

Green Light Plan Draft Program Guideline Feedback Template

About this template

The Green Light Plan policy background paper and draft program guideline has been provided by the Victorian Government to inform stakeholders of the proposed design for delivery of the *Green Light Plan* program, as well as provide the opportunity to comment on the options for the design and implementation of the program.

Stakeholders are requested to collate a formal response using the feedback template attached. You may leave sections blank if you do not have specific feedback.

Timeframe and lodgement

Where possible, comments should be lodged electronically to the email address below. All written submissions will be treated as public documents unless individuals or organisations request otherwise. Please note that freedom of information access requirements will apply to all submissions including those treated as confidential.

The closing date for submissions:

5.00pm (AEST) 28 February 2012

Submissions may be sent via email:

greenlightplan@dpcd.vic.gov.au



Green Light Plan Draft Program Guideline Feedback cover sheet

Name of organisation:	City of Melbourne
Name of author:	Dr Kathy Alexander
Position of author:	CEO
Phone number:	9658 9830
Email:	Kathy.alexander@melbourne.vic.gov.au
Date submitted:	28 February 2012
Confidentiality:	All written submissions will be treated as public documents unless individuals or organisations request otherwise. Please note that freedom of information access requirements will apply to all submissions including those treated as confidential.
	Do you want this submission to be treated as confidential?
	Yes

⊠No



Please provide feedback as it relates to each section of the draft program guidelines. *Note <u>you may leave sections blank</u> if you do not have specific feedback.

1. About the Green Light Plan Program

Program objectives

The objectives of the program should be broadened to extend to demonstration and trial of non-standard lighting solutions.

Lighting types approved by electricity distributors do not include the best lighting solutions in terms of energy efficiency, amenity, and maintenance regimes. Some forms of LED lighting perform better in these respects but are not approved as standard lighting.

2. Who can apply

- Eligible organisations
- Joint applications

The proposed guideline is acceptable with respect to this section

3. What types of activities can be funded

- Maximum funding amount
- Eligible activities
- Ineligible activities

Eligibility criteria should be expanded to include lighting other than standard approved lighting, including trials and demonstration of innovative lighting solutions. Standard replacements for mercury vapour lights include only a narrow range of streetlights which do not represent the best solutions in terms of:

- energy efficiency,
- maintenance requirements,
- longevity,
- lumen,
- lighting quality (including amenity, visibility and therefore safety)
- ability to control (eg. light spillage into residences bedrooms),

Other forms of lighting which present better energy efficiency, luminosity and maintenance solutions have been accepted by distribution businesses for trials but have not been accepted as standard.

- 4. Funding details
 - Proposed timeline for funding rounds
 - Local government contributions

The proposed guideline is acceptable with respect to this section

5. Application process

The proposed guideline is acceptable with respect to this section

6. How applications will be assessed



The criteria which recognises the existence of a Sustainable Public Lighting Action Plan or Environmental Strategy does not encourage councils to undertake streetlight replacement where they would otherwise not have. It is suggested that this criteria be removed to incentivise all Councils to undertake streetlight replacement activities.

Obtaining written confirmation from electricity distributors of support for streetlight replacement within the application timeframe presents a barrier to submitting successful applications, particularly where a proposal identifies installation of innovative or non-standard lighting. The availability of funding can assist with progressing projects and gaining support from distribution businesses. It is suggested that the criteria be amended to demonstrate support from distribution businesses **OR** to demonstrate previous streetlight replacement activities and/or trials in cooperation with distribution businesses.

- 7. Assessment criteria
 - Supporting information required

For the reasons stated in 6) above, it is suggested that the following requirements be removed:

- written confirmation of support from local electricity distribution businesses,
- LGA strategies and/or sustainable lighting action plans.
- 8. Conditions that apply to applications and funding
 - Funding agreements
 - Privacy

The proposed guideline is acceptable with respect to this section

9. Resources and additional information

The proposed guideline is acceptable with respect to this section

10. Any other feedback

The opportunity for State Government assistance for sustainable public lighting is welcomed.