



## SEPP 65 STATEMENT

New Residential Apartments  
51-57 Masons Parade POINT FREDRICK  
UPDATED: 21 September 2021

FOR  
Grindley  
55 Grandview Street (PO Box 6246)  
PYMBLE NSW 2073

21 September 2021

Gosford City Council  
49 Mann Street  
Gosford NSW 2250

To Whom it May Concern,

We confirm that Integrated Design Group has been engaged by Grindley to prepare the architectural documentation for the proposed development application at 51-57 & 59 Masons Parade, Point Fredrick.

Pursuant to the requirements of SEPP 65 - Design Quality of Residential Apartment Development, Part 4 Section 28 - Determination of development applications, we advise;

- a) The design has been directed by Simon Thorne of Integrated Design Group who is registered in accordance with the Architects Act 1929, registration number: 7093
- b) The design quality principles set out in Schedule 1 of State Environmental Planning Policy No 65 - Design Quality of Residential Apartment Development are achieved for the residential flat development.
- c) The proposal has been designed in accordance with the Apartment Design Guide.

Please contact me should you have any queries or require further information.

Yours faithfully,



**Simon Thorne**

DIRECTOR  
NSW ARB #7093



## INTRODUCTION

This report has been prepared in consideration of the proposed residential flat building at 51-57 Masons Parade, Point Frederick. The report will assess the design qualities of the proposed development and comment on the important components of the urban form having reference to the provisions of SEPP No. 65 and the Residential Flat Design Code, SEPP Seniors, Liveable Housing Design Guide and Gosford City Centre DCP 2018.

Brisbane Water Legacy (BWL) own and operate Legacy Village. The facility currently provides self-care accommodation consisting of 64 bed-sit apartments for legacy widows, 8 two-bedroom units which operate under the NSW Retirement Village Act, a hall and BWL administration office.

The proposed development replaces the existing accommodation onsite, which is old, too small and not appropriate for its ageing clients. The proposed 1 bedroom apartments will be rented to War Widows and Veterans. The additional 1, 2 and 3 bedroom units will be leased in accordance with the NSW State Retirement Villages Act, with the entire building remaining owned and operated by BWL. The proposal consists of a total 54 residential apartments across 6 storeys with on grade resident parking, a communal space and BWL administration office on ground floor.

The proposed development responds strongly to both the existing and intended urban context and contributes to the overall perception of a vibrant, lively and safe streetscape. Attention to form, massing and facade detail ensures that the building is a positive statement, in the eventual redevelopment of the area.

A thorough design process has been undertaken, including participating the Gosford Design Excellence process in the development of this building to ensure a high quality affordable and diverse housing model is delivered. The site is located close to public transport and has significant waterfront views to the west across Brisbane Waters. The bulk and massing of the building along the waterfront has been designed to avoid a continuous built edge in accordance with Councils LEP and DCP. This creates opportunities to share views to the water and landscape features from within the site.

Pedestrian activity and vibrancy are encouraged through the creation of a clear street address, direct access to the street and the integration of landscape and a mix of communal facilities at ground level. As an affordable housing project, the units are well exceptionally well positioned to offer people in need equitable access to quality housing in terms of both access and amenity.

This report and associated architectural plans provide an analysis of the site conditions and their relationship to the surrounding context. The site analysis has detailed all aspects and constraints on both the site and surrounding development.

## DESIGN QUALITY PRINCIPLES

The following statement provides an assessment against design quality principles set out in Schedule 1 State Environmental Planning Policy No 65 - Design Quality Principles of Residential Apartment Development, Apartment Design Guide.

### PRINCIPLE ONE: CONTEXT AND NEIGHBOURHOOD CHARACTER

Good design responds and contributes to its context (defined as the key natural and built features of an area).

OBJECTIVE	COMMENT
<b>NATURAL FEATURES</b> <i>The building should respond to the natural characteristics of the site</i>	<p>The site contains existing single and two storey residential units, Brisbane Water Legacy administrative office and communal facilities. The site is relatively flat with a fall towards the western boundary of approximately 0.7m over 100m.</p> <p>The property is positioned with a direct connection to the waterfront, with significant views to the west to Brisbane Waters.</p> <p>A flood information certificate has been provided by Council and Council have agreed to reducing the flood level based on engineering justification as part of the flood impact assessment. The site has a Probable Maximum Flood (PMF) level of 2.78m AHD.</p> <p>The building entry points are designed to work with the existing levels of the site, whilst also addressing the flood design levels. The lift in the ground floor plane, is connected to the street, through a breezeway creating places for social interaction but with the security of a 'front door'.</p>
<b>BUILT FEATURES</b> <i>How does the proposed development respond to the adjoining developments?</i>	<p>The proposed development has been identified in councils DCP to have an activated streetscape along Masons Pde. Communal facilities and BWL administrative offices are located on ground floor at the street frontage. Pedestrian activity and vibrancy are encouraged through the creation of a clear street address, direct access to the street and integration of landscape. The Pedestrian entry is clearly articulated through the massing and building form, that sets up a pedestrian link through the site, with the non-public access to the rear of the site.</p> <p>The subject site is located opposite the green space on the Brisbane Waters edge, a space which has the potential for increased public usage. It is located on Masons Pde which is accessed off the Central Coast Hwy. The site is adjacent to a new seven storey residential development currently under construction.</p> <p>Densifying this edge along Brisbane Waters encourages further use, without impacting the public's access to the natural assets of the City precinct. The site is ideal for new development that brings high quality residential development that revitalises and activates the Brisbane Water shoreline.</p>

## PRINCIPLE TWO: BUILT FORM AND SCALE

Good design provides an appropriate scale in terms of the bulk and height that suits the scale of the street and the surrounding buildings and an appropriate built form for a site and the building's purpose, in terms of building alignments, proportions, building type and the manipulation of building elements

OBJECTIVE	COMMENTS
<b>BUILDING ENVELOPES</b> <i>Building envelopes set appropriate scale of future development in terms of bulk and height in relation to street layout and lot size.</i>	<p>The existing urban footprint in the precinct is a mixture of low rise and medium density development, with predominantly retail and commercial along Mann Street and residential development on the city edges towards Point Frederick.</p> <p>The Central Coast Hwy wrapping the water's edge acts to separate pedestrian and visual connections to the water, from the predominant mix of existing 1 and 2 storey buildings along Masons Parade. Densifying development supports the DCPs approach of connecting the city to Gosford's natural settings.</p> <p>The proposal seeks to amend the height controls on the subject site, through the Gosford Design Excellence process to match the neighbouring properties and allow a consistent approach to development, providing a more harmonious streetscape to the water's edge.</p> <p>The current SEPP controls nominate a 15m height limit across the sites bordering the water towards Point Frederick. This creates an inconsistency to the streetscape character framing the water and the adjacent green space.</p> <p>Through careful design and breaks in the form to avoid a continuous built edge, the proposal is to increase the allowable height in the precinct to 26m.</p>
<b>BUILDING DEPTH</b> <i>Objectives ensure adequate amenity for occupants – sun and ventilation.</i> <i>Building depth 12-18m.</i> <i>60% of units to achieve cross ventilation,</i>	<p>The apartments have a variety of depths and use corner units or cross through units to assist with ventilation. A wide central courtyard means all units are cross through units and are less than 14m in depth.</p> <p>We confirm that 54 of the 54 units (100%) achieve cross ventilation.</p> <p>The building is orientated to address Masons Parade and significant views to Brisbane Water facing west, south/west. The northern and north/eastern elevations step down to bring natural light and ventilation into the courtyard. The courtyard is used as a secondary light source to the apartments. The courtyard is fully open to the sky, Light coloured external walls and lift shaft are used to assist in reflecting natural light into the courtyard.</p> <p>Landscaping has been developed to enhance the natural qualities of the courtyard.</p>
<b>BUILDING SEPARATION</b> <i>The objective is to achieve appropriate massing and spaces between buildings.</i>	<p>The proposed development incorporates the desired 0m street setback to provide a street wall bounding the public realm, in line with the existing mixed-use buildings along the street, with a 6m setback to the side site boundaries to the north and south. The south elevation has a further 9m setback to level 5 and 6. The balconies to those units go over the 9m setback, however fixed vertical louvres have been incorporated into the design for privacy.</p>
<b>BUILDING ENTRY</b> <i>To provide desirable residential amenity and to contribute positively to the streetscape and building façade.</i>	<p>The residents have been provided with clearly defined and secure entries, with a building lobby off the central courtyard. Entry to the building lobby is accessible compliant with AS1428.1 (2009).</p> <p>A wide and generous pedestrian link is provided from the main entrance through to the lift lobby and landscaped area at the rear of the site. The communal room and BWL office/admin on ground floor together with apartments above provide good passive surveillance to the main entry and the street.</p>
<b>OPEN SPACE</b> <i>An adequate area of communal open space is provided to enhance residential amenity and to provide opportunities for landscaping.</i>	<p>A good amount of communal open space is provided throughout the proposed development. A large landscape area is provided at the rear of the site receiving good direct sunlight, facing north.</p> <p>A central landscaped courtyard provides further amenity for residents allowing good natural ventilation and sunlight deep within the building.</p> <p>Several terraces with a variety of activities are provided on each level.</p>

#### PRINCIPLE THREE: DENSITY

Good design has a density appropriate for a site and its context, in terms of floor space yields or number of units or residents.

OBJECTIVE	COMMENTS
<b>FLOOR SPACE RATIO</b> To ensure development is within optimum capacity of site and local area, (modulation and depth of walls allow for habitable balconies).	<p>Gosford City SEPP FSR for the site is 2:1. The proposal has an FSR of 0.76:1 and is compliant with the FSR provision.</p> <p>The proposed development has a mix of 1, 2 and 3 bedroom apartments that comply with SEPP (Housing for Seniors or People with a Disability) 2004 and a communal room and BWL office/admin on the ground floor, which provides a mixed-use development reflecting the neighbouring area.</p> <p>The proposed building is aligned with neighbouring buildings at the street boundary. The proposed massing and building form have been designed to avoid a continuous built edge in accordance with Gosford City Centre SEPP 2018.</p> <p>The density is appropriate as the site fronts Brisbane Water, creating a more harmonious streetscape to the water's edge of the Gosford City Centre.</p>

#### PRINCIPLE FOUR: SUSTAINABILITY

Good design makes efficient use of natural resources, energy and water throughout its full life cycle, including construction phases.

OBJECTIVE	COMMENTS
<b>ENERGY EFFICIENCY</b> To reduce the need for mechanical heating and cooling, reduce greenhouse gas emissions and support and promote renewable energy initiatives.	<p>The design facilitates natural lighting within habitable rooms, particularly with most apartments having access to natural light from at least 2 orientations, being focused externally but with connection to the courtyard also.</p> <p>The proposal incorporates the use of design solutions to optimise heat storage in winter and heat transfer in summer.</p> <p>Roller blinds are incorporated into the street façade (west facing) for solar control</p> <p>The central courtyard has been designed to create a stack, allowing hot air to escape the building. Greenery through the open walkways and within shared spaces helps maintain temperatures in these areas.</p> <p>The building has been designed in accordance with SEPP no. 65 requirements for energy and water efficiency. The units in the proposed development comply with the requirements for cross ventilation with 100% of apartments achieving cross ventilation (exceeding the 60% requirement) which reduces energy use requirements.</p>

#### PRINCIPLE FIVE: LANDSCAPE

Good design recognises that together landscape and building operate as an integrated and sustainable system, resulting in greater aesthetic quality and amenity for both occupants and the adjoining public domain.

OBJECTIVE	COMMENTS
<b>LANDSCAPE DESIGN</b> To provide residents with a quality of life in the development in the forms of privacy, outlook and views. To provide for improved micro climate and solar performance.	<p>Early integration of the landscape design has been an important aspect of the design, with the central courtyard a focus of the development, defining spaces for social interaction of the residents. A further large landscape area is provided at the rear of the site receiving good direct sunlight, facing north and providing a range of activities.</p>



	<p>The central landscaped courtyard offers excellent amenity for residents allowing good natural ventilation and sunlight deep within the building and several terraces, with a variety of activities are provided on each residential level.</p> <p>Refer to landscape architect documentation.</p>
<p><b>DEEP SOIL ZONES</b></p> <p>To assist water table and improve amenity through planting large - medium size trees.</p>	<p>SEPP 65 requires 7% of the site area to be a deep soil zone, with a minimum dimension of 6m.</p> <p>SEPP 65 Deep soil requires min. 422.86m<sup>2</sup> (7%)</p> <p>The proposed design achieves 2020.98m<sup>2</sup> of deep soil (33.5%)</p>

## PRINCIPLE SIX: AMENITY

Good design provides amenity through the physical, spatial and environmental quality of a development.

OBJECTIVE	COMMENTS
<p><b>FLEXIBILITY</b></p> <p>To ensure that the design meets the broadest range of occupants' needs. To promote 'long life loose fit' buildings which can accommodate whole or partial changes of use.</p>	<p>The design of the residential apartments provides a variety of accommodation options and lifestyle preferences in the Gosford area.</p> <p>All residential apartments are compliant with the SEPP (Housing for Seniors or People with a Disability) 2004.</p> <p>100% of the units are compliant with the Silver Level Liveable Housing requirements.</p>
<p><b>ACOUSTIC PRIVACY</b></p> <p>Each apartment is to achieve acoustic privacy between external and internal space.</p>	<p>The design achieves separation of active and quiet areas in adjacent apartments where possible. ie: Living rooms to living rooms and bedroom to bedroom, where possible.</p> <p>Balconies are located away from one another, and visual screening is provided between balconies. Angled balconies on the north and south facades are orientated to the view of the Brisbane Waters, with fixed louvres added to create acoustic and visual privacy.</p> <p>Installing seals at the entry door in accordance with the BCA will reduce noise from common corridors.</p>

## PRINCIPLE SEVEN: SAFETY

Good design optimises safety and security, both internal to the development and for the public domain.

OBJECTIVE	COMMENTS
<p><b>SAFETY</b></p> <p>To ensure that Residential Flat Buildings (RFB) are safe and secure for residents and visitors, and the public domain.</p>	<p>The development reinforces the distinction between public and private with a clearly defined entry. The communal room and BWL office/admin are located at the front of the site, providing good passive surveillance to the street and the main entrance.</p> <p>The proposal includes well-lit access between car park and apartments. Unsecured concealed areas have been minimised and will be well lit. All common area and pathways will be illuminated.</p> <p>Residential communal open spaces are located on levels 1, 2, 3 &amp; 4 of the building which are secure, well lit, and generous in space to allow for multiple groups to congregate.</p>

#### PRINCIPLE EIGHT: HOUSING DIVERSITY AND SOCIAL INTERACTION

Good design responds to the social context and needs of the local community in terms of lifestyle, affordability, and access to social facilities.

OBJECTIVE	COMMENTS
<b>UNIT MIX</b> Response to the needs of the local Community.	<p>The proposed apartment buildings contain a wide range of apartment types, thus providing a number of options to various members of the community..</p> <p>30 of the one bedroom apartments will be rented to war widows and veterans at a maximum of \$90 per week, (CPI adjusted annually) based on pensioner assessments. The additional 24 one, two and three bedroom apartments will be leased in accordance with the NSW Retirement Village Act.</p> <p>All residential apartments of are compliant with the SEPP (Housing for Seniors or People with a Disability) 2004.</p> <p>100% of the units are the compliant with the Silver Level Liveable Housing requirements.</p>
<b>LOCATION</b> Access to the local community in terms of lifestyle, affordability, and access to social facilities.	<p>The proposed development is situated on Masons Parade just off the Central Coast Highway and is within 120m to the nearest bus stop. Buses regularly go to the Gosford Train Station which is about 1.3km from the proposed development. To the north of the site about 650m is the Gosford CBD.</p> <p>The site fronts Brisbane Water, with significant uninterrupted views to the west and south/west. The Gosford Olympic Swimming Pool is about 200m south/west of the site. The site is close to nearby cafes and restaurants and is in an ideal location with Gosford.</p> <p>As mentioned above under unit mix, 30 of the one bedroom units are rented to war widows and veterans with the remaining 24 apartments being leased in accordance with the NSW Retirement Village Act.</p> <p>The proposal sits as a backdrop to Brisbane Water. A consistent height along Masons Parade strengthens and enhances the streetscape to the waters edge, particularly when viewed from Brian McGowan Bridge.</p>

#### PRINCIPLE NINE: AESTHETICS

Quality aesthetics require the appropriate composition of building elements, textures, materials and colours and reflect the use, internal design and structure of the development. Please refer to the Architectural Design Statement.

OBJECTIVE	COMMENTS
<b>FACADES</b> To promote high architectural quality in facades which define and enhance the public domain.	<p>The façade of the building has a well organised visual presentation in the surrounding context, and consists of a cream coloured brick at the base, black aluminium balustrade with vertical baluster, roller blinds and white and grey cementel panels.</p> <p>The white cementel panel is applied to create refined tower elements that break the buildings mass, creating an elegant street façade appropriate within the streetscape.</p> <p>The detailing and material selection create a high standard architectural design that is appropriate to the site's specific location within the Gosford shoreline and its west facing orientation.</p>
<b>ROOF DESIGN</b> Roof treatments are integrated into the building design and positively responds to the street	<p>The LEP states that development in B4 mixed use zone should 'allow development in Point Frederick to take advantage of and retain view corridors while avoiding a continuous built edge along the waterfront.'</p>

	Communal spaces to the east and west break the massing of the facade, creating places for resident interaction and social engagement, maximising views to Brisbane Waters and the Landscaped Garden at the rear.
<b>AWNING AND SIGNAGE</b>  Awnings are to be provided to increase usability and amenity in public areas.  Signage is an important aspect in mix residential development.	Three dimensional awnings at the front and the rear of the site mark the main entrance to the proposed development, with signage visible from Masons Parade and integrated into the design of the building, appropriate to the scale, proportion and detailing of the development.

## SEPP 65 KEY STANDARDS

The following statement provides an assessment of the development against the State Environmental Planning Policy No 65 - Design Quality Principles of Residential Apartment Development, Apartment Design Guide

STANDARD	COMMENT
<b>VISUAL PRIVACY</b> To provide visual privacy during day/night, maximise outlook and views from private open space without compromising visual privacy, with recessed balconies.	Building separation has been provided with the design incorporating a 6m setback to the northern and southern boundaries. The balconies are angled toward the views to the west with fixed louvres provided for visual privacy from residents behind.  Building separation is increased to a 9m setback on level 5 and 6 to the southern boundary. The balconies intrude on the 9m side setback. Privacy screens have been incorporated in the design to provide visual privacy to those units.
<b>BICYCLE AND CAR PARKING</b> To minimise car dependency for commuting and promote alternative means of public transport, walking or bicycling. Underground parking where possible with ventilation.  Safe and secure access for building users.  Consider: - vegetation, canopy/shade trees, selection paving, screening from communal and private open space and bicycle parking	A traffic assessment report has been provided with the DA submission and a car parking rate is applied and consistent with the Guide to Traffic Generating Development.  The proposed car parking is compliant with Seniors Living SEPP.  All car parking will be well lit for security and safety. Ventilation to covered car parking will be in accordance with BCA requirements.
<b>SOLAR AND DAYLIGHT ACCESS</b> To ensure that daylight provided to all habitable rooms, ambient lighting to minimise the need for artificial lighting. Living rooms and open space for at least 70% of apartments to receive 3 hours direct sunlight in winter.	Apartment Design Guidelines (ADG) provides user concession ' <i>where significant views are oriented away from the desired aspect for direct sunlight.</i> ' The street frontage is to the west, with the best views of Brisbane Water to the south/west. Apartments have been designed to take full advantage of these views.  Excluding those units orientated toward significant views facing south and west, 30 of the 54 units are deemed exempt. 18 of the 24 units are compliant with the 3hr sunlight requirement between 9am and 3pm on 21 June. <u>This equates to 75% compliance.</u>
<b>COMMON CIRCULATION AND SPACES</b> To provide safety, amenity and durability as well as opportunity for casual social interactions among residents and assist with social recognition.	Complies with the design principles for excellent re The building design consists of separate but linked buildings around a courtyard. This creates separation between small groups of apartments and better amenity for the residents. Number of apartments off a single core does not exceed 12 (proposal has 11) and is reduced on upper levels.
<b>APARTMENT SIZE AND LAYOUT</b> To ensure that the apartments are functional, well organised, accommodate a variety of household activities and occupants needs.  Single – aspect apartments should be limited in depth to 8m from a window.  Cross over apartments 15 m deep should be 4m wide or wider to avoid narrow apartments.  The back of the kitchens should be no more than 8m from window.	The design provides for a mix of apartment sizes with a variety of one, two and three bedroom units with options of study. <ul style="list-style-type: none"> <li>• 1 bedroom + study – 56.25m<sup>2</sup></li> <li>• 1 bedroom + study (west facing) – 81.71m<sup>2</sup></li> <li>• 2 bedroom – 84.36m<sup>2</sup></li> <li>• 2 bedroom + study – 105.96m<sup>2</sup></li> <li>• 3 bedroom - 115.49m<sup>2</sup></li> </ul>
<b>CEILING HEIGHT</b> To provide a sense of space, penetration of daylight, flexibility of use, quality internal space.	The 2.7m floor to ceiling height is achieved for all units.



<p><b>PRIVATE OPEN SPACE AND BALCONIES</b></p> <p>To ensure apartments have private open space, which is functional for outdoor living. The design is integrated into the overall architectural form and to allow casual overlooking of street.</p>	<p>All primary balconies achieve the minimum requirements:</p> <ul style="list-style-type: none"> <li>• 1 bed : 8m<sup>2</sup>, 2m depth</li> <li>• 2 bed -10m<sup>2</sup>, 2m depth</li> <li>• 3 bed - 12m<sup>2</sup>, 2.4m depth</li> </ul> <p>The private open space area is functional and useable aimed to accommodate outdoor furniture. The provision of stacked sliding doors leading from living rooms to balconies ensures an extension of the living areas.</p>
<p><b>NATURAL VENTILATION</b></p> <p>Provision of each apartment with direct access to fresh air and to assist in promoting thermal comfort for occupants. Natural ventilation in non-habitable rooms, where possible. The design is to reduce energy consumption. <u>Overall 60% of apartment should have cross ventilation.</u></p>	<p>Building Design ensures that proposed apartments provide increased access to daylight and natural ventilation, with the central open courtyard creating a stack effect for hot air to escape the building while residences are cross ventilated.</p> <p>The apartments have a variety of depths and use corner units / cross through units to assist with ventilation. A wide central courtyard means all units are cross through units and are less than 14m in depth. All 54 units (100%) achieve cross ventilation.</p> <p>The development will comply with the required 60% cross ventilation, achieving 100%.</p>
<p><b>STORAGE</b></p> <p>To ensure that each apartment has adequate storage at rate defined SEPP 65.</p>	<p>The design provides for required storage within each apartment with additional secured storage space provided in the carpark area of the units.</p> <ul style="list-style-type: none"> <li>• 1 bedroom - 6m<sup>3</sup></li> <li>• 2 bedroom - 8m<sup>3</sup></li> <li>• 3 bedroom - 10m<sup>3</sup></li> </ul>











