8 April 2016

Vehicle Emissions Working Group
The Department of Infrastructure and Regional Development
GPO Box 594
Canberra ACT 2601

Dear Sir/Madam,

Vehicle Emissions Discussion Paper: Public submission

Hobsons Bay City Council welcomes the opportunity to provide a submission in response to the Vehicle Emissions Discussion Paper and to inform the development of the draft Regulation Impact Statements on noxious emissions and fuel efficiency measures.

Council supports the reduction of greenhouse gas and noxious emissions through a range of measures that will provide the greatest opportunity for the Hobsons Bay community and Australia. Such action will help avoid potentially significant economic, social and environmental impacts as a result of climate change.

Thank you for the opportunity to comment and I trust that the attached document provides valuable input.

If you would like to discuss this submission further, please contact Kathleen McClusky, Manager Strategy and Advocacy on 9932 1004 or email kmclusky@hobsonsbay.vic.gov.au.

Yours sincerely,

[Signature]

Chris Eddy
Chief Executive Officer
Submission to the Vehicle Emissions Discussion Paper

Hobsons Bay City Council recognises the overwhelming scientific consensus that human activity is causing climate change. Hobsons Bay, as a coastal municipality, is particularly vulnerable to the adverse effects of climate change. As such, Council has committed to reduce its own corporate emissions to zero by 2020 and assist the community towards achieving zero net greenhouse gas emissions by 2030. In addition, Council has developed a climate change adaptation plan. This plan responds to the risks of climate change to Council assets and services and includes actions that will assist the community to be more resilient to the effects of climate change.

The Hobsons Bay community has informed Council that what they value most about Hobsons Bay is the coastal location and was closely followed by the parks and green spaces and the sense of community. They would like Council to continue to protect these community and environmentally significant areas for future generations to enjoy. This includes ensuring the impacts of climate change are considered. Council sees this as the responsibility of all levels of government and would expect the Federal Government to strive for best practice standards and create policy and legislation accordingly.

Reducing greenhouse gas and noxious emissions through a range of measures will provide the greatest opportunity for the Hobsons Bay community and Australia to avoid potentially significant economic, social and environmental impacts as a result of climate change. Council’s Community Greenhouse Strategy 2013-2030 identifies several elements of transport emissions as crucial to assisting the community to reduce its greenhouse gas emissions by 2030 which include freight and residential travel. Key actions include advocating for major public transport improvements, development and implementation of an integrated transport plan and highlighting the importance of a low carbon vehicle future.

Electric vehicles and associated infrastructure

The Victorian Government's Electric Vehicle Trial 2010-14 interim report identified that on-street charging locations are rarely economic to install and operate due to uncertainties in the planning process, high installation costs, parking policy challenges, and low revenue potential. Information about electricity network configuration is not openly available and decision-making on electrical infrastructure proposals carries uncertainty in relation to time, requirements and outcomes. Most on-street sites require carefully planned and executed excavation works as part of the installation, making costs far higher than for off-street locations. Local government does not typically have the capital available to fund new infrastructure such as this, however it can play a role in educating and promoting new technologies and the benefits they may provide.

Low emissions vehicles operating on electric, hybrid, biofuel and natural gas sources will play an important role in reducing transport emissions in the longer term within Hobsons Bay. In addition, increased use of low emissions vehicles will improve air quality. Any low carbon vehicle future should encourage and enable the use of low carbon vehicles by providing information, reducing uncertainty, facilitating public charging points and priority parking for low carbon vehicles in particular by the private sector. Council can help facilitate the implementation of such actions to some extent but encourages the Federal Government to explore options to encourage low carbon vehicles.
This highlights the importance of incorporating requirements within planning legislation by State Government for new developments to include this infrastructure, so that installation and establishment costs are minimised. Hobsons Bay recommends that any regulation impact statement considers a full cost benefit analysis of the potential impacts, with relevant stakeholders being consulted throughout its development.

Should there be other methods by which low emissions vehicles could be encouraged, Council urges the Federal Government to explore and facilitate these to the best of its ability.

**Fleet purchasing policy**

Any future fleet purchasing policy should ensure that low emission vehicles, including electric vehicles, are purchased wherever possible. While the purchase of electric vehicles may present a higher upfront cost to the Federal Government, the multiple longer term benefits should justify this investment. These benefits are likely to include reduced costs over the life of a vehicle (a more fiscally responsible use of public money), reduced emissions and assisting in addressing some of the barriers to the uptake of such technologies, which should be a key role of the Federal Government.