30th October 2007

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The Mayor and Councillors
Bayside City Council
PO Box 27
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Dear Mayor and Councillors,

Bayside City Council Lighting Strategy Survey

Beaumaris Conservation Society Inc. has noted the Council's Lighting Strategy survey published in the October 2007 issue of *Bayside City Council News*, and wishes to put its point of view on the general subject of lighting in parks and other areas of open space in Bayside, with special reference to areas in a predominantly natural condition, including most of the foreshore reserve. Its views refer to such areas in Bayside as a whole, because an inappropriate response to the threat posed by the thoughtless imposition of unwanted lighting adopted anywhere sets a precedent, and can initiate a conditioning of public attitudes that can all too readily spread.

The Aims and Objectives of BCS Inc. as set out in its Constitution require it, *inter alia*, to "encourage

- the conservation and restoration of the indigenous flora and fauna,
- the protection of natural landscape, foreshore, and seascape, and
- action to eliminate or prevent pollution."

Importance of Areas with Remaining Natural Ambience: BCS Inc. considers that it is one of the great assets of Bayside municipality that its foreshores and many of its public parks, particularly in the southern part of the municipality, have a predominantly natural ambience owing to the most fortunate retention of their widespread stands of indigenous bushland. BCS Inc. has operated for over 50 years to encourage the nurture and maintenance of those values.

A large part of the appeal of what survives of the character and ambience of those relatively natural areas has depended on their contrast with the artificial, mechanized, and ever-changing residential and commercial areas near them. That contrast provides a reflective, restorative and inspirational dimension to people's lives that is at risk of being extinguished in areas such as Bayside where urbanization is intensifying relentlessly.

Most people now have mobile phones to report trouble and summon help. It would also seem sensible to encourage people to carry their own lighting as cheap, bright torches are now readily available, with the beneficial effect that the desired lighting is only on when needed, and no public expenditure or installation of hardware into public places is needed.

Special Case of Bayside's Foreshore Reserves: The name of Bayside municipality purposely commemorates and highlights its most fortunate location on the margin of Melbourne's principal remaining natural feature, Port Phillip Bay.

One of Port Phillip Bay's significant advantages for Melbourne, and particularly for Bayside municipality, is its great lack of contribution to the growing problem of **urban light pollution**. That advantage still largely extends to, and includes, its public foreshore reserve. Any substantial increase in either the extent or the intensity of artificial lighting on the foreshore reserve will inherently be antagonistic to the existing values of that half of the time which all creatures - plants, animals and humans - have evolved to expect and cope with. The night vision receptors in our retinas, known as the '**rod cells**', can take some 30 minutes to adapt, so it is important for the full exercise and use of our faculties that people can find substantial spatial environments where they can take the time needed to move around and to enjoy that healthy and natural use of their bodies, rather than rarely, if it all, experience it.

It is recognized that artificial illumination is needed in residential, commercial and industrial areas, but much of the distinctiveness and appeal of our foreshore area is its relative naturalness and difference from those understandably more regimented areas. Lighting of foreshore paths will remove our opportunity, in our own neighbourhood, to enjoy the subtleties of twilight, and nights with moonlight in all its phases, starlight, and occasionally darker nights still, along with the birdlife behaviour then. There is already enough general light pollution to give sufficient stray and waste light for our night vision to never fail to operate through total lack of light.

Strong General Reservations on Lighting Survey Format: Some of the comment above relates to the inherent limitations in using a few multi-choice questions on general subjects without any quantification in the questions themselves such as actual sites proposed for lights, the number and spacing of such sites, the types of lights and their colour and intensity and their design in terms of glare, light pollution, unwanted stray light, height, control by timers or proximity sensors, power sources, mounting and power lines. BCS Inc. recognizes that the accompanying discussion mentions a number of those issues, but they are not part of the questions being answered.

BCS Inc. notes a distinct lack of balance and even-handedness where the top two-thirds of the half-page headed *'What do you think?'* - which consisted of statements by two effectively anonymous or even apocryphal persons - was devoted to a call for lighting in a single park at the northern edge of the municipality, surrounded by major roads and high-density residential areas. BCS Inc. nevertheless in good faith submits, in the attachment to this letter, a response to the survey questionnaire, except for the very questionably-worded Question 2, which it takes issue with below, and Question 4, the answer for which is Choice 5, which is given under the heading, "Special Case of Bayside's Foreshore Reserves" above. BCS Inc. asks that, in addition to that response to Questions 2 and 4, its answers to the multi-choice Questions 1 and 4 in the attachment to this letter be also included.

Particular Objections to Structure of Question 2: This question should not have been included, in the form it was, in a serious, responsible public survey. Its format presupposes that a constant unchanged ranking of **Issues 1-5** could sensibly be applied across each and every one of Bayside's numerous, and very disparate, parks and reserves. More realistically, the ranking would differ from park to park, and a blended response would be useless.

BCS Inc. considers, for **Issue 2**, there are undoubtedly serious potential negative effects on wildlife as animals and birds are very dependent on and responsive to the natural diurnal cycle of light and dark. Some of our members have remarked on the behaviour of even domestic fowls before, during and after the 10 minutes or so of a total solar eclipse during the daytime, where all the birds adopt their roosting pattern of movement and sounds before settling down in silence during the minutes of totality and then noisily and actively resuming their daylight behaviour as soon as the sunlight re-appears. **Issue 2** would have read better as, *"Potential effects on wildlife and **humans**".*

Asking respondents to rank such an ill-defined and sweeping **Issue 3** as "Human safety" among more obviously minor and more narrowly-defined concerns looks remarkably like an attempt to bias the outcome towards a predictable and convenient finding that an overwhelming percentage of respondents consider "Human safety" to be paramount. BCS Inc. argues that a far sounder approach to this question would be to give some indications of what aspects of "Human safety" were being envisaged. Without an indication of the scope of that issue, respondents would instinctively assume that serious threats to life and limb were implied, such as terrorism or violent crime.

How can a sensible answer be given on the ranking of costs, **Issue 4**, when no cost figures are supplied? As to **Issue 5**, it is rather telling that the survey's preamble states, *"Currently 62 per cent of Bayside's carbon emissions are from public lighting."*, and then proceeds to suggest that *"solar lighting or low carbon producing lamps"* might be used, but neglects to admit that both of those generate carbon emissions in their manufacture, installation and maintenance. Our question arises, "Why would Bayside City Council try to increase its carbon emissions by extra unwanted lighting?"

Rather than survey space being taken up by lengthy text by Celeste, whoever she is, including an O. Henry quotation and a claim that evidence of loutish and destructive behaviour appears in Elsternwick Park, with the only evidence cited being one needle picked up by one small child whose mother let him run ahead of her, it would have been far more useful to be told of the scale, incidence and range of threats experienced or envisaged, and in which parks they have occurred or are likely to occur. It would also seem reasonable to hear of what other preventative measures, such as extra policing and prosecution, are being implemented.

Recommendation: BCS Inc. considers that Bayside City Council should make no particular judgements based on the present flimsy and inadequate survey.

It should instead adopt a policy of keeping its parks, reserves and the foreshore and its paths free of artificial lighting, unless a specific proposal for a specified distinct place is made and adequately justified and public opinion widely canvassed on that specific proposal well beforehand.

Yours sincerely,

Adrian Cerbasi
President

Attachment: Response to Lighting Strategy Survey, Page 11 of Bayside City Council News, October 2007

Question 1.
Do you think Council should light parks in Bayside? (Indicate one answer)

Answer 4. Depends on the need.

Question 2.
If Council is considering lighting a park, which of the following issues do you think should be most important to influence Council's decision? Please rank the following, from '1' for the most important issue, to '5' for the least important issue.

This question is dealt with in the covering letter in the section headed,
Particular Objections to Structure of Question 2:

Question 3.
What is your attitude to lighting the paths on the foreshore? (Indicate one answer)

Answer 5.
This question is answered in the covering letter, particularly in the section headed,
"**Special Case of Bayside's Foreshore Reserves:**

Question 4.
Please tell us why you think the foreshore should be lit or not.

This question is answered in the covering letter, particularly in the section headed,
"**Special Case of Bayside's Foreshore Reserves:**