



14 November 2024

General Manager  
Northern Beaches Council  
PO Box 1336  
Dee Why NSW 2099

Attention: Maxwell Duncan Principal Planner Development Assessment – South Team  
[maxwell.duncan@northernbeaches.nsw.gov.au](mailto:maxwell.duncan@northernbeaches.nsw.gov.au)

Dear Maxwell

**RE: DEVELOPMENT APPLICATION DA2023/0998  
ALTERATIONS & ADDITIONS TO FSLSC**

We refer to the Council RFI letter of 16 November 2023 regarding a list of issues identified in the preliminary assessment of this development application, the Internal Referral reports available via the Council website, Council email of 9 October 2024 regarding the additional responses received from the independent planner and Council heritage advisor, and our Teams meeting held 24 October. On behalf of Freshwater Surf Life Saving Club, we have prepared further supporting information and amendments in response to the issues raised.

The issues identified and the supporting information and/or design amendments in response are itemised below.

**1. Heritage Impact of the proposal**

***The works to the front of the original building, including the new eastern balcony extension and eastern awing are not supportable. The drawings should be amended to not include those additions. It is noted the 2020 pre-lodgement plans and elevations are significantly different to the current DA with the western end of the SLSC complex being enlarged for the current proposal. (See details of the Heritage Referral response online).***

- The extension of the existing Freshwater Room balcony and awnings above have been deleted.
- The existing balcony is now retained in its present form, together with the small balcony adjoining the proposed Members Lounge and minor roof elements added to the southeast elevation during the 1986 works to the Clubhouse.
- The overall height of the new building works proposed has been reduced by 0.25m, the maximum reduction in height available while retaining compliant habitable room ceiling heights within the existing level 3 Caretakers apartment.
- The maximum height proposed for the new building works, RL 14.10, is 1.09m lower than the maximum height of the existing building, RL 15.10.

**Further comments received 9 October 2024**

**However, the balustrade needs to be timber, as does the balustrade to the member's terrace. Metal/steel is inappropriate for this heritage building.**

**Apparent width of the building when viewed behind the heritage section is still too wide. This impact can be reduced by pulling in the timber screen eaves to the north and south to the building line and simultaneously reducing the extent over the north and south verandahs.**

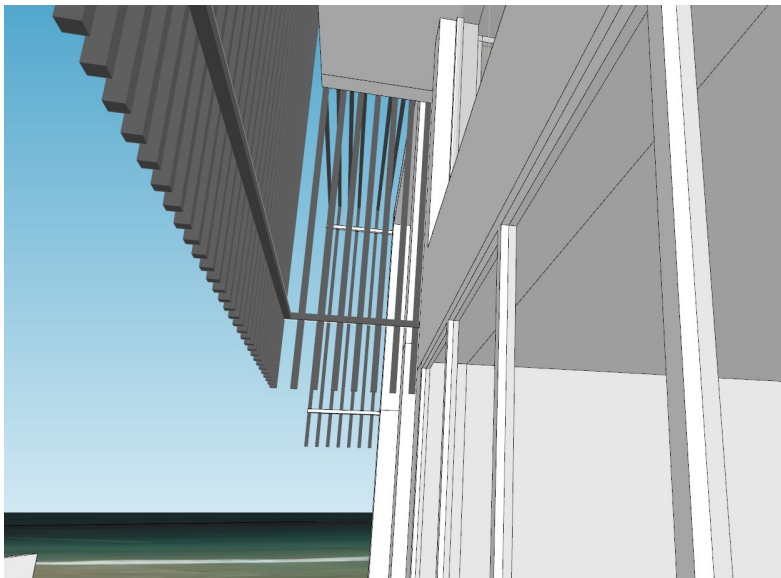
**Unresolved – Freshwater Room internal treatment but note that this could be discussed at a later stage.**

**Unresolved – Full extent of external colours and materials to heritage section but can also be discussed at a later stage.**

**Unresolved – Management of construction impacts to retain section but can also be discussed at a later stage.**

**Additionally, there were discussions about maintaining the visibility of the eastern elevation of the original clubhouse. The proposed design obstructs the view of the eastern façade.**

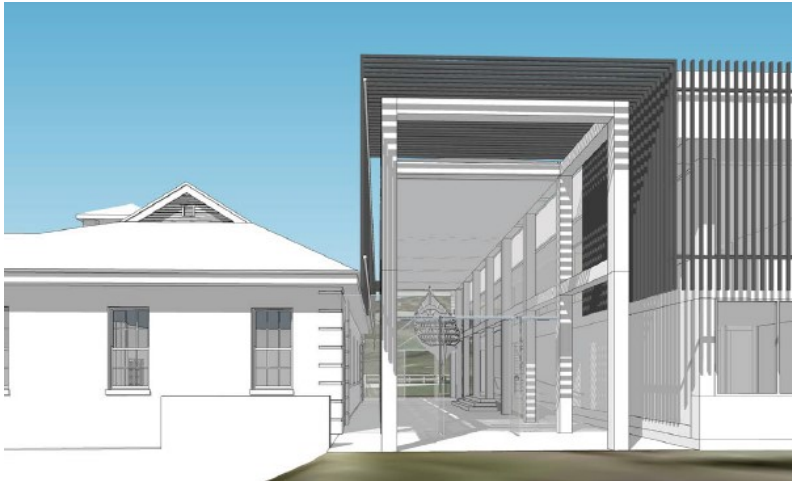
- The existing timber balustrades installed to the balcony of the 1935 building as part of the 1986 building works are retained, and this timber balustrade design is now repeated to the Member's Terrace.
- Regarding pulling the timber screen to the building line, the timber shade screens proposed align to the north and south with the existing roof plan, including the existing eaves line over. This location for screens provides sufficient space between timber screen and window glazing to provide shading from sun, shelter from breezes, will allow windows to be openable and provide sufficient space for cleaning and maintenance. We disagree with the comment suggesting the timber screen should be reduced to be flush with the building line, as this would prevent all the above. The proposed location of the timber shade screens relative to the external wall and roof eaves over is as shown in the image below.



View of northeast elevation showing timber shade screens and existing roof line over.

- We also disagree with the comment suggesting a reduction in the north and south verandas is required. In the current design, the length of the Museum of Surf (MoS) matches the length of the 1935 building, and the width of the north and south verandas matches the width of the adjoining 1986 building, thereby providing an appropriate transition of built form from one to the other.
- Further, the MoS cannot be reduced in area due to the number and volume of heritage artifacts available for display.

- Further, the MoS has been designed for maximum transparency via extensive glazing to allow the 1935 building to be visible “in-the-round”, and to reference the former location of the coastal walk circa 1935. The verandas proposed at either end of the MoS, and the timber shade screens, provide this glazing with shade from northeast and southwest sun. As excessive UV and sunlight will adversely affect any artifacts displayed in the MoS, the verandas are required to provide protection of heritage artifacts and shelter for visitors at entry. The shading provided to the MoS glazing by the North Veranda is as shown in the image below.



View of North Veranda shading and glazing to northeast elevation of MoS

- Further, the set out of the columns forming the MoS at the ends of the northern and southern verandas aligns with the columns to the north and south elevations of the 1986 building. Between these ends, the columns within the MoS align with the engaged piers of the 1935 building and the semi-circular timber double hung windows between the engaged piers. Accordingly, the set out of columns provides an appropriate transition between the 1935 and 1986 buildings which together comprise the FSLSC building. The alignment of the MoS columns with the existing 1935 building engaged piers and 1986 building columns is as shown in the image below.



View of MoS building showing alignment of MoS columns with 1935 building engaged piers and windows

- Further, the external stairway to the northern end of the 1935 building is part of the original heritage fabric and connects the beach to the FSLSC entry. The present

design celebrates this beach/Club arrival axis via the column location and width of the North Veranda, which approximates the width of this existing 1935 stairway, thereby providing an appropriate address point to the clubhouse from the beach. The connection of the North Veranda with the existing 1935 access stairs to the beach is as shown in the image below.



View of 1935 building stairway connection with North Veranda

- We note that a similar arrangement exists at the South Veranda, where a retained portion of the 1935 building provides a Board Store at Level 1 and a Members Terrace above at Level 2. The present column location and width of the south veranda approximates the width of the Members Terrace and Board Store below, thereby providing an appropriate connection between the Members Terrace and the clubhouse. The connection of the South Veranda with the existing 1935 building Members Terrace is as shown in the image below.



View of Members Terrace connection with South Veranda

- To provide a rigorous assessment of the existing versus proposed visibility of the FSLSC 1935 building, B+A have provided additional photographs and 3D model views illustrating the entry approach to the building from the north (Kooloora Avenue and the Council carpark), from the west (Gore Street and Moore Road), and views from Freshwater Beach. These additional views are contained in the **Visual & View Impact Assessment 15 October 2024 Issue B** attached. We suggest the visibility of the eastern elevation of the “original clubhouse” provided is an appropriate urban design and heritage outcome. While it is not material, we also note that the HIS confirms the 1935 building is not the “original clubhouse”, which is illustrated in the 1912 image below.



Freshwater SLSC Clubhouse 1912

## 2. Excessive Bulk and Scale

**The proposed additions result in a building with excessive bulk and scale. The increase in the building envelope is substantial, extending 6m to 12m to the west resulting in an increase to the building footprint of approximately 235m<sup>2</sup>. This is contrary to the frequent claims in the Statement of Environmental Effects (SEE) that the proposal has a built form with a similar envelope and footprint to the existing building. The proposed development is substantially increasing both the building envelope and the building footprint. The proposal is inconsistent with the objectives of Clause D9 Bulk and Scale of Warringah Development Control Plan (WDCP) in that;**

- **The design presents as a large high box with a dominating visual impact on the surrounding public recreational parkland and the coastal environment. Some shaping to the corner void elements behind the original building and western end (including the void), in sympathy with the original roof angles / pitch would assist to remove bulk & scale.**
- **The visual impact of the development has not been minimised, with the numerous voids, large roof overhanging the west verandah, the timber batten screen surrounding the north, south and west elevations, additional badminton court, large gymnasium, the 163-seat restaurant, plus a separate 62-seat café all contributing to a community facility with excessive bulk and scale.**
- **The accuracy of the gross floor area (GFA) numbers on the plans and in the schedules (refer to Drawing DA219) is questioned, noting that proposed gymnasium of 79m<sup>2</sup> is severely underestimated.**

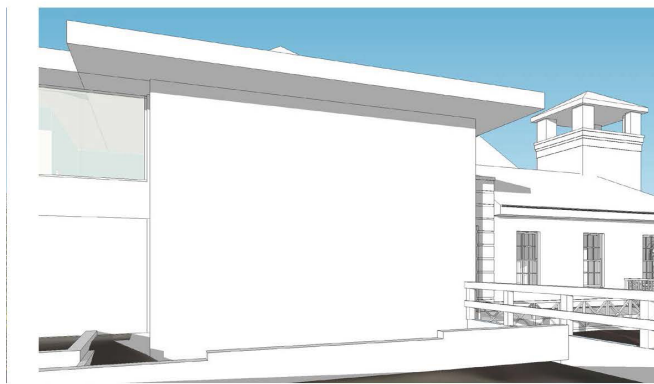
- The northwest extent of building envelope proposed has been significantly reduced.
- At level 1 the building envelope is unchanged from the existing 1986 building.
- At level 2 the proposed extension to the west has been deleted. The roof area proposed provides cover to an existing Club Terrace area. The existing Café Kitchen and Storerooms have been removed. Together, these design proposals provide a Western Veranda and activate the connection between the Club and Freshwater Reserve. Beneath this roof, the fully enclosed covered area proposed for the western end of level 2 is less than the currently existing Club premises. The café has been deleted, and the revised design proposes only one food and beverage venue located in a similar location to the existing café.
- At level 3 the Gymnasium is retained. However, the Gymnasium has been "telescoped" within the building envelope to reduce bulk and the Multi-Purpose Hall below has been reduced accordingly.
- The additional badminton court has been deleted from the design.

- The visual impact of the proposed development is illustrated in the B+A Visual & View Impact Assessment attached, which provides a comparison of the existing and proposed building envelopes.
- The GFA numbers on the plans have been adjusted to reflect the revised design.

**Further comments received 9 October 2024**

***This bulk and scale appear to have been adequately reduced with the exception of the two storey height of the connecting 'museum' and its impact on the heritage significance of the original surf club. I will defer to Council's Heritage officer on this matter.***

- The internal volume proposed for the MoS is necessary to display the heritage artifacts available, including the Duke's surfboard, a unique artifact, and a rare double ended surf boat, one of only two remaining. We also note that it is similar in height to the existing FSLSC Heritage Room that the Museum of Surf replaces. This is illustrated by the existing versus proposed FSLSC building images as shown in the images below.



- Refer also to the additional commentary provided above regarding the heritage impact of the proposal.

**3. Inconsistent with the Zone objectives**

***The proposed development is inconsistent with the objectives of the RE1 Public Recreation zone in that;***

- ***The proposed extension to the west encroaches into the public open space including the highly utilised coastal walkway. The proposal therefore fails to protect and enhance the natural environment for recreational purposes.***
- ***The proposed development, due to its excessive bulk and scale, fails to protect the aesthetic value of public land, including the heritage values of the original club building.***

- At Level 2 the proposed extension to the west has been deleted. The roof area proposed provides cover to an existing Club Terrace area. The existing Café Kitchen and Storerooms have been removed. Together, these design proposals provide a Western Veranda and activate the connection between the Club and Freshwater Reserve. Beneath this roof, the fully enclosed covered area proposed for the western end of Level 2 is less than the currently existing Club premises.
- Regarding the FSLSC relationship with the coastal walkway, the Council RFI does not consider the Freshwater Beach Masterplan adopted by Council 22 May 2018. This masterplan, which proposed extensions to the existing FSLSC towards the west, is attached.
- The Council RFI also does not consider the Freshwater Beach Masterplan Implementation subsequently prepared by NewScape Design. This implementation plan, attached, proposed that the landscape works to the Freshwater Beach reserve proceed in stages, the first stage of which commenced mid-2023. The most recent masterplan implementation drawings available, NewScape Design Freshwater Beach Masterplan Implementation Landscape Drawings Tender issue J 230904, are attached.
- NewScape are also providing the landscape design for FSLSC, and the design prepared for the Club is integrated with the overall masterplan, including the location of the coastal walkway.
- The design proposed has been reduced in bulk and scale. Please refer to revised development application drawings and Visual and View Impact Assessment attached.
- The Landscape design has been further revised by NewScape and is attached. Refer **NewScape Landscape Drawings** issued 15 November attached.

***Further comments received 9 October 2024***

***The amended proposal appears to be generally in accordance with the zone objectives. However, will require evidence of the approval new public amenities before supporting the removal of the existing public amenities from the existing clubhouse.***

***The masterplan labels the outline of the new amenities building as 'future works'. More certainty is required or perhaps this can be addressed by condition of consent requiring the construction of the public amenities before works can commence on the SLSC.***

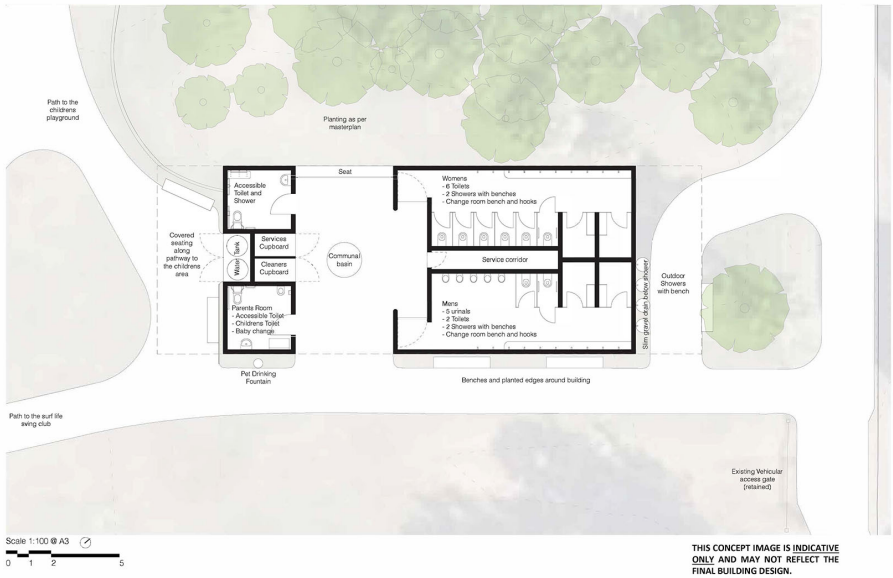
- The new public amenities are a current Northern Beaches Council (NBC) project, and we understand that the proposed FSLSC works cannot proceed until the existing public amenities have been replaced. The Concept Design for these new amenities is presently available via the NBC website and is illustrated below for convenience.
- An appropriate condition of consent could require the existing public amenities within the FSLSC building to be maintained until the new public amenities are commissioned and in use.



Site location of proposed amenities building



Floor plan of proposed amenities building



East elevation of proposed amenities building





#### **4. Inconsistent with the Coastal Lands Plan of Management**

**The proposed development is assessed as inconsistent with the Coastal Lands Plan of Management (PoM). The proposal is not in keeping with the recreational values of the coast and has not demonstrated an acceptable level of general community usage within the building.**

- **The 'shared use principle' which requires an acceptable level of general community use of the buildings has not been demonstrated. For example, what parts of the building will the public have access to and what parts of the building are exclusively for members of the SLSC or patrons of the restaurant/café? Will the proposed Museum of Surf be open to the public?**
- **The proposal reduces the GFA of the public amenities and removes all publicly accessible showers. The SEE notes that the public amenities will eventually be removed completely from the facility.**
- **The proposed westward expansion of the building encroaches into the public open space and obstructs the existing coastal walkway.**
- **The proposed expansion of Freshwater SLSC is not listed in the Action table or Master plan for the Coastal Lands PoM.**
- **In reference to recreational facilities, the PoM refers to "moderate improvements being recommended in conjunction with a focus of restoring and improving existing facilities". The proposed development is assessed as a major improvement to the existing SLSC.**

- The MoS will be open to the public.
- The publicly accessible change rooms, showers and toilets are outdated, and Council has previously resolved to remove them from the FSLSC building and relocate them elsewhere in the Freshwater Beach Reserve. This decision of Council has enabled the Club to consider other uses for those portions of the building occupied by these amenities.
- The proposed expansion westward has been deleted and the design is integrated with the landscape design of the Freshwater Beach Reserve, including the location of the coastal walkway.
- We understand that the masterplan for the Coastal Lands PoM may not have been updated by Council to reflect either the Freshwater Beach Masterplan, adopted by Council 22 May 2018, or the works proposed to FSLSC by this development application. We suggest that, given the Council works currently underway within the Freshwater Beach Reserve, the PoM may require an update.

#### **5. View assessment**

**Given the substantial increase in the building envelope created by the additional GFA combined with the internal voids and large enclosing shade structure, public and private views may be impacted. Further analysis is required to accurately assess view impacts, including the erection of a building template. View considerations (photomontages) will need to include appropriate residential locations from Gore Street, Undercliff Road and Ocean View Road.**

- A Visual & View Impact Assessment, which identifies public and private view vantage points agreed with Council, provides a photographic image, existing 3D model and proposed 3D model view from each location is attached.
- We suggest that the erection of a building template and/or professional photomontage views prepared in accordance with the Court's requirements would impose an additional cost on the Club which may not be required following the revision of the design and provision of the B+A **Visual & View Impact Assessment Issue B 15 November 2024.**

#### **6. Electronic Model**

**The Northern Beaches Council's Development Application & Modification Lodgement Requirements states that an electronic model must be submitted for all developments exceeding \$10 million (other than subdivision). Given the cost of development exceeds \$10 million and given the visually prominent location of the proposal, an electronic model is required.**

- Following the reduction in the size of the proposed development, the cost of development will no longer exceed \$10M. Accordingly, an electronic model is no longer required.

## **7. Restaurant and Café Plan of Management**

**The proposal replaces the existing kiosk with a large restaurant and a separate café. Further details are requesting regarding the operation of the restaurant and café. A draft Plan of Management is required to address such issues as:**

- **Hours of operation**
- **Floor Layout**
- **External Lighting**
- **Noise**
- **Function capability (receptions and the like)**
- **Security**
- **Complaints handling**

- A Draft Operational Management Plan- Freshwater SLSC Building is attached.

## **8. Acoustic report**

**Given the large number of people that the new restaurant can cater to, and the outdoor terrace/verandah area and the close proximity to the residential receivers along Gore Street (less than 100m), an acoustic report is required. The acoustic report is to be prepared by a suitably qualified person to determine if any adverse noise impacts from the development are likely to occur. The acoustic report is to detail all sources of noise from the development once operational and assess whether the noise can cause an adverse impact on residential receivers and if so, what mitigation measures can be applied to reduce noise to an acceptable level. The acoustic report is to include the following noise sources, but not limited to, noise from the gymnasium, patron use of the restaurant, including the terrace, music noise (if relevant), badminton games.**

An Acoustic Report prepared by GHD is attached. The report concludes:

*"GHD has prepared this acoustic assessment to predict noise emissions from the proposed development to nearby noise sensitive receivers. The assessment has considered noise emissions from café operations, gymnasium operations, multipurpose hall operations and from mechanical plant noise emissions.*

*The results of the noise modelling indicate compliance with the relevant noise assessment criteria for each source of noise and the proposed development should not unduly disturb the quiet and good order of the neighbourhood or adversely impact any residential receivers.*

*Recommendations have been made in Section 5 in regard to management measures and for further assessment of mechanical plant noise emissions to be undertaken once the design has progressed sufficiently."*

## **9. Carparking and Traffic**

**Council's Traffic Engineers do not support the proposal. Please refer to their detailed comments on Council's website.**

- In response to the NBC Traffic Engineer Referral Response dated 10 November 2023, Traffix have provided additional information addressing each of the issues raised by Council. Refer **Letter in Response to RFI- Traffic Engineering Consultant Services dated 15 November by Traffix**
- Traffix have also provided a Loading Dock management Plan. Refer **to Loading Dock Management Plan (LDMP) dated November 2024 by Traffix**

## **10. Survey and Landscaping Detail**

**Council's Urban Designer has requested the following additional information.**

***i. An updated survey – Some trees that appear on the survey aren't apparent on site, and some trees on site don't appear on the survey. Some of the tree canopy sizes shown don't appear to relate to the size of the canopy on site.***

***ii. An updated demolition plan (from the updated survey) showing all trees, vegetation, and items proposed for removal. It is also unclear if an existing fence to the south of the building is being partially removed, and it is not noted on the survey.***

***iii. Show how the landscape ground levels in the proposed 'Landscape Masterplan' integrate & relate to the works in this proposal. This should include contours and spot levels of the existing and proposed and the integration of the proposed works into the Landscape Masterplan.***

- The survey information used for this development application was provided by Council and is the same survey information used by NewScape Design for the Freshwater Beach Masterplan implementation works. Accordingly, the landscape works proposed for the Freshwater Reserve and the FSLSC are coordinated.
- However, for completeness FSLSC have commissioned an updated site survey plan be provided by Byrne & Associates and this plan is expected to be available early week commencing 18 November 2024.

***11. Details regarding interim operation of surf lifesaving during construction An Operational Management Plan (OMP) is required to detail the operation and management for a temporary facility at Freshwater SLSC during the construction phase of the proposed development including access to public amenities.***

- The Club confirms that the proposed works will be staged and that all Club operations will remain contained within the existing lease boundary and FSLSC facility. A Staging Plan is provided, refer DA220 Issue A.
- As previously advised, the existing public amenities will be relocated to new amenities following an independent decision of Council to do so. We understand that these works are currently at the design stage.

We enclose revised and additional development application documents as follows:

B+A Architectural Drawings

- DA 200 Issue B Location Plan
- DA 201 Issue B Site Analysis Plan
- DA 202 Issue D Site Plan
- DA 203 Issue C Level 1 Demolition Plan
- DA 204 Issue C Level 2 Demolition Plan
- DA 205 Issue C Level 3 Demolition Plan
- DA 206 Issue B Roof Demolition Plan
- DA 207 Issue D Level 1 Floor Plan
- DA 208 Issue D Level 2 Floor Plan
- DA 209 Issue D Level 3 Floor Plan
- DA 210 Issue D Roof Plan
- DA 211 Issue D South East and North East Elevation
- DA 212 Issue D North West and South West Elevation
- DA 213 Issue D Section AA and BB
- DA 214 Issue D Section CC and DD
- DA 215 Issue D Detailed Section AA
- DA 216 Issue B Shadow Diagrams 9AM
- DA 217 Issue B Shadow Diagrams 12PM
- DA 218 Issue B Shadow Diagrams 3PM
- DA 219 Issue C GFA Plans & Schedule
- DA 220 Issue A Staging Plan

NewScape Landscape Drawings

- L-00 Cover Sheet

- L-01 Demolition Plan
- L-02 General Arrangement Plan
- L-03 Planting Plan
- L-04 Planting Schedule
- L-05 Materials Palette
- L-06 Landscape Sections Sheet 1 of 2
- L-07 Landscape Sections Sheet 2 of 2
- L-08 Landscape Details and Specifications
- L-09 Landscape Details and Specifications

B+A Reports

- Visual & View Impact Assessment Issue B 15 November 2024

Consultant Reports

- Freshwater SLSC Noise emission assessment 15 November 2024 by GHD
- Letter in Response to RFI- Traffic Engineering Consultant Services dated 15 November by Traffix
- Loading Dock Management Plan (LDMP) dated November 2024 by Traffix

FSLSC Reports

- Draft Operational Management Plan- Freshwater SLSC Building

We also enclose additional documents relevant to the assessment of this application and referenced above as follows:

- Masterplan Freshwater Beach adopted by Council 22 May 2018
- Newscape Design Freshwater Beach Masterplan Implementation Landscape Drawings Tender issue J 230904

Please contact the undersigned if you require any further information.

Kind regards  
BONUS + ASSOCIATES

A handwritten signature in black ink, appearing to read 'Geoff Bonus', written in a cursive style.

Geoff Bonus  
Architect No 4034