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Eastbourne Borough Council  
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By e-mail to: [customerfirst@lewes-eastbourne.gov.uk](mailto:customerfirst@lewes-eastbourne.gov.uk)

*Dear Sir or Madam*

## **Planning Applications 240560 Martello Tower 66 & Planning Application 240562 Martello Tower 64**

Sovereign Harbour Residents Association (SHRA) represents the collective view of 1500 Sovereign Harbour residents who are members of the Association. Since the publication of the above planning applications, we have been listening to and speaking with members and residents affected by the proposed development.

We have received positive feedback about the proposed plans as they would ensure these historic buildings are restored and saved from further deterioration. We have also heard from residents living near the Towers who are concerned about several issues the development of the Towers as residential holiday accommodation will create. The principal concerns are listed below:

### **Parking on the Beach**

The proposal seeks approval for two vehicles to be parked on the beach alongside each tower, but it does not provide any evidence or detail about the proposed control and management of vehicles accessing the beach. The only vehicles allowed on the beaches are emergency services and Environment Agency-approved vehicles (replacing shingle and other coastline defence work). A concern is that if private cars are seen parked on the beach, others will try to follow.

The proposals suggest the key to the single barrier giving access to approved vehicles will be held by the owner and/or holiday let key holder. We believe it is naïve to suggest this arrangement will protect the beach and neighbouring residences from misuse. How will the number and type of vehicles accessing the Martello Tower be controlled? What guarantee and/or control will be in place to ensure the keyholder will close the barrier once they have arrived or departed the holiday let?

It must also be remembered that vehicles moving to and from Martello Tower 64 on the North Beach must cross a pedestrian walkway without any traffic control. The concern of residents is that they, and indeed the public who enjoy the beach, will have to watch out for

and navigate cars on the beach. We are confident that the broader population of Eastbourne does not want to see private vehicles start to encroach onto the beaches either.

This serious concern could be resolved if parking for the residents of Martello Tower 64 was limited to the public parking bays on Pacific Drive and surrounding roads. This condition should be included in any planning approval considered. There are some similar concerns with the proposed car parking for Tower 66.

### **Waste removal**

The proposal suggests that all household waste generated will be taken to the nearest designated waste collection points. This is too vague. There are no waste collection points in the vicinity of either Tower. The North Beach doesn't even have litter bins, and we respectfully remind the council that placing domestic waste in public litter bins is an offence.

Are we really expecting residents and holiday lets to take their domestic waste home with them? While we share the owner's and the architect's desire not to have waste bins outside the Martello Towers, the alternative solutions must be more specific, controllable, and again written into the conditions of any planning approval.

### **Control of the type, length and management of holiday lets.**

Local residents are extremely concerned about using the Towers as holiday lets. Will there be a restriction on the number of lets per year or the number of guests per let? Also, will there be a fixed period when letting the Towers is not allowed, i.e. is the summer letting period to be clearly defined?

It must be appreciated that holiday lets can and do become anti-social and a residential blight if used as party venues and other large social gatherings. Whilst we respect and value the owners' assurances the Towers will only be used by family and selected paying guests, there is no enduring or independent control over this situation. Should the owner choose to expand the holiday let business or sell the Towers, residents will depend on a subsequent owner's or remote investor's goodwill. It is preferable the change to residential use is restricted to the owner/occupier alone or that specific, defined and binding conditions relating to the use of holiday lets be incorporated into the application.

### **Loss of privacy**

In relation to Tower 64 on the North Beach, the addition of circular top-floor windows creating a 360-degree view will intrude on the privacy of the flats directly behind the Tower on Caroline Way, as the residents of the Tower will have direct sight into their bedrooms and living rooms.

This situation could be resolved by reducing the glass windows and creating a 180-degree view out to sea and along the coastline. A 360-degree inland view adds no legitimate interest or value, as the back of the Martello Tower overlooks only residential apartments. The same situation may arise with Tower 66 in the South Harbour as the 360-degree view may impact residents' privacy in the new care home development due to be built on Martinique Way.

### **Security Lights**

Again, privacy and disturbance concerns, there is no detail surrounding the use of security lighting around the Towers. Will they illuminate every time a pedestrian, resident or animal walks past? This will create light pollution and disturbance to residences along Caroline Way

### **Ecology report**

We note that the ecology report presented with the application is more than two years old and may be out of date. We respectfully request that this matter be investigated and, if necessary, an up-to-date ecology report commissioned.

In closing, we would again reiterate that most residents favour the sympathetic development and preservation of the Martello Towers. However, there are valid concerns and objections to aspects of this development, and we trust you will consider these issues, understand the residents' concerns, and refuse permission for this development in its current form.

Yours faithfully,

*Dave Rogers*

Dave Rogers

Deputy Chair

Sovereign Harbour Residents Association

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