



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

15 January 2021

Dr Rosemary Dillon
Chief Executive Officer
Blue Mountains City Council
Locked Bag 1005
Katoomba NSW 2780

By email to: council@bmcc.nsw.gov.au
cc. ksemenetz@bmcc.nsw.gov.au

Dear Dr Dillon,

Re: Seniors Housing Planning Controls (Draft Amendment to Blue Mountains DCP)

The Blue Mountains Conservation Society (the Society) is a community-based volunteer organization with over 850 members. Its mission is to help conserve the natural environment of the Greater Blue Mountains, and to increase awareness of the natural environment in general.

The Society is pleased to have the opportunity to comment on the proposed amendments to the Blue Mountains Development Control Plan in relation to seniors housing planning controls.

The Society has an interest in seeing the design of seniors housing developments improved to promote energy efficiency and sustainability, and reduce environmental impacts. In our submission to the Local Strategic Planning Statement (November 2019), the Society called on Council to take strong action to mitigate climate change impacts and reduce carbon emissions in all activities undertaken in the Blue Mountains LGA, not just Council's operations. These actions include introducing relevant development controls and standards, and design and materials requirements, applied to all new buildings and refurbishments, and initiatives to retrofit existing houses. We also called for stronger action to be taken to reduce vegetation loss.

Many of these actions are already covered in the current DCP, but the Society believes the DCP needs to be strengthened through its recommended amendments below. By adopting these, the Society believes the Council can make further progress towards its oft-stated goal of becoming the 'sustainability capital of Australia'

1. Solar Access and Thermal Efficiency

Many sustainability standards are already included in the DCP; however, these fall short of the best practice design for thermal and energy efficiency which is best achieved by **passive**

solar design. This is particularly the case when combined with this demographic that requires thermal comfort, low maintenance and reduced on going costs for residents.

Whilst the SEPP and *Seniors Living Policy* which previously covered the Blue Mountains was vague, it did allow council to require better performance through passive design principles. The Society therefore requests that the amendments include more specific requirements about:

- Maximizing the orientation of the buildings to the north
- Maximizing the window areas with a northerly orientation
- Requiring eaves over northern windows (of widths appropriate for the location of LGA).

The Society recommends retaining principles of thermal efficiency and solar access as outlined in 2 policies that previously applied to Seniors Housing in the Blue Mountains:

Northerly orientation

The *Seniors Living Policy* (Urban Design Guidelines for Infill Development – March 2004), is quite specific about the importance of orientation of dwellings and design to “maximise solar access” (p.6) The reason being for thermal efficiency and the comfort of residents.

The requirement in F1.2.7 C4 to limit southerly aspect units does not adequately cover this. There is a need to maximize units with a predominately northern orientation and to limit easterly and westerly units/dwellings too.

Northern Windows

State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 Clause 35 (b) recommends:

*“[making] the **best practicable use** of natural ventilation **solar heating and lighting** by locating the windows of living and dining areas in a northerly direction.”*

The standard in **the draft DCP** for sunlight access to living areas is grossly inadequate. The 1 sq m of windows required in F1.2.7 C1 (p.474) should be significantly increased.

Also, solar access should be included in the considerations for building separation distances in F1.2.1 C2 (a). Visual considerations are not the only important factor.

Eaves over windows

This essential requirement for passive solar design was not found in the DCP. The eave widths recommended by the CSIRO for this LGA should be included in this DCP for Seniors Housing.

Recommendation: that this DCP is more specific about the site layout and building design to implement passive solar design principles for energy efficiency as well as the comfort of residents.

2. Minimise the consumption of energy

The *Seniors Living Policy* identified energy consumption on p.6: “*Site planning and design must respond to multiple challenges:reducing environmental impacts by minimising the consumption of energy and water.*”

One small specific requirement to assist to minimize energy consumption is to require outdoor clothes drying space to avoid reliance on clothes driers.

In fact, this is what the Society proposed in our recent submission on the Seniors DA in Albion/Rupert St Katoomba. **Recommendation:** that outdoor clothes drying space is added to requirements under C3 (p470) of the draft DCP.

3. Water efficiency and Landscaping

The promotion of local native landscapes complies most closely with the objectives of LEP 2015 and also with the objective to minimize water consumption.

Whilst the need to establish vegetation quickly is appreciated, the requirements in F1.2.4 of the Draft DCP favour the planting of exotics. The requirement of advanced shrubs and trees (25 and 45 L containers) is not the optimal way to establish **local indigenous** plants.

Advice from a landscape expert in local natives is suggested as to the best way to achieve this balance.

Lawns should be avoided to “minimise the consumption of energy and water”. Low maintenance native groundcovers would be more appropriate for a development designed for elderly residents, for example with the use of *Hydocotyle peduncularis*. Even for a 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.

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.

Recommendation: that local indigenous plants be promoted as the preferred option in Landscaping Plans, and the requirements which favour mature exotic species be removed.

Representatives of the Society would like to meet with the Council officer to discuss and explain these recommendations in more detail.

Yours sincerely



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