

Thank you for providing the opportunity for feedback on this proposal.

I have reviewed the document from which I have two items to raise for consideration. I have kept these to very brief points, however, this is not due to lack of consideration or concern but to make for ease of reference and be direct. Should it be appreciated to have a more in-depth display of the importance of these items, I would be happy to provide a fully referenced argument for their validity.

1. It is concerning that resources and time are contemplated to be spent creating a reform and new guidelines for providing gas to a new development. It is well established that the provision of gas is not a sustainable and long-term resource that can be viable to continue to utilise. As Australia has made commitments to reducing emissions and moving towards a net zero target, providing gas for energy is not physically possible if these commitments are to be realised. On this basis, the reasonable and future-focused plan would be to *reform the developers' policy not to have any gas facilities installed in any development at all.*

Time and resources should be dedicated to undertaking this reform once and not be required to alter it or have it become obsolete in the foreseeable future. It is not a new or unfounded commitment to phase gas out of the energy market and aims to make the entire infrastructure redundant within the emission target plan. Whilst it will continue to be required for existing property until a plan is implemented, there is no logical requirement for gas to be installed in any new property or development from 2023. It is not required with today's technology and provides no substantial benefit that makes it reasonable to consider as an option.

2. The policy appears to be encompassing a variety of development projects. It describes the subdivided and amalgamated property but doesn't mention **Strata Titled**. Strata-titled property can include residential, commercial or community developments, which require distribution systems to be implemented in the development planning and often are above four lots. If there is a separate policy and procedure for this type of property development, it would be prudent to have this specifically mentioned to clarify what property is within this policy and where the alternatives are covered.

Should this policy cover strata titled property development, then it should have this referenced clearly and intentionally. There should be considerations beyond the development stage of the property, particularly the management of the utilities in common property and as part of an embedded network or separately metered. While it might seem insignificant to the developers involved in the design of the project, with no disrespect, they are not the ones having to manage the infrastructure for the life of the building and, hence, should not be the only ones with a say in the policy and reform for the future buildings that will become someone else's responsibility to inherit.

Thank you for your time. Please let me know if there is further discussion desired on these items.

Kind Regards,

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Emerson Raine

I respect Whadjuk Noongar as the traditional custodians of the lands where we work and reside; I acknowledge that Boodja connects to all cultures living here.