

STATEMENT OF ENVIRONMENTAL EFFECTS

Minor alterations and Additions to Freshwater Surf Life Saving Club
Small Community Safety Announcement Illuminated Sign



Kooloora Avenue, Freshwater

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For Northern Beaches Council

21 December 2020

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Executive Summary

This statement has been prepared in accordance with the *Warringah Local Environmental Plan 2011* ('the WLEP') and *Warringah Development Control Plan* ('the DCP') in support of the proposed minor alterations and additions to the Freshwater Surf Life Saving Club ('SLSC'), at Kooloora Avenue, Freshwater.

The proposal comprises the replacement of the existing main entry door, construction of additions to the mezzanine floor level and new illuminated SLSC identification and instruction sign, near entrance to club driveway/beach path.

The application seeks approval for minor additions to the mezzanine level of the Club building, on the northern side. Between the original Club building and the rear wing. The proposed addition is to be used as a new Club office and meeting/training room.

A new illuminated 'Freshwater Surf Life Saving Club' sign is to be erected at the south-eastern corner of the carpark, near the pathway which leads past the side of the Club and to the beach. The sign is for building identification purposes and also to display safety/condition advice associated with the lifesaving facilities and to announce any community events associated with the Club.

The Freshwater SLSC is located within a Public Reserve and comprises a number of allotments (outlined in Section 2). The site adjoins the reserve and Freshwater beach front with direct access to the beach. The land is a Public Reserve, in the care, control and management of Northern Beaches Council and Crown Land (beachside of the Surf Club building).

The site is located at the end of Kooloora Avenue, the eastern side of Gore Street and north of the eastern end of Moore Road.

The Freshwater SLSC is a long-standing, community-based Surf Club with a significant and valued history of serving the local community officially since the early 1900's. Having regard for the social, cultural and architectural merits, the Surf Club building is heritage listed under the WLEP, Schedule 5.

The site is zoned RE1 Public Recreation under the WLEP. The building works and signage are ancillary to the existing Surf Club use. These do not significantly change the use of the building or create any significant change in scale (and are minor alterations).

The proposal is relatively minor in terms of scale and impact. The development will create minimal external change and provide improvements and public benefits in terms of promoting the on-going community use of the land and the building.

The minor proposed development involves construction within the existing building footprint, infilling an upper area. The proposal is considered consistent with the range of planning controls and objectives as detailed within this report. The minor proposal is considered consistent with the current and future intent of the occupation of the Club and meets the aims of the WLEP and the objectives of the RE1 Public Recreation zone.

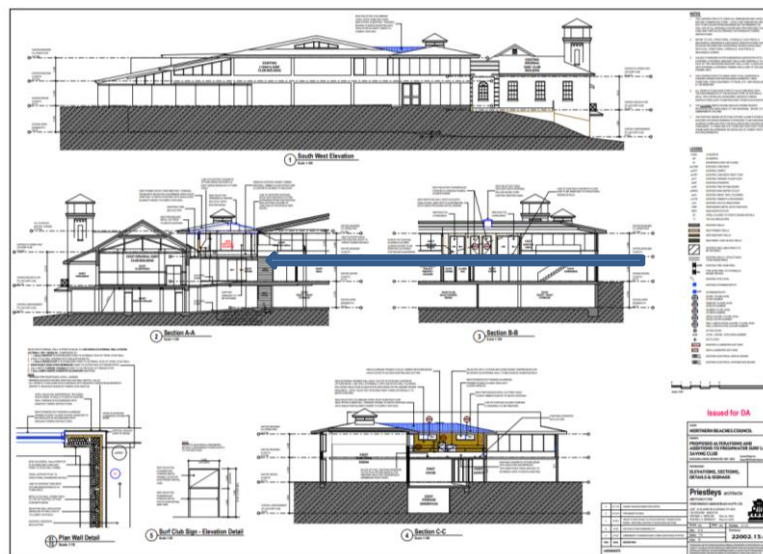
The proposal is in keeping with built form of the heritage listed Club. No vegetation removal is required in association with the proposed alterations or signage. The proposed sign is not considered to impact on the public reserve vegetation or wildlife. Given the low, infill section of the roof (between wings) and the location of the site below cascading other properties, and the physical distance away, the proposal would not unreasonably or adversely impact on views. Views, consistent scaling, improved materials, BCA updating, sustainability and heritage have all been considered in the design.

Supportive consultant reports have been provided in relation to heritage, BCA performance solution report, NCC/Section J/accessibility assessment, hydraulic services and upgrade details, quantity survey/project costing, site survey plan, schedule of materials, signage details on plan, waste management plan, architectural plans, perspective drawings. These are included in the Development Application submission.

1. Description of the proposal

Proposed Alterations/Alterations Works:

- Construction of new meeting room at the mezzanine level.
- This proposed additional area is located within a roof top void area as detailed below.
- The proposed infill section is shown in the following extract and is compared with the original 1986 plans taken from the HIS by Edwards Heritage Consultants, 2020.



Priestleys Architects, Proposed Plans, November 2020

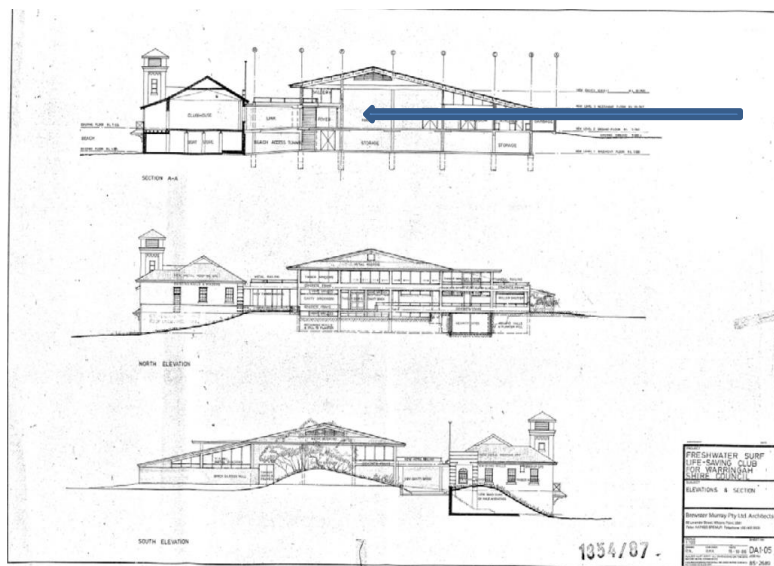


Figure 39: Plan showing the proposed additions to the Freshwater SLSC in 1987.
Source: Northern Beaches Council

1980s Previous Renovation Plan Extract, from Edward Heritage Consultants - HIS



Priestleys Architects, NE Perspective

- Minor internal alterations to the floor plans (built-in cupboards, partition walls, minor refurbishment, new glazed building entry).
- Erection of new illuminated sign – Freshwater Surf Life Saving Club/Noticeboard style, at the footpath to the front of the SLSC, near the walkway towards the beach (as shown with an arrow in the following site plan extract).



Priestleys Architects, Site Plan- Sign

- The proposed sign is an illuminated sign of approximately 1m height and 1.6m width (illuminated signboard element) mounted on powdercoated metal posts. The sign is proposed to be 1.5m above ground level (to be readily visible/eye level). This will be fixed to the ground via concrete footings.
- The purpose of the proposed sign is to identify the building/Club, display community and lifesaving safety announcements. The content of the sign is directly associated with the community and safety functions of the lifesaving service/Club. The sign is therefore non-commercial in nature.

Materials:


- All materials to match the existing surf club and have been guided by the project architect in consultation with Council project management staff and the independent Heritage Consultant.

- These are detailed in the following extracts from the Materials Schedule:

External Materials and Finishes Schedule

DA Issue

Alterations and Additions to existing Freshwater Surf Life Saving Club at **Kooloora Avenue, Freshwater** for Northern Beaches Council

Area / Item	Description of Material / Finish / Colour	Material / Finish / Colour
EXTERNAL WALLS New external walls to new Office & Meeting / Training Room.	New fibre cement wall sheeting fixed to wall frame with selected waterproof textured paint finish to match colour and texture of existing wall finish on the existing Original Surf Club Building and part of the existing 1990's Surf Club Building.	



Priestleys Architects

Job No: 22002
Date: 27 November 2020

External Materials and Finishes Schedule

DA Issue

Alterations and Additions to existing Freshwater Surf Life Saving Club at **Kooloora Avenue, Freshwater** for Northern Beaches Council

Area / Item	Description of Material / Finish / Colour	Material / Finish / Colour
WINDOWS New windows installed to the north and east walls of the new Office & Meeting / Training Room.	New powdercoat finished aluminium framed sliding windows to match colour of existing windows and glazed sliding doors which are to be removed from the existing Terrace.	
FASCIA'S, GUTTERS & DOWNPIPES New fascia's and gutters fixed to new roof framing where shown. New downpipes installed where shown.	New timber fascia's fixed to new timber framed roof. New selected colorbond steel roof eaves gutters fixed to fascia's. New PVC downpipes installed to new gutters, to be painted to match existing. New fascia's, gutters and downpipes to match colour and profile of existing.	

Job No: 22002

External Materials and Finishes Schedule

DA Issue

Alterations and Additions to existing Freshwater Surf Life Saving Club at **Kooloora Avenue, Freshwater** for Northern Beaches Council

Area / Item	Description of Material / Finish / Colour	Material / Finish / Colour
ROOFING New steel roof sheeting installed above new Office & Meeting / Training Room.	New colorbond steel roof sheeting of a profile and colour to match existing above the existing Function Room.	
SKYLIGHTS New skylights located above existing Meeting Area and new Meeting / Training Room	New prefinished double glazed skylights equal to VELUX Skylights. Colour to match new roof sheeting colour.	

Priestleys Architects

Job No: 22002
Date: 27 November 2020

Priestleys Architects, Materials Schedule

2. Planning Controls

Statutory Controls

The relevant Statutory Planning Controls include: -

- Environmental Planning and Assessment Act, 1979 (Section 4.15) - Evaluation
- State Environmental Planning Policy No. 55 – Remediation of Land and Draft SEPP
- State Environmental Planning Policy No. 64 (Advertising and Signage)
- State Environmental Planning Policy (Vegetation in Non-Rural Areas)
- State Environmental Planning Policy (Coastal Management) 2018
- Draft State Environment Planning Policy (Environment)
- Warringah Local Environmental Plan 2011

Policy Controls

The applicable policy control documents are: -

- Warringah Development Control Plan 2011

3. Description of the site and surrounding area

The Freshwater SLSC is located at the eastern end of Kooloora Avenue, between Kooloora Avenue and Moore Road.

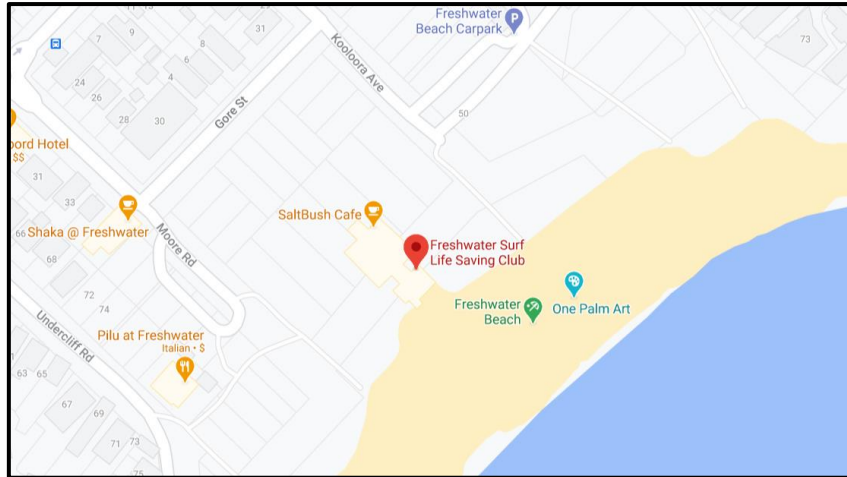
The SLSC building and location is situated within a public recreational reserve that is comprised of open grassed areas bound by Kooloora Avenue, Gore Street and Moore Road and Freshwater Beach to the east.

The Club site adjoins Freshwater Beach as well the adjoining public recreation reserve and is understood to comprise eighteen (18) allotments, legally described as:

- Lots 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, Section 3, DP 7022;
- Lots 20, 21, 22, 23 and 24, Section 2, DP 975183;
- Lot 2797 DP 820312; and
- Lot 1 DP 909023.

Freshwater SLSC is located over multiple allotments, and the site more specifically involves the following allotments:

- Lots 21 & 22, Section 2, DP 975183;
- Lot 2797 DP 820312;
- Lot 1 DP 909023.



Map: Location of the subject site (google maps)



Aerial Map: of the subject site (showing location of proposed works (red star) and sign (blue star) (google maps)

Freshwater Beach shown and the public reserve/recreation area directly behind the Club building, public car parks and surrounding residential uses also shown



Freshwater SLSC Building – view from the beach



Freshwater SLSC, showing location of proposed building works

The Heritage Impact Statement ('HIS'), prepared by Edwards Heritage Consultants, dated December 2020, describes the Freshwater Surf Club as:

'Known as the Freshwater Surf Life Saving Club, the building is defined by two distinct phases: the original 1934 building which sits at the eastern beach-side, and the c1987 additions which sit at the western side fronting the adjoining public reserve.

The original 1934 building is a two-storey structure, of masonry construction with rendered external walls. The building originally had its primary elevation facing the rear, which was later obscured by the attachment of the c1987 additions. It also has a strong visual relationship to the beach side, which now reads as the more prominent elevation and public 'face' of the building.

.....The rear additions constructed in c1987, have a distinctly contrasting architectural form and language. They are of two-storeys in height, with a low-pitched roof that comprises large roof planes that span the footprint of the

building, with corrugated sheet metal cladding and sporting a central roof lantern that acts as an internal lightwell and mimics the language of the observation tower. The main structure is of formed concrete, with brick infill to ground floor walls and large glazing panels to the first floor. A narrow- throated pavilion links the large scaled additions to the rear elevation of the original 1934 building.'

The HIS includes a detailed written and pictorial history of the area, the commencement of the Freshwater SLSC, establishment of this location in area for community use and the evolution of the Surf Club historic and current buildings.

4. Consideration

A summary of the compliance of the proposal with the relevant planning controls is provided below:

Environmental Planning and Assessment Act, 1979 – Section 4.15

4.15 Evaluation

(1) Matters for consideration—general In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application:

(a) the provisions of:

(i) any environmental planning instrument, and

(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and

(iii) any development control plan, and

(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and

(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph), and
(v) any coastal zone management plan (within the meaning of the Coastal Protection Act 1979), that apply to the land to which the development application relates,

(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,

(c) the suitability of the site for the development,

(d) any submissions made in accordance with this Act or the regulations,

(e) the public interest.

(2) Compliance with non-discretionary development standards—development other than complying development If an environmental planning instrument or a regulation contains non-discretionary development standards and development, not being complying development, the subject of a development application complies with those standards, the consent authority:

(a) is not entitled to take those standards into further consideration in determining the development application, and

(b) must not refuse the application on the ground that the development does not comply with those standards, and

(c) must not impose a condition of consent that has the same, or substantially the same, effect as those standards but is more onerous than those standards,

and the discretion of the consent authority under this section and section 4.16 is limited accordingly.

(3) If an environmental planning instrument or a regulation contains non-discretionary development standards and development the subject of a development application does not comply with those standards:

(a) subsection (2) does not apply and the discretion of the consent authority under this section and section 4.16 is not limited as referred to in that subsection, and

(b) a provision of an environmental planning instrument that allows flexibility in the application of a development standard may be applied to the non-discretionary development standard.

Note.

The application of non-discretionary development standards to complying development is dealt with in section 4.28 (3) and (4).

(3A) Development control plans If a development control plan contains provisions that relate to the development that is the subject of a development application, the consent authority:

(a) if those provisions set standards with respect to an aspect of the development and the development application complies with those standards—is not to require more onerous standards with respect to that aspect of the development, and

(b) if those provisions set standards with respect to an aspect of the development and the development application does not comply with those standards—is to be flexible in applying those provisions and allow reasonable alternative solutions that achieve the objects of those standards for dealing with that aspect of the development, and

(c) may consider those provisions only in connection with the assessment of that development application.

In this subsection, standards include performance criteria.

(4) Consent where an accreditation is in force A consent authority must not refuse to grant consent to development on the ground that any building product or system relating to the development does not comply with a requirement of the Building Code of Australia if the building product or system is accredited in respect of that requirement in accordance with the regulations.

(5) A consent authority and an employee of a consent authority do not incur any liability as a consequence of acting in accordance with subsection (4).

(6) Definitions In this section:

(a) reference to development extends to include a reference to the building, work, use or land proposed to be erected, carried out, undertaken or subdivided, respectively, pursuant to the grant of consent to a development application, and

(b) non-discretionary development standards means development standards that are identified in an environmental planning instrument or a regulation as non-discretionary development standards.

The proposal is consistent with relevant State and local planning policies and zoning objectives.

The proposal complies with LEP development standards DCP merit guidelines. The proposal is reasonable, not detrimental and the merits have been justified within this report.

The proposal represents the orderly development of land, is sustainable and the site is suitable to support the proposal. The development therefore satisfies Section 4.15 of the Act.

SEPP and Draft SEPP Remediation of Land

The proposed building works are minor and located within the building envelope of the existing Club building. The excavation works for the sign is also minor. Given the longstanding nature of the use of this site and minimal site alteration involved, no further investigation is considered warranted.

State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017

The aims of this Policy are: to protect the biodiversity values of trees and other vegetation in non-rural areas of the State, and (b) to preserve the amenity of non-rural areas of the State through the preservation of trees and other vegetation and to protect the biodiversity values of trees and other vegetation and the amenity of the area through the preservation of the vegetation.

The proposal does not involve the clearing of native vegetation within the front dune area.

Minimal external work is proposed, including a small sign which would not create the need for vegetation alteration. This is located within an altered area.

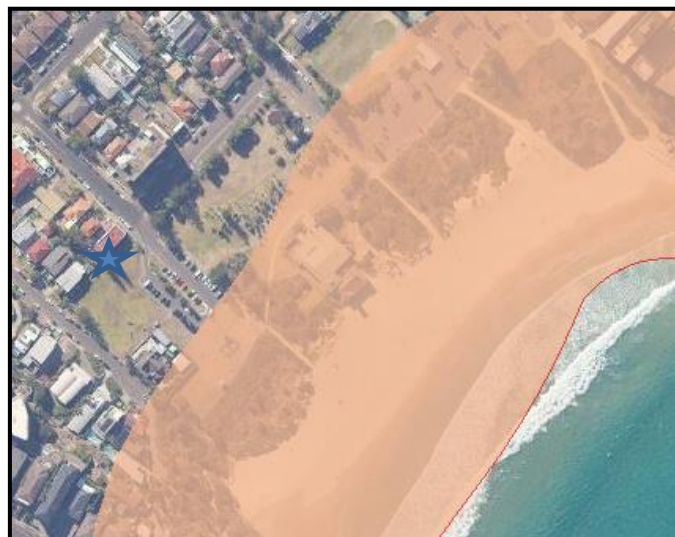
The proposal does not impact on any existing biodiversity, trees or vegetation on the site and is considered supportable within the context of the SEPP and environmental provisions.

State Environmental Planning Policy 'SEPP' (Coastal Management) 2018

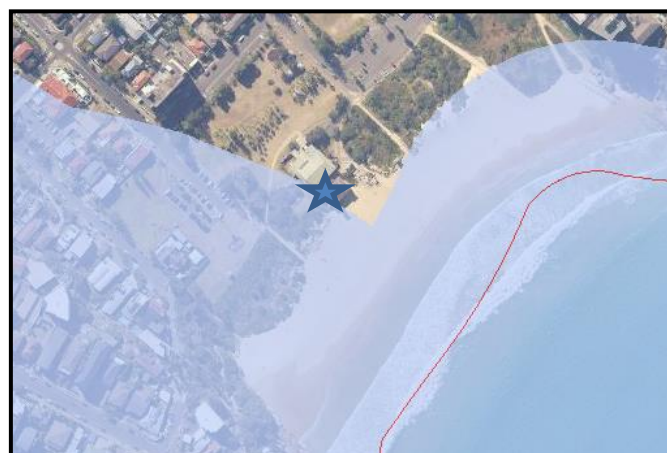
The aims of the Coastal Management SEPP include managing development in the coastal zone and protecting the environmental assets of the coast, establishing a framework for land use planning to guide decision-making in the coastal zone and mapping the 4 coastal management areas that comprise the NSW coastal zone for the purpose of the definitions in the *Coastal Management Act 2016*.

The SEPP allocates importance in evaluation of development in relation to social, economic and environmental interests and classifies involved coastal land into distinct coastal management areas, to facilitate effective management and to provide overarching coastal management and protections across different local government areas.

The site is located within the area mapped as the *coastal zone*. It is mapped as within the *Coastal Use Area Map* (below). The site of the proposed works and sign are outside of the *Coastal Environment Area*, as follows:



Extract of Coastal Area Map



Extract of Coastal Environment Area Map

Division 4 Coastal use area

Clause 14 Development on land within the coastal use area

- (1) *Development consent must not be granted to development on land that is within the coastal use area unless the consent authority—*
- (a) has considered whether the proposed development is likely to cause an adverse impact on the following—*
 - (i) existing, safe access to and along the foreshore, beach, headland or rock platform for members of the public, including persons with a disability,*
 - (ii) overshadowing, wind funnelling and the loss of views from public places to foreshores,*
 - (iii) the visual amenity and scenic qualities of the coast, including coastal headlands,*
 - (iv) Aboriginal cultural heritage, practices and places,*
 - (v) cultural and built environment heritage, and*
 - (b) is satisfied that—*
 - (i) the development is designed, sited and will be managed to avoid an adverse impact referred to in paragraph (a), or*
 - (ii) if that impact cannot be reasonably avoided—the development is designed, sited and will be managed to minimise that impact, or*
 - (iii) if that impact cannot be minimised—the development will be managed to mitigate that impact, and*
 - (c) has taken into account the surrounding coastal and built environment, and the bulk, scale and size of the proposed development.*
- (2) *This clause does not apply to land within the Foreshores and Waterways Area within the meaning of Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005.*

Having regard for the minor nature of the work, which is essentially internal to the existing SLSC building footprint (plus the minor/small external sign), the proposal is not considered likely to impact on the access to or from the foreshore, beach or other parts of the public reserve area. The size, bulk and scale of the infill section of the upper floor, and small section of matching roof profile between existing roof sections is considered acceptable and not impacting.

The proposed work is not considered to impact any part of the foreshore via shadows, wind funnelling or loss of views, will not impact on the visual amenity of any part of the foreshore and impact on the heritage significance of the Freshwater SLSC building or surrounds as detailed in the LEP/DCP tables and the heritage assessment/HIS.

It is considered that Council can be satisfied that the proposal is acceptable within the foreshore setting of Freshwater Beach and the adjoining public reserve. There are no requirements for any mitigation measures associated with the subject proposal.

Division 5 General

Clause 15 Development in coastal zone generally—development not to increase risk of coastal hazards

Development consent must not be granted to development on land within the coastal zone unless the consent authority is satisfied that the proposed development is not likely to cause increased risk of coastal hazards on that land or other land.

The proposed building works are located wholly within the existing building envelope of the existing SLSC building. There is not considered to be any likely increase in coastal hazards as a result of the works.

The sign is a minor structure only – located outside of the frontal dune area of the beach and near the public footpath and grassed reserve area. This is therefore well separated from the beach area and not considered to create any coastal hazard.

State Environmental Planning Policy 64 – Advertising and Signage

This policy applies to all land and structures with NSW and all vessels on navigable waters.

This application seeks approval for the erection of an illuminated sign for the Freshwater SLSC. The details of the safety/identification sign are contained in Section 2 of this Statement.

SEPP 64 Criteria	Comment	Complies
<p>Clause 3 is relevant to the assessment of signage and states:</p> <p>Part 2 Signage generally 8 Granting of consent to signage <i>A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied:</i> <i>(a) that the signage is consistent with the objectives of this Policy as set out in clause 3 (1) (a), and</i> <i>(b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 1.</i> <i>(1) This Policy aims:</i> <i>(a) to ensure that signage (including advertising):</i> <i>(i) is compatible with the desired amenity and visual character of an area, and</i> <i>(ii) provides effective communication in suitable locations, and</i> <i>(iii) is of high quality design and finish, and</i> <i>(b) to regulate signage (but not content) under Part 4 of the Act, and</i> <i>(c) to provide time-limited consents for the display of certain advertisements, and</i> <i>(d) to regulate the display of advertisements in transport corridors, and</i> <i>(e) to ensure that public benefits may be derived from advertising in and adjacent to transport corridors.</i> <i>(2) This Policy does not regulate the content of signage and does not require consent for a change in the content of signage.</i></p>	<p>Minor building identification/safety indicator signage,</p> <p>Directly associated with and ancillary to the Club.</p> <p>The signage is minor, not detrimental and is appropriate and not dominant.</p> <p>The signage is consistent with the provisions of the SEPP</p>	✓
Schedule 1 Criteria		
1.Character of the area		
<p>• Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?</p>	<p>The signage is minor in size and scale and is for building/safety-service identification. Messaging is connected with the community use of the site (similar to school ID/messaging signage). This is considered reasonable in the open</p>	✓

	<p>space context and in the context of the safety and community services provided by the SLS Club. The sign is not at a scale which would interfere with the area, the landscaping, residential amenity or heritage.</p> <p>The proposed illumination is to be for modest community/safety messaging, at a low illumination level with LED lighting.</p>	
<ul style="list-style-type: none"> • Is the proposal consistent with a particular theme for outdoor advertising in the area or locality? 	<p>As noted above, the proposed sign is reasonable having regard for the safety and community role. The sign is similar in nature to school or emergency services type indicator sign boards. It is generally to be used by the lifesaving department to detail safety issues, conditions and any training activities or community benefits such as surf carnivals etc. This is reasonable having regard for the community benefits of the site and the role the site plays in the community. The scale or lighting is not considered to be excessive or unreasonable.</p>	✓
2.Special areas		
<ul style="list-style-type: none"> • Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas? 	<p>The proposal is located at a reasonable height, behind some modest landscaping and is not in a position where it would adversely impact on the Freshwater Beach area, the Club building or the reserve. The proposal is therefore consistent with this objective.</p>	✓
3.Views and vistas		
<ul style="list-style-type: none"> • Does the proposal obscure or compromise important views? 	<p>As noted above and below, the height, location and size have been considered, and the proposed sign is not in a position which would interrupt important or ocean views.</p>	✓
<ul style="list-style-type: none"> • Does the proposal dominate the skyline and reduce the quality of vistas? 	<p>The proposal is not high and is not considered to interrupt the skyline or vistas.</p>	✓

• Does the proposal respect the viewing rights of other advertisers?	The proposed sign is well-away from any other advertisers and this area is for community and not commercial uses. The sign is for community use and would not compete visually with other signs.	✓
4.Streetscape, setting or landscape		
• Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	As detailed, the sign is modest in scale and size and would not be inappropriate for the streetscape, setting or context. The proposal is consistent with the SEPP objectives.	✓
• Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	The sign is reasonable and will add to the community service activities and safety. This is considered to be a compelling merit for the placement of the proposed sign for the Freshwater SLSC.	✓
• Does the proposal reduce clutter by rationalising and simplifying existing advertising?	Clutter would not result as discussed. Refer below.	✓
• Does the proposal screen unsightliness?	Not considered unsightly due to small size, location, and site specific SLS content.	✓
• Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	No.	✓
5.Site and building		
• Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?	The proportion is compatible for the site and purpose as detailed within this table.	✓
• Does the proposal respect important features of the site or building, or both?	The proposed sign is well separated and respects the building and features. The sign does not obstruct view given the location and modesty.	✓
• Does the proposal show innovation and imagination in its relationship to the site or building, or both?	Reasonable innovation. Suitable sign for the purpose as detailed within this table.	✓
6.Associated devices and logos with advertisements and advertising structures		
• Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?	The SLSC logo would only be associated with the Club and would be reasonable in the subject context.	✓
7.Illumination		
• Would illumination result in unacceptable glare?	The size and type of the sign is not considered to	✓

	result in unreasonable glare. Refer discussion below.	
• Would illumination affect safety for pedestrians, vehicles or aircraft?	The signage would not impact safety as detailed below.	✓
• Would illumination detract from the amenity of any residence or other form of accommodation?	The signage is not considered to result in detracting light spill given the separation away from homes and the size. Furthermore, light issues are able to be managed by conditions/time switch (if required) as part of the planning and environmental assessment.	✓
• Can the intensity of the illumination be adjusted, if necessary?	Yes, low level LED.	✓
• Is the illumination subject to a curfew?	Could be conditioned if warranted.	✓
8.Safety		
• Would the proposal reduce the safety for any public road?	The sign is not on a roadway and is off the pathway and not considered to present a hazard as it will be clearly visible	✓
• Would the proposal reduce the safety for pedestrians or bicyclists?	The sign is not on a roadway and is off the pathway and not considered to present a hazard as it will be clearly visible.	✓
• Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?	The sign is modest, within the reserve and next to the path. It is located such as not to reduce safety. It is visible and would not obstruct.	✓

Draft Environment State Environmental Planning

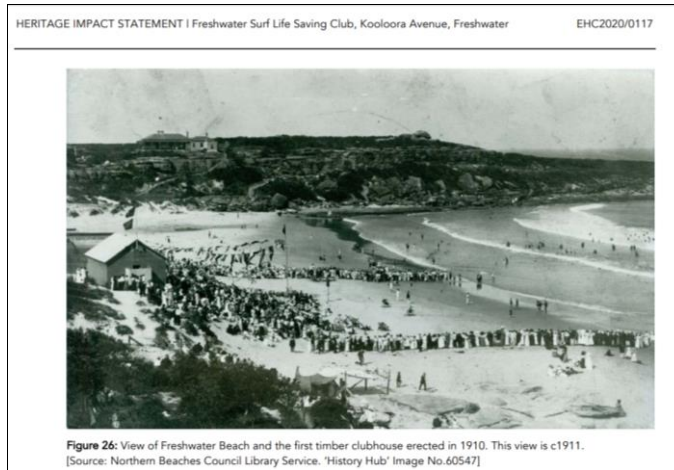
The provisions and considerations of the Draft SEPP are not considered relevant to the site. The proposal is consistent with the Coastal Management SEPP and the minor alterations do not seek removal of vegetation.

Warringah Local Environmental Plan 2011 (WLEP 2011)

Zoning and Permissibility

The subject site/Freshwater SLSC building has been in use for this purpose since 1910.

According to the research contained in the Edwards Consulting HIS, the original Clubhouse was built 1910, as a 4m x 6m timber building used for community meetings for lifesaving/community purposes.

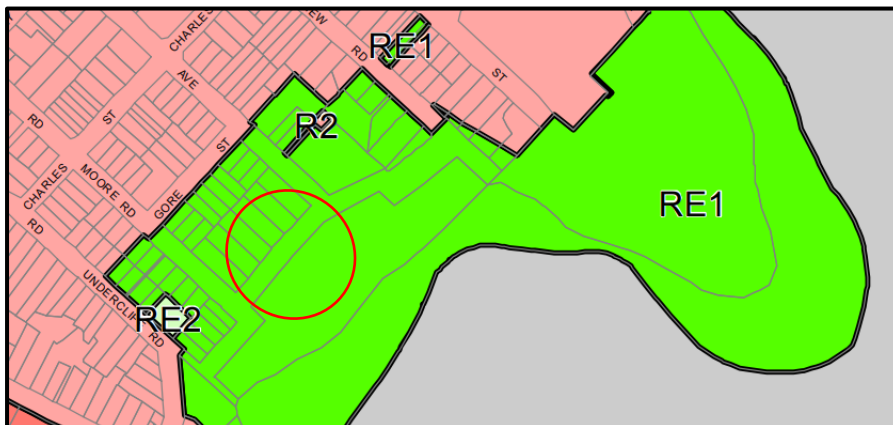


*Original photography of the Club building and use in 1910
From the Edwards Heritage Consultants HIS - Freshwater SLSC Alterations 2020*

The original Club building was damaged as a result of the impact of rough seas. In 1917 a new building was constructed.

In 1934 a much larger Club building was constructed (the primary form of the current Club building) in the Inter-War Mediterranean style. This original section of the current building is referenced as a component of the local heritage listing of the Freshwater SLSC (discussed under 'Heritage' below).

The site of the Club and the directly surrounding area is zoned as RE1 Public Recreation under the WLEP 2011 as detailed in the following zoning map extract, with the site of the building circled in red.



Zoning Extract, WLEP 2011

Zone RE1 Public Recreation

1 Objectives of zone

- To enable land to be used for public open space or recreational purposes.
- To provide a range of recreational settings and activities and compatible land uses.
- To protect and enhance the natural environment for recreational purposes.
- To protect, manage and restore public land that is of ecological, scientific, cultural or aesthetic value.
- To prevent development that could destroy, damage or otherwise have an adverse effect on those values.

2 Permitted without consent

Environmental facilities; Environmental protection works; Roads

3 Permitted with consent

Aquaculture; Boat building and repair facilities; Boat sheds; Building identification signs; Business identification signs; Car parks; Centre-based child care facilities; **Community facilities**; Emergency services facilities; **Kiosks**; **Recreation areas**; **Recreation facilities (indoor)**; Recreation facilities (major); Recreation facilities (outdoor); Respite day care centres; Restaurants or cafes; Water recreation structures

4 Prohibited

Any development not specified in item 2 or 3.

The proposal is consistent with the objectives. The proposed alterations maintain on-going public benefits and support the community use. The development would not damage ecological, scientific, cultural or aesthetic value, as detailed within this assessment.

The Surf Life Saving Club use of the site has various elements which are ancillary to the primary community facility use.

This SLSC use provides a building and meeting/management place for the purposes of the Freshwater SLS Club. This can include: training, meetings/administration/management of the Club, provision of community safety services (lifesaving service), providing community information in terms of safety and cultural history, facilitating storage of equipment for use at the beach by the Club members for public safety, and providing ancillary supportive social and refreshment/gathering/meeting and fitness spaces (directly associated with the SLS Club).

The key function of the Club is considered a community meeting space, by a group of people who are motivated to support the local community, as a service, and who are trained for the purposes of providing the beach surveillance, watching swimmers/beach activities. Assisting with the protection of life at the beach.

As part of this, the Club provides a range of smaller subordinate and supportive uses to this within the building (such as the gym, function, amenities, internal historical display/interpretation area and kiosk). Also, the boatshed and direct activity interface between the beach side section with Freshwater Beach.

It is considered that the primary and these ancillary uses can be characterised as the following permissible uses:

community facility means a building or place—

(a) owned or controlled by a public authority or non-profit community organisation, and
(b) used for the physical, social, cultural or intellectual development or welfare of the community,

but does not include an educational establishment, hospital, retail premises, place of public worship or residential accommodation.

kiosk means premises that are used for the purposes of selling food, light refreshments and other small convenience items such as newspapers, films and the like.

recreation area means a place used for outdoor recreation that is normally open to the public, and includes—

(a) a children's playground, or

(b) an area used for community sporting activities, or
(c) a public park, reserve or garden or the like,
and any ancillary buildings, but does not include a recreation facility (indoor), recreation facility (major) or recreation facility (outdoor).

There are considered to be elements of indoor and outdoor recreation related uses which support the members.

As described above, the existing use is defined as community facility with elements of indoor and outdoor recreation use (surf club activities and training and indoor gymnasium for members). Also, small supportive ancillary elements directly servicing the Club members including a canteen/kitchen/bar use, various room types associated with the Club (bedroom, office, storage) and a function area and external patios.

As highlighted in the zoning table extract, these range of uses are permissible. Most of these ancillary uses have been created over time, including with the room and use layout of spaces approved as part of the 1980s additions.

The primary lifesaving use and basis of the Club was established in the early 20 Century and the uses are also consistent with the current zoning allowances for the RE1 zone, with development consent.

In relation to the proposed works, the minor alterations involving the conversion of an existing internal area to create a mezzanine space to function as an additional Club office, meeting and training area for the benefit of the Freshwater Surf Life Saving Club are consistent with the current/historical community use. This does not significantly change the current use and is consistent with zoning provisions and objectives.

Context, Relevant Local/Civic History and Heritage

As noted above, the Freshwater SLSC has been in operation on the site for many years and the existing Freshwater SLSC building is listed as I66 in the WLEP as a local heritage item, being referred in Schedule 5 of the LEP as:

Freshwater Freshwater Surf Life Saving Club Freshwater Beach Lot 7140, DP 1032133 and Lot 2797, DP 820312, as shown on [Heritage Map](#)

The site is considered to have cultural and social importance as well as architectural significance.

The NSW Heritage Database summarises the significance as:

'A building of strong social significance which continued on from earlier clubhouses in this location. Historically, evidence of the development of popular beach culture in the inter-war years. Good example of inter-war Mediterranean style of architecture.'

The building is noted to have been designed by a Club member, Lindsay Scott and opened on 8 September 1935. There is also a cultural connection in relation to the evolution of popular board surfing and connection with champion swimmer Duke Kahanamoku, originally from Hawaii, who fashioned a timber surfboard and ran training sessions from the original Club building.

The NSW Database also includes the following additional local items which display the history of Freshwater and Harbord as a popular beach side village.


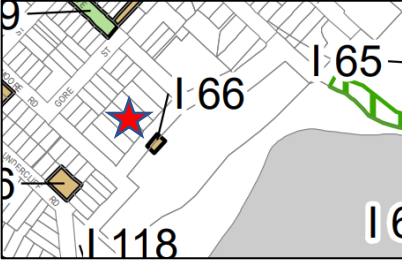
Item name ^	Address	Suburb	LGA	Information source
"Freshwater" Restaurant	80 Undercliff Road	Freshwater	Northern Beaches	LGOV
Building known as "Early Childhood Health Centre"	29 Lawrence Street	Freshwater	Northern Beaches	LGOV
Building known as "Harbord Literary Institute"	Corner Lawrence Street and Oliver Street	Freshwater	Northern Beaches	LGOV
Duke Kahanamoku Statue and Memorial Park	77 Evans Street	Freshwater	Northern Beaches	LGOV
Freshwater Rock Pool	Freshwater Beach	Freshwater	Northern Beaches	LGOV
Freshwater Surf Life Saving Club	Freshwater Beach	Freshwater	Northern Beaches	LGOV
Harbord Beach Hotel	29 Moore Road (corner Charles Street)	Freshwater	Northern Beaches	LGOV
Harbord Public School	Corner Wyadra Road and Oliver Street	Freshwater	Northern Beaches	LGOV
Harbord Public School - Building B00Q	95 Oliver Street	Freshwater	Northern Beaches	SGOV
Harbord Uniting Church	65 Albert Street (corner Oceanview Road)	Freshwater	Northern Beaches	LGOV
House	35 Marlborough Avenue	Freshwater	Northern Beaches	LGOV
House known as "Felicita"	46 Kooloora Avenue	Freshwater	Northern Beaches	LGOV
House known as "Melrose"	56 Harbord Road	Freshwater	Northern Beaches	LGOV
Jacka Park Memorial Garden	Corner Wyndora Avenue and Oliver Street	Freshwater	Northern Beaches	LGOV
Street trees	Kooloora Avenue	Freshwater	Northern Beaches	LGOV
Street trees	Wyuna Avenue	Freshwater	Northern	LGOV

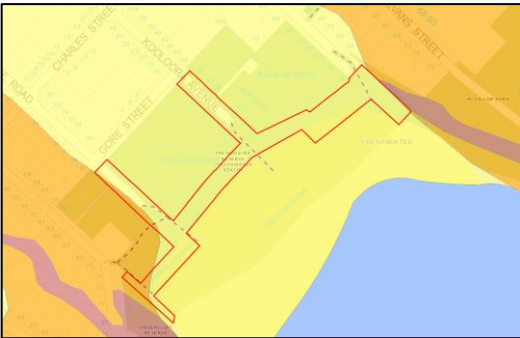
Heritage is further assessed within the following LEP and DCP compliance tables and the HIS.

The Club building is located within the direct context of the beach and community areas (reserve/park and car parking).

The broader context is predominately residential, with a mixture of residential typologies from dwellings to walk-up scale apartment buildings within a landscaped context. There are some commercial uses which are essentially concentrated within the Freshwater Village, walking distance away.

The site is in a topographical 'dip', down at the beach, the surrounding areas tend to cascade gradually further up hill. There is considerable spatial separation between the uses.

WLEP Provision	Proposal
<p>4.3 Height of Building</p> 	<p>The site is mapped white. The HOB standard has not been adopted for this site.</p> <p>The height of the existing building does not change (2 storeys).</p> <p>The addition is a small infill/mezzanine level which is currently a roof terrace.</p> <p>The small infill roof profile matches in with the existing roofing and adopts the same profile as the existing roof. Being between 2 existing wings of roof, and taking the same if not slightly lower profile, the minor addition therefore does not change the overall height or scale of the existing building.</p>
<p>4.4 Floor Space Ratio:</p>	<p>Not adopted by the LEP for this site.</p>
<p>5.10 Heritage Conservation:</p>  <p>Freshwater Surf Life Saving Club</p> <p>Freshwater Beach</p> <p>Lot 7140, DP 1032133 and Lot 2797, DP 820312, as shown on Heritage Map</p>	<p>As noted, the subject lot is listed as Item 66 in Schedule 5 of the WLEP.</p> <p>The site is not located in an HCA or in the vicinity of any locally listed heritage item that would be impacted by the proposed works (having regard for the physical separation around the building).</p> <p>The detailed and researched HIS prepared by Edwards Heritage Consultants (December 2020) provides a written and pictorial historical review of the site, it's long standing social significance and the remnant buildings which will not be considerably altered.</p> <p>The HIS re-assesses the heritage values of the property and summarises that the Freshwater Surf SLSC is of historical, association, aesthetic, social, and representative significance at a local level.</p> <p>Upon a comprehensive assessment of the proposal in relation to the built and cultural heritage of the site, the proposal was considered acceptable.</p> <p>The proposed building infill section is to the more contemporary section of the building (constructed in the late 1980s). It is a low profile use of an existing roof top space which will not be clearly perceptible and is not considered to interrupt the built heritage elements.</p> <p>The HIS concludes that the proposal will <i>'not result in any material affectation to significant heritage fabric and the additions are of a scale, form, language and materiality that will 'sit quietly' against the building and within the existing overall silhouette of the 1987 additions, without visually dominating the heritage item and thus retaining visual prominence of the 1934 Freshwater SLSC building'</i>.</p>

	<p>The proposal is well considered, modest and architecturally design under the guidance of a heritage expert to be acceptable, subject to the recommendations contained in Section 11 of the HIS.</p> <p>Some recommendations within then HIS relate to the preservation of any monuments or plaques that could potentially be impacted by the building works and can be adopted by condition.</p> <p>The proposed minor works are assessed as respectful of heritage and consistent with Clause 5.10 of the LEP.</p>
<p>6.1 Acid Sulfate Soils</p>	<p>The site is partially mapped as Class 5 ASS. The site of the proposed works is outside the mapped area. No requirements for the proposed building works.</p>
<p>6.2 Earthworks</p>	<p>Earthworks are not part of the development application (negligible change for the signage footings). Not considered to be a concern given the scope. Consistent with the objectives of Clause 6.2.</p>
<p>6.3 Flooding</p>	<p>The site is not considered to be flood prone and the development would not create any issues in terms of flood consideration or levels having regard for the scope.</p>
<p>6.4 Development on sloping land</p>  <p>Warringah Landslip Risk Map</p> <ul style="list-style-type: none"> Area A- Slope less than 5 degrees Area B - Flanking Slopes from 5 to 25 degrees Area C - Slopes more than 25 degrees Area D - Collaroy Plateau Area Flanking Slopes 5 to 15 degrees Area E - Collaroy Plateau Area Slopes more than 15 degrees 	<p>The site is located within Area A – less than 5 degrees.</p> <p>There are no specific requirements for the proposed works. No concern in relation to landslip or slope having regard for the minor scope.</p> <p>As noted in the details, the additions are concentrated to areas of the existing constructed building, as infill to the upper level (aside from minor internal updates).</p> <p>The proposed singular sign, which is located further toward the public reserve and roadway is minor.</p>
<p>6.5 Coastline Hazards</p>	<p>Refer to the above comments and the comments on Coastal Management.</p> <p>The additions relate to the existing building footprint and infill and minor signage.</p> <p>The proposal is not considered to implicate coastal hazards.</p>

Warringah Development Control Plan (WDCP)


The Warringah DCP ('WDCP') is the relevant local planning merit-based *guideline* for development in the Warringah section of the Northern Beaches LGA.

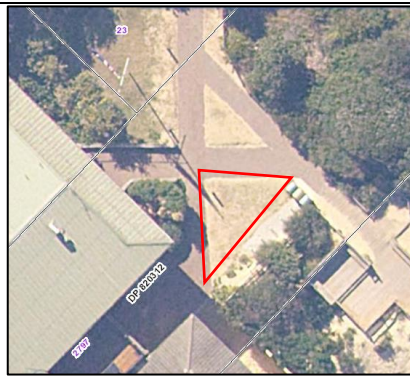
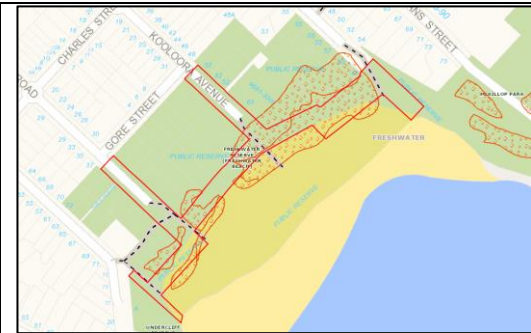
There are no specific provisions relating to the proposed building works and signage associated with the Freshwater SLSC and works within the Public Reserve.

Relevant merit guideline controls in terms of the assessment of built form and development in the area are tabled below for consideration:

CONTROL	PROPOSED
Part D Design	
D1 Landscaped Open Space and Bushland Setting	<p>There is minimal change to the existing setting of the Club building (only the small sign).</p> <p>The minor sign addition does not seek to remove landscaping as this is over a cleared/lawned area near the pathway.</p>
D2 Private Open Space	N/A
D3 Noise	<p>The surf club is not located close to any residential properties. It is separated from houses via the remainder of the public reserve.</p> <p>Standard conditions of consent can apply to noise during construction.</p>
D4 Electromagnetic Radiation	N/A
D6 Access to Sunlight	N/A
D7 Views	<p>No impact on the views of properties inland of the existing SLS Club building.</p> <p>The proposal is located within the building footprint/prevaling envelope and does not protrude above the existing building height.</p> <p>The minor additional roof profile is in between 2 existing roof wings.</p> <p>Further to this minimal roof infill, the building is very well separated from surrounding homes and buildings. It is not considered that a view analysis would be warranted given the separation, the fact that the building is in a topographical dip and given that prevailing views would still be maintained over and above the building.</p>
D8 Privacy	N/A
D9 Building Bulk	<p>The proposal does not increase the building bulk.</p> <p>As detailed in the plan extracts and discussion, the proposed addition is essentially sited within the existing building envelope (same boundaries, footprint and overall height).</p> <p>Therefore, the addition is not considered to be discernible from public vantage points.</p>
D10 Building Colours and Materials	To match the existing.

	<p>The proposed materials are durable consistent with the contemporary section of the building and assessed as appropriate in relation to the original heritage elements.</p> <p>The proposed materials are considered to be high quality and consistent with heritage and DCP provisions.</p> <p>Standard conditions can be applied in this regard as required.</p>
D11 Roofs	<p>As noted, a small infill section is proposed between the roof sections, to match the height, slightly lower and to match the existing materials to also meet current environmental and reflectivity standards.</p> <p>The roof infill section is small, consistent with the existing building style and scale and is considered to be consistent with the DCP merit objectives.</p>
D12 Glare and Reflection	<p>The materials and finishes will not cause any glare or reflection. As noted above.</p> <p>Refer to the External Materials and Finishes Schedule.</p>
D13 Front Fences and Front Walls	N/A
D14 Site Facilities	N/A
D15 Side and Rear Fences	N/A
D16 Swimming Pools and Spa Pools	N/A
D17 Tennis Courts	N/A
D18 Accessibility and Adaptability	<p>As noted on the plans and in the report, the development involves minor updates in terms of best practice accessibility and adaptability. Consistent and beneficial update for this community facility.</p> <p>Refer also to Section J and BCA Performance Report which addresses path of travel aspects which states '<i>It is deemed from the assessment carried out, the Performance Solution(s) have shown compliance with the relevant Performance Requirements of the BCA and are suitable for application into the subject building.</i>'</p> <p>This relates to acceptable compliance with the BCA and AS 1428.1-2009, also having regard for the age of some of the existing building sections.</p>
D19 Site Consolidation	N/A
D20 Safety and Security	<p>No change to the existing Club in terms of how it is managed in relation to safety and security of staff and members of the public.</p> <p>The update to the front doors is considered to have a neutral effect.</p> <p>Overall, fire and BCA safety is considered to be improved in connection with the proposed alterations and additions.</p>
D21 Provision and Location of Utility Services	<p>Electricity is available/proposed to be provided to the location of the proposed new sign at the front of the driveway.</p>

	<p>A small trench is proposed from the existing lifeguard tower to the proposed sign location. This would not alter vegetation, as the trench is to be located within the existing sand area/path.</p>
<p>D22 Conservation of Energy and Water</p>	<p>As existing for existing Club facilities.</p> <p>Hydraulics provisions and updates are proposed as detailed and the proposal is considered consistent with DCP merit provisions.</p>
<p>D23 Signs</p>	<p>A new illuminated Freshwater SLS Club sign is proposed at the corner of the driveway which leads into the Club building area and beach interface (refer to the site photographs).</p> <p>A SEPP 64 assessment is part of this Statement. This concludes that there is minimal impact and acceptable improvements in terms of the safety and community function of the Club.</p> <p>As detailed in the SEPP 64 table, the signage is considered modest and reasonable and would not create adverse impacts in terms of streetscape, context, views or amenity.</p> <p>The proposal is consistent with DCP planning provisions in this regard.</p> 
<p>Part E The Natural Environment</p>	
<p>E3 Threatened species, populations, ecological communities listed under State or Commonwealth legislation, or High Conservation Habitat</p>	<p>The proposed works are not considered to intrude on any of the area mapped as containing nature vegetation.</p> <p>This includes the area of the bin enclosure during construction. It is located on the cleared area indicated as follows:</p>



E4 Wildlife Corridors

This area is mapped as part of the Freshwater Wildlife Corridor.



The proposal is not considered to impact on the movement of wildlife across the public reserve area, as the proposed works are contained within the building envelope of the Club building, within the immediate surrounds of the building (ie. bin enclosure during construction).

The proposed sign is located at a cleared public walkway/grassed area at the entrance of the driveway and would not impact on wildlife corridors.

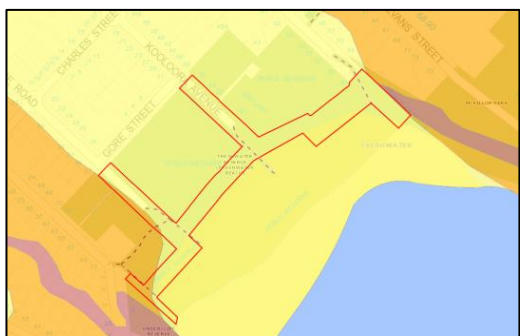
E5 Native Vegetation

The proposed works, including the erection of the new sign, will not impact on any native vegetation around the site of the SLSC as discussed.



E10 Landslip Risk

The SLSC and surrounding public reserve is mapped as a Slope of less than 5 degrees – Area A.



For Area A geotechnical report is not required, particularly given the minor scope/infill of an upper floor area and no change to the building footprint or any additional footings and earthworks for the building.

The signage footings are minor and not considered to create any issue.

As the works are minor and contained within the existing building footprint, there is no increased risk of landslip as a result of the works, over and above any risk to the existing building.

LEGEND	
<p>Warringah Landslip Risk Map</p> <ul style="list-style-type: none"> Area A - Slope less than 5 degrees Area B - Flanking Slopes from 5 to 25 degrees Area C - Slopes more than 25 degrees Area D - Collaroy Plateau Area Flanking Slopes 5 to 15 degrees Area E - Collaroy Plateau Area Slopes more than 15 degrees 	
<p>G5 Freshwater Village Freshwater Village Context</p> <p>'History</p> <p><i>Note: This historical background has been extracted from Gwen Gordon: Harbord Queenscliff and South Curl Curl 1788 – 1978 (1978)</i></p> <p><i>The following are some key milestones with regards to the history of urban settlement of Freshwater:</i></p> <p><i>In 1818 the first land grant of 50 acres was made to Thomas Bruin, and in 1884 this 50 acres of land became known as the Freshwater Estate. The land was bounded by the beach, Evans Road, Albert Street, and Undercliff Road.</i></p> <p><i>Thirty years later, Duke Kahanamoku, the world sprint swimming champion from Hawaii, introduced surfboard riding to Australia at Freshwater Beach in December 1914 spurring some interest in Freshwater.</i></p> <p><i>In the mid to late 1920s there were about six shops in Lawrence Street and by the late 1930s Lawrence Street had a Post Office, fire station, and bank agencies. The Harbord Literary Institute was the 'centre of social and cultural life' in the area.</i></p> <p><i>Freshwater became Harbord in 1923, and reverted to Freshwater in 2008. Now a relatively quiet village away from the main roads of the peninsula, Freshwater services the local community with a variety of shops, offices and businesses.'</i></p>	<p>The SLSC and surrounding public reserve is outside the Village area however the works to the Club building and the benefits to the service of the Club to the village are considered to have compelling merits for the village and the community.</p> <p>It is submitted that the updating proposal promotes the role of the Club in the community to continue the role of the Club to the strong local community life. This accords with the DCP objectives.</p> <p>As noted, the role of the Club is to be improved with this minor improvement, with the built form minimally changed and some additional safety and Club facilities able to be improved.</p>

5. Conclusion

The following merits of the proposal are put forward for Council's consideration:

- The proposal has been designed to respect the character and history of the locality and to make minor improvements to the function and safety of the Club (signage, meeting and office areas, internal renovations, fire and access safety improvements).
- The proposal allows for the protection of the original historical building and creates a historically appropriate character.
- The proposed upper floor addition does not change the bulk, height or scale of the building and creates a small infill component which is not considered to be readily perceptible from surrounding areas, the public domain, the coastline or in relation to any significant views.
- The proposed additions have been architecturally designed to retain and protect the heritage integrity of historical Club building. The new elements are modest, separated, and recessed, utilising appropriate scale and materials.
- The proposal involves minor interior improvements in a sensitive way.
- The signage is modest in site, is in a safe location and will promote community announcements and safety. This is consistent with signage planning controls, is suitably modest and not detracting.

- The proposal is commensurate with the zoning allowances and the objectives of the RE1 zone and is consistent with environmental and heritage controls, as detailed.
- The proposal is not considered to adversely impact upon surrounding residential uses, as discussed.
- The proposed development has considerable architectural and heritage merit.
- The proposed minor additions will meet the needs of the Club. The development is considered to be connected with on-going public interest improvements, in providing on-going community services for Freshwater whilst not resulting in minimal environmental or amenity impact.
- The proposed alterations and additions and signage are therefore considered consistent with relevant planning provisions and are worthy of approval.

6. Additional Photographs



The Freshwater SLSC looking from the carpark
Towards the location of the proposed sign, at the pathway and near the sculpture memorial



Showing general location of the proposed sign



View of the adjoining public reserve (Club location to the left)



Roadway, Kooloora Avenue and reserve



Duke Kahanamoku Memorial



From Kooloora Avenue, view to the SLSC from the road



Driveway to Club building and reserve



Contemporary section



Side stairs from Freshwater Beach



Beach and Club interface



Beach and Club interface/original building



side view of original and contemporary sections



Beach and Club interface/original building



Beach and Club interface/original building/side view



View of contemporary section



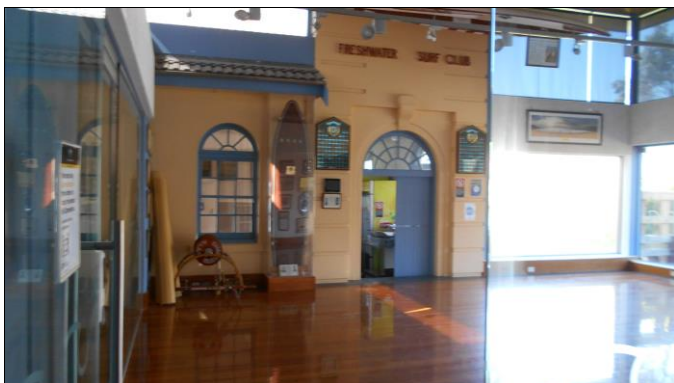
Entry doors (left)



Entry doors and infill section between original and 1980s section of the building



Club building Interiors





Exterior, rear



Surrounding reserve



Surrounding reserve



Surrounding reserve



Surrounding reserve/behind the Club