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20 November 2019

Climate Change Consultation  
Department of Water and Environmental Regulation  
Locked Bag 10  
**JOONDALUP DC WA 6919**

Dear Sir/Madam

**Climate Change in Western Australia - Issues Paper**

This letter is in response to the Government of Western Australia seeking public comment on the above document.

The City has considered the Issues Paper, and comments are included in the attached table.

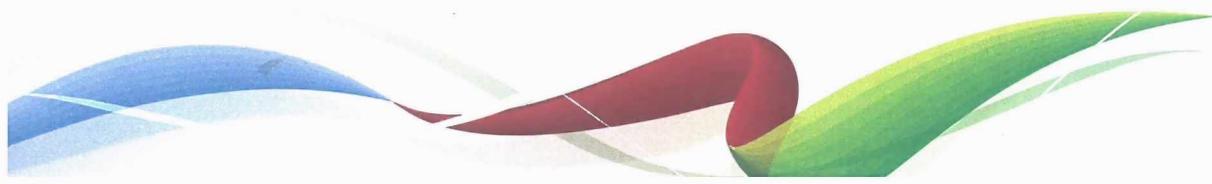
If you have any further questions in relation to the above, please contact the City's Manager Environmental Services, [REDACTED]

Yours sincerely

[REDACTED]

**Theo Naude**  
Executive Director Technical Services ( Acting)

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Draft WALGA Submission – Relevant Section	Area	City of Armadale Comment
4.1 Transforming energy generation	LED lighting	<ol style="list-style-type: none"> <li>1. Western Power must confirm their position on smart lighting in streetlight replacements, and commitment to; 1) Utilising 7 PIN NEMA smart technology; and: 2) Passing on associated benefits to Local Government (e.g. cost savings from dimming regimes).</li> <li>2. Where Local Governments co-invest in street lighting retrofits, approved third parties should be allowed to implement bulk replacement programs. This will ensure competitive pricing and efficient delivery. Alternatively, project delivery could be channelled through a specialist Western Power unit that expedites the process (similar to the SUPP program).</li> <li>3. Local government must not be charged the residual value of replaced luminaires in co-funded bulk replacements.</li> <li>4. Western Power must commit to disposing of retired streetlights in an environmentally responsible manner.</li> <li>5. The constituent components (e.g. power, maintenance) of LED streetlight tariffs must be made available, enabling the accurate assessment of bulk replacement business cases.</li> </ol>
4.1 Transforming energy generation	Enabling renewable energy projects	<ol style="list-style-type: none"> <li>1. Local Governments should be allowed to operate virtual parallel micro-grids. These allow excess generated renewable energy to be utilised at alternative sites (operating under a different NMI). This could promote investment in renewables by Local Government. <i>The City acknowledges that this will be achievable, to an extent, in 2022.</i></li> </ol>
4.2 Industry innovation	Commitment to innovation and emissions reduction	<p>The City of Armadale is committed to climate change mitigation, and:</p> <ol style="list-style-type: none"> <li>a. Is an active Cities Power Partnership signatory</li> <li>b. Participates in the Commonwealth Government’s Climate Solutions Fund (previously known as the Emissions Reduction Fund)</li> <li>c. Is scheduled to meet commitments in the City of Armadale Corporate Greenhouse Action Plan.</li> <li>d. Has divested from institutions with portfolios that include fossil fuel extraction.</li> <li>e. Is a founding member of the South East Regional Group. This oversees the award winning Switch your thinking Program (currently implemented over seventeen Local Government areas).</li> </ol>
4.3 Future mobility	Electric vehicles	<ol style="list-style-type: none"> <li>1. To facilitate uptake and efficient operation, State Government should introduce automated payment systems and design standards for charging infrastructure.</li> <li>2. Grid implications associated with large scale EV uptake should be considered, ensuring efficient vehicle charging. Pricing mechanisms could be developed to incentivise vehicle charging at optimum periods.</li> </ol>

4.5 Waste reduction	Recycling	1. The specifications used by the State Government in road construction and repair should be reviewed and consider the use of recycled materials.
4.6 Safe and healthy communities	Climate Health	<ol style="list-style-type: none"> <li>1. The City of Armadale previously made a submission to the WA Government's Climate Health Inquiry. The actions identified by the inquiry should be implemented as soon as possible.</li> <li>2. Heatwaves currently kill more Australians than any other natural disaster. The magnitude of this issue is likely to become more pronounced in forecast temperature rises. Switch your thinking's federally funded Cool Roofs Project concluded that light coloured roofs can significantly reduce in-door temperatures in houses with 4.5R ceiling insulation. The State Government should consider appropriate legislative mechanisms for enforcing lighter roofing palettes on new housing.</li> <li>3. The presence of tree canopies can suppress the urban heat island effect. The State Government should consider additional legislative mechanisms for the preservation of trees on private property. This could extend to tree protection under activities covered by the Planning and Development Act 2005.</li> </ol>
4.8 Liveable towns and cities	Energy Efficiency	1. See comment above in relation to the results of the Cool Roofs project. This could be effective in climate zone 6.