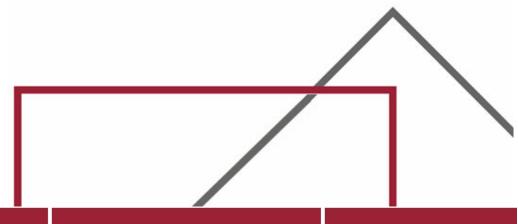




# Options Assessment and Review

Newport SLSC Alterations and Additions and Ancillary Works





# 1 Introduction

This Options Assessment has been prepared by Rhelm, in association with Northern Beaches Planning, on behalf of Northern Beaches Council to accompany the lodgement of an application seeking a review of the determination of Development Application DA2021/2173, which sought consent for alterations and additions to the Newport Surf Life Saving Club (**SLSC**) building at 394 and 394A Barrenjoey Road, Newport (**site**).

Development Application DA2021/2173 was refused by the Sydney North Planning Panel (**SNPP**) on 5 October 2022 for five reasons relating to:

- building height non-compliance,
- suitability of the site,
- coastal protection works,
- inconsistency with the Coastal Management Act 2016 (CM Act), and
- public interest.

#### This Options Assessment provides:

- a chronological timeline of events associated with the locality and the proposed development (Section 2);
- Evaluates the land management context and the range of constraints in the vicinity of the site (Section 3):
- Identifies the range of potential options for both the SLSC building and for the ancillary coastal protection works (Section 4); and
- Draws conclusions with regard to the selected option that was put forward in the development application (Section 5).



# 2 History

The chronological timeline of events associated with the Surf Club and the management of the beach as it relates to the proposal is summarised, as follows:

Date	Action						
1909 - 1911	Newport SLSC established. The first clubhouse was erected up on the hill at the back of Neptune Street. Due to its isolation, it was called LaSolitare <sup>1</sup> . After being in private ownership for a period of time, the land that forms the beach and its surrounds was purchased by Warringah Shire Council and the Department of Lands and on 8 April 1911 the beach was opened as a public beach (with dressing sheds near the shoreline).						
1915	Newport SLSC second building established, closer to the shoreline than the first building (La Solitare).						
1933	Newport SLSC third (and present) building established in its current location. The buildings were opened on 30 September 1933 <sup>2</sup> . The building is considered to be representative of Inter-War Mediterranean style club houses.  The building has been placed to give the maximum of convenience to surfers and those who safeguard the beaches (The Sun, 1 October 1933).						
1937, 1957 and 1962	External additions to the SLSC building were completed by 1937 <sup>3</sup> . Further extensions/modifications to the building were completed in 1957 and 1962. Evidence of Norfolk Pines planted in imagery dated 1950's <sup>4</sup> .						
1974	May/June 1974 coastal storm/erosion event ('Sygna storm' – placement of rock material and possibly other materials to protect the SLSC building).						
1980	Dune formation works to stabilise dunes after the 1974 event (PWD, 1985).						
1985	Warringah Shire Council <i>Coastal Management Strategy</i> (PWD, 1985) – Newport Beach section identified 'Consider relocating club away from active beach zone when it is to be replaced, extended or renovated'. The relocation site is shown immediately landward of the existing building location.						
2001	Alterations and additions completed for SLSC building.						
1 April 2005	Advertisements were placed in the Manly Daily advising of community consultation sessions in relation to a draft plan of management for Newport Beach. Signs were also erected throughout the Newport area, with letters also sent to key community groups.						
14 April 2005	A public meeting was held at Newport SLSC building in relation to the draft plan of management for Newport Beach.						
26 May 2005	A second public meeting was held at the community hall at Spurway Park in relation to the draft plan of management for Newport Beach.						
July – August 2005	The <i>Draft Ocean Beaches Plan of Management: Newport Beach</i> (Pittwater Council, 2005) was publicly exhibited.						

<sup>&</sup>lt;sup>1</sup> https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2270445, accessed 21 November 2022

<sup>2</sup> ibid

<sup>&</sup>lt;sup>3</sup> ihid

<sup>&</sup>lt;sup>4</sup> Aerial view across Newport Ocean Beach, looking east. (01/01/1950 - 31/12/1959),Northern Beaches Council, accessed 21 Nov 2022, https://northernbeaches.recollect.net.au/nodes/view/28501



Date	Action						
19 September 2005	The <i>Draft Ocean Beaches Plan of Management: Newport Beach</i> was presented to Council. Council subsequently deferred the matter to allow for further public consultation.						
21 February 2006	A public meeting was held with the community to discuss any necessary changes to the <i>Draft Ocean Beaches Plan of Management: Newport Beach</i> .						
23 March – 3 May 2006	The Amended Draft Ocean Beaches Plan of Management: Newport Beach was publicly exhibited.						
19 June 2006	The Ocean Beaches Plan of Management: Newport Beach was adopted by Council. The PoM supersedes all previous plans, including the PWD (1985) Coastal Management Strategy. No relocation of the SLSC building identified in the adopted PoM.						
June 2009	Pittwater LEP 1993 – Newport SLSC listed as an item of local heritage in the PLEP 1993 from this version of the LEP onwards and carried through to the PLEP 2014 when the 1993 LEP was repealed.						
2011	Newport SLSC approached the then Pittwater Council and identified issues with the club house and growing membership and suggested a process of community and member consultation that the Club would implement to gauge the views of our members and the local community, with a view to expanding the building and report back. The Council agreed.  See attached documents:						
	<ul> <li>Have your say on the Newport Clubhouse Masterplanning Process!!</li> <li>Newport SLSC Masterplan "Think Tank" presentation</li> <li>Newport Clubhouse Master planning questionnaire.</li> </ul>						
2012	Newport SLSC presented the Council with a position paper that identified feedback from members and the community and possible mass modelling options for the potential extension of the existing club facilities. The options included differing designs with extensions to the northern and western façades of the building, including a detached standalone building between the existing SLSC building and the playground, or at various locations in Bert Payne Reserve.  A preferred modelling option, with no standalone facilities, was subsequently agreed, with Council						
	<ul> <li>The proposal should work as closely as possible with the existing footprint of the building,</li> <li>Any expansion of the existing building footprint eastwards / northwards or southwards would likely be unsupported on Coastal Engineering grounds.</li> <li>The expansion of the Club facilities on the western side of the Clubhouse was would likely result in detrimental impacts upon the heritage fabric of the existing heritage Clubhouse.</li> <li>See attached documents:         <ul> <li>Newport SLSC Masterplanning Process Strategy Paper</li> <li>Stage 1 Masterplan</li> <li>Newport SLSC Club Expansion Masterplan &amp; Remote Public Amenities Block Options.</li> </ul> </li> </ul>						
2013	The Newport SLSC engaged and funded an architect to prepare a master plan for the SLSC (based on the preferred model) and its adjacent grounds to overcome agreed deficiencies with the building and critical pedestrian circulation issues in the public area adjacent the Club.						



Date	Action						
2014	The master plan was completed, and a number of meetings were held with Council to determine a way forward in order that the surf club could then fund and prepare a development application in cooperation with the Council.						
2015	Heritage significance updated 14 March 2015. The heritage listing indicates that 'The building should be retained and conserved. A Heritage Impact Statement should be prepared for the building prior to any major works being undertaken.'						
August 2017	The concept plan for the proposed alterations and additions to the Newport SLSC building, prepared by Daniel McNamara Architect, was notified to the local community with a request for comments and feedback.  See attached documents:  Concept Plans 2017						
September 2017	A What We Heard report collating the responses to the community consultation was released. 78 submissions were received in support, three were opposed to the proposal and one raised concern. The three in opposition raised concerns about potential impacts to the heritage significance of the building.  See attached documents:  • What We Heard Report						
December 2017	Council issued owners consent to lodge a development application for the proposed works.						
January 2018	A pre-lodgement meeting was held with Council with regards to the concept plan. The pre-lodgement report concluded:  There are two overarching issues that impact upon the viability of the proposal, namely the						
	heritage significance of the building and the coastal risk hazard that affects the site.  At this stage, insufficient information has been provided to confirm whether or not the proposal is acceptable with regard to these factors, and further information is required prior to the lodgement of any future application.						
	With respect to the coastal hazard, detailed construction information will be required to demonstrate that the majority of the existing structure is to be retained, and that both the retained structures and the new works can withstand the coastal hazard that affects the site.						
	With respect to heritage, Council's Heritage Officer (Janine Formica), is available for further discussions once a more comprehensive heritage impact assessment and conservation management plan have been prepared for the site.						
	The application also proposes a change to the amount and allocation of parking, which may require a change to the Plan of Management for Newport Beach. As changes to a Plan of Management are subject to public exhibition and input from key stakeholders, ideally this process should be undertaken prior to the lodgement of any future application.						
July 2019	Engineering investigations for the design of the proposed works commence.						



Date	Action						
January 2020	A separate proposal is announced with regard to the creation of a youth space, comprising a half-court basketball court, a handball court and exercise equipment, in the area between the existing Newport SLSC building and the playground to the west.						
February 2020	Further discussions were held between Newport SLSC and the Heritage Officers from Council.  Concerns were raised in relation to the dominance of the proposed additions on the western façade and the detailing of the eastern façade. Council advised:  This is not a new surf club building, but an addition to a Council owned and listed heritage item and retaining the heritage significance of this building should be Council's aim. As an owner of a heritage asset, Council has a responsibility to look after and manage the heritage significance of the building and set an example to private owners of heritage and the community generally.  As you know we have responded to Peter Horton on the coastal management issues. It would appear from his response that he may be recommending complete removal of the building, which we have indicated would be the only unacceptable option from a heritage point of view.						
February 2020	An Assessment of Options for the Redevelopment of Newport SLSC, with Updated Consideration of Risk from Coastal Erosion/Recession was prepared by Horton Coastal Engineering.  The options considered for the redevelopment of Newport SLSC we are follows:  1. current concept, no piles or seawall/revetment. 2. current concept, new portion on piles, no seawall/revetment. 3. current concept entirely on piles, no seawall/revetment. 4. demolish and rebuild on piles, no seawall/revetment. 5. current concept, no piles, with rock revetment protection. 6. current concept, no piles, with vertical or hybrid seawall protection. 7. demolish and rebuild, no piles, with revetment or seawall protection. See attached document:  • Assessment of Options for Redevelopment of Newport SLSC, with Updated Consideration of Risk from Coastal Erosion/Recession by Horton Coastal Engineering.						
June 2020	Coastal investigations are completed, with a decision made to proceed with a new seawall to protect the Newport SLSC building.						
November 2020 – January 2021	The revised concept plan was publicly exhibited.						
December 2020	Further coastal investigation was undertaken, with six different seawall designs.  See attached document:  • Initial Discussion on Potential Seawall Layouts at Newport SLSC by Horton Coastal Engineering.						
May 2021	A Community and Stakeholder Engagement Report was released. Over 80 percent of respondents indicated they either supported the proposed extension concept plan or supported it with (minor changes. 80 percent of respondents indicated the proposal would improve the existing facility. With regards to heritage, Council received 48 supportive and 44 unsupportive comments, with mixed sentiments.  See attached document:						



Date	Action
	Community and Stakeholder Engagement Report.
November 2021	The subject development application was lodged with Council.



### 3 Context and Constraints

# 3.1 Ocean Beaches Plan of Management: Newport Beach

The site is Crown Land and forms part of Crown Reserve No. 60118 – Farrells Reserve that is managed by Northern Beaches Council in accordance with the *Ocean Beaches Plan of Management: Newport Beach*.

The Newport SLSC building is located within the part of the reserve categorised for General Community Use, as shown in green on **Figure 3-1**.

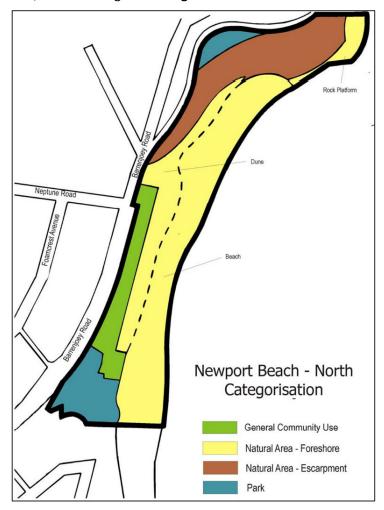


Figure 3-1 Categorisation Diagram of North End of Newport Beach (Source: Ocean Beaches Plan of Management: Newport Beach)

The Ocean Beaches Plan of Management: Newport Beach was adopted by Council on 19 June 2006, approximately five years prior to the commencement of the current proposal for alterations and additions to the Newport SLSC building. The Ocean Beaches Plan of Management: Newport Beach went through rigorous community consultation and is reasonably relied upon to inform the development potential of the site and the scope of works anticipated by the community at the subject site.

In accordance with Section 35 of the *Local Government Act 1993*, community land must be managed in accordance with the plan of management applicable to the land. With respect to the Newport SLSC building, the *Ocean Beaches Plan of Management: Newport Beach* anticipates that Council, together



with the Newport beach SLSC, are to maintain and upgrade the surf club building and surrounds as required, having regard to public safety. The proposed alterations and additions to the existing building, together with the ancillary coastal protection works, provide for the maintenance and upgrade of the Newport SLSC building, consistent with the provisions of the *Ocean Beaches Plan of Management: Newport Beach*.

The Ocean Beaches Plan of Management: Newport Beach does not contemplate the construction of separate buildings, or the demolition of the existing surf club building and the construction of a new surf club building elsewhere on the site.

Should any such options be considered, it is reasonable to assume that such buildings should be maintained within the part of the site designated for General Community Use, shown green in **Figure 3-1**. This would essentially limit the location of any new building to the current footprint, the youth area, and the carpark.

#### 3.2 Catchment Flooding

The central portion of Newport Beach, being the area to the south of the existing Newport SLSC building, was previously an entrance to a lagoon and is subject to catchment flooding, as shown in the extract of the Flood Hazard Map in **Figure 3-2**.

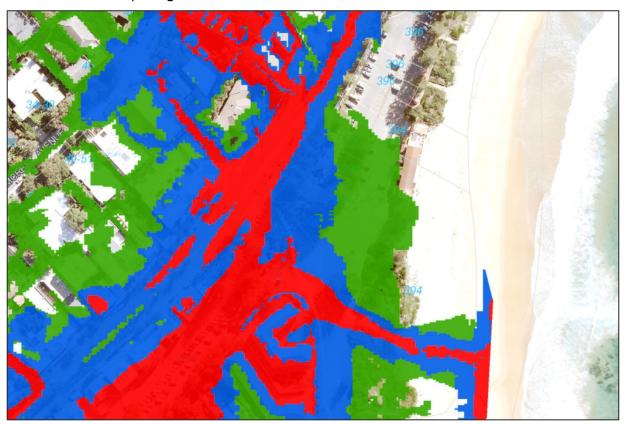


Figure 3-2 Extract of NBC Flood Hazard Map with low flood risk precinct in green, medium risk flood precinct in blude and high risk flood precinct in red (source: Northern Beaches Council)

The flood affectation of the land to the south of the existing Newport SLSC building significantly compromises the development potential of the site. In consideration of the applicable flood levels and



the degree/likelihood of the hazard occurrence, the existing park is not an appropriate location for a community facility or amenities building.

It is noted that the proposed additions at the northern end of the Newport SLSC building are generally beyond the extent of the flood hazard, as shown on **Figure 3-2**, and have been supported by Council's Flood Engineers.

#### 3.3 Coastal Hazard

The subject site is affected by coastal hazards, with the hazard lines depicted in **Figure 3-3**. In consideration of these hazard lines and noting the other constraints/hazards impacting the site, there is no other location at the site that could accommodate a new surf club building that was generally not affected by coastal hazards of some form.

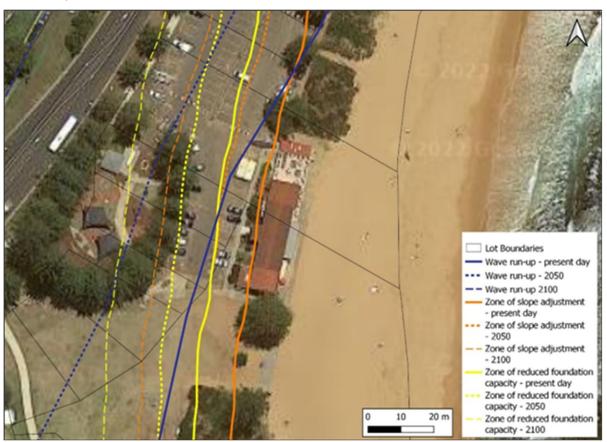


Figure 3-3 Coastal hazard lines (after: Worley Parsons, 2015), aerial image: Google Satellite, 12 March 2018

#### 3.4 Heritage

The Newport SLSC building is identified as an item of local heritage significance, as shown on the Heritage Map of PLEP 2014 and as listed in Schedule 5 of PLEP 2014. The building has been listed as a heritage item since 2009.

Throughout the design process, the need to retain and preserve the existing heritage building has been emphasised by Council and the local community. Council was particularly strong in their position to preserve the existing heritage building, as communicated to the Newport SLSC club in February 2020:



This is not a new surf club building, but an addition to a Council owned and listed heritage item and retaining the heritage significance of this building should be Council's aim... As an owner of a heritage asset, Council has a responsibility to look after and manage the heritage significance of the building and set an example to private owners of heritage and the community generally.

As you know we have responded to Peter Horton on the coastal management issues. It would appear from his response that he may be recommending complete removal of the building, which we have indicated would be the only unacceptable option from a heritage point of view.

The historical feedback from Council categorically ruled out any possibility of demolishing/relocating the surf club building, with other options involving standalone facilities also discouraged due to impacts upon the heritage curtilage.

It is also noted that the most significant aspect of the existing building is its direct visual connection and views to the beach. This is unable to be achieved or replicated in any other location at the site.

The proposed additions are generally maintained within the footprint of the existing building, with a contemporary extension at the north-western corner that has been sympathetically designed so as not to detract from the significance of the existing building. This approach has been supported by Heritage 21 and Council's Heritage Officers to date as being an acceptable approach to ensure the heritage significance of the building, consistent with the provisions of clause 5.10 of PLEP 2014.

#### 3.5 Parking

The carpark to the north-west of the Newport SLSC building is utilised as a "Park and Ride" facility and provides parking for visitors to the beach, the park/reserve and the nearby commercial village. During winter months, the northern end of the carpark is also used for winter sports including netball, basketball and tennis.

In the time since the proposal was originally initiated, the use of the carpark for parking associated with the B-Line was also contemplated and community sentiment regarding the lack of parking within the Newport Village has been strong in response to Development Applications for medium density development. In this respect and noting the popularity of the area in the summer months, all efforts have been made to ensure that any proposed development does not result in the loss of public parking.

As such, a detached building within the carpark to the north-west of the existing building was not considered to be a viable design option.

Further to the above and in accordance with advice received from Traffic and Transport Planning Associates (TTPA; dated 24 February 2023), the construction of a new SLSC building in another location in the car park would result in an unacceptable level of impact on the car park. If a new SLSC building were located on the flood free land within the car park, and considering only the curtilage of a new SLSC building, TTPA estimated a loss of 50-55 car spaces (and up to 65 car spaces). TTPA (2023) considered that the loss of 50-55 car spaces would have significant impacts in relation to:

- Further parking intrusion into residential streets;
- Significant enter, search and depart movements, heightening the movements at the Barrenjoey Road access;
- Higher demands on the other Council car parks nearby that support businesses in the Newport strip;
   and
- The parking available for commuters using the bus services to/from the City (e.g. B-Line).



# 3.6 Underground infrastructure

A dial before you dig search conducted on 17 November 2022 reveals that a large Sydney Water sewerage main (1050 mm diameter) is located along the eastern side of Barrenjoey Road, as demonstrated on **Figure** 3-4. There are also large Council stormwater assets in the locality, largely to the south of the existing SLSC. These are shown overlaid with the 1050 mm diameter sewer on **Figure** 3-5.

The location of this infrastructure and the associated exclusion zones largely prevents the construction of any new buildings along the western extent of the subject site.

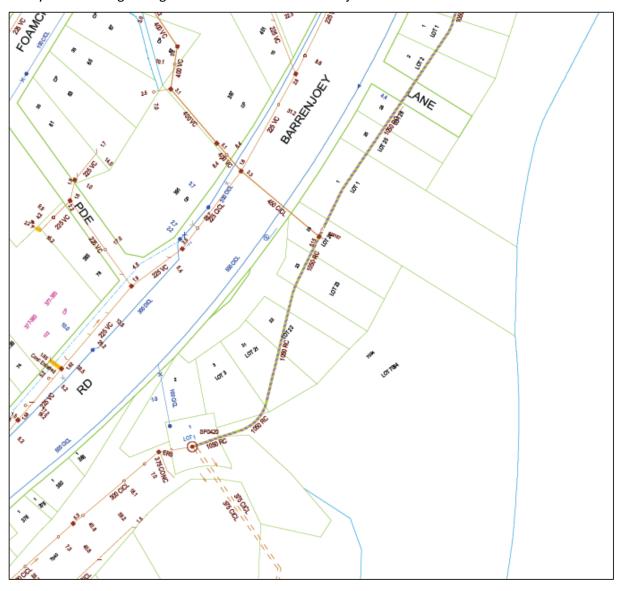


Figure 3-4 Sydney Water assets (source: DBYD search 17 November 2022)





Figure 3-5 Council stormwater and Sydney Water main sewerage line (source: DBYD search 17 November 2022)

#### 3.7 Vegetation

The Sydney Metro Area V3.1 2016 E-VIS 4489 vegetation mapping indicates the adjacent due vegetation is PCT 772 Coast Banksia – Coast Wattle dune scrub of the Sydney Basin Bioregion and South East Corner Bioregion. This is shown in **Figure 3-6**.

There are no Threatened Ecological Communities associated with this PCT.

#### 3.8 Operational requirements

The Newport SLSC building has a direct connection to the beach along its entire eastern facade. This is not only significant from a heritage perspective, but also with regard to the functionality and operation of the club.

The proximity of the building to the sand enables direct and unimpeded surveillance of the foreshore area for life saving purposes and provides an ease of access to move necessary equipment to the shoreline.

Relocating the surf club building to the north-west of its current location would not be advantageous to the operation of the club, noting that it would be separated from the foreshore by the dunes, with limited direct connectivity to the sand.

The location of the existing building, which contains public amenities, is also centrally located for use by visitors to the beach, the reserve, and the playground/youth area alike. This would also be compromised



if the building was to be relocated into the carpark to the north-west, with the ability to provide separate amenities to the south challenged by the flood affectation of the land.

### 3.9 Constraint Summary

**Figure 3-6** shows an overlay of the range of constraints at the site and indicates that the majority of the land in the vicinity of the SLSC has some form of constraint that affects development. **Figure 3-6** indicates that there is a small area to the north of the existing SLSC (within the carpark) that does not have a flood constraint and that is landward of the Sydney Water sewerage system, but it is noted that the area is encumbered by coastal hazards (erosion and inundation).

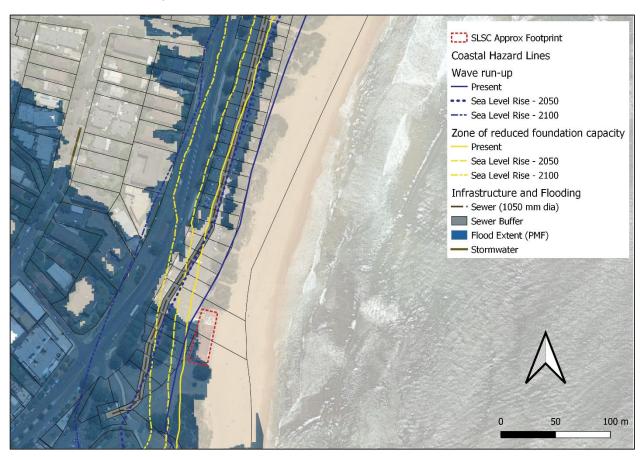


Figure 3-6 Mapped constraints - Newport SLSC and surrounds



# 4 Options

There are a range of options to meet the needs of the SLSC operations and ongoing provision of public amenities. These are options can be evaluated broadly in two categories:

- Built form options (Section 4.1); and
- Coastal protection/building foundation options (Section 4.2).

Many of these options have been explored and documented as part of studies to inform the development application and where this is the case, it is noted below.

The combination of built form and coastal protection/building foundation options with respect to the option selected for the development application is explored in **Section 4.3**.

#### 4.1 SLSC Built Form Options

Key options for meeting the needs of the SLSC operations and provision of public amenities with respect to the built form are:

- Option SLSCB 1 Do nothing;
- Option SLSCB 2 Alterations and additions to existing building (explored in the Daniel McNamara Architect Stage 1 Masterplan, 2013 Options 1 – 4);
- Option SLSCB 3 Retain existing heritage building and construct supplementary buildings (for example, explored in the SLSC options assessment of 2012 as amenities buildings Options 1 and 2, to the west and south of the existing building);
- Option SLSCB 4 Demolish existing building and build new building (existing location); and
- Option SLSCB 5 Demolish existing building and build new building (different location).

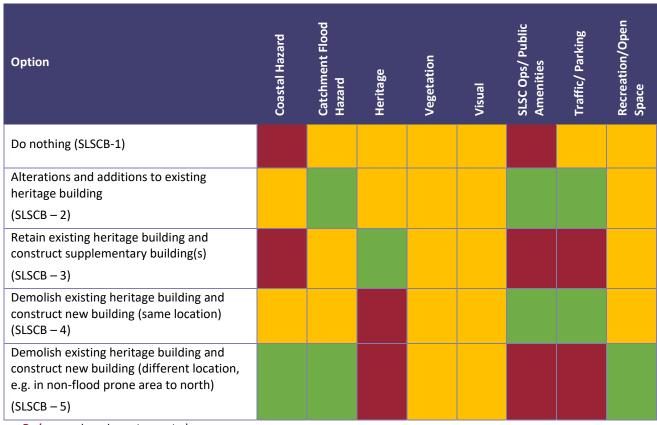
An overview evaluation of each option against the range of environmental and social issues and constraints described in **Section 3** or in the Coastal Summary Report (Rhelm, 2022) is provided in **Table 4-1** using a traffic light system:

- Red meaning impact expected
- Yellow meaning neutral effect expected (no change from existing)
- Green meaning impact can be managed or no impact.

**Table 4-1** identifies that Option SLSCB -2 - Alterations and additions to existing heritage building provides the greatest benefit with the least impacts.



**Table 4-1 Overview of Built Form Options Evaluation** 



Red – meaning – impact expected

Yellow – meaning – neutral effect expected (no change from existing)

Green – meaning – impact can be managed or no impact.

#### 4.2 Coastal Protection Works/Building Foundation Options

As evident in the Assessment of Options for Redevelopment of Newport SLSC, with Updated Consideration of Risk from Coastal Erosion/Recession by Horton Coastal Engineering, a range of different design options for coastal protection works were explored between June 2018 and September 2020. The Horton descriptions have been retained below and the options separated into the various coastal protection works/building foundations options:

- Current concept (Proposed SLSC Alterations and Additions), no piles or seawall/revetment (i.e. retain existing ad-hoc rubble seawall) (Coastal Protection/Building Foundations do nothing, Option CP-1);
- Current concept (Proposed SLSC Alterations and Additions), new portion on piles, no seawall/revetment (Coastal protection/Building Foundations – do nothing and part piled building foundations, Option CP–2);
- Current concept (Proposed SLSC Alterations and Additions) entirely on piles, no seawall/revetment (Coastal protection/Building Foundations – do nothing and all piled building foundations, Option CP-3);
- Demolish and rebuild on piles, no seawall/revetment (Coastal protection do nothing and all piled building foundations, Option CP–4);



- Current concept (Proposed SLSC Alterations and Additions), no piles, with rock revetment protection (Coastal protection new rock revetment, Option CP–5);
- Current concept (Proposed SLSC Alterations and Additions), no piles, with vertical or hybrid seawall protection (Coastal protection vertical/hybrid seawall, Option CP–6); and
- Demolish and rebuild, no piles, with revetment or seawall protection (Coastal protection revetment/seawall). This options was not considered further as it is effectively covered under other options

There is also a further option, which is coastal protection via setback and dune reinstatement (Option CP–7).

An overview evaluation of each option with respect to risk is provided in **Table 4-2** using a traffic light system:

- Red meaning increased risk (for example risk of damage to an asset or adjacent property)
- Yellow meaning neutral change to risk expected (no change from existing)
- Green meaning reduction in risk (e.g. to an asset) or improvement in the management of a risk.

Table 4-2 Overview of Coastal Protection/Building Foundation Options Management of Risk

Option	Present Erosion Hazard	Present Inundation Hazard	2100 Erosion Hazard Heritage	2100 Inundation Hazard	Beach Amenity	SLSC Ops	Effects on Other Property	Building Stability
CP/BF -1 - Do nothing								
CP-2 – Do nothing and part piles								
CP-3 and CP-4 – Do nothing and all piles								
CP-5 – No piles, New rock revetment								
CP-6 – No piles, vertical or hybrid seawall								
CP-7 – No piles, dunes and setback								

**Red** – meaning – impact expected

Yellow – meaning – neutral effect expected (no change from existing)

Green – meaning – impact can be managed or no impact.

**Table 4-2** identifies that Option CP-5 – No piles, New rock revetment and Option CP6 – No piles, Vertical or hybrid seawall seek to manage risks. Note that the 'do nothing' option does not assist with the



reduction of risk to existing assets and public safety (e.g. from wave overtopping), in addition to which doing nothing exposes the existing built asset to a greater risk over time.

# 4.3 Selected DA Option

The assessment of options in **Table 4-1** and **Table 4-2** demonstrates that the combination of the proposed alterations and additions (SLSCB -2) and ancillary coastal protection works (CP-5 or CP-6) such as those proposed in the development application can either manage the potential impacts or risks or have neutral effect on the range of key issues and risks for the locality.

The design approach taken for the site that is presented in the development application represents a suitable combination of options to meet the present needs as it provides for the retention and preservation of the existing heritage listed Newport SLSC building for 60 years, in addition to the protection of the two closest Norfolk Island Pines, which are identified as being contributory to the significance of the building.



# 5 Conclusion

Newport SLSC and Council considered various alternate design solutions to address the competing constraints associated with the subject site. This options assessment has identified that the proposed design solution is considered to be a reasonable approach to the redevelopment of the site, which appropriately balances the various factors at play.

The consent authority can be satisfied that the proposed seawall will not result in any adverse impacts upon the amenity or function of the beach or intertidal zone and will not impinge upon public access to/from the beach. The proposed seawall is far superior to the existing rock wall to the east of the Newport SLSC building that was constructed following the 1974 storm event, with the proposed development providing for enhanced access following a significant storm event compared to that which currently exists.



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