



5th January 2017

Mrs A Christine Self MIBMS
Programme Officer
Homefield House
Homefield Road
Saltford
Bristol BS31 3EG

Dear Mrs Self,

Planning Inquiry into Applications for Planning Permission – References P/2017/0805 and P/2017/1023 – Retreat Farm, Jersey

Statement of Case

Please find enclosed the composite Applicant's Statement of Cases for the two Applications for Planning Permission for development proposals at Retreat Farm, Jersey. The Statement presents the case for both Planning Applications and are a little over the 1,500 words for each whilst avoiding duplication. A paper copy has also been posted to you.

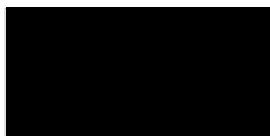
The Statement references the most up to date information that has been submitted to support the planning applications. It also gives an indication of Witnesses that the Applicant would like to call. The Applicant will be represented.

The planning obligation referred to will be provided in draft before the inquiry and an executed copy is anticipated to be provided during the inquiry.

I am anticipating that you will arrange for copies of the Statement to be sent to the Planning Department. A3 pdf copies of all latest submitted plans are available.

Please let me know if you have any queries.

Your Sincerely,



Stephanie Steedman

STATEMENT OF CASES - TAMBA PARK – REFERENCES P/2017/1023 & 0805

INTRODUCTION

1. This is the combined Statement of Cases of the Applicant in relation to two applications for conditional planning permission (“the Applications”) pursuant to Articles 7(1), 9(1) and 19(1)-(4) of the Planning and Building (Jersey) Law 2002 (“the Planning Law”) to develop: Field 770 by demolition of structures and their replacement with self-catering units and a single car-park for Tamba Park and landscaping (“the Tamba Park Application”); and adjacent Field L78 by demolition of a glass house and its remediation to non-horticultural use and erection of a new dwelling on an existing tourist facility car park (“the Tamba House Application”). The development comprises two areas outlined in red (“the Application Site”) for environmentally advanced accommodation comprising 27 cabins for touristic self-catering use and a new home for the Applicant.
2. The Applications ensure retention of most of the Site in employment land use, with minimal ongoing built presence of very high environmental quality, with commensurate beneficial landscape effects and other environmental benefits, and are supported by the Acting Director for the Rural Economy and Visit Jersey.
3. On 18th August 2017, the Minister for Planning determined, pursuant to Article 12(1)(b) of the Planning Law, that the Applications be considered by a Planning Inspector for the reasons that he gave. In essence, the Applications may be a departure from the Island Plan policy, comprise closely related development of the existing Tamba Park Leisure Facility car park and the remediation of Field L78 (all controlled by the same Applicant) for his new home, and raise common planning matters, such “that a comprehensive planning and environmental solution for both parts of the site may be considered”.
4. The Applications secure an appropriate beneficial environmental solution for the regeneration of this large brownfield site by the guaranteed delivery of its restoration to tourism and to agriculture (employment) uses, and one new dwelling. The development realizes significant environmental gains: the restoration of a large brownfield site in the Green Zone; a considerable volumetric reduction of development from 113,000m³ to some 7,850m³; total removal of built development in excess 105,000 m³ and commensurate increase in open (unbuilt) land with restoration of concrete and compacted gravel to the quality of good agricultural land (some 8,837m²), to naturalized amenity areas (also acting as natural water attenuation areas), and to a naturalized garden. Other environmental benefits include the reduction of disturbance amenity by removal of an existing car park accessed from La Rue des Varvots. An identified need is satisfied by the Applications and it is appropriate to develop this large scale brownfield site in the minimally intrusive, sympathetic, and environmentally sensitive and carefully designed manner proposed.

LEGAL FRAMEWORK

5. This is summarised in **Appendix A**. In essence, Article 1 of the Planning Law 2002 defines “building” to include a structure made of any material. Article 7(1) prohibits development without planning permission. Article 9(1) requires an application to be made for permission. Article 13(2) requires provision of an environmental impact assessment. Such assessment has been provided.
6. Article 19(2) requires that permission be granted if the development proposed accords with “the Island Plan” (taken as a whole). Relevant Island Plan Policies are listed in **Appendix B**. Article 19(1) requires that all material considerations be taken into account in the determination of an application for permission.
7. Article 23(1) requires a condition to fairly and reasonably relate to the proposed development and, by (i), may provide for the restoration of the land and of any vegetation on it after execution of the development. Article 25 provides for planning obligations. Under Article (2)(b), an obligation can require specific operations to be undertaken in respect of land.
8. Tourism facilities proposed by the Tamba Park Application are regulated by the Tourism (Jersey) Law 1948 and the Tourism (General Provisions)(Jersey) Order 1990 provide for self-catering accommodation.
9. The Protection of Agricultural Land (Jersey) Law 1964 provides for the protection of agricultural land. Article 1 defines “agriculture” to include: “horticulture”. Article 1 of the Agricultural Land (Control of Sales and Leases)(Jersey) Law 1974 defines “agricultural land” to mean land, including land under glass, used or capable of being used for any purpose of agriculture or horticulture”.
10. The Applicant will show that (for planning purposes) the two existing glasshouses are “structures” within the proper meaning of Article 1(1) of the Planning Law 2002 (which does not differentiate between structure qualities). Island Plan, paragraph 5.159, cannot make a “structure” temporary. Properly interpreted, condition 4 of planning permission, reference 3199/PA, (9th August 1995) does not bite on the existing glass house but was limited to the pre-existing (now removed) “glasshouses” (plural). Then, no other restoration was unnecessary and a new glasshouse was permitted. Condition 4 is otherwise unlawful, including because it could not rationally require restoration of the permitted agricultural land to agricultural land.
11. The Applicant can ensure (by a planning obligation) the sequential delivery of removal of structures and remediation of the brownfields, by restoration of Fields MY770 and (to good agricultural use) L78, and car park relocation. By such a material consideration, comprehensive and appropriate regeneration of the Site is guaranteed to potential use for (non-horticultural) agricultural use, pursuant to the identified need in Island Plan Policies SP1(2); NE7(7) and (9)-(11); E1; ERE6; ERE7; EVE1, together with significant environmental gain.

FACTUAL BACKGROUND**The Site**

12. The Application Site comprises a large area of brownfield land in the Green Zone of gently undulating and open land with field boundaries. The Site is formed of two areas outlined in red for environmentally advanced accommodation in the form of 27 cabins for touristic self-catering use, reduction to a single car-park for Tamba Park, and a new dwelling for the Applicant on a current car park.
13. On the Site are two very large single (commercial) storey structures (clad in glass and stiff plastic) fixed to concrete floors and extending over 18,182m² metres.
14. The volume of the two structures totals c.113 000 m³ and comprises:
 - a) c.71,000 m³ for the structure on Field MY770; and
 - b) c. 42,000m³ for the structure on Field L78.
15. Within the two structures are integral service utilities for water and heating and associated plant and an (oil fired) boiler house, staff accommodation, and integral structures used for the distribution and growing of plants. The two structures (and their utilities) are connected by a footbridge over intervening land (forming the Tamba Park Facility (see below)). Within the two structures, the integral structures are fixed to, or in, the ground and comprise aluminium stands fixed to concrete foundations, raised slider bars and roller tables, with perimeter concrete utility service channels. The particular two single storey structures (and their associated internal services) are “structures” within the scope of “buildings” within Article 1(1), the Planning Law 2002. Their integrated and fixed nature means that their removal would result in their destruction.
16. Inside the two structures, the greater majority of the ground level surface comprises a concrete floor structure (reinforced with mesh) and also large areas of compacted gravel and hardcore providing firm standing (to support growing tables and employees). The Application Site includes (to its west) a large area of concrete hard standing and two large areas of compacted gravel/hardcore (to its west and south-east) which are used for vehicle parking. The Application Site comprises exclusively brownfield land.
17. The Application Site is bifurcated at ground level by the Tamba Park Facility, a long established tourist facility for visitors and tourists. Tamba Park Facility runs beneath a footbridge and around the northern and western side of Field MY770 (and along the eastern side of Field L 78), and is served by two car parks – to the west and south east (the south-eastern one being proposed to be developed here).
18. The two structures are in disuse, are redundant and no longer viable to the horticultural industry, and are in various states of disrepair. The Applicant will show the same in evidence.

Planning Permissions and the History of the Site

19. The following planning permissions are relevant. Planning permission permitted development on:
- a) 22nd May 1975 (reference 3199/I) in relation to Field 770 (extended on 18th August 1978 (reference 4/8/3199-K)). This is the site of the new lodges;
 - b) 4th September 1991 (reference 3199/DA) for change of use to reservoir and tree-scaped land open to the public (to the north of Field 770). A plan showed three glasshouses (two on Field 78 (Plans TB and UB));
 - c) 1st October 1992 (reference 3199/IA) for Landscaping of part of Field L78 to form over-spill parking facilities for visitors (adjacent to La Rue des Varvots) (Plans HC and IC). This is the site of the new dwelling;
 - d) 9th August 1995 (reference 3199/PA) for demolition of existing pair of glasshouses and their replacement with new single glasshouse on Field L 78 (Plans BD, CD, DD, and ED);
 - e) 24th November 2016 (reference P/2016/04503) for change of use of land to form car park to West of site, installation of animatronic sculptures, play areas and acoustic fencing.
20. Certain permissions do not require the removal of the existing structures on the land nor land remediation:
- a) Permission 4/9/3199/I for Field MY770;
 - b) Permission 3199/PA for the single structure on Field L78;
 - c) Permission 3199/IA for the existing car park south of Field L 78.
21. In respect of 3199/PA, the Applicant's primary submission is that no condition requires the demolition of the two structures envisaged by the Applications, their removal, and land restoration. The absence of such a condition, and (today) the terms of Island Plan Policies ERE6 and ERE7, show an identified need for the remediation and appropriate redevelopment of the Application Site land by an alternative means. The Applications secure by a planning obligation the removal of two existing redundant large horticultural structures and the reinstatement of a large area of brownfield land to agricultural land use, together with the retention in employment use of the greater part of the Application Site, and so provide a guaranteed and comprehensive environmental solution to appropriately regenerate this brownfield land.
22. Alternatively, if condition 4 requires removal of the existing structure on Field L 78 and remediation of the land below it, then the Applicant submits that condition 4 is not lawful, including because: it is unreasoned and arbitrary; its requirement is unreasonable because it is circular in requiring restoration of land permitted to be in agricultural use, and because "agricultural use" is imprecise, very wide and unenforceable; and it is unfair in arbitrarily differentiating between requirements for Fields L78 and MY770.

Use of the Application Site and its immediate surrounds

23. The Application Site was, and will mostly remain, in employment use (a use encompassing agriculture and tourism). The development concerns a large reduction in built development and resulting improved land.
24. The two structures on Site were used in the horticultural industry from 1988 until 2013 when Low Value Cost Relief (“LVCR”) was abolished by the States of Jersey. Flowers were imported to and either grown or packed in the structures prior to their export to the United Kingdom. The business on the Site reached a peak by about 2003 and, in common with other glasshouse-based businesses, subsequently declined due to off-Island competition. In 2013, the States of Jersey revoked the LVCR that applied to the products exported from the buildings. These factors compelled closure of the business on the Site, in 2013, as no longer viable.
25. An extensive, and iterative, marketing process in line with Supplementary Planning Guidance SPG Protection of Employment Land (2012) shows that there is no alternative horticultural industry use for the buildings.
26. The structures are redundant (are becoming derelict) and may be considered for non-agricultural purposes.
27. The Tamba Park Application will ensure that that part of the Site remains in employment use, for much needed touristic accommodation. The Tamba House Application will ensure that the majority of the remaining Site also remains in employment use and as available good quality agricultural land, whilst the brownfield car park is appropriately developed upon its removal.
28. The Site straddles, and is almost surrounded by, another employment use, the Tamba Park established and popular tourist facility. See <https://www.tambaexperience.co.uk/tambapark/> and <https://www.facebook.com/search/top/?q=tamba%20park>.
29. Exceptionally, the Applicant has control of Tamba Park and the Application Site and thereby regeneration of this extensive brownfield site can be guaranteed to be delivered. His ability to guarantee land restoration by planning obligation is a material consideration. The Applicant will show that upon completion of the comprehensive development, the development will sit within the existing permitted tourist facility (which will be of improved function and have reduced local highway impact). The development will provide highly sustainable and appropriately accessible accommodation of high environmental standard, and in a much improved and attractive setting, in contrast to the current vast expanse of brownfield land. It will result in significantly less built form and that will have a considerably smaller and lighter environmental footprint, far more appropriate to the Green Zone location of the Site, whilst also guaranteeing the retention of its ongoing employment land use. Open landscape will be restored and field boundaries will also be improved.

THE APPLICATIONS

The Tamba Park Application (PP/2017/1023)

30. The Tamba Park Application comprises the redevelopment of part of the Site by demolition of the structure on Field MY770 and provision of much needed 27 self-catering holiday accommodation units, ancillary structures in a tranquil and a restored and improved landscaped setting.
31. This Application will result in a reduction from 71,000 m³ to some 6,400m³ of built development on this part of the Site, resulting in less than 10% remaining of the existing volume. The 6,400m³ comprises: (27) lodges (5,500 m³); and (4) administration buildings (550 m³).
32. As set out in a Design and Access Statement and refined drawings, the units will be well-designed, timber clad, appropriately orientated with shaded glazed ends, have green roofs, and stand on small columns with a light environmental footprint, in a greatly improved open landscape setting. See **Appendix C**, and the typical unit.

The Tamba House Application (PP/2017/0805)

33. The Tamba House Application proposes redevelopment of a car park (permitted by planning permission, reference 3199/IA (1st October 1992)) to a new and environmentally highly sustainable home for the Applicant and that is appropriate in this particular location, whilst at the same time enabling and ensuring:
- a) demolition of the structure on Field L78 (permitted by 3199/PA) and avoiding it being a local eyesore;
 - b) restoration of concreted and compacted gravel land to a functional and open gently undulating field of 8,400m² for good agricultural use with reinforced field boundaries;
 - c) removal of the Tamba Park car park (on La Rue de Varvots) as a source of amenity disturbance;
 - d) removal of traffic accessing La Rue de Varvots to the Tamba Park Facility as a source of disturbance.
34. This Application will reduce built development from 42,000 m³ to some 1,500m³ on this part of the Site, resulting in less than 3% remaining of the existing built volume.
35. As set out in the Design and Access Statement and in detailed refined drawings, Tamba House will embody the best of good environmental dwelling design and be appropriate here too, being timber clad, with shaded glazed ends, and green roofed whilst set on small columns, and in a naturalized and greatly improved open landscape setting. See **Appendix C**.

SUPPORT

36. The proposed development is supported including by the Acting Director for the Rural Economy, and by Visit Jersey, and is anticipated to be supported by the Department for Infrastructure (Highways). No objections are raised by the Department for Infrastructure (Highways) nor by Environmental Health.

PLANNING OBLIGATION AND CONDITIONS

37. A planning obligation under Article 25(2)(b) of the Planning Law will ensure regeneration deliverability.

38. The Applications have been subject to consultations, including with statutory consultees. Responses include a range of matters that fall to be resolved by planning conditions. The Applicant anticipates agreeing draft conditions before the inquiry (and subject to such comments as the Planning Inspector may have).

39. Article 12(3) provides opportunity for further consultation during the Planning Inquiry.

WITNESSNESS AND EVIDENCE

40. The Applicant will call evidence from witnesses including:

- a) Mr Tim Dunningham on the historic use of the Application Site;
- b) Mr Julian Mallinson, FRICS, on redundancy and marketing of the Application Site, and lack of viability;
- c) Mr Michael Stein, BA(Hons) MRTPI, on Planning Application matters and Application Site history;
- d) Mr Keith Beecham, CEO, Visit Jersey, on Touristic Accommodation Need;
- e) Mr Mark Dennis Dip (Arch), RIBA, on the architectural and landscape design of the development proposals;
- f) Mr Alex Welch, Senior Planner, Transport, on transportation matters;
- g) Mrs Stephanie Steedman, BA Hons, MA, RTPI, PIEMA, on environmental impact assessment, planning judgments, planning policy and overall Island Plan compliance.

41. The evidence will include technical reports appended to witness evidence.

DOCUMENTS

42. The Applicant will rely upon documents including:

- a) The foregoing witness' proofs of evidence and reports;
- b) The planning history of the Application Site;
- c) The Application documents, including as updated;
- d) Relevant case law;
- e) Other relevant documents.

CONCLUSIONS

43. The Applicant will show that conditional planning permission is justified because the development accords with the provisions of the Island Plan, taken as a whole, and material considerations reinforce that position.. If (which is denied), one of the Application(s) is in breach of a Plan and the other is not, then, taking the Island Plan as a whole, and having regard to material considerations, the Applications are in overall accord with the Plan because they are closely linked and provide an overall environmental solution for the Site of two very large glasshouses (that can properly be anticipated to become an eyesore in due course (as well as being in disuse)), and restoration of this particular part of the Green Zone to an largely open landscape with reinforced boundaries with minimum required development. Thereby, a significant environmental gain can be delivered.

APPENDIX A

LEGAL FRAMEWORK

44. The Tourism (Jersey) Law 1948 provides for tourism.
45. Articles 8-10 of the Tourism (General Provisions)(Jersey) Order 1990 provide for self-catering accommodation.
46. The Protection of Agricultural Land (Jersey) Law 1964 provides for the protection of agricultural land and Article 1 defines “agriculture” to include “horticulture” and the meaning of “agricultural land”.
47. The Agricultural Land (Control of Sales and Leases)(Jersey) Law 1974 provides for sales and leases of agricultural land and Article 1 defines “agricultural land” to include land under glass.
48. The Planning Law 2002 provides for the development of land. Article 1 defines “building” to include “structure”, and Article 2 provides the purposes of the Law. Article 5(1) and (2) define “develop” and to include the demolition or removal of a building (as so defined).
49. Article 13(2) requires the Applicant to provide an environmental impact assessment.
50. Article 19(2) requires that planning permission be granted if the development proposed accords with the Island Plan. There is no requirement that a development must comply with every policy in the Island Plan. Rather, it must comply with the “Island Plan”, taken as a whole. Article 19(1) requires that all material considerations be taken into account in the determination of an application for planning permission.
51. Article 23 provides for planning conditions and, in particular, (2)(i) provides for restoration of the land after a development. Article 23 does not provide for removal of buildings.
52. Article 25(2)(B) provides for planning obligations to require specified operations to be undertaken.

APPENDIX B**ISLAND PLAN POLICY**

53. The Minister is required by Article 3(1) of the Planning Law to prepare an Island Plan and by Article 4(3), the Island Plan must further the purposes of Article 2(1) and the intention of Article 2(2).

54. Article 19(2) requires that permission be granted if the development proposed accords with the Island Plan.

55. The latest Island Plan 2011 (revised in 2014) policies are relevant:

- a) SP1(2) Spatial Strategy;
- b) SP2 Efficient use of resources;
- c) SP3(4) Sequential approach to development;
- d) SP4 Protecting the natural and historic environment;
- e) SP5(1), (2) and (3) Economic growth and diversification;
- f) SP6 Reducing dependence on the car;
- g) SP7 Better by design;
- h) GD1 General development considerations;
- i) GD4 Planning obligations;
- j) GD6 Contaminated land;
- k) GD7 Design quality;
- l) GD8 Percentage for Art;
- m) NE1 Conservation and enhancement of biological diversity;
- n) NE2 Species protection;
- o) NE3 Wildlife corridors;
- p) NE4 Trees, woodland and boundary features;
- q) NE7 (7), (9)-(11) Green Zone;
- r) HE1 Protecting historic buildings and places;
- s) ERE6 Agricultural buildings, extensions and horticultural structures;
- t) ERE7 Derelict and redundant glasshouses;
- u) EVE1 Visitor accommodation, tourism and cultural attractions;
- v) TT4 Cycle parking;
- w) TT5 Road safety;

- x) TT7 Better by public transport;
- y) TT8 Access to public transport;
- z) TT9 Travel plans;
- aa) TT12 Parking provision outside St Helier;
- bb) NR1 Protection of water resources;
- cc) NR2 Water capacity and conservation;
- dd) NR7 Renewable energy in new developments;
- ee) WM1 Waste minimization and new development;
- ff) LWM1 Liquid waste minimization and new development;
- gg) LWM2 Foul sewerage facilities;
- hh) LWM3 Surface water drainage facilities.

APPENDIX C

Drawing Issue Schedule - issued 05.12.17

Planning Application - P/2017/0805 - schedule of drawings issued with planning application and subsequently updated.

drawing no.	drawing title	previously issued	updated issue
17003 107	as existing site layout	revision 01	revision 02
17003 108	as proposed site layout	revision 01	revision 03 (05.12.17) boundary colour amended
17003 109	as proposed site layout / landscaping	revision 01	revision 03 (05.12.17) boundary colour amended
17003 110	as proposed building layout	revision 01	revision 02
17003 111	as proposed general arrangement layout	revision 01	revision 02
17003 112	as existing elevations / proposed demolitions	revision 01	revision 02
17003 113	as proposed elevations	revision 01	revision 02
17003 114	as proposed sketch views	revision 01	revision 02
17003 115	as proposed access improvements	revision 01	revision 02 - drawing now removed from application
17003 116	as proposed parking area	revision 01	revision 02 - drawing now removed from application
17003 117	as proposed parking area - site entrance widening	revision 01	revision 02 - drawing now removed from application

General notes:

Modifications to drawings to align the title of the Client as JAJ Properties Limited and not Tamba Limited, additional amendments noted to specific drawings above.

New amendments required as a consequence of removing the temporary parking area from this planning application.

Drawing Issue Schedule - issued 18.12.17

Planning Application - P/2017/1023 - schedule of drawings issued with planning application and subsequently updated.

drawing no.	drawing title	previously issued	updated issue
17003 118	as existing overall site plan layout in context	revision 01	revision 02
17003 119	as proposed overall site masterplan layout in context	revision 02	revision 03 - highway comments incorporated / site boundary clarified
17003 120	as existing site layout	revision 01	revision 02 - site boundary clarified
17003 121	as proposed overall site masterplan layout	revision 03	revision 05 - additional highways comments incorporated
17003 122	as proposed site layout	revision 02	revision 03 - site boundary clarified
17003 123	as existing elevations / proposed demolitions	revision 01	revision 02
17003 124	as proposed plan / sections / elevations three bedroom model	revision 02	revision 04 - chassis information added to sections / bike hoops added to plan
17003 125	as proposed plan / sections / elevations two bedroom model	revision 02	revision 04 - chassis information added to sections / bike hoops added to plan
17003 126	as proposed plan / sections / elevations ancillary model	revision 01	revision 03 - chassis information added to sections / bike hoops added to plan
17003 127	as proposed sectional elevations	revision 02	revision 03 - site boundary clarified on section locator
17003 128	as proposed sectional elevations	revision 02	revision 03 - site boundary clarified on section locator
17003 129	as proposed parking area - site entrance improvements	revision 02	revision 05 - additional highways comments incorporated
17003 130	as proposed overall site masterplan layout area A	revision 02	revision 03 - site boundary clarified
17003 131	as proposed overall site masterplan layout area B	revision 02	revision 03 - site boundary clarified
17003 132	as proposed overall site masterplan layout area C	revision 02	revision 04 - refuse stores relocated / site boundary treatment strengthened
17003 133	as proposed overall site masterplan layout area D	revision 02	revision 04 - additional highways comments incorporated
17003 134	as proposed sketch views	revision 01	revision 02 - additional landscape notes added
17003 135	as proposed sketch views	revision 01	revision 02

drawing no.	drawing title	previously issued	updated issue
17003 136	as proposed sketch views	revision 01	revision 02
17003 137	as proposed overall site masterplan view - lighting	new drawing	revision 02 - information updated
17003 138	as proposed overall site masterplan view - greenhouse overlay	new drawing	revision 02
17003 139	as proposed access improvements	revision 02	revision 04 - additional highways comments incorporated
17003 140	as proposed overall site masterplan layout - site lighting	new drawing	revision 03 - site boundary clarified
17003 141	as proposed overall site masterplan - site drainage	new drawing	revision 05 - additional highways comments incorporated
17003 142	proposed bus shelter	new drawing	revision 01
17003 143	main entrance - la rue de la frontiere landscape character assessment	new drawing	revision 01
17003 144	side access - la rue des varvots landscape character assessment	new drawing	revision 01
17003 145	coordinated services drawing 1of3 for la rue des buttes/la rue de la frontiere	new drawing	revision 01
17003 146	coordinated services drawing 2of3 for la rue des buttes/la rue de la frontiere	new drawing	revision 01
17003 147	coordinated services drawing 3of3 for la rue des buttes/la rue de la frontiere	new drawing	revision 01

General notes:

Modifications to drawings to align the title of the Client as JAJ Properties Limited and not Tamba Limited, additional amendments noted to specific drawings above.

New amendments required as a consequence of removing the temporary parking area from this planning application.
New amendments required as a consequence of agreeing the drainage solution with DfI and the requirements of the Inspector in relation to the demonstration of wheel/chassis to the proposed holiday lodges.