

SYDNEY: MOVING FORWARD



*Celebrating
50 years*



UDIA NSW Response to the **Draft Metropolitan Strategy for Sydney**

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EXECUTIVE SUMMARY

The importance of preparing a strategic plan for Sydney that can guide public and private sector investment in infrastructure, services, homes and employment cannot be understated.

In Australian and other international cities where strategic planning has been consistently implemented over time, residents enjoy a better quality of life, higher amenity and more convenient access to homes, services, transport and employment. Importantly, Local and State Governments in these cities are able to provide efficient delivery of, and cost effective investment in, public services and infrastructure. To achieve this, a strategic plan must have a clear vision of what the plan aims to achieve within a given timeframe(s), objectives to guide how a region will grow; mechanisms and initiatives that will be used to deliver that growth; and a clear review process that allows for periodic renewal.

Over the past decade, Sydney has failed to deliver the required housing and jobs, and the associated infrastructure. The Draft Metropolitan Strategy for Sydney 2013 (the Strategy) clearly highlights the challenges that Sydney is facing over the next 20 years. The Strategy clearly identifies the type of city Sydney will need to be if it is to accommodate the forecast growth and to compete on a regional and global scale.

UDIA NSW believes that strategic land use planning must link planning for growth directly to planning for infrastructure provision. The Strategy recognises this and the need for infrastructure delivered in a timely manner to support growth. UDIA NSW believes this is where this Strategy greatly improves on previous strategies and plans and can potentially impact on the delivery of the Strategy's objectives. The identification of city shapers and the Urban Activation Precincts sends a clear message to both the market and the wider community about the intentions of Government as it seeks to address the identified planning challenges facing Sydney.

The Strategy importantly recognises that the failure to meet growth targets is costing the State economic growth and revenue, depriving future generations of home buyers of enough affordable housing, and failing to provide the infrastructure and jobs where and when they are needed.

The Strategy provides a positive framework for the future growth of the region. The structure of the document and the focus on the five key outcomes of *Balanced Growth; A Liveable City; Productivity and Prosperity; Healthy and Resilient Environment; and Accessibility and Connectivity* should be applauded.

With the recent release of the White Paper in to the new planning system, it is clear that this Metropolitan Strategy Sydney is central to its future direction and as a result must be clear on how Sydney will be able to cater for future growth.

INTRODUCTION

The Strategy shows the Government is heading in the right direction by focusing on the delivery of housing, infrastructure and jobs. The Strategy contains a raft of positive policies that provide direction. Further, the Strategy comprises a series of minimum targets and specific thresholds capable of benchmarking and (re)assessment against delivery, during future reviews.

It is positive to see that the Strategy speaks to the State Plan NSW 2021 (the State Plan), the NSW Long Term Transport Master Plan (LTTMP) and the State Infrastructure Strategy (SIS). This Strategy must be fully integrated with these plans and a delivery framework that will ensure that the community benefits from growth.

It is particularly encouraging that the Strategy places emphasis on developing centres, both in greenfield and infill areas, and moves away from an overly prescriptive greenfield/infill “split”. The extension of the global economic arc to Parramatta and north along the North West Rail link are positive moves that will provide a tangible link between the centres along the arc.

The Urban Activation Precincts (UAPs) and ‘city shapers’ provide a strong signal to the industry and community that the Government continues to support urban consolidation, and if successful will create well located, accessible hubs of employment, housing and leisure.

However, we have identified key areas where the strategy must offer greater detail and clarification to ensure a robust strategy is produced and the future of the region is made clear.

To address these issues, more than 200 of the industry’s leading developers and practitioners have been directly involved in the preparation of UDIA NSW’s response to the Strategy.

The paper is arranged in seven sections that we see are vital to the success of the Draft Strategy. They are:

1. What’s behind a plan
2. Balancing growth
3. Investing in infrastructure
4. Balancing the environment and urban growth
5. Planning for jobs
6. Monitoring success
7. It’s all about delivery

For the purposes of being constructive and concise, this paper's recommendation cover only the points of most relevance to the success of the Metropolitan Strategy for Sydney 2013, as we see it, and proposes solutions where there is currently a lack of clarity. Where there is no comment, the reader can assume that the Strategy is supported by UDIA NSW or that it is considered to be of lesser consequence to the success of the strategy.

1 WHAT'S BEHIND A PLAN?

There is a fundamental and pressing need for a robust and credible strategic planning document to manage Sydney's growth. Sydney's first strategic plan was the County of Cumberland Plan, which was released in 1948. Since then, Sydney has prepared seven strategic plans that have attempted to influence the future direction of the region.

However, where many previous metropolitan plans, as well as this Strategy, have fundamentally failed is in the comprehensive review and evaluation of previous plans. While there have no doubt been evaluations of the successes and failures of every plan and strategy to varying degrees of depth and analysis, the results have seldom been publicly accessible.

The preparation of metropolitan strategies which do not take into consideration the successes or shortcomings of the previous plans and focus more exclusively on the data of the here and now may also result in planning for the future, without adequately understanding the (failed) planning of the past. This leads to structural and procedural shortcomings that have adversely impacted on the delivery of previous plans and strategies.

To ensure that the objectives of the Strategy are delivered, there is a need for continual and consistent review and renewal. The lessons of previous plans must form the narrative of how the region will move forward.

UDIA NSW contends that the NSW Government must release the information it has relied upon. This information would allow for a more informed debate about the future of Sydney.

The Portland Plan – Portland, Oregon

There are many good examples of strategic planning that shapes how a city or region grows. Portland, Oregon, is one of those areas. Like many cities in the world, Portland has adopted a strategic planning approach to planning for the future growth of the city.

As part of the review process of the Portland Plan, audits of previous plans policies and objectives were undertaken. The audits have identified which policies have succeeded in bringing on positive change and where improvements were necessary. In addition, detailed information on key areas such as economic development, housing, and infrastructure. This information is available for residents, industry and investors to access.

Releasing this information promotes a transparent strategic planning process, where the evidence for decisions made is easily accessible. This also allows for robust debate among the community and stakeholders based on facts and a clear direction of where the city needs to move if it is to prosper.

2 BALANCING GROWTH

Western Sydney will need to accommodate at least half of the future population growth forecast for the Sydney region. The Strategy highlights that Western Sydney will need to cater for over half of Sydney's new homes and jobs, and an enormous infrastructure works program to accommodate that growth.

UDIA NSW generally supports the initiatives highlighted in the Strategy, including the UAPs, planning along the North West Rail Link corridor, extension of the global economic arc and the Parramatta Road Corridor.

However, UDIA NSW is concerned with the lack of focus on areas west of the Parramatta CBD and south of Parramatta Road. And while the regional centres of Liverpool and Penrith are identified, very little detail is given about how the Government plans to ensure that these centres develop into hubs of employment, residential, retail and leisure activities, linked to good transport. We do note, however, that the Government has also recently made significant announcements about additional employment land in the Broader Western Sydney Employment Area.

To ensure that the residents of Sydney have equitable access to employment opportunities and affordable housing, a more balanced approach to the structure of the Sydney region is necessary.

UDIA NSW believes that there are opportunities for the NSW Government to investigate balanced growth in western Sydney, including:

- The potential to extend the global economic arc from Parramatta to Liverpool. This would promote growth along the Cumberland rail corridor.
- The potential of the East Hills/Airport rail corridor to accommodate future housing and jobs growth. The East Hills/Airport rail corridor has direct access to Sydney Airport and is in close proximity to Bankstown Airport, putting this corridor in a position that could potentially target jobs in industries associated with aviation.

Housing and Employment Targets

UDIA NSW commends the NSW Government on the inclusion of ambitious housing and employment targets for the Sydney region. The achievement of these targets will ensure that Sydney is able to accommodate the growth in the future.

The housing and employment targets for each of the subregions are also welcomed. However, there is no indication on the basis for the proposed minimum targets and whether the subregions can in fact accommodate the proposed targets – or potentially receive additional growth. For housing targets, it is unclear how they align to the targets in the Metropolitan Development Program (MDP); whether or not they are reflective of market demand; and if they take into account infrastructure capacity and availability.

Conversely, there is no indication on what the employment figures are based on. The targets refer to strategic centres and specialised centres, however there seems to be no clear relationship with the Employment Lands Development Plan (ELDP). UDIA NSW believes that the ELDP should be expanded to include all areas within the Sydney Metropolitan Area. The ELDP should incorporate major sites across greenfield and infill areas, industrial, commercial and retail uses and also include business parks to better identify where the opportunities are.

3 INVESTING IN INFRASTRUCTURE

Sydney cannot maintain its global city status unless it comes to grips with the obvious infrastructure imperatives. A key missing ingredient in effective or timely infrastructure delivery is sufficient funding. The infrastructure backlog is so large and resources so constrained that it is difficult to effectively plan for the infrastructure needs of new developments.

Transport infrastructure

The under-provision of public transport infrastructure and indefinitely deferred commitments have undermined previous metropolitan strategies that were designed to underpin and support population growth and the provision of housing and employment opportunities. This has perpetuated underlying social inequities with regard to access to transport, and has created new problems where the provision of new communities have not been supported by promised investment in public transport infrastructure.

The Strategy rightly identifies that accessibility in Sydney needs to be improved if Sydney is to maintain its status as a global city. The Strategy is better aligned with the LTTMP and recognises the same strategic transport corridors and future corridors as the SIS. However, UDIA NSW is concerned that the Strategy does not go far enough in ensuring that the future growth of the region will be met with the timely delivery of transport infrastructure and services, particularly to employment centres.

The actions contained within the Strategy do not instil confidence that this will occur, particularly with disparate delivery timeframes of transport infrastructure agencies and the lack of connection with funding. The delivery of transport infrastructure and services must also be supported by a highly robust funding framework that programs the delivery of infrastructure in line with future land use.

UDIA NSW recommends that more stringent timeframes must be set for the delivery of infrastructure as well as explicitly outlining how future land use will be supported by initiatives within the LTTMP and SIS.

Infrastructure financing alternatives

The infrastructure funding context in NSW, as it relates to urban development, has evolved significantly in the last 20 years. The dominant trend has been an increased reliance on state infrastructure levies paid by the initial home buyer in greenfield development to fund multi-generational infrastructure. At the same time, local infrastructure levies (section 94) have increased sharply. Continual changes to the levy structure have had demonstrably negative impacts on housing supply and affordability, and intergenerational and geographical equity.

UDIA NSW contends that ways of financing new infrastructure must be explored that involve both public and private sectors. The recently released White Paper into the planning system highlights a new framework for infrastructure financing. However, UDIA NSW is concerned that the new system may not be equitable or able to deliver more funds for infrastructure delivery, impacting on the achievement of many of the Strategy's objectives.

Infrastructure identified in the Strategy, LTTMP and SIS must be aligned to be delivered when it is required. Additionally, the cost of providing the infrastructure must be more equitably spread and focused towards the delivery of key projects. In this regard, UDIA NSW contends that further investigation into alternative funding frameworks is needed if the Strategy is to achieve even some of its most basic targets. Growth Infrastructure Plans will be central to ensuring this happens, and they need to be adequately resourced, robustly prepared and closely monitored.

Infrastructure programming and delivery

The timely provision of infrastructure to support growth is critical to the delivery of a Metropolitan Strategy. This is particularly relevant for greenfield development, where there is little or no existing infrastructure and public investment and participation is needed to help unlock land for development.

Some government agencies that are better than others at programming infrastructure to support and facilitate development. Sydney Water Corporation's Growth Servicing Plans align capital expenditure programs with the land release program, and provides a level of certainty for investment by developers. This program is clear, transparent and is strongly supported by UDIA NSW.

UDIA NSW recommends that all key infrastructure agencies be required to produce growth servicing plans for capital investment to support the Metropolitan Strategy. The agencies should utilise the Metropolitan Development Program (MDP) to understand when and where development and growth will occur and align their capital programs accordingly.

Protecting corridors

The Strategy identifies potential future corridors, including the M9 Outer Orbital, WestConnex and a number of transit corridors in western Sydney. These transport corridors can play a vital role in the movement of traffic around the Sydney region and also improve transport options in areas where there is insufficient service.

UDIA NSW contends that the NSW Government must commence investigations on the actual alignment of the identified corridors with a view to rezoning, protecting and acquiring land immediately. UDIA NSW believes that the future growth, vitality and liveability of the region could be jeopardized if these corridors are not adequately protected to accommodate expansion of the transportation network.

4 BALANCING THE ENVIRONMENT AND URBAN GROWTH

The Sydney Metropolitan area comprises significant and comparatively well protected environmental assets. The urban footprint is encircled by national parks and waterways that enjoy a high degree of protection with minimal disturbance by human activity. Few “capital” cities enjoy this context.

UDIA NSW recognises the value of the environment. The strategy provides an opportunity to shape the region and ensure that key areas of ecologically significant vegetation are maintained, risk from natural hazards is mitigated and green links are established through the region.

UDIA NSW also supports the dedication and acquisition of high-value land for permanent conservation and an increase in green spaces like Western Sydney Parklands. However, the Strategy must provide greater clarity on where these areas may potentially be. There needs to be greater detail on the options, processes and timeframes for acquisition, ownership and long term maintenance.

UDIA NSW is concerned that if the issues that arise when urban development meets the environment are not identified and dealt with at a regional and subregional level, there is a danger that the housing targets will not be met. Greater pressure and negative impacts will also be placed on the environment.

Initiatives such as decentralised energy has multiple benefits, including reducing peak demand and loads on already struggling infrastructure, and reducing greenhouse gas emissions. These can also build greater resilience against climate impacts and blackouts during peak periods. However, there are major barriers around governance and management which need to be tackled, otherwise there is the risk that very little will happen.

The Strategy does not adequately recognise links between positive health outcomes and the urban environment. With the region’s population set to grow, greater importance needs to be placed on the urban structure and infrastructure, and how opportunities for better outcomes in areas such as air and water quality can benefit.

To practically achieve outcomes it is necessary to develop cascading outcomes that clearly identify the State’s goals and articulate this to all levels of the plan making process. Clearly identified and attainable goals will enable subregional and local plans to contribute to the achievement of the broader goals. This would also enable more robust performance measuring that can identify potential areas of improvement.

There are also issues that are not raised in the strategy, such as waste management. Past strategies have identified waste management as a major issue for the Sydney region, with options such as localised or regional landfills being considered as well as waste minimisations strategies. UDIA NSW believes this is an issue that needs to be considered, particularly as the region grows.

Overall, UDIA NSW considers the Strategy to be particularly weak in its actions on the delivery of environmental objectives. While the objectives themselves are clear, the actions do not identify clearly how the objectives will be met. Without clear goals and targets, there is no call to action or direction for government, industry and community.

5 PLANNING FOR JOBS

Attracting employment in Western Sydney

The employment base of the Sydney metropolitan area comprises retail, business/commercial and industrial uses in centres, road corridors and specialised employment precincts.

One of the principal objectives of the Strategy is to provide jobs closer to home. It is vital that this objective is maintained but, more importantly, that a concerted effort is made to present employment areas outside of the Sydney CBD as an attractive investment option for employment-generating land uses.

The Strategy recognises the need to identify local, regional and national or strategic industries and other employment uses, and centres should be an important component of the Strategy. The strategy needs to provide certainty for the growth, expansion and evolution of employment areas over time.

Additionally, to achieve a balance with job opportunities closer to where people live, a significant improvement to transport infrastructure to areas and centres identified for future employment growth is required. Commitments to improving key transport infrastructure are necessary and should be part of the strategy.

Protection of centres hierarchy

The advantages of centres as agglomerations of commerce and activity have been well documented. They can:

- Accommodate a focus of businesses and services which suburban areas cannot match;
- Effectively be coordinated, promoted and marketed as an attractive destination in their own right;
- Provide an attractive, comfortable and inviting mixed-use environment as a result of gentrification and urban renewal; and
- Be easily accessed by public transport as those services are generally superior and more efficient compared to those in non-central locations.

However, the Strategy does not provide sufficient detail on how the centres that have been identified will be able to attract people, and correspondingly, investment, to a centre. Neither does it detail how land and development opportunities will be made available in the centre to accommodate that investment. This is particularly concerning for the regional centres of Penrith and Liverpool.

The Strategy needs to clearly set out the business plan that is to underpin each of the major centres – how they are to diversify to attract employers and avoid all locations fighting over the same business prospects. There are opportunities to create hubs of specific activities and business synergies in particular centres in addition to the identified specialist centres to ensure real growth and provide centres with some degree of individual character.

Centre growth

The Strategy calls for all levels of centres, both new and existing, to be identified at subregional level and that these be the location of retail, employment, cultural and social infrastructure.

Centres from Global to neighbourhood should be on public transport routes; the higher the centre is in the hierarchy, the higher the status of transport mode i.e. ranging from heavy rail to shuttle bus. Each centre needs to be easily walkable and be the focus of cycle ways.

There is also confusion regarding the relationship between housing and centres. The Strategy needs to be clear regarding the difference between destination and origin stations and their associated centres.

Destination stations and their centres are those which predominate in employment and higher order facilities. In the interest of co-location, these centre type uses should be within walking distance of stations or peripheral car parks.

Each subregion requires a full range of centres from at least one Strategic Centre to a series of neighbourhood centres. The Strategic Centres are an important component of Polycentric Sydney, an attribute which needs strengthening. Strategic centres, close to where people live, need to be encouraged and require constant monitoring to ensure job opportunities are available.

A second airport for Sydney

It is significant that a strategy for Metropolitan Sydney makes no mention of a second airport – even as an option “under consideration”. The fundamental, catalytic potential of this item and its associated infrastructure is unrivalled in NSW or the eastern seaboard.

UDIA NSW contends that the development of an airport in western Sydney would provide:

- The counter weight to the Sydney CBD and a combined growth node / corridor focus for Western Sydney;
- A catalyst for jobs growth in western Sydney, particularly in the Government’s recently identified Broader Western Sydney Employment Area;
- The opportunity to expand infrastructure in the west, with a potential to providing a road and transit connection to the north; and
- The potential expansion of the global arc westwards.

Very few post-industrialised societies get such an opportunity as this to fundamentally amend the geographical inequities of their region. The fact that the Strategy fails to address the issue suggests this document is more a statement of the “existing” situation rather than a comprehensive “vision” for the future. While UDIA NSW recognises that this is a Federal issue, we believe that the State Government can play a major role in ensuring that the region secures its future infrastructure needs and most significant opportunities.

Broader Western Sydney Employment Area

The Broader Western Sydney Employment Area (Broader WSEA) has been identified, in one form or another, as a key area for future employment lands in a number of past strategies, with little progress in planning.

The draft Strategy identifies this area as the focal area for accommodating a significant proportion of employment activities for residents in western Sydney over the next 20 years and beyond. The release of the draft Structure Plan for the Broader WSEA is welcomed by UDIA NSW, however it is disappointing that it has been released towards the end of the Strategy’s exhibition period. UDIA NSW contends that, given its potential significance, the Structure Plan should have been released in conjunction with the draft Strategy, enabling a robust and meaningful debate to occur during the Strategy’s consultation period.

Never the less, the draft Structure Plan's release is a positive and timely step towards ensuring the future employment needs of the Sydney's west are met. UDIA NSW believes that to achieve employment targets, the Broader WSEA must accommodate a number of employment uses from business parks and commercial precincts to industrial and logistic centres if it is to cater for the forecasted future employment needs. UDIA NSW believes this can be achieved through changes to zoning controls that allow for a broader range of employment uses to occur.

The Badgerys Creek site for Sydney's second airport would be a catalyst in driving jobs growth in the region. However, we believe that action on the planning for the employment areas must be finalised in lieu of a decision being made on the airport lands.

6 MONITORING SUCCESS

Monitoring the progress of strategic plans is vital in ensuring that the objectives and forecasted growth are met and infrastructure is delivered. This requires meaningful and measurable actions and targets to be set. The draft Strategy is generally weak in this area, with population and employment targets the only area where progress can be meaningfully measured.

UDIA NSW contends that without measurable actions and targets across all areas of the Strategy, it will be difficult for the NSW Government to fully understand whether the Strategy is tracking to plan.

UDIA NSW believes that monitoring of the Strategy must be conducted by an independent panel, outside of government and its agencies, that can objectively critique the achievement, or otherwise, of the Strategy's objectives and actions. This would also need to be conducted on a regular basis, including:

- On an annual basis to assess short term targets;
- On a two year basis to assess medium term targets; and
- On a five year basis, in line with the release of Census data.

UDIA NSW believes that a review regime should be legislated, require the regular review of the Strategy. This will ensure the currency of the strategy and information and help to identify where blockages to target achievement have occurred. This will allow policies to be modified to ensure that the delivery of the plan is not impeded.

7 IT'S ALL ABOUT DELIVERY

One of the principal challenges of a metropolitan strategy is in its implementation. The poor implementation in previous years has been constrained by a lack of institutional support within Government for the delivery of the desired outcomes.

UDIA NSW believes that the current reform agenda of the NSW Government should be applauded, particularly in relation to the review of the planning system. While a transparent, efficient and certain planning system is integral to the success of the delivery of the Strategy's objectives, it is not the only challenge.

Governance

Successful strategic planning requires strong leadership, with clearly defined authority, responsibilities, and accountability. Without these to drive change, there will be a breakdown in confidence in the planning system.

The Strategy identifies the CEO Group will have responsibility for monitoring the progress of the final strategy. The delivery of the objectives of the strategy is shifted to the Subregional Delivery Plans and Local Plans, with no indication of who will be responsible to the delivery of the objectives and the consequences of not delivering.

UDIA NSW believes that given the composition of the CEOs Group, it should also be responsible for the delivery of the objectives and targets of the strategy. A line of accountability to a Ministerial Committee is also crucial in ensuring the Group can focus on implementation. This will encourage all departments and agencies to seek solutions that will ensure that the strategy is delivered.

Commitment to adoption

There needs to be a commitment to the long-term adoption of the Strategy, free from interference and continual change. Its content must be dependable and reliable, and represent the committed directions for Sydney's growth. It should enable appropriate and efficient-forward planning by public sector investment in infrastructure and services, and private sector investment in homes, shops, entertainment and employment.

The lesson is that Sydney's Strategy needs to be genuinely dependable, consistent and reliable over time. Its land use strategies must be enshrined in overarching zoning plans that require comprehensive consultation and agreement to enact change. All State Government and Local Government infrastructure and zoning plans must promote it and then adhere to it. In short, it needs to be a robust framework for planned growth.

Education and ownership

Educating communities and building consensus is required so that Sydney's residents can gain a sense of ownership of the strategy and an appreciation of the challenges and conflicts it seeks to balance. This ownership and recognition is vital if the strategy is to play a greater role in Sydney's planning than previous strategies have in the past.

The preparation of the Strategy must involve comprehensive consultation with both the community and Government agencies. It must canvas and discuss challenges and conflicts, and investigate the various opportunities and impacts of adopting particular directions.

The aim of the consultation process must be ownership by the community and government agencies, or at the very least, an understanding that trade-offs may be required to achieve a balance of housing growth, infrastructure provision, employment opportunities, amenity and environmental protection.

CONCLUSION

The draft Metropolitan Strategy for Sydney provides a clear vision for Sydney over the next 20 years and a commitment from the NSW Government to ensuring that Sydney remains as Australia's global city. The focus on the delivery of more housing and jobs, linked and serviced by good infrastructure is fully supported by UDIA NSW and the industry.

Meeting the challenges for the region will not be an easy task and will take clear direction and leadership from State and Local Government, and buy-in and a sense of ownership from the community, including business and stakeholders. It is essential that Sydney residents see the benefits that growth should deliver – that is, more affordable housing, greater job opportunities and quality infrastructure. UDIA NSW believes the Strategy is a step in the right direction.

The UDIA NSW looks forward to the finalisation of this important and visionary document for Metropolitan Sydney as soon as practicable.

UDIA NSW, and the industry, is committed to working together with the NSW Government in delivering the adopted Strategy and ultimately a more vibrant and connected region.

ABOUT UDIA NSW

The Urban Development Institute of Australia NSW (UDIA NSW) is the leading industry group representing the urban development sector in NSW.

UDIA NSW aims to secure the viability and sustainability of urban development for our members and therefore the communities that they create. We advocate for an efficient planning system that accommodates the State's growing population and stimulates economic growth. Our campaigns support the delivery of 40,000 new homes in NSW per year, to make housing more affordable, and the provision of quality, affordable infrastructure to support development.

UDIA NSW represents the leading participants in the urban development industry with more than 500 member companies including developers, financiers, consultants, property managers, planners, builders, manufacturers, and State and local government bodies. A quarter of these members are based in regional NSW.

UDIA NSW members are represented by an elected Council of 13 leading industry practitioners who are responsible for the strategic direction of the Institute. UDIA NSW also has an extensive committee and regional chapter structure that involves more than 300 of the development industry's key stakeholders in policy formulation.

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