

RAC response to the *Planning and Development Act 2005* reform

September 2021



For the better



6 September 2021

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Thank you for inviting RAC to comment on Phase Two of the *Planning and Development Act 2005* reform on behalf of our 1.2 million members and the Western Australian (WA) community.

RAC is a purpose-led member organisation, and we exist to be a driving force for a Better WA. We work collaboratively with government, industry, our 1.2 million members and all Western Australians to champion change that will deliver safer, sustainable and connected communities.

With Perth and Peel needing an estimated 800,000 new homes¹ over the next 30 years to accommodate our growing population, well-planned and designed communities, particularly in existing areas, will enable better access to employment and education opportunities, essential services, and local amenities. How physically and socially 'connected' we feel (both to other people and to the places where we live and interact), is important to our general health and wellbeing.

RAC welcomed the reform of the WA planning system, to ensure it is more strategically-led and transparent. It is important that planning and development standards and guidelines be regularly reviewed to align with and support strategic land use and transport priorities, and to capitalise on technological advances such as low-emission and automated vehicle technology. This will aid more effective planning, development and transport infrastructure decisions to support the sustainable growth of Perth and WA.

Recognising the critical link between all modes of transport and land use activities and seeking to mitigate the potential adverse implications of planning, development and infrastructure decisions on climate change, air quality and public health is crucial to enhancing liveability through the planning system.

Our [2021-22 Public Policy document](#) sets out our positions in relation to a range of planning and transport matters of relevance to the reform. We also previously provided [a response to the *Green Paper concepts for a strategically-led system*](#) in July 2018.

For the purposes of this response, we have focussed specifically on the importance of and need for appropriate mechanisms to increase charging provision associated new development to support and cater for increased uptake of electric vehicles (EVs).

¹ Department of Planning, Lands and Heritage (2018), "Perth and Peel@3.5 Million". Accessed at <https://www.dplh.wa.gov.au/perth-and-peel-@-3-5-million>

It has been forecast that electric vehicles (EVs) could account for 70 per cent of new vehicle sales and 30 per cent of the total vehicle fleet in Australia by 2040². In a recent RAC Member Tracker focused on sustainability³, almost one in two (44 per cent) respondents indicated they would consider an EV for their next vehicle purchase.

To realise this, an increase in publicly available and residential EV charging infrastructure will need to occur. RAC welcomed the WA State Government's recent commitments to support EV uptake (including through infrastructure), within the *State Electric Vehicle Strategy for Western Australia (EV Strategy)*.

The European Federation for Transport and Environment cites numerous studies⁴ that determine in countries where EVs are more prevalent, access to at-home charging is the single most important factor in considering purchase of an EV. Further, it is estimated that between 80⁵ and 95⁶ per cent of all EV charging happens at home and work (not at public chargers). The importance of access to at-home charging for EVs makes it imperative that people have the necessary provision to allow such charging.

Globally, several jurisdictions have considered the implications of access to charging facilities in new residential and non-residential developments and implemented requirements in planning codes (see Figure 1 below). These jurisdictions have begun stipulating a minimum number of charging points⁷ dependant on the size and nature of the developments.

² Bloomberg NEF (2020), Electric Vehicle Outlook 2020. Accessed at <https://about.bnef.com/electric-vehicle-outlook/>

³ RAC (2020), RAC Member Priorities Tracker Sustainability, October 2020. Accessed at <https://rac.com.au/about-rac/advocating-change/reports/-/media/2dedfe0c0fac47028f749880175dfb1c.ashx>

⁴ Transport and Environment (2018), Roll-out of public EV charging infrastructure in the EU Is the chicken and egg dilemma resolved? citing Bailey et al., 2015; Dunckley and Tal, 2016; Nicholas and Tal, 2017; Plotz and Funke, 2017; Skippon and Garwood, 2011. Accessed at https://www.transportenvironment.org/sites/te/files/Charging%20Infrastructure%20Report_September%202018_FINAL.pdf

⁵ Department of Transport (UK), Office for Low Emission Vehicles (2019), Charging electric vehicles. Accessed at <https://energysavingtrust.org.uk/wp-content/uploads/2020/09/Charging-Electric-Vehicles-Best-Practice-Guide.pdf>

⁶ Transport and Environment (2018), Roll-out of public EV charging infrastructure in the EU Is the chicken and egg dilemma resolved? Accessed at https://www.transportenvironment.org/sites/te/files/Charging%20Infrastructure%20Report_September%202018_FINAL.pdf

⁷ A charging point is capable of charging one vehicle at a time. A charging station consists of multiple charging points.

Jurisdiction	Year taking effect	Construction type	Percent of spaces with charge points required	Percent of spaces “EV-ready” required	Other notes
London	2016	New residential	20%	20%	
		New retail	10%	10%	
		New workplace parking lots	20%	10%	
European Union	2020	New residential with >10 spaces, or major renovation	-	100%	Directive requires Member States to implement their own policies by 2025
		New non-residential with >10 spaces, or major renovation	1 space	20%	
Guangzhou	2019	New residential	-	100%	Some specific applications require charge points to be installed
		New public parking lots	-	30%	
		New highway service stations	-	50%	
San Francisco	2018	All new construction and major renovation	-	100%	One fast charger can substitute for 5 EV-ready spaces

Figure 1: International building codes and EV charging^{8,9,10,11,12}

In Australia, NSW and the ACT have begun considering EV charging facilities in residential planning settings. In NSW, as part of the current *Design and Place State Environmental Planning Policy*¹³ (Design and Place SEPP) process, proposed changes include specifying a target for EV charging points and car spaces (target to be determined); and requiring developments to be ‘EV-ready’ by “providing sufficient power to the meter board to enable vehicle charging at every car space and delivering power supply to each car space for future conversion and adoption”. In the ACT, exemptions for planning approvals apply to EV charging points under certain conditions to encourage uptake and remove barriers to installation^{14,15}.

⁸ International Council for Clean Transport (ICCT) (2020), Electric vehicle charging guide for cities. Accessed at https://theicct.org/sites/default/files/publications/EV_charging_guide_03162020.pdf

⁹ Building code information from: “Chapter 6: London’s Transport” in The London Plan (Greater London Authority: 2017), <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/londonplan-chapter-six-londons-transport-0>;

¹⁰ European Union Directorate-General for Energy, Questions & Answers on Energy Performance in Buildings Directive,” Accessed at https://ec.europa.eu/info/news/questions-answers-energy-performancebuildings-directive-2018-apr-17_en

¹¹ Guangdong provincial government (2019), Views on accelerating the innovation and development of new energy vehicle industry [广东省人民政府关于加快新能源汽车产业创新发展的意见], Accessed at http://www.gd.gov.cn/gkmlpt/content/0/146/post_146920.html

¹² San Francisco Board of Supervisors (2017), San Francisco Green Building and Environment Codes - Requirements for Installation of Electric Vehicle Chargers, Ordinance No. 92-17, April 17, 2017. Accessed at <https://sfbos.org/sites/default/files/o0092-17.pdf>.

¹³ Department of Planning, Industry and Environment (NSW) (2021), Explanation of intended effect for a Design and Place SEPP, February 2021. Accessed at <https://www.planning.nsw.gov.au/-/media/Files/DPE/Reports/DP-SEPP-Explanation-of-Intended-Effect-Final-2021.pdf?la=en>

¹⁴ Department of Environment, Planning and Sustainable Development (ACT) (2020), Exempt development changes, 16 July 2020. Accessed at <https://www.planning.act.gov.au/whats-new/exempt-development-changes>

¹⁵ *Planning and Development Regulation 2008* (ACT) under the *Planning and Development Act 2007* (ACT). Accessed at <https://www.legislation.act.gov.au/View/sl/2008-2/current/PDF/2008-2.PDF>

The WA EV Strategy acknowledges that: “Planning for the provision of slower destination charging associated with buildings is also important. The incorporation of adequate electrical infrastructure at the time of building construction – particularly for multi-use dwellings, apartments and workplaces – will significantly reduce the cost associated with installing charging stations at a later date”. The current planning reform is the opportune time to implement the State Government’s plans to, “in collaboration with other states and territories and national working groups, consider:

- The development of guidelines to make buildings and other accommodation ‘EV ready’ – ensuring that new buildings cater for electric vehicle charging.
- Encouraging the Australian Building Codes Board and Standards Australia to produce guidance material on options to retrofit electric vehicle charging points in existing buildings.
- Reviewing land use planning guides and standards related to fuel and service stations to support establishment of electric vehicle infrastructure”.

WA is currently on the cusp of broader EV adoption and this reform offers an opportunity to ensure future developments are ‘EV ready’. Future proofing new developments in WA through introducing appropriate minimum requirements for charging provision and/or other incentivisation through the planning system is vital in helping to reduce potential disincentives to buying an EV and ultimately to realising their potential to help reduce harmful vehicle emissions. We would welcome this being given further consideration as part of the reform.

We look forward to continuing to engage with Government on this and other projects seeking to improve how our communities are planned and designed, to ensure our members and the community have access to safer, more sustainable and connected mobility options.