

21 July 2021

City of Greater Geelong
Wadawurrung Country
PO Box 104
GEELONG VIC 3220

Dear City of Greater Geelong

SUBMISSION: DRAFT PUBLIC STREET LIGHTING POLICY

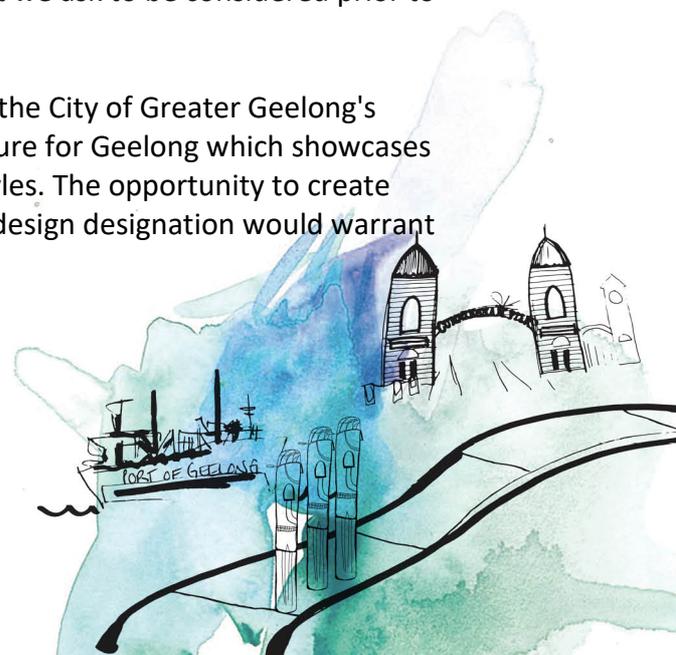
Please accept the following as the Committee for Geelong's submission to the draft Public Street Lighting consultation process. I submit this on behalf of the Committee for Geelong, both as representing views of the membership of the Committee for Geelong, with specific reference to commentary via member organisations and the UDIA Vic (UDIA Vic Submission attached)

ABOUT THE COMMITTEE FOR GEELONG

For 20 years, the Committee for Geelong has provided strategic leadership and influence to leverage the economic and social prosperity of the Geelong city-region. An independent, non-partisan, membership-based, not for profit organisation, the Committee for Geelong works collaboratively with an authoritative group of stakeholders and influencers to design Geelong's best future.

The following commentary along with the attached submission via the UDIA Vic (Geelong Chapter) includes a range of requests and feedback that we ask to be considered prior to the finalisation of the Policy.

The Clever & Creative community vision, together with the City of Greater Geelong's designation as a UNESCO City of Design, speaks to a future for Geelong which showcases Geelong as an exemplar in sustainable, attractive lifestyles. The opportunity to create communities that are desirable and worthy of a city of design designation would warrant





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those decisions regarding the built environment, including street lighting, be informed by the Clever & Creative vision, as well as design thinking. We believe this means there should be options available to developers to ensure their developments can deliver on this vision.

Please note the above statement, as well as the UDIA submission which includes the views of several of the Committee for Geelong's members, as our collective submission.

Many thanks,

Jennifer Cromarty
CEO Committee for Geelong





20 July 2021

Debbie Leeson-Rabie
Manager Engineering Services
City of Greater Geelong

By email: DLeeson-Rabie@geelongcity.vic.gov.au

Dear Debbie

Submission: City of Greater Geelong Street Lighting Policy Documents

UDIA Victoria is the peak body representing Victoria's urban development industry. We are a non-profit advocacy, research and educational organisation supported by a membership of land use and property development organisations, across the private sector and Victoria's public service. We are committed to working with both industry and Government to deliver housing, employment opportunities, infrastructure, and liveable communities. The residential development sector employs nearly 200,000 Victorians.

UDIA Victoria welcomes the opportunity to provide feedback to the City of Greater Geelong (COGG) at the policy formulation stage regarding street lighting.

Our members work across all growth area councils in Victoria, and we bring this lens to our submission. We have considered both policy documents, being the Draft Public Street Lighting Policy (Draft Policy) and the Draft Street Lighting Engineering Design Note.

Key Issues

In our view, previous versions of the City of Greater Geelong Lighting Guideline provided opportunities for multiple interpretations and required considerable input from CoGG officers for specific clarification at the implementation stage. The opportunity exists in this adaptation of a new set of guidelines for the CoGG to be more specific, which will in turn establish efficiencies in design and approvals associated with this process.

We see benefit in a common approach between councils with respect to technical standards and most aspects of policy – but we appreciate that councils have different views regarding variation from standard street lighting depending on the vision and objectives for the municipality.

In this context, the key issues we have identified are:

- The need for more flexibility for provision of non-standard street lights.
- The need for more technical information to form part of council's policy.

Flexibility

Our key concerns around flexibility include:

- Dislocation between this policy and council's Clever and Creative vision.
- Trigger for council to consider non-standard lighting.

- Forms of non-standard lighting that can be considered.
- Fees for considering non-standard lighting.

Further details about these is provided below.

Relationship between the Draft Policy and CoGG Clever and Creative vision

The CoGG has a strong, long-term Clever and Creative vision and is a UNESCO City of Design which encourages innovative and forward-thinking World-class design outcomes. The CoGG has been progressively establishing supporting policies such as its Smart City Framework. The CoGG is also pursuing demonstration projects like its Clever and Creative Corridor in the Northern and Western Growth Areas. In our view, the Street Lighting Policy needs to be revised to align to council's more innovative policy ecosystem.

The proposed policy needs to provide a more detailed process and framework for the provision for alternative forms of lighting, or Smart Poles to be adopted through a strategic plan or precinct structure plan (PSP) for discrete areas (i.e. the Central Geelong Framework or the new growth area PSPs or Development Plans). The Engineering Design Note goes part of the way, but clarity regarding the process and consultation that would be adopted. Any decision to adopt alternative standards for particular areas should be able to be referenced on the CoGG website so designers can quickly see the areas where alternatives are available or even required are in place.

Where there is strategic justification and a decision of the CoGG to adopt alternative approaches, then this policy should anticipate and facilitate that outcome. Such an approach would encourage a strategic and well considered approach and for developers to work with the CoGG in the strategic planning process - for example to create a specific response for a key boulevard delivered by multiple developers through a growth front.

Trigger for CoGG to consider non-standard lighting

The Draft Policy includes a trigger for developers to coordinate at least 1,000 lots in an Estate before the CoGG will consider decorative lights. Given the very small number of alternates for the non-standard lights, this requirement is unnecessary and should be removed. Instead, developers should be able to have a street light variation concept plan approved for their individual estate and decision guidelines for that should be provided.

If there were a much wider variety of variation permissible, then we agree that there may need to be different thresholds for different types of nonstandard lights to assist the CoGG to manage ongoing maintenance over time without a complex mosaic to street light types being in place.

Forms of non-standard lighting that can be considered

The current proposal supports what our members consider to be an extremely limited variation in street lighting fixtures. Our members observe that other growth councils allow for some additional flexibility, but still within a structured framework that protects the interests of the responsible council.

We appreciate the rationale for the CoGG to hold a firm reign on the ability for developers to propose alternatives. However, we consider that the policy goes too far and applies a straight jacket with very little room for developers to consider variation from the norm.

Our members report that the City of Melton has a well-considered and more detailed policy regarding

street lights which provides for some reasonable variation. The Melton policy also provides greater depth of technical information to assist in preparation of detailed design drawings and means that there is far less need for review and comment from council on street lighting compared to other councils that only publish high level guidance.

Fees for considering non-standard lighting

We note that the Non-Standard Lighting fee is now 100% of the additional costs. We recommend that the policy clearly state that this cost is the additional capital cost above and beyond the standard Gal Pole or V street Light – rather than 100 per cent of the entire cost of the street light.

However, given the limited variability in approach, we consider that the 100 per cent cost impost is unreasonable and we would like to understand Council's rationale further.

Additional Technical Feedback

The Draft Policy document is a high-level document. Our practitioner members who are involved in the detailed design and delivery of street lights are strongly of the view that more detail would be beneficial. We suggest that the CoGG consider covering the following in the policy:

- Where the CoGG wants lighting provided (i.e. urban areas, channelised intersections, pathway's in parks etc.)
- What standards the CoGG wants roads / parks/ gardens lit to.
- Where the CoGG wants standard fittings and where there might be exemptions.
- Detailed mapping of the steps and stages in the approvals process for external parties (i.e. outside Council).

Some of this material could be foreshadowed in the policy document and detailed in the Engineering Design Note.

The Engineering Design Note has some useful guidance for designers, however more detail would be beneficial, such as:

- Special controls for the LED fittings (e.g. 7 pin NEMA).
- Models of poles and fitting accepted for non-metered scheme. For example, Wyndham City Council just accepts standard Powercor poles, but Melton City Council accepts standard and non-standard, and they specify the non-standards ones.
- Location of lighting poles, such as the distance from back of kerb and driveways.
- Define specifically the lighting category per most common roads. The standard AS/NZS 1158.3.1:2020 is not clear. Further, there are situations with several options which are defined by a selection criterion such as fear of crime, need to enhance amenity, and so on, which are determined by the CoGG.
- The CoGG should be specific in situations where protective bollards would be needed, and provide specifications.
- It would be beneficial if the CoGG established a process for the design and management for any type of new public lighting scheme, such as: non-metered (Powercor) standard and non-standard, metered scheme (AS3000), VicRoads, among others. This process should indicate at which stage of



the project, the lighting design can be submitted, and the time frame for approval or comments. This would help to plan any construction activities.

- The CoGG should be specific about the documents required during the submission of new public lighting designs.

Contact

We invite you to attend our monthly Geelong Region Committee to discuss our submission and the work you are doing to finalise the policy. If you are agreeable, please contact the Committee Chair Greg Bursill on 0407 565 398 to arrange a discussion.

Please contact me directly at matthew@udiavic.com.au should you wish to discuss our submission further.

Yours sincerely

A handwritten signature in blue ink that reads 'Matthew Kandelaars'.

Matthew Kandelaars
Chief Executive Officer
Urban Development Institute of Australia