



10 Blamey Street
Wagga Wagga NSW 2650
Phone 02 6925 1824
22 March 2010

The General Manager
Armidale Dumaresq Council
PO Box 75A
Armidale NSW 2350

Dear Sir, **POL134 – Policy For Sustainable Domestic Energy Use and Local Air Quality**

I congratulate Armidale Dumaresq Council on having a policy much more advanced than the woodsmoke reduction program of Wagga Wagga City Council. Nevertheless, I have some comments and suggestions.

There is only one way to bring about a drastic reduction of urban wood smoke, and that is to eliminate most of the wood heaters. With federal government funding, Launceston in Tasmania did this by subsidising the replacement of wood heaters by gas and electric heaters. The single most important effort you can make is to seek state and federal government financial support for a program to buy back wood heaters and enable owners to install gas and electric heaters. Meanwhile, you have to regulate wood heaters as best you can with inadequate powers of enforcement and at high and continuing financial cost.

The development applications that you require for the installation of wood heaters may provide significant protection of neighbours against wood smoke, depending on what grounds you allow for objections. Loss of air quality should be regarded as sufficient grounds to reject an application. If your lawyers deem this too sweeping, they may find a stricter reason legal, namely the presence of vulnerable young, old or sickly residents in a nearby house. AS4013 heaters do not emit negligible amounts of smoke, and there is no lower limit below which wood smoke causes no injury to health.

Another strong reason to object to a development application is a bad configuration of houses and chimney. A friend of mine had a double-storey house. Next door there was a single-storey house where the owner installed a wood heater having the chimney top opposite my friend's upstairs windows and a few metres away. The chimney complied with AS/NZS 2918:2001, but that did nothing to protect my friend against excessive smoke. She eventually sold her house and left Wagga Wagga after a prolonged and inconclusive dispute with the owner of the heater.

I note on page 7 that you intend to monitor PM2.5, an excellent intention for which you deserve a subsidy from the state or federal government. Your mobile monitor should also be used to investigate smoke complaints, because the NSW DECCW visual test described in the box on page 13 is useless in most circumstances. I know this from years of observing smoke plumes in Wagga Wagga. A wood-smoke plume that is conspicuous against a dark background is practically invisible against the sky or other light background. There is a house in Wagga Wagga whose chimney is so well hidden behind buildings that its strongly smelling plume cannot be seen from the street. It is impossible to see a plume at night, unless it is strongly illuminated, for instance at the floodlit tennis courts near my house.

The exemption of portable devices on page 9 is unwise. Mexican chimineas, very primitive wood-burning devices, are being sold in Australia. You should regulate them, perhaps under a different law. It may be legally possible to ban them.

I have observed large changes in smoke emission when new owners or tenants move into houses with wood heaters. This shows that it is theoretically possible to reduce smoke by educating and threatening users, but I believe it would be prohibitively expensive to reduce ambient PM2.5 by 10% per year by these methods (page 7). In just a single block of my neighbourhood it would take a major investigative effort to find out where the pervasive smell of smoke on winter nights is coming from. This takes my argument back to the second paragraph of this letter – it is necessary to reduce the number of wood heaters in Armidale by a large percentage to obtain a large and lasting reduction in ambient PM2.5.

Yours sincerely,

A handwritten signature in cursive script that reads "L. du Plessis".

Louis du Plessis