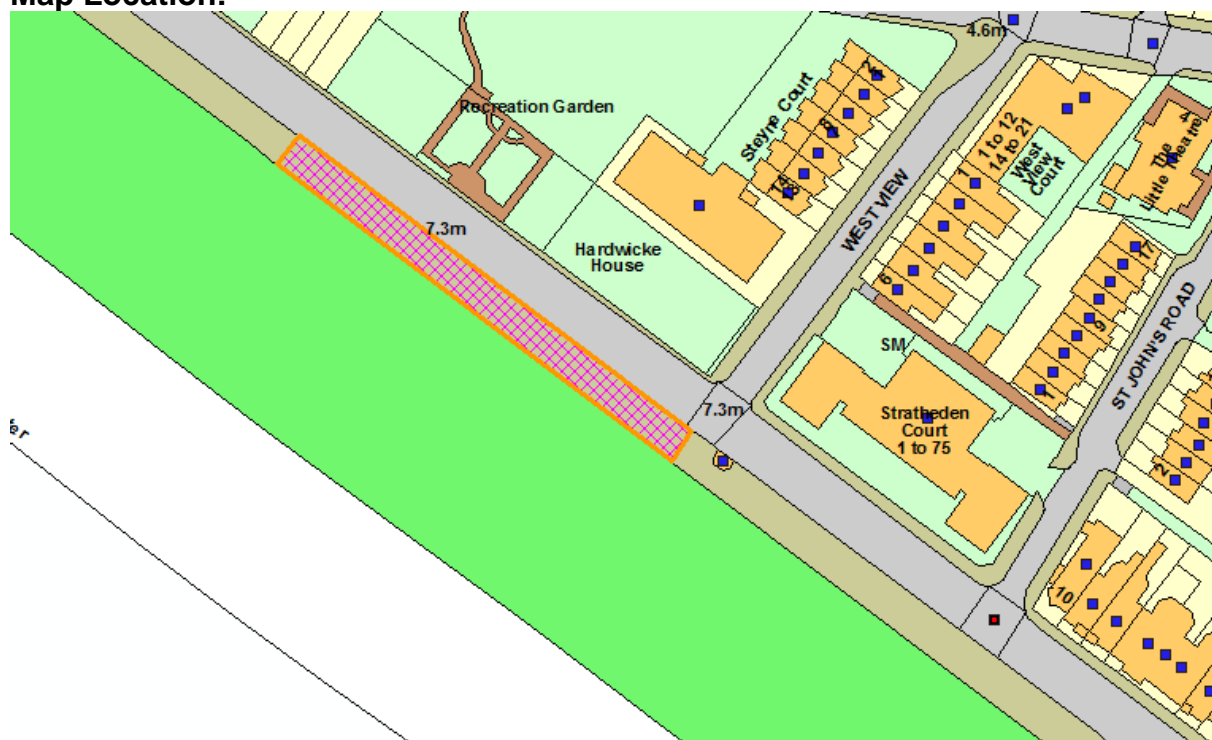


Report to: Planning Applications Committee
Date: 10 March 2021
Application No: LW/20/0166
Location: Area of Seafront Promenade opposite Hardwicke House, West View and Sunken Gardens, Esplanade, Seaford
Proposal: Part-retrospective application for the erection of 8 non-habitable beach huts and 3 toilets (in situ April-September inclusive); and the retention of 4 concession huts (1 permanent, 3 in situ April-September inclusive) at the Esplanade, Seaford.

Ward: Seaford Central
Applicant: Ms I Moulard
Recommendation: Approve subject to conditions.
Contact Officer: **Name:** James Smith
E-mail: james.smith@lewes-eastbourne.gov.uk

Map Location:



1. Executive Summary

- 1.1 The proposed beach huts would enhance visitor facilities and support the local economy and, by this virtue, coastal regeneration.
- 1.2 The siting of the huts would not cause an unacceptable obstruction to pedestrians using the promenade and the ability to remove and/or reposition the huts would ensure their presence would not compromise regular maintenance of coastal flood defences.

2. **Relevant Planning Policies**

2.1 National Planning Policy Framework 2019

- 2. Achieving sustainable development
- 4. Decision making
- 6. Building a strong, competitive economy
- 8. Promoting healthy and safe communities
- 11. Making effective use of land
- 12. Achieving well-designed places
- 14. Meeting the challenge of climate change, flooding and coastal change

2.2 Lewes District Local Plan (Parts 1 and 2)

LDLP: – CP4 – Economic Development and Regeneration

LDLP: – CP5 – The Visitor Economy

LDLP: – CP10 – Natural Environment and Landscape;

LDLP: – CP11 – Built and Historic Environment & Design

LDLP: – CP12 – Flood Risk, Coastal Erosion and Drainage

LDLP: – DM1 – Planning Boundary

LDLP: – DM20 – Pollution Management

LDLP: – DM23 – Noise

LDLP: – DM25 – Design

LDLP: – DM35 – Footpath, Cycle and Bridleway Network

2.3 Seaford Neighbourhood Plan

SNP: – SEA2 – Design

SNP: – SEA6 – Development on the Seafront

3. **Site Description**

- 3.1 The site comprises a section of the hard surfaced raised promenade that flanks the shingle beach at Seaford seafront. A low concrete wall flanks the northern edge of the boundary, behind which runs the Esplanade, a road that connects with the A259 at Bishopstone to the north-west and extends to the public footpath which provides access to the cliffs at Splash Point to the south-east. The northern side of the road is bordered by mixed residential development, primarily on the form of 5-7 storey blocks of flats with occasional groups of dwellings. The promenade itself is relatively wide and free from additional structures save for regularly spaced bench seating.
- 3.2 The beach huts that are subject of this application were, at the time of the site visit, in position towards the northern edge of the promenade. They are painted timber shed type structures that are stationed on low timber platforms.
- 3.3 The site is located within the planning boundary and is part of the Seaford Seafront area is designated within the Seaford Neighbourhood Plan. The site

is at risk of tidal inundation and therefore falls within Environment Agency Flood Zone 3. It is opposite a small public recreation area. There are no other specific planning designations or constraints attached to the site or the immediate surrounding area.

4. **Proposed Development**

- 4.1 The proposal seeks permission for the stationing of 8 x beach huts, 3 x toilet facilities and 3 x concession huts on the site each year between April and September inclusive. In addition, permission is being sought for the permanent stationing of 1 x concession hut. The beach huts would be positioned close to the southern edge of the promenade, overlooking the beach whilst the other huts would be set back adjacent to the low wall flanking the northern side of the promenade. The huts would be distributed along an approx. 85 metre section of the promenade.
- 4.2 The beach huts would not provide accommodation and would be for day use only. 7 of the huts measure 2.1 metres in width by 2.4 metres in depth and 2.4 metres in height. 1 x marginally wider hut (2.12 metres in width) would be provided as a wheelchair accessible facility.
- 4.3 The proposed toilet facilities would consist of portaloos placed inside a timber hut. 2 of the units would measure 1.5 metres in width by 2.4 metres in depth and 2.8 metres in height. A wheelchair accessible unit measuring 2 metres in width by 2.4 metres in depth and 2.9 metres in height would also be provided.
- 4.4 Each unit would be positioned on a low timber platform that is screwed directly onto the concrete promenade.

5. **Relevant Planning History**

- 5.1 No relevant history attached to the site. It is noted that the application is part retrospective and that huts have been in place for periods during 2019 and 2020.

6. **Consultations**

- 6.1 External Consultations:

ENVIRONMENT AGENCY

No objection subject to a condition regarding compliance with the submitted Flood Risk Assessment (FRA).

The Environment Agency's annual Seaford beach recycling work typically runs until the 31st March each year, and sometimes runs later if the beach has been significantly storm damaged over the winter period. Storms are increasing in frequency due to the impacts of climate change. Installation of temporary structures before 1st April is likely to clash with our works in this regard, which has potential to cause difficulties and delays to the completion of our works which are vital for continuing flood protection. We are concerned about multiple contractors working in close proximity, and the subsequent need for all to address risk assessments and construction method statements accordingly.

The recommended condition specifies that construction of the temporary structures cannot begin until 15th April, which would allow us a buffer should our works require additional time. However, it is possible that the temporary structures could be erected earlier if our works are able to be completed in a timely manner if significant storm damage has not occurred over the winter. To that end, the council could contact us in early to mid-March each year to confirm if the temporary structures could be installed earlier and agree an earlier timeframe, which could be confirmed by email. The council can contact us about this by telephoning our National Customer Contact Centre on 03708 506 506 (Monday to Friday 8am to 6pm) and asking to be put through to someone in the 'Solent and South Downs Ouse and Pevensy Asset Performance Team'.

The permanent structures need to be located towards the back of the promenade so that they do not create an obstruction to the recycling haul route. This is because we haul shingle from the southeast and northwest extents of the beach and replenish the eroded central section of the frontage. The haul road is the beach crest and this can become narrow in places due to erosion. When this occurs, the trucks have to run along the back/landward edge of the beach, close to the concrete promenade (old sea wall). Therefore, the two permanent structures need to be sufficiently set back.

Advice to the Local Planning Authority and Applicant

Sea wall

The sea wall at the back of the beach is a key defence structure, reducing flood risk to the town alongside the beach recycling works undertaken by us. It is a concern that the situation of a permanent kiosk and toilet at the back of the promenade against the sea wall will restrict access to the wall to undertake essential inspection and maintenance works.

This structure is owned and maintained by East Sussex County Council (ESCC), therefore we strongly advise that they should be able to make comments on the proposal, and consider the requirement for maintenance access to the wall. The wall is a secondary line of sea defence, and whilst not the Environment Agency's to maintain, we need to ensure that it can be maintained.

If a permanent concession kiosk/toilet must be installed, we suggest the structure should be designed in such a way that in the event of required repairs to the ESCC flood wall, the structure(s) can simply be lifted onto a Hiab lorry and temporarily removed from the promenade whilst the repair is undertaken. This would hopefully be an acceptable compromise for all parties.

Location of the structures

It must also be noted that any permanent structure(s) will effectively be located between two sea defences (the shingle beach and the sea wall) and could be subjected to direct wave action, airborne shingle and flooding. The Environment Agency cannot be held liable for any damage incurred to the structures as a result of the sea/coastal processes. This is particularly a concern with the toilet, which currently appears to be a lightweight portaloo structure within a wooden hut. This could be washed onto the beach in storm

conditions and present a health and safety hazard to beach users, and an environmental/pollution risk from any chemicals/waste within. Ideally, we would not want to see a 'permanent' toilet or concession kiosk at this location.

The future of our beach works

Use of the word 'permanent' should perhaps be clarified, in that it is only permanent as long as the beach continues to be managed as it is at present (i.e. a shingle sea defence). Funding for the Seaford sea defence is secured until 2023, but future funding is unconfirmed and may change over time. For example, climate change and sea level rise may mean that a new flood wall would need to be constructed along the line of the proposed permanent structure(s), or that the methods used to continue maintenance of the beach may change. Therefore, from a medium to long-term perspective, any structures installed now - whether temporary or permanent - may need to be moved in future to allow for any changes to the on-going management of the Seaford frontage.

ESCC HIGHWAYS

If any huts were placed adjacent to the wave wall we would require a 1 metre gap, which would allow us to inspect the wall or ability to lift huts out of the way using crane lorry as per Environment Agency comments above.

7. Neighbour Representations

7.1 Letters of objection

7.2 Objection letters have been received from 36 individuals. A petition of objection with 189 signatories has also been received. A summary of objections made is provided below:-

- Will cause overcrowding and prevent social distancing;
- Will generate noise and cooking smells;
- There are already two cafes and toilets nearby;
- Should be relocated to Bonningstedt area
- Would result in loss of sea views;
- Will cause hazard to pedestrians;
- Beach hut users take over the promenade;
- Huts are large and garish;
- Will lead to conflict between people on promenade and users of facilities;
- Would result in increased traffic;
- Would compromise the quiet character of the seafront environment;
- Toilets generate unpleasant smells when being emptied;
- Hazard of toilet doors opening directly onto promenade;

- Would create feeling of loss of space;
- Huts have attracted anti-social behaviour in the past;
- Toilets close to the café present hygiene concerns;
- Beach huts have been in use late at night;
- Will result in litter and pollution of the beach;
- Creates segregation between visitors to the beach and locals;
- Use of the huts is not policed;
- Too many huts and in the wrong place;
- There is ample room available on the beach for large groups;
- The small gap maintained between the road wall and the back of the huts would create a hazard;
- Support the concession huts but the toilets and each huts would cause congestion;
- No facilities for sanitary product and nappy disposal is available;
- The site address is incorrect;
- Commercialisation of seafront;
- Would be first thing people see when arriving at Seaford by train;

7.3 Letters of support have been received from 28 individuals. Comments provided are summarised below:

- The beach huts enhance the seafront;
- Bring income into the town;
- Great facility for local small businesses;
- Will bring tourists and activity to the area;
- Will support the town centre, which is struggling;
- Would cause no obstruction to promenade if properly used;
- A local nursery was able to use a hut as a beach school last year;
- Provides important facilities for small businesses as shops are too expensive for a sole trader;
- Provide valuable income for town council;
- Provides a natural barrier to slow down cyclists;
- There would still be large gatherings on the beach if the huts weren't there;
- The promenade is wide enough so there is no obstruction;

7.4 Officer Response to public representations:

7.4.1 Although the impact on the wider character of an area is a material planning matter, rights to a private view are not subject to any protection under planning legislation. A number of comments relating to pollution and anti-social behaviour can be addressed through the adoption of a suitable management plan. It is also noted that control of pollution and anti-social behaviour is subject to additional controls under Environmental Health legislation and policing. It is agreed that the site address that the application was registered under is incorrect and this has been rectified. All other material planning matters raised are addressed within the main body of this report.

8. **Appraisal**

8.1 Key Considerations

8.1.1 The main considerations relate to the principle of the use; the impact upon the character and appearance of the area and neighbour amenities, impacts upon highway/pedestrian safety and flood risk.

8.2 Principle of the proposed use

8.2.1 The site is located within the planning boundary where the principle of new development is accepted provided it complies with relevant policies within the development plan as per policy DM1 of the Lewes District Local Plan Part 2. Policy DM25 of the Lewes District Local Plan part 2 supports well designed development that is sympathetic to the character of the surrounding area, space and functionality and environmental and residential amenity. This is echoed on sections 8 and 12 of the Revised National Planning Policy Framework.

8.2.2 Policies CP4 and CP5 of the Lewes District Local Plan part 1 identify the promotion of sustainable tourism and visitor facilities as a vehicle to achieve economic development and regeneration. CP4 identifies coastal towns as a focal point for regeneration.

8.2.3 The site also falls within the seafront area is defined in the Seaford Neighbourhood Plan. Policy SEA6 of the Neighbourhood Plan sets out a number of criteria to be applied when assessing development within the seafront area. Of particular relevance to the current application is criterion A 'development should not detract from the natural, open, un-commercialised environment of the Seafront;' criterion C 'development should be low density and low rise so it does not impact significantly on the spatial or visual openness or attractiveness of the Seafront and its vistas and respects the setting of and views to and from the South Downs National Park, the Heritage Coast, the shoreline and the Seaford Head Gateways,' criterion E 'development should conserve and enhance the amenity use of the seafront;' and criterion F 'development should take opportunities to enhance the public realm and improve walking and cycling facilities.'

8.2.4 The site falls within Flood Zone 3 and, as such, it is important to take into account the use of the buildings and the vulnerability of that use

to flooding as well as potential negative impact upon flood risk in the surrounding area as per para. 163 of the Revised National Planning Policy Framework.

- 8.2.5 The proposed development will therefore be assessed on the balance of its economic, social and environmental merits in full accordance with the principle of supporting sustainable development as set out in paras 8, 11 and 12 of the Revised National Planning Policy Framework.

8.3 Impact on the character and appearance of the area

- 8.3.1 The proposed beach, toilet and concession huts would be positioned on Seaford Promenade, a wide raised concrete platform that flanks the beach and is used by pedestrians. The promenade is largely undeveloped, with the only permanent structures being regularly spaced benches and occasional signs and waste bins. The minimal amount of development combined with the open and gently sloping nature of seafront ensures that there are wide ranging views available out to sea as well as towards Splash Point and Newhaven to the east and west respectively.
- 8.3.2 It is considered that the proposed huts are of a modest scale and would therefore not appear visually disruptive or overly dominant. The huts would be of similar design arranged in regularly spaced groups, allowing for space for views to permeate between them whilst ensuring a sense of uniformity that would prevent a sense of visual clutter from arising. They would occupy a relatively short section of the promenade and it is therefore considered that they would represent a small and unobtrusive portion of the overall panorama offered from the promenade as well as views towards it from the beach and The Esplanade. It is also considered that timber beach huts are a commonplace and expected presence within a seafront environment, particularly when it is immediately adjacent to a town environment as is the case with the current application.
- 8.3.3 The means of fixing the huts to the promenade, through use of timber platforms that are screwed directly into the concrete surface, would ensure that the huts can be removed and replaced with minimal disruption and risk of damage to the surface. It is therefore considered that, when the huts are not in place, the site would be restored effectively to its original appearance.
- 8.3.4 The applicant has stated that all huts are subject to a management and maintenance plan including regular inspection for damage during the course of their use. A programme of inspection, repainting and repair work would also be carried out each year when the huts are disassembled. Huts would be cleaned between uses and kept locked and secure when not in use. Small bins would be provided with each hut and users would be encouraged to take rubbish home with them. It is considered that the following of this maintenance and management programme will ensure the upkeep of the structures and prevent them deteriorating in quality and thereby harming visual amenity. The security arrangements and regular maintenance would also help discourage anti-social behaviour around the huts. It is also

noted that the huts are in an area where there is street lighting and good levels of surveillance, which should act as a deterrent to anti-social behaviour.

- 8.3.5 The use of huts as shelter/storage facilities for visitors to the seafront is considered to be entirely consistent with the established character of the area, with the beach and promenade in sustained use as amenity features. The huts would encourage visitors to spend extended amounts of time at the beach, improving accessibility to this amenity feature and supporting nearby businesses with trade. The provision of toilets would further encourage extended visits and also discourage fouling of the beach and nearby areas.
- 8.3.6 The concession huts would be used to support non-food seasonal businesses that would provide souvenirs and beach wear/equipment for visitors. The modest size of these units would ensure these uses are not overly intensive and, again, it is considered these uses are entirely compatible with the town seafront environment.
- 8.3.7 Planning conditions will be used to ensure that the huts are used as overnight accommodation as this would compromise the night time tranquillity of the seafront. The use of the concession huts would also be restricted to non-food enterprises in order to minimise potential for unacceptable odour emissions or generation of waste. The toilet facilities would be emptied once a week and cleaned twice a week, ensuring that effluent and waste is managed in an appropriate way that would preserve the environmental amenity of the surrounding area. All but one of the huts would be removed outside of the main tourist season ensuring that there would be no sustained presence of out of use and locked up huts, which would have the potential to degrade the visual quality of the seafront and generate an oppressive atmosphere.
- 8.3.8 It is therefore considered that the proposed development is in accordance with policy DM25 of the Lewes District Local Plan part 2 and policy SEA6 of the Seaford Neighbourhood Plan.

8.4 Economic Impact:

- 8.4.1 As set out above, it is considered that the proposed development would improve visitor facilities on Seaford seafront, attracting visitors who would spend an extended amount of time in the locality and would therefore contribute to the local economy and the overall regeneration of the area by increasing footfall and use of local businesses, including small enterprises that would be supported by the provision of concession huts that would not be overly costly to rent and are in a high footfall location.
- 8.4.2 It is therefore considered that the proposed development is consistent with the aims and objectives of policies CP4 and CP5 of the Lewes District Local Plan part one.

8.5 Impact upon Amenities of Neighbouring Residents

- 8.5.1 The proposed huts would be sited in a busy seafront environment. They would provide enhanced facilities for visitors but would not

generate an increase in activity on the seafront that would be disruptive due to their modest scale and the type of facilities that they would provide. The huts are also of modest scale in terms of height and overall footprint.

- 8.5.2 The nearest residential properties are on the opposite side of The Esplanade and, given the observations above, it is not considered that the proposed development would result in any unacceptable harm to the amenities currently enjoyed by these residents.

8.6 Parking and access

- 8.6.1 The proposed huts would be used primarily by visitors to the beach. It is considered that existing public parking facilities have sufficient capacity to support any uplift in visitor numbers brought about by the development.
- 8.6.2 The huts would be positioned on an existing footpath and would result in an approx. 85 metre stretch of it being narrowed. They would be uniformly positioned so as to minimise the potential for obstruction and confusion. The promenade in this location is wide and a minimum of approx. 4.2 to 4.8 metres width of footpath would be maintained adjacent to them. Section 3.1 of the Government's Inclusive Mobility Guidance (2005) states that a width of 3.5 to 4.5 metres to the front of shops is a suitable width to allow movement of pedestrians, including wheelchair users passing each other. The proposed uses would not be as intensive as a shop use but, in any case, the retained footpath width meets with this requirement. This also applies if the concession buildings and toilets are stepped in from the wave wall by 1 metre, as requested by ESCC, as a width of 3.8 to 4 metres would be retained.
- 8.6.3 It is noted that ESCC Highways have not raised any objection in regards to impact upon pedestrian accessibility and safety or the functionality of the footpath.
- 8.6.4 A condition will be used to require the doors of the toilet huts to open to the side in order to prevent them opening onto the main part of the promenade where there is the potential for pedestrians to collide with the doors. Beach huts would face out towards the beach rather than onto the promenade, addressing concerns that paraphernalia associated with their use would cause further obstruction on the promenade.
- 8.6.5 It is therefore considered that the proposed use would not result in unacceptable parking stress on the surrounding highway network nor would it impede of accessibility for pedestrians using the promenade.

8.7 Flood Risk

- 8.7.1 The use of the huts is regarded as less vulnerable to flooding as per para. 066 of the Planning Practice Guidance for Flood Risk and Coastal Change. The buildings would not be occupied overnight or provide any form of permanent accommodation.
- 8.7.2 The Environment Agency utilise the promenade when carrying out beach recycling work, which typically runs until 31st March of any

given year. The Environment Agency is satisfied that the temporary huts would not be in position when beach recycling works are being carried out and so would not form an obstruction. The permanent huts would be set well back from the beach where they would not obstruct access.

- 8.7.3 ESCC Highways have also confirmed that they require a minimum of 1 metre separation between the huts and the wave wall on the northern side of the promenade in order to allow for maintenance and inspection works to be carried out on this wall, which forms part of Seaford's flood defences. Whilst the huts would be pushed back against the wall, they would be able to be lifted out by a crane lorry if maintenance works are to be carried out whilst they are in place. The permanent huts should also be fixed in a way that would allow easy removal by a hiab (crane) lorry in the event that works need to be carried out on the wall.

9. **Human Rights Implications**

- 9.1 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 taken into account fully in balancing the planning issues; and furthermore the proposals will not result in any breach of the Equalities Act 2010.

10. **Recommendation**

- 10.1 It is recommended that permission is granted subject to the conditions listed below.

10.2 Conditions

1. At no time must the beach huts be used as overnight sleeping accommodation.

Reason: In order to control the use of the development in the interest of environmental and residential amenity and the character of the surrounding area in accordance with policy CP11 of the Lewes District Local Plan part 1, policy DM25 of the Lewes District Local Plan part 2 and policy SEA6 of the Seaford Neighbourhood Plan.

2. With the exception of 1 x concession hut, the structures hereby approved shall be removed, and the site restored to its prior condition for the duration of the period between 30th September and 15th April.

Reason: In order to ensure structures are removed when not in regular use in the interest of visual amenity in accordance with policy CP11 of the Lewes District Local Plan part 1, policy DM25 of the Lewes District Local Plan part 2 and policy SEA6 of the Seaford Neighbourhood Plan.

3. Prior to installation of any beach huts and toilet facilities, a management and maintenance plan setting out full details of booking arrangements, hours of use, waste storage and removal, effluent management, cleaning regimes and security arrangements shall be submitted to and approved by the Local Planning Authority.

Reason: In order to ensure that the huts are maintained in an acceptable condition and that potential impacts upon amenity are suitably managed in accordance with policy CP11 of the Lewes District Local Plan part 1, policies DM20, DM23 and DM25 of the Lewes District Local Plan part 2 and policy SEA6 of the Seaford Neighbourhood Plan.

4. The concession huts shall be used for non-food retail purposes only. No other use shall be undertaken unless agreed in writing with the Local Planning Authority.

Reason: In order to ensure availability for small enterprises and to prevent the establishment of a use with the potential to generate significant noise and air emissions in accordance with policy CP11 of the Lewes District Local Plan part 1, policies DM20, DM23 and DM25 of the Lewes District Local Plan part 2 and policy SEA6 of the Seaford Neighbourhood Plan.

5. The toilet facilities shall be orientated to as to have their doors opening to the side and not directly onto the main are of the promenade. The doors of the beach hut shall open towards the beach.

Reason: To ensure inspections and maintenance can be carried out on the flood defence in accordance with para. 163 of the Revised National Planning Policy Framework and in accordance with pedestrian safety and accessibility in accordance with policy DM25 and DM35 of the Lewes District Local Plan part 2, policy SEA6 of the Seaford Neighbourhood Plan and paras 91 and 106 of the Revised National Planning Policy Framework.

6. The development shall be carried out in accordance with the submitted Flood Risk Assessment (dated 5 August 2020, by Geoff Johnson, Planning Officer, Seaford Town Council) and shall also comply with the following mitigation measures:

- The temporary structures hereby permitted (8 non-habitable beach huts, 4 concession kiosks and 3 toilet huts) can only be constructed and installed within the site boundary identified in the submitted plan (entitled 'Proposed Hut Locations') from 15th April each year (unless otherwise agreed in writing with the Environment Agency), and shall be removed in their entirety by 9th October each year.
- The permanent structures hereby permitted (1 concession kiosk and 1 toilet hut) can remain in place throughout the year, but shall be located towards the back of the promenade (landward side) at all times so that they do not cause an obstruction to the recycling haul road.

All permanent structures hereby approved shall be designed in such a way that in the event of required repairs to the ESCC flood wall, the structure(s) can be lifted onto a Hiab lorry and temporarily removed from the promenade whilst the repair is undertaken.

Reason: In order to ensure flood defences can be maintained to an acceptable standard in accordance with policy CP12 of the Lewes

District Local Plan part 1 and para. 163 of the Revised National Planning Policy Framework

Informatives

1. Seaford beach is a designated sea defence structure, maintained by the Environment Agency. A Flood Risk Activity Permit from us will be required for any works (temporary or otherwise) taking place on or within 16 metres of this defence structure.

The Applicant should note that a permit is separate to and in addition to any planning permission granted. The granting of planning permission does not necessarily lead to the granting of a permit.

To enquire about the permit application process, the Applicant should contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk. We would advise the Applicant to consult with us about a starting their application at the earliest opportunity.

2. The Local Planning Authority has acted positively and proactively in determining this application by engaging with stakeholders, visiting an existing business site to get a better understanding of the operation, identifying matters of concern and negotiating acceptable amendments. As a result, the Local Planning Authority has been able to grant planning permission for an acceptable proposal, in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.
3. The development hereby permitted shall be carried out in accordance with the following approved drawings:

PLAN TYPE	DATE RECEIVED	REFERENCE
Location Plan	15/9/20	
Proposed Hut Locations	15/9/20	
Concession Hut	15/9/20	
Porta WC Hut	15/9/20	
Standard Beach Hut	15/9/20	
Platform Detail	15/9/20	
Wheelchair Accessible Beach Hut	15/9/20	

Reason: For the avoidance of doubt and in the interests of proper planning.

11. **Background Papers**

- 11.1 None.