



20 January 2017

Clear Air for New South Wales

Online submission at: <http://www.epa.nsw.gov.au/air/clean-air-nsw.htm>

Dear Sir or Madam,

**Re: Clean Air for New South Wales**

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The Southern Sydney Regional Organisation of Councils (SSROC) is an association of local Councils in the area south of Sydney harbour. SSROC provides a forum for the exchange of ideas between our member Councils, and an interface between governments, other Councils and key bodies on issues of common interest. We facilitate collaboration between councils on joint ventures, procurement, and projects including advocacy. Together, our member Councils cover a population of over 1.6 million, or one third of the population of Sydney, and an area of 680 square kilometres.

SSROC acknowledges the case for reform that was made in the report of the Clean Air for NSW consultation paper published by the NSW Environmental Protection Agency in October 2016 and answers the questions set out in the consultation paper below.

**Are the actions proposed in this Clean Air for NSW Consultation Paper the right actions to improve air quality?**

- SSROC offers in principle support for the actions proposed in the consultation paper. SSROC has been working in collaboration with Inner West Council on a LGA wide Air and Noise Pollution Policy. Once that policy is formally adopted by council SSROC will look to facilitating a regional policy. Should actions additional to the consultation paper form part of the eventual policy we would look to make further submissions in line with an SSROC regional policy.
- SSROC strongly supports off-setting the fuel consumption by public transport with renewable energy, and welcomes the commitment by the government to for Sydney Metro North West to use renewable energy sources for operational needs. In addition to reducing Sydney's greenhouse gas emissions, this commitment will drive new investment in renewables and generated jobs in regional areas.
- SSROC also strongly supports increasing walking and cycling and improving the infrastructure that permits residents to easily and safely pursue these alternatives to driving. Furthermore, this would have co-benefits in improved public health and reduced traffic congestion.
- In reviewing the EPA's load-based licensing scheme, SSROC would urge the government to include greenhouse gas emissions within the scope of the scheme, particularly in the absence of a carbon pricing mechanism.

### **Are there other issues and actions that Clean Air for NSW should cover?**

- SSROC supports the facilitation and promotion of street tree planting and urban canopy is a priority action that can be taken for clean air for NSW. Street trees have an essential role in moderating the levels of air pollution by cleaning and purifying air, they also have wide range of other benefits including cooling, diverting and cleaning stormwater, preventing erosion and other functions critical to a liveable city. The EPA could further its mitigation of air pollution by developing best practice guides to the growth of urban canopy and facilitating the planting of street trees particularly in urban renewal corridors. A similar approach should be taken to the promotion of green roofs and walls on new developments that can similarly purify air in the surrounding areas.
- SSROC urges the government to facilitate infrastructure development and incentives for increased electric vehicle use. This would have very positive impacts on air pollution by removing polluting petrol and diesel vehicles and replacing them with emission-free electric vehicles. NSW could become a leader for the electric vehicle market in Australia. The recent launch of the Tesla 3 and the planned introduction of new electric vehicles signal a fundamental shift in the global automobile industry. The lack of genuine incentives and infrastructure to support the growth of electric vehicles in Australia limits the technology to a small minority of earlier adopters, while other major cities and countries are increasingly catering to the market for electric vehicles. Incentives such as registration fee discounts, stamp duty exemptions, and use of transit lanes are some possible methods for encouraging up take of such vehicles. Furthermore the installation of charging stations in convenient locations such as commuter and supermarket car parks with a focus on energy from renewable sources is essential to this innovative industry's growth. Incentives could be offered to companies and local councils seeking to install or establish charging stations
- SSROC recommends that the trialling of car-free days in particular precincts, with appropriate public transport incentives should be considered: these measures have proved to be highly beneficial in various cities around the world.
- The state government should also consider measures to limit private car use on days with high air pollution such as when there are active bushfires or back-burning operations. This could be facilitated through subsidised or free public transport on such days, which are generally known at least several days in advance, and by working with local councils to moderate the cost of metered street parking on high pollution days.
- The consultation paper provides a summary of the NSW Air Quality Monitoring Network, but offers no comment on the adequacy of the networks or the pollutants that it monitors. SSROC would ask that the extent of the network be reviewed to ensure that it provides adequate data for the assessment of the health (and any other) impacts on people and infrastructure near to known sources pollution. For example, the 15 sites in Sydney may provide data that indicates overall good air quality, but which does not identify pockets of potentially poor air quality, such as residential streets or parks near a coal-carrying freight line or the neighbourhood around a road tunnel stack.

### **How do you want to be informed about and involved in improving air quality?**

- SSROC would like to be kept informed regarding the outcomes of the consultation process and would hope to attend the Clean Air Summit as well as being afforded future opportunities for consultation. SSROC would also welcome opportunities to meet and discuss how state and local government can work together to achieve the aims of this reform.



Thank you for the opportunity to offer this feedback.

Due to the timing of this submission it has not been possible for it to be reviewed and endorsed by the SSROC Delegates. Should any issues arise as a result, I will contact you. For any enquiries regarding this submission, please contact me or Helen Sloan, Program Manager SSROC on 02 8396 3800

Yours sincerely,

A handwritten signature in black ink that reads "H Sloan".

p.p. Namoi Dougall  
General Manager  
Southern Sydney Regional Organisation of Councils