# **10.4.** Draft Electric Vehicle Charging on Public Land Policy - post-exhibition report

| AUTHOR      | Danielle Birkbeck, Team Leader Sustainability                         |  |  |  |
|-------------|---|--|--|--|
| ENDORSED BY | Marcelo Occhiuzzi, Director Planning and Environment                  |  |  |  |
| ATTACHMENTS | Draft Electric Vehicle Charging on Public Land Policy - Responses     |  |  |  |
|             | to Submissions Summary [ <b>10.4.1</b> - 16 pages]                    |  |  |  |
|             | 2. JOLT Submission [ <b>10.4.2</b> - 4 pages]                         |  |  |  |
|             | 3. Electric Vehicle Charging on Public Land Policy [10.4.3 - 7 pages] |  |  |  |
| CSP LINK    | Outcome 1 – A healthy environment with thriving ecosystems and        |  |  |  |
|             | strong climate resilience   |  |  |  |
|             | E3. Build climate resilience  |  |  |  |

#### **PURPOSE:**

The purpose of this report is to inform Council of the outcomes of community consultation on the draft Electric Vehicle Charging on Public Land Policy, and the proposed changes based on the submissions received.

#### **EXECUTIVE SUMMARY:**

- The draft Electric Vehicle Charging on Public Land Policy was placed on public exhibition from 13 August 2025 to 10 September 2025.
- 14 submissions were received. Responses were largely supportive of the Policy, noting environmental benefits and the need for infrastructure to support the transition to electric vehicles.
- Some submissions highlighted concerns regarding limited availability of parking, costs to Council, and preference of vehicles to charge on private land. Several submissions addressed the Policy stance of not supporting advertising-enabled charging infrastructure.
- Minor changes have been made to the Policy based on the responses.

#### **RECOMMENDATION:**

**1. THAT** Council adopt the Electric Vehicle Charging on Public Land Policy following its exhibition and consideration of submissions received.

# **Background**

At its meeting on 28 July 2025, Council resolved:

- 1. THAT Council endorse the draft Electric Vehicle Charging on Public Land Policy and place it on public exhibition for a period of 28 days.
- 2. THAT a further report come back to Council following the engagement process as per Recommendation 1 above, outlining any submissions received.

This report outlines the submissions received and details the proposed amendments to the draft Policy in response.

#### Report

#### 1. Public Exhibition

The draft Electric Vehicle Charging on Public Land Policy was placed on public exhibition from 13 August 2025 to 10 September 2025. The engagement statistics from the exhibition period are shown in Table 1 below.

| <b>Engagement Method</b> | Results   |
|--------------------------|---|
| Your Say website         | Total page views: 670                                     |
|                          | Total unique visitors: 402                                |
|                          | Aware Stakeholders: 362                                   |
|                          | Informed Stakeholders: 56                                 |
|                          | Engaged Stakeholders: 12                                  |
|                          | Policy viewed/downloaded: 76 by 57 unique visitors        |
|                          | Submissions received: 12                                  |
| Email Submissions        | 2 email submissions                                       |
| E-newsletters            | Featured in 4 eNewsletters:                               |
|                          | - Council's August eNewsletter – 1,051 recipients opened, |
|                          | 3 clicks from 1 unique visitor                            |
|                          | - Precinct eNews 22 to 28 August - 255 recipients opened, |
|                          | 3 clicks from 3 unique visitors                           |
|                          | - Precinct eNews 29 August to 4 September - 224           |
|                          | recipients opened, 4 clicks from 4 unique visitors        |
|                          | - Precinct eNews 5 to 11 September - 229 recipients       |
|                          | opened, 2 clicks from 2 unique visitors                   |
| Social Media Posts       | Instagram   |
|                          | - Reach: 668  |
|                          | - Likes: 11   |
|                          | - Shares: 1   |
|                          | - Link clicks via Council's Linktree: 8                   |
|                          | Facebook  |
|                          | - Reach: 681  |
|                          | - Likes: 3  |
|                          | - Link clicks: 8  |

Table 1. Public Exhibition Engagement Statistics

#### 2. Submissions Received

14 submissions were received in response to the exhibition of the draft Policy. The content of the submissions and the responses to the issues raised are summarised in Attachment 1 to this report. Attachment 2 incudes the full submission from a business whose response was summarised in Attachment 1.

Submissions were largely supportive of the Policy, noting the environmental benefits of electric vehicles and the need for more charging infrastructure to support the transition. A small number of submissions did not support the Policy, highlighting concerns including the limited availability of parking that already exists in the Local Government Area (LGA), the preference for vehicles to charge at home or on private land, and the view that installation of Electric Vehicle Charging Infrastructure is a waste of public money.

Noting the high-density nature of the LGA with little off-street parking for residents, the Policy will ensure that Council allocates a proportionate number of Electric Vehicle (EV) charging to reflect community needs. In addition, based on submissions received, the Policy will be amended to include that current parking restrictions will apply and any changes to existing time limits or restrictions will be considered on a case-by-case basis, referencing surrounding land-use and the purpose of the existing kerbside parking restrictions. In addition, the Policy states that installation, use, maintenance, and decommissioning of electric vehicle charging infrastructure (ECVI) will be at no cost to Council, hence there will be no use of public funds.

Several of the submissions referred to, and supported the inclusion of, an advertising-enabled EVCI business model, offered by one electric vehicle charge point operator. The submissions were supportive of the free 7kW charging that this Charge Point Operator (CPO) offers and suggested that advertising was a sensible way to assist with funding the EVCI.

The Policy states that advertising enabled EVCI will not be supported. Reasons for this include:

- visual and public amenity impacts (visual pollution and streetscape aesthetics, obstruction of sight lines);
- over-commercialisation of public spaces (diminishes sense of civic space and local character, Council does not want to set a precedent for further infrastructure monetisation);
- distraction and safety risks (increased risks near intersections, schools, and crossings, distraction for drivers, cyclists, and pedestrians, and light spill issues); and
- equity and social concerns (disproportionate impacts in high traffic areas, concerns that public space should not be traded for the benefit of a narrow demographic).

Council's adopted transport objective is to build a connected LGA where safe, active, and sustainable travel is preferred. Subsidising customer costs of charging infrastructure by negatively impacting amenity through advertisements could undermine efforts to support a shift towards walking, cycling, and public transport. Should Council's policy position change in future, this may be revisited.

# **3. Proposed Amendments**

In response to the submissions received, there are minor changes proposed to the draft Policy as outlined in Table 2 below. Attachment 3 outlines the updated Policy, ready for Council's consideration and adoption.

| Section             | Wording in Draft Policy      | Proposed New Wording for Policy           |
|---------------------|------------------------------|---|
| 4. Principles       | Ensure the equitable         | Ensure the equitable distribution of      |
| Equitable           | distribution of EVCI to      | EVCI to provide fair access for all       |
|                     | provide fair access for all  | people, including lower resourced         |
|                     | groups, including lower      | residents and those without private       |
|                     | resourced residents and      | charging options and minimise             |
|                     | those without private        | reliance on public land for private       |
|                     | charging options.            | vehicle use.                              |
| 4. Principles       | This includes using, where   | This includes using, where possible,      |
| Infrastructure      | possible, existing           | existing infrastructure to install EV     |
| Expansion and       | infrastructure to install EV | charging assets within the public         |
| Optimisation        | charging assets within the   | domain to minimise footprint and          |
|                     | public domain to minimise    | visual impact.                            |
|                     | further footprint.           |   |
| 5. Provisions       | Where possible, existing     | Where possible, existing                  |
| Site Selection      | infrastructure is to be used | infrastructure is to be used to install / |
|                     | to install / deploy EVCI to  | deploy EVCI to minimise footprint         |
|                     | minimise footprint.          | and visual impact.                        |
| 5. Provisions       | CPOs are responsible for     | CPOs are responsible for checking         |
| Safety, Risk and    | checking and maintaining     | and maintaining the EVCI.                 |
| Compliance          | the EVCI. Applications must  | Applications must include a schedule      |
|                     | include a schedule for       | for regular, preventative and reactive    |
|                     | regular, preventative and    | maintenance. CPO contact details          |
|                     | reactive maintenance.        | are clearly visible on the EVCI to        |
|                     |                              | rectify any issues.                       |
| 5. Provisions       | CPOs are required to         | CPOs are required to <b>comply with</b>   |
| Council Partnership | indicate current parking     | existing kerbside parking restrictions    |
| and Data            | restrictions at the proposed | at the proposed location. Council         |
| Management          | location and advise if a     | may consider requests from CPOs to        |
|                     | change is required.          | change parking restrictions on a          |
|                     | Preference for dedicated     | case-by-case basis with                   |
|                     | parking bays to match        | consideration of the surrounding          |
|                     | surrounding parking limits,  | landuse and the purpose of the            |
|                     | however, to be determined    | existing kerbside parking                 |
|                     | on a case-by-case basis.     | restrictions.                             |

Table 2. Proposed Amendments

# **Consultation requirements**

Community engagement has occurred in accordance with Council's Community Engagement Strategy. The detail of this report provides the outcomes from the engagement for Council to consider prior to adoption.

# **Financial/Resource Implications**

There will be no cost to Council for infrastructure installation, and a new revenue stream is created.

Implementation of the Policy will require modest amounts of staff time to assess applications.

# Legislation

State Environmental Planning Policy - Transport and Infrastructure (the SEPP) 2021 - Subdivision 3 Electric Vehicle Charging Units applies.

Local Government Act 1993 gives councils the authority to regulate charging infrastructure, parking, and road use within their jurisdictions. It also allows councils to support EV adoption through planning policies, incentives, and installation of public charging stations.

#### **ATTACHMENT 1**

# DRAFT ELECTRIC VEHICLE CHARGING ON PUBLIC LAND POLICY Summary of submissions received during public exhibition period (13 August - 10 September 2025)

The following criteria are used to analyse all submissions received, and to determine whether or not the policy would be amended:

- 1. The Draft Electric Vehicle Charging on Public Land Policy would be amended if issues raised in the submission:
  - a provided additional information of relevance.
  - b indicated or clarified a change in government legislation, Council's commitment or management policy.
  - c proposed strategies that would better achieve or assist with Council's objectives.
  - d was an alternate viewpoint received on the topic and is considered a better option than that proposed or;
  - e indicated omissions, inaccuracies or a lack of clarity.
- 2. The Draft Electric Vehicle Charging on Public Land Policy would not be amended if the issues raised in the submission:
  - a addressed issues beyond the scope of the proposal.
  - b was already in the proposal or will be considered during the development of a subordinate plan (prepared by Council).
  - c offered an open statement, or no change was sought.
  - d clearly supported the proposal.
  - e was an alternate viewpoint received on the topic but the recommendation was still considered the best option.
  - f was based on incorrect information.
  - g contributed options that are not possible (generally due to some aspect of existing legislation or government policy) or; involved details that are not appropriate or necessary for inclusion in a document aimed at providing a strategic community direction over the long term.

Name and address withheld (use this to copy and paste below as necessary, then delete)

| No. | Suburb           | Key Points Raised  | Council Response   | Recommende d Action | Criteri<br>a |
|-----|------------------|--|--|---------------------|--------------|
| 1   | Neutral Precinct | Neutral Precinct passed the following Motion at the 9 September meeting: MOTION The Precinct supports the Council establishing EV charging spots on public land in a managed way. Restrictions should be put in place to require drivers to leave the EV charging spot when the charge to their vehicle is complete. Power costs should be fully incurred by the vehicle owner and not subsidised by the Council. VOTE: Unanimous (11) | Submission is noted. The Policy states that installation, use, maintenance and decommissioning of EVCI will be at no cost to Council. EVCI locations will have signage that stipulates EV only while charging. | No action           | 2c           |
| 2   | North Sydney     | We need more EV charging at North Sydney. I have used Jolt charger many times and very happy with their company.   | Submission is noted.  The Policy will facilitate the installation of additional EVCI in the LGA.   | No action           | 2c           |

| No. | Suburb         | Key Points Raised  | Council Response  | Recommende d Action | Criteri<br>a |
|-----|----------------|--|---|---------------------|--------------|
| 3.  | Cammeray       | We need as many chargers as possible - EV is the way of the future. Advertising is a sensible way to assist with funding and shouldn't preclude chargers such as Jolt.   | Submission is noted.  The Policy states that installation, use, maintenance and decommissioning of EVCI will be at no cost to Council.  The Policy states advertising enabled EVCI will not be supported. Reasons for this include:  - visual and public amenity impacts (visual pollution and streetscape aesthetics; obstruction of sight lines)  - overcommercialisation of public spaces (diminishes sense of civic space and local character; do not want to set precedent for further infrastructure monetisation)  - distraction and safety risks (increased risks near, intersections, schools, crossings; distraction for drivers, cyclists and pedestrians; light spill)  - equity and social concerns (disproportionate impacts in high traffic areas; public space should not be traded for the benefit of a narrow demographic). | No action           | 2e           |
| 4.  | McMahons Point | I hope the Council can keep up with other Council areas like Woollahra and Randwick to provide more charging options in our beautiful area. I recently got back from Guangzhou, China and having stepped foot back here it felt like a step into the past in some respects. They had over 90 percent evs on their roads which meant I could breathe fresh air and it was so peaceful; no loud engines, no toxic fumes, no headaches. | Submission is noted. The Policy will facilitate the installation of more public chargers in the LGA.  | No action           | 2c           |

| No. | Suburb   | Key Points Raised   | Council Response  | Recommende d Action | Criteri<br>a |
|-----|----------|---|---|---------------------|--------------|
| 5.  | Cremorne | I do not support the proposal as EV charging spots alienate parking spots from the majority of vehicles and parking is already in short supply. | Submission is noted and Council acknowledges parking is limited in the LGA.  Council will allocate a proportionate number of EV charging bays, ensuring it is reflective of community uptake and demand for electric vehicles. Provision of dedicated bays supports the community transition to electric vehicles that is already underway. | No action           | 2e           |

| No. | Suburb         | Key Points Raised  | Council Response   | Recommende d Action | Criteri<br>a |
|-----|----------------|--|--|---------------------|--------------|
| 6.  | Cremorne Point | First big question - what is public land? Does this mean Council land, Crown land, public roads, etc etc?  Who pays for the installation?  As a general statement, bike lanes have taken up much space at a great cost and frankly and hardly used. I live in the NSC and rarely see a bike rider and if they are one, they are transiting NSC on the way to the city. Casual bike riders are never seem - many many more people walk.  Will a DA be lodged to set up a charging spot (a DA should be raised)? | Submission is noted.  Public land is land that is owned or managed by a public authority such as a Council. With regards to the Policy, it is specific to Council owned land and car parks. Crown land is public land owned by the State (the Crown) and managed by State agencies or sometimes delegated to Councils.  The Policy states that installation, use, maintenance and decommissioning of EVCI will be at no cost to Council.  There are various approval pathways for the installation of EVCI under the State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP). A development application (DA) is not required for all pathways, only those installations that require development with consent.  The planning approval pathways include:  • Exempt development: relates to very lowimpact development. If the proposed works meet all development standards identified in the State Policy, approval is not needed from Council.  • Development with consent: refers to a development that will need approval from a consent authority such as a council or the Planning Minister.  • Development without consent: this applies to activities done by councils, NSW Government departments or agencies, or private bodies deemed to be public authorities. A public authority supply authorities is permissible as exempt development. | No action           | 2a and 2c    |

| No. | Suburb       | Key Points Raised   | Council Response   | Recommende d Action | Criteri<br>a |
|-----|--------------|---|--|---------------------|--------------|
| 7.  | North Sydney | Prefer EVs be charged at home or in commercial premises where the owner needs to pay for the electricity and not take up valuable, scarce public parking spaces. They should be able to charge at home or in commercial spaces. | Submission noted.  The Policy states that installation, use, maintenance and decommissioning of EVCI will be at no cost to Council.  Council will allocate a proportionate number of EV charging bays, ensuring it is reflective of community needs. | No action           | 2e           |
|     |              |   | To date, Council has installed 60 EV chargers in Council owned carparks for the community.   |                     |              |

| 8. | Sydney | 1. Concentration of Charging  | Submission is noted.   | No action | 2e |
|----|--------|---|--|-----------|----|
|    |        | Infrastructure— encouraging a mix of charging speeds and models to meet diverse community needs.  - Different charging use cases: A slow pole-mounted AC charger serves overnight residential demand, whereas a DC fast charger serves short-stay commercial areas. Both can coexist in close proximity without overlap of use cases Equity of access: Free charging models serve different demographics than paid models, making the network more inclusive Network effect: More chargers often generate higher, not lower, utilisation.  2. Prohibition of Advertising-Enabled Chargers — highlighting the risks of exclusion, and proposing a more balanced approach.  • Delivers free charging: Advertising revenue directly funds JOLT's free 7kWh daily charging provision, supporting equity and affordability. This is the social license to operate the advertising.  • De-risk: Revenues derived solely from energy margin sales opens this capital intensive and high ongoing cost industry to several risks affecting long-term viability. Having a secondary revenue stream ensures long-term viability of the model | Councils adopted transport objective is to build a connected LGA where safe, active and sustainable travel is preferred. Subsidising customer costs of charging infrastructure by negatively impacting amenity through advertisements could undermine efforts to support a shift towards walking, cycling and public transport.  The Policy states advertising enabled EVCI will not be supported. Reasons for this include:  - visual and public amenity impacts (visual pollution and streetscape aesthetics; obstruction of sight lines)  - overcommercialisation of public spaces (diminishes sense of civic space and local character; do not want to set precedent for further infrastructure monetisation)  - distraction and safety risks (increased risks near, intersections, schools, crossings; distraction for drivers, cyclists and pedestrians; light spill)  - equity and social concerns (disproportionate impacts in high traffic areas; public space should not be traded for the benefit of a narrow demographic). |           |    |

- Ensures reliability: Advertising revenue is reinvested into charger uptime (>98%) and maintenance. A dual-revenue model de-risks operations and guarantees long-term viability. Intrinsic market forces which attract advertisers to display their content on advertising screens also reinforces the high performance of advertising-enabled chargers.
- Supports Council communication: JOLT screens can be used for local event promotion, sustainability campaigns, or emergency messaging in collaboration with Council.
- Future Proofing: JOLT can upgrade technology to be in line with market expectations. As the Industry continues to evolve, what is appropriate now, may not be suitable in 5-10 years time. The additional revenue stream enables JOLT to move with the market and deliver future-proofed solutions.
- Supported by planning frameworks:
  The NSW State Environmental Planning
  Policy (Transport and Infrastructure) 2023
  Amendment provides clear pathways for
  advertising-enabled charging units. In
  collaboration with external town planning
  consultants and Council stakeholders,
  JOLT will identify and navigate the
  appropriate planning pathway for
  deploying advertising-enabled EV
  charging units.
- Public/Private Community
  Infrastructure: The model of privately
  funded public infrastructure has been in
  operation for decades and has proven to

be a very effective way for Councils to provide additional amenity to its ratepayers without using public funds. When there is a clear value exchange and an understanding of the social license to operate the advertising (i.e. free charging for the community, access to fast, public charging), commercial advertising has been broadly supported by ratepayers as an appropriate means of funding infrastructure. To address concerns about proliferation, Council could trial a capped number of advertising-enabled chargers over the first two years (e.g. 10 units), and assess utilisation, amenity, and community benefit before expanding. This approach is consistent with how other councils have successfully introduced the model. JOLT will closely collaborate with Council to ensure the unique local character is maintained and enhanced to ensure maximum benefit can be derived from this infrastructure. Clear Demand for this Infrastructure Currently there are no JOLT chargers in the North Sydney LGA. In spite of this, there are 196 JOLT users who have an EV registered in North Sydney. This represents 13% of all North Sydney EV owners (1,658 as of 30 August 2025). These EV owners are driving outside of their LGA to obtain a service that could be made within their own LGA. This is a suboptimal outcome for all stakeholders e.g. more congestion on roads, lost productivity and the erosion of the free charging element. Around 25% of all

| No. | Suburb | Key Points Raised  | Council Response | Recommende d Action | Criteri<br>a |
|-----|--------|--|------------------|---------------------|--------------|
|     |        | sessions at our Beecroft charger come from North Sydney residents. JOLT would like to share insights such as these to work collaboratively to solve transport challenges faced by the LGA. It is neither sustainable nor equitable for residents to travel outside the LGA for charging that meets their needs.  Charging Site Approval Process  JOLT strongly supports the streamlined approval process proposed in the Policy. A transparent and efficient pathway will accelerate delivery of essential infrastructure while maintaining appropriate due diligence. We encourage other councils to follow North Sydney's example. |                  |                     |              |

| No. | Suburb   | Key Points Raised  | Council Response   | Recommende d Action | Criteri<br>a |
|-----|----------|--|--|---------------------|--------------|
| 9.  | Cammeray | I do not see why advertising enables chargers should be excluded in North Sydney. I agree they should not be an eye sore, but if the business model works it provides better infrastructure options for residents. | Submission is noted.  The Policy states advertising enabled EVCI will not be supported. Reasons for this include:  - visual and public amenity impacts (visual pollution and streetscape aesthetics; obstruction of sight lines)  - overcommercialisation of public spaces (diminishes sense of civic space and local character; do not want to set precedent for further infrastructure monetisation)  - distraction and safety risks (increased risks near, intersections, schools, crossings; distraction for drivers, cyclists and pedestrians; light spill)  - equity and social concerns (disproportionate impacts in high traffic areas; public space should not be traded for the benefit of a narrow demographic).  There is no evidence that advertising enabled EVCI provides better infrastructure options for residents and Council already has a number of DC fast chargers in Council owned carparks. | No action           | 2e           |

| No. | Suburb       | Key Points Raised  | Council Response  | Recommende d Action | Criteri<br>a |
|-----|--------------|--|---|---------------------|--------------|
| 10. | North Sydney | Jolt is a fantastic company and provides free reliable charging. I have been using them at Forestville for years. You should allow them to install their public chargers. I have 3 full electric EVs and have had so for 5 years. Tesla and Jolt are the only two companies that provide reliable charging. You'd be wasting public money if you allow anyone else build charging infrastructure as in my experience they are broken down and unusable 80% of the time. This specially applies to NRMA & Exploren. | Submission is noted.  The Policy states that installation, use, maintenance and decommissioning of EVCI will be at no cost to Council, hence there will be no misuse of public funds.  The Policy states that EVCI meets a minimum 98% uptime meaning the chargers are usable 98% of the time. Council currently has 60 EV chargers in the LGA meeting this requirement.  The Policy states advertising enabled EVCI will not be supported. Reasons for this include:  - visual and public amenity impacts (visual pollution and streetscape aesthetics; obstruction of sight lines)  - overcommercialisation of public spaces (diminishes sense of civic space and local character; do not want to set precedent for further infrastructure monetisation)  - distraction and safety risks (increased risks near, intersections, schools, crossings; distraction for drivers, cyclists and pedestrians; light spill)  - equity and social concerns (disproportionate impacts in high traffic areas; public space should not be traded for the benefit of a narrow demographic). | No action           | 2e           |

| No. | Suburb   | Key Points Raised  | Council Response  | Recommende<br>d Action | Criteri<br>a |
|-----|----------|--|---|------------------------|--------------|
| 11. | Waverton | Hi, we have recently purchased a plug in hybrid (BYD Sealion 6). We have only off street parking, so no access to a garage charger, and so are reliant on public chargers. I have used Jolt at other locations in Sydney but understand that as they include advertising, they will not be considered. I do like their 7 kWh free service, so it would be great if they could be included as an operator of EV charging points in the North Sydney area. Around Tunks St Waverton where I live would be great! | Councils adopted transport objective is to build a connected LGA where safe, active and sustainable travel is preferred. Subsidising customer costs of charging infrastructure by negatively impacting amenity through advertisements could undermine efforts to support a shift towards walking, cycling and public transport.  The Policy states advertising enabled EVCI will not be supported. Reasons for this include:  - visual and public amenity impacts (visual pollution and streetscape aesthetics; obstruction of sight lines)  - overcommercialisation of public spaces (diminishes sense of civic space and local character; do not want to set precedent for further infrastructure monetisation)  - distraction and safety risks (increased risks near, intersections, schools, crossings; distraction for drivers, cyclists and pedestrians; light spill)  - equity and social concerns (disproportionate impacts in high traffic areas; public space should not be traded for the benefit of a narrow demographic).  To date, Council has installed a mix of 60 fast and slow EV chargers in locations around the LGA. | No action              | 2e           |

| No. | Suburb         | Key Points Raised   | Council Response   | Recommende d Action | Criteri<br>a |
|-----|----------------|---|--|---------------------|--------------|
| 12. | Wollstonecraft | I think advertisement enabled chargers should be allowed because they can provide a lower charging price to me as a consumer. | Councils adopted transport objective is to build a connected LGA where safe, active and sustainable travel is preferred. Subsidising customer costs of charging infrastructure by negatively impacting amenity through advertisements could undermine efforts to support a shift towards walking, cycling and public transport.  The Policy states advertising enabled EVCI will not be supported. Reasons for this include:  - visual and public amenity impacts (visual pollution and streetscape aesthetics; obstruction of sight lines)  - overcommercialisation of public spaces (diminishes sense of civic space and local character; do not want to set precedent for further infrastructure monetisation)  - distraction and safety risks (increased risks near, intersections, schools, crossings; distraction for drivers, cyclists and pedestrians; light spill)  - equity and social concerns (disproportionate impacts in high traffic areas; public space should not be traded for the benefit of a narrow demographic). | No action           | 2e           |

| No. | Suburb           | Key Points Raised  | Council Response  | Recommende d Action | Criteri<br>a |
|-----|------------------|--|---|---------------------|--------------|
| 13. | Email submission | I support this policy and encourage its expansion. I encourage Council to work with Ausgrid, which has publicly stated a goal of 11,000 public chargers using their power poles. Ideal for our LGA. Given Council's finances, I would encourage Council to reconsider the ban on charging facilities that include advertising. | Submission is noted.  Councils adopted transport objective is to build a connected LGA where safe, active and sustainable travel is preferred. Subsidising customer costs of charging infrastructure by negatively impacting amenity through advertisements could undermine efforts to support a shift towards walking, cycling and public transport.   | No action           | 2e           |
|     |                  |  | The Policy states advertising enabled EVCI will not be supported. Reasons for this include:  - visual and public amenity impacts (visual pollution and streetscape aesthetics; obstruction of sight lines)  - overcommercialisation of public spaces (diminishes sense of civic space and local character; do not want to set precedent for further infrastructure monetisation)  - distraction and safety risks (increased risks near, intersections, schools, crossings; distraction for drivers, cyclists and pedestrians; light spill)  - equity and social concerns (disproportionate impacts in high traffic areas; public space should not be traded for the benefit of a narrow demographic). |                     |              |
|     |                  |  | Councils approved fees and charges for EVCI are applicable to all charge point operators (CPO's). Council currently has 60 chargers in the LGA and licence agreements with 3 CPOs who are paying the adopted fees.  |                     |              |

| No. | Suburb           | Key Points Raised  | Council Response  | Recommende d Action    | Criteri<br>a |
|-----|------------------|--|---|------------------------|--------------|
| 14. | Email Submission | Wording changes:  - Principles: Equitable – include minimise reliance on public land for private vehicle use.  - Principles: Infrastructure Expansion and Optimisation - Include minimise footprint and visual impact  - Provisions: Site Selection - Include minimise footprint and visual impact  - Provisions: Safety, Risk and Compliance – include CPO contact details are clearly visible on the EVCI to rectify any issues.  - Provisions: Council Partnership and Data Management - CPOs are required to comply with existing kerbside parking restrictions at the proposed location. Council may consider requests from CPOs to change parking restrictions on a caseby-case basis with consideration of the surrounding landuse and the purpose of the existing kerbside parking restrictions. | Submission is noted.  Agree with wording changes to ensure alignment with objectives and targets set out in Councils key strategic documents. | Update draft<br>Policy | 2a<br>2e     |

Level 24, 300 Barangaroo Ave Sydney NSW 2000 Australia



Monday, 1 September 2025

#### Ms Danielle Birkbeck

Manager Environmental Services North Sydney Council 200 Miller St, North Sydney NSW 2060

#### JOLT feedback to the Draft North Sydney Electric Vehicle Charging on Public Land Policy

Dear Ms Birkbeck,

JOLT Charge Pty Limited (**JOLT**) welcomes the opportunity to provide feedback on North Sydney Council's (**North Sydney** or **Council**) Draft Electric Vehicle (**EV**) Charging on Public Land Policy (the **Policy**). We strongly support Council's leadership in planning for a zero-emission future and in engaging with community, industry, and government stakeholders to ensure the Policy is both practical and forward-looking.

JOLT is an Australian owner and operator of fast DC public EV charging infrastructure, with more than 100 25–50kW chargers deployed across Sydney, Melbourne, Brisbane and Adelaide, as well as many international locations. Our model provides free, fast, 100% renewable charging to the community, addressing key barriers to EV ownership: range anxiety, availability of public charging, and the cost of EV use.

Through our advertising-enabled charging units, JOLT is able to provide 7kWh free charging every 24 hours (around 50km of driving range), which exceeds the average daily distance driven in Australian capital cities (on average 30-33 kms per day). Advertising revenue not only supports this free service, it dramatically enhances the commercial viability of the offering and ensures proactive maintenance provides long term reliability, all at no cost burden to Councils or ratepayers.

JOLT has previously engaged with North Sydney staff across Sustainability, Parking, Transport and Planning, and we welcome the opportunity to continue collaborating to support Council's climate and transport objectives.

#### **Executive Summary**

JOLT commends North Sydney's leadership in accelerating EV adoption, demonstrated through participation in the NSW Kerbside Charging Program, fleet transition, and policy development. The Policy is clear and well-structured, and the simplified site approval process is an excellent step toward enabling much-needed charging infrastructure.

However, we are concerned that the proposed prohibition on advertising-enabled charging infrastructure risks undermining the Policy's own principles of equity, accessibility, and sustainability. Banning this model would restrict innovation, reduce infrastructure investment, and delay delivery of affordable charging options for the community.

Our submission therefore focuses on three key areas:

• **Concentration of Charging Infrastructure** (Site Selection) – encouraging a mix of charging speeds and models to meet diverse community needs.

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- **Prohibition of Advertising-Enabled Chargers** (Safety, Risk and Compliance) highlighting the risks of exclusion, and proposing a more balanced approach.
- Charging Site Approval Process (Application and Approval Process) welcoming Council's streamlined approval pathway.

Please find below more detail relating to these key points:

#### **Concentration of Public Charging Infrastructure**

The Policy currently requires proposed charging sites to be considered from the perspective of reducing the concentration of EV chargers in a given area. While we recognise the importance of protecting parking supply, Council should also consider:

- **Different charging use cases**: A slow pole-mounted AC charger serves overnight residential demand, whereas a DC fast charger serves short-stay commercial areas. Both can co-exist in close proximity without overlap of use cases.
- Equity of access: Free charging models (such as JOLT's) serve different demographics than paid
  models, making the network more inclusive. Ensuring EV charging is affordable and equitable is
  important to maintaining a competitive market where pricing of charging is aligned as closely as
  possible to the cost of energy, while acknowledging the commercial realities of public charging
  infrastructure.
- **Network effect**: More chargers often generate higher, not lower, utilisation. For example, after JOLT installed a charger at Mona Vale that quickly became saturated, a second unit 50 metres away doubled total sessions, rather than splitting demand.

Council should view charging as an ecosystem where multiple CPOs, charger types, and pricing models work together to maximise accessibility, affordability, and resilience.

#### **Prohibition of Advertising-Enabled EVCI**

The Policy currently states: Council does not support EVCI with integrated advertising (Safety, Risk and Compliance)

We understand Council's desire to protect visual amenity. However, a blanket ban risks undermining the very goals of the Policy by excluding a model that:

- **Delivers free charging**: Advertising revenue directly funds JOLT's free 7kWh daily charging provision, supporting equity and affordability. This is the social license to operate the advertising.
- **De-risk**: Revenues derived solely from energy margin sales opens this capital intensive and high ongoing cost industry to several risks affecting long-term viability. Having a secondary revenue stream ensures long-term viability of the model and allows advertising-enabled CPOs to deliver on zero cost to Council agreements over decades. Given there is an additional revenue stream derived from this infrastructure, JOLT is able to deliver greater guaranteed Licence Fees on a long-term basis
- Ensures reliability: Advertising revenue is reinvested into charger uptime (>98%) and maintenance. A dual-revenue model de-risks operations and guarantees long-term viability. Intrinsic market forces which attract advertisers to display their content on advertising screens also reinforces the high performance of advertising-enabled chargers.
- **Supports Council communication**: JOLT screens can be used for local event promotion, sustainability campaigns, or emergency messaging in collaboration with Council.

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- Future Proofing: JOLT can upgrade technology to be in line with market expectations. As the
  Industry continues to evolve, what is appropriate now, may not be suitable in 5-10 years time. The
  additional revenue stream enables JOLT to move with the market and deliver future-proofed
  solutions.
- Supported by planning frameworks: The NSW State Environmental Planning Policy (Transport and Infrastructure) 2023 Amendment provides clear pathways for advertising-enabled charging units.
   In collaboration with external town planning consultants and Council stakeholders, JOLT will identify and navigate the appropriate planning pathway for deploying advertising-enabled EV charging units.
- Public/Private Community Infrastructure: The model of privately funded public infrastructure has
  been in operation for decades and has proven to be a very effective way for Councils to provide
  additional amenity to its ratepayers without using public funds. When there is a clear value
  exchange and an understanding of the social license to operate the advertising (i.e. free charging
  for the community, access to fast, public charging), commercial advertising has been broadly
  supported by ratepayers as an appropriate means of funding infrastructure.

To address concerns about proliferation, Council could trial a capped number of advertising-enabled chargers over the first two years (e.g. 10 units), and assess utilisation, amenity, and community benefit before expanding. This approach is consistent with how other councils have successfully introduced the model. JOLT will closely collaborate with Council to ensure the unique local character is maintained and enhanced to ensure maximum benefit can be derived from this infrastructure.

#### **Clear Demand for this Infrastructure**

Currently there are no JOLT chargers in the North Sydney LGA. In spite of this, there are 196 JOLT users who have an EV registered in North Sydney. This represents 13% of all North Sydney EV owners (1,658 as of 30 August 2025). These EV owners are driving outside of their LGA to obtain a service that could be made within their own LGA. This is a suboptimal outcome for all stakeholders - e.g. more congestion on roads, lost productivity and the erosion of the free charging element.

Around 25% of all sessions at our Beecroft charger come from North Sydney residents. JOLT would like to share insights such as these to work collaboratively to solve transport challenges faced by the LGA. It is neither sustainable nor equitable for residents to travel outside the LGA for charging that meets their needs.

#### **Charging Site Approval Process**

JOLT strongly supports the streamlined approval process proposed in the Policy. A transparent and efficient pathway will accelerate delivery of essential infrastructure while maintaining appropriate due diligence. We encourage other councils to follow North Sydney's example.

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#### Recommendation

JOLT respectfully recommends that Council remove the **prohibition on advertising-enabled EV charging infrastructure** from the Policy, and instead remains open to all types of business models, especially given the infancy of the industry, the high capital costs and ongoing maintenance requirements.

This balanced approach would:

- Support Council's climate and transport targets.
- Ensure equitable, affordable access to charging for all residents and visitors.
- Deliver infrastructure at no cost to Council, while generating a strong commercial return.
- Encourage innovation and investment in North Sydney's EV ecosystem.

We would welcome the opportunity to meet with Councillors to discuss this further and to share lessons from our partnerships with other councils across Australia.

JOLT commends North Sydney Council for its commitment to supporting EV adoption and stands ready to collaborate on delivering equitable, sustainable, and community-focused charging solutions.

# ELECTRIC VEHICLE CHARGING ON PUBLIC LAND POLICY

ADOPTION DATE:

**REVIEW DATE:** 

2028/29

**DOCUMENT TYPE:** 

**Corporate Policy** 

**VERSION:** 

1

**POLICY OWNER:** 

**Director of Planning and Environment** 

**POLICY REFERENCE:** 

CORP\_POL\_ECM



# 1. PURPOSE

The purpose of this Policy is to guide the establishment of publicly accessible electric vehicle charging infrastructure (EVCI) to encourage electric vehicle adoption in North Sydney, reduce emissions, meet climate targets, and improve local environmental outcomes.

The Policy aims to ensure consistency, equity, and transparency for all stakeholders, and to articulate Council's requirements for the installation of EVCI on public land.

# 2. SCOPE

The Policy applies to all publicly accessible EVCI installed, or proposed to be installed, on public land, including Council car parks and private infrastructure in the public domain, by Charge Point Operators (CPO) or other organisations.

# 3. DEFINITIONS

| Term   | Definition  |  |
|--|---|--|
| Charge Point Operator<br>(CPOs)                    | A company or other entity responsible for the installation, operation, and maintenance of EVCI.  CPOs ensure that EVCI are functional, accessible, and integrated into networks, enabling EV drivers to charge their vehicles safely and reliably.  |  |
| Electric Vehicle (EV)                              | An 'All-Electric' or plug-in hybrid vehicle that takes electricity from a socket and relies entirely or in part on the electricity stored in an on-board battery for propulsion.  |  |
| Electric Vehicle Charging<br>Infrastructure (EVCI) | The network of hardware and systems that supply energy to recharge electric vehicles (EVs), including charging stations, connectors, and supporting equipment.  It encompasses various types of chargers, such as slow, fast, and rapid chargers, which can be installed in public, private, or commercial locations to facilitate EV adoption and use. |  |
| Level 2 Charger                                    | EVCI that uses a 240-volt power supply. Known as AC charging.   |  |
| Level 3 Charger                                    | EVCI that uses direct current (DC) at high voltage to rapidly charge electric vehicles. Known as DC fast charging.  |  |
| Public Land  | Kerbside space owned by Council and Council-owned car parks.  |  |

# 4. PRINCIPLES

This Policy is supported by the broad principles outlined below.

*Equitable:* Ensure the equitable distribution of EVCI to provide fair access for all people, including lower resourced residents and those without private charging options and minimise reliance on public land for private vehicle use.

*Safe:* Protect the community by ensuring EVCI meets safety standards and providing users with clear, accurate, and timely information on charging costs, availability, and usage.

*Transparent:* Ensure transparency by clearly defining roles, responsibilities, and requirements for the installation, operation, and maintenance of EVCI.

*Sustainable:* Support the transition to low-emission transport and reduce community emissions in alignment with the North Sydney Environment Strategy.

Accessible: Ensure equitable and barrier-free access to EVCI for all community members, including people with disability, in line with accessibility standards.

*Public amenity:* preserve the visual and physical amenity of the public domain and minimise any adverse impacts on community spaces.

Infrastructure Expansion and Optimisation: Facilitate the growth and strategic placement of EVCI across the North Sydney LGA to meet increasing demand for electric vehicle charging. This includes using, where possible, existing infrastructure to install EV charging assets within the public domain to minimise footprint and visual impact.

#### 5. PROVISIONS

To guide the installation and operation of EVCI on public land, Council adopts the following provisions.

# **Site Selection and Design Criteria Requirements**

Site Selection

- Sites must be located on Public Land.
- EVCI is permissible under the relevant legislation at the proposed location. CPOs are responsible for securing development consent and/or relevant consents and approval, where applicable.
- EVCI must not be installed where existing or planned active or public transport networks are planned, unless Council confirms the location will not interfere with future work. Consideration must be given to North Sydney Council's proposed bike network and any other public works that may be planned.
- Environmental constraints and characteristics must be considered. Proposals will not impact on heritage items, as identified in North Sydney Council's LEP 2013.
- Consideration is to be given to the North Sydney CBD Public Domain Strategy and North Sydney Development Control Plan (2013).
- Where possible, existing infrastructure is to be used to install / deploy EVCI to minimise footprint and visual impact.
- Sites must consider the location of existing EVCI in the proposed area and action has been taken to reduce the concentration of EVCI.

- Sites should have suitable access to an existing electrical supply. Council will bear no
  cost or responsibility for the provision of, or upgrade to, electrical supply
  infrastructure to service proposed EVCI.
- The facility and its operation will not adversely impact upon the amenity of surrounding development or enjoyment of the public domain.
- Where possible, CPOs are to minimise the number of charging units by installing dual port chargers.
- Sites must be accessible both day and night across the week.
- Consideration has been given to Council's preferred place-based charging model:
  - Level 2 Chargers (7-22kW AC) for on-street kerbside/power poles (preference in high density areas).
  - Level 2 and 3 Chargers (25-400kW AC/DC) for destination locations such as shopping and village centres.
- All applications require final approval by Council. Council reserves the right to reject or approve any application at its absolute discretion in the circumstances of each individual case.

#### Sustainability

- EVCI must utilise 100% renewable energy or GreenPower.
- Materials used should be recyclable and meet minimum durability standards (IP55/IK10).

#### Safety, Risk and Compliance

- Sites must be well-lit and comply with AS/NZS 1158 standards. Integrated lighting on equipment is encouraged.
- Fire safety systems must be built-in and comply with national standards and EV fire safety guidelines.
- CPOs are responsible for checking and maintaining the EVCI. Applications must include a schedule for regular, preventative and reactive maintenance. CPO contact details are clearly visible on the EVCI to rectify any issues.
- CPOs are responsible for decommissioning and restoring land to its original condition. Applications must include a decommissioning plan including site restoration, disconnection, and component recycling.
- Parking areas must comply with relevant Australian Standards and be safe for all road users.
- CPO must have public liability insurance with coverage of minimum \$20 million.
   Liability of the EVCI is the responsibility of the provider and Council will not be held liable under any circumstances.
- Council does not support EVCI with integrated advertising.

#### Accessibility and Equity

Disability parking with EVCI will be compliant with the *Disability Discrimination Act* 1992. This will include disability accessible parking bay requirements in accordance with AS/NZS 2890.6 Cl. 2.2.2 or AS/NZS 2890.6 Cl. 2.2.1, Cl.3.2 b) 11) as applicable.

- EVCI will not disrupt or negatively impact upon existing ease of access on public land for all users, around the site.
- EVCI will be installed with clear, unobstructed access pathways that meet the requirements of the *Disability Standards for Accessible Public Transport 2002* and AS/NZS 2890.6: Parking Facilities for People with Disabilities
- EVCI will comply with AS 1428.2: Design for Access and Mobility to ensure reach ranges and usability.
- EVCI must meet a minimum 98% uptime and provide transparent reporting on availability.
- EVCI payment systems must:
  - Allow for contactless card transactions.
  - Be accessible without mobile/internet connectivity.
  - Include options that are accessible for people with disabilities.
- Pricing must be clearly displayed in cents per kWh without requiring an app or signal.
- Customer support must be accessible and inclusive.
- Locations should support equitable access across the community, with preference for all EVCI to be dual port and have a minimum input power output of 7kW AC and 25kW DC.

#### Council Partnership and Data Management

- CPOs must provide Council with anonymised usage and performance data upon request, or as agreed to in the licence agreement, including:
  - o Session frequency, duration, kWh served, and user patterns.
  - Maintenance and uptime records.
  - o Income data (kept confidential).
- All data collected must comply with the *Privacy and Personal Information Protection Act 1998* and Council's Privacy Policy.
- Infrastructure should support interoperability through standards such as OCPP2.0.1 and ISO15118 and be vehicle-agnostic.
- CPOs are required to comply with existing kerbside parking restrictions at the
  proposed location. Council may consider requests from CPOs to change parking
  restrictions on a case-by-case basis with consideration of the surrounding landuse
  and the purpose of the existing kerbside parking restrictions.
- CPOs are responsible for the installation and cost of installing signage and line
  marking relating to the provision of EVCI as well as the ongoing maintenance for the
  duration of the occupancy agreement.
- CPOs are encouraged to work with car share providers that are active in the LGA to support the car share fleet transition to electric vehicles.

# Licensing Requirements

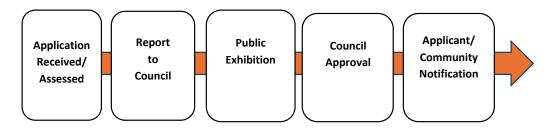
- All providers of EVCI on Public Land are required to enter into a licence agreement and are subject to the specific terms and conditions as agreed with Council.
- The acquittal process and terms of payment will be determined in the licence agreement.
- Fees and charges are payable for the installation of EVCI on Public Land and outlined in Council's Fees and Charges Policy.

• Council reserves the right to terminate a licence agreement and require the removal of EVCI and supporting infrastructure if a breach of the licence agreement occurs.

# **6. ROLES & RESPONSIBILITIES**

| Area  | Responsibilities  |
|---|---|
| North Sydney Council  | Council is responsible for ensuring that the installation and operation of EVCI align with its strategic goals, community needs, and regulatory obligations. This includes, but not limited to:   |
|   | <ul> <li>Planning and assessment</li> </ul>   |
|   | <ul> <li>Approvals and regulation</li> </ul>  |
|   | <ul> <li>Legal and financial administration</li> </ul>  |
|   | Community engagement  |
|   | <ul> <li>Monitoring and operational compliance</li> </ul>   |
|   | <ul> <li>Community education and awareness</li> </ul>   |
| Charge Point Operator (CPO) & other stakeholders seeking to install EVCI. | CPOs are responsible for the installation, operation, maintenance, and decommissioning of EVCI in accordance with State and Federal legislation and Council's requirements and agreements. This includes, but not limited to:  • Project planning and approvals |
|   | <ul> <li>Commercial and legal arrangements</li> </ul>   |
|   | <ul> <li>Maintenance and operational compliance</li> </ul>  |
|   | <ul> <li>Decommissioning and site restoration</li> </ul>  |

# 7. APPLICATION AND APPROVAL PROCESS



# 8. RELATED PROCEDURES, POLICIES, GUIDELINES OR PLANS

North Sydney Community Strategic Plan 2025-2035

North Sydney Environment Strategy

North Sydney Delivery Program 2025-2029

Northern Sydney Region of Councils (NSROC): Facilitating EV Charing Infrastructure Council Policies and Controls

North Sydney Development Control Plan (2013)

North Sydney Local Environmental Plan (2013)

Integrated Transport Strategy (2025)

North Sydney Bike Action Plan

Privacy Management Plan

Car Share Policy

Encroachment Management Policy

North Sydney CBD Public Domain Strategy

North Sydney Electric Vehicle Charging on Public Land Application Form

Electric Vehicle Charging on Public Land Nintex Process Maps

# 9. RELATED LEGISLATION, STANDARDS, MODELS OR CODES

Local Government Act 1993
State Environmental Planning Policy (Transport and Infrastructure) 2021
Privacy and Personal Information Protection Act 1998 (PPIP Act)
Disability Discrimination Act 1992
The Roads Act 1993
Road Rules Act 2014
AS/NZS 1158 standards

| Version | Date Approved | Approved by | Resolution No. | Review Date |
|---------|---------------|-------------|----------------|-------------|
| 7       | July 2025     | Council     |                | 2028/29     |