City of Sydney Recommendations/Observations:

1. The consultation paper recognises that expansion of public transport is positive for air quality, and is “essential to future clean air in NSW” (on page 18). The converse of this is that spending on a massive road project in an inner area will be negative for air quality and seriously detrimental to future air quality in NSW. **We recommend cessation of work on new roads, particularly in inner areas and in densely populated areas.**

2. The consultation paper stresses the importance of limiting exposure of large populations to areas of poor air quality and the need to integrate air quality considerations in to transport and land use planning. Yet much of Sydney’s population growth will be accommodated in areas with higher air pollution in north-western and south-western Sydney and along busy main roads such as Parramatta Road. **We recommend planned growth be limited to areas meeting a higher minimum air quality standards.** This would mean specific action would need to be successful in those locations before settling large populations there.

3. The actions for reducing transport emissions need to be strengthened by including increasing walking, cycling and public transport as a prime method of reducing motor vehicle emissions. Around half of Sydney’s car trips are less than 5km long and eminently suitable for many or most of those to be replaced by bike journeys if only government provides a safe bicycle network. The NSW Government investment in building the long overdue bike network is a fraction of what is required. To capitalise on the bicycle’s ability to reduce car emissions, **we recommend at least 5% of the transport and road budget should be spent on cycling.** In fact, the *Global Outlook on Walking and Cycling* report published by the United Nations Environment Program in September 2016, calls on countries to invest at least 20 per cent of their transport budgets in walking and cycling infrastructure to save lives, reverse pollution and reduce carbon emissions.

4. Likewise, using bikes and cargo bikes for last mile deliveries makes city logistics far more efficient and enables significant savings in cost, time and emissions. **We recommend more work is be done to facilitate consolidation centres and transfers to pedal powered last mile solutions,** including a comprehensive CBD bicycle network in the city centre and other major centres such as Parramatta.

5. In addition to strengthening emissions standards for NSW Government fleet procurement, **we recommend that the NSW Government learns from and emulates the City of Sydney’s award winning fleet emissions reduction program.** The City would be happy to share information on our success.

6. The proposal for an Electric Vehicle strategy is supported. A significant barrier is the inability under NSW regulations for parking adjacent to charging points to be dedicated to electric vehicles only. This is a major constraint to the growth of electric vehicles, that should be addressed as an immediate priority.

7. The paper recognises the importance of local councils role in managing local air quality, however local councils have limited information regarding general air quality within its LGA. Local NOx tubes and other air monitoring stations were removed from the City’s LGA by the EPA many years ago and therefore the lack of general road side monitoring and results means that the City Council is not in a position to assist with public enquiries and information on local air quality. The City Council cannot also assist to promote or be more active without regular local results/evidence to support the requirement for targeted resources to carry out projects to promote and support individual responsibility or general reduction in public emissions.

8. Whilst the EPA provides some support to local councils by providing enforcement training, it would be beneficial to promote a closer working relationship with the City and EPA officers responsible for air quality regulation and public information. This will assist with consistency of enforcement and information sharing to ensure that the role of managing local air quality is complimentary and more proactive.

Regards

Denise Read
Environmental Health Specialist
Health & Building

cityofsydney.nsw.gov.au
This email and any files transmitted with it are intended solely for the use of the addressee(s) and may contain information that is confidential or subject to legal privilege. If you receive this email and you are not the addressee (or responsible for delivery of the email to the addressee), please note that any copying, distribution or use of this email is prohibited and as such, please disregard the contents of the email, delete the email and notify the sender immediately.