

Pathways Call for Evidence Submission

18 July – 14 August 2026

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This document is a submission to the Net Zero Commission's 2026 Pathways Call for Evidence. As part of the consultation process, the commission has committed to publishing the submissions it receives. Submissions do not represent the views of the commission.

Background:

The NSW state government has legislated formal greenhouse emissions reduction targets through the *Climate Change (Net Zero Future) Act 2023*. The targets aim to achieve a 70% reduction in carbon emissions by 2035 and net zero emissions by 2050. Similarly, many local Councils have set targets for their communities, with Waverley Council currently working towards achieving a net zero target for its community by 2035 through the Waverley Environmental Action Plan¹.

Ideally in Australia residential housing stock would be built to reach a minimum lifespan of 70 – 100 years, in order to minimise embodied carbon emissions. Currently in 2026, houses and apartment buildings built in NSW have the option to install gas appliances such as hot water heating, cooking and space heating. By installing gas in new buildings, *this will make it impossible for all levels of Government to reach their respective net zero targets by 2035 and 2050*.

A number of challenges exist to electrify these gas appliances in the future. In Waverley Council's experience, particularly for residential apartment buildings, once a centralised gas hot water system is embedded, it is difficult to electrify due to space constraints, billing challenges and cost. Through the Building Futures program, Waverley Council has worked with 63 mid-high rise buildings over the last eight years, and identified 68% (n=43 buildings) with centralised gas hot water systems. None of these buildings have electrified their hot water system over this time period.

Ensuring all new developments are built electric

Waverley Council was one of the first Councils to adopt an Indoor Air Quality provision into their Development Control Plan (WDGP 2022 – B2 ESD: 2.3) which prohibited the use of indoor gas appliances. Specifically:

(c) Gas cooktops, gas ovens or gas internal space heating systems are not permitted in any residential development. Instead, electric systems should be installed and clearly marked on DA plans².

There are now a total of ten Councils with similar indoor air quality / electrification provisions plus a further six Councils investigating this³. The City of Sydney's Indoor Electrification Provisions began 1 January 2026. From 1 January 2027, these restrictions will expand to cover outdoor gas appliances such as water heaters in new residential buildings. The all-electric requirement will also be extended to new medium to large commercial buildings, hotels and serviced apartment buildings⁴.

¹ https://www.waverley.nsw.gov.au/media/documents/council/plans/environmental_action_plan.pdf

² https://www.waverley.nsw.gov.au/planning/development_applications/development_control_plan_2022

³ <https://350.org.au/electrify-your-council-council-tracker/>

⁴ <https://news.cityofsydney.nsw.gov.au/articles/all-electric-buildings-in-citys-future>

Review of implementation

In 2026, Waverley Council conducted a review of residential Development Applications submitted during 2024/25. This audit identified a total of 34 new single dwellings. Their BASIX Certificates were manually checked for compliance of cooktop and space heating type against the Waverley DCP 2022.

The audit of BASIX commitments for the 34 new single dwellings found:

- 24% chose induction cooktop/electric oven,
- 50% chose gas cooktop/electric oven and
- 26% had no cooktop listed.

The audit confirmed that some BASIX Certificates were not publishing whether an electric cooktop/oven was selected for single dwellings.

Identified barriers:

There are a number of barriers and potential solutions that have been identified for local Councils implementing electrification measures at a local level. A summary is listed in Table 1.

Table 1: Challenges to implementing Indoor Air Quality/electrification DCPs in Councils

Challenge	Identified solution
Resource intensive – Council’s DA planners need to check multiple line items in the BASIX Certificate to ensure that cooktops, hot water heaters, space heating, pool & spa heating are all electric. This requires regular education of planning staff and extra time to assess each DA.	A state-wide all electric residential policy would ensure that electric appliances were delivered more efficiently at design stage through BASIX across NSW. DA planners would then focus their checks for overall BASIX Compliance via sighting the BASIX certificate and marked plans.
Time delays – if the Council identifies through the BASIX Certificate that a Development Applicant has selected a gas appliance, they ask the applicant to amend the BASIX Certificate with the relevant electric appliance and resubmit the BASIX Certificate. This results in time delays and can add costs if BASIX submitted by a third-party. Due to strict assessment targets, Councils are frequently (note: no quantitative data on this) implementing their Indoor Air Quality/electrification provisions via Conditions of Consent. See point below.	A state-wide all electric residential policy would ensure that the applicant can only select electric appliances in the BASIX tool at design stage when generating a BASIX Certificate. This would remove opportunity for gas selection that contravenes local DCPs and would avoid any time or cost delays associated with resubmitting BASIX Certificate.
Uncertain outcomes –The requirement for the BASIX Certificate to be amended post-approval sits with Principal Certifier at Construction Certificate stage and it is unclear whether this is happening.	As above.

Action taken to date

For further information on Council's contact with the NSW Government on this issue, please contact [REDACTED]