



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

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Chief Executive Officer
Blue Mountains City Council
Locked bag 1005
KATOOMBA NSW 2780
council@bmcc.nsw.gov.au

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 welcomes the revised plans which have oriented the units to the north enabling improved solar access and thermal efficiency.

However, these plans still do not adequately meet our understanding of the standards for energy conservation and climate design.

1. Solar Access and Thermal Efficiency

As most of the length of the northern walls are of solid construction, there is only limited solar access; far short of the potential that this new northerly orientation has provided.

- The 2 bed units have glass over less than 5.1 m* of the total length of 11.88m (ie < 43%)
- The 1 bed units have glass over less than 2.7 m* of the total length of 8.12m (ie < 34%). If the W25 option is taken up this increases to 44.3%.

(includes a narrow 600 m window which would have limited solar access value)*

The Society contends that this DA fails to meet the standard required in the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004, as stated in Clause 35 (b) to

*“make(s) the **best practicable use** of natural ventilation **solar heating and lighting** by locating the windows of living and dining areas in a northerly direction.”*

We contend that it also does not comply with the guideline in The *Seniors Living Policy* (Urban Design Guidelines for Infill Development – March 2004). This policy is quite specific about the importance of orientation of dwellings and design to “maximise solar access” (p.6). The fact that less than ½ of the northern walls will provide any solar access does not meet this guideline in our opinion. Thermal efficiency and the comfort of residents is therefore highly unlikely to be achieved.

The policy identifies energy consumption in its Site Planning and Design Introduction on p.6:

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

Whilst the site layout now achieves the optimal orientation and eave width to maximise passive solar design principles, it has failed to provide adequate window/glass area along the northern wall to achieve the benefits. The units also have what appears to be excessive areas of windows on the southern walls which raises concerns for energy conservation. Without the internal layout, it is not possible to comment on the energy consumption issues; ie, their value for cross ventilation in summer compared with the heating loss in winter. (The southern windows cover almost 21% of the wall area in the 1 bedroom units and 24% in the 2 bedroom units.)

The Blue Mountains Conservation Society therefore **recommends** that the design of each dwelling be changed to increase the window/glass area on the northern walls.

An additional way to **minimise the consumption of energy** is the provision of clothes lines rather than locking residents into complete reliance on clothes driers. Whilst this level of detail may not be necessary at the DA stage, if a communal area is provided, it would need to be allowed for in the Landscape plan. We **recommend** that the provision of clothes lines be a condition of consent.

2. 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.”

Weed species

2 species proposed are listed in the 2015 DCP as weeds and should be removed from this plan:

Pistachia Chinensis
“Miscanthus sinensis and varieties”

Lawn

Lawn 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 *Hydrocotyle 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.

No mention of the lawn species to be used could be found. It is important that known invasive grasses are not used as these introduce further environmental impact. The local *Microlaena*, a lovely soft, lush lawn grass is a preferred species.

Absence of local native species

It is also disappointing that hybrids and non-indigenous species dominate the planting list. Only 3 species plus the “bio-retention” list have the potential to be sourced from local seed stock for the Katoomba area.

Hybrids can dilute the local genetic stock, weakening the vigour of local populations, particularly eucalypts, acacias and grevilleas. Whilst most hybrids may be sterile, many can set seed, and hence cross fertilise with local native species.

The other impact of hybrids can be that they revert back to one of the original species, and if this is not a local native, it could become weedy, eg *Lomandra hystrix*. Planting of genuine local native species can contribute to habitat for native fauna even on this urban land.

The BMCS therefore **recommends:**

- That the 2 species listed in the 2015 DCP as weeds and should be removed from this plan
- 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

3. 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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