

14 August 2023

Department of Planning, Lands and Heritage
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RE: Draft Position Statement: Electric Vehicle Charging Infrastructure

SCA (WA) is pleased to have the opportunity to respond to the Electric Vehicle Charging Infrastructure Position Statement, as a part of the WA State Electric Vehicle Strategy.

General Feedback

Existing Strata Buildings

SCA (WA) is supportive of the overall objective of draft strategy to implement and facilitate the provision of electric vehicle (EV) infrastructure across the state.

However, SCA (WA) believes the draft position statement does not fully take into consideration of the needs of the significant number of residents currently occupying *existing* residential strata buildings in Western Australia.

According to the [Australasian Strata Insights Report 2022](#):

- The total number of existing strata schemes in WA is 52,227.
- The total number of existing strata lots in WA is 256,586.
- The projected population range of people living in strata title in Western Australia is between 312,535 and 558,098 people; or between 11% – 27% of the total population.¹

As the position statement notes, the expectation is that a large proportion of EV charging will occur at home, and thus the availability of charging infrastructure in residential settings is critical.

Firstly, SCA (WA) acknowledges and supports the amended provisions in the National Construction Code (NCC) that will require multiple classes of buildings (including Class 2 apartment blocks or buildings that contain two or more sole-occupancy units) that are built beyond October 2023 to be able to accommodate EV charging (see [Part J9 – Energy monitoring and on-site distributed energy resources](#)). This provision will go a long way to ensuring that the built environment in WA and across Australia is future proofed.

¹ Easthope, H. Hynes, D. Lu, Y. Wade, R. *Australasian Strata Insights 2022*. City Futures Research Centre, UNSW. Accessed at https://cityfutures.adu.unsw.edu.au/documents/717/2022_Australasian_Strata_Insights_Report.pdf

SCA (WA) also recognises that the position statement is intended to relate to “new proposals or significant redevelopments, and is not intended to apply retrospectively.” However, a significant proportion of the strata housing stock in Western Australia consists of older buildings, that have not been built with the level of electrical infrastructure sufficient to support the additional load that EV charging creates.

Common facilities, limited space and ageing infrastructure in strata communities can create unique hurdles for EV infrastructure integration that aren’t commonly faced in standalone homes or other areas. Retrofitting residential developments such as multi-storey apartments to accommodate backbone EV charging infrastructure (in line with the requirements of the National Construction Codes (NCC) for new builds) is particularly challenging and complex, and would therefore almost always classify as a “significant redevelopment” in the context of the position statement.

As such, SCA (WA) believes that further consideration needs to be made to assess the needs of the existing strata stock in WA, and for the government to incorporate existing strata stock as a core consideration in the planning of the Western Australian System.

Safety

The position does not adequately incorporate or consider how the implementation of electric vehicle charging infrastructure will impact safety considerations for the facilities that will be providing the charging.

Due to the nature of their composition, the lithium-ion batteries that power EVs create different fire safety considerations for EVs than that of conventional ICE vehicles, which must be taken into account, especially in the context of a strata/ multi-storey environments.

Whilst evidence suggests that electric vehicles are less likely than conventional ICE vehicles to be involved in a fire incident, when battery fires occur, the characteristics and fire management practices diverge significantly.

As such, SCA (WA) would implore the government to consider in the draft position statement how the implementation of electric vehicle charging would impact safety considerations in the land use types the statement makes recommendations for.

Grid Stability

A greater focus on load management to ensure grid stability is something that could be better emphasised in the draft position statement, as this will benefit Western Australia’s overall plan of the comprehensive electrification of our buildings and economy.

Planning considerations must ensure that the times and amount of electricity dedicated to the vehicles being charged in different land use types is managed, and the provision to homes and businesses are prioritised.

About us

Strata Community Association WA (SCA WA) was born in 1989 due to some passionate individuals who determined the need for a unified industry body to bring about understanding, awareness and uniformity in the Strata Industry. The 'Industry Body' should also when necessary provide representation to Government on whatever amendments may be required to the Strata Titles Act. The aim of SCA WA is to:

- Provide a structure and forum for better communication between regions.
- Enhance the responsibilities of industry members in a nationally consistent manner.
- Enable representation at a national level to the Department of Education, Science and Training and other statutory bodies.

Based on the 2022 Australasian Strata Insights Report, more than 105,000 Western Australian residents live in private apartments with 52,227 strata schemes and 256,586 lots registered. Australia-wide, more than 2.5 million people live in flats and apartments, the vast majority being strata titled. This figure does not include other forms of strata title such as townhouses and community titled developments. Nor does it include businesses operating in strata titled commercial buildings. The estimated value of property under strata title in Australia in 2022 is approximately \$1.3 trillion.

As the growth of apartment and strata living has intensified over the last decade, the strata management strata services industry has grown in lock step to serve it. Strata managers navigate through a maze of legislation and regulation ranging from actual strata specific legislation, regulation, workplace, health and safety issues and building codes as well as measures applicable to the management of body corporate funds.