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2 May 2025

Ms Lynda Voltz, MP
Chair
Committee on Transport and Infrastructure
NSW Legislative Assembly
Parliament House
Macquarie Street
SYDNEY NSW 2000

Dear Ms Voltz,

The Property Council of Australia welcomes the opportunity to provide a submission to the Legislative Assembly Committee on Transport and Infrastructure's inquiry into infrastructure for electric and alternative energy source vehicles in NSW.

As the leading peak body representing Australia's property industry, our membership spans property developers, financiers, builders, asset managers and owners across all asset classes. We recognise that the transition to low- and zero-emission vehicles will significantly influence the future of our cities, energy networks, transport systems, and built environment, and that the property sector will play a central role in enabling this transition.

Funding and location of electric vehicle chargers or infrastructure for other potential energy fuel sources

The rollout of charging infrastructure must be carefully planned and funded in partnership between government and industry. Strategic co-investment is required to ensure that electric vehicle (EV) charging and alternative fuel infrastructure is not only concentrated in metropolitan centres but also extended across regional and rural NSW. Incentives such as tax concessions, grants, and streamlined planning approvals can play a critical role in supporting the integration of charging infrastructure in mixed-use precincts, commercial developments, industrial hubs, and transport corridors.

To facilitate this integration, the state's planning framework must be updated to ensure consistency and clarity. Planning controls should be revised to embed requirements for EV charging infrastructure in new developments and to make it easier to retrofit existing buildings. Development assessment processes must be modernised to reduce red tape, providing greater certainty to developers and investors seeking to deliver EV-ready buildings.

One of the most significant infrastructure challenges relates to power supply. The additional electrical load required to support EV charging, particularly high-capacity charging stations, often exceeds the capacity of current electrical infrastructure. As a result, both existing and future sites will often require substantial upgrades to substations and distribution networks to accommodate increased demand. These upgrades are technically complex and financially burdensome,

particularly in built-up areas where space constraints and access issues further escalate costs. Without dedicated funding streams or cost-sharing mechanisms to support substation upgrades, many developments will be unable to meet demand for EV charging, which could ultimately hinder NSW's progress toward transport decarbonisation.

Viability of alternative energy sources for freight, heavy vehicles and other licenced vehicles in regional communities

While battery-electric vehicles are becoming more viable for passenger cars and light commercial vehicles, they are not currently suitable for all segments of the transport sector. Heavy freight vehicles, long-haul trucks, agricultural equipment, and other specialised vehicles require alternative energy solutions, such as hydrogen, biofuels, and renewable diesel. A technology-neutral approach that supports multiple fuel pathways is essential to ensure that the transition is inclusive of all vehicle types and does not disproportionately impact industries reliant on heavy transport.

Currently, most EV charging stations (particularly those at petrol stations and retail centres) are designed to service passenger vehicles. They often lack the size, power capacity, and manoeuvrability required to support electric trucks or heavy vehicles. Significant investment will be required to upgrade existing retail and service station infrastructure to accommodate heavy vehicle charging. This includes redesigning parking bays, installing higher-capacity chargers, and ensuring compliance with safety and traffic management regulations. Without these upgrades, the freight and logistics sectors risk being left behind in the transition to low-emissions transport.

Use of existing infrastructure and measures to support a competitive market, including 'ring-fencing' policies

There are significant opportunities to repurpose and retrofit existing infrastructure to support the rollout of EV and alternative fuel networks. Car parks in commercial and residential buildings, retail precincts, and industrial estates can serve as valuable sites for the installation of charging infrastructure. However, retrofitting these sites often triggers the need for costly electrical upgrades, spatial reconfiguration, and compliance with new safety and insurance requirements. Government support, in the form of capital funding, planning concessions, and technical guidance, will be essential to unlocking the potential of existing assets.

To ensure fair and open competition in the provision of charging infrastructure, it is essential that regulatory safeguards are maintained. Ring-fencing arrangements should be preserved to prevent electricity network operators from leveraging their monopoly positions to dominate the competitive EV charging market. A level playing field will enable a diverse range of private operators, property owners, and energy providers to invest in infrastructure and services. This will encourage innovation, ensure price competition, and ultimately deliver better outcomes for consumers.

A robust regulatory framework is also needed to support data transparency and system interoperability. Providing third-party access to network connection data, standardising charging technology, and ensuring seamless payment systems will make it easier for consumers to access services and for investors to scale up deployment across multiple sites.

Measures to ensure the transition of workers from affected industries and industry standards

The development of consistent standards for infrastructure installation, operation, and safety is urgently needed. Building owners, developers, and facilities managers must have confidence that their investments in EV and alternative fuel infrastructure comply with best-practice guidelines and are compatible with broader network systems. A coordinated accreditation framework, ideally at a national level, would provide assurance around performance, safety, and interoperability, while also reducing the regulatory burden on project proponents.

Other considerations

Insurance

There are significant barriers and uncertainty associated with planning requirements and fire safety criteria for the install of EV chargers to existing assets which is flowing through to insurance premiums. Many property owners are reporting rising insurance premiums in buildings across all asset classes, particularly in high-performance assets where the presence of EV charging stations and battery storage is perceived to increase fire risk. These concerns are beginning to affect outgoings and the insurability of buildings. If this risk is not addressed, insurance premiums will become progressively more unaffordable, or properties will become uninsurable.

Evidence-based safety guidelines and risk mitigation strategies such as enhanced fire suppression systems, spatial separation of charging stations, and material compliance should be developed as a priority to ensure infrastructure can be safely and affordably integrated into the built environment. These guidelines and strategies should ideally be consistent at a national level (e.g., incorporated into the National Construction Code) and supported by Fire and Rescue NSW and the Australasian Fire & Emergency Service Authorities Council. Once developed, such guidelines can flow through to the insurance industry and address the uncertainty / premium starting to be attached to presence of EV chargers.

Land use planning

The planning system continues to seek to reduce the number of car parking spaces available in new residential and commercial developments to encourage walkability and the use of public transport infrastructure. While this objective has its merits, there is a significant rise in the number of commercial light vehicles being used to distribute freight, particularly the last mile in urban/city environments. In addition, these commercial light vehicles are often privately owned and will need to be parked and charged when not in use if the industry is to move towards electrification. In London, all electric last mile urban delivery depots have been established such as DPD's facility in Westminster, which are proving to be successful in many ways; however, most of the vans and light commercial vehicles are run by owner-driver franchisees which have nowhere to park and charge them if they live in an apartment. A review of planning restrictions and requirements is needed to allow the private sector to provide solutions to EV charging.

Transition to net zero

The transition to low-emission vehicles is also fundamental to achieving NSW's net zero targets. The transport sector remains one of the largest contributors to greenhouse gas emissions. Strategic investments in charging and alternative refuelling infrastructure, when paired with

planning policies that promote renewable energy generation and localised energy storage, will play a critical role in supporting decarbonisation of the built environment more broadly.

Data transparency and technology use

Data transparency and digital platforms must also underpin the state's infrastructure rollout. Access to real-time data on charger usage, energy demand, consumer behaviour, and infrastructure capacity will support evidence-based decision making and enable government and industry to respond quickly to emerging needs.

Conclusion

The Property Council thank the Committee for the opportunity to provide a submission in response to this inquiry. If you have any questions about this submission, please contact NSW Policy Manager, Emma Thompson at ethompson@propertycouncil.com.au or by phone on 0458 294 817.

Yours sincerely,

Katie Stevenson
NSW Executive Director
Property Council of Australia