

Report to: Planning Committee

Date: 03 June 2025

Application No: 240561

Location: Martello tower no 66 at the Crumbles, 320m north-east of Langney Point

Proposal: Proposed residential use as a holiday home to include an upward extension to create an additional floor

Applicant: Mr Robert Adams

Ward: Sovereign

Recommendation: Delegate to the Head of Development Management to:

- Conclude consultation with the County Ecologist following receipt of further information as requested.
- Receive updated drawings that remove the parking provision from the scheme

And on the provision that no substantive objection is received following conclusion of consultation, to:

Grant Planning Permission subject to conditions, including the imposition of additional mitigations required following receipt of consultation responses.

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Site Location Plan:



1.	Executive Summary
1.1	The application is being presented to the Planning Committee in line with the Council's Schemes of Delegation, due to the significant number of representations received.
1.2	The application seeks permission for the change of use and alterations, including upwards extension, to the Scheduled Monument of Martello Tower 66 to provide short-term holiday accommodation.
1.3	The tower is a circular structure erected as part of the coastal defences for the expected Napoleonic invasion. The tower formed 1 of 74 towers constructed between 1805-1810 along the south coast, of which only 26 now survive. This application is running alongside a similar proposal for Martello Tower 64 under reference 240561.
1.4	The applicant has worked closely with Historic England over the last few years to achieve a design proposal which would be supported. The Secretary of State issued Scheduled Monument Consent for the proposal on 04 July 2024.
1.5	The Councils Planning Lawyer has advised the following regarding listed building consent: <i>The law protecting scheduled monuments is the Ancient Monuments and Archaeological Areas Act 1979. Works carried out to a scheduled monument must have consent from the Secretary of State (s2 AMAAA 1979) This is separate from the statutory planning process. However, the two processes can run in parallel if planning permission is also required for proposed works to a Scheduled Monument.</i> <i>If a building is both Scheduled and Listed, ancient monuments legislation takes precedence by virtue of Section 61 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and Scheduled Monument Consent rather than Listed Building Consent is required for works.</i> The listed building consent application submitted for Martello Tower 66 under application reference 240560 has therefore been withdrawn.
1.6	Merits of the scheme can be summarised as: • Conservation and continued maintenance of an important and historic structure which is currently on the Heritage at Risk list • Unique tourism opportunity for the Borough.
1.7	<u>Design and Heritage:</u> The proposal would make efficient use of an underused building that may otherwise fall into a state of disrepair and harm the heritage asset. Viable use of the building would lead to the long-term protection of the heritage asset. The alterations and additions to the tower have been designed to protect and enhance the building whilst maintaining its integrity as a heritage asset. This would carry significant positive weight in the planning balance.

1.8	<u>Social Benefits:</u> The proposal would bring into use the heritage asset and provides the opportunity for public open days to promote the history of the tower. This carries significant positive weight in the planning balance.
1.9	<u>Economic Benefits:</u> The proposal is outside of the tourism accommodation area, however, the proposal is a unique opportunity to bring forward a new type of tourist accommodation within the Borough through the conversion of the existing structure. This carries moderate positive weight in the planning balance.
1.10	<u>Sustainability:</u> The proposal includes sustainability measures where possible, balanced with the impact on the heritage asset, including the use of solar panels that would not impact the appreciate of the building. This carries moderate positive weight in the planning balance.
1.11	<u>Transport:</u> The proposed short term holiday lettings use would encourage an insignificant increase in vehicular activity on the surrounding highway network created by visitors to the site. This would be limited to the existing highway network and would not impact upon the seafront/beach setting. This carries limited negative weight in the planning balance.
1.12	The application accords with national and local planning policy and is recommended for approval, subject to conditions.
1.13	It should be noted this application is running alongside a similar application for Martello Tower 64 under planning reference 240561.

2.	Relevant Planning Policies
2.1	<u>National Planning Policy Framework:</u> 2. Achieving sustainable development 4. Decision making 5. Delivering a sufficient supply of homes 6. Building a strong, competitive economy 8. Promoting healthy and safe communities 9. Promoting sustainable transport 11. Making effective use of land 12. Achieving well-designed places 14. Meeting the challenge of climate change, flooding, and coastal change 15. Conserving and enhancing the natural environment 16. Conserving and enhancing the historic environment.

2.2	<u>Eastbourne Core Strategy 2006-2027:</u> B1: Spatial Development Strategy and Distribution B2: Creating Sustainable Neighbourhoods C14: Sovereign Neighbourhood Policy D1: Sustainable Development D2: Economy D8: Sustainable Travel D9: Natural Environment D10: Historic Environment D10a: Design.
2.3	<u>Saved policies of the Eastbourne Borough Plan 2001-2011:</u> HO2: Predominantly Residential Areas HO7 Redevelopment HO9: Conversions and Change of Use HO20: Residential Amenity NE4: Sustainable Drainage Systems NE14: Source Protection Zone NE18: Noise NE28: Environmental Amenity TR2: Travel Demands TR6: Facilities for Cyclists TR11: Car Parking. UHT1: Design of New Development UHT4: Visual Amenity UHT5: Protecting Walls/Landscape Features UHT7: Landscaping UHT17: Protection of Listed Buildings and their Settings UHT19: Retention of Historic Buildings.
3.	Site Description
3.1	The application site is the Grade II Listed Scheduled Monument Martello Tower 66 constructed in 1805-06. The tower is located on the seafront area near the harbour arm and is over 100m away from the nearest residential properties of White Point and Martinique Way.
3.2	The tower is a circular brick-built structure built as part of the coastal sea defences from the threat of Napoleonic invasion.
3.3	The tower is 13m in diameter externally and stand to a height of approximately 10m. Its battered (inwardly sloping) walls, designed to deflect cannon shot, range in thickness from 1.6m to around 4m on the seaward side. Externally, the tower was rendered in a cement mortar to protect the outer skin of bricks, although much of this has now been lost.
3.4	The tower is constructed of three levels with a central column rising between the basement and the top of the tower and gun platform on the roof.

3.5	The site is within an area of Eastbourne seafront vital to the maintenance and management of the coastal sea defences managed by the Environment Agency known as the Pevensey to Eastbourne Coastal Management Scheme.
3.6	<u>Site Constraints:</u> Grade II Listed Ancient Monument Flood Zone 3 Strategic Coastal Defence Eastbourne Borough Council Covenant Trustees of the Chatsworth Settlement Covenant.

4.	Proposed Development
4.1	The application seeks planning permission for the change of use, along with upward extension, external and internal alterations to use the structure as short-term holiday accommodation under Use Class C1.
4.2	The proposal is to provide a new roof extension capped with a circular zinc clad, light construction metal and timber structure with curved, frameless, sliding glazed windows.

5.	Relevant Planning History:
5.1	No relevant planning history.

6.	Consultations:
6.1	We are satisfied that our objection to the proposal can be withdrawn following the inclusion of the conditions below on any permission granted: The development shall be carried out in accordance with the submitted design and access statement (ref Revision A, dated November 2024, complied by KOLDO&CO) and the following mitigation measures it details on page 7: • The tower will remain closed during the period that the E.A. carries the beach maintenance works. These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development. Reason(s) • To safely allow the Environment Agency to access the site to undertake beach maintenance works. Prior to occupation a plan will be submitted detailing how the interaction between residents and Environment Agency staff during times of emergency beach operations will be managed. Reason(s) • To safely allow the Environment Agency to access the site to undertake emergency beach maintenance works. To ensure flood protection standards are maintained. The Environment Agency undertakes maintenance works at this location sometimes at short notice in response adverse weather or other factors. This is for the collection of material for use on Environment Agency defences at another location. The applicant should be aware of this and the potential for disruption to inhabitants of the structure at short notice. Advice to LPA/Applicant: Matters relating to changing the Environment Agency's access route in the deed for this plot of land cannot be amended via the planning process. The applicant is to modify this via discussions with the Environment Agency's relevant legal representative. <u><i>Modifications to defence under local authorities remit.</i></u> The Environment Agency does not maintain the defences at this location. The defences at present fall under the local authority's remit. The local authority should satisfy themselves that any modifications to these defences are acceptable.

Historic England

This advice letter takes into consideration the parallel planning applications for both Martello Tower 66 (ref 240559) and Martello Tower 64 (ref 240561). This is because Martello Towers were devised as a chain of defences, and it is therefore important to consider the proposals for both Tower 66 and 64 in conjunction.

Historically, alteration of Martello towers to domestic use has been consented but has often been considered harmful in retrospect. Historic England now typically have strong concerns regarding applications of this nature. However, from working with the applicant during a lengthy period of pre-application advice, we think that the proposals now meet the criteria set out in the National Planning Policy Framework and, on balance, that the heritage-based public benefits outweigh the harm.

The proposals therefore have our support and have obtained conditional Scheduled Monument Consent from the Secretary of State for the Department of Media, Culture and Sport.

Historic England Advice:

Significance of Martello Towers 66 and 64

Martello towers are gun towers which were constructed to defend the vulnerable southeastern coast of England against the threat of the Napoleonic forces. They were built as a systematic chain of defence in two phases, between 1805-1810 along the coasts of East Sussex and Kent, and between 1808-1812 along the coasts of Essex and Suffolk.

The towers of the south coast were numbered 1 through 74 from east to west. In scheduling terms, Martello towers as a class of monuments are considered 'very rare' nationally as there are less than 50 examples (47 at the time of the MPP in 1988). Only 26 of the 74 Martello Towers built along the south coast remain extant.

This means that part of the significance of these two towers is the now very rare opportunity to see along the chain between Martello's 66, 64, 61 and 62. This is the only remaining example where more than two towers are inter-visible. Therefore, the ability to understand these monuments as repeating, interlinked structures along the coastal landscape is a key element of their significance.

They are highly uniform in their design, though minor variations do exist. Their construction is highly illustrative of their defensive purpose both in terms of general massing and architectural detail. For example, the gun emplacement, the round squat shape of the tower, the sheer walls, the first-floor entrance, the narrow windows all demonstrate the original intention to make the building defensible against incoming artillery and infantry.

Both towers retain a good amount of original Napoleonic interior and roof-level features, such as: central pier and vaulting, fireplaces, corbels for radial floor joists, magazines, the gun pivot, gun races, hauling rings and the traversing carriage in no.64 and the 64-pounder gun in no.66.

The remains of the second world war structures on the gun platform level and other alterations also contributes to significance in that it demonstrates the re-use of the towers at a time of renewed threat of invasion. It is noted that these later alterations are also partly intrusive to the Napoleonic structure, however we still consider them part of the overall historic interest of the monuments. Other towers (such as no.55) which previously had such WWII alterations have generally had this phase of construction demolished. Tower 64 has had substantially more WWII alteration than no.66, such as the addition of ground floor doors, the creation of gun loops within original windows, and the concreting in of features such as vents and downpipes.

Both of the towers are currently on Historic England's Heritage at Risk (HAR) register. Martello 64 is listed as being in Poor condition, priority C - slow decay and no solution agreed; Martello 66 is listed as being in Fair condition, priority E - under repair or in fair to good repair, but no user identified; or under threat of vacancy with no obvious new user (applicable only to buildings capable of beneficial use).

Impact of the proposals on the significance of Martello Towers 66 and 64:

a) Potential harm to significance

Adapting these towers from disused military structures to holiday lets would fundamentally alter how people understand and engage with them. Harm to the significance of the towers would be caused by making them habitable to modern standards. This is principally because the austere, martial character of the tower would be lessened by such alteration.

Harm would be caused by the changes proposed to the gun platform level. The ability to read the gun platforms as functional spaces for both monitoring and defensive purposes is of particular significance, as this is the primary reason for their construction. Therefore, despite the more modern alterations to their roofs, this level is also particularly sensitive to change. A large part of the WWII gun emplacements, including their roofs will be demolished, although a portion of the façade on the eastern, landward sides will be retained.

There would also be some harm caused by changing the interior layouts and installing domestic equipment and modern furnishings. This would inherently obscure interior finishes and would likely require some damage to the historic fabric, though it is recognised that great effort has been made to avoid or minimise these impacts through design.

b) Potential heritage benefits

The conservation of the fabric and of particular design elements would provide an historic benefit through better highlighting, re-creating, restoring, and/or retaining notable architectural features. This includes:

- reinstating the first-floor access on both towers. For tower 66 this includes excavating the shingle around the tower to re-establish the original height
- retention and repairs / conservation of all external and internal brickwork, surviving window and door surrounds, fireplaces and flues, external stucco render, and stone coping stones on the parapet
- re-creation of the timber floor utilising the existing stone templates and central pier ledge and internal timber room partitioning
- restoration of the gun emplacement features such as hauling rings, central pivot, and racer tracks. This includes conserving both the 24-pounder gun from tower 66 and the wooden traversing carriage from tower 64 and using both combined as a feature in tower 64
- clearing debris from, and undertaking repairs to, basement water cistern

The provision of ongoing and continued management of the towers would also be of substantial benefit and would likely halt the slow decay of which they are 'at risk'.

Further heritage-based public benefits would be gained through commitments to public open days and a programme of community engagement during the redevelopment process and the building recording. These could also be secured through planning condition.

Policy considerations for this proposal:

Paragraph 200 of the National Planning Policy Framework (NPPF) states that the local planning authority should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to their significance. In this case, the heritage asset is of National significance.

Paragraph 201 says that local planning authorities should consider the significance of heritage assets and seek to avoid or minimise any conflict between conservation and any aspect of the proposal.

Paragraph 203 indicates that the local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

Paragraph 205 of the NPPF states that when considering the impact of the proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation irrespective of the level of harm which may be had.

Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.

Paragraph 208 states that where a development proposal will lead to less than substantial harm, such as in the case of this application, this harm should be weighed against the public benefits of the proposal.

Historic England's position on the proposals:

The harm to the significance of the scheduled monuments would be primarily due to the loss of WWII fabric and the impact on the character and legibility of the towers as historic military defences. For Martello 64, which had more intensive WWII use and alterations, this harm is slightly greater as more impact on the fabric associated with this phase of use will be had. For the purposes of NPPF however, the harm to both towers would be in the middle range of less than substantial.

However, we also consider that:

- There is very limited harm to Napoleonic fabric.
- There would be a high level of benefit from conservation and ongoing management of the structure
 - Although some of the WWII fabric will be removed, the proposals retain aspects of the more significant elements, allowing for this phase of use to be legible
- Although the character of the monuments will be altered, the main structural components and the illustrative historical interest will be largely retained
 - Key features which are illustrative of the construction and defensive purpose of the Martello towers will be retained or reinstated, enhancing historical interest (such as the first-floor entrance, 360-degree views from the roof, internal features such as fireplaces, magazine stores, partitioning, etc., and, in Martello 64, the integration of a restored traversing carriage and cannon)
 - The intervisibility between towers 66 and 64 and their legibility as a unified defensive system will be retained
- In summary, the public benefit primarily results from heritage benefit, i.e. the enhancement and reinstatement of Napoleonic historic features, the conservation of fabric, and the provision of ongoing management of the two towers. These works would likely remove these assets from the HAR register in due course.

There are also wider public benefits through greater access to the towers internally, both through the holiday let and public open days, the provision of interpretation, and allowing for community engagement in the development process which could be secured through planning conditions.

We therefore consider that the heritage benefits of the proposal, which can

	be considered as public benefits, outweigh the harm. We also consider that, given that these two towers have become a rare illustrative example of the defensive line of Martello's that was present, it is particularly important that the connectivity between these towers is retained. To that end, the proposals here represent a relatively rare opportunity to consider the treatment of both towers simultaneously. Both of the towers, once developed, would have a similar external design and aesthetic, which would serve to retain the existing visual connection and their legibility as repeating structural units. Recommendation Historic England supports the application on heritage grounds. We consider that the application meets the requirements of the NPPF, in particular paragraph numbers 200, 201, 203, 206, and 208. Should you be minded to approve this application, we would recommend that it incorporates a planning condition related to the agreement of a management plan which should include ongoing monitoring of the monuments' condition and the provision for public engagement. In determining this application, you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.
6.3	<u>Conservation Officer</u> If a building is both Scheduled and Listed, ancient monuments legislation takes precedence by virtue of Section 61 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and Scheduled Monument Consent rather than Listed Building Consent is required for works.
6.4	<u>East Sussex Highways</u> Refer to standing advice and ensure no shingle would make its way onto the highway.
6.5	<u>County Ecology</u> Holding objection at the time of writing the report with the request for further information to be provided.

6.6	<u>Eastbourne Society</u> We wish to add our support for this application to that of Historic England as representing the best way of securing the long-term future of this historic structure, currently on Historic England's Building at Risk Register. We note that the applicant has drawn up the proposals in such a way that they meet the strict criteria of Historic England for a conversion of this type.
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7.	Other Representations:
7.1	<u>Notification:</u> Notification of this application has been undertaken in the form of: a. neighbour notification letters; b. site notices displayed in roads neighbouring the site c. Notification in the local paper.
7.2	<u>Neighbour Representations:</u> 54 letters of objection, 2 supporting comments and 5 neutral comments have been received. The objections raise the following concerns based upon material planning grounds: • Light pollution • Building is a heritage building • Access • Parking • Waste Collection • Noise • Impact to wildlife • Disruption during construction • External changes are not in keeping • Safety of occupants • Impact to privacy • Impact to EA beach works. <u>Non-Planning Considerations:</u> • Sovereign harbour restricts short-term lettings to properties on Caroline Way • Impact to Views.

8.	Appraisal:
8.1	<u>Key Considerations:</u> The key matters taken into consideration when assessing the impacts of the proposed scheme include impacts upon the listed heritage asset, the impacts to the Boroughs flood defences, the impacts upon visual and residential amenity and the impacts upon the ecology and biodiversity of the site. This application is running alongside a similar proposal for Martello Tower 66.
8.2	<u>Principle of Development:</u> The application seeks permission to redevelop the schedule monument of Martello Tower 64 to be used as a holiday letting. Policy UHT17 advises planning permission will be granted for alterations and extensions will only be granted where the works would preserve the inherent character of the listed building and its features of special architectural or historic importance and Policy UHT19 Supports the change of use of historic buildings to ensure their retention. Scheduled Monument Consent has been granted by the secretary of state. The application site is located outside of the designated tourist accommodation area, Policy TO5 advises that in exceptional circumstances planning permission will be granted for accommodation outside of this area where it can be demonstrated the need for the proposal cannot be met within tourist accommodation area, the development would link to and compliment an existing or proposed tourism or leisure facility and where there would be no detrimental effect on residential, visual or environmental amenity. The proposal is to use an existing structure of significant historical importance, in this instance it is considered that the proposed scheme could not be accommodated within the tourist accommodation area and would bring into use a building that would otherwise remain derelict and would further decay. Overall, it is considered that the proposal accords with adopted policies, and that any impacts of the development can be suitable mitigated against.
8.3	<u>Visual Impact and Design:</u> The roof extension will increase the height of the structure approximately 0.9m with zinc roof sheets which will have a dull, non-shiny finish, grey in colour to blend with the existing building. Solar panels will be installed to the new roof and will use a solar battery storage system located in the plant room at ground floor level. A new staircase will be installed externally with a light metal structure and open timber treads that will lead up to the reinstated entrance to the Tower

	at first floor level. The alterations to the property are well designed and in keeping with the existing structure.
8.4	<u>Impact upon Heritage Assets:</u> The application site is a scheduled monument and Grade II Listed known as Martello Tower 64 and is one of 26 surviving Martello Towers on the south coast. Prior to submission of this application scheduled monument consent has been granted by the secretary of state with the decision notice issued on 04 July 2024. Alongside this planning application a listed building consent application was also submitted, it was confirmed by the Councils planning legal team that listed building consent was not required due to Scheduled Monument Consent having already been granted. Heritage England were consulted as part of the application process who welcomed the proposal to bring back into use Martello Tower 64 which is currently on the Heritage at Risk List as priority C – Slow Decay.
8.5	<u>Flood Risk</u> Following extensive discussion with the Environment Agency, the objection initially raised has been removed and no objection is being raised subject to the imposition of conditions. A key aspect to raising no objection is ensuring that the new use of the tower does not interfere with the Pevensy to Eastbourne Management Scheme which is vital to protect the town. The Tower is located in an area where beach works take place between October and March with large plant operating in the area during these works. For safety reasons access to the beach during these times is restricted to protect the operators of the plant and the public. Whilst works generally take place October to March each year, there may also be times in an emergency where access will be restricted to the Tower. A planning condition is included which requires further details on how this will be managed. Measures to protect the occupants of the Tower when it is in use include the reinstatement of the first-floor level entrance also provides the tower occupants a safe layer of protection against any risk of flooding. By removing the existing modern entry point at ground floor level and having the building entrance / door reinstated at the level which would be at risk of flooding, the proposal provides the occupants of the building, if ever surrounded by floodwaters, a safe space within the building, with a means of escape at roof level.

8.6	<u>Transport and Parking:</u> The original application submitted included the provision of parking within the site for those occupying the Tower. Officers have concerns about the introduction of significant vehicular movements and parking on the beach for reasons other than emergency and coastal management, given the implications on the visual appearance of the beach and the setting of the heritage asset, together with safety implications for pedestrians. The site is sustainably located with unallocated parking available the nearby on the existing highway network, the scheme has therefore been amended to remove the parking provision. A condition is recommended to restrict the access of vehicles to the site, which would allow for access when required.
8.7	<u>Impact upon residential amenity:</u> The Tower is located approximately 44m from the nearest residential properties, there will be no detrimental impact upon the amenity of occupiers that surround the application site. The proposal includes low level light fittings to the access steps and a movement activated timed light fitting in the main entrance foot at first floor level, no other external lights are proposed. Windows are set within the chamfered deep into the thick walls of the structure, and the new roof structure is set back from the landward side which will further filter the internal lighting when the Tower is in use.
8.8	<u>Human Rights Implications:</u> The impacts of the proposal have been assessed as part of the application process. Consultation with the community has been undertaken and the impact on local people is set out above. The human rights considerations have been considered fully in balancing the planning issues; and furthermore, the proposals will not result in any breach of the Equalities Act 2010.
8.9	<u>Conclusion:</u> The change of use and alterations to the structure will provide an opportunity for the retention, preservation and on-going maintenance of the scheduled monument. The holiday accommodation will provide a unique experience for the occupants of the site and will promote the historic significance of the site. The application is found to be in accordance with national and local planning policies.

9.	Recommendations
9.1	Delegate to the head of Development Management to: a) Conclude consultation with the County Ecologist following receipt of further information as requested. b) Receive updated drawings that remove the parking provision from the scheme.
9.2	On the provision that no substantive objection is raised from these consultations, to: Grant planning permission subject to conditions, including the imposition of any required mitigations.

10.	Conditions
10.1	Timeframe: The development hereby permitted shall be begun before the expiration of three years from the date of permission. Reason: To comply with Sections 91 and 92 of the Town and County Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).
10.2	Drawings: The development hereby permitted shall be carried out in accordance with the approved drawings: Reason: For the avoidance of doubt and ensure that development is carried out in accordance with the plans to which the permission relates.
10.3	CEMP (Transport, Environmental Amenity and Flood Risk): No development shall take place, including any ground works or works of demolition, until a Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to in full throughout the entire construction period. The Plan shall provide details as appropriate but not be restricted to the following matters: • anticipated number, frequency and types of vehicles used during construction; • method of access and egress and routing of vehicles during construction; • parking of vehicles by site operatives and visitors; • loading and unloading of plant, materials and waste; • times of any deliveries related to the development, which should seek to avoid peak travel times; • photographic survey of the condition of the surrounding highway; • storage of plant and materials; • erection and maintenance of any security hoarding; • provision and operation of wheel washing facilities or any other works required to mitigate the impact of construction upon the public

	highway (including the provision of temporary Traffic Regulation Orders); • confirmation of no burning of materials on site; • operating hours; • anticipated timescales for construction; • measures to manage flood risk during construction; and • public notification, including site notices with public contact details during the works. Reason: In the interests of highway safety and the amenities of the area.
10.4	Flood Risk: The development shall be carried out in accordance with the submitted design and access statement (ref Revision A, dated November 2024, complied by KOLDO&CO) and the following mitigation measures it details on page 7: The tower will remain closed during the period that the E.A. carries the beach maintenance works. These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development. Reason: To safely allow the Environment Agency to access the site to undertake beach maintenance works.
10.5	Beach Operations Prior to occupation a plan will be submitted detailing how the interaction between residents and Environment Agency staff during times of emergency beach operations will be managed. Reason: To safely allow the Environment Agency to access the site to undertake emergency beach maintenance works. To ensure flood protection standards are maintained.
10.6	Maintenance and Management Plan: Prior to commencement, hereby approved, a Maintenance and Management Plan (MMP) for the development, hereby approved, shall be submitted to and approved in writing by the Local Planning Authority. The MMP shall include details of the ongoing monitoring of the condition of the building, the maintenance of the building, the cleanliness of the site and the provision for public engagement. The site shall be managed in accordance with the approved MMP for the lifetime of the development. Reason: To ensure satisfactory maintenance and management of the site to protect the amenity of the area and neighbouring occupants.

10.7	Occupancy The use hereby approved shall be for tourist accommodation only, at no time is the property to be used as permanent residential accommodation. Reason: To protect the amenity of occupiers of the site and neighbouring residential occupiers that surround the site.
10.8	Vehicular Access Vehicular access to the site shall be restricted to emergencies vehicles and vehicles required to carry out any formally consented works. Any additional vehicular movements in relation to the use, hereby approved, shall only take place with the prior written agreement of the Local Planning Authority. Reason: To protect the character of the seafront and beach area, ensure the safety of users of the seafront area and to protect residential amenity.
10.9	<u>Informatives</u> The Environment Agency undertakes maintenance work at this location sometimes at short notice in response to adverse weather or other factors. This is for the collection of material for use on Environment Agency defences at another location. The applicant should be aware of this and the potential for disruption to inhabitants of the structure at short notice. Advice to LPA/Applicant: Matters relating to changing the Environment Agency's access route in the deed for this plot of land cannot be amended via the planning process. The applicant is to modify this via discussions with the Environment Agency's relevant legal representative. <u><i>Modifications to defense under local authorities' remit.</i></u> The Environment Agency does not maintain the defences at this location. The defences at present fall under the local authority's remit. The local authority should satisfy themselves that any modifications to these defences are acceptable.
11.	Appendices
11.1	None.
12.	Background Papers
12.1	None.