

*Copy for Peter*

*L'head*

15th February 1994

Dear Mr Page,

Please find enclosed a letter I recently sent to Mr Webster your National Party colleague and Minister for Planning. This letter raises a number of the reservations that Pan Com has regarding the consultants and their brief for the review of **STATE ENVIRONMENTAL PLANNING POLICY 15**. I have particularly looked at the following issues which seem to create most concern about Multiple Occupancies. These issues are:

- \* land speculation
- \* access to housing finance
- \* subdivision of MO's

I have also included proposals that may be to the long term benefit to the State Government and MO members.

I would appreciate the opportunity to discuss some of the Multiple Occupancy issues with you personally in the near future. I will ring your electoral office to make an appointment, possibly with another Pan Com representative.

I would also like to extend an invitation to you to visit our multiple occupancy community and see how our community works.

Yours sincerely,

Simon Clough  
for Pan Com

30th JANUARY 1994

MR ROBERT WEBSTER MLA  
MINISTER FOR PLANNING  
PARLIAMENT HOUSE  
MACQUARIE STREET  
SYDNEY 2000

Dear Mr Webster,

**Re: Review of State Environmental Planning  
Policy No15 Multiple Occupancy of Rural Land**

I am writing to you after having discussions with Bill Rixon our local member on the whole issue of Multiple Occupancy.

**ABOUT PAN COM**

Pan Com is a community based organisation established 6 years ago to protect and further the interests of Multiple Occupancy (MO) communities. In addition to lobbying all levels of government Pan Com has organised working bees on major MO community projects, workshops and social gatherings. Pan Com is mainly active in the NE corner of NSW where there are well over 100 communities.

**CONCERNS ABOUT THE CONSULTANTS**

To the best of Pan Com's knowledge neither of the consultants hired for this brief have any first hand experience of life or involvement in a Multiple Occupancy (MO) community. Whilst not doubting the professionalism of the consultants we feel it would have been more appropriate to appoint consultants who have more experience in this area. MO gives rise to a great many inter-related planning and social issues which are best understood through experience.

Of particular concern to Pan Com is the method the consultants are using to obtain their principal data about MOs. They are proposing

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to send a questionnaire to each community. There are real problems with this:

1. Who is to receive the questionnaire? In many communities there are no clear hierarchical structures.

2. How can one person be expected to express an opinion for 20 to 30 people and up to 250-300 people?

We now understand that in addition to questionnaire the consultants will be holding a day of interviews in selected local government areas. Whilst this may give more qualitative data, it is likely that the interviews will only attract those with a negative attitude towards multiple occupancy.

### LAND SPECULATION

In talking to the member for Lismore Bill Rixon I understand that the issue of unscrupulous people using the MO policy for speculation and deception is of concern to him and the government.

Pan Com totally shares this concern and believes that land speculation using the MO policy is against the letter and the spirit of SEPP 15 (see 2.(c)(ii)). For these reasons there are avenues for Councils to control speculation. Lismore City Council is currently considering an Advisory Panel on MO that will help in the review of all MO applications. The Advisory Panel should consist of people with long experience of multiple occupancy who will be able to clearly establish if the proposed development is speculative in nature. In combination with Council's new Development Control Plan this should mean that the possibility of a speculative MO being approved is reduced. There may however be an argument for strengthening the application of SEPP 15 by councils.

### ACCESS TO HOUSING FINANCE

This issue falls outside the guidelines of the review. Bill Rixon raised it as an issue of concern for many people on MOs. It seems that it can only be dealt with on a government level by instituting special loans or small grants such as the First Home Owners Scheme a former Federal government program that was available to

MO members. Another possibility is the government helping to change the policy of lending institutions towards MO's.

#### SUBDIVISION

The whole concept of MO is based on the fact that the land is not to be subdivided, to allow subdivision would be to destroy the major principle behind MO. If the government were to allow subdivision on MO's it would be creating some very difficult problems. On any given MO it is unlikely that there would be any consensus to allow subdivision. This could leave communities in long term dispute between factions for and against subdivision.

Community Title (CT) is sometimes seen as a way of "tidying up MO's", giving them all the advantages that flow from individual ownership, such as easy access to finance and ability to sell your land unconstrained by others on the "community". However this so called solution gives rise to problems that would destroy the principles that MO is founded upon.

First CT is not a low cost option. For example a recently completed CT development near Nimbin is selling blocks for a minimum of \$40,000. For considerably less than this amount a person can buy a share and build a modest but comfortable house on an MO. The price difference is brought about by the legal and planning requirements of CT. The finance required to develop a whole community under CT legislation would make it impossible for low income earners.

MO by and large is an option pursued by those on a low income, without access to finance and loans. It provides a means of affordable land ownership and is not an attractive option to those who see real estate ownership as a financial investment for the future. Any form of subdivision will result in MO's becoming more expensive as people seek financial gain, hence defeating one of the primary reasons for SEPP15.

Second the ability of community members to control who can become members of their community is very important. Many

communities have trial periods for prospective members to ensure compatibility with other members. If CT were to become the only option this would mean it would be very difficult for communities with a high degree of co-operation and community to be established.

Pan Com believes that CT is a valuable option that some people in society want. However it should not be confused with multiple occupancy communities.

Allowing subdivision of MO will produce many planning problems with what would amount to rural residential subdivisions in areas that are not appropriate for this form of development.

## PROPOSALS

Pan Com is very interested in developing two proposals;

1. That a course be organised through the Institute of TAFE on MO and the philosophies behind these communities. The course would involve both theory and practical and would draw on material already prepared for Northern Rivers UNE now Southern Cross University. Such a course would be very valuable to Department of Planning officers and other state government employees who deal with MOs. Pan Com is currently investigating the feasibility and costs of TAFE preparing such a course.
2. The Department of Planning prepare a "Multiple Occupancy Handbook". This book could go a long way to dispelling any misunderstandings and ambiguities that may have arisen about MO. The handbook could lead people from the conceptual stage right through the approval to the building stage. It should be remembered that "The Low Cost Country Home" book initially put out by the Department was a good seller. Pan Com would be prepared to assist in the preparation of a handbook on a consultancy basis.

COMMITMENT

**Can you give us your undertaking as appropriate minister that any changes to SEPP15 will not change MO's ability to continue to offer affordable low cost rural housing within a community?**

We believe that this is central to SEPP 15 and we want it preserved.

I look forward to your response to the concerns and suggestions that we have raised.

Yours sincerely,

Simon Clough  
for Pan Com