

Our ref: R24/0027

12 May 2026

Ms Kim Curtain
Deputy Secretary Energy, Climate Change and Sustainability
NSW Department of Climate Change, Energy, the Environment and Water

By email: energy.consumerpolicy@dpie.nsw.gov.au

Dear Ms Curtain

Review of the NSW Public Lighting Code

Local Government NSW (LGNSW) is the peak body representing NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community-based system of local government in NSW.

LGNSW welcomes the opportunity to contribute to the periodic Review of the NSW Public Lighting Code. LGNSW recognises the importance of the NSW Public Lighting Code in supporting the delivery of public lighting services to the community.

LGNSW has received feedback from with Southern Sydney Regional Organisation of Councils (SSROC), Central NSW Joint Organisation (Central NSW JO) and some other individual councils on this issue. SSROC has a footprint that covers 29 councils through the SSROC Street Lighting Improvement (SLI) Program. This includes councils in Sydney, the Central Coast and Hunter regions. Central NSW JO covers several councils in the Central West.

There is consistency in the feedback which is well-summarised in the SSROC submission. LGNSW supports SSROC's submission and strongly encourages the NSW Department of Climate Change, Energy, the Environment and Water (DCCEE) to address the issues raised in that submission.

The specific issues raised in the SSROC submission are as follows:

***1.Code Reporting** – While information provision from Ausgrid has markedly improved under the Code, Code reporting itself has not. [Distribution Network Service Providers (DNSPs)] are required to follow an IPART-developed template in an Excel-based workbook with nine separate worksheets. This workbook is complex and extremely challenging for councils to interpret. In practice, it is now ignored by most councils and only looked at by a few lighting specialists.*

To make service levels much more transparent, a simple and readily accessible one-page front end summarising DNSP performance in each LGA as compared to Code requirements is needed. SSROC would be happy to work with the Department and DNSPs in developing such an approach. To be clear, SSROC does not believe that this is about more reporting by DNSPs but about making it more accessible for councils.

*2. **Minor Capital Works vs Contestable Works** – Some aspects of minor capital works involving street lighting are covered in Section 10 of the Code. Where DNSPs deem works to be contestable, they are covered by separate contestable works guidelines. SSROC’s view is that too many small works fall under the exceedingly costly contestable works regime and that the delineation between the minor capital works and contestable works as it applies to public lighting is both unclear and interpreted differently by different DNSPs. In short, minor changes to public lighting should not fall under the contestable works approach. This is an issue of long-standing and requires reconsideration.*

*3. **Smart Controls Need to be Identified in DNSP Inventories** – Recognising the evolution of technology, Section 8(b)(ii) listing the major components to be included in an inventory should be amended to include smart controls as these are already billed for separately by Ausgrid.*

*4. **Penalty Reconsideration** – The Department should consider whether current penalties for non-compliance with Code requirements in Sections 11(d)-(f) of \$25 per fault as well as those in Sections 11(g) and 11(h) of 0.25% of annual maintenance charges provide sufficient incentive to maintain compliance with the Code. Consideration should also be given to the number of penalties paid annually as compared to the number of faults not meeting service standards. Reporting on penalty payments by LGA and overall by DNSP should also be required and be transparent.*

While potentially beyond the scope of this review, councils have also called for greater action to address light pollution in NSW. At the 2025 LGNSW Annual Conference, councils resolved as follows:

- R112/2025: Campbelltown City Council - Establish a light pollution policy for NSW**
That Local Government NSW:
1. calls on the NSW Government to:
 - a. investigate the social, environmental and economic impact of light pollution in NSW.
 - b. establish a state-wide light pollution policy, using the NSW Dark Sky Planning Guidelines as a framework to inform requirements on shielding for lighting fixtures, permitted spectrum of light and amount of light produced.
 2. encourages all local councils to investigate what steps they can take to reduce light pollution within their own LGAs.

Artificial light at night provides important benefits for safety, recreation and economic activity. However, there is increasing recognition that poorly managed or excessive lighting can result in a range of unintended consequences. Research has identified links between light pollution and negative impacts on human health, disruption of ecological systems, and loss of natural night sky visibility. Light pollution also contributes to unnecessary energy consumption, with associated financial and environmental costs. LGNSW would welcome DCCEEW considering the above resolution, and more broadly how light pollution can be best managed in NSW.



LGNSW thanks DCCEEW for this opportunity and commends the SSROC submission. If you have any queries in relation to this submission, please contact Shaun McBride, Chief Economist by email: shaun.mcbride@lgnsw.org.au.

Yours sincerely

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