

To: Mr Russell Kingdom  
Manager City Design  
City of Perth  
GPO Box C120  
Perth WA 6000.

30<sup>th</sup> June 2014

Dear Mr Kingdom

### **DRAFT LIGHTING STRATEGY**

The Property Council of Australia welcomes the opportunity to provide comment on the City of Perth's Draft Lighting Strategy.

As the leading advocate for Australia's property industry, the Property Council represents key owners, investors and developers of buildings in the Perth CBD. Due to this, the Draft Lighting Strategy is positioned to intersect considerably with the interests of the Property Council's members.

The vision and goals of the strategy are to be commended, and mark an exciting chapter in the development of Perth. The Property Council agrees with the City of Perth that strategic and high quality lighting design will increase the night economy of the city by encouraging longer stay times and visitation.

The Property Council strongly opposes any attempt to make the lighting strategy a prescriptive planning tool and is pleased to see that this is not part of the City of Perth's intention with this strategy.

The Property Council would not support any increase in the rates paid by our members should they result from the implementation of the lighting strategy.

The Property Council stresses the importance of ensuring there is a consistency of strategy between the City of Perth and the Metropolitan Redevelopment Authority in work through the city, to ensure a consistent vision is realised.

The Property Council recommends the use of incentives encourage good lighting practice amongst private developers, following the example of the City of Perth's heritage development incentives.

The Property Council notes that there are concerns regarding how the strategy and the associated lighting will affect NABERS and Green Star Ratings for buildings in the Perth CBD. We recommend that information regarding this be clearly elucidated, including any potential impact that could result and solutions for building owners and tenants.

While the key concerns around sustainability, namely energy efficiency and light pollution are acknowledged, further detailed strategies and targets should be included. The Property Council recommends the use of the approach applied by Green Star, particularly with respect to light pollution, as this is a robust methodology understood by the property industry.

The Property Council commends the identification of energy efficiency as one of the primary objectives of the strategy, which will deliver both savings in costs and a reduction in the City's greenhouse gas emissions.

There is significant potential within this strategy to catalyse further focus and awareness of energy efficiency opportunities of night-time internal lighting use. In encouraging the use of efficient external lighting to serve a specific function and purpose, the non-functional and inefficient afterhours internal lighting use should be discouraged. This could be achieved through recommended guidelines on control strategies and potential integration of the internal and external lighting systems.

The Property Council is supportive of the creation of a Lighting Taskforce for the City of Perth, due to the ability of such a taskforce to provide a strategic direction for the promotion of the lighting strategy and encouraging good lighting practice. We believe that such a taskforce would be enhanced by the presence of a representative from the Property Council, to provide a voice for the property sector and to be able to provide guidance for extending the reach of the taskforce to that sector.

We look forward to working with you in this area further. Should you require more information, please contact Graham Hansen, Communications & Policy Officer at [ghansen@propertyoz.com.au](mailto:ghansen@propertyoz.com.au).

Yours sincerely,



Joe Lenzo  
Executive Director

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