

[REDACTED]

The Actions proposed in Clean Air NSW are in principle supported as a means to minimise the potential impacts of air pollution in the State -
however -

1. It is considered that Clean Air for NSW focuses too strongly on addressing emissions from the pollution source. While this is important, it only addresses half the issue. Reducing vehicle emissions and encouraging greater active transport use is a means to reduce the source of pollution but at the same time more intensive land use development adjacent to major roads is resulting in more people (and sensitive receptors such as childcare centres, aged care homes etc.) encroaching closer to the source than before.

It is suggested that there needs to be a much stronger co-ordinated, integrated and holistic approach that brings together strategies and policies that address both the pollution source and land use planning under the one document. Perhaps there is an opportunity to bring together the NSW Dept. of Planning Interim Guidelines for Development near Rail Corridors and Busy Roads and Clean Air for NSW for example?

2. There is a strong focus on industrial development as a source of pollution but in view of climatic change, increasing major dust storm events, thunderstorm asthma affecting urban areas etc. should Clean Air NSW not re-evaluate and establish a position on the impact from Agricultural activity and practices that cumulatively contribute to higher levels of dusts and particulates in the atmosphere?

3. Council receives many development applications for uses such as childcare centres near major roads. The Approved Methods for the Modelling and Assessment of Air Pollutants in NSW however does not have a section on how to best model and interpret modelling of air pollution generated by road traffic (non stationary sources). This would be most helpful and ensure consistency.

Regards

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