



planning consultants

21 June 2022  
Our Ref: 20323A.5AJC

Chief Executive Officer  
Northern Beaches Council  
PO Box 82  
MANLY NSW 1655

**Attn: Steve Findlay, Manager Development Assessment  
Adam Susko, Principal Planner**

Dear Steve and Adam

**RE: REQUEST FOR INFORMATION DEVELOPMENT APPLICATION NO: DA2021/2173  
ALTERATIONS AND ADDITIONS TO A SURF LIFE SAVING CLUB  
394 BARRENJOEY ROAD, NEWPORT**

DFP Planning has been engaged by Adriano Pupilli Architects (APA) on behalf of Northern Beaches Council (Council) in response to Council's Request for Information (RFI) letter dated 12 April 2022 in relation to DA2021/2173 for the proposed alterations and additions to Newport Surf Life Saving Club (Newport SLSC) at 394 Barrenjoey Road, Newport (the site).

Council's RFI letter dated 12 April 2022 identified the following matters to be addressed as part of the application:

- Heritage;
- Design and Sustainability Advisory Panel (DSAP);
- Waste Management;
- Landscape;
- Acoustic Issues;
- Temporary Facilities Arrangements;
- Views;
- Building Height; and
- Liquor License.

### **1.0 Proposed Amendments**

As the Development Application (DA) was submitted but not finally determined prior to 1 March 2022, the provisions of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation 2000) continue to apply to the DA. In accordance with the requirements of clause 55(2) of the EP&A Regulation 2000, the design of the Newport SLSC has been amended as follows:

- External / Site Works:
  - Widening of western promenade and increased width of garden to the west of the SLSC building;
  - Widening of entry pathway into the SLSC building;
  - Identification of pavement finishes and treatments;
  - Relocation of bicycle parking;
  - Reconfiguration of car park including loss of four (4) spaces, relocation of accessible parking spaces and creation of dedicated drop-off / emergency vehicle parking area
  - Provision of new landscape buffer to the north of the SLSC building with new curved 'shower courtyard';
  - New landscape planting to the north and south of the Youth Space;
- Ground Floor:
  - Dedicated bin store provided beneath the northern stairs to the training rooms;
  - Northern stairs relocated with new cascading sitting steps located at stair base;
  - Plant room relocated within SLSC storage area;
  - Glazed link provided between the existing SLSC building and the new extension;
  - Minor increase in the footprint of the SLSC storage and male public amenities;
  - Use of hit and miss brickwork to the storage area;
- First Floor:
  - Increase in footprint of first floor addition by cantilevering the floor to the north and east (increase in size of training rooms and terrace);
  - Glazed link provided between the existing SLSC building and the new extension;
  - Glazed roof above Committee Room between existing SLSC building and the new extension;
  - Vaulted gable roof with standing seam Colorbond roof above Committee Room and lounge with concealed gutters and no eaves;
  - Removal of existing false ceiling above hall and new ceiling installed to the underside of the rafters;
  - Provision of new glazed acoustic partition between the hall and Committee Room;
  - Timber battens to sliding screens (in lieu of bi-folding aluminium), roof gable end and side; and
  - Concrete membrane roof to training spaces with additional PV panels.

Amended architectural and landscape plans have been prepared by APA.

## 2.0 Response to RFI letter dated 12 April 2022

Table 1 provides a response to each of the matters raised in Council's RFI letter dated 12 April 2022.

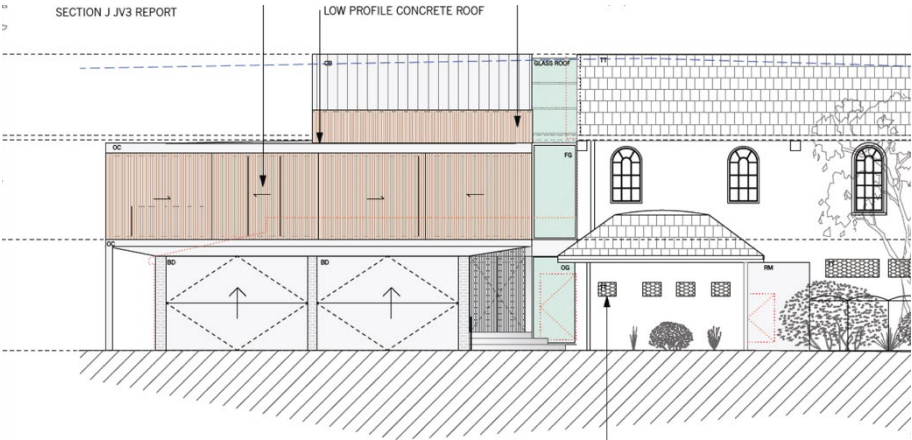
Table 1: Response to RFI letter dated 12 April 2022	
Matter	Response
<p><b>Heritage Issues</b></p> <p>Council has commissioned an independent Heritage Review of the proposed development by PTW Architects, which is attached to this correspondence.</p> <p>In summary, the review concludes that the proposal cannot be supported for the following reasons:</p> <p><b><u>6.2 Recommendations</u></b></p> <p><i>An assessment of DA2021/2173 is not supported in its current form. This is confirmed in the tabulations of inadequacies identified under Sections 3 - 5 of this report, including the previous commentary.</i></p> <p><i>While this report supports in principle the need to provide additional storage space and to modernise the public change rooms, along with a need to improve operational and economic viability of the club, the proposed alterations and additions to Newport Surf Club, a local heritage LEP item, has adverse heritage impact. This impact is not adequately assessed in the supporting SoHI document.</i></p> <p><i>DA2021/2173 therefore cannot be supported on heritage grounds as confirmed by the following three reasons (refer Figure 11):</i></p> <p><b><u>1. Inadequate visual and physical separation between the old and new</u></b></p> <p><i>The proposed addition with a new eaves line and projecting west facing wing, do not satisfactory distinguish the old from the new. This adverse impact is therefore unacceptable.</i></p> <p><b><u>Recommendation 1A and 1B:</u></b> Amend the design so that the proposed eaves line is more sympathetic in detail and that the projecting two storey west facing wing is positioned further away from the historic item. To the proposed addition: provide an</p>	<p>A copy of the independent Heritage Review prepared by PTW Architects (dated March 2022) has been reviewed by APA and the heritage consultant (Heritage 21) including the recommendations outlined in Section 6.1 of the review.</p> <p><b><u>Recommendations 1A and 1B</u></b></p> <p>The design of the proposed addition has been amended so as to create a clear distinction between the old and the new. A 1.35m wide glass link is provided between the existing SLSC building and the new addition (<b>Figure 1</b>). This includes a new glazed roof above the Committee Room.</p>  <p><b>Figure 1</b> Extract from Drawing 014 Proposed Elevations (APA)</p> <p>A vaulted gable roof with concealed gutters and no eaves is provided above the Committee Room. Materials and finishes of the proposed extension have been amended to further distinguish the old and the new including use of standing seam Colorbond roof over the Committee Room and Lounge areas.</p> <p><b><u>Recommendation 2</u></b></p> <p>In order to retain the 'volumetric form' of the original first floor hall, the existing false ceiling is to be removed and a new ceiling is to be installed to the underside of the rafters (<b>Figure 2</b>).</p>

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## Matter

eaves line which reinterprets the original Mediterranean style eave; and provide a larger recess (that is, a negative joint) adjacent to the existing building (say in the order of 2m) so that a greater physical and visual separation is provided.

### 2. Failure to retain internal highly significant fabric

Removal of the original volumetric form of the upper-level Hall is unacceptable, given that the CMP identifies this as fabric of high significance. This adverse impact is therefore not supported. Furthermore, the SoHI does not assess the impact of the removal of original fabric and does not assess the loss of heritage significance.

**Recommendation 2:** Replan the upper-level portion of the proposed works so that the volumetric form of the Hall is retained. Consider relocating the lift and toilets so that the proposed addition retains the heritage significance of the place.

### 3. An inadequate SoHI and an incomplete CMP

The SoHI is inadequate and doesn't fully assess the heritage impact of the proposal on the significance of the building and its setting. The CMP is incomplete and does not identify the moveable heritage items or establish how these items are to be conserved.

**Recommendation 3:** Revise the SoHI so that all impacts are assessed. Identify and assess the adverse and minor impacts once the architectural drawings are revised, as per the above recommendations. Seek to have the CMP revised so that moveable heritage items are identified along with how these items are to be conserved onsite. The architectural drawings should be revised to identify these items."

The attached Heritage Review by PTW Architects should be read in full and in conjunction with the contents of this letter.

## Response

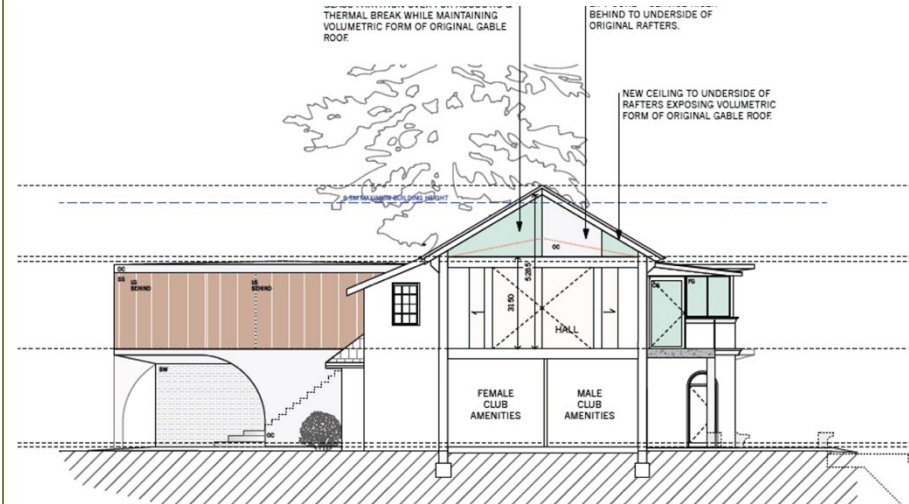


Figure 2 Extract from Drawing 013 of Proposed Section B

The Statement of Heritage Impact (SoHI) prepared by Heritage 21 has been updated to provide the following assessment against Policy 31 (Internal Layout) of the amended Conservation Management Plan (CMP):

*The internal layout of the Clubhouse has been greatly altered from the original. The proposal aims to untie the knot of rooms on the ground floor which do not reflect the original layout, and vastly improves the accessibility of the building. The creation of a central corridor and staircase would provide a united access point for building users, entering from the eastern or western elevations. Whilst the inclusion of a new lift at this access point would require alteration to the original floor joints, it allows for a dignified and common access point for all users of the building.*

*The modifications to the first floor involve relocating the existing amenities to the central area of the hall. This relocation of amenities was deemed crucial to allow these facilities to be accessed simultaneously by people using the Committee Room or Hall. The area of the hall is considered to be of high significance as it retains its original volumetric space and features unobstructed view lines to the ocean. However, there has been numerous renovations which have resulted in the loss of original fabric, notably the floorboards and ceiling which were installed in 2007. It is acknowledged that this relocation of services would disrupt the volumetric space of the hall and its original layout. However, in order to minimise the impact,*

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	<p><i>it is proposed to remove the existing, later addition plasterboard ceiling of the hall. This would result in vastly increased space from floor to ceiling. The partitions for these new rooms would be light weight, reversible and would not extend to the rafters in order to retain this newfound space. Whilst these works would have an impact, Heritage 21 is of the opinion that a sympathetic solution has been found which is still able to attain club requirements.</i></p> <p><u>Recommendation 3</u> The SoHI has been updated to assess the amended proposal.</p> <p>The CMP has been updated to identify moveable heritage (such as photographs, honour rolls and part of row boats) located within the existing Newport SLSC building (Appendix A of the CMP). Recommendations are provided in the CMP relating to conservation management strategies for items of moveable heritage. Figures 127 and 128 of the CMP identify potential general locations on the ground floor and first floor for the display of moveable heritage.</p>
<p><b>Design and Sustainability Advisory Panel (DSAP)</b></p> <p>The proposal was reviewed by Council's Design and Sustainability Advisory Panel (DSAP) on 9 December 2021. A copy of the DSAP Report is provided as an appendix to this letter. That Report includes a number of recommendations that should be considered in conjunction with the Heritage Recommendations in informing any amended design.</p> <p>In summary, the key issues raised by the DSAP include:</p> <ul style="list-style-type: none"> <li>• <i>Providing a clearer articulation between the old and the new.</i></li> <li>• <i>Choice of material that differentiates between the old and the new.</i></li> <li>• <i>Development of a broader site and landscape plan.</i></li> <li>• <i>Level of amenity provided by public amenities.</i></li> </ul>	<p>The feedback from Council's DSAP has been reviewed by APA.</p> <p>As noted above, the design of the proposed development has been amended to provide a clearer articulation between the old and the new and the schedule of materials and finishes has been updated.</p> <p>A landscape context plan (LA-000) has been prepared by APA that illustrates the new development within the context of Newport Beach; Bert Payne Park; existing children's playground and Youth Space; and existing beach carpark. This plan shows how the alterations and additions to the Newport SLSC building have been integrated within its surrounding context.</p> <p>The design of the public amenities has been reviewed and it has been verified that the provision of public amenities exceeds the existing provision.</p>
<p><b>Waste Management</b></p> <p>Council's Waste Officer has provided the following advice:</p> <p><i>This proposal is not supported because there is insufficient bin storage facilities provided. There is a requirement for 2 separate bin rooms, one to cater for the waste generated by the club activities e.g. volunteers, nippers, general training and surf life saving activities. A second bin room is required for the commercial activities that take place, e.g. kiosk, the function room, the bar.</i></p>	<p>A dedicated bin store is provided beneath the stairs to the first-floor stairs. This bin store is provided for waste generated by club activities and has capacity for 6 x 240L bins. A second open bin storage area is provided to the north of the Newport SLSC building.</p> <p>Both bin storage areas can be easily serviced from the existing car park.</p> <p>An advice letter has been prepared on behalf of Newport SLSC that notes that the proposed development doesn't seek to intensify the existing use of the building and the existing waste provision has been found to be adequate. The letter notes that the requirement for waste facilities needs to be balanced with heritage and operational considerations.</p>

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<p><i>The proposal for 3 x 240L bins to be stored in a plant room is unacceptable, bins need to be stored in a dedicated separate room. It is recommended that the bin room for the club activities waste be able to house 6 x 240L bins and the bin room for the commercial activities house 8 x 240L bins. These rooms must be easily accessible for servicing and use, via a flat, smooth, concrete path that is 1.2m wide.</i></p> <p><i>Both bin rooms must remain under the control of Council and are not to be included in area leased by the club.</i></p>	
<p><b>Landscape</b></p> <p>Council's Landscape Officer is supportive of the proposal but requests a revised landscape plan to be produced prior to the issue of any Construction Certificate. As the above matters will necessitate a redesign of the proposal, it is recommended that the landscaping concerns be addressed concurrently.</p> <p>The Landscape Officer provided the following comments:</p> <p><i>A Landscape Plan is to be submitted that essentially preserves the existing landscape area and additional planting is suitable for the coastal environment, albeit some minor changes and no concerns are raised generally, excluding items as listed below:</i></p> <ul style="list-style-type: none"> <li><i>The extended building containing the storage facility at ground level and multi- purpose room on the first floor level occupies existing carparking surface areas and removes existing kerb and footpaths, and no information is provided on the landscape plan, and all other relevant documents, on the treatment to the proposed new footpath and kerb alignment, kerb ramping, and any other safety provisions for pedestrians if required,</i></li> <li><i>Identification of existing vegetation to be retained in proximity to the development and within existing gardens, and detail information on new planting including species selection, pot sizes, and planting densities.</i></li> </ul>	<p>Landscape Plans have been prepared by APA as follows:</p> <ul style="list-style-type: none"> <li>LA-000 Landscape Concept Plan;</li> <li>LA-01 Landscape Site Plan; and</li> <li>LA-02 Landscape Planting Plan.</li> </ul> <p>Information about the proposed interface between the new site works including new footpaths, kerbs and ramps is shown on Drawing LA-01.</p> <p>Drawing LA-02 provides details relating to existing and new landscape proposed within the vicinity of Newport SLSC building including a planting schedule that provides detailed information on new planting including species selection, pot sizes and planting densities.</p>

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<p><b>Acoustic Issues</b></p> <p>While Council's Environmental Health Officer has raised no concern from an acoustic perspective, subject to conditions, there are points of clarification which are required to be addressed, as follows:</p> <ul style="list-style-type: none"> <li>• <i>The supporting acoustic report refers to the Warringah DCP. The report needs updated to refer to the correct P21DCP and relevant controls.</i></li> <li>• <i>The report refers to operational hours on Sunday, 10am – 10pm, while the SEE refer to hours on Sunday, 10am – 12am. Clarification is required and assessment amended, where required.</i></li> <li>• <i>The acoustic report refers to live music being "on occasion". The Applicant is to elaborate on this to suggest days/times.</i></li> </ul>	<p>An updated Acoustic Report has been prepared by GHD (dated May 2022). The Acoustic Report has been updated to refer to the Pittwater 21 Development Control Plan and in particular Section C2.10 Pollution Control (which is equivalent to Section C5.17 Pollution Control).</p> <p>The proposed operational hours of the licensed premises are:</p> <ul style="list-style-type: none"> <li>• Monday to Thursday: 12pm to 9pm;</li> <li>• Saturday 10am to 12am; and</li> <li>• Sunday: 10am to 10pm.</li> </ul> <p>It is proposed that live music will occur at any time when the licensed premises are operating (as identified above).</p>
<p><b>Temporary Facilities Arrangements</b></p> <p>While the SEE refers to "installation of temporary site amenities", the application does not provide detail regarding the arrangements for the storage of boats, equipment etc. during the construction phase. Detail is also to be provided in relation public bathrooms during construction.</p> <p>Specific details are to be required, including temporary WCs (and number of WCs and location) to be available to the public during construction, and up until the completion of replacement bathroom facilities. An Operational Management Plan for their ongoing operation is to be prepared and submitted.</p>	<p>An Operational Management Plan (OMP) has been prepared by Northern Beaches Council and Newport SLSC. The OMP details the operation and management of the temporary facilities at the Newport SLSC during the demolition and construction phase.</p> <p>The temporary facilities include the following facilities:</p> <ul style="list-style-type: none"> <li>• <u>Newport SLSC Main storage compound</u>: This comprises two (2) compounds for storage of surf boats and surf skis, which will be located within the car park approximately 60m to the north of the existing building. The overall footprint of the main storage compound is 420m<sup>2</sup>.</li> <li>• <u>Newport SLSC Main Operations Compound</u>: The main storage compound is located within Bert Payne Reserve adjacent to the beach (south of the existing Newport SLSC building). The main operation compound includes the following areas: professional lifeguard and store; all-weather beach surveillance space; first aid room; patrol gear store; Nippers store; training room accommodation / administration office; uniform and training gear store; bin storage; male and female members amenities; IRB storage and trailer; and hardstand area for manoeuvrability and washdown.</li> <li>• <u>Public Amenities</u>: These will be located within the vicinity of the existing children's playground and Youth Space and includes: <ul style="list-style-type: none"> <li>○ Six (6) x Male WCs;</li> <li>○ Six (6) x Male showers;</li> <li>○ Six (6) x Female WCs</li> <li>○ Six (6) x Female showers; and</li> <li>○ One (1) x Unisex accessible toilet and shower.</li> </ul> </li> </ul> <p>The location of these temporary facilities is shown in Appendix 1 of the OMP.</p>

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	<p>The Newport SLSC main storage and main operations compounds will be managed by Newport SLSC. The public amenities will be managed by Council.</p> <p>Public access will be maintained to the beach during the demolition and construction phase including the ability for emergency vehicles to access the beach.</p>
<p><b>Views</b></p> <p>The supporting SEE by DFP provides commentary in relation to views by undertaking an assessment against the view sharing principle under Tenacity Consulting v Warringah Council. While this planning principle considers the acceptability of a proposed development on views enjoyed from private property in the vicinity of the development, it does not consider the acceptability of an impact of development on views from the public domain in the vicinity of the development.</p> <p>The Applicant is required to have regard to <i>Rose Bay Marina Pty Limited v Woollahra Municipal Council</i> in relation to potential impact on public domain views.</p>	<p>An assessment in accordance the planning principle relating to impact on public domain views established by <i>Rose Bay Marina Pty Limited v Woollahra Municipal Council and anor {2013} NSWLEC 1046</i> has been completed by DFP Planning. The public view impact assessment concludes that the proposed development will not have any adverse impacts on public domain views of the original heritage listed Newport SLSC building or the surrounding local context of Newport Beach.</p>
<p><b>Building Height</b></p> <p>Clarification is required on the building height measurement.</p> <p>The SEE states that “<i>The existing terracotta roof has a maximum RL of 14.6, which is approximately 8.94m above the existing ground level of RL 5.66</i>”. A review of the plans has found that an existing ground level RL of 5.49, which would result in a building height of 9.11m rather than 8.94m.</p>	<p>The clause 4.6 written request to vary the 8.5m height of buildings development standard has been updated by DFP Planning. The existing building has a maximum height of 9.11m above the existing ground level (based on the existing finished floor level within the SLSC storerooms) and exceeds the maximum building height of 8.5m by 0.61m. This is equivalent to a variation of 7.2%.</p> <p>The clause 4.6 written request concludes:</p> <p><i>We have assessed the proposed exceedance of the 8.5m height of buildings development standard against the relevant statutory provisions of clause 4.6 of LEP and prepared this updated written request which provides justification that compliance with the height of buildings development standard is unreasonable or unnecessary in the circumstances of the case, as follows:</i></p> <ul style="list-style-type: none"> <li>• <i>The revised proposed development is consistent with the objectives of the height of buildings development standard and the objectives of the RE1 zone;</i></li> <li>• <i>The exceedance of the height of buildings development standard is consistent with the existing height of the Newport SLSC building with the proposed pitched roof but with a metal finish extending the form of the existing terracotta gable roof of the original Newport SLSC building to match;</i></li> <li>• <i>The proposed development will not have an adverse impact on the significance of the heritage item (Item 2270445 “Newport Surf Life Saving Club”);</i></li> </ul>





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	<ul style="list-style-type: none"> <li>• <i>The exceedance of the height of buildings development standard will not result in additional visual impact and the proposed alterations and additions are consistent with the desired future character of Newport and the distinctive landscape character of Newport Beach; and</i></li> <li>• <i>The proposed alterations and additions will not result in any significant public domain or private view loss and the view-sharing is considered to be reasonable with the development representing a skilful and high-quality architectural design.</i></li> </ul> <p><i>Accordingly, the justification within this written request is considered to be well founded.</i></p>
<p><b>Liquor License</b></p> <p>The SEE states that the existing on-premises liquor license requires functions to finish by 12.00 midnight. A copy of the liquor license is to be provided for review.</p>	<p>A copy of the current on-premises liquor license for Newport Surf Life Saving Club Inc (License No. LIQO660031470) is provided as part of the RFI package.</p>



### 3.0 Conclusion

It is considered that the amendments to the proposed development satisfactorily address the matters raised in Council's RFI letter dated 12 April 2022.

Please don't hesitate to contact the undersigned if you have any queries or require further information.

Yours faithfully

**DFP PLANNING PTY LTD**

A handwritten signature in black ink, appearing to be 'A. Cropley', written over a horizontal line.

**AMY CROPLEY**  
**URBAN DESIGNER / PRINCIPAL PLANNER**

acropley@dfpplanning.com.au

Reviewed: A handwritten signature in black ink, appearing to be 'R. Hanger', written over a horizontal line.