

Purdon Analysis
MASTER
12 p (with Biblio)

“AN ANALYSIS AND CRITIQUE OF THE PURDON REPORT”

**(Being a Review of State
Environmental Planning Policy No 15 -
Multiple Occupancy of Rural Land.
Volumes 1, 2 and Summary Report by
Purdon Associates Pty. Ltd. 1994.)**

By Graham Irvine, 1995

Introduction

The following material is an extract from **Multiple Occupancy and New South Wales Planning Law Policy** by Graham Irvine being a Legal Studies Research Assignment for the Law Degree at the Southern Cross University, 1995.

This assignment was presented in two volumes. Some references in this extract refer back to earlier material in Vol. 1 and Vol 2. Should such reference material be required it is available on request.

The Bibliography is included in this extract.

The Purdon Report: Analysis and Critique

Since the decision to repeal State Environmental Planning Policy 15 (SEPP) was based entirely on the findings and recommendations of the Purdon Report it is essential to examine the methodology and conduct of the study in order to assess its adequacy.

The following analysis generally follows the order of the Review Summary Report, as this was the document on which the Minister's decision to repeal was based.

It is submitted that the review's methodology was fundamentally flawed and that therefore most of its conclusions and recommendations are invalid.

To begin with the consultants had no idea of the number of MO's in NSW, their location or their population. Therefore they were totally reliant on Council information and on MO's who volunteered information by responding to newspaper advertisements seeking information.

However as only 55 of the 67 Councils to which SEPP 15 applied chose to return the Purdon questionnaire and as it is common knowledge that Councils' information on MO's is incomplete, it is evident that the database on which their recommendations rest is inadequate. Moreover when the responses to individual questions asked in the questionnaire sent to Councils are examined it can be seen that less than half of the responding Councils answered any of those individual questions, making a mockery of the claimed 85% response rate.

This inadequacy is demonstrated by the discrepancies in MO population estimates in the review documents themselves, eg. at par. 2.3.3. vol 1 the NSW MO population is variously estimated at 1350, 1750 or 7000, whilst at 3.2.4 the authors claim, "the policy applies to a maximum of 2000 people on an estimated 500 properties across NSW¹". Similarly this figure of 500 MO's may be contrasted

¹ p. 23

with their estimate of "about 220 MO's " on P.13, vol. 1. In turn this figure conflicts with another at P. 3 of the Summary Report which claims that the review was based on "a survey of about 280 individual MO's in six Local Government Area's (LGA's)." These figures are misleading because only 23% of these MO's replied and hence the authors' recommendations are again based on a totally inadequate sample of only 64 MO's. Again there are serious discrepancies in the review's database concerning the number of dwellings on MO's, with the Councils claiming a total of 486 whilst the MO residents survey yielded 908 dwellings.²

On their own statistics only 23% of MO's replied to Purdon's questionnaire, representing 0.8% of their estimated MO population. This is simply grossly insufficient as a database from which meaningful conclusions can be drawn. Even the authors admit to, but decline to discuss, "some discrepancies in this data from different sources".³

Apart from these two quite inadequate surveys, Purdon relied on "consultations" and a literature review of "all currently available information relating to the operation of the policy"⁴. Yet they do not include a bibliography or any discussion of the sources or methods of this literature review, which did not, eg., include material on the subject held by the Pan Community Council (PCC), among others.

The "consultations" relied on were also inadequate. There were brief meetings with 39 individuals, (self-selected through their response to the consultants' advertisements and thus not comprising a representative sample), over 4 days. Many of these individuals were either developers, interest groups or non-MO citizens opposed to and often ignorant of MO's, whilst others were Councillors or Council staff whose opinions had already been canvassed in the questionnaire to Councils. In addition the authors relied on 24 written submissions consisting of 8 submissions from individuals on MO's, one from a group of MO residents, 5 from Councils, 3 from interested groups and the rest from individuals. Again this was a highly biased and unrepresentative source of information.

The final source of information relied upon by Purdons was "All public authorities having a potential interest in MO development [which] were consulted and asked to provided [sic] details of their experiences and concerns"⁵. It is simply untrue that "all public authorities...were consulted," as letters were only sent to 9 state government departments - and not to, eg. Environment Dept., Attorney Generals Dept., and 3 regional authorities, comprising a total of 14 authorities. Of 33 letters sent, 13 replies were received - another inadequate sample - and most of these claimed to have little knowledge of MO's.

Given this methodological basis it is contended that little if any reliance can be put on the review.

² v.1, pl15,2.3.4

³ SR p.34, vol. 1, p.12

⁴ vol.1, p.3

⁵ vol.1, p.3

1. Summary Report

The main reason for Purdons' recommendation for repealing SEPP 15 is that, "The very low level of demand for MO developments reinforces the conclusion that MO development is essentially of local rather than state significance,"⁶. This conclusion is incorrect and misleading for several reasons.

Firstly, the statistics on which they base their judgement are questionable at least, eg. Table B1⁷ lists the number of Development Application, (DA) approvals since 1988 as 25 and the number of sites as 118, whereas Lismore City Council's (LCC's) statistics above yield 39 DA's approved for a total number of 314 sites⁸. Moreover Purdon's figures don't include figures on the substantial number of applications by MO's for additions or variations of Development Consent (DC)⁹.

Secondly, it is fallacious to determine whether a policy is "of state significance" merely because, "The majority of MO's are concentrated in the north eastern corner of NSW"¹⁰ or because the policy presently covers "only a very small percentage of total properties or resident population throughout the state"¹¹. If these criteria were applied to other SEPP's, such Policies as SEPP 3, Castlereagh Liquid Waste Disposal Depot or SEPP 29, Western Sydney Recreation Area would also need to be repealed.

Thirdly, when the numbers of MO DA's, made under SEPP 15 since its first promulgation in 1988, according to Purdon's figures¹² are compared with Community Title DA's made under the Community Land Development Act 1989, it can be seen that , according to the Councils survey, "There were 5 rural residential Community Title subdivisions operating in LGA's that responded to the survey; [and] another 8 applications had been received over the last 12 months"¹³. Yet these consultants do not recommend repealing Community Title provisions and indeed they encourage their use¹⁴.

Finally, the consultants have misinterpreted their own statistics and contradicted their own conclusions. Whilst they report that, "Recent years have seen a substantial decline in both the number of new MO applications and development approvals...."¹⁵ their very next page contradicts this, claiming, "there is a small but ongoing demand for MO development,"¹⁶. In the main report they also state that,

⁶ SR, p.1

⁷ v.1, ? .B, p.131

⁸ Discussion Paper on MO," LCC, 1994, p. 3.4

⁹ *ibid.*

¹⁰ SR, p.1

¹¹ *ibid.*

¹² 187, p.132

¹³ v.1, p. B 2B

¹⁴ SR, p.15

¹⁵ SR, p.1

¹⁶ *ibid.*, p.2

"The majority of Councils receiving MO applications in recent years indicated that the level of MO DA's have remained relatively constant....."¹⁷. Indeed at least one Council indicated that they expected additional SEPP 15 developments in their area within the next 5 - 10 years¹⁸.

In the light of these contradictions it is submitted that Purdon's judgement, "that the Policy is not really doing much work and its use since inception is declining"¹⁹ is not credible and cannot justify repeal of SEPP 15.

The Summary's other "main conclusions" are similarly suspect. It recommends that, "MO's should be treated in a similar manner to other forms of rural development in terms of planning assessment, environmental management, rating and S.94 Development contributions,"²⁰. In fact MO's are already treated in a similar manner - they are subject to the same planning and environmental assessment under the Environmental Planning and Assessment ACT (EP&AA); the same types of assessment factors under SEPP 15, cl. 8 and the same formulae for s.94 contributions.

The authors offer no evidence at all for their final conclusions - that "removal of SEPP 15 is not seen as having any adverse affect on existing MO Communities,"²¹. Such a question was not asked in either the Councils' or the MO residents' surveys and no such statements were reported as being made by other individuals or organisations consulted.

On the contrary, the repeal of SEPP 15 has left MO's in the legal limbo of "existing use rights" which are complex and uncertain and which do not facilitate alterations or additions to existing MO's. Early indications in the Lismore area suggest that SEPP 15's repeal has led to a lower valuations of MO properties²², and at least one new MO DA has had to be withdrawn²³.

Issues

"Policy Context and Objectives," Part of the consultants' rationale for SEPP 15's repeal relies upon the contention that part of its purpose was to regularise illegal MO developments and hence that, because, "Considerable numbers of unapproved MO [sic] continue to exist,"²⁴ the Policy has failed.

¹⁷ v.1, p.B5

¹⁸ v.1, p.B21, at 2.2.4

¹⁹ v.1, p.23, 3.23

²⁰ SR, p.2

²¹ *ibid.*

²² L. Hicks, Registered Valuer, Nimbin personal communication, 29/6/95

²³ Blackford, B. "Post Development Approval Inspections of MO Developments", paper prepared for LCC Meeting 18/7/95, p.1

²⁴ SR, p.6

Whilst the regularisation of illegal developments may have been an unstated reason for SEPP 15's introduction, nowhere is it to be found in the Aims and Objectives of the Policy and it does not therefore come within the Review's terms of reference. What is more there is no evidence that MO's contain proportionally more illegal dwellings than any other form of rural residential development. Indeed the most recent evidence from LCC Planning Officer Malcolm Scott,²⁵ demonstrates that there are few illegal dwellings on LCC MO's. Purdons' themselves report, "a high degree of regularisation of MO's under the new Policy"²⁶. There again Purdons have omitted evidence, used incomplete and faulty evidence and drawn invalid conclusions from it.

In their Councils survey Purdons asked, "Is Council satisfied that in comparison with other rural residential developments, MO developments adequately contribute towards the cost of funding services and infrastructure?"²⁷. This arguably leading question was answered affirmatively by 52% of Councils, though only 11 Councils out of 67 replied. Thus there is no warrant for the Summary judgement, "that the treatment of MO's in relation to rural residential developments is not equitable,"²⁸.

As to the issue of Council rates, although Purdon's claim that MO's, "don't pay their way in terms of Council rates," the evidence does not bear them out. The Dept. of Local Government's current "Council Rating and Revenue Raising Manual" states that dwellings on MO's are rated in the same way as second houses ("workers cottages") on other rural properties. The Manual lists common criteria for determination of whether separate valuations should be made where there is more than one building on a property and points out that a Council is already able, under the Valuation of Land Act 19 NSW, S.17, "to apply for separate valuations to be provided by the Valuer General"²⁹. Research by LCC Councillor Diana Roberts³⁰ indicates that over 1/3 of MO dwellers pay more in rates than the average village dweller, despite getting less access to Council facilities and services and despite providing community services themselves. Even Purdon's Summary Report concludes that there is, "no reason why MO's should be treated differently to other forms of rural development in relation to.....revenue collection,"³¹ whilst only 8 Councils (of 67) felt "dissatisfied with current rating arrangements and for levels of contribution being collected,"³².

Although the Summary claims that, "Considerable time and resources are directed into this type of development,"³³ only 39% of their Council sample - ie. 9 Councils out of 67 or 13% of all applicable Councils thought that, compared with

²⁵ in Blackford, op, cit, p.3

²⁶ v.1, p.13, 2.2.1

²⁷ Q. 32

²⁸ SR, p.6

²⁹ Par, 9.6

³⁰ Media Release 2/8/94

³¹ SR, p.13

³² v.1, p.B19, 2.2.1

³³ SR,p.6

other rural residential/living development applications, the level of Council resources taken up in the determination of each MO development application was average or more than average. Hence, on both sets of figures, MO DA's actually require LESS than average Council resources³⁴.

There is no ground whatsoever for Purdon's assertion that there is little local control over MO development,"³⁵ for no question was asked in the Councils survey and no such comment was made by any of those listed as having been consulted. Given that local Councils have the same control over MO's under the EP&A Act as they do for all other forms of rural residential development, any lack of control relates to Councils' implementation of the Act and the Policy, not to any lack of power.

Another justification for SEPP 15 repeal appears to be that, "Despite the large degree of acceptance by both Council and MO residents of the objectives, Councils indicated that they were largely not being achieved by MO developments in their area,"³⁶. Whilst it has been pointed out above that it is invalid to base any firm conclusions on such flawed methodology and that it is invalid to generalise from a sample of 15 out of 64 Councils, the results to questions 12 and 14 demonstrate that the responding Councils did not believe MO's were unsuccessful in achieving any of the Policy's objectives³⁷ except "facilitation of clustered style rural development" and "minimisation of demand on Council/Government services."

It should be noted that it is questionable whether those Council staff answering the Council's questionnaires were in any position to judge MOs' levels of achievement of Policy objectives and also that MO residents were not asked. Moreover not all of the Policy's aims and objectives need to be attained by each MO.

Water Quality and Effluent Disposal

The Purdon Report produces almost no evidence to support its proposition "that there are areas of concern in relation to water quality.....and.....effluent disposal (which) is a major concern in terms of the potential impact on water resources,"³⁸. When the issues were raised in Q. 20 of the Councils survey, just 14% of Councils named "poor solid waste disposal practices" as a disadvantage of MO development. Among the public authorities consulted only the Casino office of the Soil Conservation Service (SCS), distinguished by its consistent antagonism to MO's, and the Sydney and South Coast offices of the Dept. of Water Resources (DWR), mentioned water quality or effluent as a problem on MO's. The DWR admitted they "had virtually no experience with multiple occupancies to

³⁴ v.1, p.B12, 2.12

³⁵ SR, p.6

³⁶ SR, p.7

³⁷ v.1, p.B:8

³⁸ SR, p.11

date,"³⁹ and thus their concerns were based on theoretical considerations. The SCS, on the other hand was reported as experiencing, "Major concerns of soil erosion and sediment movement, sewage effluent and solid waste disposal,"⁴⁰. However, "The majority of problem sites have in the Dept's. experience been illegal developments"⁴¹ and so such problems can't be attributed to any failure of SEPP 15. In fact a reading of the SCS comments in full suggests that they are referring to "potential" rather than actual problems on MO's. It should be noted that LCC's recent inspections of all their MO's reported no problems in regard to waste quality or effluent affecting either MO's or their neighbours⁴².

When asked whether "impact on water quality" or "waste disposal" were perceived by Councils, government agencies or MO's as a concern" at or after the DA stage, 75% and 48% respectively of responding MO residents answered affirmatively in relating to the pre-DA stage of development. However, "waste disposal" was inexplicably not provided as an answer category for the post-DA stage but judging by the 24% of respondents listing "impact" or "water quality" as a "concern", such fears have proven to be illusory in practice. Moreover the wording of these questions is ambiguous as they don't allow respondents to specify whether the "concerns" are held by Council, government agencies or MO residents themselves. In perusing Table 6⁴³ and in the open ended responses to Q. 4.66, it becomes clear that almost all of these concerns (from only 8 MO's), relate not to the impact of MO's on water quality but to the impacts of their non-MO neighbours and upstream users,⁴⁴. Regarding waste disposal the 3 MO's responding did not see this as a problem,⁴⁵.

Apart from these references to such a problem, one MO neighbour's written submission, out of 23 received, mentioned water use and waste disposal, whilst none of the 39 people verbally consulted raised these issues as problems.

Nevertheless MO opponents in the Lismore area are known to have complained about such purported problems to the local politicians who lobbied to have the Review set up and it may seem that the consultants have adopted these complaints as fact without investigating them and in the absence of any substantial evidence emerging from their questionnaires and consultations.

Eg. the Lismore and District United Ratepayers Assoc. (LDURA), claimed in 1993 that, "it would seem a number of aspects of multiple occupancy policy are creating considerable concern for rural residents. These include the provision of an adequate water supply.....however, the greatest problem as we see it, is on site effluent disposal and this applies to rural villages and rural properties, as well

³⁹ v.1, p.C6

⁴⁰ SR, p.C2

⁴¹ *ibid.*

⁴² Blackford, *op. cit.*, p.5

⁴³ v.1., p.D17

⁴⁴ v.2.,p.2.38

⁴⁵ *op. cit.*, at 2.39

as multiple occupancies,"⁴⁶. Despite being challenged to do so at public meetings, this group and the Nimbin Ratepayers Assoc. have never provided any evidence for this assertion and the local LCC is also unaware of any such problems regarding MO's.

Again it should be noted that waste and effluent problems are not specific to MO's, as the LDURA acknowledge.

"The development of MO's in isolated rural locations significantly increases the demand for certain services, particularly roads"⁴⁷. In relation to Council rates this objection is analysed above, though it should be noted that Council rating was not part of Purdon's brief. Although this was reiterated by consultant Chris Murray during his 1 - day consultation in Lismore, rating nevertheless is discussed in the Report and used there as a justification for SEPP 15's repeal. In regard to increased demand for services this did emerge as a problem for 29% of responding Councils,⁴⁸ and 9 of 15 Councils thought that MO's were "partially unsuccessful to unsuccessful" in minimising demand for Council services,⁴⁹.

Once again the criteria used by Council staff in answering these questions are unknown and their personal knowledge of such matters is questionable, not to mention the methodological inadequacies of the question forms and sampling.

The Pan Community Council (PCC), the MO peak organisation, is unaware of any data supporting the proposition and believes that on the contrary, MO's provide many of their own community services, including internal roads, at no cost to Council or governments⁵⁰. In addition, several MO's known to the writer work on and maintain Council roads in the LCC area, (Bodhi Farm, Terania Creek, maintains Wallace Rd and Dharmananda, Rainbow and Kookaburra help maintain Terania Creek Road).

Thus there is no evidentiary basis for Purdon's assertion that MO's "significantly increase the demand for certain services" and hence this argument cannot be used to justify the repeal of SEPP 15.

Purdon's Conclusions and Recommendations

The Review put forward 4 policy options "to facilitate MO developments".⁵¹ "Option 1 [no change] was not considered a viable option because of the numerous deficiencies highlighted by the Review. These concerns arose from

⁴⁶ NS, 7/8/93

⁴⁷ SR, p.12

⁴⁸ v.1.,p.B12, 2.13

⁴⁹ v.1., p.B8, 2.9

⁵⁰ P. Hamilton, PCC, personal communication, 2/7/95

⁵¹ SR, p.16, par. 5

MO residents and Councils as well as state government agencies, and strongly supported the need for change"⁵².

As has been demonstrated in the analysis of the Summary Report above, this assertion is misleading at least and mendacious at worst and is NOT supported by evidence in the Review or elsewhere. In their own Councils survey Purdon's report that by far the largest response of responding Councils was that they want SEPP 15 retained as is or with amendments⁵³ and they admit that "the review has demonstrated basic support for MO's"⁵⁴.

Similarly, although, surprisingly, no question was asked of the MO residents as to whether SEPP 15 should be retained, it seems clear from the 6 open ended responses to Q. 67 - "Do you have any other comments regarding the effectiveness of SEPP 15.....?" - that MO's overwhelmingly want the Policy retained. Eg. "SEPP 15 is a good policy"; "SEPP 15 is generally a good instrument"; "SEPP 15 seems to cover the management of our development adequately"; "very successful"; "SEPP 15 has been useful to our group"; "Policy is in the main very effective".⁵⁵

Thus the consultants' rejection of Option 1 is quite unjustified and from their own Review appears to be the most favoured option by all significant stake holders.

Option 4

Option 4 is based on the unsubstantiated judgements "that the Policy has served its purpose at the State level, and that it is now more appropriate for MO's to be controlled by local instruments...Option 4 represents a more efficient use of State Government resources than continuation with SEPP 15"⁵⁶.

The first contention seems to derive from the previously discussed erroneous conclusion that the number of DA's under the Policy is declining and does not itself justify repeal.

The judgment that, "it is now more appropriate for MO's to be controlled by local instruments", is merely the authors' opinion as it does not emerge clearly from evidence to be found in the Review.

The same can be said for the final contention which is again unsupported by any weight of evidence in this Review or elsewhere.

⁵² SR, 2. ibid

⁵³ v. 1., p. B20, par. 2.23

⁵⁴ SR, p. 16

⁵⁵ v. 2, par. 2.42-44

⁵⁶ SR, p. 16

It is noteworthy that the consultants' preferred option in their main report was altered in their Summary Report, from "advise Councils that the Policy will cease to have effect after 2 years"⁵⁷ to, "a one month period to lodge outstanding DA's...and a further two months for processing and determination of DA's by Councils,"⁵⁸.

No reasons or evidence are presented for this significant change to Purdons' recommendations and the Review does not suggest that this is a preferred option for any of the significant stake holders.

Further it should be noted that the main report recommends, "Further consultation should be undertaken regarding outcomes, possibly in conjunction with the Local Government and Shires Assoc. and representatives of MO's. Based on this review, it is further recommended that the Department undertake the following consultation on the recommended option to enable a final decision by Government: release discussion paper (existing report on summary), liaison with Local Government and Shires Assoc., and organise regional conferences. These actions would lead to refinement of the preferred approach....Effective consultation will also encourage a general acceptance of the changes by all involved parties,"⁵⁹.

No such consultation occurred. Instead, despite the Minister's and Dept.'s assurances of community consultation prior to any changes to the Policy, SEPP 15 was repealed within a month of release of the Summary Report and the "sunset clauses" of SEPP 42 promulgated soon after.

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⁵⁷ v.1., p.55, at 4.4

⁵⁸ SR, p.16, at 1

⁵⁹ v.1., p.58, at 4.6

BIBLIOGRAPHY

Baker P. Alternative Living Environments: Some Aspects of Housing and Communal Living, Adelaide: University of Adelaide (MA Thesis) 1978

Barker S, Knox S. Multiple Occupancy Report, Lismore City Council, Lismore 1985

Barker S. Survey of Multiple Occupancy Communities (preliminary report), Lismore City Council Preliminary Report, Lismore 1985

Blackford B. Report to Section 94 Committee: Implications of the Land and Environment Court Judgement in the Anson Case for Section 94 Contribution for Rural Roads, Lismore City Council, Lismore 4/5/95

Blackford B. Post Development Approval Inspections of Multiple Occupancy Developments, Lismore City Council, Lismore 18/7/95

Brown R. (ed.) Group Title Subdivision, proceedings of the 12th Annual Planning Workshop, Regional and Town Planning Workshop, University of Queensland, Brisbane 1988

Cock P. Alternative Australia, Quartet, Melbourne 1979

Cock P. 'The Rainbow Region: Centre of the Alternative Rainbow' Current Affairs Bulletin, (Feb), 16 - 22 1982

Conservation and Land Management, NSW Dept. of, An Introduction to the Community Titles Legislation, Sydney, Oct 1992

Cuming P. Multiple Occupancy of Rural Land: Clarence Valley Study, Nymboida Shire Council, MacLean 1985

Environment and Planning, NSW Dept. of, North Coast Regional Environmental Plan 1988, Sydney, 18/12/87

Gladstone P. and Cock P. Sustainable Community Settlement Society, feasibility study, Ministry of Housing, Victoria, Melbourne 1984

Hamilton P. (ed.) How to Play the Planning Game: Being Guidelines for the preparation of a Multiple development application in NSW, Home Builders Association (Rainbow Region), Nimbin 1983

Harbord G.A. The Baby and the Bathwater, paper based on lecture to SA Institute of Technology, Adelaide, September 1988

Hawke R. 'Generating Employment - Options for Government' Society for Social Responsibility in Science When Machines Replace People, 51 - 57 Kirk J. (ed), Canberra 1981

Hill A. Community Participation in Roadworks, unpublished paper, 1994

Hood N. 'Rural Communities - A New Way' Simply Living, 2(8), 110 - 114, 1985

Horne D. Time of Hope: Australia 1966-72, Angus and Robertson, Sydney 1980

Kohn P. Group Title Applicability for Rural Community Living, B. Sc. Hons. Thesis, Griffith University, Brisbane 1994

Land Commission of New South Wales Multiple Occupancy Development: Feasibility Study, Land commission of NSW, Sydney 1984

Leggett D. 'Building Communities that Work' Angus and Robertson Green Politics in Australia, 219 - 229 Hutton D. (ed), Sydney 1987

Lismore City Council Planning Services Report: Multiple Occupancy, Lismore 7/9/93

Lismore City Council Discussion Paper on Multiple Occupancy, Lismore 1994

Lismore City Council Development Control Plan No. 20: Multiple Occupancy of Rural Lands, Lismore, July 1994

Lismore City Council Development control Plan No. 30: Rural Residential Subdivision and Detached Dual Occupancy, Lismore 13/1/95

Lismore City Council Lismore Local Environmental Plan 1992, As Amended, Lismore 21/2/95

Lismore City Council LEP Amendment No. 26: Community Title Subdivision of Multiple Occupancy Developments, Lismore 4/5/95

Local Government, NSW Dept. of, Council Rating and Revenue Raising Manual, Sydney, May 1995

McLeod G. Rural Resettlement in Multiple Occupancy Communities, unpublished paper, Perth, May 1986

Metcalf W. Dropping Out and Staying In, Griffith University (Phd thesis), Brisbane 1987

Mowbray M. Where Cultures Clash, Local Government powers prop reaction, in Royal Australian Planning Institute Journal, Sydney, May 1980

Munro-Clark M. Communes in Rural Australia, Hale and Iremonger, Sydney 1986

NSW Dept. of Environment & Planning Multiple Occupancy of Rural Land, NSW Department of Environment and Planning State Environmental Planning Policy 15, Sydney 1988

Paterson IG., Kirkham D., Gilmore K. The Changing Rural Environment: A study of Rural Retreats. New Lifestyles...., University of Tasmania Environmental Studies Occasional Papers 6, Hobart 1978

Planning, NSW Minister of, Multiple Occupancy Review, News Release, Sydney 17/1/94

Planning, NSW Minister of, Changes to Multiple Occupancy Planing, Sydney 13/10/94

Powys J., Hickey K., Brown M., Nalson J., Conflict Values, Attitudes and Objectives, University of New England Sociology Research Monograph 4, Armidale 1981

Powys J. Aspects of land Use and part Time Farming in Northern New South Wales, University of New England Sociology Research Monograph 3, Armidale 1981

Prowd A., Gittus A., Gittus D., 'Life at Tuntable Falls' Centre for Continuing Education, Australian national University Living Together: Family Patterns and Lifestyles, 130 - 135 Davis D. et al (eds), Canberra 1980

Purdon Associates P/L and Christopher M. Murray & Associates P/L, SEPP 15 Review: Multiple Occupancy of Rural Lands Volume 1 & 2, Canberra June 1994

Purdon Associates P/L, Review of Environmental Planning Policy No. 15 Multiple Occupancy of Rural Lands: Summary Report, Canberra September 1994

Rich R. 'Moora Moora Community: A success and Failure' Grass Roots, 64 (December), 12 - 14 1987

Roberts D. Lismore Councillor Explodes Myths About Multiple Occupancies, Media Release 2/8/94

Rural Resettlement Task Force RRTF Papers to Landcom Seminar, Rural Resettlement Task Force, Nimbin 19/4/85

Rural Resettlement Task Force Submission on the Draft State Environmental Planning Policy, Nimbin, 29/9/85

Rural Resettlement Task Force Commission of Inquiry into Multiple Occupancy in Tweed Shire: Submission in Reply, Nimbin 10/12/85

Schumacher E. Small is Beautiful, Abacus, London 1974

Sommerlad E.A., Dawson & Altman Rural land Sharing Communities: An Alternative Economic Model?, AGPS, Canberra 1985

Spain D. Land Tenures for Intentional Communities, unpublished paper, Nimbin n.d., c 1985

Spain D. Subdivision and Multiple Occupancy, unpublished paper, Nimbin February 1988

Sustainable Futures Planning & Design, (Cuming P.), -Rural Residential Development: A New Approach, report prepared for the NSW Dept. of Planning, Maclean NSW 1994

Taylor A Retreat or Advance: New Settlers and Alternative Lifestyles in the Rainbow Region, University of New England Research Series in Applied Geography, Armidale 1981

Technical Assistance Group Low Cost Country Home Building, NSW Dept. of Environment and Planning, Sydney May 1981

Tweed Shire Council Multiple Occupancy: Strategic Planning Report, Murwillumbah, 15/2/95

Williams S. Low Cost Rural Resettlement, Australian Rural Adjustment Unit, University of New England, Armidale 1983

Williams S. Policy Discussion Paper: Sustainable Rural Resettlement, Australian Rural Adjustment Unit, University of New England, Armidale 1984

Williams S. Sustainable Rural Resettlement: The Report, Australian Rural Adjustment Unit, University of New England, Armidale 1984

Woodward J. Multiple Occupancy Development in The Shire of Tweed, Department of Environment and Planning, Sydney 1986

Worrall D.S. The Depopulation of Terania Shire: 1939 - 1968, University of New England (Litt B thesis), Armidale 1969

Wyatt J. Multiple Occupancy: Report and Development Control Plan, Bellingen Shire Council and NSW Dept. of Housing, Sydney, September 1986

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