

14 August 2023

Strategy and Engagement
Department of Planning, Lands and Heritage
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Position Statement – Electric Vehicle Charging Infrastructure

Thank you for the opportunity to provide feedback on the draft Position Statement – Electric Vehicle Charging Infrastructure (the Position Statement).

The Urban Development Institute of Australia (UDIA) WA is the peak body representing the property development industry in Western Australia, and is a membership organisation with members from both private and public sector organisations. Our key focus is on facilitating the timely provision of supply across the housing continuum.

UDIA WA has long advocated for new or amended policies and planning instruments with implications for the provision of diverse supply to be carefully examined through a housing affordability lens. It is important to bear in mind that national housing construction costs have increased by 31.6% from December 2015 to March 2023, with most of this cost increase having occurred in the last two years, while Perth CPI in the same timeframe increased by only 18.5%. At a time when we have the toughest construction market in recent history and are amid a housing crisis, prioritising housing affordability is crucially important.

We fully support the Western Australian Government’s championing of the adoption of electric vehicles (EVs) and associated infrastructure as part of a more sustainable future in seeking to accommodate WA’s population growth. However, the onus should not be placed on the development industry to fund any shortfall in service infrastructure which is not driven by or because of their activities.

UDIA WA is therefore concerned with the direction of the Position Statement regarding the Section 6.1 recommendations for local government in particular which, along with other contributions made by developers (e.g. through infrastructure, public open space, and public art contributions, etc.) would impose further costs on the delivery of housing.

The goal of the State Government’s current planning reforms is to create a more consistent basis by which planning occurs within Western Australia. However, the adoption of this position statement as it stands risks taking a backward step by opening up inconsistency between local governments as some will adopt this approach and potentially mandate the specified ratios, some will take their own approach and others, not at all. Going down this path will reduce oversight by the State in planning for the EV infrastructure needs of the community and may in fact lead to all parties (consumers,

developers, and the State Government) facing higher costs to address the discrepancies between local government adoption.

In its current form, the position statement does not appear to consider implications for affordability, and instead would see additional and disproportionate costs for apartment development (compared to detached housing likely to already offer a general power outlet in the garage or carport). To date, many of our members who operate in the built form development space have already been responding to the demands of the market while uptake has been very low by, at a minimum, providing the infrastructure backbone and load/demand management system/software to enable apartment owners to opt-in to having a charger installed as and when required for their own use. The adoption of EVs in the market is now rapidly increasing year on year from the low base, and we would anticipate our industry will continue to respond to the demands of consumers as the uptake continues to increase as has been seen in many other parts of the world.

It is reasonable for the position statement to encourage the development industry to consider EV charging as a component of site design, to provide the back-boning infrastructure or the capacity to facilitate charging options later (this is the largest cost inhibitor for existing developments to install EV charging). However, requiring or mandating charging infrastructure requirements for every car bay as a component of development approval is unjustified and not supported. This may not be the intent of the Position Statement, but there is a risk some local governments may apply the provisional ratios in Table 1 as such.

It is unclear how the recommended provisional ratios have been devised and it is inappropriate to have standard ratios which could apply to the entire State as this does not consider anticipated demand based on the likely buyer segments for different developments in different localities, nor impacts on attractiveness or affordability of different housing products. This could result in the provision of unnecessary infrastructure and, with this rapidly evolving technology, unnecessary maintenance and upgrade requirements which will all add further costs.

In our view, this position statement would not be assisting consumers nor developers in addressing the needs of the market and instead, would be placing further cost pressures on an industry that is attempting to increase supply amid the housing crisis that our State is currently facing.

At a minimum, the following changes are recommended:

- With the intent being 'To encourage the provision of EV charging infrastructure', Section 6.1.1 and Table 1 should be removed to avoid these being treated as mandatory by any local governments, with developments not meeting these automatically being considered as non-compliant.
- The first dot point under Section 6.1 should be amended to emphasise that at this time with low EV uptake any local planning policies should seek to encourage the provision of charging infrastructure and/or the design of sites to facilitate it where residents / employees / visitors are likely to benefit from that infrastructure, rather than 'introduce the requirement to provide...' this for every car bay.

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Thank you again for the opportunity to provide feedback on the draft Position Statement. Should you require further information or wish to discuss this please contact me on 0409 386 880 or at tsteinbeck@udiawa.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tanya Steinbeck', is shown within a thin black rectangular border.

Tanya Steinbeck
Chief Executive Officer