

Attachment A

Summary of Submissions

Summary of submissions – All-electric development



Activities to support the consultation

The consultation period ran from 15 July 2025 to 12 August 2025. The following activities were undertaken to support the consultation:

- A dedicated webpage and online survey allowed community members to review the draft controls and provide feedback. The survey was open throughout the exhibition period, and the page is available at:
<https://www.cityofsydney.nsw.gov.au/policy-planning-changes/your-feedback-proposed-changes-planning-controls-new-all-electric-homes-offices-hotels>.
- The survey was open for feedback from 15 July 2025 to 12 August 2025.
- The project was included in the July and August editions of the Sydney Your Say eNews sent to approximately 5,000 subscribers. This provided a link to the webpage and survey. An image of the post can be found at Appendix A (Figure 1).
- Social media posts were featured on the City's LinkedIn page and Instagram in June 2025, linking to the consultation page. An example can be found at Appendix A (Figure 2).
- Approximately 90 key stakeholders, including those that had made a submission to the Discussion Paper: Electrification of New Development (discussion paper), were directly advised of the public consultation by email.
- Stakeholder information briefing sessions were offered during the public exhibition period and were attended by interested parties.

What the community told us

We received a total of 84 responses during the consultation period, including 35 via the online survey and 49 submissions by email. Of these, 3 submissions came from the development industry and related groups, 5 from advocacy organisations, 2 from utility and service providers, and 74 from individuals, encompassing both survey and email responses.

In total, 60 responses supported the all-electric provisions, 23 objected and 1 was neutral.

Submission method	Total responses	Support	Object	Neutral
Email submissions	49	34	14	1
Online survey	35	26	9	0
Total	84	60	23	1

Most submitters expressed support, highlighting benefits such as improved health outcomes, affordability, and climate resilience. Those in opposition primarily raised concerns regarding potential cost impacts for developers and consumers, energy reliability, and infrastructure capacity.

Issues raised in submissions by community members are summarised in Table 1. Issues are summarised by themes to capture the main concerns and areas of support. Issues raised by multiple submitters have been grouped under common themes to emphasise shared perspectives. Unique or less frequent concerns are also documented to ensure a comprehensive record.

Issues raised in submissions by industry groups and organisations are summarised in Table 2. Submissions have been summarised separately to reflect their specific feedback and positions.

Table 1: Issues raised in individual community member submissions

Submission	Response
<u>General support for electrification controls</u>	
27 community member submissions and 26 survey responses expressed general support for the proposed controls, citing the benefits of electrification. Seven submissions from industry bodies and organisations also supported the controls and are summarised in Table 2.	Support is noted.
<u>Support for the City's leadership</u>	
26 submissions supported the City's role in leading climate action through the electrification proposal. Submitters viewed the approach as setting an example for other councils. Several emphasised the value of using expert medical advice and commended the commitment to sustainable development.	Support is noted.
<u>Support due to economic benefits</u>	
26 submissions referred to economic reasons for supporting the proposal, including reduced energy bills and cost savings in building operation. Some highlighted the need to avoid costly future retrofits.	Support is noted.
<u>Support due to health benefits</u>	
25 submissions supported the proposal due to health-related outcomes, particularly the reduction of indoor pollution from gas appliances. Several referred to advice from health professionals and supported electrification to reduce pollution and protect residents' wellbeing.	Support is noted.
<u>Support for embedded electrical infrastructure in food and beverage premises</u>	
25 submissions supported requiring embedded electrical infrastructure in food and beverage premises. Submitters viewed this as a practical step that enables future electrification while allowing a phased transition for commercial kitchens.	Support is noted.
<u>Support for addressing energy security and gas shortages</u>	
One submission noted the role of electrification in reducing exposure to gas shortages.	Support is noted.
<u>Support for programs to assist existing buildings to transition</u>	
One submission expressed support for policies helping existing residential and commercial buildings move toward electrification.	Support is noted. Although the draft DCP applies only to new development, the City remains committed to supporting the transition of existing buildings toward net zero emissions. This includes ongoing programs such as the Better Buildings Partnership, CitySwitch, Smart Green Apartments, and sustainability grants and campaigns. These programs aim to support a practical and equitable

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Submission	Response
	transition for existing buildings, in parallel with planning controls for new development.
<u>Comment about gas disconnection fees</u>	
One submission raised concerns about high fees charged by energy retailers for gas disconnection and meter removal, which may discourage switching to all-electric systems.	<p>The City notes that the draft DCP applies only to new developments and does not require disconnection of existing gas services. However, concerns about gas disconnection fees potentially discouraging transitions to all-electric systems are acknowledged.</p> <p>The Australian Energy Regulator recently finalised Jemena Gas Networks' access arrangement for 2025–30, capping the upfront permanent disconnection fee at \$250 - significantly reduced from previous fees of over \$1,000. This pricing aims to balance customer costs, safety, and cost-reflective pricing. Temporary disconnections and multi-tenancy properties have separate fee arrangements to reflect the scope of works required.</p>
<u>General opposition to electrification controls</u>	
11 community member submissions and 9 survey responses opposed the proposed controls. Three submissions from industry bodies and organisations also opposed the controls and are summarised in Table 2.	Opposition is noted.
<u>Opposition due to fuel preference and consumer choice</u>	
6 submissions expressed a preference for gas appliances and emphasised the importance of maintaining consumer choice. Submitters opposed regulating energy choices and asserted individual rights to decide on fuel sources.	The policy applies only to new developments. Existing buildings - including the nearly 90,000 gas-connected homes in the local area - are unaffected. Buyers seeking gas appliances can continue to choose from the existing housing market.
<u>Concerns about the City's regulatory authority</u>	
5 submissions raised concerns that the proposed electrification controls represent an overreach of the City's authority. Submitters questioned whether the City has the legal jurisdiction to regulate energy choices. Some argued that mandating electrification goes beyond the City's core responsibilities and suggested that such decisions should rest with state or federal government. Others criticised the focus on electrification over more immediate local service priorities.	The City is empowered to set local planning controls through its DCP, reflecting local values and aligning with NSW and national climate goals, including net zero targets. The NSW Productivity and Equality Commission's March 2025 report supports using local tools like DCPs to limit new gas connections, highlighting benefits such as lower energy bills, improved health, equity for low-income households, and avoiding costly future retrofits.
<u>Concerns about reliability of electricity supply</u>	
4 submissions raised concerns about the reliability of electricity supply. Submitters cited personal experiences with frequent blackouts and power outages. They questioned the capacity of existing infrastructure to support full electrification and highlighted the importance of retaining gas appliances as a backup energy source. Some expressed distrust in renewable energy sources.	Ausgrid advised that the electricity network in Sydney, particularly the CBD, currently has significant capacity to support nearly all forecast electrification demand due to reduced overall consumption from energy efficiency improvements. Ausgrid emphasised that requiring all-electric development as the standard improves predictability, enabling more accurate and efficient planning for network demand. They do not anticipate major impacts on their medium-term investment plans and will

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Submission	Response
	<p>incorporate the proposed controls into their long-term network planning.</p> <p>Additionally, AEMO's 2024 Electricity Statement of Opportunities found no reliability gaps if planned projects proceed. The policy enhances resilience by promoting decentralised, renewable-powered systems. Unlike centralised gas infrastructure electric systems can be increasingly decentralised and integrated with renewable energy, batteries, and smart technologies. This flexibility supports local energy generation and storage, reduces vulnerability to energy shocks, and enables faster recovery during crises such as extreme weather or supply disruptions.</p>
<u>Request for more evidence or information to support electrification</u>	
<p>4 submissions requested more robust evidence or questioned the validity of claimed benefits. Submitters asked for independent expert input, expressed scepticism about health and cost claims.</p>	<p>The policy is informed by reputable studies from leading health and environmental organisations, including the CSIRO, Climate Council, Asthma Australia, and international bodies such as the World Health Organisation. These sources clearly demonstrate the benefits of electrification in terms of health, cost savings, equity and emissions reduction.</p> <p>Complementing this broader research, the City has commissioned independent, detailed technical analysis specific to the built environment to ensure the planning controls are practical, effective, and tailored to local conditions. This analysis was attached to the <i>Discussion Paper: Electrification of New Development</i>. The policy's development has also been shaped by extensive stakeholder engagement and public consultation.</p>
<u>Concerns about cost and economic impacts</u>	
<p>3 submissions raised concerns about increased electricity costs, fees for gas disconnection, and the financial burden of transitioning to all-electric systems. Submitters questioned the cost-effectiveness of the proposal and highlighted potential economic disadvantages for households and businesses. One submission raised concerns about potential job losses and risks to business viability due to electrification policies.</p>	<p>While some electric systems have higher upfront costs, they offer lower ongoing expenses and are becoming more affordable as markets mature. Electricity prices are expected to stabilise or decrease with growing renewable supply and infrastructure improvements, whereas gas prices are likely to rise due to shrinking markets and supply volatility. Avoiding gas infrastructure now also prevents costly future retrofits.</p>

Table 2: Industry groups and organisation submissions

Submitter	Submission	Response
Doctors for the Environment Australia	<p>The submission strongly supports the draft DCP, highlighting public health benefits by reducing exposure to indoor gas combustion products, particularly for residents and commercial kitchen workers.</p> <p>The submission stresses the occupational health risks for kitchen staff exposed to gas emissions and heat burden, especially in hot conditions, and acknowledges cultural resistance to change in the food industry.</p> <p>The submission supports the energy efficiency and cost-saving goals of the policy.</p> <p>The submission raised some concern about vagueness in the draft DCP as it relates to food and beverage and recommends specifying electrical infrastructure capacity for future full electrification of kitchens.</p>	<p>Support is noted.</p> <p>Post-exhibition amendment:</p> <p>A post-exhibition amendment has been recommended to the draft DCP to clarify that where an affected food and beverage tenancy chooses to use a gas connection, it must also provide sufficient space and electrical capacity to support the future replacement of all appliances with their electric alternatives. This includes requiring a maximum demand calculation estimate to ensure appropriate sizing. This will ensure kitchens are fully equipped for safe and complete electrification in line with the policy's objectives.</p>
Energy Consumers Australia	<p>The submission strongly supports the draft DCP mandating all-electric systems in new residential and large commercial developments. It asserts electrification is a vital climate action and critical consumer protection measure.</p> <p>The submission emphasises the benefits of preventing long-term lock-in to costly and outdated gas infrastructure, protecting vulnerable consumers, advocating for accelerated implementation, lowering thresholds, expanding controls to renovations, and tightening exemptions, especially for food and beverage premises in mixed-use developments.</p>	<p>Support is noted.</p> <p>The implementation timing reflects broad stakeholder feedback to allow developers, suppliers, and energy networks to prepare. The City recognises electrification impacts early feasibility and design decisions made 6 - 12 months before the lodgement of a development application.</p> <p>The commercial threshold aligns with the NSW Government's Sustainable Buildings SEPP. Developments under 1,000m² are relatively uncommon in the City and often face greater space and cost constraints for electrification. Targeting larger developments ensures a scalable, cost-effective approach that supports feasible implementation and industry transition.</p> <p>The draft DCP does not apply to renovations and alterations due to complexity and cost concerns, though the City continues to support voluntary electrification of existing buildings through targeted programs.</p> <p>Industry feedback highlighted practical challenges in commercial kitchens and the draft DCP permits gas connections in food and beverage tenancies provided embedded electrical infrastructure has sufficient capacity to support full electrification.</p> <p>Progress in this sector will be reviewed within one year of policy commencement.</p>
Property Council	<p>The submission supports the City's intent to electrify new developments and align with net zero targets. It notes the importance of ensuring feasibility, citing higher capital costs for developers during transition.</p>	<p>The City notes the Property Council's support is based on the proposed lead-in period and the application of the requirements to new developments only.</p>

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	<p>The submission supports the exclusion of alterations/additions and the proposed post-2026 start date.</p> <p>The submission welcomes further consultation on policy implementation and expansion to other asset classes, emphasising the need to consider economic impacts and align educational initiatives with market maturity.</p>	<p>Request for further consultation on future policy implementation and expansion to other asset classes is also noted. Aside from the scheduled review of the food and beverage sector, no further policy extensions are currently under consideration. Should this change, the City will engage closely with stakeholders to ensure a feasible, staged approach aligned with market readiness and industry capacity.</p>
Ausgrid	<p>The submission supports the draft DCP, recognising the economic, environmental, and health benefits of electrification. It highlights that requiring all-electric new developments is more cost-effective than retrofitting gas connections later, and that higher utilisation of existing electrical infrastructure can reduce costs for all consumers.</p> <p>Ausgrid supports the DCP's staged implementation and the exclusion of industrial properties for now, noting commercial electrification is progressing.</p> <p>Ausgrid advised that Sydney's electricity network, especially in the CBD, has significant capacity to meet forecast electrification demand due to reduced consumption from energy efficiency. Requiring all-electric development as standard improves predictability and enables more accurate network planning. Ausgrid does not expect major impacts on medium-term investments and will incorporate the requirements in long-term plans.</p> <p>They emphasise the value of electrification in improving network forecasting and investment planning and recommend early engagement with their connections team.</p> <p>Ausgrid also supports integrating EV infrastructure, solar and battery storage into building designs. They welcome further collaboration with the City and recommend future expansion of electrification policies to existing and industrial buildings.</p>	<p>Support is noted.</p> <p>Engagement with Ausgrid's connections team will continue to be prioritised to facilitate efficient implementation.</p>
Royal Institution of Chartered Surveyors	<p>The submission expresses strong support for the draft DCP and commends the City's leadership and highlights members' ongoing involvement in energy transition projects.</p> <p>The submission encourages other councils to adopt similar measures. It suggests future focus on assisting existing building stock in transitioning, especially for vulnerable or low-demand properties, and offers their expertise for future projects.</p>	<p>Support is noted.</p>
350 Australia and Healthy Futures	<p>The submission strongly supports the proposed expansion of all-electric requirements to include electric hot water in new residential buildings, full</p>	<p>Support is noted.</p> <p>The commercial threshold aligns with NSW's Sustainable Buildings SEPP, focusing on</p>

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	<p>electrification of large commercial buildings, and pre-wiring of food and beverage premises.</p> <p>The submission commends Council's leadership and practical, phased implementation and encourages future expansion to include all commercial buildings.</p>	<p>commercial developments over 1,000m² where electrification is most practical.</p>
Global Cooksafe Coalition	<p>The submission strongly supports the draft DCP, highlighting benefits for chefs, kitchen operators, and hospitality workers. It commends the policy's flexibility for commercial kitchens while promoting a safer, healthier, and more cost-effective transition away from gas cooking.</p> <p>The submission notes economic and occupational advantages including long-term cost savings, improved air quality, and reduced heat stress.</p> <p>GCC members, partners, and ambassador chefs commit to no gas in new kitchens by 2030 and transitioning existing kitchens by 2040, with backing from high-profile chefs and leading property companies.</p> <p>The submission recommends future support for hospitality venues through demonstration kitchens, grants, and incentives to assist retrofits.</p> <p>The submission concludes that the City's approach is balanced, industry-informed, and benefits health, workers, and the environment.</p>	<p>The City is a signatory of GCC and remains committed to ongoing collaboration. In June 2025, Council resolved that a report will be provided within one year of the planning controls commencing, detailing progress on electrification within the food and beverage sector. This process will include continued engagement with the GCC and industry stakeholders to ensure sustained support and responsiveness to the sector's needs.</p>
Urban Taskforce	<p>The submission strongly opposes the draft DCP, arguing the policy is premature, rushed and lacks adequate planning for implementation.</p> <p>The submission raises concerns about unrealistic timeframes, pressure on the electricity network, increased development and compliance costs, reduced project viability, and negative impacts on housing affordability and supply. It recommends a consistent, state-wide approach and exemptions for affordable, key worker, and build-to-rent housing.</p> <p>The submission warns the controls will burden developers with infrastructure upgrades, such as substations, that reduce usable floorspace and increase apartment prices.</p> <p>The submission argues electrification will not be cost-neutral and may raise short-term emissions compared to gas. It suggests removing gas may reduce buyer appeal due to consumer preferences, further affecting project feasibility.</p> <p>The submission notes electrification infrastructure could compromise active street frontages and building design.</p> <p>The submission criticises the City's consultation process, questions its jurisdiction to ban certain technologies without state alignment, and calls for</p>	<p>The lead-in time of the policy reflects thorough consultation with stakeholders. This supports market readiness, infrastructure planning, and supplier capacity building.</p> <p>Ausgrid has confirmed that the network currently has sufficient capacity and flexibility to support most electrification scenarios. Moreover, the policy applies only to new developments, enabling a gradual transition rather than sudden demand spikes. The City continues to collaborate with Ausgrid to monitor capacity and ensure system resilience.</p> <p>Initial capital costs may be higher but are expected to decline as technologies mature, demand grows and supply chains develop. Network augmentation - such as substations - is often necessary regardless of gas or electric systems, and well-designed load management can reduce infrastructure burdens. Ausgrid is also working to review cost allocations and improve transparency through hosting capacity maps to improve developers' ability to plan and manage electrification costs.</p> <p>Energy-efficient all-electric designs reduce ongoing energy expenses for residents, improving affordability in the long term. Avoiding fossil fuel gas infrastructure in new buildings prevents costly future retrofits which can ultimately burden the community</p>

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	<p>the policy to be paused pending a cost-benefit analysis and engagement with the NSW Government.</p>	<p>and housing market. Vulnerable households - including those in affordable housing - are most at risk from rising gas prices and the shrinking gas user base, which can lead to higher costs passed on to those who remain connected. Ensuring electrification requirements apply to these housing types is essential to prevent locking in fossil fuel dependency and avoid placing disproportionate financial burdens on vulnerable residents, supporting a fair and equitable transition for all communities.</p> <p>Acknowledging that some buyers prefer gas, the City's data shows nearly 90,000 residential gas connections across the local area, ensuring ample availability of gas-connected homes. Since the policy applies only to new developments, choice remains available in the existing housing stock and allows the market to gradually transition without removing existing choice.</p> <p>Infrastructure, such as plant rooms and electrical equipment, is excluded from Gross Floor Area (GFA) calculations. This ensures that necessary electrical systems can be incorporated without reducing leasable or occupiable space.</p> <p>The rapid decarbonisation of the electricity grid - forecasted to reach 82% renewable by 2030 - means that electric buildings powered by renewables will achieve significantly lower lifecycle emissions over time. Given that buildings typically last for many decades, decisions made now have long-term impacts. Any short-term emission variations are outweighed by the clear, lasting benefits of a cleaner, renewable-powered electricity system.</p> <p>The City supports a consistent, state-wide approach to electrification and continues to advocate for this. Local councils have a role to set DCP requirements that reflect local priorities and community expectations. The proposed controls are the result of thorough consultation and align with state and national climate goals, including NSW's net zero target and the draft National Construction Code.</p>
<p>Business Sydney</p>	<p>The submission opposes the draft DCP citing concerns over loss of consumer choice, increased costs for households and businesses, electricity grid reliability risks, potential job losses in the gas sector, environmental trade-offs, and poor timing given other pressing urban issues. It argues the draft DCP is an example of local government overreach and recommends voluntary electrification, grid investment, and support for clean gas alternatives instead.</p>	<p>The policy only applies to new developments and does not restrict consumer choice in the existing market - nearly 90,000 gas-connected homes remain in the local area. All-electric buildings have lower running costs and improved energy efficiency, benefiting households and businesses over time. Ausgrid has confirmed the grid can support electrification in the medium term, and the City continues to coordinate closely on planning and capacity.</p> <p>It is appropriate for councils to use local planning tools to improve health, equity and cost-of-living outcomes for their communities.</p>

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		<p>The City supports voluntary electrification for existing buildings through current programs. However, mandating electrification in new developments prevents locking in long-term fossil fuel use, which is costly and difficult to retrofit. Designing all-electric systems from the outset is far more efficient, enabling the City to focus incentives and support on helping existing buildings transition, should they choose to.</p> <p>The controls apply only to fossil fuel gas connections in new developments and do not restrict the use of renewable gases in the future.</p>
Jemena	<p>The submission acknowledges the City's efforts but urges recognition of renewable gases (biomethane, hydrogen) as essential to decarbonisation pathways. It stresses that renewable gas markets are emerging rapidly, supported by policy and industry initiatives, and warns that the proposed all-electric controls may prematurely restrict renewable gas developments, risking investor confidence and limiting options for customers dependent on gaseous fuels.</p> <p>The submission advocates for flexible, inclusive planning controls accommodating renewable gas infrastructure alongside electrification.</p>	<p>The draft DCP applies only to fossil fuel gas connections and does not restrict connections to a renewable gas network.</p>

Appendix A

The consultation was promoted via the City of Sydney's Sydney Your Say eNews, which was distributed to approximately 5,000 subscribers in July and August 2025. This included a direct link to the consultation webpage and survey. An example of the newsletter article is included in Figure 1.

Additionally, social media posts were published on the City's LinkedIn and Instagram platforms in June 2025, directing users to the consultation page. An example of one of these posts is shown in Figure 2.



Photo: Jamie Williams / City of Sydney

Proposal to support all-electric new homes, offices and hotels

We're asking for feedback on a requirement for new residential accommodation and larger office buildings, hotels and serviced apartments to be all electric.

Review the proposal and provide feedback by Tuesday 12 August

[Read more](#)

Figure 1 – Sydney Your Say eNews newsletter

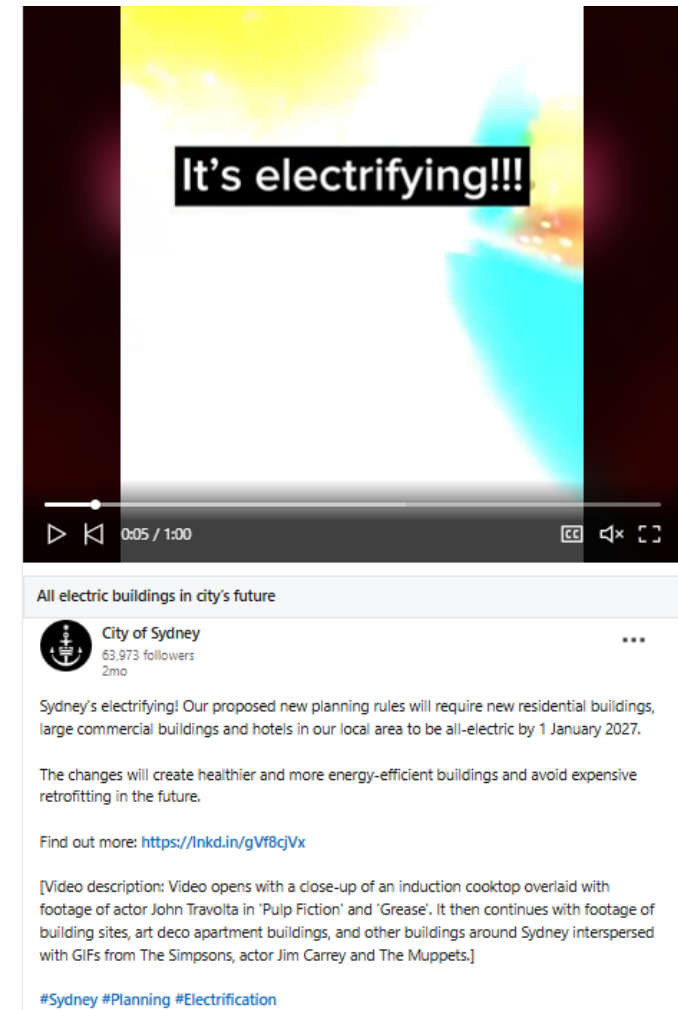


Figure 2 – Social media post

