APPENDIX 3 Theme 2 A Healthy And Resilient Environment

Climate Change

OSCAR, September 2025

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Climate change

2.5 Theme 2: A healthy and resilient environment

Element 6 Natural hazards generally

SO6.9

The predicted effects of climate change are taken into account in assessing the potential impacts of natural hazards.

Responding and adapting to a changing climate

It is critical that development is responsive to the challenges posed by climate change. The planning scheme has been informed by the CSIRO climate change projections and Council's Coastal Hazard Adaptation Strategy and aims to help reduce greenhouse gas emissions and improve climate resilience. Important provisions in the planning scheme for achieving this include:

- providing for the protection, rehabilitation and reconnection of natural areas and habitats, including urban habitats;
- maintaining areas known to be, or predicted to be, particularly vulnerable to natural hazards and disasters free from new urban and rural residential expansion;

The Australian Climate Service, a partnership of Bureau of Meteorology, CSIRO, Bureau of Statistics and Geosciences Australia, recently released Australia's National Climate Risk Assessment. We presume council will review findings of this latest assessment against the CSIRO climate change projections referenced above and amend the draft scheme accordingly.

We strongly *recommend* an approach to climate hazards as that of the CHAS. This "Climate Risk Adaptation Plan", as with the CHAS, document the risks facing the coast and, develop triggers at which a mitigation or adaptation stratgey can be initiated. In this way, low climate risks of today are still addressed if or when the accelerating climate demands. As with the CHAS, this report can inform any planning scheme amendments and would be supported with a policy within the scheme.

We reiterate our support for the protection and reconnection of habitats. As discussed for the Biodiversity, Waterways and Wetlands Overlay Code, it is critical that refuges from climate extremes including floods, fire, drought and heat waves be identified and protected and connections provided to these refuges to allow movement to them as the extreme develops and return to surrounding areas after the extreme ends.

Element 9 Climate responsive, sustainable and adaptable design

SO9.1

> The Sunshine Coast's built environment embeds sustainable design features, including provision for: ….

SO9.2

> Buildings, streets and spaces are designed with a capacity for adaptation, reconfiguration and re-use in response to changing community needs, technologies and climate.

SO9.3

> Buildings, structures, spaces and infrastructure are designed to be resilient to extreme weather events and accelerating climate change.

As indicated in the notes for SO9.1 and relevant to 9.2 and 9.3, the success of these strategic outcome is heavily dependent on National Construction Code (NCC) having objectives compatible with those of council.

We understand[1] the NCC directs energy efficiency for all new class 3 and class 5-9 buildings and existing commercial and industrial buildings over 1,000m^2. The NCC does not make mandatory

1 P England (pers. Comm.) September 2025.

efficiencies of new residential apartment buildings nor existing residential homes.

The NCC requires parking lots other than 7a (public car parks) to have electrical distribution boards specifically dedicated for EV charging in:

- 100% of carpark spaces associated with residential apartments;
- 10% of carpark spaces associated with office and retail buildings;
- 20% of carpark spaces associated with other non residential buildings.

Proposed inclusions in the draft NCC are:

- commercial buildings include a requirement to install PV panels on-site depending on roof space, climate zone and building classification;
- requirements for wiring for destination charging in commercial premises.

The Regulatory Impact Statement on the 2025 NCC reforms seek to defer the wiring provisions[1] while the Queensland Productivity Commission has recommended the relaxation of the existing energy efficiency standards in the NCC.

To support councils strategic aims, we *recommend* that the NCC efficiency and wiring requirements be included in the draft planning scheme or a place held for them pending the outcome of the government deliberations. Without the NCC provisions, the planning scheme strategic outcomes for sustainability and its vision are unlikely to be met.

As the NCC does not appear to cater for the energy efficiency of some residential buildings, these should be considered ny council. Likewise the omission of public carparks from being wired for future car changing appears a significant oversight and council should include such.

SO9.4

> Integrated, connected and innovative infrastructure systems directly and indirectly minimise carbon emissions through design, construction and operation.

It was noted that the scheme requires developments to provides energy connections including gas. Given the severe adverse climate impacts from methane, we *recommend* at the very least that council require all new residential premises be wired to be fully electric even if a gas connection is to be provided. In this way, a future costly retrofit is avoided.

Element 11 Sustainable energy infrastructure

SO11.1

Development provides for energy infrastructure consistent with the planned energy infrastructure network and in accordance with the requirements of the electricity distributor.

SO11.4

Demand for centralised energy generation and infrastructure is minimised through development incorporating best practice energy efficient design and maximising the use of renewable and sustainable energy supplies and sources.

OSCAR fully supports development of distributed energy resources (DER) and consumer energy resources (CER) as suggested in SO11.4. It appears that while SO11.1 is mandatory, So11.4 is qualified by "minimised" and "maximising". Full support for CES above the NCC requirements which are under review through PV panel and battery requirements do not appear to be strong through the scheme.

We appreciate some of the following may by best served through other jurisdictions, but suggest consideration of:

- Increase the energy efficiency for standalone homes and low rise apartments where not addressed by the NCC
- Ensure all new homes are enabled and ready for batteries and EV charging
- Prohibit the extension of the gas network in all new residential developments
- Increase the energy efficiency rating for high rise apartments and include stationery batteries where not addressed by the NCC
- Regulate open space car parks for destination charging and solar generation /solar canopies.

SO11.5

Development for renewable energy facilities, including green hydrogen, is encouraged where appropriately located and sensitively designed to protect agricultural land and productivity, and regional landscape values, and avoid adverse amenity impacts.

Given that DER and CER can deliver apply current technologies and have the potential for significant mitigation of greenhouse gases in the short term, we *recommend* the inclusion of such in SO11.5 if council is to cherry pick other energy developments. While "renewable energy facilities" is largely technology agnostic, specific reference to green hydrogen is not. We understand that proposed hydrogen projects have been cancelled or deferred here and overseas recently. While costs remain excessive, we *recommend* that the council not been seen to favour what might pose unnecessary further costs on the ratepayers. As stated above, the scheme should be technology agnostic.

SO11.6

In urban areas, and elsewhere where appropriate and practicable, electricity supply lines are located underground to improve safety and visual amenity.

We support this outcome. Given however that overhead lines are often adjacent to urban areas and not within the urban zoning, we *recommend* the inclusion of a buffer around urban areas to better protect "safety and visual amenity".

8.8 Transport and Parking Code

PO16

Development provides electric vehicle charging bays and infrastructure for the demand anticipated to be generated by the development.

AS16

Development provides electric vehicle charging bays and infrastructure in accordance with the standards specified in the Transport and Parking Planning Scheme Policy.

5.4 Transport and Parking Planning Scheme Policy

5.4.8.1 Context and rationale for assessment benchmarks

(2) Emerging transport trends and technologies, such as ride share and **electric vehicles**, will increasingly influence the way we move. In order to 'future proof' new development, where demand is anticipated, development design should incorporate parking bays for ride-share vehicles and electric vehicle charging stations, particularly for residential and larger commercial uses.

Electric vehicle charging infrastructure

(4) Development provides **electric vehicle** charging bays and infrastructure for a land use listed in Table 5.4O Minimum on-site parking spaces with electric vehicle charging infrastructure at the minimum rate specified in Table 5.4O.

Note – **Electric vehicle** charging infrastructure should be provided as a minimum Level 2 fast charger, including dedicated AC EV chargers up to 7kW (32A single phase) or 25kW (three phase).

Efficient use of grid energy and the promotion of electric vehicles is best served by the supply of charging infrastructure where EVs are parked for longer periods during the day. In general, this will at home, work or carparks at transit hubs. Charging facilities at other locations where cars may be parked for an hour or longer will also serve the aim of efficient energy resources.

The provision of charging facilities in Table 5.4O is met for most developments by "Sufficient spaces to accommodate demand anticipated to be generated by the development". The NCC requires wiring to between 10% and 20% of car spaces. We *recommend* that "Sufficient spaces to accommodate demand anticipated to be generated by the development" be replaced with "1

space with an additional space for each subsequent 10 car parks".

Multiple dwelling, Resort complex, Short-term accommodation and Service station developments are the only of 24 developments where charging infrastructure has been determined in the scheme. Other than for service stations, the criteria states "1 space / 10 dwellings (where ≥10 dwellings proposed)". We strongly *recommend* this be amended to "1 space with an additional space for each subsequent 10 dwellings". As written most new developments will not provide charging infrastructure and this appears contradictory to the strategic outcomes.

We note that service stations require a minimum of 2 AC chargers. EVs are not expected to park at service stations for extended periods while engaging in other activities unlike shopping, medical, entertainment and sport for example. We *recommend* that Service stations should be required to provide DC chargers as "Sufficient spaces to accommodate the demand anticipated to be generated by the development (with a minimum of 2 DC chargers per site).

Battery storage facility

The scheme appears to regulate battery storage facilities in industrial and community facilities zones. One important potential growth area are expected to be battery storage facilities within sub-station districts, new estates and retrospectively in urban areas. In some of these instances, available industrial or community facilities zoning may be limited. Council should consider mechanisms under the scheme to promote battery storage facilities in these circumstances.