not possible.

3.1.3 The future subdivision of any holding granted multiple occupancy status is prohibited.

3.1.4 (New item) Where an MO is being set up by an individual speculator, consortium or government agency, it is expected that the DA be staged. The first stage being an application by the developer and the second stage be an application by, or endorsed by, the "community management body".

3.2 Ownership.

3.2.1 The existing or proposed rules, articles of association, deeds of agreement or trust documents binding the communal management body, is to be included in the DA. (Section deleted).

COMMENT: "Ownership" and "Density" should be treated as two separate headings.

See comments under 2.2.4(g) and 2.2.8 above. (Cross reference should be made where a particular issue is dealt with in different places in the DCP).

The requirements dealing with "land owned in its entirety in common" and "the majority of residents having an ownership in the land" were dropped from the previous planning instrument when SEPP-15 was introduced.

We understand that this was deliberately done after much consideration and consultation on the grounds that it was impractical for a council to administer, and would in some cases, constitute an unnecessary and inappropriate hardship on the occupants.

All along a major concern has been to prevent the Policy being subverted by speculative developers. We strongly support this objective.

It is our considered opinion that speculative development can be prevented by the careful administration of the provisions in the existing Policy.

RECOMMENDATION: That the wording of this section be changed to give effect to these comments.

3.2.2 Density.

The density of residential accommodation should reflect the environmental capacity of the land and the social aspirations of the ownership group. The density of residential accommodation permissible within State Environmental Planning Policy 15, is set out in Cl.9.

COMMENT: The issues raised in the last two sentences are arbitrary and simply reflect the Lismore historic pattern to date. What evidence is there that the same pattern will necessarily prevail in the future!

Consider the possible impact that may develop when children born on a community come to be adults and wish to establish their own families and dwellings.

It is to be kept in mind that the age of the founding MO settlers were mostly in the same range, viz a heavy bias to the late 20's and early 30's. It is likely that this skewed age composition may even out over a time span of a generation or more.

Having this in mind, no arbitrary impediment should be imposed which may impinge on the parameters of the existing Policy.

Typical details should be given in the DCP as to when and why the maximum density of development (permitted by the SEPP formula) would be inappropriate.

The DA should include details by a speculative developer or a "community management body" as to why the proposed density sought is considered to be appropriate.

RECOMMENDATION: The prevailing average density is not an appropriate or acceptable ground for reducing the density level.

If the motivation for proposing a lower density is, at least in part, to be a disincentive for speculative development, then we suggest that here are other and better ways, in which this can be addressed. (See comments above).

(Two para. deleted).

COMMENT: The proposal to restrict density to one dwelling per 5ha. appears to have been taken from the Bellinghen DCP-MO.

Please see in this regard, comments by the Bellinghen Multiple Occupancy Action Group (MOAG), in the attached letter.

The MOAG advise that the formula adopted in the Bellinghen DCP was carefully and specifically developed to suit their particular circumstance.

They caution that their formula will not necessarily be applicable in other areas.

We observe that a deal of the rural land in the Lismore area is a mixture of undulating and steep land and understand that the density provision in SEPP-15 was written with such land in mind.

For these reasons we view that the Bellinghen formula is not applicable in the Lismore area.

In respect to the proposal to constrain density to one person per 2ha we note that when this is translated into the table given in the Draft DCP, that this would result in a decrease in the permissible population on a property of from 38% to 58%!

TABLE ... Comparative Densities

Area ha.	10	20	30	40	50 ha.
SEPP Dwelling Formula	4	7	9	12	14
DCP Dwelling Formula	3	4	6	8	10
Persons in SEPP Formula	12	16	24	32	40
Persons in DCP Formula, 1/2ha.	5	10	15	20	25
% reduction of persons on DCP Formula compared with SEPP Formula	58%	38%	38%	38%	38%

Taking even the lowest percentage viz a reduction of 38%, this is considered to be excessive and submit that such a deviation from the Policy is inappropriate.

An alternative way to look at the effect of the proposal is to register that at one dwelling per 5ha and at one person per 2ha, this results in their being on average 2.5 persons per dwelling.

This concept hence makes no allowance for an extended family living together, let alone two or more families sharing an "expanded dwelling".

RECOMMENDATION: That the existing provisions in the Policy be retained for the reasons outlined above.

(LCC PAGE 8.)

- 3.2.3 Dwelling should be clustered unless a dispersed arrangement can be demonstrated to be an environmentally better solution. (Delete section)

The density of residential accommodation will be permitted in accordance with Clause 9 of the State Environmental Planning Policy No.15

COMMENT: The issue of "clustering" should be given its own heading. (See 3.4.7 below).

3.3 Access

- 3.3.1 Public road access to a holding shall be via a constructed road which may have a gravel surface and which is not required to be flood free.

3.3.2 (Deleted Section)

COMMENT: As a "standard" the proposal is unreasonable and excessive and in particular cases may be so repressive that it could make the proposed development impractical on economic grounds.

Such an automatic provision is likely to invite frequent court appeals. Existing case law suggests that the Court would be unlikely to support this proposal.

- 3.3.3 Standards for internal access roads within the subject holding are generally for the owners to decide, but shall not exceed a grade of 20% unless constructed to meet Council's requirements in the circumstances of each application.

COMMENT: "Bitumen or concrete" will not be necessary or appropriate in all situations.

Roads shall be constructed and drained to provide most weather access and to minimise soil erosion. Where roads are on sloping land, it is recommended that the Department of Conservation and Land Management be consulted for advice.

Vehicle access to individual dwelling sites is optional. Emergency access by four-wheel drive to within at least 15 metres of each dwelling-house or dwelling-unit must be provided.

- 3.3.4 Access to a holding may be by use of right(-of-)way providing satisfactory legal opinion supports the use of the right-of-way by the

proposed multiple occupancy development and the access is constructed (deletion) to Council's adopted road standards.

3.4 Buildings

- 3.4.1 A building approval for each building must be obtained from Council before erecting or expanding any building on the holding unless otherwise advised by Council's Environmental Health and Building Services Division.

Each residential and communal building must comply with the Local Government Act and Building Code of Australia, except for ancillary farm buildings where Council may dispense with the need for a formal building application.

- 3.4.2 All building applications shall () in general conform() with the development approval or amended development approval as granted by Council.

A building application may be submitted concurrently with a development application or application for amendment of development approval.

(LCC PAGE 9.)

- 3.4.3 Where a building application is made by a community member, the BA is to be accompanied by the written consent on the community management body. (Deletion).

- 3.4.4 No building shall be erected on (deletion) prominent ridgelines. Buildings on land liable to flooding, (deletion), slip or mass movement, shall be at Council's discretion on a case by case basis. Buildings shall not be erected on "prime crop and pasture land". (See also Cl.2.2.3(f) above).

COMMENT: As all land is subject to some form of seepage the term "seepage" needs to be defined, or otherwise deleted in this context.

"Prime crop and pasture land" should be in quotations throughout the DCP.

- 3.4.5 No building shall exceed 8 metres in height measured vertically from mean natural ground level to the highest point.

- 3.4.6 Building setbacks from boundaries should recognise the adjoining land uses and if required buffer areas shall be provided. (See DCP-27 "Buffer Areas")

COMMENT: "Required" by who? If required by the community, then this clause should be deleted as it is more appropriate that it be in a Manual. If it is to be required by the Council, then give details of typical circumstances in which a setback may be required. Likewise give typical examples where a buffer may be required and an indication of typical distances.

- 3.4.7 Clustered and Dispersed Patterns of Settlement
Consideration should be given to clustering buildings rather than they be dispersed across the holding. (Deletion).

COMMENT: The extent and form of any clustering is, from experience, closely related to the particular land form. Land form varies widely from property to property.

From a fire protection point of view, dispersed dwellings may have an advantage over clustered dwellings, in providing cumulatively a bigger area of cleared ground litter, and in having resident fire fighters dispersed over a larger area.

The notion that people who live (or are forced to live), close together, will necessarily result in a bonded community, is unsupported by the evidence.

"Preference for clustered development" (Cl.2(c)) should always be seen for what it is, namely a "preference" on merit in each particular case.

3.4.8 In order to provide for transitional accommodation during the process of construction of permanent dwelling houses Council issues licenses for temporary accommodation. Licenses are subject to the following requirements:

- . owners to occupy the temporary accommodation
- . licences not being transferable
- . development and building consents to be obtained within twelve months of licence date of issue
- . adequate water and sanitary facilities to be provided prior to temporary occupation.

(Deletion)

COMMENT: This restriction is inappropriate and inconsistent with the requirements of point 3 in 3.4.8 above.. In fact residents ought to be encouraged to camp on potential dwelling sites to experience the local environmental and climatic factors. Details should be provided in the DCP on the alternative forms of legally, camping or residing on the property. (See also comments from MOAG in attached letter, in this regard).

Details should be included on the equivalent of (a) Class X structures as defined in Ordinance 70 under s.306(2) of the L.G. Act 1919 and, (b) movable dwellings under s.289 of the L.G. Act 1919.

Consider for inclusion: "All transitional dwelling-house licences will be for an initial time period of two years and then be renewable for one year periods, up to a total of six years altogether".

3.5 Water Supply

In the development of land for multiple occupancy purposes the impact on water resources should be examined in detail. Developments should not necessarily be reliant on creek and river supply for domestic use and preferably should consider providing stored or ground water reserves for agricultural and fire protection purposes.

3.5.1 Adequate water supply shall be available to each dwelling house or expanded dwelling house.

- 3.5.2 A piped water supply shall be provided to each kitchen, fed from an appropriate source. Such a source could be roof water collection tanks, springs, bores or dams independent of existing creek and river supplies and having a demonstrated drought reliability. A minimum of 5000 litres storage per person for domestic use is suggested if supply is from roof water.
- 3.5.3 It is recommended that water supply quality be tested to ensure it is safe for drinking. Council's Health and Building Department can provide suitable testing advice.
- 3.5.4 In designated medium or high fire risk areas, appropriate reserved supplies of water for fire fighting purposes shall be maintained in suitable tanks or dams, if adequate permanent pools in creeks or rivers are not available. For advice on the appropriate capacity of these reserves consult Council's Fire Control Officer or the local Bushfire Brigade. Any water pumped or reticulated in plastic pipes, such as poly pipe, from these sources shall be laid underground where possible.
- It is recommended that connection points with standard fittings for fire hoses be placed at intervals, () at the end of any () reticulated water lines () and at appropriate access roads. () Where pressure or flow is not adequate, a standby pump is strongly recommended.
- 3.5.5 A Water Management Plan addressing the following issues is to be provided (see 2.2.4 above) at the time of submitting an application for multiple occupancy:

(LCC PAGE 10.)

- . location of drainage lines, ground water, bores, wells, springs, dams, swamps, floodplains and seasonal wet areas.
- . location, source and capacity of water supply for domestic, agricultural and fire prevention uses.
- . vegetation buffers between areas of development and waterways.
- . access erosion and sediment control measures.
- . land clearing and shaping.
- . drainage facilities and discharge points.

COMMENT: A Water Management Plan should be provided in all DAs.

3.6 Effluent Disposal

- 3.6.1 All dwelling houses or expanded dwelling houses shall be served by an earth closet, pit toilet, composting toilet, septic system or approved equivalent. Such closets or systems shall be in conformity with the requirements of Council's Environmental Health and Building Services Division and approved by the Health Department of NSW (Council has a list of systems so approved). Some systems not approved may also be permitted after consultation with Council's Environmental Health and Building Services Division. Septic systems must have an adequate water supply.

COMMENT: Suggest that consideration be given to including a statement that generally septic systems are discouraged on health grounds..

- 3.6.2 The location, construction and size of absorption trenches should be discussed with Council's Environmental Health and Building Services Division.
- 3.6.3 No pit, closet, sullage or septic effluent absorption trench shall be located within 50 metres of any water course used as a source for drinking.
- 3.6.4 All kitchen sullage shall pass through an approved grease trap.
- 3.6.5 No sullage water shall be discharged direct onto the ground without passing through adequate grease traps or other suitable facilities approved by Council's Environmental Health and Building Services Division.
- 3.6.6 Council may require the provision of an effluent disposal report where a development exceeds ten (10) dwelling sites and/or site characteristics or experience suggest constraints to on-site disposal of waste.

The report shall () address the following matters:-

1. A contour plan of the dwelling sites at maximum 500mm intervals and to an approved scale, including significant site features, eg drainage lines and watercourses, escarpments, rock outcrops and significant trees.
2. Details of site assessment procedures for each individual allotment including reference to AS 1547 and to other recognised standards/practices. Effluent loadings, soil characteristics, biomass permeability and the impact of ground and surface water should also be addressed. Potential effluent reduction by water conservation practices or devices may also be included.
3. Provide information on the longterm capability of the land to accept effluent and include minimum design details for effluent disposal systems and shall address the following:

- i) Provision of (deletion) of any "expanded dwellings";

COMMENT: The DCP should make clear the current legislative options (if any) in respect to the availability or otherwise, of "detached dual occupancy" dwellings and, bona fide "workers dwellings" on an MO property.

- ii) Replacement of effluent disposal areas;
- iii) Identify preferred areas on each home management area for effluent disposal and identify likely house sites. Effluent disposal areas should not be subject to any vehicular traffic and should be clear of areas utilised for general recreation.
- iv) Details of surface and subsoil drainage in relation to effluent disposal areas.
- v) Management practices to ensure optimum long term operation of site disposal systems.

(LCC PAGE 11.)

(Delete, redundant).

3.7 Waste Disposal

3.7.1 In order to reduce health hazards to occupants, all non recyclable solid wastes shall where possible be stored in fly proof containers and preferably taken to Council's tip.

3.7.2 (Deletion)

COMMENT: The practice of using trenches to dispose of non-recyclable solid waste is not supported as a "standard" or a preferred option on the grounds that it is environmentally inappropriate except in special situations.

The introduction of toxic chemicals may contaminate surrounding soil and water unless special precautions are taken.

The type of disposal seen as at risk in adversely affecting the environment in this regard includes:-

- # certain plastics,
- # containers used to hold poisons and like toxic chemicals,
- # mercury batteries and the like,
- # certain treated wood eg. CCA treated wood,
- # conglomerates eg. a broken toy containing inseparably wood and plastic.

A special item should be included in the DCP in respect to the burning of rubbish, particularly such items such as car tyres and plastics.

Council should prepare guidelines on how rural owners should dispose of such waste. Such guidelines should be applied to all rural land and be included in the proposed DCP-Rural Land Generally. In the meantime such a guideline should be attached to DCP-20.

3.7.3 Any common area used to store contained waste shall be in a location which:

(Insert the following.)

- a) Is placed not in direct view from any public road, adjoining property, main community access road, dwelling house or expanded dwelling house: (deletion)
- b) Is placed a minimum of 100 metres from any dwelling house, expanded dwelling house, or watercourse;
- c) Is not located in any water catchment strata and located so as to avoid contamination of any water source or watercourse;
- d) Is concealed by topography, (or) existing planted vegetation;
- e) (Deleted)
- f) Has vehicular access; and
- g) Is operated in accordance with directions of Council's Environmental Health and Building Services Division.

3.7.4 Composting of all organic wastes is encouraged. Council's Environmental Health and Building Services Division should be contacted for advice and location of rural recycling pick-up points and centres.

3.8 Prime Crop and Pasture Land (Separate)

3.8.1 Multiple occupancy development is not permitted where more than 25% of the holding consists of Prime Crop and Pasture Land.

COMMENT: (a) It is the policy of the Pan Community Council that if it can be shown that it is the primary intention of the community to use the land for an applicable agricultural purpose then an MO community should not be excluded from working such land where it has a potential to be developed as a community resource and to generating income.

From our point of view it is seen that if and when, this should become an issue, that this be taken up in an appropriate way and at the appropriate level of government. Until this time, it is considered appropriate to simply restate the Policy.

(b) See also notes in 2.2.3(f) above in respect to "prime crop and pasture land". Consider bringing all these items under this heading. Cross reference all such items.

RECOMMENDATION: Rework all entries on this issue with a view to consolidating this aspect of the Policy.

3.8.2 No dwelling houses, expanded dwelling houses, solid waste disposal or waste collections points shall be permitted within any area of "prime crop and pasture land" as defined. These areas shall be reserved for agricultural and horticultural uses only. Sheds associated with these uses may be permitted on "prime crop and pasture land" if other appropriate sites are not available.

3.8.3 Adjoining Land Uses

To determine and avoid any potential land use conflicts the applicant shall consider adjoining agricultural uses and have undertaken an adjoining land owner survey. This information should be included in the statement of environmental effects and address issues such as:

- . natural features (hills, vegetation, watercourses etc)
- . distances between the proposed development and adjoining land uses.
- . competing water demands.
- . noise.
- . agricultural spray and chemical application.
- . control of domestic animals.

(LCC PAGE 12.)

- . intensive agricultural land use (dairies, piggeries, horticulture etc).
- . quarries.
- . fencing etc.
- . noxious weed and feral animal control.

3.8.4 An agricultural suitability assessment including maps shall be provided where the holding comprises any "prime crop and pasture land".

3.9 Cemeteries

Applicants may set aside a suitable area of land for the establishment of cemeteries at the time of making a development application. Approval for the establishment of cemeteries is subject to requirements of Council's Environmental Health and Building Services Division as determined by Council Policy No. 06.02.11.

COMMENT: The provision for "Home Burials" should be spelt out in detail as an alternative to a cemetery.

3.10 Utility Services

Connection of telephone and electricity supply to the holding is optional. Where connection is proposed written evidence should be provided with the development application indicating availability of supply and proposed location of the reticulation system.

COMMENT: Cross reference with 2.2.3(g) above.

3.11 Fire Protection

3.11.1 A fire management plan should be submitted with all development applications for multiple occupancy development. This management plan shall be incorporated into the statement of environmental effects and address the following issues:

- a) Landscaping and fire protection breaks and zones.
- b) Access for emergency vehicles and overall site layout to fire fighting facilities.
- c) Building design criteria.
- d) Internal organisational and consultation processes (eg local brigades and Council's Fire Control Officer).
- e) Equipment to be provided.

3.11.2 Adequate fire breaks shall be provided to protect each living area and to inhibit the escape of any fire from the area.

3.11.3 Each building should have an area surrounding it not less than 5 metres in width kept clear of flammable material (such as fallen leaves, bark or twigs) except for cultivated garden.

3.11.4 Any dwelling house or dwelling unit sited in a designated high bushfire risk area and within 20m of any forest exceeding 1 ha in area shall have a fire refuge preferably adjacent to the dwelling house or within 100 metres of the dwelling house.

3.11.5 Fire refuges referred to above are to be either a pond, dam or river of adequate size or an above or inground enclosure constructed with non-combustible materials so as to shield the interior from any direct radiation of heat from a fire outside the refuge. Fire refuges shall have a floor area of 0.35m² per person served by the refuge. Council's Fire Control Officer can advise on fire refuge design and location.

3.11.6 Where any dwelling house or dwelling unit is sited in a designated high bushfire risk area and adjoining any forest area, consideration should be given to reduction of the tree canopy.

COMMENT: Reduction in tree canopy may conflict with other provisions in the DCP eg. vegetation screening to avoid adverse visual impact.

- 3.11.7 The occupiers of each building shall maintain adequate fire fighting facilities and are encouraged to join appropriate strategies in conjunction with local fire brigades, Council's Fire Control Officer and neighbours.

(LCC PAGE 13.)

3.12 Staging of Development

- 3.12.1 Staging details of a multiple occupancy may be submitted with the original development application or at a later date () an application may be made for amendment to the existing development consent under Section 102 of the Environmental Planning and Assessment Act.

COMMENT: Cross reference to, and see comments in item 2.2.3 above.

Where it is not the intention of a speculative developer to reside on the property in the long term, reasons should be given as to why Council should not require a staged development application.

(See also comments at 3.1.4). It would be reasonable to expected in such a situation, that the second stage of the DA would be generated by the "community management body" as distinct from the speculative developer.

- 3.12.2 Where on-site community facilities are proposed, staging proposals must give due regard to these facilities in early stages of development. It will (deletion) be permitted to fully develop all residential buildings as a first stage follow(ed) by community facilities at a later stage.

Community facilities may be used as transitional accommodation.
(Deletion of part).

COMMENT:

(a) It is inappropriate to require a nexus between the construction of a residential dwellings and community facilities. What rational explanation is there for this proposal! If this proposal is motivated to "discourage" speculative developers, there are as referred to above, other and better ways to achieve this.

(b) Most dwellings are constructed by the future occupant.. Quite often such owner builders have had no prior building experience, so hence the process is a lot slower than would be the case if a professional builder were engaged.

The owner builder may take up residence at the equivalent of the "lock up" stage and continue working on the building, possibly for years before reaching the equivalent stage of a commercially built house in an urban area.

It is to be kept in mind in this context, that home finance is not normally available for such dwellings, that energy sources to drive electrical equipment may be severely limited, that the occupier may be an inexperienced builder and, that the heavy rainfall pattern in the area can seriously inhibit building progress.

All these contribute to a building practice that cannot be meaningfully compared with that in an urban counterpart.

3.12.3 Building applications may be submitted over a period of time for each stage of development.

3.13 Restricted Uses and Ancillary Development

3.13.1 No holding approved for multiple occupancy shall be developed for the purpose of a residential flat building, tourist accommodation, motel, hotel or caravan park except where development for such purposes is permissible under the provisions of the City Lismore Local Environmental Plan 1992.

3.13.2 Nothing in this clause prohibits the development on-site of ancillary uses other than dwelling houses or agriculture, providing that these uses are intended primarily to serve the needs of people living on the land. Example of such uses are schools, community facilities, home and light industries, () workshops, () eco and other forms of tourist facilities.

COMMENT: Include details of those zones in the LEP which permit tourist facilities in rural areas, and is permissible development on MO's.

3.14 Contributions

3.14.1 If it is identified by Council that multiple occupancy development will cause an increased demand for public amenities and public services, the dedication of land or a monetary or an in kind contribution or a combination of these shall be required under Section 94 of the Environmental Planning and Assessment Act 1979, as amended. This contribution will occur as a condition of development consent and be applied to the upgrading (but not maintenance) of those amenities and services.

3.14.1 The type of public amenities and public services referred to above may include:

- a) Rural road upgrading.
- b) Community and recreation facilities.
- c) Public open space.
- d) Bush fire fighting facilities.
- e) State emergency services.

3.14.2 Contributions attributed to each dwelling may be paid at the time of submission of a building application for that dwelling rather than paying the total contribution at the commencement of the multiple occupancy development. (Rewording)

Where it is appropriate to pay a s.94 contribution at the BA stage, it should be noted that the contribution is generally increased on a yearly basis and generally this in line with the Consumer Price Index or similar.

3.14.3 Council will give consideration to dedication of land or, in kind contributions under Section 94(2c)(b) being labour or works or other contribution, as part or all of the contribution required if such works are identified in the applicable s.94 Contribution Plan.

COMMENT: (a) Include details on how a s.94 Contribution Plan is prepared and works. Suggest include details on entitlement to obtain information on where and when the money has been, or is to be spent.

(b) The following should be included in the DCP as typical examples of items that Council would consider in calculating a s.94 contribution;

(i) an easement for a public walking track to a scenic vantage point,

(ii) an easement on a section of a stream bank for public use as a boat landing area, and for camping,

(iii) the dedication of, or an easement over, stream bank land, fenced to prohibit the general access of agricultural animals to the stream, except at constructed access points for the purpose of drinking.

3.14.4 When a Section 94 contribution has been found to be required, and where the applicants:

- a) propose a long-term staged development; and/or
- b) propose a large staged development; and/or
- c) can show economic hardship;

the Council will give consideration to deferment of contribution and/or the contribution to be made by instalments.

End

STATE OF THE ENVIRONMENT REPORTING
IN RESPECT TO MULTIPLE OCCUPANCY PROPERTIES

INTRODUCTION

STATE OF THE ENVIRONMENT ANNUAL REPORTING
BY LOCAL GOVERNMENT

The Local Government Act 1993 requires councils to prepare annual reports on the "State of the Environment" (SOE) and to this end requires the Environment Protection Authority (EPA) to prepare guidelines for the preparation of these Reports.

These guidelines are contained in "SOE REPORTING BY LOCAL GOVERNMENT: Environmental Guidelines", 1993.

Council Reports are to nominate "targets" for improvements in the ensuing twelve months. (The degree to which these "targets" are achieved, is to be evaluated at the time of the subsequent Report).

The first SOE Report (referred to as the "baseline") is to be made in May 1994.

In preparing a Development Application for a Multiple Occupancy, it is appropriate that consideration be given to the "themes" and "indicators" outlined in the above publication.

The Act requires that there be community consultation in the preparation of these Reports.

CHECKLIST OF "THEMES" AND "INDICATORS" FOR CONSIDERATION
IN PREPARING ANNUAL - STATE OF THE ENVIRONMENT - REPORTS IN
RESPECT TO MULTIPLE OCCUPANCY PROPERTIES

- NOTES (1) Headings in bold type are those used in the EPA
Guidelines on SOE Reports to be made by councils.
- (2) The SOE "indicators" in this checklist have been selected
on the basis of having possible relevance to MO
settlement. Some have been rephrased and/or amplified.
- (3) Where the term "community" is used below, this refers to
MO communities.

1.0 AREAS OF ENVIRONMENTAL SENSITIVITY

- 1.1 Are there areas on the property which you considered are
"environmentally sensitive" and the community has taken steps
to, or has plans to protect or conserve?
- 1.2 Does the community engage in reforestation of native trees on
the property?
- 1.3 Are there creeks, rivers (shared), springs, dams, bores
or the like on the property?
- 1.4 Is the quality of water held as being a valued natural
resource?
- 1.5 Are steps taken to attain the highest possible level of
the quality of the water, and, that natural water sources are
not polluted by eg sewerage, toxic chemicals or the like?
- 1.6 Have steps been taken to verify if there are any Aboriginal
sites of significance on the property?
- 1.7 Is there a pressure to erode sensitive environmental areas by,
for example, clear felling of trees, or over grazing?

Unique landscape or vegetation

- 1.8 Are there areas on the property which you consider have
unique features, or are unique vantage points, or, contain
unique vegetation?
- 1.9 Is there a bushfire management plan for the property?

2.0 BIODIVERSITY

Wildlife and Habitat Corridors

- 2.1 Are there wildlife habitats and corridors on the property?
- 2.2 If there area feral animals on the property does the community
have a policy re containing or eradicating such animals?

- 2.3 Does the community have a policy on weed control and management?

Threatened species of flora and fauna

- 2.4 Are there rare and/or endangered species of flora and/or fauna on the property?

3.0 WASTE AND POLLUTION

Waste Management Policy

- 3.1 Does the community foster alternative forms of sewerage disposal and the reuse and recycling of materials?
- 3.2 Does the community have its own garbage disposal area?

4.0 ENVIRONMENTAL RESTORATION PROJECTS

- 4.1 Have any members of the community been involved in restoration activities or in a Landcare group?
- 4.2 Are there areas of old growth forest on the property?
- 4.3 Is the land considered to be degraded and if so, what rehabilitation or restoration has been undertaken?

5.0 HUMAN ACTIVITIES AND CHARACTERISTICS

Demographic

- 5.1 Demographic data; (population, ethnicity, age, economic status, dwelling occupancy density, employment, trend in growth rate, and the like)?

Human impact on the rural environment

- 5.2 Impact on air quality, noise and the like. Use of chemical fertilisers, contaminated sites, waste disposal sites, heritage sites and the like. Visual impact of the development from vantage points outside the property?

Energy efficiency

- 5.3 Level of energy generation (solar, wind, water, organic sources etc)?

Land type

- 5.4 Degree to which the land is utilised within its capability?

End



BELLINGEN MULTIPLE OCCUPANCY ACTION GROUP



Please address reply

C/- 3, Casuarina Avenue
Bellingen, NSW 2454

Peter Hamilton
Pan Community Council
PO Box 102,
NIMBIN 2480

1 Feb '94

Dear Peter,

Re: Lismore Council, Draft DCP No 20- Multiple Occupancy of Rural Lands

This draft, as you are aware, draws heavily on the Bellingen DCP, which has been in operation since Feb '88. To the best of our knowledge there have been no problems over its implementation. This however, is not surprising since Bellingen MOAG was extensively involved in the code's formulation, initially through Jack Wyatt's study and then through the various stages until final formalisation by Council.

Density 3.2.2

We note with interest that the density formula proposed for Lismore is the same as that for Bellingen, ie approximately half that allowed under SEPP 15. It is important to understand that the density for Bellingen was arrived at so as to take into consideration:

- a) the specific environmental conditions of the shire
- b) the need to ensure that all existing multiple occupancies as at the time the code came into operation could be legalised

The Bellinger Valley, where most of the MOs are located on blocks with river frontage, was, and still is, an environmentally sensitive catchment area. When the DCP was being drafted therefore, multiple occupancy groups, through MOAG, lobbied strongly for the low densities finally adopted on the grounds that whilst allowing for community development they would be environmentally responsible. Such densities may not be appropriate for MO in other shires. Of particular concern in the Bellingen situation was that almost all the land available to communities for MO was in narrow blocks, former dairy farms, stretching from the river frontage, with a small amount of cleared alluvial land with good potential for gardens/ agriculture and house sites. and main road access. A large percentage of each block, however was steep forested land running back to the ridge line. In such conditions, while the blocks themselves might be large, the land available for settlement was not only severely limited, but directly adjacent to the river with the potential to severely stress the environment.

Potential Land Use Conflicts 3.8.3

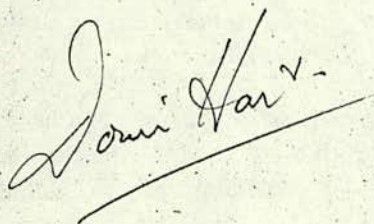
This is an issue not addressed in the Belliingen DCP. It is MOAG's view that such an approach to rural planning is eminently sensible, only, however if it is equitably applied to all forms of rural development, not just Multiple Occupancy. We would assume that such a condition, if introduced, would be required of all developments in Lismore Council.

Transitional accomodation 3.4.8

The condition that development and building consents must be obtained within 12 months of the transitional accomodation licence does not exist in this shire. MOAG's view is that such a time limit would be unreasonable. It is our experience that (particulary) owner builders producing low cost homes often need considerable time to achieve a final design for their dwelling. Additionally some Multiple Occupancies actually require new members to live on the property for at least 4 seasons (to allow for full familiarity with the local environment) before attempting to design a home.

Having made the points above, however, in general we consider that the draft DCP, as proposed for Lismore, is a positive and responsible approach to planning for MO

Yours

A handwritten signature in cursive script, reading "Dorin Hart", with a horizontal line drawn underneath it.

Dorin Hart

Acting Secretary