Urban Development Institute of Australia
New South Wales

Review of Environmental Planning and Assessment Regulation 2000 – Issues Paper – September 2017

UDIA NSW Response

November 2017

Contents

Executive Summary

The Urban Development Institute of Australia (UDIA) NSW is the leading property industry group promoting the responsible growth of this State. We have around 500 company members and more than 3,000 of their employees attend our events, sit on our committees, undertake training or are involved in the activities of the organisation on an annual basis. Our organisation is the oldest property development advocacy group in the country, having been established in 1962.

UDIA NSW welcomes the opportunity to provide a response to the Issues Paper on the Review of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulations).

UDIA NSW supports any attempt to simplify the planning system and accelerate the release of new land in the planning system.

We propose the regulation is revised to simplify stop the clock provisions, potentially removing them and providing for an additional period before a deemed refusal. We consider this can best be done in conjunction with legislative change to extend the time an applicant can appeal a deemed refusal from 6 months to 12 months. These reforms would reduce time spent in litigation, reduce appeals to the land and environment court, and provide further certainty as to the assessment process for industry and council.

To encourage consistency and transparency of the planning system we recommend standardised formats and content of DCPs and planning certificates.

UDIA supports the expansion of e-planning, we consider e-planning mechanisms have the potential to create many efficiencies in the planning system. We note, councils will require support to transition to e-planning, so the full benefits of e-planning and the planning portal can be achieved.

The EP&A Regulation should expressly restrict councils from introducing fees which are payable in relation to development applications other than those prescribed within the EP&A Regulation. We also welcome a more standardised approach to fees, and the supporting studies required for DAs and planning proposals at lodgement.

The development industry is not opposed to “paying its way” with regards to servicing the increased densities that projects generate. In this context, it supports the ‘user pays’ principle as it concerns the impact amelioration on infrastructure and public services. However, infrastructure charges need to be efficient, transparent, accountable, predictable, and equitable. We support introducing provisions to make SIC charges much more transparent and accountable when they are charged on development.

If you wish to discuss any of these matters further, please contact Sam Stone, Manager, Policy and Research, on 02 9262 1214 or sstone@udiansw.com.au.

Recommendations

UDIA NSW makes 20 Recommendations in relation to the EP&A Regulations Issues Paper.

1. Introduce a 40-day timeframe by which council must notify the applicant whether it supports a planning proposal.

2. Require councils to adopt a standard DCP with consistent formats, clauses and definitions.

3. Replacing 'stop the clock' with a one-off 30-day extension for the deemed refusal period where additional information is requested.

4. In parallel, amend the EP&A Act to extend the time an applicant can appeal to the Land and Environment Court from 6 months to 12 months of a deemed refusal of a DA.

5. Allow for the electronic lodgement of DAs.

6. Limit the ability for consent authorities to reject a DA to whether specified accompanying documents have been lodged.

7. Including a provision for a modification application to be rejected or withdrawn.

8. Local development that is permissible, complies with all development standards, and meets all the relevant development controls should not require public exhibition.

9. Enabling electronic notification for determinations.

10. Clarify definitions of 'environmentally sensitive land'.

11. That The EP&A Regulation expressly restrict councils from introducing fees which are payable in relation to development applications other than those prescribed within the EP&A Regulation.

12. EP&A Regulation should not include provisions requiring council's to have regard to VPA practice notes.

13. Require all VPAs to be exhibited on the planning portal.

14. Regulations should not introduce a requirement for councils to publish VPA policies.

15. Allow proponents to enter into a VPA for a modification, when the initial application did not include a VPA.

16. Adopt provisions to increase transparency for special infrastructure contributions.

17. Limiting the type of information to be included in planning certificates.

18. Ensure only relevant information is included on planning certificates.

19. A standard template is adopted for planning certificates.

20. NSW transitions to an electronic system for planning certificates.

About UDIA NSW

The Urban Development Institute of Australia (UDIA) NSW is the leading property industry group promoting the responsible growth of this State. We have around 500 company members and more than 3,000 of their employees attend our events, sit on our committees, undertake training or are involved in the activities of the organisation on an annual basis. Our organisation is the oldest property development advocacy group in the country, having been established in 1962.

UDIA NSW is governed by a 13-person Council that is elected annually by the membership. We have 8 policy committees that meet monthly and they actively advise the council on policy positions. UDIA NSW aims to secure the viability and sustainability of urban development for our members and therefore the communities that they create. Our policy agenda seeks to establish a roadmap for the creation of more liveable, affordable and connected cities in NSW.

Planning Instruments

UDIA NSW recommends regulatory reform to:

1. Introduce a 40-day timeframe by which council must notify the applicant whether it supports a planning proposal
2. Require councils to adopt a standard DCP with consistent formats, clauses and definitions.

Notification of determinations

We propose introducing a timeframe (e.g. 40 days) by which a council must notify the applicant whether it supports a planning proposal. Currently where the council does not support a planning proposal, clause 10A requires council to notify the applicant as soon as practicable. Where a council has not made a determination on a planning proposal after 90 days, the applicant of the planning proposal can request a pre-gateway review. If a timeframe for Council to notify of its support is introduced, a pre-gateway review could occur within a shorter timeframe.

Standard DCP

UIDA NSW supports the requirement for councils to adopt a standard DCP. Consistent formats, clauses and definitions in DCPs are likely to promote more consistent application of DCP controls by consent authorities. In addition, it will make the planning system more easily navigable and user friendly for the general-public.

This approach should support the provisions in the EP&A Act which clarify that DCPs are to be used as guidance documents to support LEPs rather than as inflexible development standards. Particularly, as Land and Environment Court judgments which consider standard DCP controls would provide guidance to councils in applying DCP controls.

Requirements for exhibition of DCPs

UDIA NSW would support the re-exhibition of a DCP where amendments following initial exhibition substantially alter the form or objectives of the draft DCP.

Application of draft documents

As many draft planning strategy documents are being produced for Greater Sydney, we recommend further clarity is provided as to the status of the draft documents is the weight ot be afforded to these documents in the development assessment process.

Development Assessment and Consent

The development assessment and consent process in NSW has become an extremely bureaucratic and unwieldy process, which unnecessarily delays in the delivery of much needed new housing in NSW.

Overall, we consider the process should be simplified and there should be more clarity of timeframes in the process, to provide certainty for industry and the community.

UDIA NSW Recommends

3. Replacing 'stop the clock' with a one-off 30-day extension for the deemed refusal period where additional information is requested.
4. In parallel, amend the EP&A Act to extend the time an applicant can appeal to the Land and Environment Court from 6 months to 12 months of a deemed refusal of a DA.
5. Allow for the electronic lodgement of DAs.
6. Limit the ability for consent authorities to reject a DA to whether specified accompanying documents have been lodged.
7. Including a provision for a modification application to be rejected or withdrawn
8. Local development that is permissible, complies with all development standards, and meets all the relevant development controls should not require public exhibition.
9. Enabling electronic notification for determinations.
10. Clarify definitions of 'environmentally sensitive land'.

Deemed Refusals and Appeals

Provisions in the EP&A Regulations regarding deemed refusal times and stop the clock provisions are overly complex which can lead to errors in calculating deemed refusal periods. Recent case law has made it more complicated when the DA is amended and the regime does not contemplate "adequacy assessments" for EIS's which confuses the calculation of days since lodgement. These provisions should have a simple calculation of days without counting for stop the clock. A one-off one month extension could be added to the deemed refusal period in the event that council requests additional information. Councils should still be required to issue requests for additional information in 14 days. It is not uncommon for a council to issue multiple requests and sometimes months after lodgement which can lead to significant extensions to the timing for a deemed refusal right arising.

The deemed refusal periods are currently 40 days, 60 days and 90 days depending on the type of development. Those periods are varied by the council requesting further information and stopping the clock. Often a detailed analysis has to be undertaken to establish whether an applicant can appeal against a deemed refusal. There are instances of councils seeking to strike out proceedings on the basis that they were commenced out of time and applicants having to use legal gymnastics to establish that they are within time.

The provisions relating to the counting of days and stopping-the-clock are set out in clauses 54, 106, 109 to 113 of the EP&A Regulation 2000.

See the cases of the Land and Environment Court in: Ipoh Pty Limited v Sydney City Council [2005] NSWLEC 514 (clock restarts if application is amended); Corbett Constructions P/L v Wollondilly Shire Council [2017] NSWLEC 135 (does not providing the required information mean that the clock restarts after the deadline); Mitchell Group Pty Limited v Baulkham Hills Shire Council [2004] NSWLEC 113 (whether the stop the clock letter arrived out of time).

We know from data published by the Department of Planning and Environment in 2014-15 that almost all development (95%) is determined within 46 days from when the application is lodged. We know

that only a small proportion of applicants appeal (less than 1%) and that most try and work through issues with the council to resolve matters.

Amending the EP&A Regulation so that a development application will be deemed refused after 60 days for all development other than State significant development (90 days) with no ability to stop the clock would simplify the regulation and make interpretation easier for applicants and consent authorities. If a council does not receive the necessary information to determine a DA it is open to it to refuse the application (again only 3% of applications are refused).

Although contained in section 97 of the EP&A Act (rather than the EP&A Regulation), an amendment to the EP&A Act should be made to increase the time during which an applicant can commence an appeal to the Land and Environment Court from 6 months to 12 months from the date of a refusal or deemed refusal of a DA. If the appeal period is extended to 12 months, applicants may be less likely to rush to file an appeal to preserve an appeal right when Council has not determined a DA within 6 months of the deemed refusal right arising. This amendment may result in fewer appeals to the Land and Environment Court and reduced cost to developers who consider that they have no choice but to commence an appeal to preserve an appeal right or to risk further delay in the event that Council does not issue a notice of determination within a reasonable time after the 6 month appeal period. Increasing the appeal period to 12 months would also reduce costs to councils in briefing lawyers and diversion of council's resources in responding to appeals.

DA Lodgement

UDIA NSW supports enabling electronic lodgement of DAs, supported by a short timeframe by which a Council can reject a DA that does not meet the requirements. The requirements for rejection should be limited to whether specific documents have been lodged not the adequacy of the documentation.

Electronic lodgement of DAs is supported including a short timeframe (such as the existing 14 days) by which a Council can reject a DA that does not meet the requirements of the EP&A Regulation. UDIA NSW supports extending provisions for the rejection of DAs which do not meet requirements to modification applications in addition to development applications.

The requirements for rejection should be limited to whether specific documents have been lodged rather than the adequacy of the content.

Public Exhibition Requirements

It should be clear what exhibition requirements are for all forms of development applications. UDIA NSW would welcome exhibition requirements being clarified and consolidated.

Local development that is permissible, complies with all development standards and meets all the relevant development controls should not require public exhibition. Requiring exhibition for compliant development defeats the purpose of consulting on the content of the LEP and DCP as it duplicates the consultation process. The community has already had a say on what type of development and standards are considered acceptable in an area, and a development application that complies with all the standards should not need to be exhibited. Rather, the community should be notified that the development application has been lodged.

E-Planning and Development Applications

UDIA NSW supports the further development and improvements of the planning portal. We generally support electronic notification and to allowing notice via email. We consider online public notice of consents on Council or Department's website, or through the planning portal would provide a 'one stop shop' for planning consents.

DA documents should be required to be made available for inspection electronically. We consider this will improve engagement with the exhibition process, as it reflects how most in the community are able to access the documents. Inspection of documents relevant to interpreting a DA should be on the Council website and required as well as the DA and its conditions. Many councils still do not have a complete DA register and require a GIPA application in order for the public to access DA documents rather than the register being online. This is a significant barrier that E-Planning will help resolve.

Whilst UDIA NSW supports the greater provision of information on the planning portal, such as provision of development consents, Councils have been required to have DA registers for over 20 years and many still do not have searchable electronic records of their own, let alone a consistent state-wide format that could work with the planning portal. Councils will need substantial time to adopt the State technical requirements, and development authorised by consents should not be delayed during the transition. Councils need to be incentivised with resources, these incentives should be linked to KPI's and penalties imposed for non-compliance.

Environmental Assessment

UDIA NSW supports requiring public agencies to make their environmental assessments publicly available. This will increase transparency in the planning system and provide certainty to the community that appropriate environmental considerations have been made.

Fees and Charges

UDIA NSW recommends

11. The EP&A Regulation expressly restrict councils from introducing fees which are payable in relation to development applications other than those prescribed within the EP&A Regulation.

DA Fees

The EP&A Regulation should expressly restrict councils from introducing fees which are payable in relation to development applications other than those prescribed within the EP&A Regulation. UDIA understands that some fees have been introduced in the form of "enforcement fees" (such as Liverpool Council's 'compliance levy') and fees for additional FSR (such as in Ryde). Charging fees for additional yield is improper, undermines planning controls and merit assessment and is an affront to the integrity of the planning system. Any payment to a consent authority outside of the context of the prescribed fees in the EP&A Regulation, the development contributions regime or a voluntary planning agreement may give rise to a perception of bias.

While some of these fees may go toward merited council activities, it is not reasonable to use the lodgement of a DA to fund a broad array of local government activities such as fostering neighbourhood pride, advocating to the federal and state government and protecting the environment.

Liverpool Compliance Levy

The Liverpool Council introduced a 'Compliance Levy' on Development Applications from 1 January 2016.

The levy is 0.025% of the Capital Investment Value of a proposed development to be charged on each development application.

This levy is paid at the time of lodgement of the Development Application under provisions of Section 608 of the Local Government Act and provisions falling within Clause 246A (2) of the EP&A Regulation.

The Levy is used to fund objective such as

- Enhance the environmental performance of buildings and homes.
- Manage the environmental health of waterways.
- Manage air, water, noise, and chemical pollution.
- Raise community awareness and support action in relation to environmental issues.
- Raise awareness in the community about the available services and facilities.
- Support polices and plans that prevent crime.
- Support access and services for people with a disability.
- Deliver high quality services for children and their families.
- Foster neighbourhood pride and a sense of responsibility.
- Actively advocate for federal and state government support, funding and services.

These objectives, whilst virtuous, should be funded out of revenue from a Council's rate base. They should not be piggybacking on development as a revenue raising mechanism to support/subsidise Councils' recurrent expenditure requirements.

Development Contributions

UDIA NSW supports an efficient, transparent, accountable, predictable and equitable development contribution system in NSW. UDIA NSW recommends:

12. EP&A Regulation should not include provisions requiring council's to have regard to VPA practice notes.
13. Require all VPAs to be exhibited on the planning portal
14. Regulations should not introduce a requirement for councils to publish VPA policies.
15. Allow proponents to enter into a VPA for a modification, when the initial application did not include a VPA.
16. Adopt provisions to increase transparency for special infrastructure contributions.

Practice Notes for VPAs

UDIA NSW is not in favour of introducing provisions to the EP&A Regulation to require regard to be had to VPA practice notes.

Section 93F of the EP&A Act requires VPAs to address specific requirements. Due to the bespoke nature of some contributions to be provided under a VPA, a practice note is unlikely to provide sufficient flexibility and may not be complied with in all circumstances. Given the existing provisions in the EP&A Act and Regulation, the introduction of practice notes for VPAs and giving those practice notes statutory weight by inserting provisions in the EP&A Regulation to require VPAs to have regard to or to comply with the practice note is not supported. If this change was introduced, it may lead to increased administrative law challenges on the basis that VPAs have not been complied with.

Further, an additional practice note is unnecessary given the existing provisions of the EP&A Act and Regulation.

If the intention is to require explanatory notes to be written in plain English, that provision alone could be placed in the regulation or a ministerial direction.

Public inspection of draft and final planning agreements

We support requiring all draft and final planning agreements to be exhibited on the Planning Portal. We agree this will improve accessibility and transparency of VPAs.

Council Policies on VPAs

UDIA NSW opposes requirements to introduce a requirement for planning authorities to publish policies and procedures to guide and explain their use of VPAs. Council VPA policies, by setting out circumstances Council's may enter into a VPA – often also include 'betterment levies' or 'planning gain', which act as a tax on development and remove the voluntary aspect of a VPA.

For example, the City of Parramatta Council's draft VPA policy introduced a 50% 'value sharing' tax on the uplift of planning proposals in the LGA. This would undermine the voluntary nature of a planning agreement and serve as a tax on development. Additional taxes and charges on development, particularly when not linked to infrastructure will restrict housing supply and worsen housing affordability.

If Councils are to have VPA policies they should not set out specific value capture mechanisms, rather the broad principles underpinning a VPA, similar to those contained in the existing VPA Practice Note. An additional policy is not required.

Extend the use of VPAs

UDIA NSW encourages consideration to allow proponents to enter into a VPA for a modification in addition to a development consent.

Special Infrastructure Contributions

UDIA NSW supports development paying for a reasonable portion of infrastructure, where nexus exists. However, when paying contributions, it is reasonable to expect a transparent accounting system, where it is clearly identifiable if the contributions have been spent on the required spending. Currently, there is very limited transparency relating to expenditure of the SIC.

Department of Planning Reporting of the SIC

In the 2015/16 Annual Report the Department of Planning identified:

During 2015-16, $70.8 million in Special Infrastructure Contributions was collected from approximately 350 hectares of developed land supporting the development of approximately 5,000 new homes. $30.4 million of this infrastructure was delivered by industry as works-in-kind, including the part construction of Badgally Road and upgrades to The Northern Road at Oran Park and Richmond Road at Marsden Park.

In the North West, the Special Infrastructure Contribution funded the planning and design of construction for Hambledon Road, Boundary Road and McCulloch Street.
As well as funding regional infrastructure, these contributions allowed the Department to assist local government to deliver infrastructure. In 2015-16 the following grants were provided:

- *$5 million to Blacktown City Council for Hambledon Rd Land Acquisition; and*
- *$5 million to Blacktown City Council for Land Acquisition and Construction of Stage 1 Boundary Road and McCulloch Street.*

The Special Infrastructure Contributions scheme also plays an important role in maintaining the balance between the need for economic growth and caring for the environment, providing $3.8 million in funding of Biodiversity Offsets in 2015-16

SIC/VPA grants:		
Special Infrastructure Contributions grants - Works-in-kind	24,470	43,71
Special Infrastructure Contributions grants - Cash	9,090	-
Voluntary Planning Agreements grants - Works-in-kind	-	7,20
Infrastructure Funding Agreement for Liz Kernohan Drive, Spring Farm	7,500	8,55
Biodiversity Certificate Offset program	3,851	1,91
	44,911	61,38

P.107

3(g) Other revenue

	2016 $'000	2015 $'000
Special Infrastructure Contributions (SIC):		
• Cash	70,809	42,901
• Works-in-kind	30,463	37,139
Developer Contributions - Voluntary Planning Agreements		
• Cash	13,069	7,970
• Works-in-kind	-	8,009
Administrative fee recovered from NSW government agencies	2,404	2,567
Other revenue	3,264	4,077
	120,009	102,663

P108

UDIA NSW considers this insufficient as it is unclear where the remaining $40.4 million collected was spent or what specific items it contributed to. We recommend as a starting point reporting on the SIC is modelled on Section 94 reporting, although we believe there is greater opportunities for transparency. Particularly, if the Department were to develop an Urban Development Program, which

clearly laid out infrastructure requirements and prioritised infrastructure as recommended in UDIA NSW's *Make Housing More Affordable* report (attached).

Currently, VPAs are more trusted in the industry as there is a clear nexus between the contribution and infrastructure servicing the development, new regulations should help provide the transparency that currently exists in the VPA system.

Planning Certificates

UDIA NSW recognises the importance of planning certificates within the planning system to show the 'true status' of the land. Matters that have been required to be included in s149 certificates has expanded over time. In 2010 it was estimated 206,000 planning certificates are issued each year. The revenue from the sale of planning certificates is around $11 million per year. The fee for a 149(2) certificate is $53 and for a 149(5) is $80. Some councils charge additional or expedition fees that vary between $90-205.

UDIA NSW Recommends

17. Limiting the type of information to be included in planning certificates
18. Ensure only relevant information is included on planning certificates
19. A standard template is adopted for planning certificates
20. NSW transitions to an electronic system for planning certificates

Information to be included in planning certificates

UDIA NSW considers information to be prescribed as part of the planning certificate should be limited to information necessary to make informed purchasing decisions of the site. The information should be provided in an easily accessible format. There are known instances of councils attaching the entire LEP and DCP to the planning certificate, which does not assist a purchaser identify controls.

We consider the type of information to be included on a 149(2) certificate should be limited to include only:

General	Property Address
	Property Description
	Name of Applicant
	Certificate Reference
	Date of Issue
Planning controls	Names of relevant EPIs and DCPs
	Any proposed EPIs
	Zoning and land under relevant EPI
	Exempt and complying development
	Items of environmental heritage
	Items listed on the State Heritage Register
	Heritage Conservation Areas
Risks	Flood Related development controls
	Bushfire prone land
	Aircraft noise
	Land slip
	Tidal inundation
Development Contributions	Contributions plans
	Special Contributions Areas

As part of certificates, indicating the SEPP is insufficient to be useful, any available mapping should be part of the certificate. As provided in other states we would recommend including DAs or CDCs issued in the last 5 years be added to a planning certificate.

Format of a planning certificate

UDIA NSW would prefer to see the Planning Certificate process streamlined. It currently takes at least 3 days to receive a planning certificate, without paying expedition fees. This process encourages applicants to pay expedition fees to accelerate the process. The planning system should be responsive to the needs of the community and provide information in a fast, responsive manner. Ultimately, we would like to see planning certificates replaced with an online system through the NSW Planning Portal, which would be more efficient than the current system. A standard template with standard information should be adopted as this will make it easier to transition to an electronic system.

Repeal of Transitional Part 3A and detail needed in the EP&A Regulation

A consultation note that was included in the *Environmental Planning and Assessment Amendment Bill 2017* (**Draft Bill**) introduced in January 2017 stated:

> *"The provisions of this Schedule* (being schedule 6A) *are being transferred to the regulations under the Act. The transferred provisions are to be amended to prevent any further modification of approvals for transitional Part 3A projects under the former Part 3A modification provisions, to enable those projects to become State significant development and State significant infrastructure and to make provision with respect to any outstanding Part 3A concept plans."*

The summary document which was released with the Draft Bill stated that the ongoing effect of approved Part 3A concept plans will be preserved but did not provide detail as to how Part 3A concept plans would be preserved.

The draft Regulations should include detail to allow public comment as to how a transitional Part 3A concept Plan will become either SSD or SSI and how these projects may be modified after the repeal of Schedule 6A of the EP&A Act. The *Environmental Planning and Assessment Amendment Bill 2017* introduced to Parliament in October proposes to repeal schedule 6A and to transfer its provisions into Schedule 2 of the *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017*.

Further detail is needed to understand how transitional Part 3A projects will become SSD or SSI and how these projects will be modified after the provisions in Schedule 6A of the EP&A Act are repealed. The Part 3A modification power which is contained in (repealed) section 75W of the EP&A Act continues to apply through transitional provisions. Section 75W provides a broad and facilitative modification power. A broader modification power than that contained within section 96 of the EP&A Act (such as the power for critical SSI contained in section 115ZI of the EP&A Act) is justified for transitional Part 3A projects as these projects are generally of larger scale and greater complexity than other developments. The Department should provide an opportunity for public comment on the proposed provisions relating to the repeal of the transitional Part 3A provisions.

Conclusion

UDIA NSW welcomes the opportunity to comment on the Review of EP&A Regulation 2000 Issues Paper.

We consider the planning system needs to be responsive to the needs of applicants, while maintaining a rigorous assessment process. We have made a series of recommendations designed to reduce delays in the planning system, simplifying the system and improving transparency for industry and the community.

Consistency and certainty are vital to the planning system, we welcome reforms that aim to provide certainty to industry and the community and are applied consistently throughout the State. UDIA welcomes the development of standardised documents and template documents (such as DCPs and Planning Certificates), which will make the planning system much more navigable across all LGAs. This will help support the transition to e-planning systems.

The 'Stop the Clock' provisions have become confusing and now create an additional hinderance, UDIA NSW recommends removing the provisions, while allowing additional assessment time if further information is required.

Fees and charges for development need to be consistent in their application across LGAs and should be restricted to those prescribed within the EP&A Regulation. Otherwise, the integrity of the planning system is undermined.

UDIA NSW supports an efficient, transparent, accountable, predictable and equitable development contribution system in NSW. We support greater transparency for special infrastructure contributions, as it is difficult to see the link between the contribution and infrastructure expenditure. We support reforms to ensure VPAs remain voluntary and an important part of the planning system.

The repeal of transitional Part 3A measures needs to be carefully considered, detail is needed to understand how transitional Part 3A projects will become SSD or SSI and how these projects will be modified after the provisions in Schedule 6A of the EP&A Act are repealed. The Department should provide an opportunity for public comment on the proposed provisions relating to the repeal of the transitional Part 3A provisions.

If you wish to discuss any of these matters further, please contact Sam Stone, Manager, Policy and Research, on 02 9262 1214 or sstone@udiansw.com.au.