



Environment Scrutiny Panel

Green Street Police HQ: Traffic and Parking



Presented to the States on 28th February
2013

S.R.3/2013

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Chairman's foreword

The announcement of the new Police HQ on the site of the popular Green Street car park has been met with significant criticism by the public. When the Environment Panel first questioned the Minister for Planning and Environment at quarterly hearings about the implications of the project upon St Helier, we learned that this project had by-passed the master planning process. However we believed that the Minister had the prime responsibility for solving these major planning issues and he should be left to do so. A look at the public comments on the planning application website shows these are still unresolved.

The intervention by Deputy Martin seeking a States decision to halt the project prompted the Panel to take on the task of investigating these concerns over car parking and traffic. Our report has been produced in a short timescale and our work was constrained but we have achieved what we set out to do. We have produced an objective and rational assessment of the adverse impact of this project upon public car parking and traffic to assist the States in reaching its decision and the Minister in dealing with the application.

Our findings are significant. The development provides no on-site non-operational parking within the Police HQ development and relies entirely on the immediate availability of public car parking spaces. We believe that were this application for a private office development of similar size, provision of some on-site non operational car parking would be required. This omission will potentially result in a loss of 30% of the publicly available parking spaces in Green Street car park and a reduction to below the Island Plan threshold of public parking spaces. The development also makes inadequate and unsatisfactory visitor and disabled access arrangements and has adverse effects on traffic flows and road safety.

However, we believe that abandoning the project at this late stage would carry with it significant financial consequences. We recognise States members will need to weigh the critical findings in our report against other considerations including the long overdue need for the States of Jersey Police to have a new centre of operations.

Therefore in framing our recommendations we have tried to suggest a possible solution to overcome this dilemma. We have proposed that the plans should be progressed as part of a phased scheme for the re-development of the existing car park with the proposed Police HQ. This would provide the opportunity to replace the car park spaces which are lost, provide dedicated parking for visitors to the Police HQ and adequate space for non-operational police use, including facilities for motorcycle and cycle parking. This could solve all

outstanding issues and potentially provide parking spaces more economically than the recently announced proposals for Snow Hill.

It would result in a delay to the project while the necessary technical and financial feasibility studies are carried out into the various options, but will avoid the damage from piecemeal development and should result in a much better long term solution for St Helier.

A handwritten signature in black ink, appearing to read 'John Young', with a stylized flourish at the end.

John Young

Chairman, Environment Scrutiny Panel

Background

An urgent review

The Environment Panel launched this review of traffic and parking issues arising from the proposals for the new Police Headquarters in Green Street as a matter of some urgency on 14th January 2013. The Education and Home Affairs Scrutiny Panel had presented its report (S.R. 19/2012) on the Relocation of Police Headquarters to Green Street Car Park on 16th November 2012. However, while this covered other matters arising from the proposals in some detail, representations from other States Members and members of the public suggested to the Environment Panel that further scrutiny of the potential impacts on traffic and parking in and around Green Street and the wider town area was required.

Timing and public hearings

The Panel initially aimed to complete its review and present a report to the States in time for the rescheduled debate on Deputy Judith Martin's Proposition (P.92/2012) on 19th February 2013. With this in mind a number of public hearings were arranged for the week commencing 21st January. The Panel's first hearing was with the Minister for Transport and Technical Services on Wednesday 23rd January. Further hearings with the Minister for Planning and Environment, Mr R Le Brocq, Mr G N Blake (St Helier Parish Roads Committee), the Connétable of St. Helier and the Minister for Home Affairs took place on Thursday 24th. Finally, a hearing with the Assistant Minister for Treasury and Resources took place on Wednesday 30th January.

The day before this last hearing, the Panel was informed by Deputy Martin that she had asked for the debate on her proposition to be delayed by 2 weeks, until the States Sitting on 5th March 2013; this was subsequently accepted and the debate was again rescheduled.

1. Terms of Reference

Environment Scrutiny Panel

Green Street Police HQ: Traffic and Parking

This review will examine available evidence in respect of parking and traffic modelling relevant to the planning application for the proposed new Police Headquarters in Green Street Car Park.

Terms of reference

1. To review evidence available from the Transport and Technical Services Department or other sources of information (such as expert consultants' reports) on traffic modelling and parking strategies relevant to the Green Street application
2. To consider whether the evidence indicates that current proposals may have unacceptable impacts when measured against the general policies included in the Island Plan 2011 and the States Sustainable Transport Policy.

The Panel will report its findings to the States.

2. Panel membership

The Environment Panel is constituted as follows:

Deputy John Young of St. Brelade (Chairman)



Deputy Steve Luce of St. Martin (Vice Chairman)



Connétable Phil Rondel of St. John (Member)



Deputy Jeremy Maçon (co-opted for this review)



Officer support: M. Orbell

3. Key Findings

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.
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, 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.
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.
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.
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.
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.
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.

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).
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 8.00-9.00am, 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.
10. Owing to their shift working patterns much of the car parking by police staff is likely to occur from shortly before 7.00am 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.
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.
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.
13. Island Plan policies require travel plans to be produced for all major developments with significant traffic and parking impacts before the Planning Minister 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.
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.

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.
16. Based on the above, assumptions of the impact of the Police HQ on car parking as submitted to the Minister of Planning and Environment are considered unreliable.
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 sq metres, designed to accommodate 330 staff to include no non-operational on-site parking provision at all.
18. 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.
19. The recent announcement by TTS of a project to expand Snow Hill car park highlights the requirement for master planning 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.
20. It is known that the structure of Green Street car park will require substantial repair and capital investment within seven 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 uncoordinated way.
21. The proposed location of 3 visitor car spaces at Snow Hill is not considered to be practical or satisfactory.

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.
23. The proposal that parking for disabled visitors be shared with a goods delivery bay is unacceptable.
24. Road safety hazards are potentially created by:
 - 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.

4. Recommendations

Major Issues

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.
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.
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.
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, including facilities for motorcycle and cycle parking.
5. It is also recommended that a master planning exercise be carried out for the Eastern Gateway area of St Helier to ensure that all future development proposals in the area are properly coordinated and take the wider needs of the town fully into account.

Detail Issues

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.
7. Consideration should be given to locating motorcycle and cycle parking for police staff elsewhere, possibly within Green Street car park.
8. The proposal that parking for disabled visitors be shared with a goods delivery bay should be reconsidered.
9. Further consideration should be given to possible road safety hazards created by:
 - 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.
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.

5. Car Parking

5.1 Public parking in Green Street and the surrounding area

Green Street car park currently comprises 608 car parking spaces and a small area dedicated to motorcycle parking. The car parking is spread over four floors within the building and an external area at lower ground level to the south. The car park is designated and primarily used during the week as a commuter facility, mostly by people working in the east of town.¹

Evidence presented to the Panel indicates that on weekdays Green Street is usually full between 8.00am and 9.00am and thereafter remains full all morning. However, some spaces are generally vacated from lunchtime or mid-afternoon onwards, so that there is increasing availability for other users during the afternoon.²

Overnight and at weekends usage falls considerably, leaving ample space for local residents. The majority use on Saturdays is by shoppers; evidence submitted by the Transport and Technical Services Department suggests that some 350-400 spaces typically remain available at Green Street both at night and on Saturdays and Sundays.

The nearest public car parks in the surrounding area are Snow Hill, which has 84 car spaces dedicated to short-stay shopper parking, a further 50+ spaces for motorcycles, and a small number of places reserved for States Members; and the Route du Fort/Cleveland Road car park, with a capacity of 81 long-stay commuter spaces for cars. Snow Hill is extremely popular with shoppers and therefore is often full during the day, with drivers queuing for spaces at busy times. Cleveland Road (only a short walk beyond Green Street for motorists wishing to access the town area) usually has 20 or more spaces unfilled during the day.

Public on-street parking in the local area is limited. Evidence from the St. Helier Parish Roads Committee suggested that the lack of on-street parking rendered it impractical to introduce a residents' parking scheme in the area.

¹ TTS Green Street Car Park Survey, November 2012: 76% of users' final destinations were in the east of town

² Some slight variation has been seen in these times depending on the source; TTS have pointed out that Green Street now fills slightly later in the morning as a result of office development in the Esplanade area

5.2 Parking provision in town

There are currently 3,935 public car park spaces¹ in the town area, of which some 900 are short-stay shopper parking spaces. Added to this a variety of on-street parking spaces with differing time restrictions brings the total number of public parking spaces in the town area to approximately 5,000. Private parking adds another 3,500 residential and 7,000 non-residential spaces.

The Council of Ministers' comment on P.92/2012 points out that Pier Road car park normally has some 250 spaces for commuters unused every day, a statement supported by TTS during the Panel's review. TTS also pointed out that public parking demand can be met in different ways. For example, following the loss of some 400 public commuter spaces (and a further 230 private spaces) at Gas Place due to the construction of the Town Park, only 190 additional spaces were initially provided at Ann Place. The department suggested that this may have led to a change in parking behaviour:

Chief Officer, Transport and Technical Services:

We had a massive shift and what happened is people modulated their behaviour. We hope some of them started commuting using motor cycles or bicycles or walked to work or used the bus, but a lot of people went elsewhere. The reality with Jersey, and it is a bit of a shock to people, is you can walk across St. Helier in 10 minutes. I used to commute to Leeds city centre and walk 12 minutes across Leeds city centre from where I parked to where my office was. That is what people do in cities and towns and that is what people do here if that convenient place is not available. So I think you have got to look at the car parking provision in the round and not focus on just one car park. Ideally we would surround the city centre with so many car parks that you cannot see anything else but the reality is that is not what we are going to do. We have got a vision now. We have got a Sustainable Transport Policy, we have got a better bus service, we are promoting other forms of transport, and we are getting people to be innovative in how they travel into their workplace. It is all part of the round. Your original question, Deputy, about is this a detrimental effect to our car parking on that car park, the answer is yes, but can we cope with that, the answer is yes, and the other priorities for the States of Jersey are viewed as higher.²

¹ Figures provided at public hearing with Minister for Transport and Technical Services, 23rd January 2013

² Public hearing with Minister for Transport and Technical Services, 23rd January 2013

5.3 North of Town Master Plan

Despite this apparent willingness amongst members of the public to adapt their parking habits, there are still important questions to be asked about the future of parking in St. Helier. The Council of Minister's comment on P.92/2012 states:

The approved North Town Master Plan proposes that the parking lost at the Town Park will be replaced by provision at various private developments in that area and by underground car parking at Ann Court and Minden Place.

Transport and Technical Services Department Policy Comments (dated 14th January 2013) supplied as part of a package of evidence to the Panel on the Police HQ application confirmed that the North of Town Master Plan included provision that would replace and indeed eventually increase the overall level of public parking, by requiring major private developments in the area to provide public car parking spaces. Four major sites (with proposed parking provision) were listed as follows:

- Jersey Gas, Tunnel Street - 138 spaces
- Le Masurier's Site, Bath Street - 210 spaces
- Ann Street Brewery site - 110 spaces
- Ann Court - 185 spaces.

The Panel is concerned that proposals for the private development expected to provide the largest number of new spaces (the Parkside Village project by Le Masurier Ltd. in Bath Street) were still included in these departmental comments in January 2013, when the company concerned had made very public announcements in late November 2012 that the project would not be going ahead, following difficulties experienced with the planning process.

5.4 Parking policy in the Island Plan

Within the 2011 Island Plan, parking provision in town is conditioned by the States approval of the Sustainable Transport Policy in 2010. The over-arching aim of that policy is to reduce peak hour congestion on the Island's roads by 15% by 2015, a target intended to reproduce on a permanent basis the lower level of traffic flow experienced during school holiday periods.

The Sustainable Transport Policy proposed that provision of short-stay shopper parking in town should be increased, while long-stay commuter parking should be limited or reduced.

The plan envisaged biennial monitoring of progress towards the overall target of traffic reduction, with the successful delivery of change expected to be closely linked to improvements in public transport.

The Island Plan policy for any new public parking is based on the provision of facilities on or close to the St Helier ring road, ensuring convenient access (within 300-500 metres) to the centre of town, while discouraging unnecessary vehicle movements through the heart of St Helier. Island Plan Policy TT10 covers off-street public parking provision in St Helier (see Appendix 1). The first paragraph states:

In order to contribute towards the objective of reducing peak hour congestion by 15%, planning permission for new additional off-street public parking spaces will not be permitted in the Town of St Helier unless the total level of public off-street car provision falls below 4,000 spaces (2009 levels), or where the provision of public off-street space is provided in lieu of the loss of private off-street parking provision.

The total level of public off-street car provision is currently below 4,000 spaces (at 3,935) and would fall to 3,844 if the Green Street proposals go ahead.

The policy subsequently refers to:

- the provision of off-street public parking at key development sites in the north of the Town - such as at Bath Street; Jersey Gas and Ann Street Brewery - to provide up to 450 public spaces.

The withdrawal of development proposals for Bath Street reduces the 450 public spaces to be provided in that area to 240; although as some of the land involved currently provides substantial amounts of private parking this might continue to offer an alternative for those prepared or able to pay private parking charges.

To gain some idea of progress with the Sustainable Transport Policy, the Panel also asked the Minister for TTS about progress with the new bus service.¹ Members were informed that data was not yet available, but it appeared that ridership for the month of January had been good. The Panel was advised that Route 15 now passes through the Fort Regent Tunnel, and as a result of earlier scheduling people living in the south of the Island would now be able to get to the Green Street area by bus in time for a 7.00am shift. It was suggested that earlier services would be rolled out over time to other routes across the network. Since the

¹ Public hearing with the Minister for Transport and Technical Services, 23rd January 2013

Minister made this comment the bus company has announced that the extension of the 15 route has proved impractical and will be discontinued.

5.5 Impact of the proposals on commuter parking

Plans for the new Police HQ involve building over the whole of the lower open air parking area of the Green Street car park. The new building would result in the loss of 91 car spaces from the total of 608 currently available in the existing car park. This would amount to the loss of roughly 2-3% of the total provision in public car parks in town, depending on whether it is compared with the total stock or only dedicated commuter spaces.

As noted in Section 5.1 above, the impact of these proposals would fall largely on commuters who work in the east of town, who make up the majority of motorists using Green Street during the working day. However, the loss of 91 parking spaces does not cover the full extent of the problem. As explained during public hearings with the Minister for Home Affairs (24th January 2013) and the Assistant Minister for Treasury and Resources (30th January 2013), the number of staff working at the Police HQ would also have an impact, although the Ministers maintained that this was likely to be relatively small as there was a low percentage of car use amongst States of Jersey Police staff compared with other groups. The Panel looked for evidence to support this argument.

5.5.1 Staff survey

An internal staff survey was carried out by the States of Jersey Police in October 2011 in order to provide information regarding staff travel and transport arrangements. The survey was posted online and was only available for 4 days, between 4th and 7th October 2011. The survey was compiled using proprietary software. 181 members of staff completed the survey (out of a total complement of 240 police officers and 90 civilian staff members), giving a response rate of 54.8%. The results of the survey were considered to be representative by the departments involved (Home Affairs and Property Holdings), although the Panel considered that if more time had been allowed for staff to complete the survey a bigger response could have added weight to the results.

At the public hearing with the Assistant Minister for Treasury and Resources on 30th January 2013 the Panel was offered access to the survey results, which were delivered on Friday 8th February, initially in the form of a hard copy print-out of spreadsheets which were not conducive to analysis. Electronic copies and access to the full survey results were requested on 12th February 2013 and these were subsequently provided.

5.5.2 Transport assessment: increase in parking demand

Consultants employed by Property Holdings (Ove Arup and Partners Ltd.) were commissioned to produce a transport assessment to accompany the planning application for the proposed Police HQ. The Jersey Police Headquarters Transport Assessment (dated 2nd August 2012) referred to the police staff survey and in respect of parking demand concluded that the maximum demand for cars would be for 86 vehicles, plus 46 motorcycles and 46 bicycles.

The results appeared to show that staff at the existing Police HQ in Rouge Bouillon were significantly less dependent on car use for travelling to and from work than other workers. Of those normally travelling during peak hours, the assessment stated that only 39% of respondents used a car, with 21% using motorcycles, another 21% cycling, 14% walking and 5% using a bus. According to the TTS Transport Policy Comments submitted in response to the planning application the average car use Island-wide is 56%.

As about 20 police staff already used public parking as opposed to other arrangements, the transport assessment interpreted the impact as an 'effective increase in parking demand for public car parking spaces' of only around 65 spaces. This figure was considered to be reliable by TTS; during the public hearing on 23rd January it was referred to specifically:

Deputy J.H. Young:

So there will be a shift to the east as a result of the project? There will be more spaces created out west?

Manager, Transport Policy:

Yes, that is correct.

Deputy J.H. Young:

But there is an impact east of the tunnel of that sort of order, 169?

Manager, Transport Policy:

Yes. My numbers would be slightly less than that. The total impact on public parking is estimated in the traffic assessment to be about 65.

Connétable P.J. Rondel of St. John:

It is 100 less.

Manager, Transport Policy:

Sorry, the 65 is by the increase in demand from police officers and then there is a 91 reduction in parking spaces. So if you add the 2 together it is of the order of 150.

Deputy J.H. Young:

So it is thereabouts, 150 to 160, by their own estimations. But of course would you accept that when it rains, in adverse conditions it could be a lot worse?

Manager, Transport Policy:

Yes. Not as much as people expect, and we have looked at that, but you get an increase in demand. The reality is that Green Street car park is already full so people have to choose where they are going to park when they commute into town, if they want to come by car.

5.5.3 Analysis of survey results: a greater impact?

As noted above the Panel asked for and was provided with detailed information relating to the internal police survey. Initially this was received directly from the States of Jersey Police; subsequently the consultants confirmed that the information they had been given was essentially the same as that provided to the Panel. This consisted of a rather complex 'summary sheet' showing details about police car parking and travel as at 17th October 2011. It was explained by Arup that in fact they had received an earlier version of the summary sheet dated 11th October, but the later version had been adjusted to show the effect taking into account all 330 staff, as opposed to the surveyed results only. The Panel was also told that at the time of the transport assessment work the consultants only had the summary document, not the full details of the survey results, but it was felt that these were not needed to carry out the assessment work as the summary sheets represented the same data.

The Panel is concerned that despite its best efforts it has not been able to accurately correlate figures presented in the summary sheet(s), either with the conclusions presented in the Arup Transport Assessment or with the detailed survey data. Despite contacting the consultants for clarification there appeared to be no clear explanation for the figures presented in respect of trip generation or parking demand. The Panel was told that:

For cars, the trips generated were calculated on the basis of surveys (sic) of future police travel patterns provided by Jersey Police, which indicated that of the 220 staff on site at any one time, a figure of around 191 staff would arrive in the peak hour. On the basis of police figures, some 39% of these would be travelling by car, which gives 75 vehicles per hour.¹

The Panel's own examination of the detailed survey results does not coincide with the conclusions presented by the consultants. In the absence of any clear explanation as to how they were calculated, the Panel therefore considers that they should be treated with caution.

For example:

- at the time of the survey just under 50% (not 39%) of staff surveyed stated that they normally travelled to work by car. Adjusted to take account of the 'normal' complement of 220 staff on site at any one time, this would suggest that 109 staff used a car
- asked whether they normally travelled to work by car, motorcycle or moped during the 'morning peak travel time (07.30am-9am Monday-Friday)' the result (including all respondents, even if they did this rarely) was just over 80%, suggesting that around 176 staff might arrive during these hours
- it is noted that the table in the transport assessment entitled 'Staff Trip Generation and Mode-Share in Peak Hour' gives percentage mode shares and suggested trip generations not just for car and motorcycle/moped use but also for staff cycling, walking and taking the bus. As these means of transport were not included in the specific questions about peak hour travel it is not known how these numbers were arrived at
- the Panel was also informed at hearings that a significant number of police staff begin work at 7.00am, so it is again unclear how much reliance can be placed on these figures.

During a telephone conversation intended to obtain clarification on these matters the consultants stated that the situation was slightly complex, and that the figures presented were in any case forecasts but appeared to be reasonable. It was agreed that the total number of staff parking at Green Street could be higher or lower than the predictions, with the possibility of numbers over 100 not being ruled out.

¹ Email received 19th February 2013: Responses to Questions for Arup re Green Street Police HQ Application

Given the lack of explanation for the calculations and confirmation that the detailed survey information was not analysed by the consultants or used by them in producing their transport assessment, the Panel considers that the Arup assessment of the increase in demand for public car parking space is potentially misleading. Relevant points include:

- the 'standard' day shift for staff at Police HQ begins at 7.00am.¹ Police and civilian staff arriving at this time would therefore be amongst the first arriving at Green Street car park, and would be able to park without difficulty before it began to fill up, which was reported by TTS at the public hearing to happen between 8.00am and 9.00am
- as there is no provision in the proposed plans for any car parking for staff within the HQ building, excluding other factors it seems likely that all of those travelling by car will relocate to Green Street
- the consultants appear to accept that there may be significant variation in the numbers of staff expected to park at Green Street at different times, so the 'absolute maximum parking demand' quoted in their assessment as 86 cars could well be exceeded
- staff currently paying for private spaces would be likely to use public parking spaces at Green Street, assuming these would be significantly cheaper.

The net effect of this would therefore be to reduce the spaces available to existing users of the car park by the 91 spaces physically lost, plus an additional number that would depend on how many police staff travelled by car on any particular day; this figure could be expected to be at least 86 and might rise to over 100, potentially leaving nearly 200 fewer spaces available for other motorists. This amounts to nearly 30% of the existing capacity of Green Street, or around 5% of total public parking provision in St Helier; both substantially larger than the figures reported by Arup and apparently accepted by TTS.

5.5.4 Parking guidelines

At the public hearing with the Minister for Planning and Environment the Panel's attention was drawn to parking guidelines produced by the Minister for Planning and Environment² covering differing types of residential, commercial and public development in St Helier. The Panel therefore looked at the guidance to see what level of non-operational parking for staff and visitors a commercial development of a similar scale to the proposed Police HQ could

¹ Public hearing with the Minister for Home Affairs, 24th January 2013

² SPG Policy Note 3, 1988: Parking Guidelines

be expected to provide. It found that the extent of car parking provided on site is partly dependent on the proximity of public car parking, and each case is considered on its merits. Where there are no public car parks nearby Planning would expect the applicant to maximize on-site parking space.

The Panel considers that if the new Police HQ had been planned to be built next to the Pier Road car park then the fact that no non-operational staff and visitor parking is proposed within the development might be acceptable, given the recognition that a large number of spaces remain available for most of the time in that public car park. However, in the case of Green Street it would appear unreasonable to suggest that proximity to a public car park should be taken into account, as the evidence clearly shows that there is no space available in Green Street that could be used by staff and visitors to the new development without displacing current users, even before the loss of 91 spaces to make room for the new Police HQ building.

It is understood that parking provision for new developments is increasingly considered by Planning in the light of the TTS Sustainable Transport Policy approved by the States in late 2010, so the guidelines are not rigidly adhered to; however the Panel believes that comments about parking provision contained in the former Environment Scrutiny Panel's report on the Sustainable Transport Policy (S.R.13/2010) are still relevant.

That report (presented to the States on 12th November 2010) noted that any significant reduction in parking provision could simply exacerbate current parking problems, unless it went hand in hand with a real reduction in car commuting. The Minister for TTS was unable to confirm at the public hearing on 23rd January 2013 that any significant reduction had yet occurred in response to initiatives contained in the Sustainable Transport Policy.

The report pointed out that there was no evidence of public support for a reduction in public commuter parking, as well as highlighting uncertainties over major development projects and how much they might affect public parking availability. It also focused attention on the possible option of increasing the cost of parking above inflation to 'encourage' commuters to adopt alternative means of transport. The Panel commented on the lack of alternative provision in the Island, compared with elsewhere:

The Panel believes that the cost of parking should not be increased above inflation to 'protect and improve' a notional differential between parking and bus fares unless a broad range of alternatives is already in place. In the UK the choice may include bus, coach, underground and train services, park and ride arrangements, cycle and walking networks, affordable taxi services, or car sharing schemes. The Panel believes Jersey has a very long way to go to improve its travel infrastructure before making parking less affordable can be justified.¹

Physically reducing the availability of public parking (by reducing the number of spaces available in Green Street) could be compared with increasing its cost; both have the effect of forcing motorists to change their habits. The alternative relied upon most heavily to promote 'modal shift' in the Sustainable Transport Policy is improvement to the bus service. However, it is clear that sufficient improvements have not yet been made to public transport to allow people a reasonable choice of how to get to work from different parts of the Island. Questioning during the public hearing with the Minister for TTS suggested that people living in the south of the Island enjoyed a service that would enable staff to get to the proposed site of the new Police HQ by 7.00am, but providing earlier services to help people get to work would be rolled out to the rest of the network 'over time'. The Minister was nevertheless confident that this would happen:

The Minister for Transport and Technical Services:

I will always use the carrot before the stick with people and I am confident that the bus service will improve in leaps and bounds. It is my vision that unless somebody particularly wants to use a car they will not have to in the very near future, that the whole Island will be saturated. With a double decker bus now you can go from the airport to Le Marais and vice versa and that cross-town, cross-tunnel service seems to be very valuable and going down very well with the general public.

The Panel was naturally disappointed to learn subsequently that changes proposed to the new bus network by the operator may in fact reduce or remove the opportunity for those living in the south of the Island to access the Green Street area directly by bus.

The Panel also learned that the trial of automatic number plate recognition (ANPR) technology in Sand Street car park had revealed that some people were prepared to pay massively increased parking charges (£21 per day) to have the ability to park their car where it was most convenient for them. This was cited in the Council of Ministers' Comments on

¹ Sustainable Transport Policy Review, 12th November 2010; pp. 30-31

P.92/2012 as an opportunity that might allow for more flexible parking arrangements. However, the Panel notes that this could only provide a real alternative for people who were prepared to pay a premium price (equivalent to the cost of renting a private parking space) for their day-to-day parking needs. This is not therefore felt to be a realistic option for most people, and could even be seen as a precursor for an overall increase in parking charges; something that the Minister for TTS claimed he would not support unless 'carrot' measures have been tried first.

The Panel considers that there is a strong possibility that moving the Police HQ right next to a large public car park is likely to have the effect of prompting staff who previously used other forms of transport (because of parking constraints around the Rouge Bouillon site) to re-think their travel preferences in a different direction to that intended by the Sustainable Transport Policy, which could potentially create an even bigger impact on public parking. However, even if only the 50% of staff who answered in the survey that they normally travelled by car were reflected in parking demand at Green Street, the impact could result in 200 existing users potentially being displaced.

5.5.5 TTS Transport Policy Comments

Despite the above, TTS Transport Policy Comments submitted to Planning on the proposed development and the Arup Transport Assessment appeared to accept 65 extra vehicles as a valid estimate, suggesting that this can be accommodated in the system:

The relocation of the police station to Green Street is expected to increase demand for public parking by a maximum of 65 and therefore the loss of 91 spaces plus the increased demand can be accommodated in the overall stock, though car commuters may not be able to park at their car park of first choice (as may currently be the case).

(Emphasis added.)

These comments (supplied to the Panel as part of a pack of evidence on 15th January 2013, and described in the accompanying email as the department's formal response to the planning application) appear to have been sent to the Department of the Environment (Planning) by email only the previous day, despite the fact that the Transport Assessment for the application (produced by ARUP) was dated 2nd August 2012. The consultation period for the application began on 11th September 2012 and appears to have closed on 29th November 2012 ('end publicity date' recorded on the Planning website). A formal TTS submission to the consultation concerning drainage dated 21st August 2012 appears on the Planning website; there was no record of the department's formal comments on transport at the time of writing.

5.5.6 Other considerations

The issues raised above will add significantly to the importance of establishing an effective workplace travel plan for workers at the proposed Police HQ (see Section 5.7.2 below). However, at the public hearing with the Assistant Minister for Treasury and Resources on 30th January the Panel was told by the Assistant Minister that the Planning Department had indicated in March 2012 that a travel plan:

... would not be required with the application but it would be a condition of the application prior to occupying the building. That has been reconfirmed to us in the last few days by the Planning Department.

This is also a matter of some concern to the Panel, as it appears to contradict a clear direction in the Island Plan (paragraph 8.88) that:

... travel plans should be submitted alongside planning applications which are likely to have significant transport implications.'

(Emphasis added.)

The idea that a major development designed to cater for a total of over 300 employees might not be considered by Planning to have significant transport implications seems highly questionable, to say the least; when linked to the apparent late delivery of the TTS Transport Policy Comments the Panel is led to the conclusion that the travel plan has received less attention than it deserves, for whatever reason.

5.6 Impact on shopper and overnight parking; Snow Hill proposals

Given the reduction in the number of available spaces at Green Street during the working day, and the parking impact of police staff who would be working there, it seems very likely that the current situation where some spaces become available from early afternoon and can be used for shopping or other purposes would change significantly once the new Police HQ is built. TTS maintain that the reduction of spaces at Green Street would only impact on commuters,¹ although the results of their own survey of usage of Green Street car park (carried out in November 2012) identified 13% of non-work related parking, including 5% 'nearby residents' and 3% shoppers. This may offer some additional justification for pursuing the recently announced proposals for an additional deck of shopper parking at Snow Hill, which coincidentally could provide almost exactly the same number of new spaces (90) as are going to be lost at Green Street.

¹ TTS Transport Policy Comments, 14th January 2013

Should that project be approved it would significantly improve the facilities available to weekday shoppers (especially in the mornings, when Green Street is invariably full). However, the Panel believes that the Green Street and Snow Hill proposals should not be considered in isolation. Effectively removing 177 or more commuter spaces from the area while considering the possibility of adding another 90 shopper parking spaces clearly implies major change, which members believe would benefit from a more joined-up approach to planning than has been taken so far. Members consider that the possible cost of building a new level of parking at Snow Hill could well be significantly greater per parking space than the cost of redeveloping Green Street car park to provide more spaces.

5.7 An alternative proposal

During a quarterly public hearing with the Minister for Planning and Environment on 3rd December 2012 the Panel questioned the Minister on the fact that no master planning exercise had been carried out for the Eastern Gateway area of St Helier (into which Green Street and Snow Hill fall), as would have been expected by the Island Plan before a major States development could take place. The Panel was reminded of this by pertinent comments made by representatives of the St Helier Parish Roads Committee, echoed by the Connétable, at the public hearing for the Green Street review on 24th January. It was suggested that a better plan might have been to consider redevelopment of the whole of the Green Street car park as part of a wider scheme with the new Police HQ proposals:

The Connétable of St. Helier:

I think that is why I started off by saying that I think Green Street car park needs to be redeveloped and expanded, because again, in an ideal world, if you wanted to pick up your kiddie from the police station, or any relative of any age, you would drive into the car park and there might even be a floor dedicated to people visiting the police station, and you would park up and you would go into the police station. But that is clearly the aspiration. We are not going to get it straight away if we move into this site, but as I say, we have been talking about knocking down this car park and building a better one, for years. I suggest that we get on with it.

Deputy J.H. Young:

Would you go as far as saying this should be seen as a phased development, ideally? All the vision that you have outlined could be enabled by the police headquarters on the front of the site and then a redeveloped car park with all the accessing and servicing meeting the requirements that you have set out, as phase 2?

The Connétable of St. Helier:

I think that certainly would have avoided the current problem we are having, the political problem, that if those bringing this proposition had realised the strength of feeling about the loss of car parking, even if we are just talking about 100-odd spaces, then they could well have brought it as a package of proposals which would be the new police station followed by a new car park, and they probably would not have a problem.

At the public hearing with the Minister for Transport and Technical Services the Panel was told that the department had looked at the possibility of increasing the capacity of Green Street by around 200-250 spaces some 10 years ago, but this had not been followed up. The Panel was also informed that while the car park is listed in the department's asset register as reaching the end of its useful life by 2020, that could be extended by the use of cathodic and other concrete protection measures.

Depending on the proposed timetable for the detailed planning application and construction of the Police HQ the Panel considers that there is an opportunity to create a co-ordinated scheme that could overcome concerns about loss of parking at Green Street, improve access to the Police HQ for visitors and staff, and incorporate the need for redevelopment of Snow Hill in an over-arching plan for the area. This would also facilitate forward thinking about traffic modelling, parking demand and the consequences of future decisions about other developments in the north of town and the Esplanade area. It could become part of a structured development plan for the Eastern Gateway, rather than an isolated (and potentially somewhat problematic) proposal designed purely with the needs of the States Police in mind.

The Panel considers that this could not only solve all outstanding parking issues found with the proposed Police HQ application, it may potentially provide parking spaces more economically than the recently announced proposals for Snow Hill. The additional costs should be considered against the substantial project costs which would be rendered abortive, if the Green Street project does not go ahead.

5.8 Proposed solutions

One obvious question in respect of the proposals, given that a significant number of commuters will inevitably have to change their parking habits, must be about where they will be expected to park in future. Various scenarios have been advanced as partial solutions to this, although none of the suggestions necessarily offers a complete solution on its own.

5.8.1 Pier Road

The answer clearly favoured by the Transport and Technical Services Department involves a displacement of commuters to Pier Road. This is seen as achievable because Pier Road is already a long-stay car park, it consistently has 250 or more spaces available during the working week, and is not seen as being so far from Green Street that it would prevent commuters moving there from accessing their place of work.

The Panel considers that while there may be a number of people for whom a move to Pier Road could be practicable, particularly those working in the centre of town who already walk a reasonable distance from Green Street, there may be many who would find it highly inconvenient. This is borne out by the results of the department's survey of Green Street users, carried out in November 2012, to which 264 responses were received. Amongst the findings:

- 88% felt that it was very important to be able to park at Green Street
- 86% of users chose Green Street because it was close to their workplace
- 76% worked in the east of town
- 71% would park in another public car park if Green Street was not available
- 65% felt that Pier Road was not at all a convenient alternative
- 29% felt that Pier Road was not a very convenient alternative
- 54% would choose Pier Road if they had to use another car park

While such a move might appear to fulfil some of the expectations of the Sustainable Transport Policy by encouraging people to walk at least part of the way to work to obtain some health benefits, it seems that it would not be popular with the commuters surveyed. The distances involved for anyone needing to walk all the way back to the Green Street area would be considerable, and the ability to access Green Street through the Tunnel would not be of any help to people obliged to park in Pier Road. The 76% who worked in the east of town included commuters working in the La Colomberie, Snow Hill and La Motte Street areas, which would also involve a walk of between 700-1000 metres from Pier Road for those motorists forced to relocate there. This would require a reasonable level of fitness and would expose commuters to the elements for a long time in poor weather conditions, as well as potentially adding anything up to a quarter of an hour to the length of their daily journey to work.

5.8.2 Workplace travel plan

Another possible measure (previously mentioned in Section 5.5.6 above) involves the adoption of a workplace travel plan by the States of Jersey Police in respect of the new HQ building. Workplace travel plans set out measures designed to increase the range of travel choices available to employees to support sustainable travel objectives, principally reduction in car usage and increase in alternative means of transport including public transport, walking and cycling. They are required under the Island Plan (policy TT9) for all new developments above a certain size, or which would generate significant amounts of travel. Sections 8.88, 8.89 and 8.90 of the Island Plan¹ establish the principles for application of travel plans.

As noted above, section 8.88 begins by stating:

The Minister for Planning and Environment considers that travel plans should be submitted alongside planning applications which are likely to have significant transport implications

Sections 8.89 and 8.90 go on to explain what should be contained in travel plans; how important it is that they are realistic; how much weight should be given to them in planning decisions; and consideration of how enforceable they are.

Given the importance attached to travel plans for large developments, and the requirement under the Island Plan that they should be submitted alongside significant planning applications, the Panel was surprised to hear from both the Minister for Planning and Environment and the Assistant Minister for Treasury and Resources during their respective public hearings that it had apparently been agreed that a detailed travel plan for the new Police HQ would be set as a planning condition for the new development, rather than considered in advance of determination of the application. The effect of this would be that the in-principle decision to permit the Police HQ to be built would have to be made in the absence of reliable information regarding future travel arrangements for staff.

This not only seems to contradict the intent of the Island Plan, but also it raises real questions about whether and when an adequate plan will be put in place, and whether it would eventually be enforceable on staff. Questioned on this point during the public hearing, the Assistant Minister for Treasury and Resources explained that his department understood the Transport Assessment provided by Arup with the application and subsequent comments on it by TTS were sufficient for planning application purposes:

¹ See Appendix 2

Deputy J.H. Young:

... Obviously what we shall be wanting to know is on what grounds the policy clearly set out in the Island Plan that says there will be such plans required as part of planning applications and that the Minister should have regard to the enforceability of the plan in deciding how much weight to give it in a planning decision ... we obviously want to know why it is felt that that is not the case.

Assistant Director, Property Holdings:

My understanding, Chairman, is that we have provided transport assessment information as part of our planning application that we submitted on 3rd August. My understanding, as we have not been asked for any more information and T.T.S. (Transport and Technical Services) have commented on it as part of the application process, is that is enough for them to make a planning application. The development of a workplace travel plan is very important and it is something that we will be doing.

However, the Deputy Chief of Police (at the same hearing) did not appear to feel that this would necessarily be a strictly enforceable document:

Deputy J.H. Young:

Perhaps I will move to the Deputy Chief Officer now, if that is all right, Assistant Minister. Enforceability of these travel plans, obviously they are your staff. Can you reassure the panel about how you can make that plan stick when it is introduced and how you can make sure that it is not just a piece of paper?

Deputy Chief Officer, States of Jersey Police:

Well, it is a very important document. I take your point. It is not an enforceable document as such. It has to be done by persuasion, negotiation and putting incentives in place and that is the work we need to do. We cannot mandate that people follow it but we can do whatever we can to encourage people to change their behaviours.

Deputy J.H. Young:

But will you consider offering incentives and disincentives and so on?

Deputy Chief Officer, States of Jersey Police:

We would have to look at that to see what we could do within the confines of the plan and the opportunities that present to us. Yes.

It was subsequently suggested by Property Holdings that the responsibility for producing a workplace travel plan was taken very seriously and that this was something that would have to be done before occupation of a new Police HQ, but its enforceability was ultimately up to the individual and would not be affected by whether it was put in place prior to planning permission being granted or as a condition of it. However, the Panel's view is that according to the Island Plan, the practicality and enforceability of a workplace travel plan are material to a decision on whether or not to grant planning permission in the first place, and therefore this should not be left until after a planning decision has been reached.

5.8.3 Serious doubts

There is considerable concern amongst the Panel about the risks inherent in deciding whether or not to permit a substantial development without robust information on travel and transport implications being available at the time. Further, it seems unclear whether the terms of any planning obligation subsequently applied to gain commitments from staff to a particular travel plan will be effective or enforceable. These points were discussed at the public hearing with the Minister for Transport and Technical Services:

Deputy J.H. Young:

... One of the planning policies about travel plans says that the Minister should form an opinion as to whether to rely on a travel plan or not on its degree of enforceability. The policy talks about incentives and so on. What I am looking for from you is what mechanics would you expect to be in place to make sure that the travel plan is not just a piece of paper, that it has some real teeth to achieve what is necessary in a major new building in this area, from what you have told us.

Manager, Transport Policy:

We will work with the Planning Department and, if I am honest, it is early days with forcing the private sector to have travel plans as a consequence of a planning permit. We need to work up a system that will give these things a better chance of working.

Deputy J.M. Maçon:

On this point, the key word there is being effective, an effective plan. This is Scrutiny; we have to ask for the evidence. Can you give us some sort of demonstration, either States sector or private sector, locally in Jersey where travel plans have been used where there is the evidence to back up that they are effective and enforceable?

Director of Transport:

They are relatively new to the Island in terms of measuring their effectiveness, but certainly we have done work with the Isle of Wight and looked at the effectiveness of travel planning with their schools and they have had notable successes. You would agree with that, would you not?

Manager, Transport Policy:

Yes. We have had some modal shift where we have been working with our own schools over here with their school travel plans.

Deputy J.M. Maçon:

But the answer to my question is you do not have any evidence to support that travel plans have been able to work locally, they are still new?

Manager, Transport Policy:

We have got some evidence at schools, not at offices.

In the Panel's view there appear to be two overlapping areas of doubt here that potentially could give rise to long term problems. It would seem unwise for a major development such as this to be permitted based on an un-evidenced assurance that any traffic or parking problems would be relatively minor, and could therefore be addressed later; a relative lack of experience with travel plans and their implementation could also mean that solutions may prove more elusive than expected.

5.8.4 Modal shift: expectations of police staff

There seem to be particularly high expectations in respect of the States of Jersey Police staff that they will be responsive to the concept of a travel plan, if only because the staff survey appears to demonstrate that they already embrace a variety of different modes of travel and seemingly make less use of the private car, compared to other groups in St Helier. These expectations may or may not be well-placed. From evidence received the Panel is aware that parking facilities at the existing Police HQ are very limited, which would be expected to have had a bearing on the mode of transport adopted by staff to date. While it could be relevant (as pointed out during the hearing with the Minister for Transport and Technical Services) that the police have a high proportion of young, fit people who may feel comfortable riding motorcycles and bicycles to work, it is equally possible that their preferences could change if the opportunity for easy car parking next to their place of work became a reality. No evidence has been seen to suggest that police staff are any more

environmentally conscious than other groups, so it seems quite possible that the relatively low levels of car use reported might not be through choice.

It may also be relevant to note that data from the States of Jersey Police survey suggested that numbers who would expect to use the bus to get to work after the move increased from around 4 to 35 staff. This presumably reflects comments made to the Panel during hearings that Rouge Bouillon is not well serviced by public transport links currently. However, it is not known how the predicted improved uptake of public transport may be affected by recent suggestions from the bus company that the new through route from the Airport to Les Marais has proved impractical and will shortly be dropped, or how this may affect the number of staff choosing to travel by car.

While this aspect of the survey results was not referred to in the Arup traffic assessment, it did report that the mode share of 'sustainable' travel was higher for police staff than is typical for St Helier, adding that increased numbers of staff were *'likely to use modes such as walking and cycling car trips'* (sic) when working at the proposed headquarters. In fact the survey results suggested that the number of staff walking could be expected to fall, from approximately 35 to just 9, although this might be further influenced by the availability or otherwise of convenient public transport. Numbers expecting to cycle did suggest an increase, from approximately 30 to 45.

5.8.5 Pressure on the commuting public

As regards the needs of other commuters, it seems that in respect of public commuter parking facilities there is an increasingly hard line being adopted at TTS that commuters can no longer expect to have convenient or even necessarily affordable parking provided for them by the States, and should be prepared either to change their habitual arrangements or adopt alternative methods of transport, both to reduce traffic congestion and to avoid the consequences of future parking shortfalls.

While this message clearly derives from the States approved Sustainable Transport Policy, the Panel is concerned that it will have an unreasonable impact on individuals for whom alternative transport is still a very long way from being a practical or realistic option. There may be great hopes for an improved bus service and the benefits it could bring, but very significant changes will be needed to the present network to provide sufficiently frequent, timely and reliable services to the entire Island to enable many residents to even consider giving up using their private cars to get to work.

Not surprisingly TTS took an idealistic view:

Manager, Transport Policy:

Certainly the shift workers that are starting for a 7.00 a.m. shift will take priority, you are right, and there is quite a lot of people who work for the police station that are civil servants or admin staff and some of the police officers themselves do not work those shifts, so some of them will be coming in later. But obviously the ones that come in earlier will get first access to those parking spaces and the car park will fill up earlier. But interestingly when we interviewed people as to their travel habits and said if the car park is full regularly when you get there, we found that 10 per cent said that they would then walk or cycle or catch the bus. So the reality is that having a little bit of pressure on private car commuters is supportive of the Sustainable Transport Policy, which looks to encourage a modal shift for car commuters. The other aspect of that is that some of them said they would look to get private parking and it came down to only 70 per cent would immediately transfer to other public car parking, of which Pier Road would be the most obvious choice. When you take all those factors, the actual migration to Pier Road would be less than that 150 figure I mentioned just going straight across to Pier Road.

While the department's November 2012 user survey results for Green Street car park did support a theoretical transfer of commuters to bus use, walking or cycling if Green Street was not regularly available (the total suggested shift being 11% of car park users), this figure was overshadowed by the 88% of users who stated that it was very important to them to be able to use Green Street.

Just because space may be available at a different public car park the Panel does not consider that it is acceptable to impose a policy of deliberately reducing public commuter parking provision on commuters in more popular locations, especially while public transport availability remains patchy and inconvenient in so many areas of the Island. The Panel does accept that some spaces may be freed up in other public car parks (for example Patriotic Street) if police staff relocate to Green Street, but based on the results of the internal survey of staff travel arrangements these numbers are expected to be small, with only around 14 staff currently using public parking.

5.8.6 Incentives to park elsewhere

Comments have been made to the Panel by TTS on previous occasions about the ability to incentivise people to park in different areas by adjusting the cost of parking, for example by encouraging commuters coming from the west to park in Patriotic Street rather than crossing through the Tunnel or going into town, or charging more for people who live within a certain distance of town to park within the ring road. It was noted that this approach was within the

scope of the ANPR technology currently being trialled at Sand Street, but the department did not appear to have any immediate plans to investigate this option.

5.8.7 Private parking

One possibility that provoked lively discussion during the public hearing with the Assistant Minister for Treasury and Resources concerned reports that a private landowner had offered space to enable private parking for staff very close to the Green Street site. This had previously been raised by the Minister for Transport and Technical Services and appeared to be common knowledge even earlier, the possibility of 40 new spaces being specifically referred to in the Council of Ministers' Comments on P.92/2012.

The Minister for Transport and Technical Services seemed quite confident that this arrangement had been put in place:

The Minister for Transport and Technical Services:

We are looking at several other options at the moment. There has been car parking provided, apparently, for the police who will be working nearby and that is something that Property Holdings have set up.

Officers seemed less certain but supported the idea:

Manager, Transport Policy:

We are comfortable with the scheme whether Property Holdings establish a car parking area privately offsite or not, the point being that the proposal is consistent with the Sustainable Transport Policy, which is that we will be looking to see a reduction in the number of commuter car parking spaces taken up town-wide. So that is why we are able to accommodate the reduction in 91 at Green Street.

Discussion during the hearing with Property Holdings was handicapped by the refusal of the Assistant Minister to identify the location of these potential spaces, or to confirm whether they were currently designated as a parking facility. While reasons of commercial sensitivity and the wishes of the owner were advanced to explain this, it was nonetheless frustrating for members of the Panel to be prevented from obtaining answers to important questions. The possibility that 40 or more private spaces might be available in the immediate area could clearly reduce the impact on commuters who would otherwise be displaced from public parking in Green Street.

However, this also raised other questions to which the Panel was not able to obtain answers at the time, such as whether the potential use of this site for police parking would displace existing parking, or any other economic use of the site; and who would be expected to pay for the private parking facility for police staff. The Assistant Minister for Treasury and Resources (and the Minister for Home Affairs, with whom the matter was raised at the previous hearing on 24th January) believed that individual officers would be expected to fund this for themselves.

Owing to the lack of evidence in respect of this issue the Panel considers that unless it can be fully and reliably explained, it should not be considered as material in any decision-making by the Planning Department. Apart from the other possible reasons mentioned above, it seems unlikely that staff who for the large part would have an easy opportunity to park at public parking rates before other commuters could arrive at Green Street would willingly pay a private rental, which would be expected to cost significantly more on a weekly basis.

There is also some confusion arising from evidence provided in the staff survey suggesting that 48% of staff relied on police permit parking currently, as opposed to 6% using public parking and 7.5% with private parking arrangements. This would imply that over 100 staff normally make use of free police permit parking, which seems surprising as it was reported by the Minister for Home Affairs that only very limited spaces were available on premises. The Panel is not aware of the total parking capacity that may be available to staff between the current Police HQ, Summerland and spaces available at Roussel Street, or the effect that shift working may have on staff members' ability to use these areas at different times. What is clear is that all of these staff would be expected to park at Green Street if the Police HQ is relocated there.

5.8.8 New developments: north of town and the Esplanade Quarter

The apparent reliance on new developments in the north of town area to provide additional public parking has already been discussed. There is clearly real doubt as to whether at least one (the largest) of these proposals will ever be followed up, which in turn casts some doubt on whether the TTS department has any coherent strategy for parking in place, or if it is essentially adopting a reactive approach to ongoing piecemeal development, provided that this does not conflict with the broad-brush principle in the Sustainable Transport Policy that commuter parking should be limited or reduced overall. Given similar doubts attaching to the future of other prospective developments the Panel feels that this approach has risks.

6. Traffic issues

6.1 Traffic flows

Given the limited time available for it to complete this review the Panel did not feel able to commission any additional survey work or traffic modelling to investigate the potential impact of the proposed Police HQ on traffic in the area. However, members have concerns about certain implications of the plans seen so far, as well as some lack of detail in the Traffic Assessment provided by Arup on behalf of Property Holdings.

Traffic flow through the Tunnel and the roundabout at Green Street at peak times is well known to suffer from substantial queuing particularly at peak times, with traffic from the west frequently backed up as far as the Esplanade underpass. This is described in the Arup assessment as being due to frequent operation of the traffic light operated pedestrian crossing at the eastern end of the Tunnel, which causes delays for traffic both entering the roundabout in a westerly direction, and also for motorists waiting to enter the Tunnel from the east. However, no comment is offered as to how this might be alleviated. The traffic assessment simply indicates that increases to traffic volumes following construction of the Police HQ would be relatively insignificant in terms of the existing flow.

The Panel accepts that overall traffic volumes may not increase significantly as a result of the relocation of Police HQ. However, from observation on site as well as inspection of the plans there are a number of factors that members consider give rise to potential concerns for both the safety and convenience of motorists passing through this junction, if current plans are adopted. There are also considered to be potentially unacceptable implications from some aspects of the plans involving staff and visitor parking arrangements.

6.2 Visitor access concerns

The Panel has several concerns about proposed visitor access to the site. As currently proposed, access for able-bodied visitors arriving by car would be limited to the use of 3 dedicated car parking spaces located close inside the entrance to Snow Hill car park. The police are apparently satisfied that the pattern of visits to their existing HQ suggests that this limited number of public spaces would be adequate for members of the public, bearing in mind that depending on the time of day motorists might also find spaces available in the main Snow Hill car park area or even in Green Street itself (although owing to reduced capacity once the Police HQ is built this might only be feasible outside normal working hours). However, the Panel is concerned that a total of 3 spaces is likely to prove inadequate

at times, especially if their allocation is not strictly policed. Given problems that arise elsewhere with members of the public improperly using disabled parking bays, members were not convinced by suggestions that the use of 3 dedicated parking spaces could be adequately managed and protected in a busy location like Snow Hill.

The Panel has concerns about this visitor parking arrangement on two counts. One relates to practicality; the Snow Hill car park entrance is relatively narrow, and once cars have filled the spaces nearest to the entrance there is insufficient space for turning. At times when the car park is full there is frequently a queue of cars waiting for spaces, which could make it awkward for visitors to the Police HQ to leave the area once their business was completed.

6.3 Crossing safety

Of more concern is the inadequacy of the crossing arrangements at the Tunnel end of Green Street. Pedestrian access to La Route du Fort from Snow Hill is currently via a small unprotected pedestrian refuge in the middle of the Green Street exit from the roundabout. This is located very close to the roundabout through which traffic sometimes passes at quite high speeds, particularly when motorists leaving the Tunnel to turn left into Green Street or go straight on into La Route du Fort can see that there are no other vehicles entering; at busy times this can make leaving Snow Hill car park in a vehicle a tricky and time-consuming exercise. For pedestrians needing to cross Green Street to access the Police HQ it is considered that this could be quite difficult or dangerous, especially for elderly people or anyone with restricted mobility. Discussion with TTS officers suggested that moving the crossing point further from the roundabout would in fact reduce visibility, so could increase the risks for pedestrians. The Panel feels that there will be a clear need for some sort of safety improvements to this crossing if additional pedestrian traffic is expected to use it. Currently the Traffic Assessment also shows 18 additional motorcycle spaces at the entrance lane to Snow Hill roundabout, presumably intended primarily for staff use, which would potentially add to pedestrian movements at this junction.

While not knowing exactly what measures might need to be introduced, the Panel considers that changes to the crossing will definitely be required. This would be expected to have an adverse effect on the flow of traffic through the Green Street roundabout, which might be significant if additional traffic controls were required.

6.4 Motorcycle and bicycle parking: impact on neighbouring properties

Another aspect of the existing plans which the Panel considers needs further thought involves proposals to extinguish the existing bus lay-by on the south side of La Route du

Fort to enable construction of a parking area for up to 38 police staff motorcycles and 52 bicycles, with access to the proposed main entrance to the Police HQ directly opposite to be provided by the construction of a new pedestrian crossing with central refuge across La Route du Fort.

This part of the planning application attracted a number of objections from nearby residents for various reasons, ranging from the need to remove a mature tree from the site to concerns about overlooking, potential noise issues from the numbers of motorcycles that might park there at any time of day or night, and even noise intrusion from loud conversations between staff arriving or leaving. Part of the sensitivity of the location relates to its proximity to the Limes Residential Home, where objectors clearly felt that noise disturbance would be unwelcome.

Having viewed the site Panel members felt that there were grounds for concern about possible impacts on surrounding properties. Although these might be reduced by screening or new planting, the Panel felt that removing the tree and siting a significant amount of motorcycle and bicycle parking here would indeed be inappropriate. Members had particular concerns about the impact of removing the off-road bus lay-by, although it was noted from observation that this was not always used currently by buses needing to turn right across two lanes of traffic to access Green Street via the roundabout, some of which tended to stop on the main road before the lay-by.

The Panel discussed the possibility of providing bus lay-bys on both sides of the road to improve the protection of passengers waiting there, as well as provide convenient stopping/access points out of the way of following traffic; TTS input suggested that boarding difficulties could be addressed by raised boarding points built into the pavement area at the bus stop, while it was felt that off-road lay-bys in fact caused more delay to buses trying to re-enter the flow of traffic, compared with a relatively brief stop in the road. There were also concerns that the width of the road was insufficient to allow for a lay-by on the north side. Notwithstanding this the Panel still has concerns about the potential impact on traffic flow at busy times of buses blocking the main road while stopping to drop off and pick up passengers, particularly if the number and frequency of buses using La Route du Fort is expected to increase over time.

6.5 Road safety concerns

A further concern in respect of the proposed motorcycle and bicycle parking area related to safety. Assuming that at least half of the two-wheelers intending to use the facility might be expected to arrive from the west, at peak times both bicycles and motorcycles would have to stop in the middle of a busy main road to turn right across oncoming traffic. This could result in an increased risk of accident at a complex junction which already experiences its fair share of road traffic problems. This concern also extends to some degree to the location of the planned main entrance, which will create additional traffic both entering and leaving the station, at a point where vehicles coming from the west would normally be accelerating to leave the roundabout. While visibility is not anticipated to be a problem at this point it is considered that the volume of traffic using La Route du Fort may cause difficulties, particularly for operational vehicles attempting to turn right towards the roundabout. These vehicles will have to negotiate 3 lanes of traffic travelling in different directions, some of which will also be changing lane at around that point.

One more safety concern is also referred to in passing in the Arup Traffic Assessment itself, in relation to the separate 'exit junction' provided for vehicles used for transporting prisoners when they leave the HQ building. The report states that visibility to the left is restricted at this point, although *'it is considered that this junction visibility is sufficient to allow safe operation for occasional use by 'professional' police drivers only.'* The likely frequency of use of this exit is not known, but the Panel considers that such a cautious reference to its positioning gives rise to some concern about the safety of other road users approaching it, who will not have the advantage of police driver training.

6.6 Disabled access

Another area of concern to the Panel involves disabled access to the proposed Police HQ. The Panel was assured at separate hearings with the Minister for Home Affairs and the Assistant Minister for Treasury and Resources that internal facilities would comply with all relevant bye-laws and standards for disabled access. However, members were concerned to discover that the only provision for parking for disabled visitors to the Police HQ involved shared use of a goods delivery unloading bay/lay-by outside the main entrance, which for security purposes would normally be protected by rising bollards at each end. The Panel considered that expecting disabled visitors to the Police HQ to share space with delivery vehicles to ensure that they could park close enough to the building for easy access raised concerns about equality issues and was clearly unacceptable. Challenged by the Minister for Home Affairs on the basis that many of Jersey's public buildings have no parking facilities

nearby for people with disabilities to use, the Panel's view was that when planning a brand new, state of the art building for States of Jersey Police use the access requirements of all members of the public should be properly catered for in the design.

Appendix 1

Island Plan 2011: Policy TT 10

Off-street public parking provision in St Helier

In order to contribute towards the objective of reducing peak hour congestion by 15%, planning permission for new additional off-street public parking spaces will not be permitted in the Town of St Helier unless the total level of public off-street car provision falls below 4,000 spaces (2009 levels), or where the provision of public off-street space is provided in lieu of the loss of private off-street parking provision.

During the Plan period, the Minister for Planning and Environment will support proposals that increase the proportion of short-stay off-street public parking and which limit or reduce the quantity of long-stay off-street public parking in St Helier, in accord with the objectives of the Sustainable Transport Policy (2010), and in accord with the overall level of off-street public parking provision permitted.

During the Plan period, the provision of public off-street car parking space at the following sites will be approved;

- Esplanade Quarter: a new 520 space MSCP, to replace the public off-street provision on the existing Esplanade Quarter surface-level car park; and

subject to the outcome of the proposals for North St Helier Masterplan and traffic impact assessments;

- Ann Court: a new 285 space MSCP, to replace the potential loss of Minden Place MSCP (@ 240 spaces) and its potential replacement with 25 public spaces;
- the provision of off-street public parking at key development sites in the north of the Town - such as at Bath Street; Jersey Gas and Ann Street Brewery - to provide up to 450 public spaces.

All development proposals within the masterplan will be required to be the subject of full transport assessments and to reflect the need and desire for parking at the time of implementation, which will be reviewed on a biennial (once every two years) basis, in order that long-stay off-street public parking can be limited or reduced and/or the proportion of

short-stay off-street parking increased, in accord with the objectives and performance of the Sustainable Transport Policy (2010).

New car park facilities will be required to incorporate sustainable drainage systems to promote infiltration.

The redevelopment of the existing Pier Road MSCP or the land identified for the extension of Green Street MSCP for alternative uses will be kept under review during the Plan period, relative to the demand for, use and availability of off-street public parking provision here and the outcome of any further studies undertaken within the context of Proposal 12 'St Helier Regeneration Zones'.

The redevelopment of surface level off-street public car parking provision in St Helier will not be resisted.

Planning permission for the provision of temporary surface level off-street public car parking on sites cleared for redevelopment or sites which have come out of their established use, will not be permitted.

Appendix 2

Island Plan 2011: Travel Plans

8.88 The Minister for Planning and Environment considers that travel plans should be submitted alongside planning applications which are likely to have significant transport implications, including:

1. residential development with more than 50 units of accommodation;
2. other developments comprising jobs, shopping, leisure and services which would generate significant amounts of travel. This particularly applies to office (over 2,500 sq m) and retail (over 800 sq.m) developments;
3. new and expanded school facilities which should be accompanied by a school travel plan; and
4. where a travel plan would help to address a particular local traffic problem associated with a planning application, which might otherwise have to be refused on local traffic grounds.

8.89 Where travel plans are to be submitted alongside a planning application, they should have measurable outputs and should set out the arrangements for monitoring the progress of the plan, as well as the arrangements for enforcement, in the event that agreed objectives are not met. This could include the agreement of sanctions if the targets are not met (which includes the lack of monitoring). Examples of sanctions might include the introduction of parking charges for staff. The most important part of the travel plans is that they are realistic and are capable of being monitored on an annual basis and corrective action sought where appropriate: subject to the availability of resources, the Transport and Technical Services Department will assess and monitor Travel Plans associated with the planning process.

8.90 The weight to be given to a travel plan in a planning decision will be influenced by the extent to which it materially affects the acceptability of the development proposed and the degree to which it can be lawfully secured. Under certain circumstances, some or all of a travel plan may be made binding either through conditions attached to a planning permission or through a related planning obligation. Conditions attached to a planning permission will be enforceable against any developer who implements that permission and any subsequent occupiers of the property. Planning obligations will be enforceable against the person who entered into the obligation and any person deriving title from that person. Unacceptable development should, however, never be permitted because of the existence of a travel plan.