



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

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General Manager
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Attention: Frances Kelly, Planner

Ref X/103/2020

Seniors Living Multi unit dwellings

58 Albion Street and 62 Rupert Street Katoomba

Dear Ms Kelly,

The Society supports many of the sustainability aspects of this development: viz. each dwelling is small, simple, has insulated structural panels which have a high R rating, and double-glazed windows.

However we wish to object in order to suggest further ways to improve this application on the basis that it has still not adequately addressed appropriate site planning for environmental impact, and energy conservation/climate design.

Solar Access and Thermal Efficiency

This DA does not meet the standards as required in State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004, stated in Clause 35 (b)

“that the development should:

*involve site planning, dwelling design and landscaping that reduces energy use and makes the **best practicable use** of natural ventilation **solar heating and lighting** by locating the windows of living and dining areas in a northerly direction.”*

Whilst living area windows in this DA are oriented to the north, they do not “*make the best practicable use of solar heating and lighting* “. The units each have 2 north facing windows:

- One window has a wide awning/cover that will block out most of the warm north sun in winter;
- the other north facing window has no eave and will therefore allow in the hot summer sun.

The Seniors Living Policy (Urban Design Guidelines for Infill Development – March 2004) is more specific about the importance of orientation of dwellings and design to “maximise solar access” (p6). The fact that only ½ of the northern windows will work effectively for thermal efficiency at any one time does not meet this guideline.

There are now no units with an orientation to maximise passive solar design principles, whereas the previous application had 1 unit with this potential. This land is ideally situated to design units with the benefits of a passive solar design.

The Blue Mountains Conservation Society therefore **recommends** that the design of each dwelling be changed to achieve the 3 critical requirements for maximising solar access viz:

- Orientation - with long side of dwellings facing north ie going east-west.
- Northern windows - large
- Eaves over northern windows with widths to comply with CSIRO specifications for location, and not more extensive covers.

The Statement of Environmental Effects claims that each of the dwellings has “been oriented to ensure living areas face north and incorporate high thermal efficiency measures to improve comfort and reduce operational running costs” (p27).

Environmental Impact - Landscape Plan

The Seniors Living Policy with its aim “to achieve a high standard of urban design” recognises the importance of environmental factors. It states (p6):

“Site planning and design must respond to multiple challenges:reducing environmental impacts by minimising the consumption of energy and water. “

Lawns for groundcover is not the best option to “minimise the consumption of energy and water”. Low maintenance native groundcovers would be more appropriate for a development designed for elderly residents; eg *Hydocotyle peduncularis*. Even for this relatively small area of lawn, the cost and/or effort of mowing, watering and fertilising lawns is an unnecessary task and/or expense to be borne by future residents.

The lawn species recommended is Fescue which as a known invasive grass, and therefore introduces a further environmental impact. The local *Microlaena*, a lovely soft, lush lawn grass is a preferable alternative which would avoid further environmental impact of this weed.

The Society also objects to the proposal to plant *Clematis montana* which is a known weed. Many volunteer hours have been spent removing it from Bushcare sites in the upper mountains such as Popes Glen at Blackheath, bushland areas on the Everglades property in Leura, the Gordon Falls catchment in the National Park and KittyHawke

Swamp in North Wentworth Falls. The native *Clematis aristata* is a preferable alternative with its stunning creamy-white flowers, and evergreen. If a deciduous vine is required for a particular situation, grapes are one of many non-invasive exotic alternatives.

It is also disappointing that hybrids dominate the planting list, with very few indigenous natives local to the Katoomba area. These create issues of genetic pollution for nearby bushland.

The BMCS therefore **recommends:**

- That *Clematis montana* be removed from the planting list
- That more native plants indigenous to the local area be used to minimise water consumption
- That lawns be replaced by local native groundcovers to minimise water and fuel consumption

Remediation Action Plan

We note that the proposed remediation action plan involves extensive excavation to off site and we suggest that a stringent workflow and reporting regime be required as conditional to any approval of this DA.

If you have queries in regard to the issue raised in this letter please contact me.

Yours sincerely



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