

STATES OF JERSEY



GREEN STREET POLICE HQ: TRAFFIC AND PARKING (S.R.3/2013) – RESPONSE OF THE MINISTER FOR TRANSPORT AND TECHNICAL SERVICES

**Presented to the States on 15th April 2013
by the Minister for Transport and Technical Services**

STATES GREFFE

**GREEN STREET POLICE HQ: TRAFFIC AND PARKING (S.R.3/2013) –
RESPONSE OF THE MINISTER FOR TRANSPORT AND
TECHNICAL SERVICES**

Ministerial Response to: S.R.3/2013

Ministerial Response required by: 11th April 2013

Review title: Green Street Police HQ: Traffic and Parking

Scrutiny Panel: Environment

INTRODUCTION

As Minister for Transport and Technical Services, I would like to thank the Panel for undertaking this review in a short space of time, so as to inform the debate of P.92/2012 on 4th March, 2013. The Panel's report will also provide valuable additional input to assist the Minister for Planning and Environment in his consideration of the planning application.

In responding to the Scrutiny Panel's report, I have liaised with both the Minister for Home Affairs and the Assistant Minister for Treasury and Resources, as many of the findings are more appropriate for their comment. Both have confirmed their agreement to the following response. Some of the Report's comments require response from the Minister for Planning and Environment, and his response is submitted separately.

FINDINGS

	Findings	Comments
1	Island Plan policies recognize the importance of St. Helier having sufficient car parking spaces to support the life and comings and goings of its residents, shoppers and those working in town. The plan is based on approximately 4,000 public off-street spaces being available for commuters and shoppers.	As clearly stated in the Island Plan, Policy TT10 was set in order to contribute to the Sustainable Transport Policy objective of reducing peak-hour congestion by 15%. There is therefore a presumption against applications for public parking spaces in town if the total number is 4,000 or above. This does not mean there is a desire to maintain a number of 4,000 as the Panel appears to suggest; this would not achieve an objective of reducing commuter spaces.
2	The development of the town park has already reduced the number of public car park spaces to below the threshold level of 4,000 included in the Island Plan. The plan anticipates that private sector developments in Bath Street,	The Panel's report describes a 'threshold' of 4,000 public parking spaces in the Island Plan (Policy TT10) as a level that is required to be maintained. As described above, Island Plan Policy TT10 clearly states that this was set in order to contribute to the Sustainable Transport Policy

	Findings	Comments
	Tunnell Street and Ann Street will produce a compensating gain of 458 public car parking spaces in the plan period. This no longer seems likely to be achieved.	objective of reducing peak-hour congestion. It is therefore a maximum level which should not be exceeded, not, as implied by the Panel, a figure which needs to be maintained.
3	The development of the new Police HQ on the open area to the south of Green Street Car Park will have a very significant adverse impact on the availability of public off-street car parking within the Eastern Gateway area of St. Helier. This was identified in the autumn of 2011 by the project team as being a critical factor to the success of this project.	<p>The impact on off-street parking is considered manageable. The spare capacity at Pier Road Car Park and other long-stay car parks in St. Helier is greater than the anticipated impact at Green Street.</p> <p>The Panel's view that the impact on Green Street Car Park is greater than that estimated by the Transport Assessment work or that the new building will result in a total loss of 200 spaces is not supported by any evidence provided to the Panel.</p> <p>TTS supports the applicants' assessment which predicts that the actual impact on Green Street Car Park will be the displacement of 91 spaces due to the development, plus the need to accommodate <i>some</i> of the 86 staff who may wish to park at Green Street.</p>
4	Despite its importance, insufficient weight has been given to the adverse impact of the new Police HQ on public car parking provision during the project planning process. This aspect has only been considered in any depth at this very late stage in the process.	Adequate weight has been given to this issue, which has been given consideration by qualified traffic engineers on behalf of the applicant in liaison with TTS as part of the Planning Application.
5	As soon as construction commences on site, the development of the Police HQ at Green Street will have the immediate effect of physically reducing the number of parking spaces in Green Street Car Park by 91 (15% of the current total) which reduces the total number of public car parking spaces in town to 3,844, and 156 below the Island Plan threshold.	<p>The displacement of 91 spaces is a recognised consequence of the development of the new Police HQ.</p> <p>As identified above, Island Plan Policy TT10 is a maximum level which should not be exceeded, not, as implied by the Panel, a 'threshold' figure which needs to be maintained.</p>

	Findings	Comments
6	Comments from Arup consultants on the effective increase in parking demand for public car parking which will be generated by the new Police HQ once it is operational have not been represented or understood correctly. Arup have confirmed to the Panel that their estimate of the impact created by the new Police HQ of only 65 spaces did not represent the impact on Green Street alone, but on public parking in St. Helier as a whole. Arup have clarified their evidence in respect of Green Street to the effect that around 86 spaces would be expected to be taken up by police staff.	The Police travel survey clearly identifies that the current 50% car use would reduce to around 40% when travelling to the new building, due to the loss of free parking. This gives a <i>maximum</i> demand of 86 people travelling to car parks in town. It is important to note that this maximum demand is on car parks in town, not directly on Green Street. Due to the proximity of car parks within St. Helier, TTS traffic engineers take the car parking supply in St. Helier as a whole, since most urban locations are reachable from most car parks via a 10 minute walk. Of these 86 people, a number are likely to choose alternative parking arrangements in the area (e.g. private parking), park in other car parks, car share, or will change travel modes. Not all will use Green Street Car Park.
7	The Panel's study of detailed results from the internal States of Jersey Police survey of transport arrangements and the forecasts based on it supports the conclusion that the final figure could rise to over 100. The Panel considers the figure of 86 to be a minimum.	The Panel has based its views on how people <i>currently</i> travel, rather than how they will travel in the future to the new Police HQ. It is not clear why the Panel believes current travel behaviour is a better yardstick than an assessment of likely travel to the new building, which is what the transport assessment has been based on. The Panel's assertion that the 86 people must be considered as a minimum and 'might' rise to over 100 has no basis and has not been supported by evidence. TTS traffic engineers, who are statutory consultees to the Planning Application process, have confirmed that they consider the conclusions with regard to predicted parking demand to be reasonable.
8	The evidence therefore suggests that (excluding other factors) the most likely result of the loss of parking spaces combined with the impact of new staff parking will be to reduce the number of spaces currently available to commuters in Green Street Car Park by somewhere between 177 and 191. (This represents approximately 30% of the 608 spaces available there currently.)	There is no 'empirical evidence' to support the Panel's view that 109 will travel to work by car – this is simply extrapolating current modes of travel. There is no evidence to suggest that any more than 86 will arrive at Green Street Car Park or that there will be a shift in mode-change to the car as a result of the move to Green Street.

	Findings	Comments
9	Green Street car park is predominantly filled on a daily basis by commuters travelling to workplaces in the east of town. Evidence from TTS suggests that it usually fills up between 8.00–9.00 a.m., although this may be occurring later recently owing to a shift of workers towards the Waterfront area. Any spaces arising during the mid-afternoon period are then available to shoppers, who are also the major users on Saturdays.	Green Street Car Park will continue to have ample space available for shopper car parking on Saturdays. On weekdays there is ample shopper parking space available at other short-stay car parks in St. Helier.
10	Owing to their shift working patterns much of the car parking by police staff is likely to occur from shortly before 7.00 a.m. daily. Police staff will therefore have the opportunity to take up spaces in Green Street before most other commuters arrive. Police staff arriving for later shifts may also take up parking spaces which could otherwise be available for shoppers.	The Panel's report appears to express the view that the majority of Police staff will arrive before 7.00 a.m., take first call on available spaces at Green Street; and that this availability will prompt more staff to use the car, thereby further increasing pressure on the car park. This is not supported by the evidence relating to shift patterns provided to the Panel. The States of Jersey Police shift patterns indicate that less than 30 staff would be expected to arrive before 7.00 a.m., with the majority of Police Officers and Civil Servants on the day-shift arriving broadly at the same time as other commuters. The 24 hour uniformed cover includes shifts which begin at 2.00 p.m. and 9.00 p.m., which would serve to spread the arrival of staff to the building. The only dual shift changes are at 7.00 a.m. and 9.00 p.m. There is plenty of free space at these times in the car park for the changeover to happen, and this will have no additional impact on commuters (c.24 Officers each shift).
11	The Transport Assessment supplied by Arup consultants as part of the planning application by Property Holdings was based on a survey of States of Jersey Police staff carried out between 4th and 7th October 2011 to which 181 staff members responded (54.8% of the workforce). However, the Panel was informed by Arup that they did not independently analyse the full	A sample size of over 50% gives good confidence in the results. It is accepted that the consultant used the summary data provided by the States of Jersey Police.

	Findings	Comments
	survey results, but relied upon a summary sheet provided to them by the States of Jersey Police.	
12	The Panel's subsequent review of the detailed results has identified inconsistencies between the survey data and summary sheet which lead it to conclude that information in the Transport Assessment based on the survey is potentially unreliable.	The estimated impact on parking has been reviewed by TTS traffic engineers who consider it to be reasonable. Values for travel modes have been compared against data from other studies and found to be reasonable.
13	Island Plan policies require travel plans to be produced for all major developments with significant traffic and parking impacts before the Minister for Planning and Environment is required to make a decision on the application. The Island Plan policy also enables the Minister to determine how much or how little weight to give a travel plan based on its enforceability when deciding an application.	A draft Travel Plan has been prepared, and TTS officers have liaised and will continue to liaise, with the States of Jersey Police to assist in its effectiveness. TTS would recommend that a condition of permission should require an approved Travel Plan to be submitted prior to occupation of the development. TTS would advise the Planning and Building Services Department of the effectiveness of the Travel Plan, however the use of planning conditions are for the Minister for Planning and Environment to decide upon.
14	The Minister for Planning and Environment informed the Panel that he may not decide the application without the travel plan being in place, in accordance with the Island Plan. However, Planning Officers have issued contradictory information to the project team on this requirement.	See comment on Finding 13.
15	The States of Jersey Police and Home Affairs Department intend to develop a travel plan as required by the Island Plan. However, this plan does not currently exist and is not expected to be enforceable upon staff members.	As mentioned in comment 13 above, the States of Jersey Police has produced a first draft Travel Plan and discussions have taken place with TTS about the process of moving it forward. This will be finalised once the scheme has been confirmed and in tandem with the detailed design of the building. As a condition on any future Planning Permit, this plan would therefore need to be in place before the building is occupied. The production of an adequate plan would be enforceable if it is required as part of a Planning Application. In terms of its enforceability on staff, a Workplace Travel Plan is, by its nature, about

	Findings	Comments
		an employer incentivising people to change their habits, whether through flexible working policies, providing facilities (bike parking, showers, changing, etc.) or financial incentives to move away from the car. Individuals will always ultimately have a personal choice in how they travel to work; such a plan is therefore enforceable on an organisation rather than on its individual staff.
16	Based on the above, assumptions of the impact of the Police HQ on car parking as submitted to the Minister for Planning and Environment are considered unreliable.	In summary, TTS consider the traffic consultants' forecast figures identified for traffic and parking to be reasonable. It is not clear why the Panel believes current travel behaviour (on which the Panel bases its figures) is a 'better yardstick' than an assessment of likely travel to the new building, which is what the transport assessment has been based upon.
17	If this were a private office development of this scale, Planning's parking guidelines to determine the extent of non-operational parking required on site would be based on individual circumstances, and in particular the availability of public car parking nearby. The Panel considers that a reasonable interpretation of the parking guidelines would require a private development of a similar scale on this site to include some on-site parking provision, to offset the displacement of significant numbers of commuters who currently rely on the adjacent public parking facilities. The Panel questions whether it is right to treat public developments more favourably by permitting this substantial development of some 5,700 m. ² , designed to accommodate 330 staff to include no non-operational on-site parking provision at all.	Whilst this is a matter for the Minister for Planning and Environment, from the perspective of the applicant, the standard process has been followed and it is believed that the application has been treated no differently than any other development. It is understood that the parking requirements for private developments are considered by the Planning Authority on a case-by-case basis. It is also understood that the consideration of private staff parking associated with private developments in the town is made within the context of the States' Sustainable Transport Policy which seeks to discourage commuter travel by private car.
18	The Assistant Minister for Treasury and Resources was not prepared to answer questions on a rumoured proposal to retain a	TTS does not consider the provision of private parking for staff to be necessary and has disregarded this issue in its comments. However the Assistant Minister for Treasury and

	Findings	Comments
	number of private parking spaces in the area, which might alleviate the parking impact of the Police HQ. In the absence of any reliable information on this proposal the Panel considers that it should be disregarded by the Minister for Planning and Environment in determining the application.	Resources has confirmed that a private landowner in the area has made the offer of secure off-road private parking which could be used by staff. Written Question 7226 of 20th November publicly responded to this issue and made it clear that the landowner has requested that the details of this offer, including location, remain confidential for the time being.
19	The recent announcement by TTS of a project to expand Snow Hill car park highlights the requirement for masterplanning for this area of town under the Island Plan. A development plan for the whole Eastern Gateway area would be expected to include both Snow Hill and the Green Street multi-storey car park.	The Panel's views on the need for masterplanning are entirely a matter for the Minister for Planning and Environment.
20	It is known that the structure of Green Street Car Park will require substantial repair and capital investment within 7 years. The needs of a new Police HQ and public parking could potentially be better met by a phased redevelopment of the whole publicly-owned site, rather than by developing parts of it in a piecemeal and unco-ordinated way.	Refurbishment of Green Street Car Park will be due in approximately 7 years' time. This will be a cost-effective treatment to extend its life. It is not feasible to consider a full redevelopment of Green Street Car Park within the timescales of the police station project. As identified in the debate on P.92/2012, an initial assessment has identified that the possibility of extending the top floor of Green Street Car Park should be technically feasible; however key considerations would be the additional cost and the need to avoid significant delays to the development of the new Police HQ. It has been recognised that, whilst there is considerable capacity in the commuter parking system, to relieve localised pressure on Green Street Car Park, proposals for an extension to Green Street Car Park to provide additional spaces will be progressed as part of the Police HQ scheme.
21	The proposed location of 3 visitor car spaces at Snow Hill is not considered to be practical or satisfactory.	The Panel's concerns about visitor parking have already been formally accepted as part of the Ministerial response to the Education and Home Affairs Scrutiny Panel's report S.R.19/2012, that a further review of visitor parking arrangements will be undertaken as part of the next design stage with the aim of improving on the existing arrangements.

	Findings	Comments
22	The location of a substantial quantity of motorcycle and cycle parking on the south side of La Route du Fort is considered inappropriate owing to concerns about noise and overlooking. There are also considered to be potential safety concerns arising from the need for riders approaching from the west to stop and turn across the main road at any hour, day or night.	<p>This part of the scheme is subject to the Planning Application process, which will ultimately decide the appropriateness of these arrangements in the context of planning policy. Should the application be approved, the exact details of the landscaping scheme in this area would be the subject of a condition, with details to be agreed. Landscape boundary treatments will be reinforced where required, in order to preserve privacy, reduce any incidental noise from the use of this area and prevent overlooking.</p> <p>The revised road layouts have been developed in conjunction with competent road traffic engineers and have been accepted in principle by TTS as part of the Planning Application process. The need to turn right is no different to any other single carriageway road such as at the existing Police Station at Rouge Bouillon.</p>
23	The proposal that parking for disabled visitors be shared with a goods delivery bay is unacceptable.	Arrangements will be put in place to enable proper access for disabled parking at the front of the building. Detailed arrangements in this area will be developed as part of the next stage of design, but this will include implementing procedures for deliveries to ensure they do not impact on the availability of disabled parking.
24	Road safety hazards are potentially created by: <ul style="list-style-type: none"> • the proximity of the proposed main entrance of the Police HQ to the Green Street roundabout • the restricted visibility of vehicles using the exit provided for prisoner transport vehicles • an increased number of pedestrians using the Green Street crossing from Snow Hill to La Route du Fort. 	<p>The revised road layouts have been developed in conjunction with competent road traffic engineers and have been accepted in principle by TTS as part of the Planning Application process.</p> <p>The Panel rightly points out that the impact of revised arrangements on the flow of traffic is important and arrangements for crossing Green Street will be assessed by Traffic specialists, in conjunction with TTS, as part of the next stage of design.</p> <p>If, having been assessed by competent traffic engineers, additional or enhanced pedestrian crossings are required as a result of this development; they will be included within the scheme.</p>

RECOMMENDATIONS

	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
	<u>Major Issues</u>				
1	The Panel suggests that the Minister for Planning and Environment considers the evidence included in this report before making any determination of the current planning application, as it is believed that traffic and parking implications of the proposed new Police Headquarters have been unintentionally under-represented in material submitted with the planning application. In particular it is felt that information presented in respect of parking impacts is potentially unreliable.	ENV	N/A	This is a matter for the Minister for Planning and Environment; however, for the reasons identified above it is not accepted that the traffic and parking implications have been ‘under-represented’, or that the information with respect to parking impacts is ‘unreliable’. As stated above, TTS traffic engineers, a statutory consultee in the planning process, have confirmed that they consider the conclusions with regard to predicted parking demand to be reasonable.	
2	The Panel also recommends that in future, all major States development projects should be subject to full planning procedures at an early stage to ensure effective communication between all parties, early identification and proper analysis of key issues and allow time for all relevant requirements under the Island Plan to be undertaken in a comprehensive and timely manner and reduce the risks inherent in the project planning process.	ENV T&R	N/A	Discussions about the project have been taking place with the Planning Authority since September 2011. This process has included at least 10 meetings with Planning Officers, 2 presentations to the Jersey Architecture Commission and 2 public consultation exercises in advance of making the Planning Application. The Planning Application was made on 3rd August, 7 months ago, which has provided adequate time for the application to be considered. From the perspective of the applicant, a full and proper procedure has been followed.	
3	To address the major concerns about the significant adverse impact of the proposed development of the development on public car	TTS T&R	Accept	The Police HQ project Design Team undertook an initial assessment of the possibility of extending the top level of the car park a year ago. This initial	Q2 2013

	Recommendations	To	Accept/ Reject	Comments	Target date of action/completion
	<p>parking, the Panel suggests that urgent consideration should be given to identifying whether there exists a viable engineering solution to the need to add additional floors of parking space to the existing car park to compensate for the loss of parking spaces as a result of the development. If this proves positive the engineering solution identified should further be examined for technical and financial feasibility.</p>			<p>assessment found such a scheme to be technically feasible and identified that 53 spaces could be added at an estimated cost of £1.2 million. It was, however, decided not to progress with this at the time, largely because the additional cost would be difficult to justify when there was spare capacity in the commuter parking system in St. Helier. Following the recent States debate, it is apparent that States Members believe that this would be a useful addition to the scheme to relieve localised pressure on Green Street Car Park. This solution will therefore be included in the project, subject to a more detailed assessment of cost and implications to programme. The initial assessment of a cost of £1.2 million would suggest that the development cost could be covered by parking income from the spaces created.</p>	
4	<p>Whether the Panel's suggestion of adding additional floors to the existing car park is found to be technically and financially feasible or whether this would require the complete demolition and redevelopment of the existing car park, it is further recommended that plans be progressed as part of a phased scheme for the car park with the proposed Police HQ. This should provide the opportunity to incorporate sufficient new commuter spaces to replace those lost during construction of the new HQ building, at the</p>	T&R TTS ENV HA	Reject	<p>It is not feasible to consider a full redevelopment of Green Street Car Park within the timescales of the police station project. As identified above, a proposal to extend the top floor of Green Street Car Park, providing 53 spaces, will be included in the Police HQ project.</p>	

	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
	same time providing dedicated parking for visitors to the Police HQ and adequate space for non-operational police use, including facilities for motorcycle and cycle parking.				
5	It is also recommended that a masterplanning exercise be carried out for the Eastern Gateway area of St. Helier to ensure that all future development proposals in the area are properly co-ordinated and take the wider needs of the town fully into account.	ENV	N/A	This is entirely a matter for the Minister for Planning and Environment.	
	<u>Detail Issues</u>				
6	The Panel considers that provision for visitor car parking would be better placed either within Green Street Car Park, or as an alternative to the motorcycle and cycle parking area proposed for the south side of La Route du Fort.	T&R TTS ENV HA	Partly accept	The need to undertake a further review of visitor parking arrangements as part of the next design stage has already been accepted. The Panel's suggestions will be included within this.	Q4 2013
7	Consideration should be given to locating motorcycle and cycle parking for police staff elsewhere, possibly within Green Street Car Park.	T&R TTS HA	Partly accept	It is important in respect of minimising car travel to the Police HQ that good parking facilities for motorcycle and cycle parking are provided. The Panel will be aware that this is a significant requirement and a review of available areas in the locality was undertaken prior to selecting this site. The Planning Application process is the most appropriate way to determine the suitability of this proposal. Should this proposal not be acceptable in planning terms, alternate solutions to meeting this requirement will be explored, including those suggested by the Panel.	Q4 2013

	Recommendations	To	Accept/ Reject	Comments	Target date of action/completion
8	The proposal that parking for disabled visitors be shared with a goods delivery bay should be reconsidered.	T&R HA	Accept	This will be reconsidered as part of the next stage of design, including the development of measures to ensure deliveries do not impact on the availability of disabled parking.	Q2 2013
9	Further consideration should be given to possible road safety hazards created by: <ul style="list-style-type: none"> • the proximity of the proposed main entrance of the Police HQ to the Green Street roundabout • the restricted visibility of vehicles using the exit provided for prisoner transport vehicles • an increased number of pedestrians using the Green Street crossing from Snow Hill to La Route du Fort. 	TTS ENV	Partly accept	<p>Revised road layouts have been developed in conjunction with competent road traffic engineers and have been accepted in principle by TTS. No safety concerns have been raised as part of the Planning Application process.</p> <p>The arrangements for crossing Green Street will be assessed by professional traffic specialists as part of the next design stage. If this work identifies additional or enhanced pedestrian facilities, they will be included within the scheme.</p>	Q4 2013
10	In the likely event that modifications are required to crossing arrangements on Green Street and La Route du Fort there will be a need for traffic modelling to predict the potential impact on vehicle movements and avoid additional delays at peak hours.	TTS ENV	Accept	This is accepted since it is essential that any new crossing facility should not have significant congestion impacts.	Q4 2013

CONCLUSION

I would like to reiterate my thanks to the Panel for its work on this review.

Whilst I and other Ministers challenge the view that the impact on Green Street Car Park has been under-represented and that the information provided is potentially unreliable, the concerns about the localised impact on Green Street Car Park are noted, and the proposal to extend the top floor of Green Street will be an appropriate mitigation for that issue.

The recognition expressed by the Panel that seeking to abandon the project at this stage will result in significant financial implications is very much appreciated. The impact of further delay is unthinkable in meeting the critical needs of the States of Jersey Police.

In addition, when considered more broadly, this is an important building project for the Island. Funding is already approved and its construction would provide a major stimulus for the local construction industry. This becomes even more important at a time when the number of unemployed local people exceeds 2,000.