

APPENDIX 20

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Retreat Farm, La Rue de la Frontiere, St Lawrence/St Mary (P/2017/1023)

Demolish glasshouse and ancillary structures in Field 770. Construct 13 No. two bed and 14 No. three bed self-catering accommodation units and ancillary structures with associated hard and soft landscaping. Change of use of resulting agricultural field to car park, including hardstanding and associated works. Widen La Rue de la Frontiere and alter vehicular access. Construct bus shelter and form footpath to South-West of site. Construct terraced seating area to North of existing café. 3D model available.

Car Park and Field L78, Retreat Farm, La Rue des Varvots, St Lawrence (P/2017/0805)

Demolish glasshouses to Field No. L78. Alter vehicular access onto La Rue de la Frontiere. Construct 1 No. four bedroom single storey house, detached three car garage and swimming pool to car park South of Field L78 with associated landscaping and parking. 3D MODEL AVAILABLE

I write in response to the 46 letters of objection received in respect of planning application P/2017/1023 and the 41 letters of objection received in respect of planning application P/2017/0805.

Firstly, the Minister has required the submission of an Environmental Impact Assessment to accompany the application P/2017/1023 and, also, he will be referring both applications to a Public Inquiry. This has resulted in a re-assessment of the two applications including all the representations submitted in response to the application. Consequently revised plans have been submitted together with the following up-dated reports: Planning Statement, Economic Statement, Crime Impact Assessment, Heritage Assessment and Design Guide, and which have addressed many of the concerns.

Of particular significance in this regard is an undertaking by the applicant, which we anticipate will be secured by a Planning Obligation Agreement, agreeing to the use of the land being exclusively for tourism use and, in the event of this use falling into disuse or disrepair, the land will be restored to open agricultural land. This represents a significant improvement on the existing situation in that the 4.5 acre western block of glass has no such restriction. This undertaking should allay the fears raised by many objectors that this application is a stepping-stone for residential development. It is not.

Secondly, because the Minister has decided to call a Public Inquiry to deal principally with application P/2017/1023, but also to include application P/2017/0805, this means it will effectively be dealt with as one application.

I will therefore respond to the representations accordingly.

The proposal is to demolish both glasshouse blocks on the two sites which together measure 27,019sqm. The western block is the larger of the two measuring 18,182sqm and the eastern block measures 8,837sqm. The western block was approved by two separate applications, the northern half in 1975 under reference 3199/I and the southern half in 1979 under reference 319/K. These permits had no restrictions placed on them. The eastern block was approved in 1995 under reference 3199/PA.

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Condition 4 on this permit states "should the glasshouses fall into disuse or disrepair they shall be removed from the site and the land restored to agricultural use."

The proposal is to replace all the existing glass with 27 self-catering units and ancillary structures (measuring a total of 2,352sqm), a 168 space car park and a single dwelling house (457sqm) with the eastern block of glass returned into a 2.2 acre open agricultural field. The existing Tamba Park car park off La Rue des Varvots will be extinguished and this established tourist attraction will rely on the new 168 space car park described above, and the overspill car park that already has permission (P/2016/0503), both accessed via the same access off La Rue de la Frontiere.

As we have acknowledged in our case, there are policies that pull against the proposal and these are policies SP1, SP4, NE7, ERE1 and ERE7, albeit they are caveated to allow development. For instance, Policy NE7(11) makes provision for new tourism development. However, there are also policies that pull in favour of the proposal which are SP1, SP5, E1 and EVE1. Therefore, a careful balancing of these considerations need to be achieved and it is our view that the balance falls in favour of the proposal.

The reason I consider balance is weighed in favour of the proposal is because Policy EVE1 is the pivotal policy for the self-catering proposal because although it recognises that for proposals in the Green Zone, the Green Zone Policy will apply (ie Policy NE7(11 which allows new tourism development)), the preamble to the policy gives a number of reasons why tourism development may be permitted. These are by stating the following:

- 1) *The Minister also recognises the dilemma between policies to protect and enhance the coasts and countryside and policies which seek to facilitate developments in the tourism industry to enable visitors to enjoy our unique environment. That dilemma can be resolved within the policies set out if the proposals for new tourist related accommodation recognise the sensitivity of the areas covered by policies for the countryside.*
- 2) *The ability of an existing attraction to upgrade, re-invent itself or extend its operation is important to the continued viability of that attraction and the overall success of the visitor destination.*
- 3) *The Minister will consider proposals for new or extended tourism and cultural attractions in accordance with the advice appropriate to the zoning of the site. Where there is a presumption against development, the Minister will require clear evidence of the benefits of the proposals and how the development will enhance, or mitigate, the impact of the location.*

Firstly, we need to look at the "sensitivity of the area." Presently, most of the site is covered with the largest glasshouse blocks (27,019sqm) in the island with large expanses of concrete yards (internal and external) and a history of causing problems for neighbours, hardly a sensitive baseline. Together the self-catering units, ancillary structures and the new dwelling amount to 2,809sqm. This represents an 89.6% reduction of built floorspace on the site and which is an improved response to the sensitivity of the site given the removal of acres glass and hard surfacing and replaced by permeable surfaces and a well-considered landscaping scheme introducing a significant amount of planting. Additional to this, the whole of the eastern block of glass is returned to an open agricultural field which is much more sensitive than the existing block of glass. The proposal will also see a reduction in the intensity of use of the site, mindful that its recent past saw up to 400 persons employed on the site generating up to 10 HGV vehicles a day delivering imported flowers from the ports and delivering the finished product back to the ports for export to the UK. At peak times the operation would be run 24 hours a day resulting in the packing station and external yards having to be lit and causing vibration which generated numerous neighbour complaints.

Tamba Park, within 3 years of opening is probably already the most successful tourist attraction in the Island and in 2016 attracted 200,000 visitors through its doors. After 2 decades of decline in the tourism industry with the loss 14,400 bed spaces since 1992 with only 10,600 remaining in 2016 (a 57.6% reduction), but with evidence of recovery in each of the last 4 years in the number of staying visitors

from 325,000 in 2013 to 352,000 in 2016, any opportunity to improve the bed stock in appropriate locations should not be dismissed lightly. Given that Tamba Park is contiguous with the glasshouse blocks and even subdividing them, it makes eminent sense for this attraction to further upgrade, re-invent itself and extend by redeveloping the redundant glasshouses as a modest-sized holiday village. Moreover, having regard to the self-catering component the cost of demolition of the western block of glass and developing the self-catering units and ancillary structures would be circa £4.2m which is commensurate with the value of the development deemed to be circa £4.75m (see Power Surveying Ltd report) and which also causes it to comply with Policy ERE7.

The proposal will give rise to significant benefits. The proposed development will result in an 89.6% reduction in built floorspace, a reduction in intensity of use, remediation of soil contamination, a replacement of hard surfaces with permeable surfaces together with significant soft landscaping within the site and on its edges, replacement of a site with low ecological value with a development of much improved ecological value and, finally, re-direction of significant traffic from a narrow rural lane to a primary distributor road.

The proposed 168 space car parking area would also comply with Policy EVE1 and EVE3 (Tourism support facilities in the countryside) for that matter. It would replace a substantial area of built glass and hardstanding with open, landscaped and a permeable surface with land drains directing the surface water to the amenity lake, which is one of the recreational features of Tamba Park.

With regard to the new dwelling, again it is acknowledged that Policy NE7 presumes against the redevelopment of glasshouses and Policy ERE7 only allows redevelopment of glasshouses to a non-employment use if the disuse and disrepair condition is absent. However, this is no ordinary glasshouse in Jersey in terms of its size and the extent of its ancillary fixtures and fittings which cost circa £2m (at today's prices) when it was built in the mid 1990's. Given the cost of its removal and restoring the land back to an open agricultural field (£320,000), with the resulting field then having a value of only circa £15,000. The viability of returning these glasshouses to agriculture without some form of economic return delivered by another part of the scheme is difficult to envisage or achieve. Therefore, the total cost of developing the house would be between £1.25m and £1.6m (see Power Surveying Ltd) which is commensurate with the value of the house set at circa £1.5m by Gaudin & Co. Ltd.

Moreover, the whole area of the eastern block of glass would be returned to an useable agricultural field and the new dwelling would be sited on the existing Tamba Park car park which is a better location by virtue of being already developed land and adjacent to the existing settlement to the west and south.

Other material considerations include protection of employment land, impact on neighbours, intensity of use and transport issues.

Policy E1 presumes against the loss of employment land and Policy ERE7 presumes against the redevelopment of redundant and derelict glasshouses for other uses, unless the alternative use is directly related to agriculture or diversification of agricultural activity. However, Policy ERE7 does go on to say *"in exceptional circumstances, the development of redundant and derelict glasshouse sites may be considered for non-agricultural development provided that the amount of development permitted will be the minimum required to ensure a demonstrable environmental improvement of the site by the removal of the glasshouses and any contaminated material, the reduction in the area of buildings and the repair to the landscape and accords with Policy GD1."*

The glasshouses and associated equipment have been demonstrated to be redundant. Although the requirements for marketing a site in its present or alternative employment uses is only for 3 months, Retreat Farm was professionally marketed (see CBRE Marketing Report) for 18 months and, owing to a lack of interest, the sale and rental prices were reduced, but which still elicited no interest.

The proposed development qualifies as an exceptional circumstance because the glasshouses, owing to their concrete floors are incapable of growing most produce without significant changes and investment in the site. There are a number of reasons why this option is not being pursued:

- a) there is no demand for the glasshouses as currently presented;
- b) the refurbishment of the existing glasshouses to provide a facility that is useable by the agriculture industry is not viable; and,
- c) the Applicant is seeking to enhance the tourism offering provided by the island through the creation of self-catering accommodation immediately adjacent to an existing tourism destination.

The proposal will also result in a significant reduction in built floor area from 27,019sqm to 2,809sqm representing an 89.6% reduction. It will also remediate the contaminated land that has been identified in the Amplus Ltd Geotechnical Investigation Phase II Intrusive Investigation and Risk Assessment. Finally, the reversion of most of the land to open, landscaped areas together with returning the whole of the eastern block of glass to an open agricultural field is a significant repair to the landscape and significantly increase the ecological value of the site. It is therefore on these grounds that the proposal complies with Policy ERE7.

According to the Tamba Park Operational Statement, the proposed holiday village will create a pool of up to 14 new full time jobs and additional part time staff to add to the existing pool of up to 24 full time jobs and 30 part time staff, dependent on the season. It is therefore considered that on these grounds the proposal complies with policies E1 and SP5.

Regarding impact on neighbours, the concerns raised by neighbours have been considered and it is judged that the arrangement of uses proposed together with the relationship that results with neighbours, does not cause unreasonable harm, which is the test set by Policy GD1. However, such is the extent of planting within a buffer zone to the north of the self-catering units, that the holiday village will not be visible to any neighbours and therefore the neighbours would not be visible to the self-catering units. The new dwelling, as a single storey structure set well within its boundaries would also not cause any harm to neighbours. Also, the existing Tamba Car Park which has 75 spaces accessed via a narrow rural lane (la Rue des Varvots) and is busy throughout the day will be closed and all this traffic re-directed to the new 168 space car park off an improved access off La Rue de la Frontiere a primary distributor road. This will be a significant improvement for all the residents who live on La Rue des Varvots.

In terms of intensity of use, the proposed development, together with Tamba Park will be little different if not less to when Retreat Farm was a very successful, packing station and distribution depot with offices occupied telesales operators, administrative offices and management (up to 400 employees). Additional to this there was Jersey Gold and the Lion Park (now Tamba Park) with an ancillary restaurant. Significant trips would have been generated by all the staff working in the nursery, box-making, packing the flowers and distributing the finished product to the ports. Indeed, most of the flowers that were packed were imported (from Columbia) which would have generated even more heavy goods vehicle traffic. Between 2 and 10 P65 (articulated lorries) trips were generated daily, dependent on the time of year.

Finally, the proposal seeks to be sustainable in terms of transport. It includes the formation of 2 new bus stops and a refuge close to the new entrance to Tamba Park. A new pedestrian path will be formed inside Field 772 to ensure safe access to and from the bus stops to and from Tamba Park. There will be measures to promote public transport in the Travel Action Plan.

The proposal, amongst others, will include a dedicated covered rack for 32 bicycles and on-site provision for each self-catering unit. There will be 5 charging points for electric cars, 8 disabled parking spaces, a Tamba Park courtesy bus to pick up customers from St Helier and the Airport, and Tamba Park's own hire bicycles and electric hire cars.

Therefore, notwithstanding that the objectors clearly do not share these views, which is of course their prerogative, having carefully distilled and assessed all the competing policies of the Island Plan and all other material considerations, it is my professional view that a compelling case can be made that the proposals do comply with the Island Plan. However, if for whatever reason it is found that they don't, there is still suitable justification to allow the proposed development as an exception to the Island Plan as provided for by Article 19(3) of the Planning & Building (Jersey) Law 2002.

Finally, a schedule of objections taken from Ogier's letter dated 15th September 2017 is attached and which provides a response to each individual objection. This letter was chosen as it essentially covered all the objections raised in the other letters submitted in response to these applications.

I trust this is satisfactory for your purposes.

Yours sincerely,

A black rectangular redaction box covering the signature of Michael Stein.

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SCHEDULE OF OBJECTIONS (from Ogier's letter dated 15th September which essentially covers all the objections raised by those who have objected).

Objection	Applicant's Response
<p>The site is not a brownfield site.</p>	<p>Under the preamble to Policy SP1, under the section entitled "Brownfield Land" it states <i>"unlike many parts of the UK, Jersey does not have a stock of outworn and vacant industrial land that is ripe for development. what the island does have is a stock of agricultural buildings such as redundant and derelict glasshouse sites, which may help contribute towards the Island's development needs over the Plan period. Not all brownfield land, and in particular, redundant glass will be suitable for redevelopment because of factors of remoteness; distance from services, amenities and transport and sensitive landscape location, and each site will need to be considered on it merits."</i></p> <p>It would therefore seem that redundant glasshouses are Jersey's brownfield sites but it doesn't necessarily follow that all should be developed.</p> <p>However, the baseline situation at Retreat Farm is an unsightly 6.6 acre area of redundant glass with concrete floors inside and outside which have large areas of the building authorised as a packing station and a box making facility. Moreover, the CCA for this site does acknowledge there is some capacity for change especially for sites that are not seen from long distance views, which applies to this site.</p> <p>The significant economic benefits, retention of employment use that will diversify the economy, 89.6% reduction in built floorspace, replaced by mostly open space and heavily landscaped, remediation of soil contamination; connection of the site (authorised to be used by 200 + employees relying on septic tank and soakaway) to the foul sewer and making most of the surfaces permeable represents the significant environmental gains that the Island Plan seeks.</p>
<p>The proposal sets an undesirable precedent</p>	<p>No such thing as precedent. Each application to be considered on its own merits.</p>
<p>Intensification of Use detrimental to character of the Green Zone</p>	<p>The present authorised use as a packing station, box-making facility, telesales and administrative offices and nursery (up to 400 employees), and generating frequent HGV traffic, much more intense.</p>
<p>Existing site is highly suitable for small mammals, birds, roosting bats, commuting and foraging bats</p>	<p>This is a very selective extraction from the Initial Ecological Assessment. The majority of the site on which the glass and concrete hardstandings are located is of low ecological value. The conclusion of the Ecologist is that, once completed, the proposed development will enhance the ecological value of the site.</p>

CCA - limited capacity for change. Any development can have a very high impact on long views that can be obtained from the area.	The CCA does therefore make provision for change and, owing to the existing and established planting on the boundaries of the site and surrounding shelter belts, causes there to be no long distance views of the site. Given the existing development and intensity of use on site, there is therefore capacity for change.
Policy NE7 sets the highest levels of protection	Policy NE7 does not set the highest level of protection. Policy NE6 for the Coastal National Park sets the highest level of protection. In fact Policy NE7 only sets a "general" presumption against development and qualifies this by stating " <i>there is not a moratorium against development and the key test is the capacity of the site and its context to accommodate development without serious harm to landscape character</i> ". It is our view that the site does have capacity for development and which will actually improve landscape character.
How can development be an improvement to an area zoned as greenfield land	This is incorrect. The site is not zoned as greenfield land, it is zoned as Green Zone wherein it is acknowledged there are many buildings and land uses and which is why there needs to be " <i>a reasonable expectation for businesses to undertake economic activity and provide employment, having regard to the capacity of the landscape to accommodate development without serious harm</i> ". The baseline is the existing 6.6 acres of glasshouse approved as a packing station, box making facility, with acres of concrete floors inside and outside.
Allowing the application will threaten its countryside character.	The existing character is more of a quasi- industrial building. It has very little countryside character. The proposal will reduce the built floorspace by 89.6% and result in much more open space that will be sensitively landscaped.
ERE7 only allows alternative uses that are directly related to agriculture	This is incorrect. Provision is made " <i>in exceptional circumstances for non-agricultural development provided the amount of development is the minimum needed to ensure a demonstrable environmental improvement of the site by the removal of the glasshouses and any contaminated material, the reduction on the area of buildings and repair to the landscape</i> ". The proposal brings substantial environmental gains (ie 89.6% reduction in built floorspace; substantial areas of open and landscaped land; remediation of soil contamination; return of 2.2 acres to an open agricultural field; connection to the foul sewer; mostly permeable surfaces to allow surface water to filter through; sustainable transport options introduced and encouraged).
Questioning redundancy of the glasshouses.	Lack of understanding of the glasshouse industry in the island. No mention that there is no longer an active industry in the Island because there isn't one. Since subsidies were removed for the horticultural industry in 2006 and LVCR removed in 2013 virtually all glasshouses have become redundant.
Requested rental is unrealistically high	The rental considered appropriate by CBRE an international land agent, based on professional experience and based on

	previous sales/rentals at a reasonable market rate.
Challenge whether the replacement use will be principally employment use	The self-catering village, the car parking and the open agricultural field are all employment land and represents about 93% of the site area. The replacement use will therefore be principally employment use.
Policy EVE1 does not apply as no clear benefits of the proposal	The preamble to Policy EVE1 does give some encouragement for tourism development in the Green Zone (in accordance with NE7(11) where there are environmental benefits. (ie 89.6% reduction in built floorspace; substantial areas of open and landscaped land; remediation of soil contamination; return of 2.2 acres to an open agricultural field; connection to the foul sewer; mostly permeable surfaces to allow surface water to filter through; sustainable transport options introduced and encouraged).
Light and Noise Pollution	
Noise from Tamba Park	Tamba Park has planning permission (it was previously Lion Park and Jersey Gold tourist attractions) and is subject of a noise condition and a requirement to submit an Acoustic Survey, which has been submitted.
The applicant has transgressed the noise conditions	The applicant is unaware that he has transgressed the noise conditions. There has been no enforcement action taken by the Planning Department against the Park.
White lighting intrusive	The plans have been amended to include a lighting strategy that will minimise the escape of light from the proposed use of the site. Soft lighting will be provided by down lighters. Also, the authorised use as a packing station and nursery used to operate late in the evening, so whole glass could be lit up throughout the night, sometimes 24/7
Shop and gym/games room will increase noise.	The shop and gym are proposed as small ancillary buildings to the primary use of the site as a self-catering facility. The gym is intended to provide a few machines for the use of visitors. The shop will provide a limited range of provisions. Both of these buildings are distant from neighbouring properties. It is suggested that any planning permission be subject to a condition preventing the installation of any externally audible sound equipment. On this basis it is judged that these facilities will not cause unreasonable noise to neighbours. Noise caused by the current authorised uses ie. existing packing station, box making facility, movement of numerous daily HGV vehicles with their reversing alarms would be much noisier.
1-5 Retreat Farm Cottages	A/C units have been relocated further away from where permission was granted under P/2016/0503. Revised plans show additional planting to the boundary. The turning area

	for deliveries has been relocated further north, to avoid HGV or van traffic in this area, resulting in a significant improvement to the amenity of 1-5 Retreat Farm Cottages. Also, additional planting has been proposed on the party boundary.
Electronic Buggies	Do not make noise
Gardens for the self-catering uses	Will make no greater or less noise than gardens usually do, and which therefore would not be unreasonable. However, the closest self-catering garden to a residential property is about 40 metres, a sufficient distance to dissipate noise such that it cannot be regarded as being unreasonable. Moreover, there is a substantial landscaped buffer on the northern edge of the holiday village to reduce impact on residential dwellings in Le Rue de la Prairie, beyond the Tamba Park boundary to the north.
Island Need	Recommendation 16 of the Jersey Destination Plan (JDP) (2016) encourages the development and improvement of Jersey's stock of accommodation to meet visitors' needs mindful that visitor numbers have increased from 325,000 in 2013 to 352,000 in 2016 and predicted to be 389,000 in 2020. The JDP seeks a Planning regime that is responsive to visitor lodging requirements. Notwithstanding this the applicant is happy that if the self-catering units fall into disuse and disrepair the land will be restored to open agricultural land and is willing to enter into a Planning Obligation Agreement to this effect.
Caravan Park not permitted without consent of Chief Officer	The accommodation proposes self-catering lodges (not caravans) and has been chosen to be as sustainable as possible. Its modular construction minimises the need for intrusive construction on site. We are seeking permission of the Minister by way of a formal planning application, that is subject to due process and proper scrutiny, in this case by way of a Public Inquiry
168 car park replacing 75 space car park does not reduce dependency on the car. Bus stops would be a severe hazard Dfl object to design of access Loss of mature trees	A larger car park for the overall increase in the Tamba Park operation is sensible given its increasing popularity and the increase in staying visitors experienced in Jersey since 2013. It will also improve the location of the car park by being served by a main distributor road compared to the existing car park, which is served by a narrow rural lane. Revised plans have been produced to satisfy the Dfl. Revised plans have been produced to satisfy the Dfl. Lost trees replaced by new trees.

Residents of La Rue des Varvots would have extra 150 yards to walk to access their premises	The existing bus stops on the junction of La Rue des Varvots and La Rue de la Frontiere would remain. The 2 new bus stops are therefore additional bus stops, not replacement bus stops
Managers accommodation not for agricultural requirement	The land on which it is proposed is not agricultural. It is a tourist attraction formalised by permit P/2016/0503. Policy H9 makes provision for staff accommodation for key workers particularly important to the island's agriculture and tourism industries.
Existing staff accommodation redeveloped into housing 2012 and 2014	These applications were approved prior to Tamba Park opening and which represents a new planning chapter for the new manager's flat for the authorised tourist attraction. In approving these applications, Planning also accepted the redundancy of the staff accommodation and offices which further reduces the viability of the existing glasshouses.
No doubt the new staff accommodation will be sold off again as residential	This would need to be the subject of a separate application, and which would need to be considered on its own merits. However, the applicant is willing to enter into a POA to ensure the land is restored to agricultural use if the unit falls into disuse or disrepair.
In response to an application for re-zoning the site to housing in 2013 (as Part of Island Plan Review process), the Minister said the site was inappropriate for housing	This is not a proposal for permanent housing. This application is for a modest holiday village that would be contiguous with the holiday attraction Tamba Park, no different to the permissions granted for self-catering in the Green Zone (then termed as Countryside Zone) at Les Ormes which is a sports/leisure centre.
The Minister went on to say "On this basis we would encourage that the entire area should be returned to its original state."	The return of the site to agriculture requires an investment of at least £1m. An investment of this magnitude does not currently provide for a future viable agricultural use of the site.
There is serious pressure on the pump houses (foul sewer) lacking capacity.	<p>In accordance with discussions with the Department for Infrastructure the new holiday village would be connected to a new private storage and pumping station within the north west corner of the application site and this would be pumped up La Rue de la Frontiere to connect to the existing public foul sewer in La Rue des Buttes, St Mary.</p> <p>This would be an improvement on the existing situation of Tamba Park/Glasshouses which is presently connected to the public foul sewer leading to the pumping station in La Rue des Varvots which is understood to be at full capacity.</p> <p>The applicant is also willing to add an additional rising main within La Rue de la Frontiere to the public foul sewer in La Rue des Buttes to potentially alleviate the capacity issues of the public pumping station in La Rue de la Frontiere which is</p>

	also understood to be at full capacity. This has the potential to significantly improve the drainage capacity in the area which would be a significant public benefit and if agreed would be subject to a Planning Obligation Agreement.
Existing car park has subjected neighbours to high levels of flooding.	This car park is authorised by permit P/2016/0503. Overall, there is presently circa 7.5 acres of impermeable land (grass and concrete hardstandings) which results in a significant amount of surface water to dispose of. The proposal will replace this land with permeable surfaces thereby enabling surface water to discharge into the ground and reduce the incidence of flooding. This represents an improvement on the existing situation.
Removal of trees and negative effect to nature	A row of overgrown leylandii trees to the north of Field 772 were removed on the advice of qualified tree surgeon on account of them being dangerous and at the end of their useful lives. Their removal was addressed in the Initial Ecological Assessment for the application (P/2016/0503) that regularised Tamba Park. Leylandii trees also have very little ecological value. The applicant has demonstrated his commitment to trees by the number of trees that are proposed to be planted with the application and which represents a significant improvement on the existing situation.
Numerous houses built in the past have made a profit	<p>Previous applications are not relevant. They were considered acceptable on their own merits. Moreover the loss of staff accommodation and offices has made the existing glasshouses less viable.</p> <p>6.6 acres of glass in total will be removed costing over £1m. Although there is a disuse and disrepair condition on this greenhouse, it is uneconomic to remove this glass without some form of financial input from the site, which will help fund the removal of the glass and restore the land back to agricultural use. In a public announcement made in August 2015, the Minister conceded that more development could be permitted and to incentivise the removal of redundant and derelict glass and restore some of the land back to agricultural use.</p>
Field 772 has had little agricultural use which does not bode well for Field 78.	Field 772 is used by a local farmer (Trevor Barette) to graze his cows. In accordance with the Moveable Structures (Jersey) Law, 2006, the owner may on 28 days (not consecutive) use the site as an overflow car park without the need for planning permission.
National Trust object	That is their prerogative, but it doesn't make them right.
Pattern of behaviour	Is not a material planning consideration.
The landowner aims to develop the whole site into	The applicant is willing to enter into a POA to restore the land to agricultural use in the event the self-catering lodges fall

residential accommodation	into disuse and disrepair. This does not suggest an Applicant who is seeking to develop the whole site for residential accommodation.
The temporary nature of the development will allow them to be easily dismantled to enable a new residential development after a successful application for change of use	To the contrary, the temporary nature of the self-catering lodges means that the land can be more easily restored to agricultural use, because permission for new residential development would be very unlikely to be forthcoming (hence application P/2016/1483 was withdrawn) and, also, because of the POA referred to above that the applicant is willing to enter into.
Comments regarding Public Exhibition misleading	The applicant and architect can only relate what was said to them by attendees at the Public Exhibition.
Roads (particularly a Rue des Varvots) are unsuitable for level of traffic proposed	Presently, the majority of traffic for Tamba Park is via the existing car park off La Rue des Varvots, a narrow rural lane. This car park will be extinguished and replaced by a single dwelling, significantly reducing the level of traffic onto this narrow rural lane. The new car park will be off La Rue de la Frontiere a primary distributor road and, therefore in accordance with Policy GD1.
Plans do not provide sufficient parking for peak time or seasonal staff.	An assessment of transport impacts has identified a peak parking requirement of 123 spaces for the existing use of Tamba Park. The plan proposes an overflow car park with 33 spaces, which additional to the 168 space car park is considered to meet staff and visitor parking requirements. 27 dedicated spaces are provided for self-catering visitors. Moreover, encouragement and facilities are provided to encourage public transport and cycling to reduce the need for car parking.
Other self-catering developments have failed and reverted to residential.	The applicant has given an undertaking that if the application fails the land will be restored to open agricultural land.