

STATES OF JERSEY



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

**Presented to the States on 12th April 2013
by the Minister for Planning and Environment**

STATES GREFFE

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

Ministerial Response to: S.R.3/2013
Review title: Green Street Police HQ: Traffic and Parking
Scrutiny Panel: Environment

INTRODUCTION

The Minister for Planning and Environment would like to extend his thanks to the Environment Scrutiny Panel for carrying out this review within a short timeframe, the findings of which have not only informed the debate on P.92/2012 but will also, where relevant and appropriate, be material to his determination of the planning application P/2012/1005.

RESPONSE TO THE PANEL’S FINDINGS

	Findings:	Comment:
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.	<p>The figure of 4,000 public off-street car parking spaces cited in Policy TT10 of the 2011 Island Plan is not a target at which off-street public car parking is required to be maintained, but rather is a threshold against which any justification for the provision of any additional provision can be assessed.</p> <p>It is also important to recognise that the relative proportions of short-stay and long-stay off-street parking provision is more significant than overall levels of provision in seeking to contribute towards the objective of reducing peak-hour congestion by 15%, in accord with the objectives of the Sustainable Transport Policy.</p> <p>Policy TT10 explicitly encourages the limitation or reduction of long-stay public off-street parking provision, such as that provided at Green Street MSCP, to help contribute towards this objective.</p>

	Findings:	Comment:
2	<p>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, 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.</p>	<p>The development of the Town Park resulted in a reduction of approximately 400 long-stay spaces which accords with the objective of reducing the proportion of long-stay parking available to commuters to help ensure a 15% reduction in peak-hour congestion.</p> <p>Some new off-street public parking has been provided: at Ann Place, comprising 109 long-stay spaces; at the former Ann Street Brewery site comprising 38 long-stay spaces; and at Le Coin comprising 27 short-stay spaces; all of this provision is currently temporary</p> <p>There is, however, little or no evidence that the loss of long-stay parking space at Gas Place has caused any significant parking issues for commuters and, having regard to overall levels of provision, it is evident that there remains capacity within long-stay off-street parking provision elsewhere in St. Helier and specifically at Pier Road (of c.250 spaces).</p> <p>The requirement for, and ability of, private sector development in the North of Town area to contribute to public parking provision is presently the subject of review, as part of the monitoring associated with the implementation of the North of Town Masterplan.</p>
3	<p>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>	<p>It is noted that the impact of the development of part of Green Street car park to accommodate a new Police HQ would result in the direct loss of 91 spaces and that there will also be some additional demand for the remaining long-stay spaces as a result of their potential use by people working at the new Police HQ.</p> <p>It is noted that Green Street MSCP is invariably full each working day and that the increased demand for long-stay off-street public parking from users of a new Police HQ building will have the potential to displace/discourage existing car park users: it is noted that the extent of this additional impact remains at issue within a range of 65 – to over 100 spaces.</p>

	Findings:	Comment:
		<p>The Minister will have regard to this overall impact in the determination of the planning application for the site; together with the existing capacity of public off-street long-stay parking provision elsewhere in St. Helier (at c.300 spaces inc. c.250 at Pier Road and 20 spaces at Route du Fort); and the objectives of the Sustainable Transport Policy of seeking to limit or reduce the provision of long-stay parking and to reduce peak-hour congestion by 15%.</p>
4	<p>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.</p>	<p>The impact of the development of a new Police HQ upon the availability of public off-street parking provision will be material to the Minister's determination of the current planning application P/2012/1005.</p> <p>This matter will be one of a number of material considerations that the Minister will need to consider and weigh, relative to other aspects of the proposal, in his determination.</p>
5	<p>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>	<p>See comment on Finding 1.</p>
6	<p>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</p>	<p>See comment on Finding 3.</p>

	Findings:	Comment:
	evidence in respect of Green Street to the effect that around 86 spaces would be expected to be taken up by police staff.	
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.	See comment on Finding 3.
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.)	See comment on Finding 3.
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.	See comment on Finding 3.
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	See comment on Finding 3. The Minister will also have regard to the evidence provided by the Ministers for Home Affairs and Transport and Technical Services, and the Assistant Minister for

	Findings:	Comment:
	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.	Treasury and Resources, which states that the shift patterns of the States of Jersey Police would indicate that less than 30 staff would be expected to arrive before 7.00 a.m.; that the majority of police officers and civil servants will travel at similar times to other commuters; and that during the working week the uniformed cover includes shifts which begin at 2.00 p.m. and 9.00 p.m.
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 survey results, but relied upon a summary sheet provided to them by the States of Jersey Police.	See comment on Finding 3.
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.	See comment on Finding 3.
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.	<p>Travel plans are packages of measures produced by employers to encourage staff to use alternatives to single-occupancy car use.</p> <p>A workplace can choose to develop a travel plan at any time, or it can be required to develop a travel plan as part of a planning application or a condition of planning permission for new development.</p> <p>Typical actions in a workplace travel plan include improving or providing facilities for pedestrians and cyclists (such as showers, lockers, drying facilities and cycle parking), and initiatives such as the promotion and</p>

	Findings:	Comment:
		<p>subsidy of public transport, and the encouragement of carpooling, working from home and teleconferencing, as a way of influencing staff behaviour.</p> <p>Policy TT9 of the 2011 Island Plan requires developments which would generate significant amounts of travel to be subject to a travel plan. It is considered that this policy is applicable to the current proposal to develop a new 5,900 m.² Police HQ employing several hundred people and generating vehicular and pedestrian traffic at Green Street.</p> <p>The Minister for Planning and Environment considers that travel plans should be submitted alongside planning applications to enable him to consider how sustainable transport opportunities are to be promoted and incentivised, monitored and delivered.</p> <p>In the absence of a travel plan submitted as part of a planning application, the Minister can give consideration to the extent of physical facilities for pedestrians and cyclists (such as showers, lockers and cycle parking) to be provided as part of the proposed new development; and can require the development, monitoring and enforcement of other aspects of a workplace travel plan through the use of planning conditions.</p>
14	<p>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.</p>	<p>See comment on Finding 13.</p>
15	<p>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.</p>	<p>See comment on Finding 13.</p> <p>The Minister for Planning and Environment can require, monitor and enforce aspects of a workplace travel plan through the award of conditional planning permission.</p>

	Findings:	Comment:
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.	See comment on Finding 3.
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.	<p>The current proposal is for an operational Police HQ including accommodation for offices, laboratories, specialist units and a 20 cell custody suite with basement operational parking provision: it is not a private office development and there are no published parking guidelines for a use of this type.</p> <p>In such circumstances, the Minister will consider the proposal on its merits having regard to the size and nature of the operation, its location, and its proximity to public car parks.</p> <p>In consideration of the proposal, the Minister will have regard to the planning policy framework provided by the Island Plan and, with specific regard to parking provision, Policy GD1(5) as follows:</p> <p>contributes, where appropriate, to reducing dependence on the car, in accord with Policy SP 6 'Reducing dependence on the car', and in particular;</p> <ul style="list-style-type: none"> (a) is accessible by pedestrians, cyclists and public transport users, including those with mobility impairments; (b) will not lead to unacceptable problems of traffic generation, safety or parking; (c) provides a satisfactory means of access, manoeuvring space within the site and adequate space for parking, (d) developments to which the public has access must include adequate arrangements for safe and convenient access for all and in particular should meet the

	Findings:	Comment:
		<p>needs of those with mobility difficulties.</p> <p>This will be one of a number of material considerations that the Minister will need to consider and weigh, relative to other aspects of the proposal, in his determination.</p>
18	<p>The Assistant Minister for Treasury and Resources was not prepared to answer questions on a rumoured proposal to retain a 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.</p>	<p>The Minister for Planning and Environment will only consider those matters that are included and disclosed as part of, and in response to, the planning application, together with those other material considerations such as the policy framework provided by the Island Plan and the Sustainable Transport Policy. All such matters pertaining to the determination of a planning application will be in the public domain.</p>
19	<p>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.</p>	<p>Proposal 12: St. Helier Regeneration Zones, identifies the Eastern Gateway as an area where the Minister may develop masterplans and development briefs for these areas and key sites within them.</p> <p>Snow Hill car park does not sit within the defined Eastern Gateway area of the 2011 Island Plan.</p> <p>The intensification of an existing off-street car park, of itself, is not considered sufficient to warrant the preparation of a masterplan for this area.</p>
20	<p>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.</p>	<p>The Minister for Planning and Environment notes the potential to phase a redevelopment of the whole publicly-owned site. This does not, however, feature in the current planning application that is before the Minister.</p>

	Findings:	Comment:
21	<p>The proposed location of 3 visitor car spaces at Snow Hill is not considered to be practical or satisfactory.</p>	<p>In consideration of the proposal the Minister will have regard to the planning policy framework provided by the Island Plan and, with specific regard to parking provision, Policy GD1 (5) as follows:</p> <p>contributes, where appropriate, to reducing dependence on the car, in accord with Policy SP 6 ‘Reducing dependence on the car’, and in particular;</p> <ul style="list-style-type: none"> (a) is accessible by pedestrians, cyclists and public transport users, including those with mobility impairments; (b) will not lead to unacceptable problems of traffic generation, safety or parking; (c) provides a satisfactory means of access, manoeuvring space within the site and adequate space for parking, (d) developments to which the public has access must include adequate arrangements for safe and convenient access for all and in particular should meet the needs of those with mobility difficulties. <p>This will be one of a number of material considerations that the Minister will need to consider and weigh, relative to other aspects of the proposal, in his determination.</p>
22	<p>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>	<p>In consideration of the proposal the Minister will have regard to the planning policy framework provided by the Island Plan and, with specific regard to the impact of development upon adjacent residents and parking provision, Policy GD1 (3) and (5) as follows:</p> <p>3. does not seriously harm the amenities of neighbouring uses and should, in particular:</p> <ul style="list-style-type: none"> (a) not unreasonably affect the level of privacy to buildings

	Findings:	Comment:
		<p>and land that owners and occupiers might expect to enjoy;</p> <p>5. contributes, where appropriate, to reducing dependence on the car, in accord with Policy SP 6 ‘Reducing dependence on the car’, and in particular;</p> <p>(a) is accessible by pedestrians, cyclists and public transport users, including those with mobility impairments;</p> <p>(b) will not lead to unacceptable problems of traffic generation, safety or parking;</p> <p>(c) provides a satisfactory means of access, manoeuvring space within the site and adequate space for parking,</p> <p>(d) developments to which the public has access must include adequate arrangements for safe and convenient access for all and in particular should meet the needs of those with mobility difficulties.</p> <p>In the consideration of these matters the Minister will give due weight to the comments of the highway authority.</p> <p>This matter will be one of a number of material considerations that the Minister will need to consider and weigh, relative to other aspects of the proposal, in his determination.</p>
23	The proposal that parking for disabled visitors be shared with a goods delivery bay is unacceptable.	See comment on Finding 21.
24	<p>Road safety hazards are potentially created by:</p> <ul style="list-style-type: none"> • the proximity of the proposed main entrance of the Police HQ to the Green Street roundabout 	<p>In consideration of the proposal the Minister will have regard to the planning policy framework provided by the Island Plan and, with specific regard to parking provision and access arrangements, Policy GD1 (5) as follows:</p>

	Findings:	Comment:
	<ul style="list-style-type: none"> • 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>contributes, where appropriate, to reducing dependence on the car, in accord with Policy SP 6 'Reducing dependence on the car', and in particular;</p> <ul style="list-style-type: none"> (a) is accessible by pedestrians, cyclists and public transport users, including those with mobility impairments; (b) will not lead to unacceptable problems of traffic generation, safety or parking; (c) provides a satisfactory means of access, manoeuvring space within the site and adequate space for parking, (d) developments to which the public has access must include adequate arrangements for safe and convenient access for all and in particular should meet the needs of those with mobility difficulties. <p>In the consideration of these matters the Minister will give due weight to the comments of the highway authority.</p> <p>This matter will be one of a number of material considerations that the Minister will need to consider and weigh, relative to other aspects of the proposal in his determination.</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	Accept	<p>The Minister for Planning and Environment will consider the evidence included in this report and, where relevant and appropriate, ensure that it is material to his determination of the planning application P/2012/1005.</p> <p>The Minister notes the differing views with regard to the potential impact of the proposed development upon the availability of public off-street long-term parking provision and will have regard to this relative to other matters, such as the extent of public off-street parking capacity elsewhere and the objectives of the STP.</p>	
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	Accept	<p>The Minister for Planning and Environment considers that the Department of the Environment should be engaged at the earliest opportunity in the planning of major public development projects and will continue to strive to ensure that this is the case.</p> <p>In so doing, however, the Minister will remain mindful that any prior involvement by him or his Department does not prejudice the consideration of any subsequent planning application which must be subject to the due process of public scrutiny and be determined, in an impartial manner, having regard to all material considerations that apply to it.</p>	

	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
3	To address the major concerns about the significant adverse impact of the proposed development of the development on public car 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.	TTS T&R	N/A	N/A	
4	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 same time providing dedicated parking for visitors to the Police HQ and adequate space for non-operational police use,	T&R TTS ENV HA	Neither	It is inappropriate for the Minister for Planning and Environment to comment upon other proposals to provide additional public off-street long-stay car parking provision, dedicated parking space for visitors and additional non-operational space at this time, as it remains for the Minister to determine whether the current planning application makes sufficient provision in these respects.	

	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
	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	Accept	<p>The Island Plan already proposes that a masterplan might be prepared to guide the regeneration of this part of St. Helier during the Plan period (to 2020).</p> <p>The Minister for Planning and Environment does not, however, consider that the redevelopment of part of Green Street car park to provide a Police HQ or the intensification of existing car parks at either Snow Hill and/or Green Street, individually or collectively, necessitate the preparation of a masterplan for the wider area, or that the absence of a masterplan precludes consideration of such proposals.</p>	
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	Neither	It is inappropriate for the Minister for Planning and Environment to comment upon other proposals at this time, as it remains for the Minister to determine whether the current planning application makes sufficient provision in these respects.	
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	N/A	N/A	
8	The proposal that parking for disabled visitors be shared with a goods delivery bay should be reconsidered.	T&R HA	N/A	N/A	

	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
9	<p>Further consideration should be given to possible road safety hazards created by:</p> <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	Neither	<p>In consideration of the proposal the Minister will have regard to the Island Plan and Policy GD1 (5), as follows:</p> <p>contributes, where appropriate, to reducing dependence on the car, in accord with Policy SP 6 ‘Reducing dependence on the car’, and in particular:</p> <p>(a) is accessible by pedestrians, cyclists and public transport users, including those with mobility impairments;</p> <p>(b) will not lead to unacceptable problems of traffic generation, safety or parking;</p> <p>(c) provides a satisfactory means of access, manoeuvring space within the site and adequate space for parking,</p> <p>(d) developments to which the public has access must include adequate arrangements for safe and convenient access for all and in particular should meet the needs of those with mobility difficulties.</p> <p>In the consideration of these matters the Minister will give due weight to the comments of the highway authority.</p> <p>This matter will be one of a number of material considerations that the Minister will need to consider and weigh, relative to other aspects of the proposal, in his determination.</p>	

	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
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		In consideration of the proposal the Minister will have regard to the planning policy framework provided by the Island Plan and, with specific regard to access arrangements, Policy GD1 (5) as follows: In the consideration of these matters the Minister will give due weight to the comments of the highway authority.	

CONCLUSION

The Minister for Planning and Environment remains grateful to the Environment Scrutiny Panel for carrying out this further investigation into the traffic and parking impacts of the Police HQ the findings of which, where relevant and appropriate, will be material to his determination of the planning application P/2012/1005.

In view of the outstanding determination of this live planning application, it is inappropriate for the Minister to provide any definitive and binding statement on the outcome of much of the Panel's findings, as it remains for him to consider all of the factors that are material to the planning application which he is due to consider shortly.